

Planning Committee (Major Applications) B

Tuesday 10 December 2024

6.30 pm

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

Membership

Councillor Richard Livingstone (Chair)
Councillor Kath Whittam (Vice-Chair)
Councillor Ketzia Harper
Councillor Jon Hartley
Councillor Cleo Soanes
Councillor Michael Situ
Councillor Emily Tester

Reserves

Councillor Sam Dalton
Councillor Gavin Edwards
Councillor Nick Johnson
Councillor Richard Leeming
Councillor Darren Merrill
Councillor Reginald Popoola
Councillor Martin Seaton

INFORMATION FOR MEMBERS OF THE PUBLIC

Access to information

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Contact

Gregory Weaver on 020 7525 3667 or email: greg.weaver@southwark.gov.uk

Members of the committee are summoned to attend this meeting

Althea Loderick

Chief Executive

Date: 2 December 2024



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Planning Committee (Major Applications) B

Tuesday 10 December 2024

6.30 pm

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

Order of Business

Item No.	Title	Page No.
PART A - OPEN BUSINESS		
1.	APOLOGIES	
	To receive any apologies for absence.	
2.	CONFIRMATION OF VOTING MEMBERS	
	A representative of each political group will confirm the voting members of the committee.	
3.	NOTIFICATION OF ANY ITEMS OF BUSINESS WHICH THE CHAIR DEEMS URGENT	
	In special circumstances, an item of business may be added to an agenda within five clear days of the meeting.	
4.	DISCLOSURE OF INTERESTS AND DISPENSATIONS	
	Members to declare any personal interests and dispensation in respect of any item of business to be considered at this meeting.	
5.	MINUTES	1 - 7
	To approve as a correct record the minutes of the meeting held on 12 November 2024.	
6.	DEVELOPMENT MANAGEMENT	
6.1.	257-283 ILDERTON ROAD, LONDON, SOUTHWARK, SE15 1NS	8 - 207

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6.2.	110 THE QUEENS WALK, LONDON, SOUTHWARK, SE1 2AA	208 - 325
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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.”

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Date: 2 December 2024

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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 Tel: 020 7525 5403

 Planning Committee Clerk, Constitutional Team
 Governance and Assurance
 Tel: 020 7525 3667



Planning Committee (Major Applications) B

MINUTES of the OPEN section of the Planning Committee (Major Applications) B held on Tuesday 12 November 2024 at 6.30 pm at Ground Floor Meeting Rooms G02 - 160 Tooley Street, London SE1 2QH

PRESENT: Councillor Richard Livingstone (Chair)
 Councillor Kath Whittam
 Councillor Cleo Soanes
 Councillor Emily Tester
 Councillor Richard Leeming
 Councillor Martin Seaton

OFFICER SUPPORT: Colin Wilson, Head of Regeneration
 Ravinder Johal, Specialist Planning Lawyer
 Gregory Weaver, Constitutional Clerk
 Henrietta Ansah, Team Leader
 Dipesh Patel, Group Manager major Applications
 Matt Redman, Senior Planning Officer
 Richard Eiris, Principal Environment Protection Officer
 Michael Tsoukaris, Head of Design Conservation and Transport
 Alex Talbot, Project Manager
 Rachel Gates, Climate Change and Energy Project Manager
 Neil Loubser, Team Leader

1. APOLOGIES

Apologies were received from Councillors Michael Situ, Jon Hartley and Ketzia Harper.

2. CONFIRMATION OF VOTING MEMBERS

All 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, supplemental report and addendum report, which had been circulated before the meeting.

4. DISCLOSURE OF INTERESTS AND DISPENSATIONS

There were none.

The following member declared an interest in item:

8.3. 24/AP/0753 ROTHERHITHE GAS HOLDER SITE, SALTER ROAD, LONDON, SOUTHWARK, SE16 6DU

Councillor Kath Whittam, non-pecuniary, as she would be speaking on this item in her capacity as a ward councillor.

5. MINUTES

The minutes for the meeting held on the 16th April 2024 were agreed.

6. TO RELEASE £8,092,670.05 OF SECTION 106 FUNDING FROM THE GREEN BUILDINGS FUND FOR THE DELIVERY OF CARBON REDUCTION PROJECTS THAT WILL RESULT IN CARBON SAVINGS THAT WILL SUPPORT THE DELIVERY OF THE COUNCIL'S CLIMATE CHANGE STRATEGY AND ACTION PLAN

Report: see pages 4-23 of the main agenda.

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

RESOLVED:

1. That the planning committee approve the release of Section 106 contributions totalling £8,092,670.05 from the Green Buildings Fund ("GBF") as set out in Appendix A, for the delivery of carbon reduction projects that will be robustly assessed for carbon savings and other outcomes highlighted in paragraph 17 and will support the delivery of the council's Climate Change Strategy and Action Plan.
2. That the acting strategic director of environment, sustainability and leisure in consultation with the cabinet member for climate emergency, jobs and business be authorised to apply the funding released to a programme of decarbonisation projects to support the delivery of the Climate Change Strategy and Action Plan, in line with the council's constitution and departmental scheme of delegation.

7. THE RELEASE OF £260,800.60 FROM S106 AGREEMENTS IN THE OLD KENT ROAD AREA WILL SUPPORT THE PROVISION OF PUBLIC REALM AND PLAY FACILITIES

Report: see pages 24-53 of the main agenda.

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

RESOLVED:

1. That planning committee agrees to release funds totalling £260,800.60 of S106 funding, received via the sources outlined in Table 1, towards the enhancement of the public realm and delivery of play space on the Ledbury Estate.

Table 1 - Summary of Requested Funding

Reference	Profit Centre	Spend Category	Address	Amount
17/AP/1646	W08485	Children's Play Space	634-636 Old Kent Road, SE15 1JB	£9,061.64
18/AP/3246	W08535,	Public Realm	Land At Cantium Retail Park, 520 Old Kent Road, SE1 5BA	£234,012.50
21/AP/0749	W09435	Children's Play Space	157-177 Commercial Way, SE15 1AU	£17,726.46
Total				£260,800.60

8. 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.

8.1 651-657 OLD KENT ROAD, LONDON, SOUTHWARK SE15 1JU

Planning Application Number: 24/AP/0255

Report: See pages 59-159 of the main agenda and pages 1-3 of addendum.

PROPOSAL:

Variation of Condition 1 'Approved Plans', Condition 2 'Time and quantum of uses' and Condition 26 'Green, Brown and Blue Roofs' attached to planning permission 19/AP/1710, for: "Demolition of existing buildings on the site and the comprehensive mixed-use redevelopment of the site comprising of two buildings for residential (Use Class C3), flexible retail and commercial floorspace at ground floor and use class C1 at mezzanine level, new public park, private and communal amenity space, associated car and cycle parking, access and servicing arrangements, plant and other associated works". The amendments include the following: - Increase of 30 residential units, bringing the overall total to 292 homes; - Proposed extension to the west building by five floors to accommodate for the additional residential units; - Conversion of the Mezzanine to provide 12 new C1 Hotel Use studio apartments; - The addition of retail / commercial space to the Old Kent Road active frontages; - The increase of affordable housing from 39.8% to 40.04%; and - Changes to the internal layout, including the incorporation of two stairs to both building cores, to ensure compliance with fire safety regulations.

The Committee heard the officer's introduction to the report and addendum report.

Members put questions to officers.

There were no objectors present.

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

There were no supporters present.

There were no ward councillors present.

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

A motion to grant planning permission as on paper was moved, seconded, put to the vote and declared carried.

RESOLVED:

1. That planning permission be granted subject to conditions and the applicant entering into an appropriate legal agreement.
2. That in the event that the requirements of paragraph 1 above are not met by 12 May 2025, the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 258.

8.2 310-330 ST JAMES'S ROAD, LONDON, SOUTHWARK SE1 5JX

Planning Application Number: 21/AP/1667

Report: See pages 160 to 281 of the agenda and pages 3 to 6 of the addendum.

PROPOSAL:

Retention of existing Live /work unit and redevelopment of the site comprising demolition of existing buildings and erection of three buildings to provide new residential development and the provision of flexible Class E floorspace with public realm improvements, amenity space, cycle parking spaces, disabled car parking spaces and refuse/recycling stores and other associated works.

For information the development consists of;

- Erection of three buildings at 6, 9 and 21 storeys
- Maximum AOD height of 69.02m
- 161 residential units
- 1779 sqm of employment floorspace (Class E(g)(i) and E(g)(iii))
- 164.5 sqm of Sui Generis floorspace (retained Live / work)
- 33 sqm of ancillary community floorspace

The Committee heard the officer's introduction to the report and addendum report.

Members put questions to the planning officers.

There were no objectors present.

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

There were no supporters present at the committee.

There were no ward councillors present at the committee.

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

RESOLVED:

1. That planning permission be granted, subject to conditions and the applicant entering into an appropriate legal agreement.
2. In the event that the requirements of (1) are not met by 12 May 2025 the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reasons set out at paragraph 242 of this report.

8.3 ROTHERHITHE GAS HOLDER SITE, SALTER ROAD, LONDON, SOUTHWARK SE16 6DU

Planning Application Number: 24/AP/0753

Report: See pages 1 – 153 of the supplemental pack and pages 6 – 12 of the addendum.

PROPOSAL:

Demolition of the gasholder and all associated infrastructure; remediation of the Site; and redevelopment to provide residential dwellings (Use Class C3) and replacement telecommunications mast together with public realm, landscaping, car and cycle parking, vehicular access and servicing facilities, plant and associated works. 151 residential units in buildings of between 3 and 6 storeys.

The committee heard the officers introduction to the report and addendum report. Members put questions to the officers.

Representatives of the objectors addressed the committee and responded to questions put by members of the committee.

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

There were no supporters in attendance.

Councillor Kath Whittam and Stephanie Cryan addressed the committee in their capacity as ward councillors and responded to questions from members of the committee. After this Councillor Whittam left the room.

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

Members asked for the following to be included as conditions:

- To include an independent expert during pre-commencement

- Employ an expert on avian wildlife

A motion to grant planning permission as on paper was moved, seconded, put to the vote and declared carried

RESOLVED:

1. That planning permission be granted subject to conditions, the applicant entering into an appropriate legal agreement, and referral to the Mayor of London.
2. That in the event that the requirements of paragraph 1 above are not met by 28 February 2025 the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 301.
3. That the director of planning and growth be authorised under delegated authority to make any minor modifications to the proposed conditions and s106 obligations arising out of detailed negotiations with the applicant or the Mayor of London, which may necessitate further modification and may include the variation, addition, or deletion of the conditions as drafted.

Meeting ended at 10.20 pm

CHAIR:

DATED:

23/AR/0511/201/203 Alderton Road London Southwark SE15 1NS

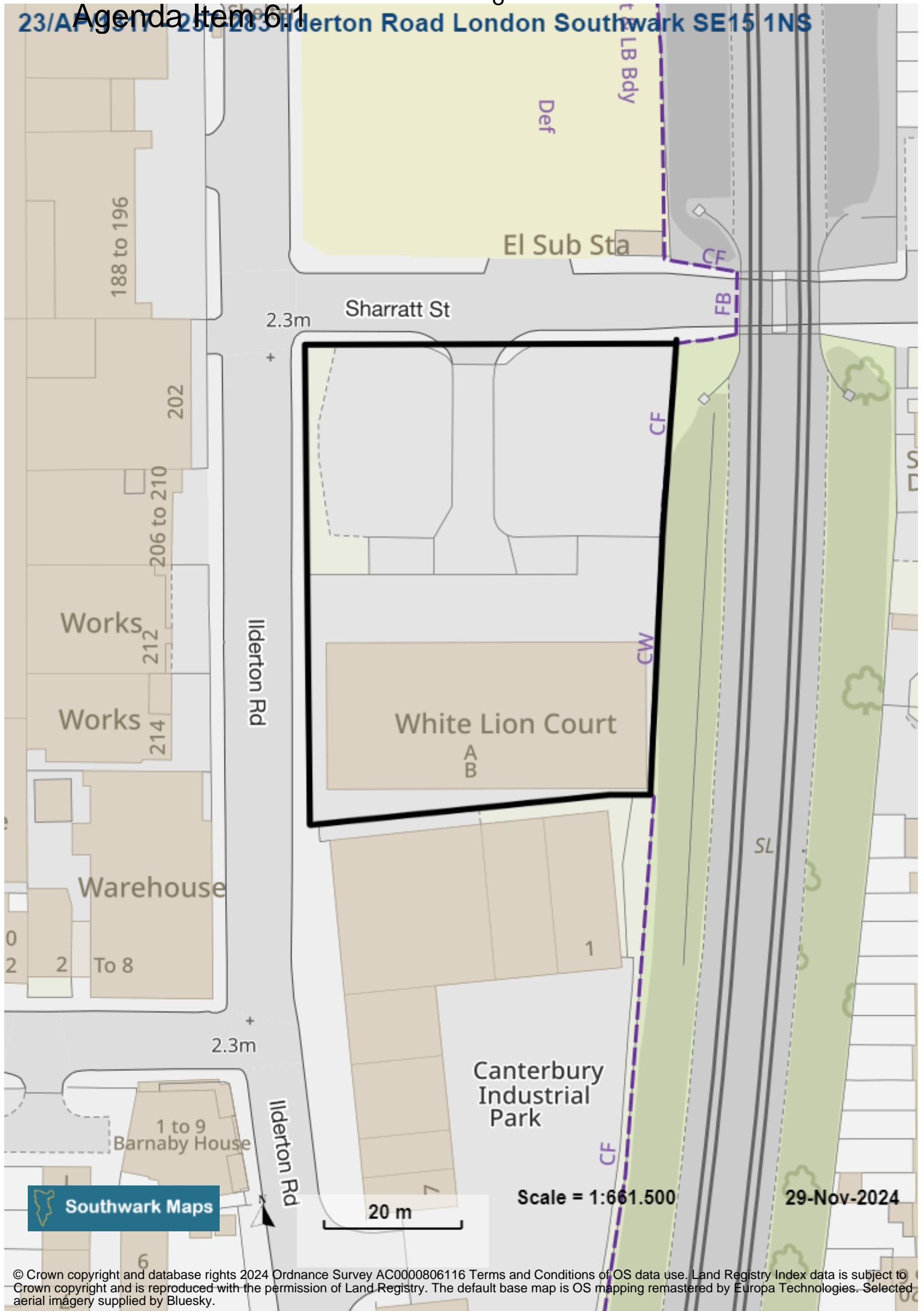


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Meeting Name:	Planning Committee (Major Applications) B	
Date:	10 December 2024	
Report title:	<p>Development Management planning application: Application 23/AP/1317 for: Full Planning Permission</p> <p>Address: 257-283 Ilderton Road London Southwark SE15 1NS</p> <p>Proposal: Demolition of the existing building and mixed use redevelopment of the site comprising Purpose-Built Student Housing including associated amenity and ancillary café and cycle workshop (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>	
Ward(s) or groups affected:	Old Kent Road	
Classification:	Open	
Reason for lateness (if applicable):	Not Applicable	
From:	Director of Planning and Growth	
Application Start Date: 27.06.2023	Application Expiry Date: 26.09.2023	
Earliest Decision Date: 20.02.2024		

RECOMMENDATION

1. That full planning permission be granted for 23/AP/1317, subject to conditions, referral to the Mayor of London and the applicant entering into a satisfactory legal agreement; and
2. That environmental information be taken into account as required by Regulation 26(1) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended); and
3. That the Planning Committee, in making their decision, has due regard to the potential equalities impacts that are outlined in this report; and

4. That, in the event of requirements of paragraph 1 above not having been met by 10 June 2025 the Director of Planning and Growth be authorised to refuse planning permission for 23/AP/1317, if appropriate, for the reasons set out in paragraph 540 of this report.

EXECUTIVE SUMMARY

5. A key redevelopment site and catalyst for change in the Old Kent Road Opportunity Area, the application site comprises a rectangular area land at the junction of Ilderton Road and Sharratt Street. The site is occupied by a vacant warehouse.
6. The potential of the site to make a 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. Both of the allocations recognise that some tall buildings will be necessary to deliver these objectives. There is a housing phasing plan for the Old Kent Road to ensure public transport capacity matches development capacity, with the first 9,500 homes to be delivered in Phase 1 in advance of the signing of the construction contract for the Bakerloo Line Extension (BLE). The second phase of 10,500 homes would be delivered after the contract was signed. This site is identified as a phase 2 site so would be subject to a "Grampian" type obligation which would mean the housing element could not be implemented until the BLE contract is confirmed which is predicted to be in 2030.
7. This application proposes the construction of two buildings arranged to wrap around the site along the street frontages. The shoulder block height will be 10 storeys and the 30 storey tower will be set back from the streets. In brief, the development would deliver:
 - Purpose Built Student Accommodation (hereafter referred to as 'PBSA'), comprising 592 bedspaces;
 - a 1,030 square metre light Industrial workspace / incubator units in the form of Fab Labs (100% affordable workspace);
 - a 6,947 square metre self storage
 - a 109.6 square metre café; and
 - a 95.4 square metre cycle workshop



Image 1 (above): View of the proposal looking southwards from western side of Idderton Road

8. The proposed 592-bedspace PBSA, which would be entirely direct-let (i.e. not linked to any specific university or college) at market rate, would not include any affordable student rooms. Instead, the application proposes to prioritise the delivery of general needs affordable housing in the borough, which would be provided in the form of a payment-in-lieu of £20.7 million because it is not viable to include on-site conventional housing alongside a feasible amount of student housing on this brownfield site. This payment-in-lieu is equivalent to 35% affordable housing by habitable room which the Council's expert assessor has deemed to be reasonable. The payment-in-lieu could potentially be used to directly support the delivery of affordable housing

close to the application site, thereby bringing tangible benefits for the local community. This is considered to be a benefit of the application.

9. The PBSA would achieve high standards of residential design, providing a range of bedroom typologies supported by a suite of internal communal facilities. The application is supported by a strategy for integrating the student population with the future occupiers of the affordable workspace as well as the wider Old Kent Road community. A Student Management Plan, to be secured by planning obligation, would ensure the successful long-term management of the premises.
10. 7,977 square metres of commercial/business floorspace is proposed comprising light Industrial workspace / incubator units in the form of Fab Labs (100% affordable workspace) and self-storage. The affordable workspace provision substantially exceeds the minimum requirement and has been designed to accommodate flexible spaces with different sizes and types of units including three units which have individual entrances fronting Sharratt Street, providing an active frontage onto the street.
11. 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, featuring numerous new trees and soft landscaping.



Image 2 (above): Visualisation looking south from the junction of Ilderton Road and Sharratt Street

12. With regard to amenity and environmental considerations, although the proposal would result in daylight and sunlight impacts at a small number of nearby existing properties that depart from the BRE guidelines, the retained levels are

still considered adequate for a dense urban area. The applicant's technical assessments, which quantifies and evaluates the scheme's expected impacts accounting for all proposed mitigation, has been assessed by officers in collaboration with specialists commissioned by the Council. The environmental effects can be acceptably managed through planning conditions and obligations.

13. 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 on balance 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 and the construction-related jobs and training, 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

14. **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	N/A	N/A	N/A	N/A	N/A	N/A
1 bed	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2 bed	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
3 bed	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
4 bed	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

15. **Commercial**

Use class and description	Existing GIA	Proposed GIA	Change +/-
E [a] to (f) (Retail/dining/services)	0	0	
E [g] i) (Office)	0	0	+1,030
E [g] ii) (Research and development)	0	0	
E [g] iii) (Light industrial)	0	1,030	
E [g] iii) (Affordable workspace)	0	1,030 (as a subset of the above)*	+1,030
B2 (Industrial)	0	0	N/A
B8 (Storage/Distribution)	1,115	6,947	+5,832
C1 (Hotel)	0	0	N/A
Sui Generis (PBSA)	0	20,643.6	+20,643.6

Sui Generis (cycle workshop)	0	95.4 (as a subset of the PBSA)	+95.4
Sui Generis (publicly-accessible café)	0	109.7 (as a subset of the PBSA)	+109.7

Employment	Existing no.	Proposed no.	Change +/-
Operational jobs (FTE)	0	25	+25

16. **Parks and child play space**

	Existing area	Proposed area	Change +/-
Public Open Space	0	0	N/A
Play Space	0	0	N/A

17. **Carbon Savings and Trees**

Criterion	Details		
CO2 Savings	39% improvement on Part L of Building Regs 2021		
Trees Lost	0 x Category A	0 x Category B	0 x Category C
Trees Gained	14		

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

Criterion	Existing	Proposed	Change +/-
Urban Greening Factor	0	0.4	+0.4
Greenfield Run Off Rate	N/A	2.1 l/s *	N/A
Green/Brown Roof Coverage	0	1646sq.m	+1646sq.m
Electric Vehicle Charging Points	0	2	+2
Blue Badge Parking Spaces	0	2	+2
Cycle Parking Spaces	0	687	+687

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

Criterion	Total Contribution
------------------	---------------------------

CIL (estimated)	£2,961,361
MCIL (estimated)	£1,988,33
Section 106 Contribution	As per the 'Planning obligations' section of this report

BACKGROUND INFORMATION

Site details

Location and description

20. The application site is located at the junction between Sharratt Street and Ilderton Road backing on the railway embankment on the edge of the administrative boundary of Southwark. It occupies a roughly rectangular parcel of land with Ilderton Road to the west, Sharratt Street to the north, Canterbury Industrial Estate to the south and Southern railway tracks to the east. The total area of the Site is approximately 0.34 hectares.
21. The Site is currently occupied by a rectangular shaped 2-storey warehouse and ancillary office space (Use Class B8). Hard standing yard space, historically used for open storage and vehicle parking, is situated to the north of the Site facing Sharratt Street. There are no existing trees located within the site.

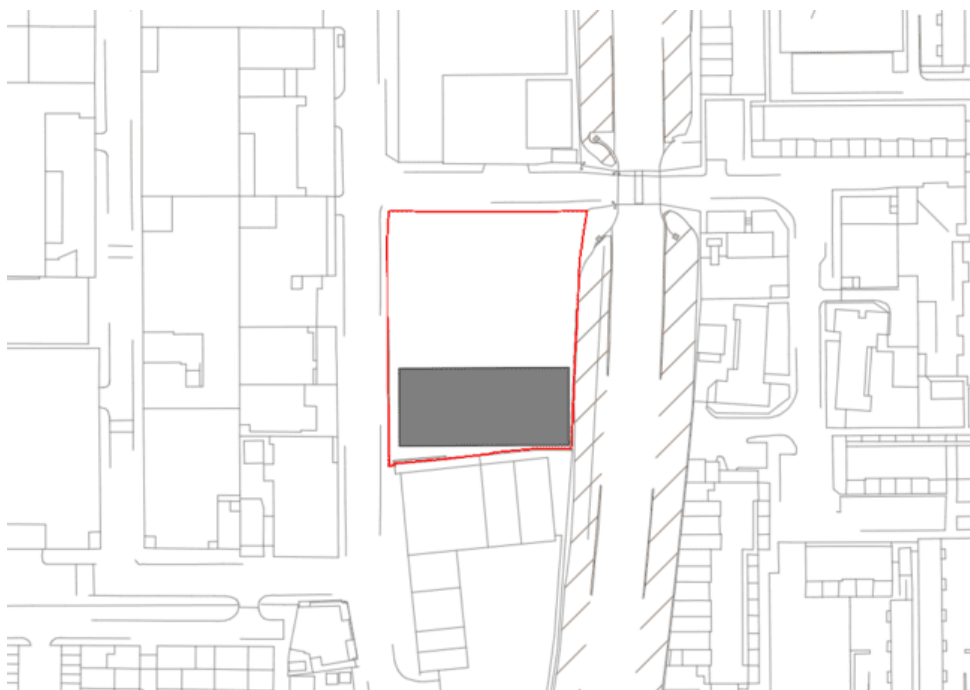


Image 3 (above): Location plan, showing the site edged in red.

22. Metal fencing currently runs around the periphery of the Site with existing access for both pedestrians and vehicles being from Sharratt Street. There is currently no access to the Site directly from Ilderton Road.



^ View key

Image 4 (above): Photographs of the existing site (numbered 1 to 4, clockwise from top left) with the viewpoints annotated on the map (bottom left).

Surroundings

23. The local area is characterised by a range of land uses, including residential, and commercial industrial, educational, cultural and leisure uses as well as some places of worship.
24. North of the site is the approved development proposals at 227-255 Ilderton Road (ref: 19/AP/1773) which is currently under construction. The Bermondsey Heights scheme comprises a part 2/3, 9 and 28 storey mixed-use development comprising of 2,538 sqm of industrial floorspace and 254 flats.
25. Immediately south of the site is the Canterbury Industrial estate consisting of mainly single storey building.

26. Immediately to the east is the railway embankment which marks the borough boundary of Southwark. Further beyond is three storey residential Oliver House and single storey Sankofa Nursery within Lewisham.
27. On the opposite side (western side) of the Ilderton Road, there are two storey industrial commercial buildings. Further to the north west is the approved development proposals at 180 Ilderton Road (ref: 22/AP/3339) which is led by Southern Housing currently under construction. This approved scheme comprises a part 5, 8 and 9 storey mixed-use development comprising of 2,361 sqm of flexible workspace and a part 5, 8 and 9 storey building to provide 84 residential units.
28. Both sides of Ilderton Road continues to be subject to substantial change. There are a series of planned tall building clusters coming forward within the Opportunity Area, particularly those on the eastern side of the Ilderton Road. These development clusters are aligned with the tall building strategy set out in the Old Kent Road Area Action Plan (hereafter referred to as the draft OKR AAP) which seeks to distribute taller buildings on the eastern side of Ilderton Road. These taller buildings should be spaced out along the length of Ilderton Road and should be set back from Ilderton Road adjacent to the viaduct. A 10 storey shoulder block should be provided fronting Ilderton road, to mediate the transition in scale; and the tallest buildings will be of a similar height to the existing towers on the Tustin estate.



Image 5: Model of the Indicative building heights in subarea 4 in the Draft AAP

Designations

29. The following policy, socioeconomic and environmental designations apply to the application site:
- Site Allocation NSP70 (Hatcham Road, Penarth Street and Ilderton Road);
 - Old Kent Road Area Vision AV13;
 - Old Kent Road Opportunity Area;
 - Old Kent Road Strategic Cultural Area;
 - Old Kent Road Action Area;
 - Old Kent Road Action Area Core;
 - the Urban Zone;

- Hot Food Takeaway Primary School Exclusion Zone;
 - Flood Zone 3 (in an area benefitting from flood defences);
 - East Southwark Critical Drainage Area;
 - the Air Quality Management Area;
 - “East Central” Multi-Ward Forum Area; and
 - Community Infrastructure Levy Charging Zone 2.
30. 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. The majority of the OKR 16 parcel is designated as a Locally Significant Industrial Sites within the draft OKR AAP and/or the Southwark Plan, and the application site falls part of the Locally Significant Industrial Sites.
31. With regard to heritage designations, the site does not include any listed structures and is not in a conservation area.
32. The site is within the 'North Southwark and Roman Roads' Tier 1 Archaeological Priority Area.
33. 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
34. 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 200 metres (a 4 minute walk) to the north of the site, at the junction of Ilderton Road and Stockholm Road;
 - Bridgehouse Meadows located 280 metres (a 6 minute walk) to the east of the site;
 - Bramcote Park located 380 metres (a 8 minute walk) to the north-west of the site; and
 - The 63 acre Southwark Park located approximately 1 kilometre (a 19 minute walk) to the north of the site
35. Immediately to the east of the site is the South Bermondsey Railway Embankments Site of Importance for Nature Conservation (SINC) which is located in Lewisham.
36. With regard to transport connectivity, the current PTAL rating of the site is 2, which indicates an 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.

37. South Bermondsey Overground is the nearest railway station, located approximately 680 metres to the north (a 13 min walk). It offers connections towards London Bridge, West Croydon and Beckenham Junction. The nearest underground station is Canada Water, approximately 1.2 kilometres to the northeast (a 19 min walk). As part of 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 application site in Lewisham.
38. A southbound bus stop is located in front of the application site, and a northbound bus stop is located further north of the application site on the opposite side of Ilderton Road. 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
39. 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. Cycleway 4 connecting London Bridge with Greenwich is approximately 230 metres west of the application site. There will also be the Cycle Future Route 12 (CFR12) connecting Rotherhithe and Peckham including a stretch along western side of Ilderton Road which is located to south-west of the site and is expected to be completed in 2025. Once delivered, it will provide the site with enhanced cycle connectivity.
40. The nearest short-stay cycle storage facilities are at the Ilderton Road shopping parade approximately 100 metres to the north of the site. These facilities comprise a bank of twelve Sheffield stands (24 spaces).
41. With respect to parking and servicing infrastructure locally, there are:
 - four Blue Badge parking spaces nearby (on Verney Road and Varcoe Road within Bramcote Estate and at distances of no more than 500 metres from the application 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 Raymouth Road, 600 metres away (a 12 minute walk);
 - one loading bay (accommodating up to four small vehicles) on Penarth Street, approximately 400 metres northwest of the site.

42. Although the site is not within a Controlled Parking Zone (CPZ), there is a plan to extend the existing Old Kent Road CPZ into the area.
43. The highways of Ilderton Road and Sharratt Street (western section) are part of the borough network. All 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.

Details of proposal

44. This application seeks full planning permission for comprehensive mixed-use redevelopment of the site to provide Purpose-Built Student Housing including associated amenity and ancillary café and cycle workshop (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.



Image 6 (clockwise from left): Ground floor division of various uses; and typical floor plate division

PBSA Building

45. The PBSA building will front Ilderton Road comprising of two cores A and B. The building will have a shoulder block height of 10 storeys (32 metres AOD) with a 30 storey tower block setting back from the street (94.65 metres AOD).
46. The ground floor would accommodate a publicly accessible ancillary café (109.6 square metres), cycle workshop (95.4 square metres) and exhibition space (50 square metres). The lower floors would contain cycle storage space and various communal amenity spaces such as lounge areas, a gym, a quiet study zone, on-site laundry and a management office. These internal communal amenity spaces would amount to 765 square metres in total, equating to an average of 1.29 square metres per student. Outdoor amenity would also be provided in the form of a terrace amounting to 274.4 square metres. The upper floors would comprise a range of student cluster bedrooms served by shared living/kitchen/dining facilities, with a number of studios also provided. The

internal spaces would be given over to ancillary mechanical, electrical and other plant requirements to serve the proposed development.

47. The 592 PBSA units are all to be direct-let (i.e. A nominations agreement whereby all or some of the rooms would be operated directly by a higher education provider has not been agreed) Instead, it is expected that the scheme would be managed by the applicant or by an established PBSA accommodation manager. The units will be tied to occupation by Students and secured within the S106 Agreement.

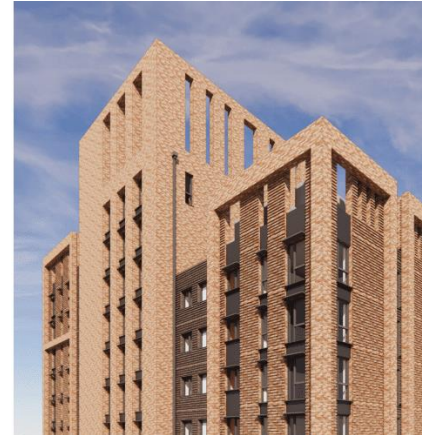


Image 7 (clockwise from top left): A visualisation of the two buildings as seen looking westward from Sharratt Street; Building A's crown treatment; Building B's base treatment; and

48. The proposed PBSA is car free with one disabled parking space to be provided within the southern service yard with a new vehicular access on Ilderton Road.

Commercial Building

49. The commercial building, to be attached the PBSA building with a small recess, would front Sharratt Street. Standing to a height of 10 storeys (32 metres AOD), the commercial building would comprise the light industrial / incubator units from the ground floor to fourth floor and the self-storage from the ground floor to ninth floor. The ground floor light industrial / incubator units will have their own individual entrances.

50. There will be a gated secured undercroft car park which will provide 9 parking spaces including 1 disabled parking and 2 vans spaces. Another disabled visitor parking space will be provided in front of the gate.

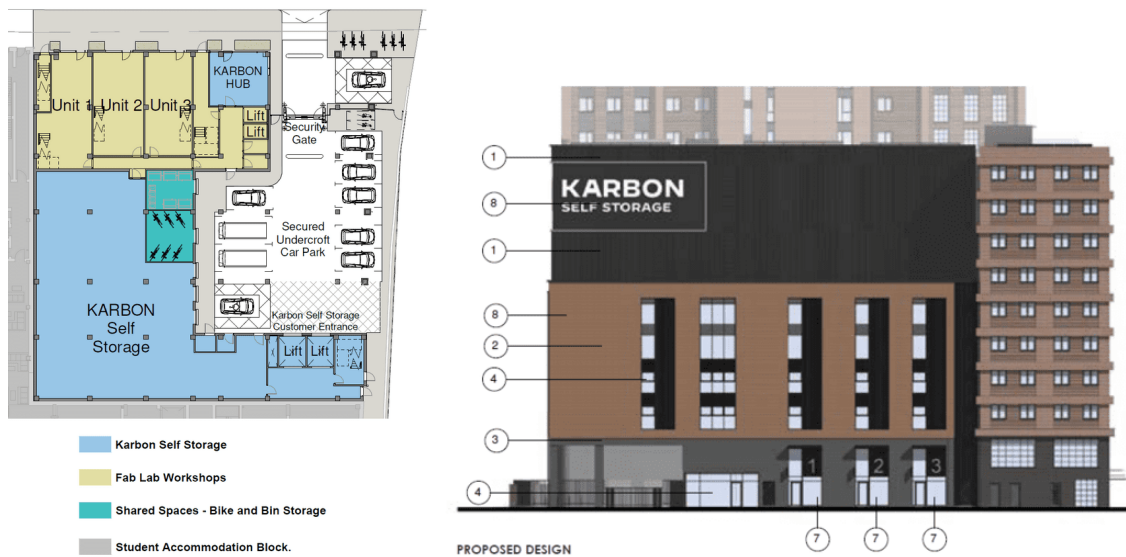


Image 8 (from left) Ground floor plan of the commercial building; northern elevation of the commercial building

Planning history of the application site and nearby sites

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

Pre-application engagement and mid-application amendments

Pre-application engagement

52. Planning application 23/AP/1317 was submitted following a detailed pre-application enquiry, the reference number for which is 22/EQ/0063. The pre-application process involved:
- six meetings with Council planning officers;
 - one workshop with Council transport officers;
 - one site meeting with network development officers
 - one meeting with GLA officers;
 - the applicant's attendance at the Council's Design Review Panel; and
 - the applicant's attendance on two separate occasions at the Old Kent Road Community Review Panel;
 - consultation meetings with ward councillors,
 - consultation meetings with community stakeholders including Vital OKR, Tustin Estate and Winslade Estate TRA, Ilderton Primary School and Christ Apostolic Church Surrey Docks;
 - consultation meetings with nearby developers including Renewal

(developer of New Bermondsey Quarter) and Barratt (developer of Bermondsey Heights);

- 2-days on-site public exhibition with 1,645 letters sent to local businesses and residents; and
- a website for the development

53. The Applicant initially proposed a scheme consisting of a self storage only at the pre-application stage in 2022. During the course of the pre-application, upon the request from officers, the applicant revised the scheme for 196 conventional homes, a self-storage unit and workspace in order to meet the aspirations of mix-used development in site allocation OKR16. However, the applicant later concluded the initial mixed-use scheme containing residential apartments is no longer viable due to the changes in the economic climate and changes to Building Regulations in relation to fire safety, and replaced the residential component with the currently proposed PBSA together with the self-storage unit and light industrial workspace.

54. During the course of the community engagement, the applicant engaged with the community to see how the PBSA could be integrated into the existing community optimally, and also made various amendments to the scheme design such as:

- incorporating cycle workshop within the PBSA building;
- refining the form and disposition of the buildings to achieve an appropriate relationship not only to each other but also in the context of the existing and emerging townscape;
- developing the architecture of the buildings to improve their legibility, materiality and distinctiveness;
- developing internal layouts of the light industrial / incubator units to be flexible to accommodate the needs of future occupiers and incorporating individual entrances to each ground floor unit and lifts for access to Level 2 & 3 workspace areas;
- developing the internal layouts of the PBSA units to achieve optimised configurations that perform well with respect to technical considerations such as dual aspect and daylight/sunlight receipt;
- fire safety provisions, in particular the need for the PBSA building to contain two escape stairs;
- increasing the amenity space provision;
- revising the delivery and servicing solution, including where and how provision would be made for student move in/out, on-site blue badge parking, and on-site loading and unloading for all the proposed uses;
- enhancing the public realm along Ilderton Road through a suite of highway upgrades, and financial contributions towards improving public transport including but not limited to increasing bus capacity.

55. The images below provide an overview of how the proposals evolved through the course of the pre-application process, comparing them with the final iteration as submitted for planning permission:



Accommodation Type

- AMENITY
- BINS
- CYCLES



Accommodation Type

- AMENITY
- CAFE
- BINS
- COMMERCIAL - FAB LABS
- COMMERCIAL - SELF STORAGE
- CYCLE WORKSHOP
- CYCLES
- PLANT

Image 9 (above): Ground floor layout and public realm proposals presented at pre-application meeting 3.

Image 10 (above): Revised ground floor layout and public realm proposals



Image 11 (above): Proposed View along Ilderton Road from the North looking South presented at pre-application meeting 3.



Image 12 (above): Revised Proposed View along Ilderton Road from the North looking South

56. At the end of this iterative process, the pre-application enquiry was closed and no formal response letter was issued by the Council. An overview of the pre-application consultation and engagement that has been undertaken, and the

responses to officer feedback, can be found in the applicant's Design and Access Statement as well as the Statement of Community Involvement

57. With regard to the Design Review Panel, the 'Design' section of this report sets out the Panel's comments and provides a summary of how the applicant responded to each of these. The copy of the Panel's full feedback can be found at Appendix 6.

Mid-application amendments

58. 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.
59. With respect to the uses of the building, the following changes are proposed:
- Incorporated café within the PBSA which would be publicly accessible;
 - Committed to provide 50 square metre exhibition spaces within the development for local schools, arts and community organisations for at least 25 occasions every year (at least 8 hours for each occasion);
 - Incorporated a cycle workshop unit
60. With respect to building and landscape design, changes and additional information included:
- reduction in number of student rooms from 615 to 592;
 - reduction in massing at the top of the building and the inclusion of a crown feature to modulate the upper floors of the building;
 - pulling back of the footprint of Block A to increase the width of the pavement on the corner of Sharratt Street and Ilderton Road;
 - moving some of the student internal amenity space from ground floor to first floor and the inclusion of a new community café that would be open to the general public;
 - removal of the raingarden features on the pavement to increase pedestrian width;
 - relocation of the security gate for the self-storage element
 - visitor cycle spaces within the self-storage element relocated to pavement
 - increase in size of the student external amenity space; and
 - more detail provided for the community bike workshop
61. With respect to energy and sustainability matters, changes to the energy strategy included:
- connection to District Heat Network to the PBSA;
 - use of air source heat pumps for active cooling and back up heating;
 - the expansion of the photovoltaics coverage (generating an additional 89.2kWp of renewable energy).
62. With respect to transport and highways, changes included:

- changes to the cycle storage proposals, including adjustments to the overall number and typological split of long-stay stands, as well as the layouts of the cycle store rooms;
 - changes to the bin store arrangements; and
 - revisions to the Blue Badge parking arrangement in the service yard of PBSA
63. The applicant also supplied a small number 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.
64. A second round of public consultation was undertaken in Feb 2024. The subsequent minor amendments did not necessitate any public consultation. This is because the changes did not:
- result in any enlargement to the buildings' scale; or
 - worsen any of the amenity or environmental impacts produced by the original scheme, or result in the creation of any new ones; or
 - remove, reduce or vary the mitigation originally proposed; or
 - engage any other issues potentially of wider public concern.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

65. 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;
 - Impact of proposal on development potential of nearby land
 - Development viability;
 - Dwelling size mix;
 - Quality of residential accommodation – PBSA;
 - External amenity 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.
66. These matters are discussed in detail in the ‘Assessment’ section of this report.

Legal Context

67. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. In this instance the development plan comprises the London Plan 2021, the Southwark Plan 2022 and the draft Old Kent Road Area Action Plan 2024. 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.
68. 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

69. 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

70. Consultation with members of the public was first conducted in September 2024 and then in February 2024. Letters were sent to local residents, the application was advertised in the local press and site notices were displayed. Comments were received from 1 local group and 1 developer of the adjoining site. The table below summarises the number of representations received during this period:

<u>Consultation: Summary table</u>	
Total number of respondents: 2	Total number of responses: 2

The split of views between the 2 respondents was:

In objection: **0**

Neutral: **0**

In support: **2**

Reasons in support

71. Listed below are the material planning considerations raised in support of the planning application by the consultation responses:
- provision of funding for affordable housing;
 - enhancements of public spaces with passive surveillance;
 - supporting local economy;
 - provision of new skills and employment opportunities;

Environmental impact assessment

72. Environmental Impact Assessment (EIA) 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.
73. 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.
74. The Council issued a screening opinion on the proposed development (ref: 23/AP/0737). While the development is considered an Urban Development Project, as defined in Schedule 2 of the Environmental Impact Assessment Regulations (2011) as amended, having considered the selection criteria referenced in Schedule 3 of the Regulations and the checklist set out in the National Planning Policy Guidance, it is considered that the development is not likely to have significant effects upon the environment. The matters to be considered can be adequately assessed through the submission of technical reports alongside the planning application, and therefore an EIA is not necessary. Those impacts which are identified through the various submitted reports and studies can be mitigated through appropriate conditions or obligations.

Principle of the proposed development in terms of land use

Relevant policy designations

Overarching strategic policy objectives

75. 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.
76. The Good Growth chapter of the London Plan includes objectives GG2 and GG5, which focus on making best use of land growing a good economy. 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

77. 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.
78. 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.

79. 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.

80. The Old Kent Road Area Vision also states that the draft OKR AAP will set out the physical framework for enabling the community to realise its potential. The Council is in the process of preparing this AAP 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. On 20 November 2024, the Council Assembly endorsed the latest reiteration of the OKR AAP (Regulation 19) would be published for consultation before submitting for examination which is expected to be in spring/summer 2025. In accordance with paragraph 48 of the NPPF, the draft Regulation 19 OKR AAP has increased weight. This draft plan proposes the delivery of 20,000 new homes and 10,000 additional jobs within the Old Kent Road.

81. 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. The Southwark Plan Area Vision 13 and draft OKR AAP Policy AAP2 identify that housing development in the OKR will be phased (OKR Housing Phasing Plan) , with 9,500 homes being delivered in advance of the BLE and a further 10,500 homes being delivered once the contract for the construction of the BLE has been signed. This is in order to ensure that the public transport capacity in the Old Kent Road can support the quantum of development coming forward. The delivery and phasing plan in AAP2 identifies this site as a Phase 2 site. Should planning permission

be granted the scheme would be subject to a “Grampian” type obligation. This would prevent the planning permission from being implemented until the BLE contract is signed and would fall away once it is signed. It is anticipated that that would be likely to occur in 2030, so the consent would be granted for 5 years rather than the usual 3 years.

Southwark Plan Site Allocation

82. The Southwark Plan 2022 includes a site allocation, NSP70 ‘Hatcham Road and Penarth Street and Ilderton Road’ which the application occupies approximately 5.2% of NSP70 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 (E(g)(iii) or B8 use class); and
- Provide public open space - 1,990m²

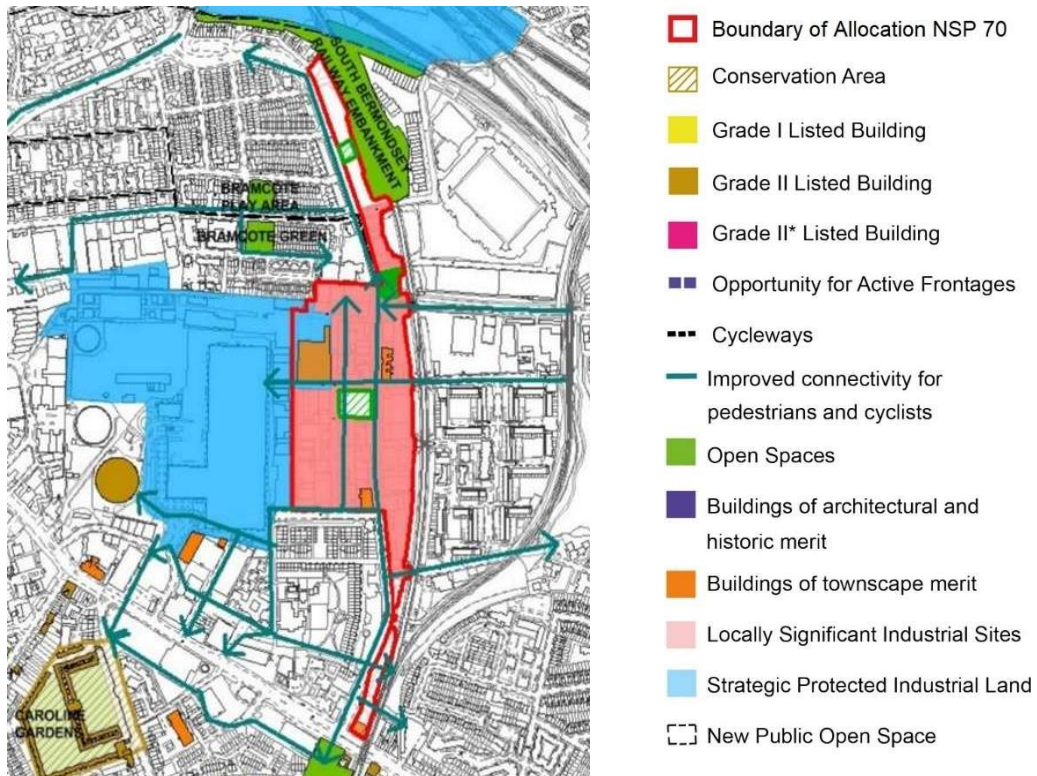


Image 13: Site allocation NSP70 ‘Hatcham Road and Penarth Street and Ilderton Road’ as depicted in the Southwark Plan 2022.

83. The design and accessibility guidance states that “development should reinforce the high street and provide a new part of the town centre.” The design guidance goes on to state that as the site falls within the Old Kent Road Opportunity Area, development will need to demonstrate that the site responds positively to the objectives of the draft OKR AAP.

84. NSP70 supports tall buildings and states that “comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape.”
85. The allocation also states that the site has the potential to connect to the District Heat Network (DHN) and South East Combined Heat and Power (SELCHP) network in the future.

Draft OKR AAP Site Allocation

86. 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 very similar that of Southwark Plan Site Allocation NSP70.
87. The draft AAP sets out some ‘must’ deliverables of redevelopment within OKR 16. Those applicable to the application site are:

- deliver new homes; and
- replace existing on-site employment floorspace (to be consistent with the building and land use types shown in Figure SA4.3, see right); and
- Provide industrial uses; and
- Provide mixed use industrial and new homes typologies in the area designated as a Locally Significant Industrial Site



- Horizontal Mix: Depots and medium-large storage and distribution units in mixed use developments
- Horizontal / Vertical Mix: Small industrial units
- Vertical Mix : Small office and studio
- Publicly-accessible open space

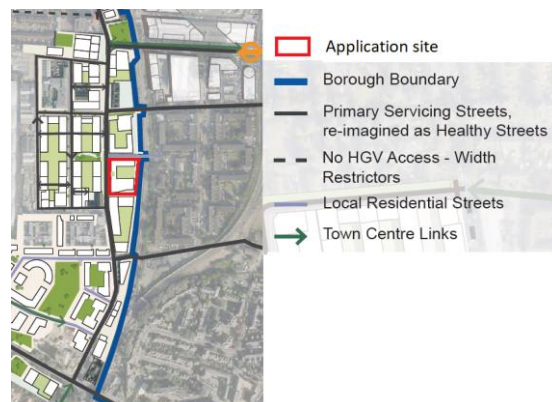
Image 14: (right): Figure SA4.3 of the draft AAP, ‘Building Typologies and Land Uses’, cropped to the application site (edged in red).

88. There are seven schemes which were already been built within OKR16. The Bermondsey Height at 227 - 255 Ilderton Road is under construction which will provide a total of 254 homes and 2,538 square metres commercial floorspace. 62 Hatcham Road has been completed providing 86 homes. 180 Ilderton Road is about to complete with 84 homes. 313 Ilderton Road has completed with 58 homes and 250 student rooms. So in total there are 481 homes either built or under construction within this site allocation and 250 student rooms completed. Several planning schemes for OKR16 have been granted planning permission or are to be granted subject to S106 agreement, which will deliver a further 389 conventional family homes, 890 co-living units, and 7,717 square metres commercial floorspace. It is expected for these schemes to be delivered by 2030 (BLE Phase 1).

89. In total 870 conventional homes, 890 co-living units and 250 student rooms (in 313 Ilderton Road) are coming forward in this site allocation in phase 1 against a total site allocation of 2,200 homes. For the purposes of calculating a conventional residential equivalent in the Old Kent Road housing phasing plan 3 student rooms or 3 co living rooms are the same as single conventional home. So in total 1,250 homes are coming forward in phase 1. Which equates to about half the allocation. Of the 870 conventional homes coming forward about 50% would be affordable. A scheme for 49 conventional homes at 78-94 Ormside Street and the remainder of this allocated site (including this application site) is expected to come forward in the early 2030s (BLE Phase 2). This scheme is also a phase 2 scheme.
90. The OKR 16 vision also sets out the design of buildings in this site allocation should reflect its robust and functional industrious character.
91. The draft AAP also includes a strategy with regard to building heights in OKR16, the key elements of which are:
- Taller buildings will be located on the eastern side of Ilderton Road, particularly at the northern and southern ends which have better public transport accessibility, and around important junctions such as with Surrey Canal Road, which provides links to Lewisham and Bridgehouse Meadows. These taller buildings should be spaced out along the length of Ilderton Road and should be set back from Ilderton Road adjacent to the viaduct. A 10 storey shoulder block should be provided fronting Ilderton road, to mediate the transition in scale; and
 - The tallest buildings will be of a similar height to the existing towers on the Tustin estate

92. The servicing and road network strategy for OKR16 says Ilderton Road will be retained as two way working and Sharratt Street is a local residential street.

Image 15: (right): Figure SA4.4 of the draft AAP, 'Building Typologies and Land Uses', cropped to the application site (edged in red).



Hatcham and Ilderton Roads Design Code

93. 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.

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

Conclusion on policy designations, including response to the site allocations

95. The overarching thrust of policies within the Development Plan is to optimise and make effective use of land. The site is a long-standing underutilised collection of land parcels and low-rise buildings, presenting a clear opportunity for optimisation.
96. In land use terms, the principle of redeveloping the application site for a mixed use development, including a mix of Purpose-Built Student Housing (Use Class Sui Generis), providing it meets the requirements of Policy P5 of the Southwark Plan and policy AAP 4 “Student Homes” of the draft OKR AAP (which is discussed in more detail below), a new self-storage facility (Use Class B8), light Industrial workspace / incubator units (Use Class E(g)(iii)) is on balance acceptable as it would bring into productive use this underutilised inner London site. The proposed mix and quantum of uses, subject to meeting the requirements of Southwark Plan Policy P5 and Policy AAP4 of the draft OKR AAP would on balance 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 OKR AAP.
97. The acceptability of each of the individual uses is considered below.

Higher education and associated uses

Policy background

98. The London Plan sets out the strategic vision for the higher education sector. Policy S3, which is concerned with education facilities, acknowledges that universities play a vital part in ensuring Londoners have the higher order skills necessary to succeed in a changing economy, and for the capital to remain globally competitive. Under Part B of the policy is a set of criteria that development proposals for education facilities should meet, including:
- being located in areas of identified need;
 - being in locations with good public transport accessibility; and
 - fostering an inclusive design approach.
99. Paragraph 5.3.8 of the supporting text to Policy S3 states:

“Higher education in London provides an unparalleled choice of undergraduate and postgraduate degrees, continuing professional development, advanced

research, and infrastructure to support business growth, such as incubation space and business support services. It is also a significant employer and attracts major international companies able to benefit from universities' research reputations, such as in pharmaceuticals and life sciences. Universities also play a vital part in ensuring Londoners have the higher order skills necessary to succeed in a changing economy, and for the capital to remain globally competitive. The Mayor has established a forum for higher education institutions and further education establishments to work with boroughs and other stakeholders to plan future developments, including student accommodation, in locations which are well-connected to public transport"

100. London Plan Policy E8 states that London's higher and further education providers, and their development across all parts of the city, are to be promoted. Their integration into regeneration and development opportunities to support social mobility and the growth of emerging sectors should be encouraged. The supporting text endorses measures to secure and develop London's leading role as a centre of higher and further education of national and international importance.
101. Southwark Plan Policy P27 says that development for higher and further education facilities will be permitted where they meet identified needs.

Assessment

102. Southwark is home to Kings College London, the University of the Arts, and London South Bank University, representing some of the largest universities in London. There are also a number of noteworthy higher education providers in adjacent boroughs such as Lewisham, which is home to Goldsmiths, the latter being easily accessible via the Old Kent Road transport corridor. The draft OKR AAP seeks to bring a university and other higher and further education facilities to the area. Benefiting from future transport improvements which would result in high transport accessibility and good links to the aforementioned higher education institutions, the application site's proximity to the Old Kent Road South District Town Centre (400m) makes it appropriate for education-related uses.
103. The student housing proposed by this planning application would meet an identified need within Southwark for higher education related facilities, while also supporting the Opportunity Area to progress towards becoming a centre of excellence for education. It would also form an integrated part of a mixed-use redevelopment. Therefore, in principle the proposed student housing land use aligns with the requirements of London Plan Policies S3 and E8, as well as Southwark Plan Policy P27, providing that it contributes to the creation of a mixed and inclusive neighbourhood.
104. As student accommodation is a type of housing, the acceptability of the proposed PBSA as part of the planning application's overall residential offer is considered within the following 'Housing' assessment. Other related considerations, such as the quality and management of the accommodation,

and how transport impacts would be mitigated, are assessed in the relevant later parts of this report.

Housing

Policy background

105. 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.
106. 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.
107. 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 2042.
108. 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 NSP70 and OKR 16 identify the allocation area’s capacity as being 2,200 homes.

Assessment

Principle of housing

109. By delivering 592 PBSA bedspaces, this planning application would contribute to realising the housing delivery targets for the Opportunity Area, in line with London Plan Policy SD1, while also increasing London’s housing supply, in accordance London Plan Policy H1.
110. The proposed housing units are lent further support by the Southwark Plan and the draft AAP, which promote residential uses on the application site in the quantum proposed, subject to the provision of affordable housing preferably on site or if not possible to provide onsite through the provision of a payment in lieu

(PIL). In this instance a PIL is proposed. The proposed housing would be entirely student homes, rather than a mix of conventional affordable housing and student homes and so would contribute to the creation of a less mixed and inclusive neighbourhood than would otherwise be the case. Nonetheless the scheme does include other non-residential uses including light industrial / incubator units (100% affordable workspace), community café and self storage in a well-connected inner London location, all of which contribute to the delivery of other plan aspirations, as would the payment of the PIL.

111. Appropriate design mitigation is provided in the residential element to ensure the industrial and related activities on-site and in surrounding parts of the Locally Significant Industrial Sites are not compromised in terms of their continued efficient function, access, service arrangements and days/hours of operation noting that many businesses have 7-day/24-hour access and operational requirements. The main design features include:
- separate entrances for the PBSA and the commercial units (See also 'Design' section);
 - adequate noise mitigation measures of the habitable spaces within PBSA including appropriate glazing and partition specification and use of Mechanical Ventilation with Heat Recovery (MVHR) (See also 'Quality of Residential Accommodation' section); and
 - off-street delivery and servicing arrangement (See also 'Delivery and Servicing' section)
112. A planning condition have also been imposed to ensure all the commercial units hereby permitted would be completed prior to the first occupation of the PBSA in order to the delivery of the industrial uses in accordance with Policy E7 (Industrial intensification, co-location and substitution) of the London Plan (2021).
113. Having regard to all of the above, and considering the conventional private and affordable housing which is being delivered within the wider site allocation all of which contributes to the creation of a mixed and inclusive neighbourhood the provision of residential floorspace, in form of PBSA with a PIL in respect of affordable housing , is on balance considered to be acceptable on this site.. This is subject to the PBSA meeting the relevant policies concerned with unit sizes, quality of accommodation, management arrangements and standards of amenity. These matters are discussed in later sections of this report.

Contribution towards borough housing targets

114. 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 2,200 new homes to the NSP70 allocation.

115. Although student housing 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. The London Plan advises that 2.5 student bedspaces should be treated as the equivalent of a single dwelling. With 592 student rooms proposed, the proposed development would contribute the equivalent of 237 (rounded) homes towards meeting the Council's housing targets. It would also reduce pressure on the local private rented market, in that it would release back to the private rented sector 237 single dwellings that would otherwise be in student occupation.
116. Aside from the contribution it would make towards the strategic housing targets set out in the Southwark and London Plans, the proposed PBSA would also assist in delivering off-site conventional (Class C3) housing, thus making a further contribution towards the targets. This is because the affordable housing payment in lieu is intrinsically linked to the delivery of the PBSA direct-let bedspaces.
117. The PBSA would deliver the equivalent of 237 homes. This directly equates to 10% of the borough's 2,355 home annual target and contributes indirectly towards the delivery of affordable homes elsewhere in the borough through the payment in lieu. Nonetheless as set out in the London Plan and draft OKR AAP, student housing should also contribute to a mixed and inclusive neighbourhoods as well as overall housing targets. As set out above, on balance this scheme is on balance considered to achieve that aim. In that context, the contribution the proposal would make to the Borough's housing delivery targets is acknowledged, albeit the lack of affordable housing on the site is disappointing given the great need for such provision.

Old Kent Road Housing Phasing Plan

118. 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.
119. 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 an agreed 3:1 conversion rate is applied in respect of PBSA schemes, where three PBSA units equate to one conventional (Class C3) dwelling.
120. In the wider context of extant planning permissions and live planning applications across the Old Kent Road Opportunity Area including those with

resolution to grant planning permission but are pending completion of a legal agreement bring the total number of homes within Phase 1 to 9,561 dwellings. This is summarised by the table below:

<u>Delivery of Old Kent Road Housing Phasing Plan: Summary table</u>	
Phase 1 schemes by status	No. of homes
Total of all Phase 1 schemes ^	9,561
Surplus/headroom relative to the 9,500-home cap	N/A
The 23/AP/1317 planning application	197

^ It includes 24/AP/0012 (Old Southern Railway Stables) proposing 32 units which the applicant has lodged an appeal against non-determination

121. Given that the proposal hereunder consideration would result in a breach of the 9,500 home cap, this development will be treated as a Phase 2 development. In order to avoid any undue infrastructural burden in the Opportunity Area, this proposed development be subject to the Grampian agreement to be secured in the Section 106 Agreement.

Conclusion on the provision of housing

122. Whilst residential uses are supported on this site at all policy levels, this is subject to both the provision of affordable housing where viable and also the contribution a scheme would make to a mixed and inclusive neighbourhood where student housing is proposed. The lack of onsite affordable housing means the development is inherently less likely to contribute to a mixed and inclusive neighbourhood than it might be, nonetheless it would make a contribution to meeting the Mayoral and local-level housing delivery targets. The PIL would contribute to affordable housing delivery and the site would play its part in delivering the capacity identified in Southwark Plan allocation NSP70 of 2,200 new homes. The provision of PBSA housing is on balance in this instance considered to be acceptable. In line with the Old Kent Road Housing Phasing Plan, the proposed development is within phase 2. The Applicant has agreed on a Grampian obligation in the S106 Agreement to avoid any undue infrastructural burden in advance of the Bakerloo Line Extension.

Student accommodation

Policy background

123. In order to help meet the London Plan target of 23,550 net new home completions over the next ten years, while also supporting the vibrancy and vitality of the town centres, Policy SD6 promotes mixed-use or housing-led intensification in these locations. The policy makes express reference to PBSA, saying the “particular suitability of town centres to accommodate a diverse range of housing should be considered and encouraged, including [...] student accommodation”.

124. Policy H15 of the London Plan sets an overall strategic requirement for purpose-built student accommodation (PBSA) of 3,500 bed spaces to be provided annually. The supporting text to Policy H15 is clear that PBSA contributes to meeting London's overall housing need and is not in addition to this need. Section 3.9 of the Mayor of London's Housing SPG states that specialist student accommodation makes an essential contribution to the attractiveness of London as an academic centre of excellence.
125. Part A of Policy H15 states that boroughs should seek to ensure the local and strategic need for PBSA is addressed, provided that:
1. the development contributes to a mixed and inclusive neighbourhood;
 2. it is secured for occupation by students;
 3. the majority of bedrooms and all affordable student accommodation is, through a nominations agreement, secured for occupation by students of one or more higher education providers;
 4. the maximum level of accommodation is secured as affordable student accommodation and;
 5. the accommodation provides adequate functional living space and layout.
126. Part B of Policy H15 encourages boroughs, student accommodation providers and higher education providers to deliver student accommodation in locations well-connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment schemes
127. Paragraph 4.15.3 of Policy H15 states that:
- “To demonstrate that there is a need for a new PBSA development and ensure the accommodation will be supporting London's higher education providers, the student accommodation must either be operated directly by a higher education provider or the development must have an agreement in place from initial occupation with one or more higher education providers, to provide housing for its students, and to commit to having such an agreement for as long as the development is used for student accommodation. This agreement is known as a nominations agreement. A majority of the bedrooms in the development must be covered by these agreements”.*
128. Where this is not achieved, paragraph 4.15.5 states that the accommodation will be treated neither as PBSA nor as meeting a need for PBSA. Instead, the development proposal will *“normally be considered large-scale purpose-built shared living and be assessed by the requirements of Policy H16 Large-scale purpose-built shared living”.*
129. At the local level, the Southwark Plan aims to deliver at least 40,035 homes between 2019 and 2036, equating to 2,355 new homes per annum. Policy ST2 of the Plan states that new development will be focussed in locations including Old Kent Road Opportunity Area, where the aim will be to balance the delivery of as many homes as possible against creating jobs, protecting industrial and

office locations, sustaining vibrant town centres, and protecting open space and heritage.

130. Policy P5 of the Southwark Plan requires PBSA proposals where all the bedspaces would be 'direct-lets', as is the case with the scheme proposed at Devonshire Place as set out below:
- as a first priority deliver the maximum amount of PBSA alongside a minimum of 35% of the habitable rooms as conventional affordable housing (subject to viability);
 - in addition to this provide 27% of student rooms let at a rent that is affordable to students as defined by the Mayor of London.
131. Policy P5 is structured in recognition of the acute need for more family and affordable housing within the borough. One of the footnotes to the policy explains that *"allowing too much student accommodation will restrict our ability to deliver more family and affordable housing. By requiring an element of affordable housing, or a contribution towards affordable housing from student housing development providing direct-lets, we can make sure we work towards meeting the strategic need for student accommodation and our local need for affordable homes including affordable family homes"*.
132. As such, the student housing policies of the Southwark Plan and London Plan, Policy P5 and Policy H15 respectively, differ in two key ways:
- Policy H15 prioritises the delivery of the maximum viable number of affordable student rooms (and does not expressly require student housing proposals to deliver conventional affordable housing either on- or off-site), whereas Policy P5 prioritises the delivery of conventional affordable housing; and
 - Policy H15 expects at least 51% of the bedspaces (the majority) to be subject to a nominations agreement, whereas Policy P5 requires all the bedspaces to be subject to a nominations agreement subject to viability.
133. Section 38(5) of the Planning and Compulsory Purchase Act 2004 (as amended) confirms that if to any extent a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy contained in whichever of those documents became part of the development plan most recently. As the Southwark Plan underwent examination and was adopted more recently than the London Plan, the policies within the Southwark Plan take precedence in this instance. The Council faces a complex situation locally with regard to the provision of affordable housing; at the Southwark Plan Examination in Public, the examining Inspectors recognised this challenge as presenting specific local circumstances in Southwark with regard to PBSA, and endorsed Policy P5 cognisant that the policy requirements do not fully align with those of the London Plan PBSA policies. Essentially, this means a student housing planning application within Southwark prioritising the conventional affordable housing contribution may be acceptable in principle in policy terms, despite not fully aligning with the expectations of London Plan Policy P15.

134. When assessing the principle of a student housing scheme, the policies outlined above require consideration of:
- the principle of introducing a housing use to this site;
 - the local and strategic need for student housing;
 - whether the student housing would contribute to a mixed and inclusive neighbourhood;
 - securing the accommodation for student occupation;
 - whether a nominations agreement has been secured;
 - securing the maximum level of affordable housing subject to viability; and
 - whether adequate and functional accommodation and layouts would be provided.
135. The following paragraphs of this report assesses the proposed development against these considerations. Later parts of this report deal with the other matters that these policies refer to, such as the affordable housing offer, quality of accommodation and transport aspects.

Assessment

Is there a local and strategic need for student housing?

136. There is a demand for more student accommodation across London, which needs to be balanced with making sure Southwark has enough sites for other types of homes, including affordable and family housing. The affordable housing element of the current application is considered further in a separate section of this report.
137. There are several higher education institutions (HEIs) in the borough with teaching facilities and student accommodation. These include London South Bank University (LSBU), Kings College London (KCL), University of the Arts (UAL) and London School of Economics (LSE). Mountview Academy, based in Peckham Rye, also provides a range of undergraduate and postgraduate degrees validated by the University of East Anglia (UEA). The borough is also home to some other smaller satellite campuses.
138. The strategic need for student accommodation is evidenced through the GLA paper 'Student Population Projections and Accommodation Need for new London Plan 2017' (amended October 2018). Drawing on Higher Education Statistics Agency (HESA) data, this document sets out the annual student housing need for 3,500 bed spaces within London over the plan period. The study projects the total student accommodation need in London to increase from 104,835 bed spaces to 171,063 bed spaces by the end of the plan period (2041/42).
139. The evidence base underpinning the Southwark Plan included a background paper on student housing, dated December 2019. It refers to the Council's Strategic Housing Market Assessment (SHMA) Update 2019, which found that:

- major HEIs within Southwark provide a total of 23,500 course places;
- over 21,000 students aged 20 or above live in the borough during term time;
- at least 50% of these students live in private rented accommodation, while 15% live with their parents; and
- there are some 7,800 bed spaces in PBSA in the borough.

140. In summary, since the proposed accommodation would add to a number of pre-existing direct-let student housing developments in the borough, it would nevertheless contribute towards the Borough's and London's stock of PBSA, for which there is an identified need. In this respect, the application addresses the overarching aim of Part A of London Plan Policy H15.

Would the student housing contribute to a mixed and inclusive neighbourhood?

141. Criterion 1 of London Plan Policy H15(A) requires student housing proposals to contribute to a mixed and inclusive neighbourhood.
142. AAP Policy 4 (Student Homes) of the draft AAP (2024) states that developments with student homes should demonstrate that they would integrate with the existing and future residential and business communities creating successful mixed and inclusive neighbourhoods, taking account of:

- 2.1. The proposal's delivery of the co-location of new residential accommodation with business and commercial space as set out in the sub area sections of the AAP; and*
- 2.2. The proposal's proximity to other student housing developments, higher education institutions and local services / infrastructure; and*
- 2.3. The availability of other sites for other types of homes, including affordable and family homes; and*
- 2.4. The proposal's delivery of other plan priorities, including affordable housing, affordable workspace and public open space that contributes to the delivery of the greener belt and movement strategies;*

143. Alongside the PBSA, the proposed development would include business and commercial space in the form of light industrial units (100% affordable workspace) and self storage, which would comply with criteria 2.1 of the draft AAP Policy 4

144. The immediate existing area surrounding the application site is characterised by a mix of uses, including residential, commercial industrial, educational, cultural and leisure uses. There are a number of large residential estates containing terraced houses and flatted residences within a range of point-blocks and deck-access buildings including:

- Tustin Estate (approximately 120m metres south-west of the application site);
- Bonamy and Bramcote Estate (approximately 300m metres north-west of the application site); and

- Winslade Estate in Lewisham (approximately 90m metres west of the application site)

145. There is one completed student scheme within 500m of the site at 313 Ilderton Road that contains a total of 250 student rooms. That scheme also comprises 35% on site affordable housing and light industrial use at ground and first floor levels. Within the Old Kent Road, two further entirely PBSA schemes have been completed at 671-679 Old Kent Road (known as the former KFC site, ref: 20/AP/2701) and at 272 St James Road (ref: 18/AP/0156, allowed by appeal) which are circa 590m and 930m away. There is a further entirely PBSA scheme at 43-47 Glengall Road (ref: 20/AP/0039) that is circa 1.3km away and will complete in early 2025. In total, these schemes provide 1,193 PBSA rooms in the OKR AAP area. There are no other planning consents at present for student schemes in the OKR16 site allocation, although there is a scheme in at pre application stage.
146. In terms of the emerging context within the site allocation OKR16 within sub area 4 of the draft OKA AAP, the table below shows there have been 245 conventional homes, 250 PBSA beds and 5,556sqm of commercial space completed and there is currently one scheme under construction which will provide a total of 254 conventional homes and 2,538sqm commercial floorspace. Several planning applications have been approved or received resolution to grant by the planning committee for the sites which will deliver a further 438 conventional homes and 886 Purpose Built Co-Living (PBCL) units and 8,406 sqm commercial floorspace under phase 1. Of the total conventional homes, approximately 37.8% will be affordable housing. Furthermore, 49 conventional homes together with 1,242 sqm commercial floorspace are also approved for phase 2.

Development within site allocation OKR16					
Ref	Address	Conventional homes	Student beds	Co-living units	Non-residential
Phase 1					
Built					
16/AP/1092	171-177 Ilderton Road	8	N/A	N/A	338
16/AP/2436	Atar House, 179 Ilderton Road	9	N/A	N/A	166
17/AP/3757	62 Hatcham Road	86	N/A	N/A	1,185
17/AP/4546	180 Ilderton Road	84	N/A	N/A	2,351
20/AP/1329	313-349 Ilderton Road	58	250	N/A	1,526
Subtotal		245	250	N/A	5,566
Under Construction					
19/AP/1773	227-255 Ilderton Road	254	N/A	N/A	2,538

Subtotal		254	N/A	N/A	2,538
Approved					
20/AP/3560	301-303 Ilderton Road	59	N/A	N/A	449
21/AP/1121	12-38 Hatcham Road	49	N/A	N/A	1,500
21/AP/1619	132-136 Ormside Street	0	N/A	N/A	270
21/AP/4757	Ilderton Wharf, 1-7 Rollins Street	163	N/A	N/A	988
23/AP/0387	79-161 Ilderton Road	120	N/A	605	1,023
Resolution to grant subject to s106 and GLA Stage II referral					
22/AP/1603	18 - 22 Penarth Street	47	N/A	281	4,176
Subtotal		438	0	886	8,406
Phase 2					
Approved					
23/AP/2226	78-94 Ormside Street	49	N/A	N/A	1,242
Overall total		986	250	886	16,510

147. Furthermore, a hybrid planning permission for a total 690 homes and 5,666 (GEA) non-residential floorspace has also been granted for the Tustin Estate redevelopment (ref: 22/AP/1221). Phase 1 of the Tustin development is currently undergoing construction which will deliver 167 conventional homes.
148. It is also noted that new development involving PBSA within nearby site allocation OKR18 within subarea 4 has been given planning consent or resolution to grant. These sites are located approximately 300 metres south-west of this application site:

New development involving PBSA within nearby site allocation OKR18					
Ref	Address	Conventional homes	Student beds	Co-living units	Non-residential
Approved					
23/AP/1862	747-759 & 765-775 Old Kent Road and Land at Devonshire Grove	200	941	N/A	908
Resolution to grant subject to s106 and GLA Stage II referral					
23/AP/0582	Daisy Business Park	23	688	N/A	2,000

149. When considering the cumulative impacts of the emerging PBSA developments nearby within the site allocation OKR16 and OKR18 and the Tustin Estate redevelopment, it should be noted that some of these schemes may or may not be implemented despite the grant of planning permission. Also, these schemes if implemented will also deliver a substantial number of new homes with different bedroom and tenure mix (1,747 homes) together with non-residential uses in the area. Furthermore, there also other sites available within OKR 16 and OKR 18 that could potentially come forward for conventional housing development.
150. Considering the above, the overall proportion of the conventional homes in subarea 4 would still be broadly maintained. The development therefore would meet criteria 2.2 and 2.3 of the draft AAP Policy 4.
151. The proposal would also contribute to other plan priorities through Affordable Housing Payment in Lieu (PIL) (See also the Affordable housing and development viability section below) and affordable workspace (see also the Principle of Development – non-residential development section below). Hence, it would comply with criterion 2.4 of the draft AAP Policy 4.
152. Introducing the amount of student housing proposed alongside other commercial uses in an area where conventional residential uses are well represented, is on balance in this instance considered to contribute to a mixed and inclusive community.

Would the accommodation be secured for student occupation?

153. Criterion 2 of London Plan Policy H15(A) requires the use of the accommodation to be secured for students.
154. The proposed development will be managed by an independent provider, most probably Homes for Students, an Accreditation Network UK certified operator. As such, responsibility will rest with Homes for Students to ensure the units are let to students on courses with HEIs. Student-exclusive use will be secured by way of an obligation in the Section 106 Agreement.
155. A supporting paragraph to Policy H15 notes that boroughs should consider allowing the temporary use of accommodation during vacation periods for ancillary uses. The viability evidence base for the Southwark Plan tested direct-let student housing schemes assuming a 40 week term time tenancy with 11 week non term-time let allowance. In light of this, it is considered reasonable to allow the operator of the proposed student housing scheme to let the rooms during the vacation period when not in use by the principal student occupiers. This will be secured through the Section 106 Agreement.

Is a nominations agreement in place?

156. Criterion 3 of London Plan Policy H15(A) requires the majority of the accommodation within a PBSA proposal to be secured for students, and for this to be achieved through a nominations agreement with one or more HEIs.

157. The applicant does not intend to enter into a nominations agreement with a HEI for any of the proposed accommodation; instead, the accommodation will be directly managed by an independent provider. While the proposed development would not comply with Criterion 3 of Policy H15(A) due to being 100% 'direct-let', the locally-specific and more up-to-date student housing policy (Southwark Plan Policy P5) supports direct-let student housing subject to the provision of affordable housing (which is in turn subject to viability) and additionally a proportion of the affordable student accommodation, and recognises it as PBSA. Accordingly, it is considered that if a development proposal complies with the affordable requirements that Policy P5 sets out for direct-let schemes, there is a policy compliant basis in this location for student accommodation schemes to not require the securing of a nominations agreement.

Has the maximum level of affordable housing been secured?

158. Criterion 4 of London Plan Policy H15(A) requires the maximum level of accommodation to be secured as affordable student accommodation.
159. However, and as mentioned in earlier parts of this report, it is considered that Southwark Plan Policy P5, in its prioritisation of conventional affordable housing delivery (subject to viability), provides a legitimate alternative pathway for student accommodation proposals to provide maximised affordable housing. While such general needs affordable housing would preferably be delivered on-site, a payment-in-lieu may be appropriate in exceptional circumstances and subject to robust justification, as per the Council's Section 106 Planning Obligations and Community Infrastructure Levy (CIL) SPD.
160. While the London Plan's specific requirement for student housing proposals to deliver affordable rooms is noted, the Council's priority is for conventional affordable housing due to the pressing need in the borough. Officers consider that although there would be some benefit to providing affordable student housing, this would be significantly outweighed by the benefits arising from general needs affordable housing delivery. Therefore, the latter should be prioritised. Southwark is one of the top four London Boroughs in terms of the provision of student housing, and already contributes significantly to London's student housing needs (notwithstanding the fact that there remains an unmet demand for student housing in the borough as set out earlier in the report). In reviewing the viability of the scheme, therefore, the surplus has been considered in terms of a contribution towards general needs affordable housing, rather than for use in reducing the rent levels of students occupying the site. Including affordable student housing within the development would adversely affect the overall viability, and therefore the level of contribution the development could make to general needs affordable housing.
161. The proposed development has been viability reviewed to determine the maximum viable contribution towards conventional affordable housing. The current offer of 35% Affordable Housing Payment in Lieu (PIL) offer represents the maximum viable contribution.

162. Since the affordable housing PIL offer does not meet the Southwark Plan 40% Fast Track requirement, an implementation-dependent Early Stage Review and post first occupation Late Stage Review will be imposed through the Section 106 Agreement. The matter of viability is dealt with in detail in a subsequent part of this report.

Does the accommodation provide adequate functional living space and layout?

163. A supporting paragraph to London Plan Policy H15 states that schemes not securing a nominations agreement for the majority of the accommodation will normally be considered as large-scale purpose-built co-living (PBCL). The London Plan expects the quality of accommodation PBCL schemes to be assessed against the requirements of Policy H16 and Purpose-built Student Accommodation London Plan Guidance (2024); these are more onerous than the counterpart standards for PBSA, which are set out in Criterion 5 of Policy H15(A). However, owing to the supportive position of the Southwark Plan regarding the principle of 100% direct-let PBSA, when assessing whether the accommodation proposed by this planning application would provide adequate functional living space and layout, it is considered appropriate to do so against the standards set by Criterion 5 of Policy H15(A) rather than Policy H16.
164. Criterion 5 of Policy H15(A) requires the accommodation to be adequate and functional in terms of its living space and layout. Southwark Plan Policy P5 which requires 5% of student rooms as “easily adaptable for occupation by wheelchair users”.
165. It is considered that the proposed development would provide good quality accommodation for students, meeting the expectations of the London Plan Policy H15 Part A (5) and Southwark Plan Policy P5. The spatial arrangement, environmental internal conditions, level of amenity (within the individual units and the communal spaces), and the provision of wheelchair housing would all be adequate, as explained in detail in a subsequent part of this report entitled ‘Quality of Accommodation’.

Is the location suitable for student accommodation?

166. Part B of London Plan Policy H15 requires student housing scheme sites to be well connected by transport to local services. Situated within the Opportunity Area and proximity to the Old Kent Road South District Town Centre (within 7 minutes’ walk), the site benefits from future transport improvement which would result in high accessibility to public transport, conveniences and services. There are also numerous leisure and recreation spaces available for students nearby, including Brimington Park and Bridgehouse Meadows. Goldsmiths approximately 20 minutes away by bus. For all of these reasons, the application site is considered to a suitable location for PBSA.

Summary on the principle of student housing

167. In conclusion, the site is considered to be appropriate in principle for student accommodation, meeting a demonstrable need and achieving compliance with

the requirements of London Plan Policy H15, Southwark Plan Policy P5 and draft AAP Policy 4. The proposal would provide high quality accommodation for students in an accessible and sustainable location and are considered on balance to contribute to the creation of a mixed and inclusive community in the area considering the existing large residential estates nearby and the emerging context with other mixed use development nearby within site allocation OKA16 and OKA18 and the Tustin Estate renewal.

168. 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. The Southwark Plan anticipates will come forward at an average of approximately 601 homes per year over the period to 2036. The London Plan advises that 2.5 student bedspaces should be treated as the equivalent of a single dwelling; with 592 student rooms proposed, the development would contribute the equivalent of 237 (rounded) homes towards meeting the Council's housing targets. This would make a substantial contribution towards the annual target of 601 homes, and as such is welcomed. It would also reduce pressure on the local private rented market, in that it would release back to the private rented sector 237 single dwellings that would otherwise be in student occupation. In addition, affordable housing payment in lieu is also secured to deliver conventional homes elsewhere in the borough.
169. The proposed student housing scheme therefore would not compromise the Council's ability to meet its strategic housing targets set out in the Southwark Plan and London Plan, because student housing contributes towards the borough's housing delivery targets. However as noted in the Southwark Plan the provision of student housing needs to be balanced with making sure there are enough sites for other types of homes including affordable and family homes.
170. For the reasons given above, the proposed student accommodation use would help contribute to the strategic housing delivery targets of the development plan, but in order to ensure the Council's vision to "build more homes of every kind in Southwark and to use every tool at our disposal to increase the supply of all different kinds of homes", as set out in Southwark Plan Policy ST2 is met the balance with conventional housing needs to be considered as well. As set out above in paras 141 to 152 when considering the development coming forward in the site allocation area on balance there is still considered to be an acceptable mix of homes in this neighbourhood.

Non-residential (commercial/employment/business) uses

Policy background to employment/business uses

171. 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 and expects 10% all new employment floorspace to be affordable workspace for start-ups and small and independent businesses.

172. 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.
173. The Southwark Plan and OKR AAP site allocations expect at least the amount of employment/business floorspace currently on the site (Class E(g) / B Class uses) to be reprovided.

Policy background to affordable workspace

174. Policy P31 of the Southwark Plan deals with affordable workspace. Although affordable workspace technically applies to employment/business uses, Criterion 2 of the policy requires major development proposals to deliver affordable workspace amounting to at least 10% of the gross new employment floorspace (i.e. not just employment/business space, but commercial space too). The workspace should be secured 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

Quantum of proposed non-residential use compared to existing land use

175. The site contains a 2-storey warehouse with approximately 1,115 sqm of industrial floorspace (Class B8).
176. The proposed commercial building will accommodate 1,030 sqm GIA of light industrial units in the form of 'Fab Lab' (Class E(g)iii) and 6,947 sqm GIA of self-storage. The ground floor light industrial units have been designed to allow business to grow with demountable mezzanine floors without requiring planning permission in the future as, and when required which means a maximum of 10,298 sqm GIA could be accommodated within the proposed commercial building.

177. The comparison of existing and proposed employment floorspaces are provided below:

Proposed Commercial Uses and quanta: Summary table			
	Class E(g)(iii)	Class B8	Total
Existing	0	1,115	1,115
Proposed	1,030	6,947	7,977
Net increase			6,862

178. Overall, the proposals would result in an uplift of a minimum of 6,862 sqm (GIA) of industrial / storage and distribution floorspace, which would exceed the re-provision of existing quantum of non-residential floorspace requirement stated in the site allocations NSP70 in the Southwark Plan and OKR16 allocation in the draft OKR AAP. The smaller nature of the light industrial units would also meet the needs of the creative industries.
179. Furthermore, a planning condition have been imposed to restrict the Fab Labs to light industrial uses (Class E(g)(iii)) only. This would preclude any potential future changes of use to other sub-categories within Class E that would otherwise be permitted under the GPDO. Currently, there are not any permitted development rights to go from B8 to any other use class. A planning obligation has been attached to ensure 7,977 square metres GIA of industrial or storage and distribution uses (Class E(g)(iii), B(8) and B(2)) will be retained throughout the lifetime of the development. This is to ensure the long-term land use vision for this part of the OKROA is realised. This represents an improvement on the existing as the current building benefits from flexible Class E use including non-industrial and logistics uses.

Affordable workspace

180. The total quantum of proposed employment-generating floorspace within the development is 7,977 square metres GIA. Under the terms of Policy P30, at least 10% of this (i.e. at least 798 square metres) should be dedicated as 'affordable workspace'.
181. The proposed development will deliver 1,030 sqm GIA which substantially exceed the 10% of the minimum affordable workspace required (i.e. 798 sqm GIA). The affordable floorspace will be provided in the form of 'fab labs' which are light industrial workspace/ incubator units (Class E(g)(iii)) primarily targeted at individuals seeking small, affordable, flexible industrial style space such as artists, painters and potters, community groups, carpenters, framers, and other light industrial businesses, and start-up businesses.
182. The ground floor Fab Labs Units will have an element of double height space with floor to ceiling heights of approx. 5.7m. Proposed partial mezzanines are illustrative (as desired). The applicant has engaged three perspective charities to understand their desired type of space and the Fab Labs have been designed to accommodate

variety of different flexible space which would allow the future charity operator to let the space to a mixture of Class E(g)(iii) tenants across the 3 floor levels to create diversity within the facility. The applicant has been discussing the potential lease terms of the affordable workspace with Southwark Studio.

183. 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 part of the self storage 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.
184. For the reasons given above, the proposed affordable workspace offer is policy compliant.

Publicly-accessible ancillary café, cycle workshop and exhibition space within the PBSA student amenity space

185. The proposed Sui Generis use for the unit at the base of PBSA building is a factor of the café being within the demise of the PBSA and forming part of the PBSA amenity space offer (and thus technically being a Sui Generis use). At least at 'day 1' of the development becoming operational, the café would be staffed and managed by the PBSA operator. The café would be open to the wider public as well as students. To be managed by the PBSA operator, the café was proposed by the applicant as a direct response to feedback from pre-application meetings with officers and the Community Review Panels.
186. The café would complement the 7,977 square metres of non-residential uses proposed on the Ilderton Road and Sharratt frontages, while also supporting the restaurant offer across the wider town centre. Additionally, the unit would help draw members of the public into the heart of the site and improve activation by providing an extensive glazed frontage onto this Ilderton Road and Sharat Street junction. This public facing café would also serve a community integration role, being a place where the future student residents can meet and interact with the wider community. It is therefore supported by policy at all levels.
187. The publicity accessible cycle workshop located within the PBSA will also be part of the PBSA amenity space offer. The applicant is committed to find an operator to provide bike repair service. This would be secured through a Section 106 Agreement.
188. The applicant is also committed to provide 50 square metre exhibition space within the ground floor of the development to local community for 200 hours per year. The exhibition space is considered to be ancillary to the PBSA and light industrial uses.

Conclusion on uses

189. The proposed land uses are on balance appropriate in policy terms for this site within the Old Kent Road Opportunity Area. The introduction of PBSA would facilitate the growth of the borough's education offer. The provision of on site affordable housing would have made a more significant contribution to the delivery of a mixed and inclusive neighbourhood, and the applicant originally pursued that approach, but viability challenges have resulted in the offer of a PIL in order to secure the sites redevelopment. A community café and cycle hub within the development will be publicly accessible, and free exhibition space will be offered to the local communities for at least 200 hours every year. These would also contribute to the creation of a mixed and inclusive community within this part of the Opportunity Area.
190. The self storage and Fab-Labs would be complementary to, and would co-exist well with, the proposed residential uses. These units would activate the Ilderton Road and Sharratt Street frontages. The provision of 1,030 sqm affordable workspace in the form of Fab-Labs would exceed the affordable workspace policy minimum requirements. The proposals, in providing a mix of residential and employment-generating uses, meet the expectations of the Southwark Plan and draft OKR AAP site allocations.
191. The range of proposed uses will generate new jobs and revitalise this longstanding under-optimised site. The proposed development would provide essential employment opportunities, place-making and public realm for both future and existing communities. In conclusion, the proposed uses are on balance considered to be acceptable.

Affordable housing and development viability

Policy background

192. 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.
193. The Southwark Plan includes a Fast-Track route. The relevant policy, Policy P1, 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.

194. Southwark Plan Policy P5(2) states that purpose built student housing when providing direct lets at market rent must provide the maximum amount, with a minimum of 35% as conventional affordable housing by habitable room subject to viability, as per policy P4, as a first priority. In addition to this, 27% of student rooms must be let at a rent that is affordable to students as defined by the Mayor of London.
195. Alternatively, P5(3) states that when providing all of the student rooms for nominated further and higher education institutions, provide the maximum amount of affordable student rooms with a minimum of 35% subject to viability. The affordable student rent should be set as defined by the Mayor of London.
196. The Southwark's Development Viability SPD, in requiring an in lieu payment of £100,000 per habitable room of conventional affordable housing, effectively establishes the minimum payment-in-lieu a scheme should deliver. However, the policy expectation, as per Southwark Plan Policy P5, is for development proposals to deliver the maximum viable amount. It should also be noted that the SPD does not provide an in lieu figure for affordable student housing, as the SPD was drafted before the current London Plan policy was adopted. A new S106 SPD has just been consulted on, but as the consultation has only just finished it has very little material weight. Nonetheless the new SPD does propose a higher per habitable room payment of £135,000 per room.

Assessment – Eligibility of Fast Track threshold

197. An earlier part of this report entitled 'Principle of the proposed development in terms of land use' detailed the policy context for student housing proposals, and explained that Policy P5 takes precedence over the counterpart London Plan student housing policy. The policy provides two avenues for applicants to follow, one for schemes that are entirely direct let (this is P5(2) and one for schemes that are nominations (this is P5(3)).
198. The applicant initially proposes that 35% of the student beds would be affordable student accommodation, which would meet the Mayor's Fast-Track threshold. However, given the Council's priority to deliver conventional affordable housing, upon the request from Southwark officers, the applicant has revised the scheme to instead deliver a 100% direct-let scheme with a payment-in-lieu towards off-site affordable housing.
199. In order for the PBSA schemes with affordable housing payment-in-lieu to meet the Council's Fast-Track threshold, the payment-in-lieu is required to be at least 40% of the proposed number of habitable rooms in the PBSA. GLA officers have confirmed that for PBSA schemes delivering off-site conventional affordable housing via a PIL would need to meet the

Southwark's 40% requirement in order to qualify the Mayor's Fast Track threshold.

200. Since the proposed development does not offer at least 35% on-site affordable student accommodation or 35% conventional affordable housing or affordable housing payment-in-lieu equivalent to at least 40% of the habitable rooms in the PBSA, the proposed development does not meet the Southwark and Mayor Fast Track thresholds.

Assessment of maximum viable amount of payment-in-lieu

201. The applicant has submitted a Financial Viability Assessment (FVA) in accordance with the Affordable Housing SPD and Southwark Plan Policy P5 to allow an assessment of the maximum level of affordable housing that could be supported by the development. The appraisal was reviewed by BNP Paribas on behalf of the Council.
202. Officers and BNP Paribas have scrutinised the assumptions used in the FVA and have substantial discussion with the applicant. The applicant's latest FVA concludes that the proposed development can only afford an affordable housing payment in lieu of circa £5m. Reviewing further evidence on construction costs, Operating Expenses or Expenditure (OPEX) and the yield for the PBSA have been provided, BNP Paribas has confirmed that a 35% affordable housing provision of £20,720,000 as an in-lieu payment to the Council (equates to 207.2 habitable rooms) to use for providing affordable housing is the maximum viable amount subject to early and late-stage reviews. The applicant has agreed on this amount of the affordable housing PIL which would be secured through a S106 agreement.

Review mechanisms

203. The Section 106 Agreement will secure an Early Stage Review in the event of implementation being delayed for more than two years, as well as the Late Stage Review, in accordance with Policy H5 (F) (2). As student housing is not typical 'for sale' housing, and the value relies on the rent levels achieved, it is proposed that the Late Stage Review be carried out after the first full academic year of occupation of the development.

Conclusion on affordable housing and development viability

204. The London Plan and Southwark Plan contain policies seeking the maximum reasonable and financially viable amount of affordable housing in proposed developments. These policies at London and borough levels allow for a commuted sum in exceptional circumstances, and the NPPF acknowledges that there may be circumstances where a payment-in-lieu can be justified. Where it is clear that a payment-in-lieu approach would deliver more (and more appropriate) affordable housing, a commuted sum is acceptable.

205. The payment in lieu of £20.72 million index-linked offered by the applicant is substantial and could contribute to delivering affordable housing through its Council Homes Building Programme. The acceptability of the offered payment-in-lieu is based on the specific merits of this proposal, taking account of all the material considerations highlighted above. It is considered that the Council Homes Building Programme is a more effective way to provide conventional affordable housing under current economic climate, to the extent that any departure from the on-site preference of the NPPF, London and Southwark Plan is justified (for the above reasons based on the specific merits of this student housing proposal). The PIL would be required to be paid 25% on implementation of the scheme, 50% on completion of the scheme and 25% 6 months post first occupation of the scheme.

Quality of residential accommodation

Policy background

206. Although student housing falls within the Sui Generis use class, it comes with many of the same functional, amenity and environmental requirements as conventional residential development. As such, it is necessary to give regard to the development plan policies concerned with residential uses when considering the acceptability of student housing proposals.

207. The Southwark Plan does not prescribe any minimum space standards with respect to student accommodation. Policy P15 "Residential Design", which sets out the standards for new homes generally and includes a 17-point criteria, is clearly designed for conventional residential housing. Nevertheless, it is not unreasonable to expect student housing proposals to achieve some of those criteria, namely:

- Criteria 1 - Provide a high standard of quality of accommodation for living conditions;
- Criterion 6 - Provide acceptable levels of natural daylight by providing a window in every habitable room;
- Criterion 7 - Achieve a floor to ceiling height of at least 2.5 metres for at least 75 per cent of the Gross Internal Area of each dwelling to maximise natural ventilation and natural daylight in the dwelling; and
- Criterion 14 - Provide communal facilities.

208. There are no other local-level requirements that student housing proposal should meet in terms of quality of accommodation.

Spatial arrangement

209. Three different 'bedspace' formats are proposed. 81.1% of these (480 of the 592) would take the form of a 13 – 17.5 square metre GIA private en-suite bedroom within a cluster flat, where the occupiers would share an open-plan communal kitchen, living and dining space. The bedrooms would be furnished with a queen size bed, a desk and storage space. The square meterage of the open-plan communal space varies depending on the particular floor of the

building on which the cluster flat is located, as well as in some instances the number of bedspaces within the flat. Majority of these kitchen/living/dining spaces would be more than 27 square metres, with some in excess of 35 square metres and shared by either 6 or 8 occupiers. 8 kitchen/living/dining spaces would be 23.5 square meters which will be shared by 6 occupiers.

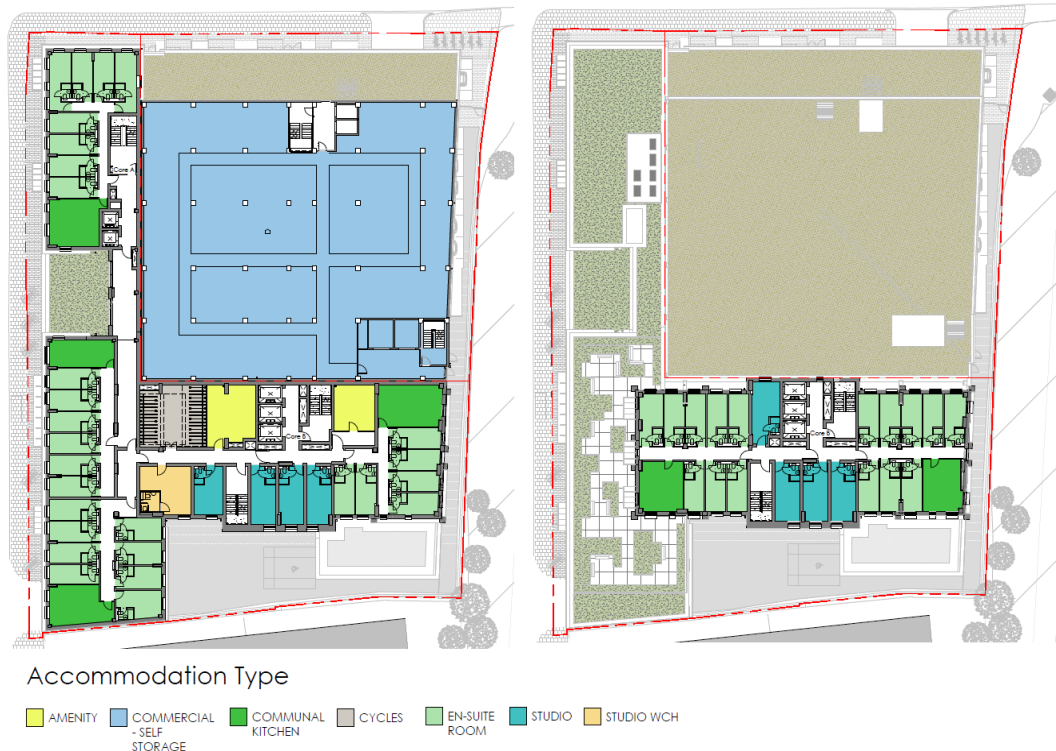


Image 16: Left: Typical layout of the shoulder block (2/F – 9/F), showing the dual aspect nature of the communal kitchen/living/dining spaces of the cluster flats in the Core A (West Core). **Right:** Typical layout of the tower block (12/F – 18/F), showing the dual aspect nature of the communal kitchen/living/dining spaces of the cluster flats

210. The other two 'bedspace' formats proposed are regular studios and accessible studios. The studio typology is a self-contained apartment equipped with a shower room and all the necessary facilities to meet the sleeping, living and food preparation needs of the individual occupier. 82 regular studios and 30 accessible studios are proposed.
211. With regard to the accessible studios, these would range in size from 24.5 to 30.8 square metres GIA. The premium studios are generously proportioned and would provide very good levels of residential amenity for the occupiers.
212. The regular studios would range in size from 18.7 to 22.2 square metres GIA. Although these particular unit types are of an efficient configuration, the layouts submitted as part of the planning application include furnishings to illustrate how queen-sized beds, a desk and storage space could be accommodated in a way that would not be cramped or impractical for use.

The occupier would be expected to dine at their desk. On balance, and taking account of the level of internal communal facilities provided within the PBSA buildings that would supplement the private individual accommodation, the regular studios are considered to be of an adequate size and layout.

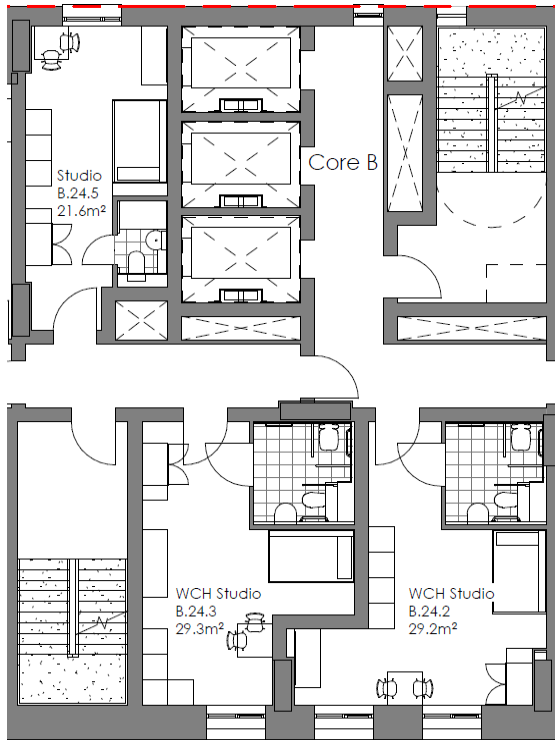


Image 17 Typical layout of the two types of studio

213. All of the accommodation typologies would achieve at least 2.5 metre floor-to-ceiling heights, which is in accordance with Policy P15. This would contribute to the sense of space within these dwelling units.

Environmental comfort

214. The Noise and Vibration Assessment submitted with the application outlines how, through a suitably designed façade and ventilation strategy, the building façade would ensure appropriate internal noise conditions are achieved. 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.

Aspect, outlook and sense of openness

215. Outlook, sense of openness and privacy are all very important considerations for student housing proposals, as unlike conventional housing which provides occupiers with multiple rooms and a variety of outlooks, the bedrooms would be in many cases the only space inhabited by the occupiers, and they would do so for much of the year.

216. It is noted that majority of the bedrooms of the cluster flats and studios would be single-aspect. Where achieving dual aspect has not been feasible, opportunities have been taken where possible to provide these habitable rooms with two windows and 49 of the bedspaces being dual aspect. 75% of the living/kitchen/dinning spaces of the cluster flats (i.e. 48 out of 64) would be dual aspect.
217. For the reasons set out above, and recognising the site's Opportunity Area location and the attendant policy imperative to optimise density through a design-led approach, the outlook and sense of openness for all PBSA occupiers would be acceptable on balance.

Privacy

218. 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.
219. While the above guidelines are helpful in informing decisions about privacy impacts, it is important to recognise that the recommended distances can be applied more flexibly where the rooms under assessment are all proposed (i.e. none are existing).
220. It is noted that the distance between the living/kitchen/dining spaces of the clusters flats in the shoulder block would be 4.9m only which would not meet the guidelines of the Residential Design Standards. However, the applicant has intentionally staggered the western facades to break up the frontages along the Ilderton Road and allow dual aspect of the living/kitchen/dining spaces of the cluster flats. Given the urban context and the other benefits mentioned above, no harmful overlooking is anticipated for any of the PBSA occupiers.

Wheelchair rooms

221. The Building Regulations make clear that student accommodation is to be treated as hotel/motel accommodation for wheelchair specification purposes. As such, Policy E10(H) is the relevant policy to apply in assessing compliance of PBSA wheelchair proposals, as has been clarified by GLA Practice Note 'Wheelchair Accessible and Adaptable Student Accommodation' dated November 2022. In respect of the 592 bedspaces proposed, 30 would be provided to M4(3) standards.
222. Representing 5% of the total number of bedspaces, the wheelchair unit provision would meet the numerical requirements of Southwark Plan Policy

P5. In locational terms, the units would also meet policy requirements, being provided across various floors. This would help achieve social integration.

223. The M4(3) units would ensure options are available for potential wheelchair occupiers who need to move in immediately and could not wait for adaptation works to be carried out (e.g. those have gone through clearing and are applying for accommodation just before the start of term). The wheelchair user accommodation is to be secured through the Section 106 Agreement.

Internal communal facilities

224. In addition to the private and shared spaces within the units themselves, internal communal amenity spaces are proposed. These would be distributed throughout the building to offer a range of different spaces for communal amenity. A series of dining spaces, lounges and gyms are proposed to provide space for occupiers to be social and active. Study spaces incorporating libraries are proposed on the second and third floors of Buildings A and B to facilitate quiet study spaces. Building A would also include a cinema/screening room. The café located on the ground floor represents part of the student amenity offer, however will be publicly accessible.
225. The size of these facilities and their distribution across the two buildings are summarised below:

<u>Internal communal facilities within the PBSA: Summary table</u>		
Floor	Facility	Size (sq. m)
00	Café	109.6
00	Lounge	185.8
01	Student Study Room	168.2
07	Yoga Studio	36.7
08	Cinema room	90
09	Gym	89.4
10	Student Sky Lounge	85.3
Total:		765
Average per PBSA bedspace:		<u>1.29</u>
<i>Not included in calculation</i>	<i>Back-of-house space including laundry facilities, toilets, storage, parcel store, reception/office etc.</i>	

226. As the above table shows, these internal communal amenity spaces would provide on average 1.29 square metres per student. It is noted that this is slightly lower than the levels of internal communal amenity space provided on other student schemes across London and the borough. However, this is primarily because the proposed Student Sky Lounge will have double floor

to ceiling height, which would provide a higher quality of internal community space overlooking the sky garden and is supported. Had this Student Sky Lounge been designed as internal community spaces across two standard floor levels, then the average internal amenity space per student would have been 1.44 square metres, which would be on a par with on other student schemes.

227. Although all the communal amenity facilities would be provided on the lower storeys of the buildings, meaning those residing in studios and cluster flats on the uppermost floors would be some distance away, the facilities need to be concentrated at the base of the buildings for fire safety reasons. In any case, residents living on storeys towards the tops of the buildings would in all probability access the facilities using elevators rather than the staircases, and as such their journey time would be short.



Image 18: (from top-left to bottom-right): Layout of Levels 00, 01, 07, 08-09 and 10 of PBSA building showing how the internal communal facilities would be arranged and the Sky Bar Terrace on Level 10.

228. For the reasons given above, it is considered that a good level and range of internal communal facilities would be provided for the PBSA residents.

Access to outdoor space

229. The proposed PBSA would include Sky Bar Terrace on the 10th floor of the PBSA building exclusively for the student residents. In response to the feedback from the Community Review Panel, the applicant has further

increased the area of Sky Bar Terrace to 274.4 m² which would be overlooked by the internal Student Sky Lounge. This outdoor amenity space would be equipped with seating, soft landscaping, boundary treatments and lighting (details to be secured by conditions). The submitted Noise Impact Assessment has demonstrated that the external sound level of this external amenity space will be below 55 dB LAeq based on the results of the noise modelling, meeting the criteria set out in the standards. In addition, the applicant has agreed to contribute towards publicly open space in the OKR OA (See also 'Off-site (Old Kent Road Opportunity Area) public open space' section).



Image 19: Evening visualisation of the Sky Bar Terrace and Student Sky Lounge

Conclusion on quality of residential accommodation – PBSA

230. The proposal would achieve good quality living accommodation for students. A range of room sizes and shared facilities is proposed, achieving overall acceptable levels of environmental comfort. There has been clear consideration of accessibility, and a financial contribution towards investment in nearby public open space would be secured.
231. For the reasons given above, the proposed PBSA would comply with London Plan Policy H15, while also meeting the four relevant criteria of Southwark Plan Policy P15.

Impact of proposal on development potential of nearby land

232. Southwark Plan Policy P18, which is concerned with the efficient use of land, states that development will be permitted where it would not unreasonably compromise development potential or legitimate activities on neighbouring sites.

Amenity impacts on nearby residential occupiers and the surrounding area

233. 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

234. 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.
235. 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.
236. 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

237. This planning application was accompanied by a daylight, sunlight and overshadowing (DSO) 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. 227 - 255 Ilderton Road

- b. Olive Tree House
- c. Upnall House

238. The above three properties were tested for VSC and NSL impacts, but not illuminance as this method is more appropriately applied to new buildings.

239. The DSO report also undertook testing of:

- d. 14 Sharratt Street (Sankofa Day Nursery) ;
- e. Christ The King Chapel;
- f. 214 Ilderton Road;
- g. 212 Ilderton Road;
- h. 206 – 210 Ilderton Road;
- i. 202 Ilderton Road; and
- j. Canterbury Industrial Estate

240. However, these buildings are non-domestic buildings so even though a number of the rooms/windows do not pass the numerical tests, this does not amount to non-compliance with the BRE requirements

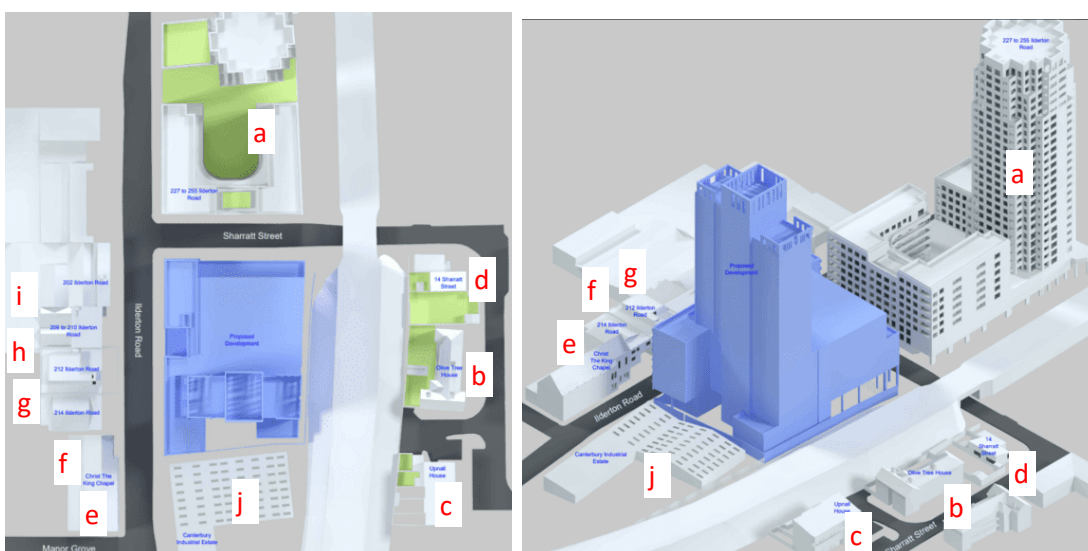


Image 20: Plan of the site within its existing context

VSC and NSL impacts for sensitive surrounding residential properties

241. The table below summarises the VSC impacts to surrounding properties as a result of the proposed development being built-out in the present day context.

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)

227 - 255 Ilderton Road				
Total no. habitable windows tested: 809				
<ul style="list-style-type: none"> • Of the 809 windows, 238 would retain a VSC of 27% or more. • For the <u>571</u> that would not, the distribution of percentage reductions is: 				
Proposed vs existing	442	12	14	103
Olive Tree House				
Total no. habitable room windows tested: 28				
<ul style="list-style-type: none"> • Of the 28 windows, 2 would retain a VSC of 27% or more. • For the <u>26</u> that would not, the distribution of percentage reductions is: 				
Proposed vs existing	1	6	11	8
Upnall House				
Total no. habitable room windows tested: 11				
<ul style="list-style-type: none"> • Of the 11 windows, 8 would retain a VSC of 27% or more. • For the <u>3</u> that would not, the distribution of percentage reductions is: 				
Proposed vs existing	1	2	0	0

242. 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.

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)
227 - 255 Ilderton Road				
Total no. habitable rooms tested: 424				
Proposed vs existing	366	19	9	30

243. The DSO report does not include the NSL results for Olive Tree House and Upnall House. BRE guide (Appendix D) states that the daylight distribution calculation can only be carried out where room layouts are known. Using estimated room layouts is likely to give inaccurate results and is not recommended. Both properties are part of the Lewisham’s Council block and no

internal layout plans of the flats are available.

227 - 255 Ilderton Road

244. 103 windows assessed at 227 - 255 Ilderton Road would undergo a severe loss of VSC. However, 26 of these serve non-habitable rooms or staircases. Out of the 77 affected habitable rooms windows, 48 of them have a low existing VSC value of lower than 27% as daylight is restricted by its own building design. Some of these windows are recessed from the main elevation and some face onto the 9-storey southern should block which sits south of the podium. All of the remaining 29 affected windows would retain an absolute level in excess of 15%, which is not especially low for an urban environment. 12 and 14 windows would be impacted to a minor adverse and moderate adverse level respectively, which would all retain VSC levels not unusual in inner London.
245. In terms of the second daylight assessment, the NSL, the results record 30 rooms assessed would undergo severe loss of NSL. However, 2 of these rooms are non-habitable rooms. 26 of these rooms are bedrooms which tend to be less daylight reliant. The 2 living/dining/kitchen rooms adversely affected are located on the second floor in the middle section the southern shoulder block facing the proposed development. 19 and 9 habitable rooms would undergo a minor adverse and moderate adverse reduction in NSL respectively.
246. It must acknowledge that the proposed scheme has been designed to have a similar shoulder block height and set-back from the footway along Sharratt Street. The commercial building has been further set back at the 6th floor level. In addition, the tower PBSA block is set back substantially from 227 - 255 Ilderton Road.
247. For these reasons, whilst it is acknowledged that the proposed development would result in some reduction in daylight to some occupiers of the 227 - 255 Ilderton Road, the proposed development has been designed to minimise the impacts on these properties whilst optimising the site capacity of the brownfield land to deliver a mixed-use development. On balance, it is therefore considered that the impacts on these occupiers would be acceptable.

Olive Tree House

248. While there would be a large number adverse reductions to VSC at Oliver Tree House, these adversely affected windows are located on the ground floor and first floors and have a low existing VSC value of between 11.9% and 14.9% largely due to the existing deck access. While the impacts are recognised, on balance the retained daylight level would be acceptable having regard to the site location.



Image 21: *Aerial photo of Oliver House showing the existing deck access*

Upnall House

249. Only two windows tested would not meet the BRE default VSC target and they would all constitute 'minor adverse' transgressions. When considering the retained levels of VSC for most of the Upnall House, the effects of the proposed development would not be harmful to the amenity of the Upnall House residents.

Sunlight

250. The applicant's DSO 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.
251. 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.
252. 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.
253. 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.
254. The 10 properties assessed for daylight impacts have also been assessed for sunlight impacts; none of these properties no breaches of the BRE guidelines were recorded.

Conclusion on daylight and sunlight

255. In total, the development would result in 20 minor, 25 moderate and 111 substantial adverse reductions in VSC for surrounding properties. With respect to NSL, among the properties assessed, there would be 30 substantial reductions for flats at 227-255 Ilderton Road which is undergoing construction (known as the Leatham's scheme). 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.

256. Regarding sunlight, none of the residential properties would experience impacts beyond the recommendations of the BRE.
257. Given the site's 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. While some noticeable relative changes in daylight amenity would occur at a number of residential properties surrounding the site, the retained daylight levels would be commensurate with those typical to other Growth and Opportunity Areas across London. There are also a large number of residential properties surrounding the application site that will satisfy the recommendations of the BRE Guidance in that they will not experience any noticeable alterations in daylight or sunlight as a result of the implementation of the proposed development.

Solar glare

258. During the course of this application, the applicant has confirmed that the black cladding proposed on the façade of the commercial building will have a matte finish and therefore will not present a glare issue on the neighbouring Leatham's scheme. Any advertisement on the commercial building will also be subject to a separate advertisement consent application. It is therefore considered that any harmful environmental effects caused by the development in respect of solar glare would be unlikely.

Overshadowing

259. The test promoted by the BRE for assessing overshadowing impacts on external amenity spaces 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. If as a result of new development an existing garden or amenity area does not meet the above, and the area which can receive two hours of sunlight on 21 March is less than 0.8 times its former value, then the loss of light is likely to be noticeable.
260. The DSO assesses all surrounding private amenity areas for overshadowing impacts and finds that majority of them achieve 50% sunlight coverage for two hours on the Equinox or retain 0.8 times their former values, as set out in the BRE Guideline with exception of the communal podium garden at 227-255 Ilderton Road.
261. This communal garden is located on the second floor and is partially enclosed by a U-shaped, nine-storey shoulder block, which reduces sunlight in the southern part of the garden. The proposed development (23/AP/1317) is

expected to further decrease the area receiving two hours of sunlight on 21 March from 45% to 32%. While this reduction in sunlight is not ideal, the proposed development has been designed to minimise its impact by placing the tower block away from the garden. It is anticipated that a reasonable amount of sunlight will still reach the communal garden, particularly during the summer months when overshadowing will be less pronounced and the garden is more frequently used. The impact would not be detrimental to the living condition of the occupiers of 227-255 Ilderton Road. It is therefore considered no external amenity areas at nearby properties would be subject to harmful overshadowing.

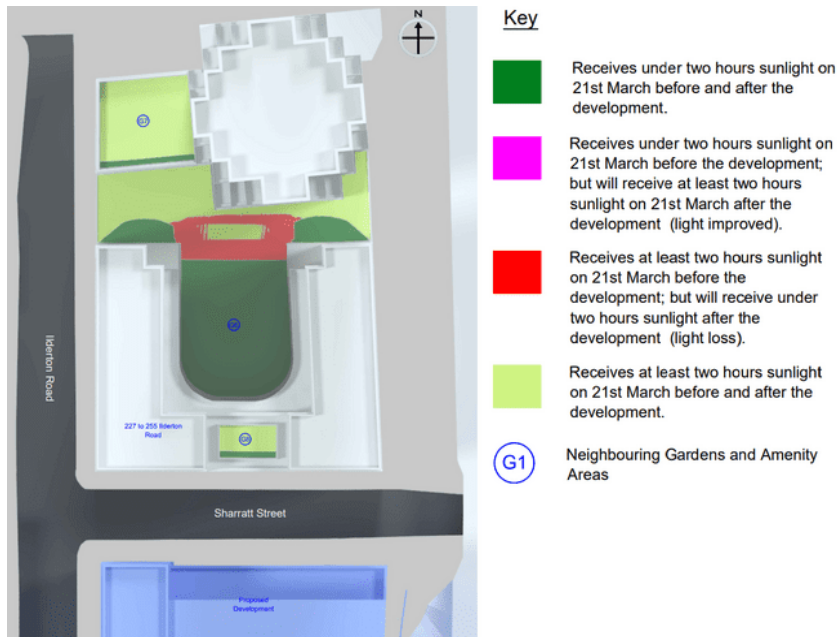


Image 22: Overshadowing to the podium at 227-255 Ilderton Road.

Outlook and sense of enclosure

262. 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 an L-shaped shoulder block and a tower block. The tower block will be sited substantially away from the tower block at 227 – 255 Ilderton Road. Hence, views ‘through’ would be possible, opening up views of the sky for residents of the existing nearby dwellings. Incorporation of high quality materials and low-level greening throughout the development would give complexity and visual relief to building forms, 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.

Privacy

263. 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.
264. All the 'across street' distances between the development and habitable residential rooms opposite would exceed 12 metres. The closest distance between the proposed development and any neighbouring residential building is 15 metres (to the flatted development at 227-255 Ilderton Road) The separation distance from the proposed development to Oliver Tree House would be 25 metres. In summary, since the guidelines of the Residential Design Standards would be achieved, no privacy infringement issues are raised.

Management and maintenance of the PBSA

265. The Council's 2015 Technical Update to the Residential Design Standards requires student housing proposal to be accompanied by details of the long-term management and maintenance arrangements of the student accommodation, including details of security. This is in the interests of ensuring that, once operational, the development:
- 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
266. The PBSA units will be owned/operated by the applicant and managed by Fresh. A Draft Management Plan has been submitted in support of the planning application, which sets out how the proposed development will be managed and maintained. With regard to the management of the scheme, the Draft Management Plan makes the following main provisions:
- Anti-social behaviour:
 - operates a 4-tier escalation process to deal with anti-social behaviour and will work closely with the universities and their disciplinary procedures.
 - Security
 - CCTV cameras in and around the building will be fed back to the management office to allow monitoring of incidents and potential incidents;
 - There will also be an electronic access control system to prevent unauthorised access into the flats; and

- 2-3 dedicated security staff will be employed for the site who will provide onsite out of hours service to the students.

267. On account of the above, it is considered that sufficient information has been provided to address the requirements of the SPD. A finalised version of the Student Management Plan will be secured through the Section 106 Agreement to ensure the day-to-day operation of the student accommodation would not cause harm to the amenity of surrounding residents.

Noise and vibration

Plant noise

268. Plant (power, heating and cooling machinery) would be contained within the ground of the commercial use building and ground floor and first floor levels of the proposed PBSA building. Both proposed buildings would also contain rooftop plant albeit the full details of plant are not currently known.
269. 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

270. In terms of public noise nuisance from the development for surrounding residents, a Student Management Plan will be secured through the Section 106 Agreement to ensure the operation of the PBSA would limit sources of human noise disturbance to neighbours.
271. The only other potential sources of public noise nuisance are the proposed self storage (Use class B8) and light industrial Fab Labs (Use Class E(g)(iii)). In order to limit any risk of public noise nuisance, it is recommended that opening hours limitations be imposed on these non-domestic units as follows:
- 07:00-23:00 on Mondays to Sundays (including Bank Holidays).
272. A separate condition is proposed to control the hours of servicing/deliveries to these non-domestic uses as follows:
- 08.00 to 20.00 on Monday to Saturdays; and
 - 10.00 to 16.00 on Sundays and Bank Holidays.

Vibration

273. The Noise and Vibration Assessment indicates no adverse impact from potential vibration sources. The Environmental Protection Team has reviewed it and confirmed it is acceptable.

Odour

Extraction and ventilation equipment

274. During the course of this application, the applicant has introduced a café within the PBSA as suggested by the Community Review Panel. An updated Ventilation Statement has been submitted. It outlines a possible odour abatement scheme for the 'community café'. The Ventilation Statement suggests that the system will either be mounted at high level and connect to atmosphere via an architectural weatherproof louvre installed in the façade, or a ducted system routed to the level 14 roof. The Environmental Protection Team confirmed that the proposed outline scheme is suitable in principle and recommended specific details to be discharged once the details are known at a later stage of the development. A condition is therefore recommended to seek details of any extraction and ventilation system for approval prior to the installation of any such system in order to ensure the final ventilation specification is suitable while preserving the architectural integrity of the proposed development with its appurtenance-free façade which is considered to be of importance to the success of the development in terms of its townscape role.
275. Since there is a potential for the proposed light industrial units as commercial kitchens under general permitted development rights. For safeguarding purpose, upon the request from the Environmental Protection Team, a standard condition is also recommended to details of any extraction and ventilation system if such use arises.

Design

276. 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.
277. 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.
278. 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.

279. 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.

280. 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.

281. 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.

282. There are conservation areas and listed buildings in the vicinity of the application site, and the draft OKR AAP identifies buildings of townscape merit and architectural or historic interest nearby. The draft AAP identifies the cluster as an appropriate for a mix of Tier 1 (above 20 storeys), Tier 2 (16 to 20 storeys) and Tier 3 (up to 15 storeys) tall buildings, with an expectation that the height of

the tower would be the same as that in the Bermondsey Heights scheme at 227-255 Ilderton Road.

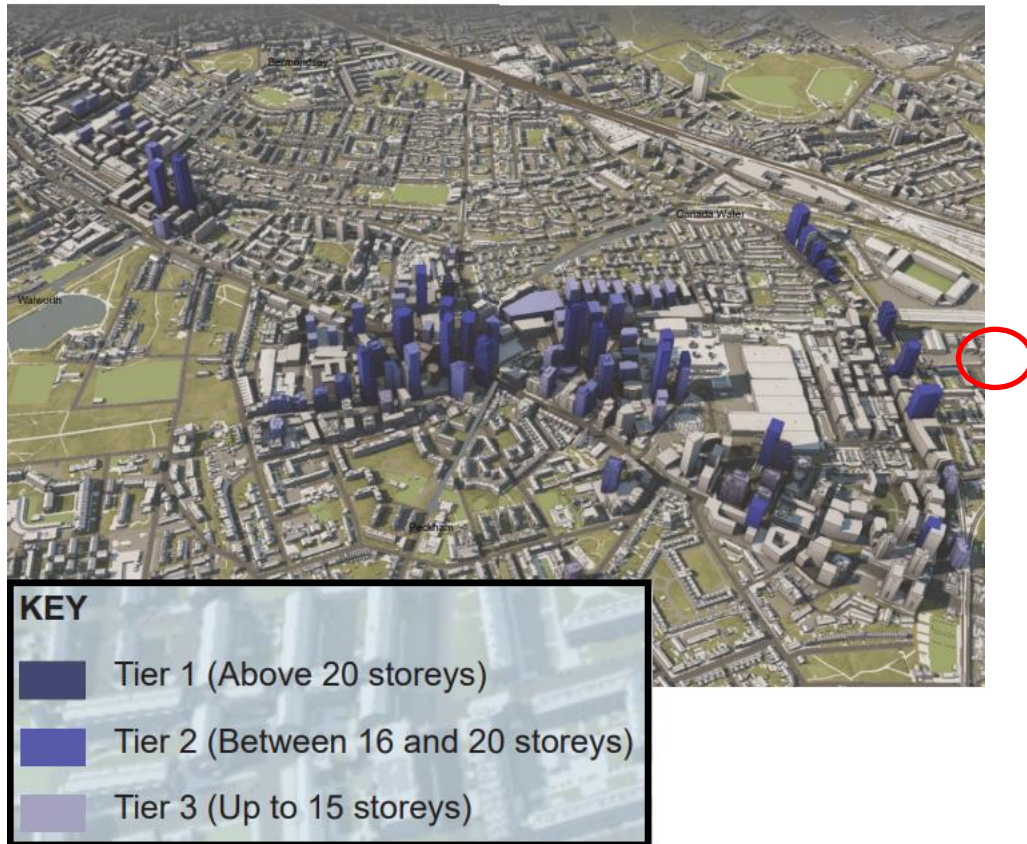


Image 23: (above): The Stations and The Crossings strategy from the draft Old Kent Road AAP, showing the distribution of tall buildings across the action area, including cluster at the new tube station where the site is located (circled in red), and these tall buildings' relationship to London and borough views.

Site layout and public realm

283. The existing urban grain is varied, featuring a mix of housing dating from various eras and in a range of formats and heights; and larger commercial warehouses. As previously mentioned, the application site is brownfield land within the Old Kent Road Opportunity Area. It is also subject to site allocations in the Southwark Plan and draft OKR AAP.
284. Characterised by a low-rise building, large areas of surface parking and high palisade fencing, the existing site makes no meaningful contribution to Ilderton Road or Sharratt Street.
285. The arrangement of the proposed buildings conforms broadly to the massing composition and guidelines in the draft OKR AAP, and is a logical response to the shape of the site. The proposed layout of the buildings would instate a strong urban edge, establishing positive frontages along the Ilderton Road and Sharratt Street. The buildings have been set back to enable the delivery of enhanced hard- and soft-landscaped public realm including new tree planting along Ilderton Road and Sharratt Street.

286. Entrances and public-facing non-residential uses have been located on the principal frontages (Ilderton Road and Sharratt Street). The PBSA lobbies and the entrances of all the Fab-Labs and self-storage would all bring activation at ground level. Further activation would come from the glazed frontages of the PBSA café and reception rooms. Cycle stores and ancillary uses have been appropriately located to minimise the extent of inactive frontage.
287. In summary, the proposed site layout is well conceived, providing improved frontages along the Ilderton Road and Sharratt Street with more generous public realm and enhanced soft landscaping. This aligns fully with the ambitions of the Southwark Plan to foster mixed and inclusive communities.

Height, scale, massing and tall building considerations

288. The application proposes two buildings – the PBSA block has a shoulder block height of 10 storeys with a tower which would be 30 storeys located in the southern part of the site. The commercial building will have a height of 5 storeys and rise to 10-storeys along Sharratt Street.
289. The tower block constitutes a Tier 1 building - which the draft OKR AAP identifies as acceptable. The tower is located at the site's southern site which would have the same height as that of the adjacent Bermondsey Heights scheme at 227-255 Ilderton Road and maximise the distance from the tower at 227-255 Ilderton Road. For these reasons, the proposal would broadly cohere the height strategy along eastern side of Ilderton Road envisioned in the draft AAP.



Image 24 (from left): West elevation and roof plan across Ilderton Road; Axonometric view across Ilderton Road.

290. With regard specifically to massing, during the course of this application, the applicant has revised the scheme to emphasize the proportionality of the tall building by providing a 4-bay frame across the body of the wings and expressing

the slenderer profile of the tower with the inclusion of a canopy to crown the building. As a result, the proposed buildings would possess a strong sense of verticality, attributable largely to their gridded frame reducing their apparent width.

291. The proposed strong and distinguished bases of the buildings would relate positively to the proposed public realm, their architectural detailing providing a human scale to the development and adding interest in close-range views. In longer-range and wider townscape views, the development is successful in providing further articulation to the massing and skyline.
292. 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 substantial harm to designated London wide or local protected views.
293. With regard to policy compliance with London Plan Policy D9 and Southwark Plan Policy P17, the following aspects are of consideration:

Landscape contribution

294. The proposal provides a number of improvements to the existing streets, including the landscaping of Ilderton Road and Sharratt Street. These are considered to commensurate with the scale of development.

Highest architectural standard

295. 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. Both buildings would successfully achieve a distinguished base, middle and top. The varied approach to the architectural design of the typologies will ensure the scheme makes a dynamic addition to the skyline. It would deliver high-performance PBSA housing as well as commercial floorspace. The architecture and detailed design is well considered, in both its appearance in immediate and longer-range views.

Relates well to its surroundings

296. At ground floor level, two-storey spaces would be provided, framing entrance spaces and providing glazed frontages onto the streets. The development ensures sufficient activation is provided, presenting accessible and welcoming entrances. Through the incorporation of glazing there will be a positive relationship between internal and external uses. The architectural design and composition of the buildings will aid legibility and wayfinding in mid-range and longer range views.



Image 25 (above): View looking on the western side of Ilderton Road

297. The proposed development responds positively, to the local character and will make a positive contribution to the townscape.

Positive contribution to the London skyline

298. The development would form part of a cluster of emerging large-scale buildings around the planned tube station, a number of which benefit from planning permission. The proposed scale of the development –with the heights stepping up from the Ilderton Road to the eastern part of the site towards the railway – is consistent with the heights promoted on this particular site in the AAP, and the ‘Stations and Crossings’ strategy more generally. The varied distribution of heights will facilitate an articulated skyline, defining a set of marker buildings to aid way finding.
299. The cumulative impact has been assessed as part of the applicant’s TVIA, which includes consideration of the proposed development within the cumulative context of existing proposed future developments and planning consents. The TVIA demonstrates that the scale, form and massing of the development would be consistent with the emerging context. By reason of the proposal’s massing and architectural treatment, its skyline contribution would be positive, providing a slender profile to the tallest block, with a well-articulated family of markedly lower buildings surrounding it.

Free-to-enter publicly-accessible areas

300. The proposals would deliver widened footways supplemented by planters and new street trees.

Mitigated environmental impacts

301. 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. The technical reports assess these matters comprehensively, and conclude that with mitigation secured, no major adverse long-term effects would arise.

Conclusion on massing, height, scale and tall building considerations

302. In summary, although the proposed development –constituting a Tier 1 building and a Tier 3 building– would mark a step change in the scale of the immediate area's built scale, this is considered to be in line with the 'Stations and Crossings' building heights strategy in the draft AAP. Formed of a family of confident and carefully modelled buildings with activation of the streets, the development would repair a long-standing gap along Ilderton Road. It would play its role in delivering the series of tall building clusters planned along the Ilderton Road, while also making a beneficial contribution to the local townscape.
303. Overall, and having taken account of the effects arising cumulatively with other existing, consented and planned tall buildings nearby, the development's design would be exemplary, thereby meeting 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

304. 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.
305. Through the use of common architectural language, the PBSA building and the commercial building are read as a coherent development. During the course of this application, the Applicant has further considered the junction between the PBSA and commercial building with a recess to create a clear break between the two uses.
306. To enable legibility across the development, the design and materiality of the ground floors would vary from the upper floors. The base of buildings accommodating the community café, PBSA lobby, communal amenity facilities, individual Fab Labs units and the self-storage entrance will be in black, grey brick with light mortar which would complement the bricks finishes of the upper floors. Canopies have been included for the entrances of the PBSA and Fab

Labs to improve legibility and add variation to the façade, as well as to avoid downwash effect (See also Micro-climate section).



Image 26 (above): Typical elevation of the buildings. (a) shoulder block of the PBSA (top-left), (b) the wings of the tower block (top-right); (c) central section of tower block (bottom-left); (4) Fab Labs (bottom-right)

307. The applicant has proposed a red brick mixture finish which would complement the prevailing exterior finishes in the area including the bricks used in the Christ the King Chapel on Ilderton Road opposite and the Bermondsey Heights at 227-255 Ilderton Road. Recessed windows and projecting brick overhang are employed to create variation in the facades of the buildings. 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.

308. 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.
309. 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. Additional to this, a condition is recommended requiring full scale mock-ups of the façade panels of the towers to be built on site and presented for officers' approval. A signage strategy will also be secured via a condition to ensure that high quality, consistent and coordinated signage is installed across all non-residential frontages within the development.
310. 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

Statutory designated heritage assets

311. The application site does not sit within a conservation area and it contains no listed buildings. There is however, one conservation area within 1km of the site, meaning that their settings could be impacted upon by the proposed development. The conservation area is listed below.

Table: Conservation areas within 1km of the application site

Conservation Area	Distance from Application Site
Caroline Gardens Conservation Area	Approximately 520m

312. Also within the area between the subject site and Caroline Gardens are a number of Grade II listed buildings and structures, including the following:
- Nos. 864 and 866 Old Kent Road;
 - Nos. 880, 882 and 884 Old Kent Road;
 - Licensed Victuallers Benevolent Institution (Caroline Gardens);
 - Licensed Victuallers Almhouses (Caroline Gardens);
 - Gasholders Nos.13

Non-designated heritage assets

313. These following buildings within or immediately adjacent to the application site are included on the Local List published by the Council in December 2023:

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

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

Townscape and Visual Impact Assessment (TVIA)

314. A Townscape and Visual Impact Assessment (TVIA) has been submitted in support of this application. A number of conservation areas and listed buildings fall within this radius, as do buildings on the local list. The 'townscape' element of the TVIA considers the impact of the proposed scheme from seven different viewpoints and includes consideration of cumulative impact.



Image 27 (above): Map showing the seven local verified viewpoints assessed in the TVIA

London Strategic views

315. 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. LVMF 2A.1 Parliament Hill: the summit (looking toward St Paul's Cathedral) is potentially sensitive to development at the application site, and as such the TVIA has tested the impact of the proposed development within this view.

316. While the development will be partly visible in View 2A.1, it was previously concluded that the Bermondsey Heights scheme due to the degree of its visibility, which is limited, and its distance from St Paul's Cathedral in the view mean that it would not harm the view or the ability to appreciate and understand St Paul's in the view. The proposed tower would not be higher than Bermondsey Heights. It is likely that it would be seen as a relatively small part of the backdrop development in the view's wider context and would not particularly impinge on St Paul's Cathedral. Overall, there would be little impact on the protected LVMF views.

Borough views

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

Designated Heritage Assets

Caroline Gardens Conservation Area

318. The northern parts of the conservation area are within 60 metres of the site. Part of the wider setting of the conservation area includes views to it and its listed heritage assets across the car park of the adjacent Lidl supermarket, something that significantly detracts from the conservation area. It is considered that the proposed development would not result in any harm to the setting of the conservation area.

319.	Viewpoint 10	
	View location	North Lodge to Licensed Victuallers Benevolent Institution (Caroline Gardens) looking northeast
	Heritage Significance	High
	Sensitivity to change	Low – given the separation distance (circa 540 metres) between the development site and the listed buildings
	Impact of proposal	The proposed development would result in the addition of considerable height and scale compared to the middle distance of the view. However, in this context, it is not considered to harm the setting of the listed buildings given the aforementioned separation distance as well as the emerging context of new developments envisioned in the Draft OKR AAP.
	Historic England Comments	None
	Conclusion	It is not considered that the special architectural or historic interests of the listed building or their setting would be harmed from this development.



Image 28 (above): Verified view from Caroline Gardens towards the application site in the existing condition.



Image 29 (above): Verified view across Caroline Gardens in the proposed scenario, showing the proposed development (in full render) in the centreground, the development at 227-255 Ilderton Road (known as Leatham scheme) which is under construction (in green) and the Ilderton Wharf scheme (in blue)

Listed Heritage Assets

Gas Holder 13 (Grade II listed)

320. This is an engineering structure of significant scale and presence. The proposed development is 400 metres away from the gasholder. The proposed development would interrupt this mid-range views towards the gasholder from Bridgehouse Meadows. However, the other views towards the gasholder would remain intact. The proposed development is considered to be harmful to the setting of the listed building albeit at the lower end of the scale of less than substantial in the context of the emerging townscape envisioned in the draft OKR AAP and outweighed by the scheme's public benefits.

321.	Viewpoint 1	
	View location	Bridgehouse Meadows
	Heritage Significance	Gasholder no. 13 is visible in this viewpoint and is identified as a Grade II Listed structure within Southwark
	Sensitivity to Change	High
	Impact of proposal	From this location, the wider setting of London can be seen, with local residential developments in the foreground just beyond the trainline, then a mix of industrial developments and high-rise residential developments around the local boroughs in the background, plus uninterrupted views all the way into central London, showing the highly developed urban core of the city. It is noted that once construction at Ilderton Road has been completed, from this location the development will significantly break the skyline and interrupt the mid-range view toward the Grade II listed gasholder.
	Historic England Comments	None
	Conclusion	The proposed development would result in less than substantial harm on the setting of the Grade II Listed Gasholder no. 13.



Image 30 (above): Verified view across Bridgehouse Meadows towards the application site in the existing condition.



Image 31 (above): Verified view across Bridgehouse Meadows in the proposed scenario, showing the proposed development (in full render) in the centreground, the development at 227-255 Ilderton Road (known as Leatham scheme) which is under construction (in green) and the Ilderton Wharf scheme (in blue)

322.	Viewpoint 3	
View location	Junction of Commercial Way and Old Kent Road	
Heritage Significance	Gasholder no. 13 is visible in this viewpoint and is identified as a Grade II Listed structure within Southwark	
Sensitivity to change	High	
Impact of proposal	This view looks southeast with the Gasholder visible to the left of centre with the roof of the Southwark Recycling centre visible in the distance, with the Hertz Car Rental Company visible in front centre of this view. The proposed tower block would be visible in the distance in the centre of the photo and would not impede on the views of the Grade II listed Gasholder no. 13	
Historic England Comments	None	
Conclusion	As the proposal is located away from the main viewpoint of the listed Gasholder no. 13, it would not harm the significance of the heritage asset.	



Image 32 (above): Verified view across Old Kent Road and the gas holder towards the application site in the existing condition.



Image 33 (above): Verified view across Old Kent Road and the gas holder in the proposed scenario, showing the proposed development (in full render) in the centreground, the development at 227-255 Ilderton Road (known as Leatham scheme) which is under construction (in green) and the Ilderton Wharf scheme (in blue)

Caroline Gardens (Grade II listed)

323. Caroline Gardens are the Grade II listed, and an intrinsic part of their setting is the landscaped gardens. The buildings sit on the cusp of the high street/arterial highway character of the Old Kent Road and the surviving leafy suburbia of Peckham New Town to the south east. Views from within the gardens have since the 1870's included views of listed Gas Holder 13 and would have in the past included other gas holders and the gas works coking plant which has been since demolished. The formal symmetry of the listed building is probably best appreciated by a view on axis with the chapel. As discussed in the earlier part of this report, within this view the development appears on the periphery creating little harm to the buildings' setting.

Non-designated heritage assets

324. Whilst some locally listed buildings are located nearby to the development, given their distance from the proposed development, their significance would not be impacted by the proposed development directly or indirectly.

Conclusion on heritage and townscape impact

325. There would be some harm to the setting of the designated Grade II listed Gasholder as a result of the development due to the interruption of the mid-range views from Bridgehouse Meadows but this would be at the lower end of

the scale of less than significant harm and is clearly outweighed by the public benefits of the scheme. These benefits include provision of affordable workspace and public realm improvement along Ilderton Road and Sharratt Street. The scheme is therefore considered to be acceptable in respect of heritage matters.

Inclusive access

326. 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.
327. The various inclusive access measures within the proposal would include:
- all uses to have step-free access through flat finished floor levels or lift arrangements;
 - lift access to be provided to all levels within the building
 - cycle storage provision to allow for larger cycles such as cargo cycles, purpose built cycles for disabled people and tricycles; and

Designing-out crime

328. 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.
329. 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; and
 - designing all cycle store room to be open-plan, well-surveilled and secure.
330. 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 and Final Security Surveillance Equipment Strategy condition are recommended.

Community Review Panel

331. The proposals were reviewed by the Council's Community Review Panel on two occasions at both the pre-application and application stages. The first review on the mixed use development with conventional housing took place November

2022, and the revised proposals with PBSA were brought back for a second review in January 2024. The opportunity not only to review the scheme, but to see how it had evolved in response to earlier comments, was strongly welcomed by the Panel.

332. At the second review, the Panel commended that as a standalone design, the development has a number of positive elements but was concerned about the scheme's role in the neighbourhood and its contribution to the local community. The panel has reservations about whether PBSA is needed in the area and suggests that increasing conventional housing provision for local people would be preferable. The Panel's feedback was summarised as follows:
- Purpose Built Student Accommodation
 - Suggested further work to ensure that the scheme contributes positively to an inclusive neighbourhood, for example, by designing the building as a clearer destination point to attract local people, and creating greater opportunities for interaction between the local community and the student population if a need for student accommodation has been identified for these facilities in the area
 - Concerned about the affordability of the student accommodation.
 - Commercial development
 - The provision and quality of the light industrial spaces is well-received, and their potential synergy with the self-storage facility.
 - The scheme has the potential to contribute positively to regenerating the Old Kent Road.
 - Landscaping
 - Greening and biodiversity opportunities offered by the roof areas were welcome
 - Suggested increase residents' access to these spaces
 - Height and architecture
 - Considered the 30 storeys tower too high, and that the materials and façade design may contribute to an overbearing appearance on the skyline.
 - The design of the self-storage frontage is successful
 - Supported the use of the red brick in the scheme and suggested further consideration on the overall material palette.

333. A full account of the feedback from both rounds of the Community Review Panel is provided at Appendix 6 of this committee report. Officers consider that the applicant has positively addressed feedback from the Community Review Panel and revised the scheme accordingly and satisfactory justifications have been provided where it is not feasible to make the suggested changes.

Conclusion on design

334. The design of the proposal evolved through the pre-application and planning application stages in direct response to independent design scrutiny from the

Southwark Design Review Panel and two rounds of the Old Kent Road Community Review Panel. Extensive engagement with council officers and other bodies including the GLA and HSE also informed this iterative design process.

335. The relative heights of the proposed buildings and their distribution across the site is logical and responds appropriately to the existing and emerging context, while also being broadly consistent with the tall buildings policy of the draft AAP. The proposal meets the Southwark Plan and London Plan tall building tests, and overall it is considered that the scale and massing of the proposal can be accommodated without undue harm to the established townscape. 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.
336. 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, with some less than substantial (but outweighed) harm caused in one instance due to the interruption of the mid-range views from Bridgehouse Meadows, and would make a positive contribution to the wider townscape character in majority of the instances. 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.
337. Inclusive design and crime minimisation considerations have all been resolved to an acceptable level of detail.
338. For the reasons given above, it is considered that an acceptable quality of design would be achieved.

Public realm, landscaping and trees

339. 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.
340. 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 (including student housing). 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.

341. 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.

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

342. The proposal hereunder consideration would deliver the equivalent of 237 dwellings, producing a requirement for 1,184 square metres of public open space.
343. This yield cannot be delivered as part of the proposed development due to the constrained nature of the plot. Applying the £205 multiplier, this generates an in-lieu contribution of **£242,720** (index linked) which would be secured through an obligation in the Section 106 Agreement.

Landscaping

344. On the ground floor level, the two street frontages will form an attractive public realm which will encourage people to walk and cycle. The landscape design of the site will consist of a clear hierarchy of green infrastructure and a robust palette of hard materials. Although the planting schedules are indicative at this stage, they nevertheless comprise a good mix of drought tolerant and sun-loving species, as well as an appropriate ratio of evergreen to deciduous.



Image 34 (above): Roof plan showing the landscaping arrangement

345. For the roof terrace, following the feedback from the Community Review Panel, the applicant has revised the depth, sizes and layout of planters to create more open space. It will feature garden rooms created with planters and seating to create social spaces. 3no. multi-stem trees added to the inaccessible planter -

for better outlook onto green space and low level planting to the perimeter (depth 1.0m) to increase pockets of accessible space.



Image 35: Visualisation of the roof terrace

Trees

346. A Tree Survey and Arboricultural Impact Assessment accompany the planning application. The Tree Survey identifies no arboricultural features within the application site and 4 features on land adjacent to the site. These 4 features comprise 4 individuals and 1 group, to which the Tree Survey attributes Category C
347. The Council's Urban Forester has appraised the Arboricultural Impact Assessment and Method Statement, and has deemed them acceptable.
348. This planning application proposes to plant a total of 14 new trees along Ilderton Road. The indicative details suggest that a variety of native species and tree sizes would be included. 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. The Council's Urban Forester has assessed these proposals and raised no objection.
349. 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. Final details are to be secured through planning conditions and obligations.
350. 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

351. The scheme would significantly enhance the streetscape on Ilderton Road and Sharratt Street with widen footway, new tree planting and hard and soft landscaping and active frontage. A robust palette of hard finishes would be paired with a diverse specification of planting, completed by a scheme of lighting appropriate to the context and mindful of public safety and biodiversity. A total of 68 new trees would be planted, with all 18 existing trees and groups to be

retained, making a major contribution to the Opportunity Area's green infrastructure.

352. 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.
353. Through the Section 106 Agreement, a contribution of £181,435.00 will be secured, to be put towards the delivery of off-site (Old Kent Road Opportunity Area) public open space. The Section 106 Agreement will also include a payment-in-lieu mechanism in the (albeit unlikely) event of the developer failing to deliver any of the 68 trees proposed.

Green infrastructure, ecology and biodiversity

354. 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/1317 falls within the latter category.
355. In England, Biodiversity Net Gain is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). This statutory framework is referred to as 'biodiversity net gain' in Planning Practice Guidance to distinguish it from other or more general biodiversity gains
356. There are statutory exemptions and transitional arrangements which mean that the mandatory Biodiversity Gain condition does not always apply. This application has been assessed as being exempt as the development is not 'major development' (within the meaning of article 2(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015) where the application for planning permission was made before 2 April 2024.
357. 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.
358. 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

359. The proposal would achieve a UGF score of 0.4 through a combination of these principal elements:
- 214 square metres of intensive green roof with substrate of minimum settled depth of 150mm
 - 89.6 square metres of 'larger' tree coverage (trees planted in connected pits with soil volumes to at least two thirds of the projected tree canopy);
 - 1432 square metres of extensive green roof;
 - 176 square metres of green wall (modular system); and
 - 310 square metres of permeable paving
 -
360. 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 0.4 UGF.

Ecology

361. An Ecological Appraisal accompanies the planning application. It notes the following:
- No roosting bats or signs of roosting bats were observed. No bats were observed to emerge from the building during the survey;
 - Low activity from common pipistrelle *Pipistrellus pipistrellus* was heard off site on the adjacent trainline habitat to the east. Measures to avoid disrupting foraging and commuting bats are therefore provided;
 - habitat suitable for breeding birds is present – Precautionary measures would be taken to avoid killing birds or destroying their nests;
 - a range of measures should be undertaken to satisfy the requirement for ecological enhancement included in planning policy.
362. Upon request from the Ecology Officer and the GLA's comments, the Applicant has also revised the Ecological and Biodiversity Assessment to consider the impacts of light spill, shading and noise during construction and operation on the adjoining SINC along the rail embankments.
363. The site contains Jersey cudweed (*Gnaphalium luteoalbum*), a schedule 8 protected plant species. A condition is recommended to seek submission of a copy of the EPS Licence to ensure the applicant has obtained a licence from Natural England detailing the mitigation strategy required for works which may kill/uproot the plant.
364. A green wall is proposed along the eastern boundary of the site adjoining the railway embankment SINC. Upon the request from the Council's

Ecology Officer, the applicant has explored enlarging the buffer with wider planting beds at ground level. However, this is not considered feasible as 1.2m wide clear width path is needed for fire emergency access and maintenance of the vertical planting structure.

365. The revised Ecological Appraisal concluded that provided the measures set out in the Appraisal are adhered to, all identified impacts to ecological receptors will have been addressed, with no residual impacts subject to a condition for Construction Environmental Impact Assessment and the external lighting details.
366. Upon the request from the Council's Ecology Officer, the applicant has also provided an updated Bat Survey which concludes that no evidence of roosting bats was recorded within any of the buildings on Site. Provided sensitive artificial lighting is employed during the construction and operational phase of development, the proposed development is considered unlikely to impact foraging or commuting bats using the site.
367. With a condition requiring the proposed development to be constructed in accordance with the Ecological Appraisal, the ecological impacts of the development would be mitigated, in compliance with Policies P59 and P60 of the Southwark Plan.

Biodiversity

368. The applicant's Biodiversity Net Gain Assessment found the site to have a baseline score of 0.12 habitat units. This relatively low score is attributable to the site coverage mainly comprising buildings, areas of hardstanding and bare ground, with only some introduced shrub. As a consequence of the proposed development, the biodiversity score of the site would increase by 0.41 habitat units to a new score of 0.53, representing a gain of 350.07% on the baseline.
369. Given the delivery of on-site biodiversity net gain is one of the planning benefits of the proposed development, a planning condition is recommended requiring the submission of Landscape and Ecological Management Plan. The purpose of the plan is to ensure the new habitats delivered as part of the development are managed and sustained appropriately for 30 years.

Conclusion on urban greening, ecology and biodiversity

370. The provision of urban greening is welcomed, with conditions to secure the provision of features within the building fabric to support local biodiversity (10 Swift nesting bricks, 5 bat bricks/tubes and 2 bee bricks and/or invertebrate hotels), along with biodiversity audits for a 30-year period. A two-part condition will be imposed to ensure the development is built-out to achieve the 0.4 UGF score.

Archaeology

371. The site is located within the 'North Southwark and Roman Roads' Archaeological Priority Area and is of geo-archaeological significance. The planning application is supported by a desk-based assessment that provides a clear baseline of data concerning the level of archaeological work undertaken at surrounding sites. The previous archaeological evaluation work on site has demonstrated that no archaeological response is necessary for this application.

Transport and highways

Healthy Streets

372. 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. These indicators are intended to inform design, management and use of public spaces in order to place people and people's health at the forefront of development decisions.

Enhancements to the pedestrian and cycle environment on-site

373. Given the set-back of the proposed buildings, the footways on both Ilderton Road and Sharratt Street will be widened together with 14 new street trees and 22 visitor cycle parking spaces on the street. Part of the widened footways will be adopted by the Council. These Healthy Streets improvements would be secured through a Section 38/278 Agreement.
374. It is noted that the width of the proposed crossovers is greater than 3.0 metres. The Transport Policy Offer and Highways Officer have confirmed that these are acceptable in this instance as the width have been minimised and is necessary to ensure on-site delivery. The existing crossovers and accesses that will be taken out of use due to the development proposals as they stand would also be removed and full kerb-height footway will be restored as part of a s278 agreement at applicant cost.

Enhancements to the existing highways network adjacent to the site

375. A contribution of £100,000 is to be secured in the Section 106 Agreement to improve both the northbound and short bound bus stops on Ilderton Road.
376. Furthermore, the applicant is committed to provide a new raised zebra crossing on Ilderton Road to provide a safer crossing between the two bus stops and an e-scooter and e-bike on-street bay on Sharratt Street in order to mitigate the increase in trips generated by the development and promote the use of public transport. This would be delivered as part of the S278 works.

377. These enhancements to the existing highways network adjacent to the site are strongly supported. They will make for a safer and more accessible public realm, and one that is more attractive to those considering travelling on foot or by bike.

Active Travel Audits

378. The 'Active travel' agenda, which is promoted at all levels of policy, seeks to make walking, wheeling and cycling the preferred choice for everyone. Upon the request from TfL, the applicant carried out two Active Travel Audits (ATAs), one for the day-time and one for the night-time. The purpose of the ATAs is to identify deficiencies in the existing local transport and public realm network, and make recommendations as to how these could be improved.
379. Turning firstly to the day-time ATA, this identified the opportunities for the following interventions to reduce barriers to active travel:
- provision of pedestrian seating near Currey Canal Road Gardens, New Cross Station and New Cross Gate Station;
 - provision of signage to encourage routing via quieter or alternative routes;
 - resurfacing the dropped kerb tactile paving crossings;
380. With regard to the night-time ATA, this identified a number of ways the local environment could be improved to make active travel more appealing, safe and convenient. Examples include:
- encouraging active frontages and signage along residential streets;
 - cleaning up the graffiti underneath the rail track on Surrey Canal Road to foster an increased sense of safety for those walking;
381. It is considered that other future major planning application proposals nearer to the locations in question could credibly deliver this remediation as part of their Healthy Streets contribution. In a similar way, all of the issues identified by the night-time ATA are a good distance away from the site, and could realistically be funded by other forthcoming developments closer to the locations in question, or through publicly-funded works.
382. As mentioned in earlier parts of this report, the planning application will bring forward significant improvements to the local pedestrian environment and the 'sense of place' more generally. As such, these works alone represent an adequate contribution towards the Healthy Streets agenda. They will make for a safer, more comfortable and more convenient environment for pedestrians and cyclists. Therefore, in this particular instance, it is not considered necessary or proportionate to require the applicant to make contributions towards any of the off-site active travel enhancements identified in the two ATAs.

Conclusion on Healthy Streets

383. Some ways in which the proposal would support the ten Healthy Streets indicators are:

- it would make major enhancements to the public realm around the site including wider footway with 14 street trees and 22 cycle parking on Ilderton Road and Sharratt Street (providing a safe and pleasant active travel experience)
- it would be car-free save for wheelchair parking spaces, thus promoting walking, cycling and use of public transport;
- it has been designed to minimise air and noise pollution; and
- It would provide investment in sustainable transport facilities and services to commensurately mitigate the impact on existing infrastructure including the following:
 - £534,600 (index linked from 2019) for public transport improvement including bus services
 - £100,000 (index linked) for the improvement over the nearby bus stops

384. The Section 106 Agreement will include clauses requiring the applicant to enter into the Section 278 works including the following:

- New zebra crossing on Ilderton Road with raised table at the junction of Ilderton Road and Sharratt Street
- Provide an e-scooter and e-bike on-street bay on Sharratt Street to promote sustainable travel.
- Provide 12 visitor cycle stands on Sharratt Street and 10 visitor cycle stands on Ilderton Road
- Provide 14 trees along Sharratt Street and associated maintenance costs
- Repave the footways
- Improve pedestrian crossings in the vicinity of the development, including any raised crossings and raised junctions if required. The applicant should design them in accordance with the SSDM requirements.
- Promote all necessary Traffic Regulation Orders (TMOs) to amend any parking controls and any amendments to existing waiting and loading restrictions.
- Refresh road markings following kerb installation.

385. With all of the Healthy Streets benefits secured through the appropriate mechanisms (planning conditions, Section 106 obligations and a package of sequenced Section 278 agreements), the proposal meets the requirements of London Plan Policy T2.

Trip generation

386. 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.

387. 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 PBSA bedspaces), index-linked to March 2019.
388. The submitted Transport Assessment estimates the total person two ways trips generated by each proposed uses during the AM and PM peak as follows:

<u>Trips generation</u>				
	PBSA including ancillary café and cycle hub	Self-storage	Fab-Lab	Total
AM (0800-0900)	72	23	25	123
PM (1700-1800)	72	24	28	126

389. Given the lack of on-site general needs for car parking along with the various public transport options in the area, nearby cycle links and on-site cycle parking provision, the trips associated with the proposed student accommodation would predominantly be by sustainable travel modes including on public transport, by bicycle and on foot with only 1 disabled parking space for the PBSA, 10 parking spaces would be provided for both the self-storage and Fab-Lab including 2 disabled parking and 2 vans spaces. Hence, it is estimated that the proposed development would generate 12 two-way vehicle trips in the AM peak and 9 two-way vehicle trips in the PM peak.
390. It is important to note that, compared to the existing site with its large areas of surface parking, the proposed development would result in a marginal reduction in private car trips, with 5 fewer two-way trips in the AM peak and 1 fewer two-way trips in the PM peak.
391. As there would be a public transport capacity impact from planning application 23/AP/1317, a contribution of **£534,600** (index linked from 2019) towards public transport improvement including local bus service

investment is to be secured for use by Transport for London. The applicant has agreed to this contribution.

392. It is considered the trip numbers generated by this planning application would not have any noticeable adverse impact on the local highway network when accounting for the bus service investment contribution, together with the other mitigation secured such as the initiatives 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.
393. 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

394. 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

395. The applicant's Transport Assessment, which uses TRICS data, predicts on a daily basis approximately 22 deliveries to the development, with the vast majority being in connection with the PBSA. Any vehicular servicing activity associated with the self-storage element of the development is considered to be included within the trip generation previously detailed as it is based on a site wide survey of a similar development. The split would be as follows
- PBSA: 17 deliveries
 - Fab-Lab : 5 deliveries
396. In respect of the PBSA premises (including the café), the Transport Assessment predicts that no more than 1 delivery would be during the peak hour (assumed as 08:00-09:00). It finds that these vehicles could be comfortably accommodated in succession by the servicing/maintenance bay located in the southern service yard. 1 delivery trip is predicted to occur during the peak hour (assumed as 17:00-18:00).
397. In respect to servicing and delivery vehicles attending the Fab Lab and self-storage, these would use the northern undercroft car park with a floor to ceiling height of 5.3m where two LGV loading bays would be provided which would adequately accommodate the servicing needs.
398. The following initiatives are proposed in the Outline Servicing and Delivery Plan:

- on-site management team will manage servicing activity in relation to the PBSA, 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 PBSA management team 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).

399. As noted above, the site is located within Phase 2, as per the requested from TfL, a Revised Delivery and Servicing Plan (DSP) will be submitted to the Council for further approval taking into account the delivery and servicing demand based on the latest data. Any additional measures will be adopted through the Revised Delivery and Servicing Plan and the associated monitoring mechanisms over the course of the first two years of operation, including a Delivery and Servicing Bond.

Servicing/delivery routing

400. The tracking analysis has been provided to demonstrate that the loading areas for both the PBSA and the commercial uses would accommodate LGVs to turn around within the development site enabling them to egress back on to Ilderton Road and Sharratt Street in forward gear.

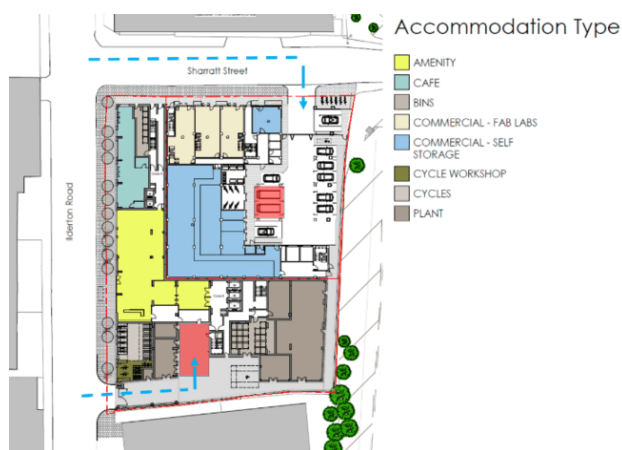


Image 36 (above): Routing strategy for servicing the proposed development with the servicing facilities highlighted in red and the routes in blue

401. Upon the request from Transport Policy Officer, the applicant has reconfigured the layout and demonstrated satisfactorily that two vans can ingress and egress the southern service yard in forward gear whilst there are a vehicle parked within the disabled parking bay and another LGV parked within this area for servicing activities which can take a whole day or longer.

Servicing/delivery hours

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

- 07:00 to 20:00 Monday to Saturday; and
- 10:00 to 18:00 on Sundays and Bank Holidays.

Conclusion on servicing/deliveries

403. The Transport Policy Officer confirmed that the proposed delivery and servicing arrangements are considered acceptable, and would have no negative impact on the local highways network or pedestrian safety subject to a Final Delivery and Servicing Plan based on the principles established by the Outline Delivery and Servicing Plan submitted with the application.

PBSA move-ins and move-outs

404. Students moving in and out of PBSA can generate a significant demand for loading space nearby. To ensure these impacts are minimised, the procedure for managing student arrival and departure periods at the start and end of term will be set out within the Final Student Management Plan to be secured by obligation, and this will be expected to align with the principles in the application-stage documents. The key elements proposed at this stage are:

- the southern servicing and maintenance area provided on-site will be for use by drop-off/pick-up activity;
- through an electronic booking system, students will be given a dedicated time slot (times would be distributed to avoid peak periods) in which they are able to make use of the service and maintenance bay to move their items;
- the move-in/out process may (if necessary, depending on numbers of move-ins) be spread across multiple days as necessary to ensure each student who requires it is provided with a time slot.

405. Specifically with regard to move-ins, but not move-outs, these further measures are proposed:

- an increased management presence will be provided to manage activity;
- in advance of their move-in date, students will be sent a supporting information pack relating to the vehicle move-in strategy, as well as information on public transport routes available to non-car arrivals.

406. In respect of move-out arrangements, student term end dates are variable depending on their respective courses, and as such, the process is less intensive – hence why only three of the five commitments above would apply to move-outs.

407. These measures are considered acceptable. With the final version of the Student Management Plan secured prior to occupation, no harm would be caused to the local highway network or surrounding residential amenity.

Refuse storage arrangements

408. With regard to the PBSA, waste would be collected by a private contractor, from bin stores sufficiently close to the servicing area of the PBSA building and the undercroft car park within the commercial building. Tracking has been provided to demonstrate sufficient turning space for refuse vehicles. Plans submitted with the application demonstrate that the refuse store has been sized to accommodate the refuse receptacles necessary to meet the volumes of waste generated by the PBSA, with sufficient manoeuvring and circulation space factored-in.
409. Through an obligation in the S106 Agreement, the developer is obliged to ensure that a contract is in place with a commercial provider of refuse/recycling collection services for both the PBSA and commercial uses for the lifetime of the development. The operators will be expected to keep refuse within the demise of the property and collect the refuse within the southern service yard and the undercroft car park.
410. The Final DSP, to be required by condition, will secure the finalised refuse details including the collection arrangements.

Car parking

411. 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.
412. 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

PBSA

413. Applying the London Plan standards, a total of 6 wheelchair accessible parking spaces (i.e. 3% of one third of 592 student beds) should be provided on-site from first occupation of the proposed development.
414. 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 10 (applying a 1:3 ratio to the PBSA 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.

415. 1 space will be provided for the PBSA as students with mobility impairments will be prioritised by their educational institution to accommodation closest to their teaching campus. Given the site's location close to numerous and regular bus routes and Queen's Road Station, as well as its predicted future PTAL rating, residents would benefit from a range of public transport options. On balance, the number of car parking spaces provided is acceptable.

416. *Self storage and Fab Labs*

A total of two disabled parking will be provided including 1 space beside the entrance gate to the undercroft car park and another one within the secured undercroft car park. The provision would be accessible and sufficient, complying with the policies.

417. Electric Vehicle Charging Points (EVCPs) are required to meet the London Plan standards, which as of 2023 are 20% active and 80% passive provision, considering all parking spaces, and should be maintained in perpetuity.

418. This means that the isolated disabled parking bay for the PBSA must have an active EVCP upon occupation; whilst the operational parking for the commercial component of the scheme must also have at least 20% active charging points upon occupation of the self storage and light industrial units. Active charging points are to be prioritised to disabled parking spaces. The details of the EVCP provision will be secured through condition. The blue badge car parking provision will be retained perpetually which would be secured by a Section 106 Agreement.

Reducing car usage

419. During the application stage, officers have asked the applicant to explore the provision of the Car Club Bay within the application site. The applicant has approached Zipcar who confirmed that student schemes did not lend themselves to car club provision as their terms restrict users to people of 23 years and older making it unviable. To reduce car usage, the applicant has agreed to offer free Car Club membership to first commercial operators of the commercial units within the development to a nearby (within 800meters) Car Club vehicle provider (minimum duration of the membership is to be 1 year) within three months of the first occupation of each commercial units. This will be delivered through an obligation in the S106 Agreement.

420. The site is not yet within a Control Parking Zone (CPZ) but will be inside Southwark's Old Kent Road CPZ Extension.
421. Through an obligation in the Section 106 Agreement, all residents of the proposed development would be exempted from applying for parking permits.

Cycle parking

422. 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.
423. The table below summarises the minimum cycle parking required by the Southwark Plan and London Plan, alongside the provision proposed by this application based on the submitted drawings. 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

<u>Land use</u>	<u>Long-stay spaces</u>			<u>Short-stay spaces</u>		
	Requirement		Provis ion	Requirement		Prov ision
	SP '22	LP '21		SP '22	LP '21	
PBSA including ancillary café and cycle workshop	592	444	593	59	15	68
Self storage (Use class B(8))	14	14	12	14	7	14
Fab-Labs (Class E(g)(iii))	4	2		4	1	
Total	610	460	605	77	23	82

PPSA long-stay cycle parking

424. As the table above shows, the proposal for the PBSA would exceed the minimum Southwark Plan requirement by 1 space which is supported.
425. With regard specifically to the PBSA, in total 593 secure long stay cycle parking spaces would be provided – these would be located above ground floor level, but accessible by lift in this mix of formats:
- 222 two-tier Josta Stands [444 spaces] (75% of the total);
 - 60 standard Sheffield Stands [119 spaces] (20% of the total); and

- 30 Sheffield Stands for use by accessible/larger cycles [30 spaces] (5% of the total).
426. During the application stage, detailed layouts have been provided of all the cycle stores as per officers' requests, showing general 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.
427. In an effort to further promote the cycling, a Cycle Workshop will be provided within the PBSA block with a direct entrance off Ilderton Road. The applicant is committed to find an operator to provide bike repair services. The proposed Cycle Workshop is beyond the minimum policy requirement and considered as additional public benefit. The Section 106 Agreement will ensure marketing strategy of the Cycle Workshop to be submitted and the Cycle Workshop will be delivered no later than 75% occupation of student accommodation within the host building. It will also ensure the Cycle Workshop will be accessible to the public.

Commercial long-stay cycle parking

428. With regard specifically to the commercial uses, a total of 12 secure long stay cycle parking spaces would be provided, all in Sheffield Stand format.
429. It is noted that as shown from the table above, the proposal for the non-residential uses would fall short of the Southwark Plan and London Plan requirements by 4 spaces and 2 spaces respectively. However, the calculation of the requirement for the proposed self-storage is based on the typical Storage and Distribution (class B(8) uses). However, the applicant estimates that the self-storage would employ 3-4 staff only, which would reduce the needs of long-stay cycle parking. It is therefore considered that the long stay cycle provision for the non-residential uses would be acceptable on balance.
430. As the Fab Lab units proposed by this application would take the form of a number of small-scale units and the proposed self storage will employ limited staff, the non-provision of dedicated showers for employees is acceptable in this instance.

Short-stay cycle parking

431. With regard to the proposed short-stay (visitor) provision, 82 spaces will be provided in this mix of formats:
- 20 two-tier Josta Stands [40 spaces] within the building;
 - 6 standard Sheffield Stands [10 spaces] within the building;
 - 1 cargo bike Sheffield Stands [2 spaces] within the undercroft car park
 - 5 Sheffield Stands [10 spaces] on Ilderton Road
 - 6 Sheffield Stands [12 spaces] on Sharratt Street

432. The on-street stands would be distributed across the public realm with adjacent to the various main entrances of the buildings. These are appropriate locations, as they would ensure the effective footway widths along the site's main frontages are kept clear of cycle storage.
433. The applicant has committed to provide a cargo bike loan scheme to the users of the commercial building in order to promote sustainable freight which is supported. This will be secured through a S106 Agreement.
434. The short-stay provision would fall slightly short of the Southwark Plan requirement (shortfall being 5 spaces) and significantly exceed the minimum London Plan requirement (the surplus being 49 spaces).
435. 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 the compliance with the London Plan requirements and having regard to the applicant's offer to contribute towards investment locally in TfL (Santander) docking stations, in this particular instance the shortfall in short-stay bicycle parking provision is considered permissible.

Improving access to cycle hire options

436. Given that the development would introduce up to 25 additional FTE employees to the site and 592 students upon full occupation, the applicant has agreed to contribute **£18,789** (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

437. The applicant has agreed, at the request of TfL, to make a contribution of **£30,000** (index linked) towards providing new and refreshed Legible London signage. This will be secured in the Section 106 Agreement.

Level changes across the ground plane

438. The proposed development would improve the public realm along the frontage of the site on Ilderton Road and Sharratt Street, including widening the footways, and providing street trees. As part of these public realm enhancement works, there is likely to be a degree of regrading of some of the existing footway to achieve the requisite cross-fall. This is standard practice and will be agreed through the Section 278 process, which occurs subsequent to planning permission being granted. The planning application proposes no changes to the existing road carriageway or kerb levels. The Transport Policy and Highways officers have reviewed the Ground Plane Spot Levels Plan and confirmed no objection.

Transport and highways summary

439. Having considered all transport and traffic related implications, 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

440. 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.
441. 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 **£7,920** 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

442. The site is in Flood Zone 3 and is located within an area benefitting from flood defences. The site was assessed as part of the Council's Strategic Flood Risk Assessment (2017) and sequential test. No further sequential test is required. 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.
443. In terms of flood resilience and safety, the Council's Flood Risk Management Team has assessed the applicant's revised 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; and
 - finished floor levels can be designed to produce a nominal threshold above surrounding ground levels, with the external levels designed so any surface flows shed away from buildings and towards positively drained areas.
444. Compliance with the Flood Risk Assessment will be secured by way of a condition, and a pre-occupation condition will be imposed requiring submission of a Flood Warning and Evacuation Plan.

Sustainable urban drainage

445. The applicant's Drainage Strategy proposes that surface water flows would be attenuated through the use of a blue/green roof system, and permeable paving complemented by below-ground geo-cellular storage crates. The discharge rates are proposed to be restricted to a rate equivalent to greenfield runoff. 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.
446. 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 (index linked) per cubic meter.

Land contamination

447. 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 further remediation measures to apply if contamination is found to be present.

Utilities

448. The submitted Utilities Strategy sets out the existing utilities on site (electricity, potable water, waste water and gas), and assesses the potential impacts of the proposed development on the wider networks, including the potential provision of additional services that may be required to deliver the proposals.
449. The applicant has made a submission to UKPN with an estimated total site load of 1.53MVA kVA and 225 kVA to carry out a developmental impact assessment for the proposed PBSA and commercial uses respectively. It is proposed to erect a new 1.6 MVA substation within the ground floor of the PBSA block. The exact location of the connections required are to be confirmed by UKPN and relevant parties in due course. UKPN has not responded to a consultation request from the Southwark Council about the planning application, and as such no objections are assumed with regards to the impact the proposal will have on the power supply network.
450. The proposed development is located within 15 metres of a strategic sewer and a strategic water main. A condition is recommended to secure a piling method statement as per Thames Water's request.
451. Thames Water have identified that some capacity exists within the water network to serve 100 dwellings and upgrades to the water network will be required beyond that. Works are ongoing to understand this in more detail and as such Thames Water recommended a planning condition to be attached to

any approval to ensure development does not outpace the delivery of essential infrastructure and acceptable pressure levels in the potable water supply and the local foul water infrastructure could be delivered. A condition is therefore recommended. Impacts on the local surface water infrastructure are dealt with in a separate part of this report entitled 'Sustainable urban drainage'.

452. There would be no impacts on the National Gas Transmission network as no gas will be used. A plant room for District Heat Network connection will be provided on the ground floor of the PBSA block. A S106 obligation will also require the commercial development to future proof any connection to District Heat Network (see also Energy and sustainability section).
453. For these reasons, it considered that the application meets the requirements of Southwark Plan Policies P64, P67 and P68.

Wind microclimate

454. 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.
455. The applicant's Wind Microclimate Report submitted in support of the application considers the following scenarios by using Computational Fluid Dynamic (CFD) modelling:
- Scenario 1 – proposed development in the 'Existing Surrounds, with Mitigation'
 - Scenario 2 – proposed development in the 'Future Surrounds, with Mitigation'
456. Wind conditions have been categorised using the Lawson Comfort Criteria and the predicated wind conditions compared against the intended uses.
457. The Wind Microclimate Report finds that, following the introduction of the proposed development with mitigation, wind conditions are predicted to meet the safety criteria within the site and nearby surrounding area, and are predicted to be suitable for existing and planned pedestrian uses. This applies on the entrances of all the surrounding buildings and the proposed development, main pedestrian routes and all existing amenity and parking spaces within a 250m radius of the site, as well as on the high-level communal outdoor spaces of the PBSA block. When the cumulative developments (plus the on-site mitigation) are factored-in, the conclusion remains that wind conditions would meet the safety criteria and be comfortable for the likely pedestrian uses taking place.

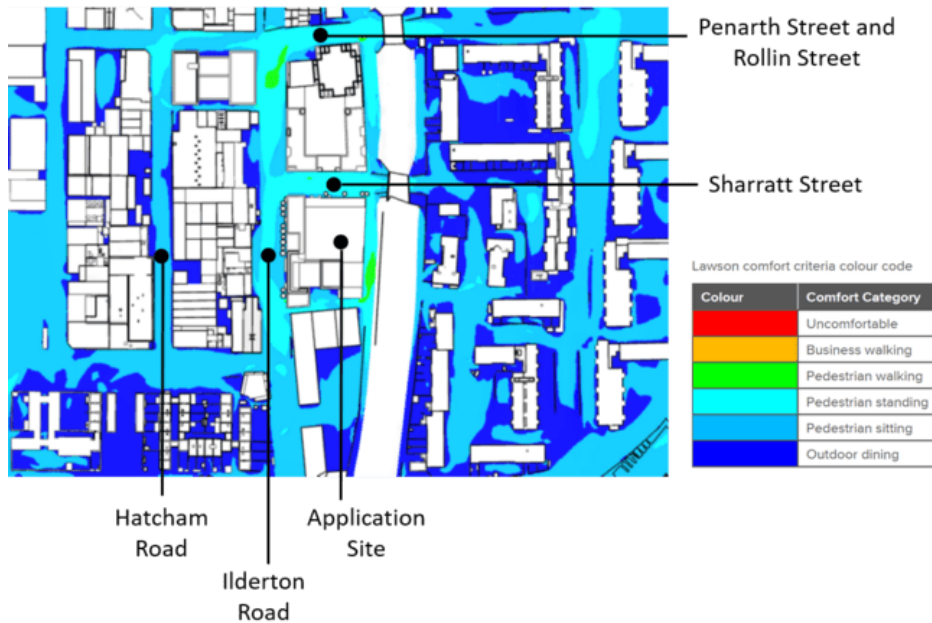


Image 37: Wind conditions at ground plane, in the proposed development, with mitigation, within existing surrounds

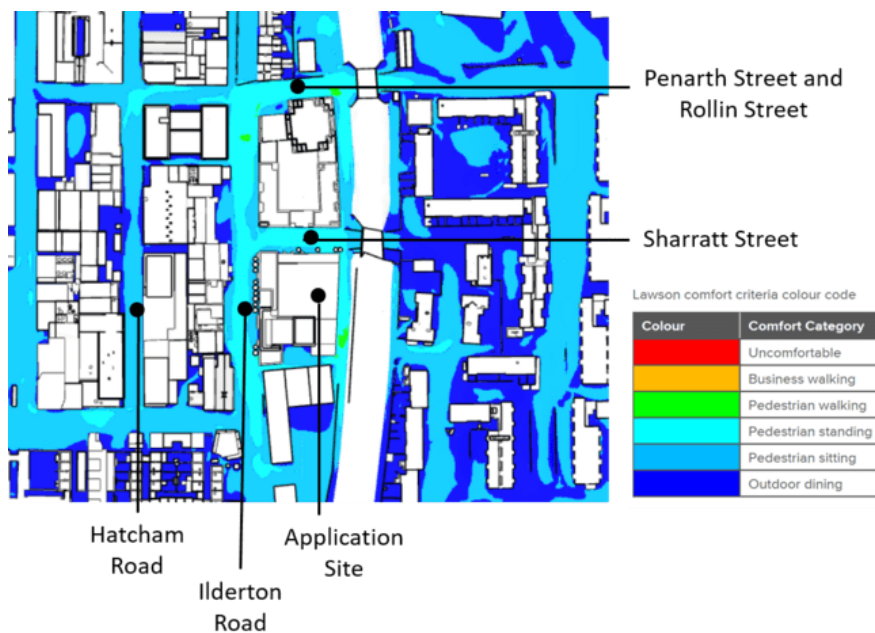


Image 38: Pedestrian wind conditions at ground plane in the proposed development, with mitigation, within cumulative surrounds

458. All necessary wind and microclimate mitigation measures including canopies to entrances to mitigate the wind downwash and solid parapet wall around the roof terrace (the details to be secured through conditions) have been incorporated to bring the wind conditions surrounding the proposed development to levels that are comfortable for the anticipated types of pedestrian activity. Therefore, it is considered that London Plan Policy D9 and Southwark Plan Policies P14, P17 and P56 have been met.

Air quality

459. 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.
460. In terms of the construction phase, fugitive dust was assessed as having a maximum dust risk of “high”; however, with the mitigation measures proposed, residual effects on receptors are likely to be negligible. These proposed measures, which are set out in the Outline Construction Environmental Management Plan, include locating machinery and dust causing activities away from sensitive receptors, using enclosed chutes and conveyors and covered skips, covering soil or debris mounds to prevent dust becoming airborne. The assessment of impacts from air pollution attributable to heavy goods vehicles during construction was also assessed quantitatively as “insignificant”. Mitigation in this regard includes ensuring all on-road vehicles comply with the London Low Emission Zone requirements. Both the fugitive dust and heavy good pollution would be temporary effects. Furthermore, following GLA stage I comments, the Applicant has included mitigation measures relating to monitoring within the construction dust risk assessment.
461. 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
462. Upon the request from GLA officers, the applicant has clarified that the net change of trips being generated from the proposed development is 75 AADT given the existing warehouse on site could have generated 56 Annual average daily traffic (AADT) and the proposed development is to generate 126 AADT. Therefore, the proposed development falls below the 100 AADT threshold outlined within the EPUK & IAQM 2017 guidance.
463. The Council's Environmental Protection officer has reviewed the Air Quality Assessment and confirms that subject to the proposed mitigation measures, the effects on air quality during construction and operation are considered to be negligible.

Agent of change

464. 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.
465. In the vicinity of the site, there are a range of existing businesses. These businesses currently coexist with nearby residential uses. 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.

466. For the reasons given above, the application complies with relevant NPPF, London Plan and Southwark Plan policies in respect of mitigating the impact of existing nuisances as the responsible 'agent of change'.

Light pollution

467. With respect to light pollution from internal sources, this typically is an issue where light is emitted from artificial sources, such as commercial offices, towards:
- residential accommodation (where this would cause a nuisance to occupants); or
 - natural environments where the existing level of external lighting is limited.
468. Given the urban environment, surrounding buildings and street lighting, the proposed development is unlikely to result in a significant change to the existing lighting levels. Furthermore, the façade detailing will break up the night-time illumination. The operational hours of the commercial development will be restricted through condition. Accordingly, it can be concluded that no undue effects would result from the occupation of the proposed residential uses, nor the commercial uses given that these are all contained at ground floor level.
469. With respect to light pollution from externally-affixed 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. 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

470. 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.
471. A Fire Strategy was submitted with the application. The Fire Strategy includes a Planning Gateway One form, a requirement of the HSE for all referable planning application submissions. Among other things, the Fire Strategy confirms that:

- Both buildings would be served by at least two stairs for means of escape and fire service operations, and at least one fire-fighting shaft;
- Additional firefighting lift provided to core B of the PBSA block (totalling 2 firefighting and 1 evacuation lift), serving all floors above ground;
- enhanced cavity barriers and fire stopping to be provided within the external walls, to further prohibit unseen smoke and fire spread via the external wall cavity;
- the main distribution risers are to be provided with additional horizontal fire stopping, every 4 floors, to reduce the risk of a fire spreading more than 12-16m vertically via the distribution risers;
- increased fire separation (vertically) between the PBSA block and commercial block with separating wall between the two buildings achieving 240 minutes fire resistance in terms of loadbearing capacity, integrity, and insulation;
- sprinklers system will be provided;
- for the PBSA building, the 'means of escape' would be a 'stay-put' means of escape strategy would apply;
- for the commercial building, the 'means of escape' would be a 'simultaneous evacuation' would apply (i.e. upon detection activation all areas will evacuate immediately);
- appropriate active fire protection systems would be installed, including fire detection and alarm, emergency lighting and signage, smoke control systems in both blocks and sprinklers in all the units, common circulation areas and all ancillary accommodation that are up to 100m² in the PBSA block);
- in the case of an emergency, the evacuation lifts in both blocks would switch from their everyday use to becomes a tool only for the evacuation of persons with disabilities and is not considered a general escape route; and
- Building Regulations Approved Document B compliance would be achieved.

472. The Fire Strategy was produced by fire risk engineering consultancy Orion Fire. The contents of the document have been checked and approved by a certified fire risk engineer (a Member of the Institution of Fire Engineers (MIFireE)).

473. In response to the comments received from HSE, the applicant provided justification for the proposed length of the horizontal pipework between the dry riser inlet points and the point where pipe becomes vertical and clarified that all cluster apartments in Block A are provided with a protected cluster corridors that are accessed directly from the common residential lobby/corridor in accordance with BS 9991. The HSE subsequently has confirmed the fire strategy is satisfactory and any technical fire safety technical details will be assessed at the Gateway 2 and building control stages.

474. On account of the above, the relevant fire risk minimisation policies of the London Plan are deemed to have been satisfied, with due regard to the guidance within the Fire Safety London Plan Guidance 2022.

475. A condition is recommended to ensure the construction and in-use operation of the building are carried out in accordance with the Fire Strategy.

Energy and sustainability

476. 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. Residential development and non-residential development should achieve a 10% and 15% reduction in emissions through energy efficiency measures respectively. 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.
477. 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

478. In terms of meeting the ‘be lean’ tier of the hierarchy, a range of passive and active measures are proposed. These measures include:
- ensuring optimum for passive solar heat gain and daylight penetration whilst reducing excessive solar gains through building orientation, solar shading and a balanced proportion of solid wall to glazing;
 - specifying energy efficient fabric and air tightness of the building to enhance thermal performance;
 - installing high-efficiency LED lighting with automatic presence detection controls in circulation and amenity spaces, as well as daylight dimming to the amenity spaces and communal kitchen areas, and lighting controls to the student accommodation units via manual switches; and
 - Allowing natural ventilation using automated louvres and manually openable windows for the Fab Labs

479. These 'demand reduction' measures will achieve an 8% reduction in carbon emissions over Part L 2021 in respect of the PBSA which falls short of the 10% London Plan target. In respect of the non-residential uses, an 25% reduction would be achieved which substantially exceeds the 15% target. Overall, 10% carbon emissions reduction has been achieved through these 'demand reduction' measures, and the Energy Statement demonstrates that a fabric first approach has been adopted. This is evidenced by the space heating demand for both uses being substantially below the GLA Energy Guidance benchmarks as shown in the table below.

Space heating demand and EUI performance:				
Uses	Energy Usage Intensity (EUI) (kWh/m ² /year)	Space heating demand (kWh/m ² /year)	EUI value from Table 4 of the GLA Energy Assessment Guidance (kWh/m ² /year)	Space heating demand from Table 4 of the GLA Energy Assessment Guidance (kWh/m ² /year)
Non-domestic	55.38	5.47	55	15
PBSA	38.93	1.32	55	15

Be Clean

480. The site is located in a heat network priority area (HNPA) and is located close to the proposed future route of the South East London Combined Heat and Power (SELCHP). The applicant has engaged proactively with the SELCHP operator (Veolia) and confirmed that they are committed to district heating network connection to the PBSA prior to first occupation. A plant room will be provided and the indicative pipe route has been identified.
481. As the vast majority of the self-storage will be heated for frost protection only and the heating demand will be low, no immediate District Heat Network (DHN) connection is allowed for this part of the site. For the light industrial affordable workspace Fab Lab units, Variable Refrigerant Flow (VRF) system is proposed which is welcome from a carbon emission reductions perspective. However, the applicant expects the fit out of the VRF system to be carried out by the affordable workspace operator which is not supported given the costs burden on the operator. It is expected that the rent free period for the affordable workspace lease would need to reflect the fit-out costs. This matter would be further discussed with the applicant and the potential affordable workspace operator and secure the agreed arrangement in the final S106 Agreement.
482. Furthermore, a S106 obligation has been agreed with the applicant to secure a DHN Energy Strategy to demonstrate how the non-residential development will be designed and built so that all parts of it will be capable of connecting to any future DHN. This meets the requirements of Policy SI 3 of the London Plan.

483. National Calculation Methodology (NCM) and Part L require the carbon emission factor used for a notional building to be the same if the DHN is "existing". As a result, there is no change between the Be Lean and Be Clean stages as they are using the same notional system. However, if the DHN network was modelled as "new" then a higher notional DHN carbon emission factor of 0.233 is used for the baseline and Be Lean, meaning the Be Clean betterment would be 53%.

Be Green

484. With respect to the 'be green' tier of the hierarchy, the applicant has proposed the following technologies:
- Air Source Heat Pumps for active cooling and back up energy source to serve the PBSA; and
 - photovoltaic panels at roof level generating a total of 89.2kWp and annual energy yield of 90,245 kWh across the PBSA and commercial buildings.
485. These 'be green measures' would reduce carbon emissions by 14% for the residential uses and 184% for the non-residential. On a side-wide basis, this equates to a reduction of 39%. The applicant has demonstrated that opportunities for renewable energy by producing, storing and using renewable energy on-site have been maximised.

486. Be Seen

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.

487. 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.

488. Total energy savings

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.

489. The proposal would reduce on-site regulated carbon dioxide emissions by 39% over a notional building minimally compliant with the Building Regulations 2021, which meets the London Plan 35% minimum target. The performance is summarised in the below table:

490. **CO2 emissions from each stage of the Energy Hierarchy: Summary table**

	Total Regulated Emissions	CO2 Savings	Percentage saving
Part L 2021 Baseline	32.8 tonnes CO2		
With Be Lean applied	29.5 tonnes CO2	3.3 tonnes CO2	10%
With Be Clean applied	29.5 tonnes CO2	0	0
With Be Green applied	20.2 tonnes CO2	9.3 tonnes CO2	28%
Cumulative saving		12.6 tonnes CO2	<u>39%</u>
Shortfall on carbon zero	20.2 tonnes CO2		

491. Whilst the carbon emissions reduction performance measured in percentage over the baseline may not appear as high as other schemes, as mentioned in earlier in the 'Be-Clean' section of this report, it is mainly because connection to an 'Existing' DHN results in a lower the baseline scenario. If DHN is considered as 'New', the overall carbon emissions reduction will be 81%. Immediate connection to DHN to serve the proposed PBSA is a result of detailed discussion between GLA and Southwark officers and the applicant and is strongly supported. Any further technical adjustments to the Energy Strategy will be dealt with under GLA Stage II referral.

492. 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 **£57,462**. 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.

493. Whole life cycle and carbon capture

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.

494. '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.
495. '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.
496. 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.
497. 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:
- 650 kgCO₂e/m² for Modules A1-A5 (covering the product sourcing and construction stages); and
 - 468 KgCO₂e/m² for modules B to C (covering the in-use and end-of-life stages), excluding operational energy and water.
498. 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 meets the GLA benchmark for Modules A1-A5 but falls short of the benchmark for Modules B-C (excluding B6 and B7). The WLC Assessment also identifies the following measures to be considered at the next stage of the design of the development:
- Concrete with 50% GGBS to all elements apart from core walls with 20% GGBS
 - Low carbon rebar (0.33 kg CO₂e/kg)
 - Timber/ aluminium windows.
- If these measures are implemented, approximately further 9% upfront carbon reduction will be achieved resulting a decrease of carbon from 651 kg CO₂e/m² to 595 kg CO₂e/m². Any further technical adjustments to the Energy Strategy will be dealt with under GLA Stage II referral.
499. A condition to require whole life-cycle carbon assessment in the completion stages is proposed.

Circular Economy

500. 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.
501. A detailed Circular Economy Statement was submitted with the application, which sets out strategic approaches, specific commitments and the overall implementation approach.
502. 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:
- using 20% Ground Granulated Blast-furnace Slag (GGBS) in concrete; use of rebar with 97% recycled content for substructure and superstructure;
 - using only FSC timber products;
 - minimising material use through prefabrication off-site for bathroom units;
 - Using higher recycled content - carpet tiles and metal doors
503. Specific targets committed to by the applicant include:
- diverting at least 95% of the waste from going into landfill;
 - 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); and
 - meeting an overall target of 20% reused or recycled content based on value of materials.
504. Circular Economy Reporting sheet estimates that 95 % of the total building material will be recycled. Any further technical adjustments to the Energy Strategy will be dealt with under GLA Stage II referral.
505. 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

506. 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.

507. 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).

508. The following paragraphs explain how the applicant has pursued this six-step process.

Minimise internal heat generation

509. In both the residential and non-residential elements of the development, internal heat generation is to be minimised through measures including efficient layout of communal pipework, with high levels of insulation for PBSA building and electric panel heaters and instantaneous hot water to eliminate heat gains from communal pipework for the commercial building.

Reduce heat entering the building

510. The heat entering the proposed development is to be reduced by a combination of measures. For the PBSA building, these include reasonable window to wall ratios provided with raised sill heights, low G-value glazing specified ($G=0.28$), recessed windows with ~200mm sills and reveals, and brise soleil features over the windows in the east and west parts of the façade, high levels of insulation specified and incorporation of green roofs. For the commercial building, these include north-facing orientation to glazing in occupied spaces, window to wall ratio reduced, and high levels of insulation specified.

Manage the heat within the building

511. Good floor-to-ceiling heights are proposed in both the residential and non-residential parts of the proposed development. Double layer of high-density plasterboard included to internal walls. Thermal contact with floor slabs via floating screed. The applicant's Overheating Assessment confirms that thermal mass has been factored into calculations and that this will help to offset temperatures when the building becomes cooler. Where possible in the Fab-Labs, exposed concrete will assist with thermal mass.

Use passive ventilation

512. With regard to the residential uses specifically, a number of passive ventilation measures are proposed. Openable windows are provided to all occupied spaces for the PBSA building. Mechanically actuated louvres are proposed for Fab Labs.
513. In a scenario where only passive measures (i.e. no mechanical or active measures) are incorporated into the residential parts of the development, in some instances there would be a failure to achieve 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).
514. Turning to the commercial uses, for which equipment and occupancy gains are two most common sources of overheating risk. Natural ventilation is proposed to the Fab Labs using a combination of manually openable windows to provide occupant thermal comfort and high-level actuated louvres that ensure comfortable conditions can be maintained when Fab Lab units are unoccupied.

Use mechanical ventilation

515. With regard to the PBSA building, mechanical ventilation with heat recovery (MVHR) and mechanical purge ventilation are provided to corridors, bedrooms, studios and communal kitchens of the PBSA. Regarding the commercial building, mechanical ventilation provided to reception and ancillary space.

Use active cooling systems (low carbon)

516. Due to the steps taken in accordance with the cooling hierarchy, as set out above, the need for cooling to avoid overheating risk throughout the year would be reduced across all the proposed uses. The applicant has minimised the areas required for active cooling to the amenity spaces of the PBSA and reception and ancillary spaces of commercial parts of the proposal. This active cooling would take the form of highly efficient Variable Refrigerant Flow system, utilising heat pumps.

Summary

517. Following the cooling hierarchy, the applicant has demonstrated that the building cooling demand has been kept as low as possible with minimal solar gains, in line with the criteria set out in CIBSE TM 52 and TM 59 guidance. With the proposed measures taken into account, the overall efficiency of the development would be enhanced. This is considered to be in compliance with London Plan Policy SI4 and Southwark Plan Policy P69.

BREEAM

518. Policy P69 of the Southwark Plan states that non-residential development must achieve a BREEAM rating of 'Excellent'. The applicant's BREEAM pre-assessment demonstrates that 'Excellent' (minimum 70%) can be achieved for all the proposed uses:

- 75.49% for student accommodation
- 80.89% for self-storage facility
- 76.98% for Fab Labs

A planning condition is recommended to secure this.

Water efficiency

519. The Sustainability Statement 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 fixtures and fittings including low flush toilets and low flow taps;
- water metering to encourage the monitoring and benchmarking of water consumption while the building is in operation.

Communications and aviation

Digital connectivity infrastructure

520. 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.

521. 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.

522. Although a Utilities Assessment accompanies the planning application, 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 District Town Centre location, it is very unlikely that delivering such digital infrastructure would prove difficult; therefore, 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

523. 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”.
524. Proposed buildings that are tall and/or broad, and in particular this proposal have the potential to reduce coverage of mobile phone networks. Arqiva has confirmed no objection. No harmful impacts are anticipated.

Aviation

525. 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.
526. No consultation response has been received from the Civil Aviation Authority or NATS in relation to this planning application. Given the height of this proposal relative to nearby tall building in Bermondsey Heights at 227-255 Ilderton Road and phase 2 of the Tustin Estate. It is reasonable to conclude that the proposed tall buildings would not cause any harmful aviation impacts.

Economic impacts

527. 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)

Direct on-site employment and training

528. In accordance with the policy framework, there would be a requirement for this development to deliver training and employment during the construction phase only. 16 construction industry apprentices, 63 short courses and 63 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.
529. Applying the metrics advised by the Homes and Communities Agency Employment Density Guide, the existing warehouse uses currently have the potential to employ a combined total of just over 20 people. However, the existing warehouse has been vacant.

530. The applicant suggests that the proposed self-storage facility will directly employ around 3-4 full time employees and the PBSA will employ at least 5 staff. The proposed Fab labs (which contain 825 NIA square metres of non-residential floorspace), would support up to 17 FTE positions, depending on the particular type of employment for which the units are ultimately used.
531. Overall, the proposed development would deliver up to 25 FTE positions, representing an uplift of up to 25 on the site's current employment given the premises are vacant now. It would satisfy the aims of the London Plan and the Southwark Plan in creating new jobs within the Opportunity Area.

Social and community integration

532. The strategic policies of the Southwark Plan, in particular Policies ST1 and SP2, expect new development proposals to foster mixed and integrated communities, noting that environments should seek to promote inclusivity and interaction to help achieve this.
533. It is noted that there is a concern that delivering a student housing led scheme of this size and density, which would only provide for one generation, is ill fitted to the location.
534. Due to their inherently transient nature, student populations can prove more challenging to integrate into their local community. Cognisant of this, and mindful of the possibility of students being introduced at the 313 Ilderton Road, the applicant has taken the feedback from the Community Review Panel, which aided in the design decisions to:
- integrate a café within the PBSA block to bring different groups together;
 - provide Fab Labs which would be affordable workspace with local community being given the priority for the tenancy;
 - provide a cycle workshop within the PBSA block to allow local community to use the bike repair service; and
 - provide 50 square metres free exhibition space within the development for local communities for 200 hours per year.

For these reasons, it is considered that the applicant has made adequate efforts to respond to the strategic objectives of the Southwark Plan and London Plan to integrate the 592 students with the future resident community as well as the wider existing residents. It is not considered on balance that the 592 student residents this scheme would introduce, when coupled with the other student homes schemes nearby, would give rise to an imbalanced, unintegrated or mono-cultural community.

Health impacts

535. The evidence base to the OKR APP includes a health impact assessment (forming part of a wider Integrated Impact Assessment), the conclusions of which are threaded through and underpin the content and policies of the draft AAP. As such, whilst a site-specific Health Impact Assessment (HIA) has not been

submitted, in accordance with the expectations of the draft AAP, the application would assist in tackling local health inequalities and delivering health outcomes. Some examples are given below:

- the design of the development should follow good practice such as the Secured by Design
- the proposal could, through its Community Infrastructure Levy liability, assist the Council to support and invest in relevant healthcare, educational and community bodies;
- optimising potential for training and employment opportunities by working in collaboration with the Council to develop a bespoke employment strategy.

536. As detailed in the earlier applicable parts of his report, the development would secure measures and mitigation to achieve all of the above. It is considered that due consideration has been given to equalities considerations, and having regard to the importance given to improved health outcomes by the NPPF, Policies GG3 and GG4 of the London Plan and Policy P45 of the Southwark Plan

Planning obligations

537. 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

In accordance with the Section 106 Planning Obligations and CIL SPD, a suite of contributions have been agreed with the applicant in order to mitigate the impacts of the development. These are listed in detail at Appendix 7 of this report. In summary, the financial contributions (which total £21,685,171) are:

- Affordable Housing Contribution: £20,700,000 (subject to BCIS All in Tender Price Index)
- Public Transport Contribution: £534,600 (BCIS index linked from 2019)
- Bus Stops Enhancement Contribution £100,000 (BCIS index linked)
- Legible London Signage Contribution: £30,000 (BCIS index linked)
- Cycle Hire Docking Station Contribution: £18,789 (BCIS index linked)
- Delivery and Servicing Monitoring Fee: £1,600 (RPI All Items index linked)
- Total Carbon Green Fund Contribution: £57,462 (RPI All Items index linked).
- Old Kent Road Public Open Space Contribution: £242,720.00 (BCIS index linked)

538. A number of contingent/default financial obligations will also apply. These will require a financial contribution in the event of a failure to deliver all or part of the following development benefits/mitigation:
- Total Carbon Green Fund Contribution: £57,462 (RPI All Items index linked).
 - Agreed greenfield run-off rates;
 - Agreed delivery and servicing baseline activity;
 - Agreed number of construction employment, training and apprenticeships; and
 - Agreed number of new trees.
539. Appendix 7 should be referred to for the full detailed set of the obligations sought to mitigate the development's impacts. Many of the obligations, although not a financial contribution per se, are extensive in nature. The appendix also include the applicant's current position in relation to each of these requested obligations.
540. In the event that a satisfactory legal agreement has not been entered into by 10th June 2025, 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 2023; 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

541. 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.

PBSA Borough CIL rates criteria

542. The site is located within Southwark CIL Zone 2 and MCIL2 Band 2 zone. Based on the floor areas provided by the agent's CIL Form 1 (dated 30 June 2023), the gross amount of CIL is approximately £4.95 million comprising £1.99 million of Mayoral CIL and £2.96 million of Southwark CIL.
543. It should be noted that as all 592 PBSA bedspaces are direct-let, the higher borough student CIL rate of £109 per square metre (plus 2024 indexation) has been applied for this CIL estimate.

544. It should be noted that this is an estimate, and the floor areas on approved drawings will be checked and the “in-use building” criteria will be further investigated, after planning approval has been obtained. CIL phasing details must be agreed with CIL team prior issue of planning decision notice

Community involvement and engagement

545. 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:

Consultation undertaken by applicant: Summary table	
<u>Date</u>	<u>Form of consultation</u>
Meetings (Pre-application phase)	
August 2022	<ul style="list-style-type: none"> • Meeting held with two of the three Old Kent Road ward councillors.
October 2022	Meeting held with: <ul style="list-style-type: none"> • Renewal (developers of New Bermondsey Quarter) • Vital OKR; • Barratt (Developers of Bermondsey Heights) • Winslade Estate TRA • Tustin Estate TRA • New Cross Gate ward councillors • Ilderton Primary School • Christ Apostolic Church Surrey Docks
November 2022	<ul style="list-style-type: none"> • Community Review Panel (round 1)
January 2024	<ul style="list-style-type: none"> • Community Review Panel (round 2)
Public Consultation Events (pre-application phase)	
October 2023	<ul style="list-style-type: none"> • Door knocking campaign; • Public exhibition on site • Website launch;

546. 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. The pre-application consultation undertaken by the applicant was an adequate effort to engage with those affected by the proposals.

547. 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.
548. 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. 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

Arqiva

549.
 - No objection
 - **Officer response:** Noted.

Environment Agency

550.
 - No objections/comments.
 - **Officer response:** Noted.

Greater London Authority

551. The detailed Stage 1 response from the Greater London Authority is published on, and can be read in full at, the Council's Public Access for Planning Register. Generally, the response was supportive of the development. Below is a summary of the matters raised with an officer response to each:

- Land use principles: The proposed intensification of the site to provide Purpose-Built Student Accommodation (Sui Generis) and an uplift in industrial floorspace (Class B8 and E(g) (iii)) is acceptable in principle subject to a Grampian obligation restricting development prior to a BLE construction contract being in place.

Officer response: *The applicant has agreed on the required Grampian obligation.*

- Student accommodation: the development proposes 615 student bedrooms with 35% on-site affordable student bedrooms, which is supported in principle in accordance with Policy H15. A nomination agreement should be secured via S106.

Officer response: *As discussed in the earlier part of this report, during the course of the application, upon the request from Southwark officers, the applicant has amended the affordable*

housing offer to make a financial contribution towards off-site conventional affordable housing delivery in the borough. The revised FVA was shared with the GLA officers. The applicant has then provided further evidence. The Council's viability assessor has confirmed that the applicant's affordable housing contribution is the maximum viable amount subject to early and late stage reviews which would be secured through the S106 Agreement.

- **Urban design:** The site is in an area suitable for tall buildings. The proposed development layout, scale and massing are generally supported. Further details regarding the articulation and overall appearance of the tower element of the proposal are required.

Officer response: *The applicant has amended the scheme to address the feedback and the GLA officers have been re-consulted on the revised scheme and confirmed that majority of the comments have been positively addressed.*

- **Transport:** Further information is required in relation to the ATZ assessment, disabled car parking, cycle parking, delivery and servicing, construction logistics, Student Management Plan, and the proposed Travel Plan.

Officer response: *The applicant has submitted an ATZ assessment and provided the justification of the disabled car parking provision. Cycle parking, the delivery and servicing plan, construction logistics and student management plan, Travel Plan have all been amended. Conditions are also recommended to ensure final details and compliance. Officers considered that the issues have been broadly addressed and any technical matters and S106 obligations can be resolved at the GLA Stage II referral.*

- **Sustainable development and environmental issues:** Further information is required on energy, whole-life cycle carbon, circular economy, biodiversity, green infrastructure, flood risk, sustainable drainage, and air quality.

Officer response: *These technical details have also been updated. GLA officers have been re-consulted. Officers considered that the issues have been broadly addressed and any technical matters can be resolved at the GLA Stage II referral.*

- Other issues on heritage, accessible development, strategic views also require resolution prior to the Mayor's decision making stage.

Officer response: *These issues have been assessed in the earlier part of the report. Any technical matters can be resolved at the GLA Stage II referral.*

Historic England

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

London Borough of Lewisham

553. • Did not wish to comment.

London Fire and Emergency Planning Authority

554. • Did not wish to comment.

Metropolitan Police

555. • 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

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

National Grid UK Transmission

557. • Did not wish to comment.

National Planning Casework Unit

558. • Did not wish to comment.

Natural England

559. • Did not wish to comment

Network Rail

560. • Did not wish to comment

Thames Water

561. • No objections subject to recommended conditions to secure piling method statement and all water network upgrades or agreement on development and Infrastructure Phasing Plan prior to occupation of 101th dwelling. Some informatives are also suggested.
 - **Officer response:** *The conditions are recommended.*

Transport for London (TfL) – Active Travel England

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

Transport for London (TfL) – Bakerloo Line Extension Safeguarding Unit

563. • No objection/comments, as the site lies just outside the Safeguarding Zone.
 - **Officer response:** Noted.

Transport for London (TfL) – London Underground / Docklands Light Railway Infrastructure Protection

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

Transport for London (TfL) – Spatial Planning

565. ‘TfL – Spatial Planning’ provided comments as part of the GLA Stage 1 referral process. These comments been provided under an earlier paragraph entitled “Greater London Authority”, and an officer response has been given to each matter raised.

UK Power Networks

566. • Did not wish to comment.

Community impact and equalities assessment

567. 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.
568. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.
569. The Council must not act in a way which is incompatible with rights contained within the European Convention of Human Right
570. Whilst a Equalities Impact Assessment has not been submitted, 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:
- Accommodation - accessibility: 10% of the PBSA 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.
 - 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, women, LGBTQIA+ people and transgender people. Cycle stores and entrances would be secure-accessed, well naturally surveilled and lobbied to prevent tail-gaiting, complemented by CCTV surveillance.
 - Religious groups: There is a church on the opposite of Ilderton Road. It is not considered that this development would prejudice the operation of the church in any way.
 - Transport: Wheelchair parking spaces and cargo bike spaces (the latter being capable of transporting disabled users) would also provided.
571. 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

572. 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.
573. This application has the legitimate aim of redeveloping the site for comprehensive development comprising large scale purpose built student accommodation units, affordable workspace, self storage, 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.

574.

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

575. This application would bring into productive and optimised re-use this underutilised site, providing a complementary mixture of students homes, light industrial units and self storage. These uses would be supported by high quality hard- and soft-landscaped new public realm. The proposal would also enable major new transport infrastructure upgrades, enhancing links with the surrounding areas by providing safe and accessible walking, cycling and public transport routes. This would on balance, subject to the payment of a PIL for affordable housing support the aspirations of the Old Kent Road Opportunity Area as set out in the adopted site allocation (NSP70) and the draft site allocation (OKR16).
576. Prior to the submission of the planning application, the applicant engaged in pre-application discussions with the Council, the Greater London Authority, Transport for London, the Health and Safety Executive and the Old Kent Road Community Review Panel, amongst other stakeholders. Extensive public consultation with local residents, including the relevant TRAs, has also been undertaken.
577. The design evolution of the proposed development is a reflection of the extensive pre-application process. The careful façade modelling and confident

crown designs are reflective of the buildings' quality along eastern side of Ilderton Road within the Opportunity Area where tall buildings are anticipated. The buildings would contribute positively to the local townscape. Through optimised active frontages and celebrated entrances, the development would provide an engaging and animated interface at street level.

578. There is support in the London Plan and Southwark Plan and draft OKR AAP for student housing, which contributes to the provision of affordable housing, and a mixed and inclusive neighbourhood. Given the context of development this scheme is coming forward in which includes a mix of conventional housing including affordable housing it is considered on balance to contribute to a mixed and inclusive neighbourhood. In a well-connected location with some HEIs a short bus ride away, the site is considered to be appropriate for student accommodation, meeting a demonstrable need and achieving compliance with the requirements of Southwark Plan Policy P5. Mindful of the importance of integrating the student population successfully with the existing and future local communities, the proposed development incorporates 1,030 square metre light industrial workspace (100% affordable workspace), 109.6 square metre publicly accessible café, 95.4 square metre cycle workshop and 50 square metre free exhibition space for local communities for 200 hours per year. The applicant developed the proposals working closely with the probable operator of the PBSA, who have considerable experience of managing student housing being the UK's largest independent provider.
579. The proposal would be a direct-let scheme and would not include any affordable student rooms. As no conventional affordable housing is proposed within the redevelopment, a payment-in-lieu is proposed of £20,700,000 (index-linked), which equates to 35% affordable housing by habitable room. The payment-in-lieu could potentially be used to directly support the delivery of affordable housing close to the application site. The payment-in-lieu is therefore considered to be a benefit of the application.
580. 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.
581. In terms of energy and sustainability, the proposals would meet the London Plan 35% target, achieving cumulative carbon savings of 39% against the Part L 2021 baseline. The proposals would meet the Mayor's Whole Life Cycle benchmarks. Alongside securing 350.07% biodiversity net gain, the proposal would achieve a UGF score of 0.4 – the latter achieved through features such as green and intensive roofs, connected tree pits and green walls. 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.
582. It is therefore recommended on balance that planning permission is granted, subject to:
- conditions as set out in the attached draft decision notice;

- referral to the GLA;
- the timely completion of a Section 106 Agreement;

BACKGROUND INFORMATION

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: 2168-761 Application file: 23/AP/1317 Southwark Local Development Framework and Development Plan Documents	Environmental, Neighbourhoods and Growth Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.g ov.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
Appendix 7	Section 106 heads of terms

AUDIT TRAIL

Lead Officer	Stephen Platts, Director of Planning and Growth	
Report Author	Pan Chong, Team Leader	
Version	Final	
Dated	29 November 2024	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director, Finance	No	No

Strategic Director, Environment, Neighbourhoods and Growth	No	No
Strategic Director, Housing	No	No
Date final report sent to Constitutional Team		29 November 2024

APPENDIX 1

Town and Country Planning Act 1990 (as amended)

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

RECOMMENDATION (DRAFT DECISION NOTICE)

LBS Reg. No.: 23/AP/1317

Date of Issue of Decision: N/A

Applicant Pheonix UK Prop Co Ltd

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

Demolition of the existing building and mixed use redevelopment of the site comprising Purpose-Built Student Housing including associated amenity and ancillary café and cycle workshop (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.

At: 257-283 Ilderton Road, London, Southwark, SE15 1NS

In accordance with the valid application received on 27 June 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. **APPROVED PLANS**

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 Condition:

2. **TIME LIMIT**

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

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

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

3. **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 and sewerage 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 and sewerage utility infrastructure, in accordance with: the National Planning Policy Framework 2023; and Policy SI5 (Water Infrastructure) of the London Plan 2021.

4. **DRAINAGE STRATEGY DETAILS**

No works (excluding demolition and site clearance) shall commence until full details of the proposed surface water drainage system incorporating Sustainable Drainage Systems (SuDS) have been submitted to and approved in writing by the Local Planning Authority, including detailed design, size and location of attenuation units and details of flow control measures. The strategy should achieve a reduction in surface water runoff rates during the 1% Annual Exceedance Probability (AEP) event plus climate change allowance, as detailed in the Drainage Strategy prepared by Will Rudd Davidson (Glasgow) Ltd (dated 15/05/2024). The applicant must demonstrate that the site is safe in the event of blockage/failure of the system, including consideration of exceedance flows. The site drainage must be constructed to the approved details.

Reason: To minimise the potential for the site to contribute to surface water flooding in accordance with the National Planning Policy Framework (2023); Policy SI 13 (Sustainable drainage) of the London Plan (2021); Southwark's Strategic Flood Risk Assessment (2017); Policy P68 (Reducing flood risk) of the Southwark Plan (2022).

5. **PRECAUTIONARY BAT SURVEY**

If more than one season passes between the most recent bat survey and the commencement of demolition and/or tree works, an updated bat survey must be undertaken immediately prior to demolition or tree works by a licensed bat worker. Evidence that the survey has been undertaken shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of demolition and/or tree works.

Reason: To ensure compliance with the Habitats Regulations and the Wildlife & Countryside Act (1981) (as amended).

6. **CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN**

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

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

- o Site perimeter continuous automated noise, dust and vibration monitoring;

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

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

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

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

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

To follow current best construction practice, including the following:

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

o Section 61 of Control of Pollution Act 1974;

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

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

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

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

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

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

o Relevant Stage emission standards to comply with Non-Road Mobile Machinery (Emission of Gaseous and Particulate Pollutants) Regulations 1999 as amended & NRMM London emission standards (<https://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); Policy P50 (Highway impacts), Policy P56 (Protection of amenity), Policy P62 (Reducing waste), Policy P64 (Contaminated land and hazardous substances), Policy P65 (Improving air quality) and Policy P66 (Reducing noise pollution and enhancing soundscapes) of the Southwark Plan (2022).

7. **JERSEY CUDWEED**

a) Prior to any demolition or construction works, which would impact on Jersey cudweed, a European Protected Species (EPS) licence shall be obtained from Natural England.

b) No demolition or construction works, which would impact on Jersey cudweed, shall be undertaken until the evidence of obtaining European Protected Species (EPS) licence has been submitted to and approved in writing by the Local Planning Authority.

Reason: To comply with the Wildlife & Countryside Act 1981 (as amended).

8. **CONSTRUCTION LOGISTICS PLAN**

No demolition or construction works shall begin until a Construction Logistics Plan to manage all freight vehicle movements to and from the site has been submitted to and approved by the Local Planning Authority in consultation with Transport for London.

The Construction Logistics Plan shall cover the following uses of the development:

- a) Purpose Built Student Accommodation
- b) Self Storage and light industrial units

The Construction Logistics Plan shall identify all efficiency and sustainability measures that will be taken during construction of this development including details of the measures to ensure the nearby bus stop will remain open and operational.

The development shall not be carried out otherwise than in accordance 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); T1 (Strategic approach to transport), Policy T4 (Assessing and mitigating transport impacts), Policy T7 (Deliveries, servicing and construction), Policy SI 1 (Improving air quality) of the London Plan (2021); Policy P56 (Protection of amenity) of the Southwark Plan (2022).

Further information and guidance is available at:
https://www.clocs.org.uk/resources/clp_guidance_clocs_final.pdf

Permission is subject to the following Grade Condition(s)

9. **SECTION DETAIL-DRAWINGS**

Prior to the commencement of any above grade works (excluding demolition and site clearance), section detail-drawings for each building at a scale of 1:5 together with 1:50 scale context drawings:

- i. Facades (reveals, soffits etc.) including:
 - The various bricks and paneled treatments;
 - Canopies/awnings;
 - Junctions of exposed structural elements (columns, beams and floors);
 - Head, cills and jambs of openings;
 - Parapets and roof edges;
 - Rooftop balustrades and crowns;
- ii. Entrances (including any access sashes, security gates, entrance portals and awnings);
- iii. Typical windows;
- iv. Plant screening/ enclosure;
- v. Commercial units and the Large-scale Purpose-built Student Accommodation foyers;
- 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.

10. **MATERIALS SCHEDULE AND ON-SITE PRESENTATION OF MOCK-UP PANELS**

Prior to the commencement of any above grade works (excluding demolition and site clearance):

- a) the specification of each facing materials to be used for each building hereby approved shall be submitted as part of a Material Schedule to, and approved in writing by, the Local Planning Authority; and

b) unless otherwise agreed in writing by the Local Planning Authority, full scale mock-ups of the facades shall be presented on site (or near to the site) for each building 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

11. 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, boundary treatments and seating and details of any planters and greening of plant enclosures) 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. Any trees or significant shrub that are 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.

Works shall comply to:

- 'BS: 4428 Code of practice for general landscaping operations';
- 'BS: 5837 (2012) Trees in relation to demolition, design and construction'; and
- 'BS 7370-4:1993 Grounds maintenance: Recommendations for maintenance of soft landscape (other than amenity turf)'.

REASON:

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, 11, 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), P60 (Biodiversity) and P61 (Trees) of the Southwark Plan 2022.

12. **BEE BRICKS / INVERTEBRATE HOTELS**

Details of Bee bricks and/or invertebrate hotels shall be submitted to and approved in writing by the Local Planning Authority prior to any superstructure works commencing on site.

No less than 2 Bee bricks and/or invertebrate hotels shall be provided and the details shall include the exact location, specification and design of the habitats. Bee bricks and/or invertebrate hotels shall be installed with the development prior to the first occupation of the building to which they form part or the first use of the space in which they are contained.

The Bee bricks and/or invertebrate hotels shall be installed strictly in accordance with the details so approved, shall be maintained as such thereafter.

Discharge of this condition will be granted on receiving the details of the invertebrate features and mapped locations and the Local Planning Authority agreeing the submitted plans, and once the invertebrate features are installed in full in accordance to the agreed plans.

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 G1 (Green Infrastructure), Policy G5 (Urban Greening), Policy G6 (Biodiversity and access to nature) of the London Plan (2021); Policy P59 (Green infrastructure) and Policy P60 (Biodiversity) of the Southwark Plan (2022).

13. **GREEN WALLS**

(a) Details of the green walls shall be submitted to and approved in writing by the Local Planning Authority prior to any superstructure works commencing on site.

The green wall can be either modular system or climbers rooted in soil. The wall 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.

(b) The green wall shall be carried out strictly in accordance with the details so approved and shall be maintained as such thereafter.

Reasons:

a) To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with policies: G1, G5, G6, and SI 13 of the London Plan 2021, Policy P59 and P60 of the Southwark Plan 2022.

b) To contribute to the Urban Greening Factor requirements of the London Plan 2021 and help attain a minimum score of 0.4 for residential developments and 0.3 for commercial developments.

14. **UNIVERSAL NESTING BRICKS (INTEGRAL SWIFT BRICKS)**

(a) Details of integral nesting bricks shall be submitted to and approved in writing by the Local Planning Authority prior to any superstructure works commencing on site.

No less than 10 Swift nesting bricks shall be provided and the details shall include the exact location, specification and design of the bricks. The bricks shall be installed within the development prior to the first occupation of the building to which they form part or the first use of the space in which they are contained.

(b) The Swift nesting bricks shall be installed strictly in accordance with the details so approved, shall be maintained as such thereafter.

(c) Discharge of this condition will be granted on receiving the details of the nest/roost features and mapped locations and Southwark Council agreeing the submitted plans, and once the nest/roost features are installed in full in accordance to the agreed plans.

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with policies: G6 of the London Plan 2011, Policy P59 and P60 of the Southwark Plan 2022.

15. **BAT ROOSTING FEATURES**

(a) Details of bat tubes, bricks or boxes shall be submitted to and approved in writing by the Local Planning Authority prior to any superstructure works commencing on site.

No less than 5 bat tubes, bricks or boxes shall be provided and the details shall include the exact location, specification and design of the habitats. The bat tubes, bricks or boxes shall be installed with the development prior to the first occupation of the building to which they form part or the first use of the space in which they are contained.

(b) The bat tubes, bricks or boxes shall be installed strictly in accordance with the details so approved, shall be maintained as such thereafter.

Discharge of this condition will be granted on receiving the details of the roost features and mapped locations and Southwark Council agreeing the submitted plans, and once the roost features are installed in full in accordance to the agreed plans.

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with policies: G6 of the London Plan 2021, Policy P59 and P60 of the Southwark Plan 2022.

16. **BIODIVERSE ROOF(S)**

Details of the biodiversity (green/brown) roof(s) shall be submitted to and approved in writing by the Local Planning Authority prior to any superstructure works commencing on site. The biodiversity (green/brown) roof(s) shall be:

1. Intensive green roof or vegetation over structure. Substrate minimum settled depth of 150mm Or, extensive green roof with substrate of minimum settled depth of 80mm (or 60mm beneath vegetation blanket) - meets the requirements of GRO Code 2014;
2. laid out in accordance with roof plans hereby approved; and.
3. planted/seeded with an agreed mix of species within the first planting season following the practical completion of the building works (focused on minimum 75% wildflower planting, and no more than a maximum of 25% sedum coverage).

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

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

Discharge of this condition will be granted on receiving the details of the green/brown roof(s) and Southwark Council agreeing the submitted plans, and once the green/brown roof(s) are completed in full in accordance to the agreed plans.

Reasons:

a) To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with policies: G1, G5, G6, and SI 13 of the London Plan 2021, Policy P59 and P60 of the Southwark Plan 2022.

b) To contribute to the Urban Greening Factor requirements of the London Plan 2021 and help attain a minimum score of 0.4 for residential developments and 0.3 for commercial developments.

17. **LANDSCAPE & ECOLOGICAL MANAGEMENT PLAN**

(a) Prior to the commencement of the development a landscape management plan, including long - term design objectives, management responsibilities and maintenance schedules for all landscaped areas (except privately owned domestic gardens), shall be submitted to and approved in writing by the local planning authority.

(b) The landscape management plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the local planning authority.

The scheme shall include the following elements: green roofs, green walls, soft landscaping, trees and ecological features.

Reason: To ensure the protection of wildlife and supporting habitat and secure opportunities for the enhancement of the nature conservation value of the site. This is a mandatory criteria of BREEAM (LE5) to monitor long term impact on biodiversity. Requirement is to produce a Landscape and Habitat Management Plan.

18. **SECURE BY DESIGN**

a) The development hereby permitted shall incorporate security measures to minimise the risk of crime and to meet the specific security needs of the development, in accordance with the principles and objectives of Secured by Design. Details of these measures shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of any above ground development and shall be implemented in accordance with the approved details prior to occupation.

b) Prior to first occupation of the development a satisfactory Secured by Design inspection must take place and the resulting Secured by Design certificate submitted to and approved in writing by the Local Planning Authority.

Reason: In pursuance of the Local Planning Authority's duty under Section 17 of the Crime and Disorder Act (1998) to consider crime and disorder implications in exercising its planning functions and to improve community safety and crime prevention, in accordance with the National Planning Policy Framework (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).

19. **DIGITAL CONNECTIVITY INFRASTRUCTURE STRATEGY**

Prior to commencement of any works (with the exception of demolition to ground level and archaeological investigations), 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 for the lifetime of the development.

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); Policy P44 of the Southwark Plan (2022).

20. **CAR PARKING DESIGN AND MANAGEMENT PLAN**

Before any above grade work hereby authorised begins for the relevant building, a Car Parking Design and Management Plan shall be submitted to and approved in writing by the Local Planning Authority for each building.

The Car Parking Design and Management Plan shall set out a strategy explaining:

- how the wheelchair accessible parking spaces are to be allocated on the basis of need (reflecting the fact that not every owner and/or occupier of a wheelchair dwelling may own a vehicle and not every disabled driver will require a wheelchair dwelling); and
- how, in the event that there is demand from the residential occupiers of the development, additional wheelchair accessible parking spaces to serve the wheelchair accessible residential units could be provided (including timeframe commitments for delivery such additional spaces).

All wheelchair accessible parking spaces on-site shall be safeguarded for future use by occupiers of the wheelchair accessible units.

REASON:

To ensure that there would be adequate provision for wheelchair accessible parking spaces, and that a strategy is in place to deliver more parking spaces in the event that there is occupier demand, in accordance with: the National Planning Policy Framework 2023; Policy T6.1 (Residential parking) of the London Plan 2021; and Policy P55 (Parking standards for disabled people and the physically impaired) of the Southwark Plan 2022.

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

21. **OFF-SITE POTABLE WATER INFRASTRUCTURE NETWORK CAPACITY UPGRADES**

Before the occupation of the 101st residential property, evidence to confirm that either:

- a) all water network upgrades, if required, to accommodate the additional potable water 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.

22. **WHOLE LIFE CARBON POST CONSTRUCTION MONITORING**

Prior to the occupation of each building the post-construction tab of the GLA's whole life carbon assessment template should be completed accurately and in its entirety in line with the GLA's Whole Life Carbon Assessment Guidance. The post-construction assessment should provide an update of the information submitted at planning submission stage, including the whole life carbon emission figures for all life-cycle modules based on the actual materials, products and systems used.

This should be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk, along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority, prior to occupation of the relevant building.

Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings in compliance with the National Planning Policy Framework (2023); Policy SI 2 (Minimising Greenhouse Gas Emissions) of the London Plan (2021) and Policy P70 (Energy) of the Southwark Plan (2022).

23. **FLOOD WARNING AND EVACUATION PLAN**

Before the first occupation of any part of the ground floor units hereby consented, a Flood Warning and Evacuation Plan shall be submitted to and approved in writing by the Local Planning Authority.

The Flood Warning and Evacuation Plan shall:

- state how occupants will be made aware that they can sign up to the Environment Agency Flood Warning services;
- state how occupants will be made aware of the plan itself;
- provide details of how occupants should respond in the event that they receive a flood warning, or become aware of a flood;
- state the measures that will be implemented to provide appropriate refuge, as well as safe and efficient evacuation for occupiers, in a flood event; and
- provide details of any flood mitigation and resilience measures designed into the scheme post-permission additional to those secured at planning application approval stage.

The approved Flood Warning and Evacuation Plan shall be implemented on first occupation of the ground floor premises hereby approved and carried out in accordance with the approved details for the lifetime of the development.

REASON:

To ensure that a strategy is in place that will reduce the risk to occupiers in the event of a flood, given that part of the site is at risk of surface water flooding, in accordance with: the National Planning Policy Framework 2023; Policy SI12 (Flood Risk Management) of the London Plan 2021; P68 (Reducing Flood Risk) of the Southwark Plan 2022; and Southwark's Strategic Flood Risk Assessment 2017.

24. **DRAINAGE VERIFICATION REPORT**

The development hereby approved shall not be occupied until a drainage verification report prepared by a suitably qualified engineer has been submitted to and approved in writing by the Local Planning Authority. The report shall provide evidence that the drainage system (incorporating SuDS) has been constructed according to the approved details and specifications as detailed in the Drainage Strategy Will Rudd Davidson (Glasgow) Ltd (dated 15/05/2024) and shall include plans, photographs and national grid references of key components of the drainage network such as surface water attenuation structures, flow control devices and outfalls. The report shall also include details of the responsible management company.

Reason: To ensure the surface water drainage complies with the National Planning Policy Framework (2023); Policy SI 13 (Sustainable drainage) of the London Plan (2021); Southwark's Strategic Flood Risk Assessment (2017) and Policy P68 (Reducing flood risk) of the Southwark Plan (2022).

25. **SIGNAGE STRATEGY**

Prior to occupation of the relevant building, a Signage Strategy detailing the design code(s) for the proposed frontages of the non-residential units at the base of Building 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 Signage Strategy design code(s) shall include details of:

- dimensions and locations of the advertisement zones;
- materials;
- awnings (if any);
- 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.

26. **FINAL EXTERNAL LIGHTING STRATEGY**

a) Before the first occupation of any part of the relevant building hereby consented, details of any external lighting (including: design; power and position of luminaries; light intensity contours; a 3D plan of the illumination level if required) of all affected external areas (including areas beyond the boundary of the development) shall be submitted to and approved by the Local Planning Authority in writing.

The lighting plans shall demonstrate compliance with the Institute of Lighting Professionals (ILE) Guidance Note 1 for the reduction of obtrusive light (2021). The lighting specification shall be LED's (at 3 lux) and the spectrum shall be 80% amber and 20% white with a clear view, no UV, horizontal light spread less than 70° and a timer. A 3D plan of the illumination level shall also be submitted to illustrate the potential impact on protected species.

(b) The development shall not be carried out otherwise than in accordance with any such approval given.

Reason: In order that the Council may be satisfied as to the details of the development in the interest of the visual amenity of the area, safety and security of the future users, protection of biodiversity including bats known to be active in vicinity of the development site. , the amenity and privacy of adjoining occupiers, and their protection from light nuisance, in accordance with the Wildlife & Countryside Act 1981, (as amended), National Planning Policy Framework (2023); Policy G6 (Biodiversity and access to nature) of the London Plan (2021) and Policy P56 (Protection of amenity) and Policy P60 (Biodiversity) of the Southwark Plan (2022).

27. **FINAL SECURITY SURVEILLANCE EQUIPMENT STRATEGY**

Before the first occupation of any part of the relevant building hereby consented, a Final Security Surveillance Equipment Strategy shall be submitted to and approved in writing by the Local Planning Authority for each building. 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.

28. **ELECTRIC VEHICLE CHARGING POINTS**

Before the first occupation of the building hereby approved, details of the installation (including location, type and commissioning certificate) of electric vehicle charger points for 11 parking space(s) shall be submitted to and approved in writing by the Local Planning Authority and the electric vehicle charger points shall be installed prior to occupation of the development and retained in perpetuity.

Reason: To encourage more sustainable travel in accordance with the National Planning Policy Framework (2023); Policy T6 (Car parking) of the London Plan 2021; Policy P53 (Cycling) and Policy P54 (Car Parking) of the Southwark Plan (2022).

29. **BLUE BADGE PARKING**

Before the first occupation of the development hereby approved, the Blue Badge parking arrangements (compliant to current Southwark design standards) as shown on the drawing: General Arrangement Ground Floor Plan (dwg ref: 3192-ACA-XX-00-DR-A-1110 Rev P8) hereby approved shall be provided and made available to the users of the development. Thereafter, such facilities shall be retained and maintained in perpetuity.

Each of the spaces shall be fitted with an electric vehicle charging point which shall be maintained in good working order thereafter.

Reason: To meet the requirements of Policy T6.1 (Residential Parking) of the London Plan (2021) and Policy P55 (Parking standards for disabled people and the physically impaired) of the Southwark Plan (2022).

30. **TRAVEL PLAN**

a) Before the first occupation of the building hereby permitted commences, the applicant shall submit in writing and obtain the written approval of the Local Planning Authority to a Travel Plan written in accordance with TfL best guidance at the time of submission, setting out the proposed measures to be taken to encourage the use of modes of transport other than the car by all users of the building, including staff and visitors.

b) At the start of the second year of operation of the approved Travel Plan, a detailed survey showing the methods of transport used by all those users of the building to and from the site and how this compares with the proposed measures and any additional measures to be taken to encourage the use of public transport, walking and cycling to the site shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise in accordance with any such approval given.

c) At the start of the fifth year of operation of the approved Travel Plan a detailed survey showing the methods of transport used by all those users of the building to and from the site and how this compares with the proposed measures and any additional measures to be taken to encourage the use of public transport, walking and cycling to the site shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise in accordance with any such approval given.

Reason: In order that the use of non-car based travel is encouraged in accordance with the National Planning Policy Framework (2023); Policy T6 (Car parking) of the London Plan (2021); Policy P54 (Car parking) of the Southwark Plan (2022).

31. **NOISE LEVEL REQUIREMENTS FOR THE RESIDENTIAL UNITS**

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

-
- Bedrooms: 35dB LAeq T#, 30 dB LAeq T*, 45dB LAFmax T *
 - Living rooms: 35dB LAeq T #
 - Dining room: 40 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.

Following completion of the development and before the first occupation of any part of the development, a Validation Test shall be carried out on a relevant sample of premises (10% of the dwellings, unless otherwise agreed with the Local Planning Authority), 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 2021; Policy D14 (Noise) of the London Plan 2022; and Policies P56 (Protection of Amenity) and P66 (Reducing Noise Pollution and Enhancing Soundscapes) of the Southwark Plan 2022.

32. **RESISTANCE TO VERTICAL SOUND TRANSMISSION BETWEEN COMMERCIAL AND RESIDENTIAL USES**

Party walls, floors and ceilings between the commercial premises and PBSA shall be designed to achieve a minimum weighted standardized level difference of 60dB DnTw+Ctr. Prior to first occupation of any part of the development, the following shall be submitted to and approved in writing by the Local Planning Authority:

- results of testing of the separating partition for airborne sound insulation in accordance with the methodology of ISO 16283-1:2014; and
- details of the specification of the partition together with full results of the sound transmission testing.

Once approved the partition(s) shall be permanently maintained thereafter.

REASON:

To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of noise nuisance and other excess noise from activities within the commercial premises in accordance with: the National Planning Policy Framework 2023; and Policies P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes) of the Southwark Plan 2022.

33. **BREEAM CERTIFICATION**

a) Before the first occupation of the non-residential uses 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 and PBSA elements of the development hereby approved will, once completed, achieve the agreed 'Excellent' BREEAM Standards.

b) Within six months of first occupation of the non-residential uses 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.

34. URBAN GREENING CERTIFICATION

a) Before the first occupation of any part of the development hereby consented, an interim report/letter (together with any supporting evidence) from a suitably qualified landscape specialist shall be submitted to and approved in writing by the Local Planning Authority. The report/letter shall confirm that sufficient progress has been made in terms of detailed design, procurement and construction to be reasonably well assured that the development hereby approved will, once completed, achieve the agreed UGF score of 0.4.

b) Within six months of first occupation of the final building hereby permitted, a post construction certificate prepared by a suitably qualified landscape specialist (or other verification process agreed with the Local Planning Authority) shall be submitted to and approved in writing by the Local Planning Authority, confirming that the agreed UGF score of 0.4 has been met.

REASON:

To ensure the proposal complies delivers the agreed UGF score, in accordance with: the National Planning Policy Framework 2023; Policy G5 (Urban Greening) of the London Plan 2021; and Policies SP6 (Climate Emergency), P13 (Design of Places), P59 (Green Infrastructure), P60 (Biodiversity) and P65 (Improving Air Quality) of the Southwark Plan 2022.

35. **BIODIVERSITY MITIGATION AND ENHANCEMENT MONITORING SCHEME**

a) Before the first occupation of any part of the relevant phase hereby consented, a 'Biodiversity Mitigation and Enhancement Monitoring Scheme' shall be submitted to and approved by the Local Planning Authority for each phase. The Scheme shall include (but not necessarily be limited to):

- i. Description and evaluation of the features to be monitored (including the following elements: green roofs, green walls, soft landscaping, trees and ecological features) ;
- ii. Conformity with the approved Ecological and Landscape Management Plan;
- iii. Conformity with the approved Biodiversity Net Gain targets;
- iii. Details of the monitoring needed to measure the effectiveness of management;
- iv. Details of the timetable for each element of the monitoring programme;
- v. Details of the persons responsible for the implementation and monitoring; and
- vi. Mechanisms of adaptive management to account for necessary changes in work schedule to achieve the required targets;

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 in accordance with the approved Scheme referred to in part a) of this condition. Surveys shall be undertaken in years 1, 3, 5, 7, 10, 15, 20, 25 and 30 after the first occupation of the development

c) A monitoring report shall be submitted to the Local Planning Authority within 3 months of each survey for approval in accordance with the approved Scheme for a period of 30 years. and the evidence submitted to the Council for discharge in those nine stages referred in part b) of this condition.

d) Species results shall also 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.

Permission is subject to the following Compliance Condition(s)

36. **REFUSE STORAGE COMPLIANCE**

The development hereby approved shall not be carried out other than in accordance with the refuse storage facilities (individual bin stores, routes to bin stores, bin collection locations, levels and gradients to and from the store, bulky waste storage) as shown on the drawings hereby approved.

Thereafter, such facilities shall be retained and maintained unless otherwise approved by the Local Planning Authority.

REASON:

To ensure that the refuse will be appropriately stored within the site (thereby protecting the amenity of the site and the area in general from litter, odour and potential vermin/pest nuisance) and that it can be collected efficiently by collection service providers, in accordance with: the National Planning Policy Framework 2023; Policies S17 (Reducing Waste and Supporting the Circular Economy) and T7 (Deliveries, Servicing and Construction) of the London Plan 2021; Policies P45 (Healthy Developments), P50 (Highways Impacts), P56 (Protection of Amenity) and P62 (Reducing Waste) of the Southwark Plan 2022; and the Council's Waste Management Strategy Extension 2022-2025.

37. **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) as shown on the drawings hereby approved.

Thereafter, such facilities shall be retained and maintained in perpetuity unless otherwise approved by the Local Planning Authority.

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.

38. **FIRE SAFETY STRATEGY COMPLIANCE**

The development hereby approved shall be carried out in accordance with the recommendations of the Planning Gateway One Fire Statement dated 28 April (ref: 2023OF-000799-FSS-01), London Plan Fire Statement dated 28th April (ref: 2023OF-000799-LFS-01), Fire Strategy Levels 03 to 05 (dwg no: 22004GA_D_013 Rev C), Fire Strategy - Site & GF to Level 2 floor plans (dwg no: 22004GA_D_012 Rev D) and Response to HSE comments dated 16 th January 2024 (ref: OF-000799-LET-01) unless a revised Fire Statement is submitted to and approved in writing by the Local Planning Authority prior to the relevant works being carried out.

Reason: To ensure that the development incorporates the necessary fire safety measures in accordance with Policy D12 (Fire safety) of the London Plan (2021).

39. **TREE PROTECTION MEASURES COMPLIANCE**

The existing trees on or adjoining the site which are to be retained shall be protected and both the site and trees managed in accordance with the recommendations (including facilitative pruning specifications and supervision schedule) contained in the Arboricultural Report dated August 2024.

All tree protection measures shall be installed, carried out and retained throughout the period of the works, unless otherwise agreed in writing by the Local Planning Authority. In any case, all works must adhere to BS5837: (2012) Trees in relation to demolition, design and construction and BS3998: (2010) Tree work recommendations.

If within the expiration of 5 years from the date of the occupation of the building for its permitted use any retained tree is removed, uprooted is destroyed or dies, another tree shall be planted at the same place and that tree shall be of such size and species, and shall be planted at such time, as may be specified in writing by the Local Planning Authority.

REASON: To avoid damage to the existing trees which represent an important visual amenity in the area, in accordance with: Chapters 8, 11, 12, 15 and 16 of the National Planning Policy Framework 2023; Policies G1 (Green Infrastructure), G5 (Urban Greening) and G7 (Trees and Woodlands) of the London Plan 2021; Policies G5 (Urban greening) and G7 (Trees and woodland) of the London Plan (2021); Policy P13 (Design of Places), Policy P56 (Protection of Amenity), Policy P57 (Open Space), Policy P60 (Biodiversity) and P61 (Trees) of the Southwark Plan 2022.

40. **BACKUP GENERATOR(S)**

The use of the backup generator(s) shall only be used for emergency use and operational testing. The backup generators shall not be used more than 50 hours per year unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure the proposal minimises its impact on air quality in accordance with the National Planning Policy Framework (2023); Policy P56 (Protection of amenity) and Policy P65 (Improving air quality) of the Southwark Plan (2022).

41. **COMMERCIAL KITCHEN EXTRACT VENTILATION MAINTENANCE**

All components of any commercial kitchen 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.

42. **CAR FREE MARKETING**

The materials/details used to market all of the for rental student homes 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 Policy P54 (Car Parking) of the Southwark Plan 2022.

43. **RESTRICTION: DELIVERY OF NON-RESIDENTIAL USES**

Prior to the first occupation of the purpose built student housing hereby permitted, the self-storage facility (Use Class B8) and light Industrial workspace / incubator units (Use Class E(g)(iii)) hereby permitted shall be completed in full.

Reason: To ensure the delivery of the light industrial uses in accordance with Policy E7 (Industrial intensification, co-location and substitution) of the London Plan (2021).

44. **HOURS OF OPERATION: CAFÉ**

The Café at Level 00 of PBSA Building for which consent is hereby granted for ancillary use to the wider PBSA (Use Class Sui Generis) use of the parent building, shall not be carried on outside of the following hours:

- 07:00hrs to 23:00hrs on Mondays to Saturdays; and
- 09:00hrs to 22:00hrs on Sundays (including Bank Holidays).

REASON:

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of night-time noise nuisance, in accordance with: the National Planning Policy Framework 2023; Policy D14 (Noise) of the London Plan 2021; P56 (Protection of Amenity) and P66 (Reducing Noise Pollution and Enhancing Soundscapes) of the Southwark Plan 2022.

45. **HOURS OF OPERATION: NON-RESIDENTIAL UNITS**

The self-storage facility (Use Class B8) and light Industrial workspace / incubator units (Use Class E(g)(iii)) hereby permitted shall not be carried on outside of the hours 07:00 to 23:00 on any day.

Reason:

To safeguard the amenity of neighbouring residential properties in accordance with the National Planning Policy Framework 2023; Policy D14 (Noise) of the London Plan 2021; P56 (Protection of Amenity) and P66 (Reducing Noise Pollution and Enhancing Soundscapes) of the Southwark Plan 2022.

46. **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 non-residential parts of the development hereby approved shall only be between the following hours, unless otherwise approved by the Local Planning Authority:

- 07:00 to 20:00 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.

47. **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 documents unless otherwise amended by other conditions in this decision notice:

- 'Ecological and Biodiversity Assessment ' - Version 2.0 - Dated March 2024 - Produced by Bakerwell
- 'Biodiversity Net Gain Letter Report' - Dated 02.02.24 - Produced by Bakerwell
- 'Biodiversity Metric 4.0 Calculation Tool' - Dated 02.02.24 - Produced by Bakerwell

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.

48. **RESTRICTION ON PERMITTED USES OF STORAGE AND DISTRIBUTION USES**

6,947 sqm of the Class B(8) floorspace hereby approved shall be used for use Class B(8) purposes only unless otherwise agreed by way of a formal application for planning permission.

Reason: In accordance with the application details and order to ensure that the site continues to provide employment floorspace which can accommodate storage/distribution uses in accordance with site allocation NSP70 and Policy P29 (Strategic protected industrial land) of the Southwark Plan (2022).

49. **RESTRICTION ON PERMITTED USES OF LIGHT INDUSTRIAL WORKSPACE / INCUBATOR UNITS**

Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 1987 and any associated provisions of the Town and Country Planning General Permitted Development Order (including any future amendment or enactment of those Orders) 1,030 sqm of the Class E(g)(iii) floorspace hereby approved shall be used for use Class E (g) (iii) purposes only unless otherwise agreed by way of a formal application for planning permission.

Reason: In accordance with the application details and order to ensure that the site continues to provide employment floorspace which can accommodate light industrial uses in accordance with site allocation NSP70 and Policy P29 (Strategic protected industrial land) of the Southwark Plan (2022).

50. **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.

51. **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.

52. **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.

Permission is subject to the following Special Condition(s)

53. PLANT NOISE DESK-BASED AND AS-BUILT ACOUSTIC REPORTING

a) 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'. Suitable acoustic treatments shall be used to ensure compliance with the above standard.

b) Prior to the plant being commissioned, a desk-based acoustic report validating the design's compliance with the standards described in part a) of this condition shall be submitted to the Local Planning Authority for approval in writing.

c) Within six months of first occupation of the development hereby approved, an as-built acoustic report providing the results of a validation test and demonstrating compliance with the standards described in part a) of this condition shall be submitted to and approved in writing by the Local Planning Authority.

Once the as-built acoustic report has been approved, the plant and any acoustic treatments shall be permanently maintained thereafter.

REASON:

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance, 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.

54. **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.

55. **EXTRACTION AND VENTILATION SCHEME FOR CAFE AND OTHER COMMERCIAL KITCHEN USES**

Before commencement of any non-residential use involving the cooking of food, full particulars and details of a scheme for the extraction and ventilation of all commercial kitchens (which shall be designed in accordance with the EMAQ Document "Control of Odour and Noise from Commercial Kitchen Exhaust Systems" dated 05-09-2018) shall be submitted to and approved by the Local Planning Authority in writing. The scheme shall include:

- Details of extraction rate and efflux velocity of extracted air
- Full details of grease, particle and odour abatement plant
- The location and orientation of the extraction ductwork and discharge terminal
- A management 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.

56. **SITE CONTAMINATION**

a) 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.

b) 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.

c) In the event that potential contamination is found at any time when carrying out the approved development that was not previously identified, it shall be reported in writing immediately to the Local Planning Authority, and a 'Scheme of Investigation and Risk Assessment', a 'Remediation and/or Mitigation Strategy' and (if required) a 'Verification Report' shall be submitted to the Local Planning Authority for approval in writing.

REASON:

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to

workers, neighbours and other off-site receptors, in accordance with: the National Planning Policy Framework 2021; and Policy P64 (Contaminated Land and Hazardous Substances) of the Southwark Plan 2022.

57. **SITE CONTAMINATION**

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

Reason: There is always the potential for unexpected contamination to be identified during development ground works. The Environment Agency and the Environmental Protection Team should be consulted should any contamination be identified, in accordance with the National Planning Policy Framework (2023); Policy P56 (Protection of amenity) and Policy P64 (Contaminated land and hazardous substances) of the Southwark Plan (2022).

Informatives

1. 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

2. 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

3. INFORMATIVE RELATING TO STREET DESIGN

The Highway Authority requires works to all existing and any proposed new streets and spaces (given for adoption or not) to be designed and constructed to adoptable standards. Southwark Council's published adoptable standards as Highway Authority are contained in the Southwark Streetscape Design Manual (SSDM)

4. INFORMATIVE RELATING TO DRAINAGE AND PUBLIC HIGHWAY

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

5. INFORMATIVE RELATING TO JOINT CONDITION SURVEY

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

6. INFORMATIVE RELATING TO BIRD NESTING SEASON

All areas of hedges, scrub or similar vegetation where birds may nest which are to be removed as part of the development, are to be cleared outside the bird-nesting season (March - August inclusive) or if clearance during the bird-nesting season cannot reasonably be avoided, a suitably qualified ecologist will check the areas to be removed immediately prior to clearance and advise whether nesting birds are present. If active nests are recorded, no vegetation clearance or other works that may disturb active nests shall proceed until all young have fledged the nest.

APPENDIX 2

Relevant planning policies

Reference:	23/AP/1317
Proposal:	Demolition of the existing building and mixed use redevelopment of the site comprising Purpose-Built Student Housing including associated amenity and ancillary café and cycle workshop (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.
Location:	257-283 Ilderton Road, London, Southwark, SE15 1NS

Adopted planning policy

National 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 4 - Decision-making
 - 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 H15 - Purpose-built student accommodation
 - Policy S1 - Developing London's social infrastructure
 - Policy S2 - Health and social care facilities
 - Policy S4 - Play and informal recreation
 - Policy E1 - Offices
 - Policy E2 - Providing suitable business space
 - Policy E3 - Affordable workspace
 - Policy E4 - Land for industry, logistics and services to support London's economic function

- Policy E6 - Locally Significant Industrial Sites
- Policy E7 - Industrial intensification, co-location and substitution
- Policy E8 - Sector growth opportunities and clusters
- 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 (2022)
- Mayor of London: Housing (SPG, 2016)
- Mayor of London: Housing Strategy (2018)
- Mayor of London: Characterisation and growth strategy (LPG,2023)
- Mayor of London: Optimising site capacity: a design-led approach (LPG,2023)
- Mayor of London: Housing design standards (LPG,2023)
- Mayor of London: Purpose-built Student Accommodation (LPG,2024)
- 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)
- Mayor of London: Urban greening factor (LPG,2023)

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: Affordable Housing (draft)
 - Mayor of London: Development Viability (draft)
 - Mayor of London: Fire safety (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 P5 - Student homes
- 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 P23 - Archaeology
- Policy P26 - Local list
- Policy P27 - Education places
- Policy P28 - Access to employment and training
- Policy P30 - Office and business development
- Policy P31 - Affordable workspace
- Policy P39 - Shop fronts
- Policy P43 - Outdoor advertisements and signage
- Policy P44 - Broadband and digital infrastructure
- Policy P45 - Healthy developments
- 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, 2024 consultation version)

APPENDIX 3

Planning history

Reference:	23/AP/1317
Proposal:	Demolition of the existing building and mixed use redevelopment of the site comprising Purpose-Built Student Housing including associated amenity and ancillary café and cycle workshop (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.
Location:	257-283 Ilderton Road, London, Southwark, SE15 1NS

<u>Application site</u>	
1.	<p>Reference Number: 24/AP/1640 Application Type: Prior Approval</p> <p>Prior approval for demolition of the existing White Lion Court storage building (Use Class B8)</p> <p>Decision: Pending</p>
2.	<p>Reference Number: 22/EQ/0063 Application Type: Pre-application Enquiry</p> <p>Pre-application enquiry for: self-storage facility (Use Class B8) and affordable workspace.</p> <p>Decision: Pre-application enquiry closed Decision date: 10 August 2022</p>
3.	<p>Reference Number: 23/AP/0737 Application Type: Screening Opinion</p> <p>Request for an Environmental Impact Assessment (EIA) Screening Opinion under Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended), for redevelopment comprising demolition of the existing buildings and redevelopment of the Site to deliver a 29-storey mixed use development comprising of both PBSA (Sui Generis) and new self-storage facilities (Use Class B8).</p> <p>Decision: EIA is not required Decision date: 17 April 2023</p>

Other nearby sites**4. 227-255 Ilderton Road London SE15 1NS**

Reference Number: 19/AP/1773

Application Type: Full Planning Permission

Demolition of existing buildings and the erection of a part 2/3, 9 and 28 storey (up to 94.65m AOD) mixed-use development comprising of 3,581 sqm including 2,538 sqm of industrial floorspace (Use Classes B1c/B8) at ground and intermediate levels, 598 sqm of internal loading yard, 445 sqm ancillary plant and equipment; and 253 residential apartments (C3), 35.75% affordable by habitable room, and other associated infrastructure. This application represents a departure from strategic policy 10 'Jobs and Businesses' of the Core Strategy (2011) and Saved Policy 1.2 'Strategic and Local Preferred Industrial Locations' of the Southwark Plan (2007) by virtue of proposing to introduce residential accommodation in a preferred industrial location.

Decision: Granted with legal agreement

Decision date: 29 January 2021

APPENDIX 4

Consultation Undertaken

Reference:	23/AP/1317
Proposal:	Demolition of the existing building and mixed use redevelopment of the site comprising Purpose-Built Student Housing including associated amenity and ancillary café and cycle workshop (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.
Location:	257-283 Ilderton Road, London, Southwark, SE15 1NS

Notices

Site Notice: Date of notice display: 09.08.2023 **Date of notice expiry:** 30.08.2023

Press Notice: Date of notice publication: 01.06.2023 **Date of notice expiry:** 22.06.2023

Consultation Letters to Neighbours and Local Groups

Recipient Address:	Date Letter Sent:
• 212 Ilderton Road London Southwark	01.06.2023
• 182 - 196 Ilderton Road London Southwark	01.06.2023
• Studio 2 40 - 50 Hatcham Road London	01.06.2023
• Unit 7 Canterbury Industrial Park 297 Ilderton Road	01.06.2023
• 7 Manor Grove London Southwark	01.06.2023
• Unit 8 Canterbury Industrial Park 297 Ilderton Road	01.06.2023
• Unit 10 Canterbury Industrial Park 297 Ilderton Road	01.06.2023
• 9 Barnaby House Manor Grove London	01.06.2023
• 3 Barnaby House Manor Grove London	01.06.2023
• Flat 58 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 57 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 52 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 36 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 33 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 27 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 24 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 17 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 12 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 8 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 2 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 187 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 182 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 157 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 152 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 139 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 136 Vista Heights Block A 227 Ilderton Road	01.06.2023

• Flat 126 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 125 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 111 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 96 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 95 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 90 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 85 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 79 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 41 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 36 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 28 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 16 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 4 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Vista Heights Block A 227 Ilderton Road London	01.06.2023
• 12C Manor Grove London Southwark	01.06.2023
• 12A Manor Grove London Southwark	01.06.2023
• Studio 1 40 - 50 Hatcham Road London	01.06.2023
• 31 Manor Grove London Southwark	01.06.2023
• Unit 6 Canterbury Industrial Park 297 Ilderton Road	01.06.2023
• Unit 1 Canterbury Industrial Park 297 Ilderton Road	01.06.2023
• Unit 9 Canterbury Industrial Park 297 Ilderton Road	01.06.2023
• Advertising Right 224 Ilderton Road London	01.06.2023
• 15 Manor Grove London Southwark	01.06.2023
• Unit 3B Canterbury Industrial Park 297 Ilderton Road	01.06.2023
• Flat 56 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 50 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 44 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 39 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 26 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 22 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 18 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 5 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 193 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 192 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 162 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 155 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 135 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 134 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 129 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 123 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 112 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 102 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 93 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 92 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 89 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 71 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 64 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 57 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 52 Vista Heights Block A 227 Ilderton Road	01.06.2023

• Flat 50 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 42 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 27 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 26 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 2 Vista Heights Block A 227 Ilderton Road	01.06.2023
• 12B Manor Grove London Southwark	01.06.2023
• Iberia House Manor Grove London	01.06.2023
• Unit 3A Canterbury Industrial Park 297 Ilderton Road	01.06.2023
• Car Park Right Sharratt Street London	01.06.2023
• 45 Manor Grove London Southwark	01.06.2023
• 11 Manor Grove London Southwark	01.06.2023
• 53 Manor Grove London Southwark	01.06.2023
• River Of Life Pentecostal Church 12 - 38 Hatcham Road	01.06.2023
• 202 Ilderton Road London Southwark	01.06.2023
• 110 - 116 Ormside Street London Southwark	01.06.2023
• Studio 12 40 - 50 Hatcham Road London	01.06.2023
• Studio 10 40 - 50 Hatcham Road London	01.06.2023
• 6 Barnaby House Manor Grove London	01.06.2023
• 5 Barnaby House Manor Grove London	01.06.2023
• Flat 54 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 41 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 37 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 31 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 10 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 3 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 190 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 185 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 183 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 178 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 174 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 171 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 159 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 138 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 137 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 132 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 127 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 106 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 103 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 98 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 88 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 87 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 86 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 77 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 76 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 60 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 59 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 49 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 38 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 29 Vista Heights Block A 227 Ilderton Road	01.06.2023

• Flat 20 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 5 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 3 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Horizon Court Block B 235 Ilderton Road London	01.06.2023
• 2 Barnaby House Manor Grove London	01.06.2023
• 9 Manor Grove London Southwark	01.06.2023
• 12 Manor Grove London Southwark	01.06.2023
• 7 Barnaby House Manor Grove London	01.06.2023
• White Lion Court Sharratt Street London	01.06.2023
• 3 Manor Grove London Southwark	01.06.2023
• 49 Manor Grove London Southwark	01.06.2023
• 5 Manor Grove London Southwark	01.06.2023
• Unit 2 Canterbury Industrial Park 297 Ilderton Road	01.06.2023
• Flat 46 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 28 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 23 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 16 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 176 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 170 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 169 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 168 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 166 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 153 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 146 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 143 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 141 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 120 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 118 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 117 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 105 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 104 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 101 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 97 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 62 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 54 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 53 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 46 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 45 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 43 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 40 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 33 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 32 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 31 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 24 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 21 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 15 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 6 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 1 Vista Heights Block A 227 Ilderton Road	01.06.2023
• 233 Ilderton Road London Southwark	01.06.2023

• 43 Manor Grove London Southwark	01.06.2023
• Unit 11 Canterbury Industrial Park 297 Ilderton Road	01.06.2023
• Studio 5 40 - 50 Hatcham Road London	01.06.2023
• 25 Hatcham Road London Southwark	01.06.2023
• 4 Barnaby House Manor Grove London	01.06.2023
• 214 Ilderton Road London Southwark	01.06.2023
• Studio 6 40 - 50 Hatcham Road London	01.06.2023
• Studio 4 40 - 50 Hatcham Road London	01.06.2023
• 8 Barnaby House Manor Grove London	01.06.2023
• 21 Hatcham Road London Southwark	01.06.2023
• Car Park Left Sharratt Street London	01.06.2023
• Flat 55 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 53 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 38 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 32 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 13 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 189 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 188 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 179 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 172 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 167 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 161 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 142 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 140 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 133 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 131 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 121 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 116 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 114 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 113 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 108 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 100 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 84 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 69 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 56 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 39 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 18 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 17 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 7 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Unit One And Two 202 Ilderton Road London	01.06.2023
• Street Record Hatcham Road London	01.06.2023
• 19 Manor Grove London Southwark	01.06.2023
• 224 Ilderton Road London Southwark	01.06.2023
• Unit 13 Canterbury Industrial Park 297 Ilderton Road	01.06.2023
• Unit 12 Canterbury Industrial Park 297 Ilderton Road	01.06.2023
• Studio 11 40 - 50 Hatcham Road London	01.06.2023
• 29 Manor Grove London Southwark	01.06.2023
• Studio 7 40 - 50 Hatcham Road London	01.06.2023
• 10 Manor Grove London Southwark	01.06.2023

• Flat 47 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 42 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 30 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 25 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 21 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 20 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 11 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 7 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 4 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 195 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 181 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 180 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 165 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 164 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 151 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 148 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 147 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 130 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 128 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 124 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 119 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 109 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 80 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 66 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 63 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 61 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 58 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 55 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 22 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 13 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 12 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 8 Vista Heights Block A 227 Ilderton Road	01.06.2023
• 180 Ilderton Road London Southwark	01.06.2023
• 25 Manor Grove London Southwark	01.06.2023
• Studio 8 40 - 50 Hatcham Road London	01.06.2023
• Canterbury Industrial Park 297 Ilderton Road London	01.06.2023
• 206 - 210 Ilderton Road London Southwark	01.06.2023
• 27 Manor Grove London Southwark	01.06.2023
• 17 Manor Grove London Southwark	01.06.2023
• 13 Manor Grove London Southwark	01.06.2023
• 47 Manor Grove London Southwark	01.06.2023
• 18 Manor Grove London Southwark	01.06.2023
• Unit 5 Canterbury Industrial Park 297 Ilderton Road	01.06.2023
• 40 - 50 Hatcham Road London Southwark	01.06.2023
• Studio 13 40 - 50 Hatcham Road London	01.06.2023
• Studio 3 40 - 50 Hatcham Road London	01.06.2023
• Barnaby House Manor Grove London	01.06.2023
• Living Accommodation 224 Ilderton Road London	01.06.2023
• 8 Manor Grove London Southwark	01.06.2023

• Street Record Manor Grove London	01.06.2023
• Flat 51 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 48 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 35 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 29 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 15 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 14 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 186 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 177 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 175 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 173 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 163 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 158 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 156 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 122 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 110 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 99 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 94 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 91 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 75 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 74 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 67 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 65 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 51 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 44 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 34 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 30 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 14 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 11 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 10 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 9 Vista Heights Block A 227 Ilderton Road	01.06.2023
• 231 Ilderton Road London Southwark	01.06.2023
• 229 Ilderton Road London Southwark	01.06.2023
• Street Record Sharratt Street London	01.06.2023
• 55 Manor Grove London Southwark	01.06.2023
• 1 Barnaby House Manor Grove London	01.06.2023
• 14 - 38 Hatcham Road London Southwark	01.06.2023
• 1 Manor Grove London Southwark	01.06.2023
• 51 Manor Grove London Southwark	01.06.2023
• Studio 9 40 - 50 Hatcham Road London	01.06.2023
• Flat 49 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 45 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 43 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 40 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 34 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 19 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 9 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 6 Horizon Court Block B 235 Ilderton Road	01.06.2023
• Flat 1 Horizon Court Block B 235 Ilderton Road	01.06.2023

• Flat 194 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 191 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 184 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 160 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 154 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 150 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 149 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 145 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 144 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 115 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 107 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 83 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 82 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 81 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 78 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 73 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 72 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 70 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 68 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 48 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 47 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 37 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 35 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 25 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 23 Vista Heights Block A 227 Ilderton Road	01.06.2023
• Flat 19 Vista Heights Block A 227 Ilderton Road	01.06.2023
• 23 Manor Grove London Southwark	01.06.2023
• 21 Manor Grove London Southwark	01.06.2023
• Unit 4 Canterbury Industrial Park 297 Ilderton Road	01.06.2023
• 227 - 255 Ilderton Road London Southwark	01.06.2023
<u>Re-consultation Notices</u>	
Site Notice:	Date of notice display: 06.02.2024 Date of notice expiry: 27.02.2024
<u>Re-consultation Letters to Neighbours and Local Groups</u>	
Re-consultation letters were sent out to all the neighbours and local groups as per the first round of consultation on 06.02.2024	
<u>Consultation Letters to Internal Consultees</u>	
Initial consultation carried out with all internal consultees, on 13.06.2023.	
<u>Re-consultation Letters to Internal Consultees</u>	
Name of Internal Consultee:	Date of most recent re-consultation: Reply received?
• Highways Development and Management	23.10.2024 YES

• Transport Policy	23.10.2024	YES
• Ecologist	16.09.2024	YES
• Environmental Protection	28.06.2024	YES
• Flood Risk Management and Urban Drainage	20.05.2024	YES
• Community Infrastructure Levy	05.03.2024	YES
• Local Economy	04.03.2024	NO
• Network Development	01.03.2024	NO
• Waste Management	28.02.2024	NO
• Urban Forester	07.02.2024	YES
<u>Consultation Letters to External Consultees</u>		
Initial consultation carried out with all external consultees, on 13.06.2023.		
<u>Re-consultation Letters to External Consultees</u>		
Name of External Consultee:	Date of most recent re-consultation:	Reply Received?
• Great London Authority	29.10.2024	YES
• TfL Spatial Planning	23.10.2024	NO
• Health and Safety Executive (Planning G1)	24.01.2024	YES

APPENDIX 5

Consultation responses received

Reference:	23/AP/1317
Proposal:	Demolition of the existing building and mixed use redevelopment of the site comprising Purpose-Built Student Housing including associated amenity and ancillary café and cycle workshop (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.
Location:	257-283 Ilderton Road, London, Southwark, SE15 1NS

Consultation Responses from Neighbours and Local Groups

Contributor Address:	Date Received:
• 36 Grasmere Point Tustin Estate	20.09.2023
• Renewal Management Ltd	04.07.2023

Old Kent Road Community Review Panel

Report of Community Review: 257–283 Ilderton Road

Monday 15 January 2024

Treasure House, 682 Old Kent Road, SE15 1JF

Panel

Gurmeet Sian (chair)
 Mohammed Bentaleb
 Simon Donovan
 Julia Feeney
 Hazel Flynn
 James Glancy
 Rebecca Lefort
 Mike Levitt
 Sarah Osei
 David Stoker
 Lin Vong

Attendees

Pan Chong	London Borough of Southwark
Tim Cutts	London Borough of Southwark
Ali Weatherup	London Borough of Southwark
Colin Wilson	London Borough of Southwark
Lucy Block	Frame Projects
Yingli Tang	Frame Projects
Kate Trant	Frame Projects

Apologies / copied to

Deborah Denner	Frame Projects
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1. Project name and site address

257–283 Ilderton Road, Southwark, London SE15 1NS
 Planning application reference: 23/AP/1317

2. Presenting team

Robert Grant	EQT Exeter
Russell Petrie	EQT Exeter
Alex Wythe	Alan Camp Architects
Gillian Allan	360 Architecture
Sam Blacker	ROK Planning
Alun Evans	ROK Planning
Katy Greenwood	ROK Planning
Kim Humphreys	Carvil Ventures

3. Planning authority briefing

The site is located within Old Kent Road Site Allocation OKR16, which aims to create 2,200 homes and 2,698 jobs. The Community Review Panel (CRP) has commented on the scheme at a previous review (7 November 2022) at the pre-application stage. At that point, the scheme consisted of 196 conventional homes, a self-storage unit and workspace. However, the initial mixed-use scheme containing residential apartments was no longer viable, and the developer submitted a full application for a revised scheme that would still deliver self-storage facilities and light industrial workspace but replace the residential component with student rooms in a building of 9–30 storeys.

The main amendment to the scheme since the previous review is a change of use class, from conventional residential accommodation to purpose-built student residential units, providing up to 592 beds. The overall design and massing remains almost identical to that previously presented, although the façade design and materiality has developed since the earlier iteration.

Officers would welcome the panel’s views on the type of affordable workspace it would like to see in the area and the functionality of the proposed light industrial workspace. Comments are sought on whether the scheme’s proposed heights and massing integrate satisfactorily with the surrounding area, particularly the emerging nearby tall buildings, and the evolving context of Ilderton Road. The panel is invited to comment on the approach to the student accommodation and the design of the scheme’s landscape and amenity spaces.

4. Community Review Panel's views

Summary

The panel thanks the applicant for the presentation and finds much to commend in the proposals. As a standalone design, the development has a number of positive elements; however, the panel is concerned about the scheme's role in the neighbourhood and its contribution to the local community. The panel has reservations about whether this building type is needed in the area, and suggests that increasing conventional housing provision for local people would be preferable.

Nonetheless, if a need has been identified for these facilities, the panel suggests that further work is done to ensure that the scheme contributes positively to an inclusive neighbourhood, for example, by designing the building as a clearer destination point to attract local people, and creating greater opportunities for interaction between the local community and the student population.

The provision and quality of the light industrial spaces is well-received, and their potential synergy with the self-storage facility. The scheme has the potential to contribute positively to regenerating the Old Kent Road.

The panel supports the allocation of Section 106 funding to creating local community benefits such as subsidising housing rental costs for local young people and contributing to the development of local social housing sites.

The greening and biodiversity opportunities offered by the roof areas are welcomed, although the panel observes that residents' access to these spaces is restricted. The panel is concerned about the affordability of the student accommodation.

The panel feels that the proposed tower is too high, and that the materials and façade design may contribute to an overbearing appearance on the skyline. The design of the self-storage frontage is successful and, while the panel likes the use of the red brick in the scheme, it has questions about the overall material palette.

Heights and massing

- While the panel recognises that the height of the tower is in keeping with the other emerging tall buildings nearby, it is concerned that 30 storeys is too high, and asks for further consideration of the building's height.
- The panel feels that the façade design and materials may contribute to a potentially overbearing appearance on the skyline and would like to see the development of alternative treatments.

Contribution to context and local community

- While the proposals offer many positives, the panel feels that the scheme is disconnected from the neighbourhood, with few opportunities for the student residents and the local community to interact.
- It would like to see further consideration of the introduction of publicly accessible areas on the ground and first floor, such as a café, exhibition spaces and other public uses. This would create a sense of destination and improve the connection with Old Kent Road.

Landscape and amenity space

- The panel welcomes the greening and biodiversity opportunities offered by the roof areas. However, it notes that residents' access to these spaces is restricted to the second and tenth floors, and would like to see consideration given to increasing access.
- The panel appreciates the constraints on the ground floor greening at Ilderton Road created by the council's preference for wider pavements, but supports consideration of further greening opportunities at this level.

Student accommodation

- A core role of the panel is to assess the implementation of the Old Kent Road Area Action Plan (AAP), in which student accommodation is not considered. While the panel is happy to review this scheme, it expresses concerns over the potential diversion from the AAP.
- The panel would like to see how the scheme could include a proportion of housing for permanent residents. It recommends that the council considers the retention of at least part of the site for affordable homes for local residents.
- The panel has concerns about the affordability of the student accommodation, with the entry level at a higher cost than the London Plan's threshold for Purpose-Built Student Accommodation (PBSA). It asks that the council considers contributing more to creating genuinely affordable student housing in the borough.
- The panel highlights the importance of the provision of facilities such as laundry, cleaning, recycling and refuse disposal in the student accommodation and would welcome further detail on these aspects of the scheme.

Workspace typology and design

- The panel admires the provision and quality of the light industrial spaces and their potential synergy with the self-storage facility, and supports the objective to maintain the flexibility and affordability of these spaces.

- The panel feels that the proposed workspaces have the potential to attract small businesses, community start-ups and makers. It asks that further thought is given to ensuring that these activities contribute positively to the neighbourhood and the local community.

Architecture and materials

- The design of the self-storage frontage is successful and the panel admires the wraparound element of this part of the scheme.
- The panel likes the use of the red brick in the scheme, but recommends the introduction of more colour in the overall material palette, as well as further thought given to more textural variation on the building's façades.
- The building's exterior design does not communicate its internal functions, and, aesthetically, it does not yet sit comfortably in its immediate context. The panel suggests further consideration is given to the building's exterior design.
- The panel admires the visual appearance of the building in the presentation, but questions how the building will look once it has weathered. It asks for careful consideration of the specification of materials.
- Further thought on the potential for increasing the height and size of the windows, as well as full-height glazing, would be welcomed by the panel.
- While the demand for student accommodation is currently high, the panel stresses the importance of flexible design to meet future changes in requirements.

Management

- The panel recognises the challenges created by the three individual activities in the scheme – the student accommodation, self-storage and the fablab spaces – being managed by separate agents. It underlines the importance of the role of the managing agents in ensuring that the scheme contributes positively to the neighbourhood and local community, and would welcome further clarity on how the partnership between the three agents will work.

Community projects

- The panel supports the applicant in developing proposals for the allocation of funding from the developer towards the costs of providing community and social infrastructure. For example, in collaboration with the council, funding could be allocated to subsidise housing rental costs for local young people; development of this suggestion would be welcome.

- This type of funding could contribute to the development of local social housing sites, and the panel recommends further investigation of this proposal.
- The panel recommends looking at precedents such as A House for Artists, an affordable housing scheme for 14 artists and their families in Barking and Dagenham where, for reduced rent, the artists deliver free creative programmes for the neighbourhood.

Next steps

- The panel would like to see the applicant work with planning officers to resolve the issues identified by this review as part of ongoing amendments to the planning application submitted.

Heads of Terms for Section 106 Agreement

Reference:	23/AP/1317
Proposal:	Demolition of the existing building and mixed use redevelopment of the site comprising Purpose-Built Student Housing including associated amenity and ancillary café and cycle workshop (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.
Location:	257-283 Ilderton Road, London, Southwark, SE15 1NS

	<u>Obligation</u>	<u>Mitigation / Terms</u>
1.	Student accommodation subject to Bakerloo Line Extension	
	STUDENT ACCOMODATION DELIVERY	<p>The student accommodation shall not be implemented prior to the BLE construction contract being in place unless agreed in writing by the Council in consultation with TfL and GLA.</p> <hr style="border-top: 1px dashed black;"/> <p>Applicant's Position: Agreed.</p>
2.	Café: Delivery and public access	
	DELIVERY	<p>The 109.7 square metre Café within the ground floor communal internal student amenity space of PBSA Block is to be completed to shell and core, and made available for occupation no later than 75% occupation of the student accommodation within the host building.</p> <hr style="border-top: 1px dashed black;"/> <p>Applicant's Position: Agreed.</p>
	PUBLIC ACCESS	<p>Notwithstanding the ancillary-to-PBSA function of the wider room in which the café is located, free and unrestricted access for the general public into the café (including its associated dining area) shall be available at all times of café operation.</p> <hr style="border-top: 1px dashed black;"/> <p>Applicant's Position: Agreed.</p>
3.	Cycle workshop Delivery, strategy and public access	
	DELIVERY	<p>The 26.5 square metre Cycle Workshop within the ground floor visitor cycle store of PBSA Block is to be completed in accordance with the approved Specification, and made available for use no later than 75% occupation of student accommodation within the host building.</p> <hr style="border-top: 1px dashed black;"/> <p>Applicant's Position: Agreed.</p>
	CYCLE WORKSHOP STRATEGY	<p>Not less than 6 months before the anticipated date of first occupation of any PBSA units, a Cycle Workshop Strategy shall be submitted to and approved by the Council, setting out:</p> <ul style="list-style-type: none"> - a marketing strategy for an operator to carry out bike repair services, and how the Cycle Workshop will continue to be marketed following first Occupation to ensure that the Cycle Workshop remains occupied;

	<ul style="list-style-type: none"> - lease/licence terms and details; - operation hours; - community outreach programme to promote the use of the Cycle Workshop <p>other details as the Council may reasonably require.</p>
	Applicant's Position: Agreed.
PUBLIC ACCESS	Notwithstanding the ancillary-to-PBSA function of the wider room in which the cycle workshop is located, free and unrestricted access for the general public into the Cycle Workshop shall be available at all times of cycle workshop operation as per the approved Cycle Workshop Strategy.
	Applicant's Position: Agreed.
4.	Design: Retention of architectural team
ARCHITECT NOVATION	Reasonable endeavours shall be made to ensure the original design team (i.e. Alan Camp Architects LLP & 360 Architecture) continues to be employed as the project architect or design consultant to carry out the RIBA Stage 3 and 4 design work. Unless otherwise approved by the Council.
	Applicant's Position: Agreed.
5.	Affordable housing : Payment in lieu
AFFORDABLE HOUSING PAYMENT IN LIEU	Applicant is to pay a minimum of £20,700,000 (subject to BCIS All in Tender Price Index) in lieu of providing on-site affordable housing, equivalent to the maximum viable amount (as agreed between the applicant and the Council's independent assessor).
	The total sum is to be paid in three tranches linked to stages of construction, as follows: <ul style="list-style-type: none"> • 25% payable on or before Implementation (BCIS All in Tender Price Index-linked) • 50% payable on or before Practical Completion (BCIS All in Tender Price Index-linked) • 25% payable 6 months Post First Occupation (BCIS All in Tender Price Index-linked)
	Applicant's Position: Agreed.
AFFORDABLE HOUSING UNITS: EARLY STAGE REVIEW	Early Stage Review to be required if substantial implementation has not occurred within 24 months of planning permission being granted.
	In the event that an additional in-lieu affordable housing payment is required following the identification of a profit surplus through the Early Stage Review process, first occupation of the student accommodation shall be prohibited unless and until said monies (BCIS All in Tender Price Index-linked) have been paid in full.
	Applicant's Position: Agreed.
AFFORDABLE HOUSING UNITS:	Late Stage Review to be required at 9 months after first occupation of the Student Accommodation subject to upper cap of additional £8,900,000

LATE STAGE REVIEW	<p>maximum (equivalent to 50% habitable rooms @£100,000 per habitable room) and viability tested and Index Linked.</p> <p>In the event that an additional in-lieu affordable housing payment is required following the identification of a profit surplus through the Late Stage Review process, occupation of more than 75% of the student accommodation in the third academic year shall be prohibited unless and until said monies (BCIS All in Tender Price Index-linked) have been paid in full.</p> <p>Applicant's Position: Agreed.</p>
6. Student accommodation: Operation and management	
STUDENT MANAGEMENT PLAN	<p>Prior to occupation of the PBSA development, a Final Student Management Plan is to be submitted to and approved by the Council. The Final Student Management Plan shall be based on the principles established by the application-stage Student Management Plan and shall include details of:</p> <ul style="list-style-type: none"> - the day to day operation of the student housing to ensure noise and disturbance is minimised during the day- and night-time (including codes of behaviour / conduct and other protocols for managing breaches of acceptable behaviour); - the logistics and coordination of the move-in and move-out arrangements to minimise disruption to the public highway (and shall include specified management measures in respect of both the move-in and move-out period, not just the former, including coordination of arrangements with other student residences in the area so as to avoid overload at peak times); - deliveries and servicing management; - security and surveillance measures; - strategies for establishing and managing relationships and lines of communication with local residents and other potentially affected parties; - a strategy specific to the summer lets period (covering all of the above-listed requirements as well as how coach and taxi arrivals would be discouraged and, where they do occur, how they would be managed). <p>The approved Final Student Management Plan (as amended from time to time) shall be complied with throughout the lifetime of the development.</p> <p>The Final Student Management Plan shall be eligible for amendments from time-to-time, subject in each instance to the Local Planning Authority's approval.</p> <p>Applicant's Position: Agreed.</p>
USE OF PREMISES	<p>The PBSA development is:</p> <ul style="list-style-type: none"> - not to be used and occupied for anything other than its authorised purpose as accommodation available for letting as student accommodation to students; - to be used at all times as a single planning unit, with no part of it to be rented, sold, sub-let, licensed or otherwise disposed of in any form as a separate planning unit; and - with respect to all parts of the basement and ground floor of the building, prohibited from being used in the future for sleeping accommodation <p>The student accommodation may be let to non-students during the holiday period (which shall be a maximum of 11 weeks in any one year period</p>

	running from September 1 st to August 31 st).
	Applicant's Position: Agreed.
7.	Student accommodation: Occupier facilities
WHEELCHAIR PBSA UNITS DELIVERY	Provision of 30 easily adaptable wheelchair PBSA units: Applicant's Position: Agreed.
WHEELCHAIR PBSA UNITS MARKETING	Suitable marketing of the PBSA wheelchair units shall be carried out throughout the lifetime of the premises, with the non-wheelchair units to be let to non-disabled prospective tenants wherever possible (so that, up until the beginning of term, a maximised number of wheelchair units remain available for take up by those who require them). Applicant's Position: Agreed.
8.	Local economy: Employment and training
CONSTRUCTION PHASE JOBS/ CONTRIBUTIONS	The development must: <ul style="list-style-type: none"> - deliver 63 sustained jobs of minimum 26 weeks to unemployed Southwark residents calculated on the basis of 1 resident per 500 sqm GEA; - deliver 63 short courses calculated on the basis of 1 course per 500 sqm GEA; and - support 16 construction industry apprentices during the construction phase calculated on the basis of 1 resident per 2000 sqm GEA. <p>Or make the pro-rata Employment and Training Contribution which, at maximum, would be £304,350 (RPI All Items index linked). This breaks down as:</p> <ul style="list-style-type: none"> - £270,900 against sustained jobs calculated on the basis of £4300 per shortfall in jobs; - £9,450 against short courses calculated on the basis of £150 per shortfall in courses; and - £24,000 against construction industry apprenticeships calculated on the basis of £1500 per shortfall in apprenticeships. Applicant's Position: Agreed.
CONSTRUCTION PHASE EMPLOYMENT, SKILLS AND BUSINESS PLAN	The Plan would be expected to detail: <ul style="list-style-type: none"> - methodology of training, skills, support etc.; - targets for construction skills and employment outputs; - methodology for delivering apprenticeships; and <p>local supply chain activity methodology.</p> Applicant's Position: Agreed.
END-USE PHASE EMPLOYMENT, SKILLS AND BUSINESS PLAN	The Plan would be expected to deliver 9 sustained jobs of minimum 26 weeks to unemployed Southwark residents Or make the pro-rata Employment in the End Use Contribution which, at maximum, would be £38,700 (RPI All Items index linked) calculated on the

	basis of £4,300 per shortfall in jobs.										
	Applicant's Position: Agreed.										
LOCAL PROCUREMENT	The applicant should allow local businesses to tender for the procurement of goods and services generated by the development both during and after construction.										
	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.										
9.	Local economy: Affordable workspace										
MINIMUM PROVISION	Not to occupy the development until no less than 1,030 square metres of affordable workspace has been fully completed in accordance with the Minimum Specification (see below).										
	Applicant's Position: Agreed.										
LIFETIME AND KEY TERMS OF LEASE	In the event that one or more tenants are secured, the affordable workspace shall 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 Lease agreements with all affordable workspace occupiers shall be subject to conditions including the following:										
	<table border="1"> <tr> <td>Rent level and any inclusions/ exclusions</td> <td>- No more than £15 per square foot GIA per annum; all to be exclusive of any rates but inclusive of service and building management charges</td> </tr> <tr> <td>Rent Review</td> <td>- Five yearly (no more than in line with RPI)</td> </tr> <tr> <td>Rent Free Period</td> <td>- up to a maximum of 12 months from the grant of the lease if requested by the tenant such period to be equivalent to any period required for any fit out of the premises by the tenant and to be reflective of the reasonable costs incurred in such fit out.</td> </tr> <tr> <td>Break clause</td> <td>- Tenants will be entitled to operate a break clause after 5 years</td> </tr> <tr> <td>Rights granted</td> <td>- Tenants will be granted rights of access including emergency escape rights - Rights of access and use of the loading facilities including loading bays and lifts - Rights of access and use of refuse facilities - Right and access and use of bicycle storage</td> </tr> </table>	Rent level and any inclusions/ exclusions	- No more than £15 per square foot GIA per annum ; all to be exclusive of any rates but inclusive of service and building management charges	Rent Review	- Five yearly (no more than in line with RPI)	Rent Free Period	- up to a maximum of 12 months from the grant of the lease if requested by the tenant such period to be equivalent to any period required for any fit out of the premises by the tenant and to be reflective of the reasonable costs incurred in such fit out.	Break clause	- Tenants will be entitled to operate a break clause after 5 years	Rights granted	- Tenants will be granted rights of access including emergency escape rights - Rights of access and use of the loading facilities including loading bays and lifts - Rights of access and use of refuse facilities - Right and access and use of bicycle storage
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	<ul style="list-style-type: none"> - Rights to connect to District Heating Network to be separately metered and charged accordingly.
	<p>The 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>
<p>MINIMUM SPECIFICATION OF UNIT(S)</p>	<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 - Regulations (DDA etc.) compliance <p>The affordable workspace is to be completed in accordance with the approved minimum specification prior to first occupation.</p> <p>Applicant's Position: Agreed.</p>
<p>TENANT ELIGIBILITY</p>	<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>In the event that the affordable workspace remains unoccupied in a period of not less than 9 months from the completion of the affordable workspace and three months from the end and/or termination of any lease and/or license of the affordable workspace after first occupation, the affordable workspace may be marketed to end users living or whose business is primarily based outside the Borough.</p> <p>Applicant's Position: Agreed.</p>
<p>AFFORDABLE WORKSPACE STRATEGY</p>	<p>Not less than 6 months before the anticipated date of first occupation of any affordable workspace, an Affordable Workspace Strategy shall be submitted to and approved by the Council prior to occupation of the development, 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; - a marketing strategy that prioritises small and independent businesses from the local area with an identified need, and how the affordable workspace will continue to be marketed following first Occupation to ensure that the Affordable Workspace remains occupied; - 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;

	<ul style="list-style-type: none"> - 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; - community outreach programme - other details as the Council may reasonably require.
	Applicant's Position: Agreed.
EXHIBITION SPACE	At least 50 sqm exhibition space within the ground floor of the development shall be made available for use by local schools or local arts organisations or local community organisations on at least twenty five occasions (at least 8 hours for each occasion) in each calendar year for the duration of the Development at no financial cost to them. Quarterly reports are to be provided as and when requested by the Council.
	Applicant's Position: Agreed.
MONITORING	On the 1 April each year following first occupation, annual monitoring reports shall be submitted to the Council for approval. They should detail: <ul style="list-style-type: none"> - the extent to which the objectives set out within the Affordable Workspace Strategy have been achieved; - the level of occupancy of the affordable workspace and a breakdown of those in occupation by eligibility, sector and size; - an overview as to the terms of occupation of the affordable workspace including confirmation as to the amount of discount applied to rent; - measures to improve the operation of the affordable workspace;
Local Economy: Use of Premises	
USE	To retain the 7,977 sqm employment floorspace as Class E(g)(iii) or B(8) or B(2) floorspace through the lifetime of the development unless otherwise agreed in writing by the Council.
10.	Landscape and public realm: Off-site open space and trees
PUBLIC OPEN SPACE: IN-LIEU PAYMENT	Develop to pay £242,720.00 (BCIS index linked) to mitigate the failure to deliver all of the public open space requirement arising from the PBSA housing elements of the proposal calculated on the basis of £205 per shortfall of the public open space.
	Applicant's Position: Agreed.
TREE LOSS PAYMENT	In the event that any of the 14 proposed trees cannot be delivered, the developer is to pay to a sum of £10,000 per undelivered tree (BCIS index linked)
	Applicant's Position: Agreed.
11.	Transport: Construction phase mitigation
CONSTRUCTION MANAGEMENT MONITORING	Prior to implementation, the developer is to contribute £7,920 (RPI All Items index linked), based on £40 for every three PBSA units, to cover the cost incurred by the Council's Highways Network Management division in providing the following services:

	<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.
12.	Transport: Development mitigation
LONG-TERM PROVISION OF CARGO BIKES FREE-OF-CHARGE	Prior to first occupation, the 2 x cargo bikes shall be installed and available for use, and thereafter for the lifetime of the development the cargo bikes shall remain free-of-charge and for the exclusive use of the occupiers and tenants of the commercial development.
TfL CYCLE HIRE DOCKING STATION CONTRIBUTION	Prior to first occupation, the developer is to contribute £18,789 (BCIS index linked) towards expansion of one or more TfL cycle docking stations in the vicinity of the site on the basis of 50 per 100sqm for commercial space of E(g)(iii)/B8 uses and £25 per student room
	Applicant's Position: Agreed.
TfL PUBLIC TRANSPORT CONTRIBUTION	The developer is to contribute £534,600 (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. The sum shall be paid one year prior to occupation of the student accommodation.
	Applicant's Position: Agreed.
TfL BUS STOPS ENHANCEMENT CONTRIBUTION	The developer is to contribute £100,000 (BCIS index linked) towards both the nearby northbound and southbound bus stops on Ilderton Road such as the provision of countdown or equivalent. The sum shall be paid one year prior to occupation of any part of the development.
	Applicant's Position: Agreed.
TfL LEGIBLE LONDON SIGNAGE CONTRIBUTION	Prior to implementation, with the exception of any site clearance/demolition and archaeological investigative works, the developer is to contribute £30,000 (BCIS 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.
CAR CLUB MEMBERSHIP	Within three months of the first occupation of each commercial units, free membership shall be offered to first commercial operators of the commercial units within the development to a nearby (within 800meters) Car Club vehicle provider (minimum duration of the membership is to be 1 year)
	Applicant's Position: Agreed.
REVISED DELIVERY AND SERVICING	Prior to commencement of the PBSA, a revised Delivery and Servicing Plan is to be submitted to and approved by the Council.

PLAN	Applicant's Position: Agreed.
DELIVERY AND SERVICING MONITORING PLAN	<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>
DELIVERY AND SERVICING MANAGEMENT BOND	<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 £23,800, comprising:</p> <ul style="list-style-type: none"> - a cash deposit of £21,400.00 (RPI All Items index linked), calculated on the basis of £100 per three PBSA bedspaces and £100 per 500sqm non-residential floorspace; - a monitoring fee of £2,400.00 (RPI All Items index linked) to cover the Council's costs of assessing the quarterly monitoring. <p>For a period of two years from opening of the student accommodation scheme 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 on a quarterly basis. 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 meets is baseline target, the Council will retain the monitoring fee.</p> <p>Applicant's Position: Agreed.</p>
DELIVERY AND SERVICING MONITORING Fee	<p>The developer is to pay a sum of £1,600 (RPI All Items index linked) towards monitoring the terms of Delivery and Service Plan and administering the Delivery and Servicing Bond.</p> <p>Applicant's Position: Agreed.</p>
EVCP PROVISION	<p>Each Blue Badge bay for commercial development and the PBSA shall be able to access active Electric Vehicle Charging Points (EVCPs), and they shall be operational from the first occupation of the commercial development and the PBSA respectively.</p> <p>The EVCPs shall be retained in full working order thereafter for the lifetime of the development.</p> <p>Applicant's Position: Agreed.</p>
PARKING PERMIT ELIGIBILITY EXCLUSION	<p>All of the PBSA occupants and tenants of the commercial space at the development shall be prohibited from being eligible for CPZ parking permits.</p> <p>Applicant's Position: Agreed.</p>
WASTE MANAGEMENT	<p>For the lifetime of the development, the owner shall ensure that a contract is in place with a commercial provider of refuse/recycling collection services.</p>

13.

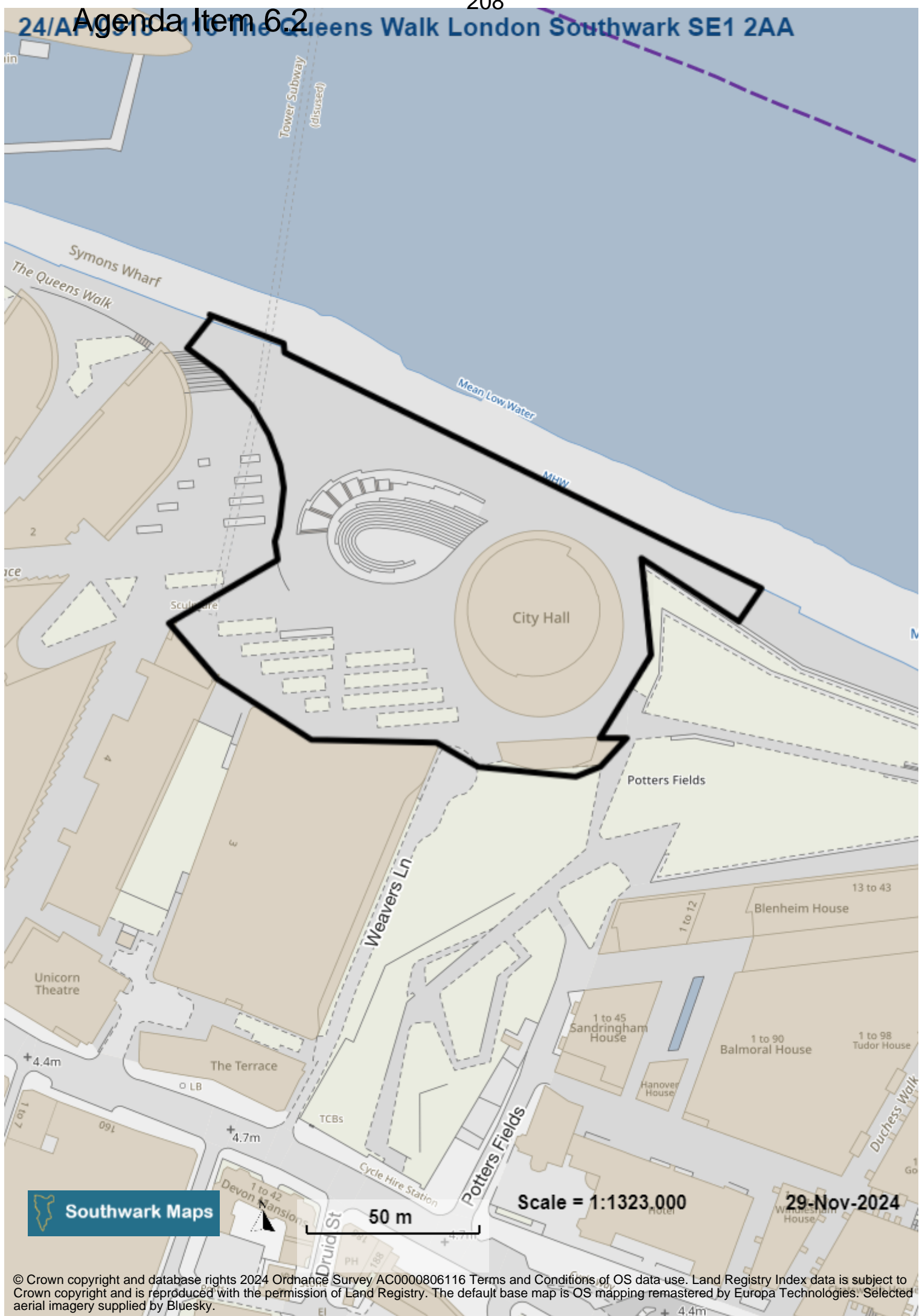
	Applicant's Position: Agreed.
Transport: Highway impacts mitigation	
SCHEDULE of HIGHWAY CONDITION	Prior to commencement, the developer is to submit an initial Schedule of Highway Condition to the LPA (who shall liaise with the Highways Authority) and receive its approval in writing.
	Applicant's Position: Agreed.
LAND ADOPTION	The developer is to dedicate the land along Ilderton Road and Sharratt Street to the Council.
	Applicant's Position: Agreed.
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 LPA (who shall liaise with the Highways Authority) and receive its approval in writing.</p> <p>This Specification, detailed design and estimated costs shall comprise the following parcels of works, and all shall be constructed in accordance with SSDM standards:</p> <ul style="list-style-type: none"> - Provide an e-scooter and e-bike on-street bay on Sharratt Street to promote sustainable travel. - Provide 12 visitor cycle stands on Sharratt Street and 10 visitor cycle stands on Ilderton Road - Provide 14 trees along Sharratt Street and associated maintenance costs - Provide a new zebra crossing with raised table on Ilderton Road - Repave the footways including new kerbing fronting the development on Ilderton Road and Sharratt Street using materials in accordance with Southwark's Streetscape Design Manual - SSDM (precast concrete paving slabs with 150mm wide silver grey granite natural stone kerbs). - Construct new vehicular crossover on Sharratt Street in accordance with SSDM standards. - Remove the existing bellmouth entrance on Sharratt Street and rebuild kerb and footway in accordance with SSDM standards - Remove / relocate any unnecessary street furniture fronting the development in order to improve effective footway widths. - Improve pedestrian crossings in the vicinity of the development, including raised crossings and raised junctions if required. The applicant should design them in accordance with the SSDM requirements. - Promote all necessary Traffic Regulation Orders (TMOs) to amend any parking controls and any amendments to existing waiting and loading restrictions. - Refresh road markings following kerb installation. - Rectify any damaged footways, kerbs, inspection covers and street

	<p>furniture due to the construction of the development.</p> <ul style="list-style-type: none"> - Upgrade street lighting to current LBS standards Please contact George Livingstone at George.Livingstone@southwark.gov.uk for further details
	Applicant's Position: Agreed.
S278 AGREEMENT DEADLINE	<p>Prior to commencement of the agreed highway works, the developer is to enter into a Highway Agreement under Section 278 (and Section 38).</p>
	Applicant's Position: Agreed.
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 LPA (who shall liaise with Council's Highways Structures Team).</p>
	Applicant's Position: Agreed.
14. Sustainability	
CONNECTION TO DISTRICT HEAT NETWORK	<p>The developer shall use all reasonable endeavors to enter into agreements for the connection of the PBSA to a DNH and to enter into a heat agreement with a DNH provider within 12 months of the date of this agreement.</p>
FUTURE- PROOFED CONNECTION TO DISTRICT HEAT NETWORK	<p>Prior to first occupation of the commercial development, a DHN Energy Strategy must be approved setting out how the remaining part of the development will be designed and built so that all parts of it will be capable of connecting to any future DHN.</p> <p>Council to retain right to serve Connection Notice at regular intervals, with applicant to retain right to submit feasibility study in response.</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 (20.2 tonnes/CO2). This equates to 10.1 tonnes/CO2. Calculated applying the Council's current tariff rate of £95/tonne for 30 years, this is £28,731 (RPI All Items index linked).</p>
	Applicant's Position: Agreed.
CARBON OFFSET PAYMENT 2	<p>No later than 4 weeks following occupation of the development, the owner shall submit an Occupation Stage Energy Review 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</p>

	<p>applicant shall pay the Carbon Green Fund Contribution 2 (thereby fully offsetting the differential between on-site as-built carbon savings and net zero). 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 twelve 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> <hr/> <p>Applicant's Position: Agreed.</p>
BE SEEN MONITORING	<p>Prior to implementation of the development (with the exception of demolition), the owner shall submit to the GLA and the Council accurate and verified estimates of the 'Be Seen' energy performance indicators.</p> <p>Prior to occupation of the development the owner shall provide to the GLA and the Council updated accurate and verified estimates of the 'Be Seen' energy performance indicators.</p> <p>On the first anniversary of occupation or following the end of the Defects Liability Period (whichever is the later) and at least for the following four years after that date, the Owner shall submit to the GLA accurate and verified annual in-use energy performance data for all relevant indicators.</p> <p>In the event that the 'in-use stage' evidence shows that the 'as-built stage' performance estimates have not been or are not being met, the owner shall identify the causes of underperformance and the potential mitigation measures. The owner shall submit to the GLA and the Council a 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 accordance with the approved Be Seen Mitigation Measures Plan.</p> <hr/> <p>Applicant's Position: Agreed.</p>
GREENFIELD RUNOFF RATE STRATEGY	<p>Prior to occupation of the development, the measures set out in the Greenfield Run-off Rate Strategy have been delivered.</p> <hr/> <p>Applicant's Position: Agreed.</p>
GREENFIELD RUNOFF RATE CONTRIBUTION	<p>Within 28 days of first Occupation of each Building, the developer is to commission an independent assessment of the effectiveness of the Greenfield Run-off Rate Strategy.</p> <p>In the event of a shortfall between the actual run off rate and the target run-off rate set out within the Greenfield Run-off Rate Strategy, the developer shall pay the Greenfield Runoff Rate Contribution calculated at a rate of £366 per cubic metre of shortfall in surface water attenuation storage required (BCIS index linked).</p>

	Applicant's Position: Agreed.
15.	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 but with reasonable cap applied).
	Applicant's Position: Agreed.

24/AN/2016/110 The Queens Walk London Southwark SE1 2AA



Tower Subway (disused)

Symons Wharf
The Queens Walk

Mean Low Water

MHW

City Hall

Sculpture

Potters Fields

Weavers Ln

Unicorn Theatre

The Terrace

Blenheim House

1 to 45 Sandringham House

1 to 90 Balmoral House

1 to 98 Tudor House

Southwark Maps

50 m

Scale = 1:1323,000

29-Nov-2024

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Meeting Name:	Planning Committee (Major Applications) B
Date:	10 December 2024
Report title:	<p>Development Management planning application: Application 24/AP/0918 for: Full Planning Application</p> <p>Address: 110 The Queens Walk, London, Southwark, SE1 2AA</p> <p>Proposal: Alteration (including demolition) and extension of the existing office building for use as Offices (Class E(g)(i); Flexible Commercial (Class E) to include additional floorspace through extensions; altered and additional entrances; creation of office amenity terraces and plant enclosures; facade alterations including urban greening and associated works.</p> <p>Associated works including deconstruction / removal of an existing garage / kiosk structure and provision of new hard and soft landscaping within the public realm including improvements to the Scoop, and other works incidental to the development.</p> <p>(The site is within the setting of the Grade 1 listed Tower Bridge, the Tower of London World Heritage site, and the Tooley Street and Tower Bridge Conservation Areas)</p>
Ward(s) or groups affected:	London Bridge & West Bermondsey
Classification:	Open
Reason for lateness (if applicable):	Not Applicable
From:	Director of Planning and Growth
Application Start Date: 15.04.2024	Application Expiry Date: 14.07.2024
Earliest Decision Date: 08.05.2024	

Recommendation

1. That planning permission is granted subject to conditions, the applicant entering into an appropriate legal agreement, and referral to the Mayor of London and the secretary of state.

2. the event that the requirements of paragraph 1 above are not met by 28 February 2025 the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 437.
3. That the director of Planning and Growth be authorised under delegated authority to make any minor modifications to the proposed conditions and s106 obligations arising out of detailed negotiations with the applicant or the Mayor of London, which may necessitate further modification and may include the variation, addition, or deletion of the conditions as drafted.

EXECUTIVE SUMMARY

4. The site approximately 1.089 hectares in size and the building is currently empty. This was however previously used by the GLA prior to moving to their new offices in East London. The Scoop as well as the existing garage building also form part of the site.
5. Planning permission is being sought to partially demolish and alter the existing office building in terms of footprint design and usage. For instance, there would be an increase in depth from approximately 41.9m to approximately 56.1m. This is an increase of 14.2m. For the avoidance of doubt, the building would not be fully demolished, the core of the building would remain in place.
6. The application would also make changes to The Scoop area. It would amend the access and then provide access to a commercial space on the lower ground floor. In addition, the proposed development would remove the existing garage and would replace this with soft landscaping, which would also be introduced in other parts of the site.
7. Below shows the size of the existing and proposed buildings and areas (such as the new retail area) and what the differences would be:

Existing	NIA (sqm)	GIA (sqm)	GEA (sqm)
Office	9,899.80	18,165.90	18,975.30
Retail (Class E)	60.7	61.6	61.9
Total	9,960.50	18,227.50	19,037.20
Proposed			
Office	10,530	18,618	19,555.30
Flexible commercial (Class E)	2,436	3,380	3,605.70
Total	12,966.00	21,998.00	23,161.00
Difference			
Office	630	452.1	580.00
Retail/commercial	2,375	3,318	3,543.80
Total	3,005.50	3,770.50	4,123.80

8. As shown above, there would be an increase in GIA of 452.1 sqm of office space and 3318 sqm of retail space. The proposed development would also deliver an uplift in employment of 145 jobs:

	Existing	Proposed	Difference
Jobs	828	973	+145

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

	Existing	Proposed	Change +/-
Urban greening factor	-	0.206	+0.43
BNG uplift	1.74	2.03	0.29 (16.95%)
Electric Vehicle Charging Points	0 (zero)	2 on-site	
Cycle parking spaces	72	435 spaces	+363
Increase in jobs on the site	828	973	+145

10. The principle of the proposed development in terms of land use is supported. Being on Borough Open Land, small extensions of buildings are permitted under the Southwark Plan. The proposed development would also alter and amend the character and appearance of a well renowned building. It would however help with items such as the usability and sustainability of the building. For instance, there are issues with beams inhibiting the use of the space as well as cleaning the windows. The proposed development would deliver a scheme that would be Net Zero Carbon, at least BREEAM Excellent, and compliant with other industry-led accreditation schemes relating to sustainability and wellness. A significant driver of the changes is to improve the energy performance of the building which would go from an EPC D to B.
11. The proposed changes in design would retain a number of well recognised elements. An example being the curvature of the north elevation and the reference to the diagrid. The proposed changes would however introduce about a modern interpretation with large areas of greening both on the building as well as in the surrounding area. These alterations would be readily visible from The Rill where the designed view Tower Bridge would be affected. This is however a kinetic view which changes when walking down The Rill. This means that the impact and visibility of the South Tower also changes depending on where the viewer stands. The impact upon Tower Bridge as well as the other surrounding heritage assets are deemed to be at the lower end of less than substantial harm to the setting of the surrounding heritage assets.

Given the minimal changes in height, the development would not materially alter the protected views.

12. The Environment Agency have recommended conditions of which one, a requirement for a flood defence raising strategy, has not been recommended by officers and they object on that basis. The reasons for officers not recommending the condition is detailed in paragraphs 200-204. In summary, the EA have asked for a condition for a flood defence raising strategy, but this does not meet two of the tests for planning conditions- being reasonable and relevant to the development to be permitted. No works are proposed to the flood defence or within its vicinity and the proposal is not a redevelopment which is why officers do not recommend the condition. It is this reason a referral to the secretary of state as recommended in paragraph 1 is needed.
13. The proposed development would not have a significant on the public transport network, subject to improvements to the walking and cycling environment, to be secured through the S106 and planning conditions. The development would not alter the existing parking or servicing arrangements which would still occur through the existing basement. 435 cycle parking spaces are being proposed. This is in accordance with the Southwark and London Plan. There are however issues with the mix and there would be a shortfall of short-stay parking. The scheme proposes 60 spaces, in addition to the 44 existing spaces, taking the total to 104 spaces. This is a shortfall on the number of spaces required by both the London Plan (194 spaces) and the Southwark Plan (256 spaces). However, this is considered acceptable based on the proposed uplift in floorspace, the relatively low utilisation of current cycle parking provision on the More London Estate, and the need to balance cycle parking requirements with the ability to deliver public realm improvements
14. The proposed development would attain a BNG uplift of 16.95% and there would also be a UGF of 0.206. This is under the required 0.3 but the proposed development would significantly increase planting on the site. There would be a 104% increase in planting. The scheme has therefore maximised the amount of planting on the wider site while keeping space for pedestrians in this busy area of the borough.

BACKGROUND INFORMATION

Site location and description

15. 110 Queen's Walk was formerly City Hall and includes the area immediately surrounding its structure. This includes the area known as The Scoop as well as the garage and café to the south of the site and which is next to Potters Fields Park. In total, the site measures 10,890sq.m.

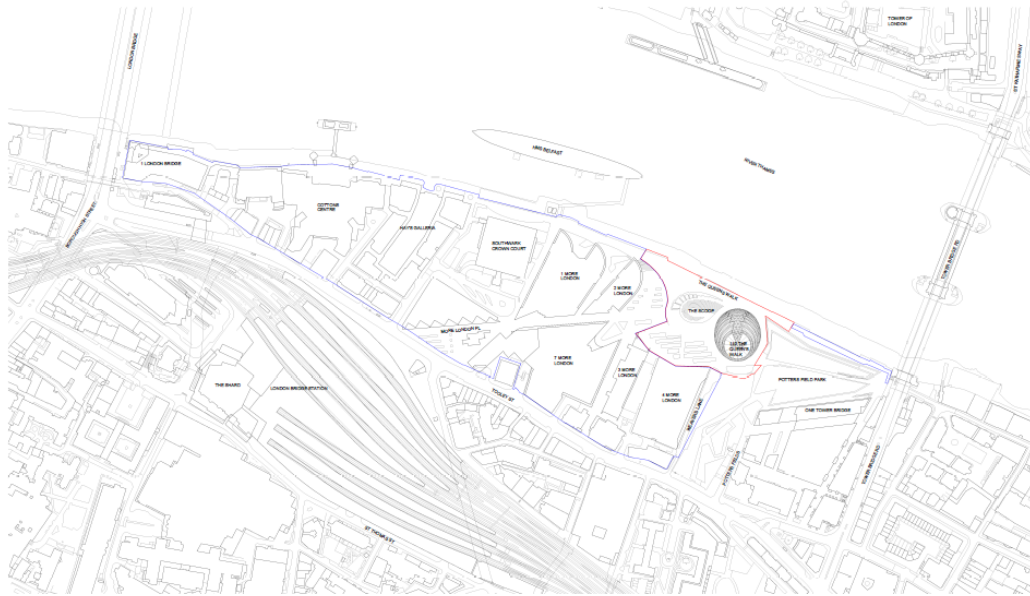
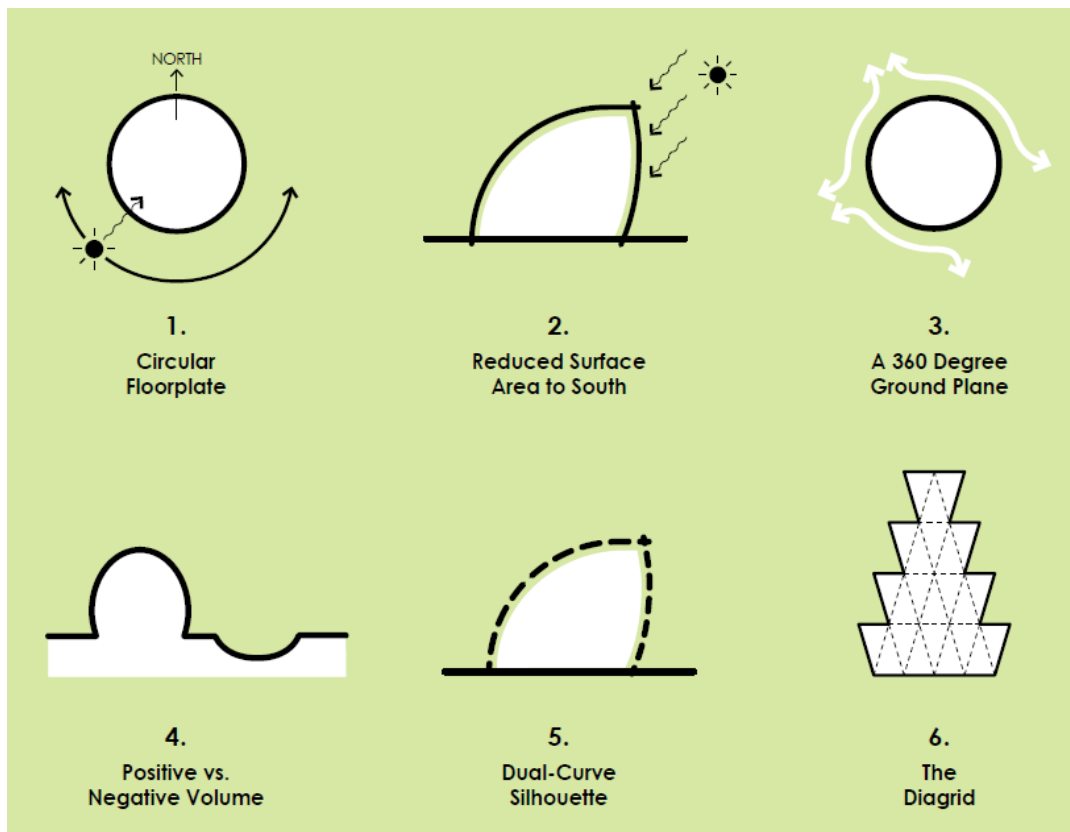


Image showing the site outland in red and the other land under the applicants ownership outlined in blue.

16. The site, was previously used as offices by the Greater London Authority (GLA) who have since relocated to the eastern part of London. The building is currently empty but tourists/ members of the public can still walk around the base of the building as well as utilise the steps of The Scoop, which sits to the west of the main building. The building to the south of the 110 Queens Walk was in operation as a cafe and also housed equipment for cleaning the office building.
17. There is a change in level and the ground slopes down from South to North. The building is also of an unusual shape and can be described as being of a bulbous appearance. It is a glazed structure and is 10 storeys in height. At the top there was an exhibition and meeting space with an open viewing deck. Internally there is a helical walkway that ascends the full 10 storeys.
18. The Scoop (located to the west of the site) is an external area that has steps down from Queen's Walk. It has previously been utilised for various different performances that have ranged from sports screenings to food to film and music productions. The building was designed by Foster and Partners as part of the More London Masterplan.
19. As referenced elsewhere in the report, this is a distinctive building and below are some of its distinctive elements:



20. The building is locally listed but it is not within a conservation area. It is however close to both the Tooley Street and Tower Bridge Conservation Areas. The site is also within Borough Open Land (BOL) as well as being next to the Metropolitan Open Land (MOL) of Potters Fields.
21. To the North is Queens Walk and the River Thames. On the opposite bank of the river, is the Tower of London which is a World Heritage Site. To the East of the site is Potters Fields (MOL) as well as Tower Bridge which is Grade I listed building.
22. To the South of the site is Potters Field park (MOL). There is also a Grade II listed Hays Galleria, Queens Walk, Cottons Centre, London Bridge City Pier and the More London Estate. Collectively these areas are known as the London Bridge City Estate.

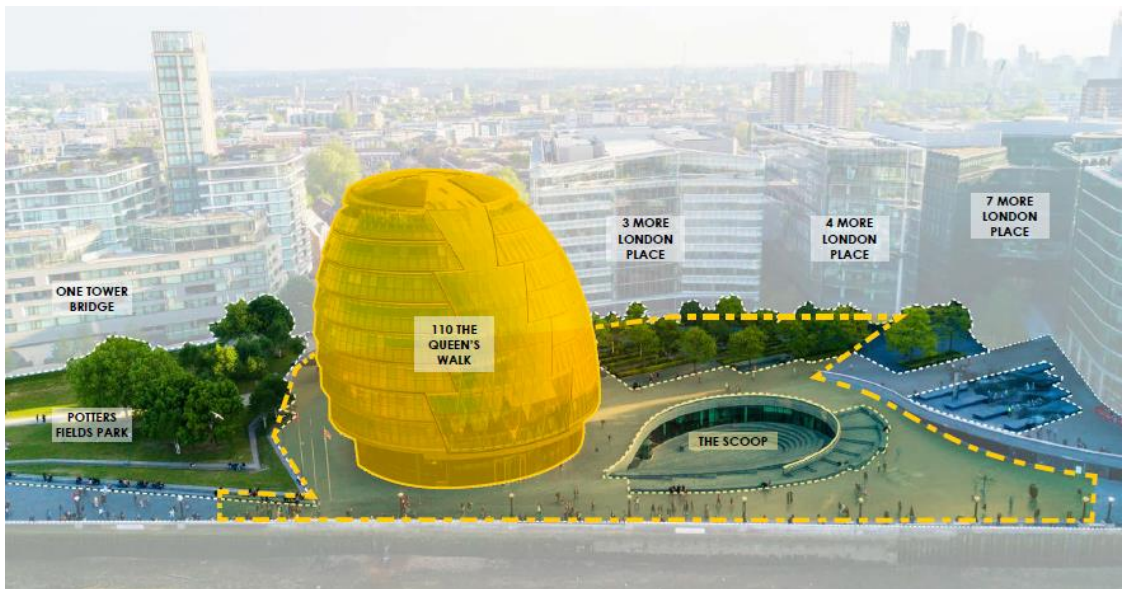
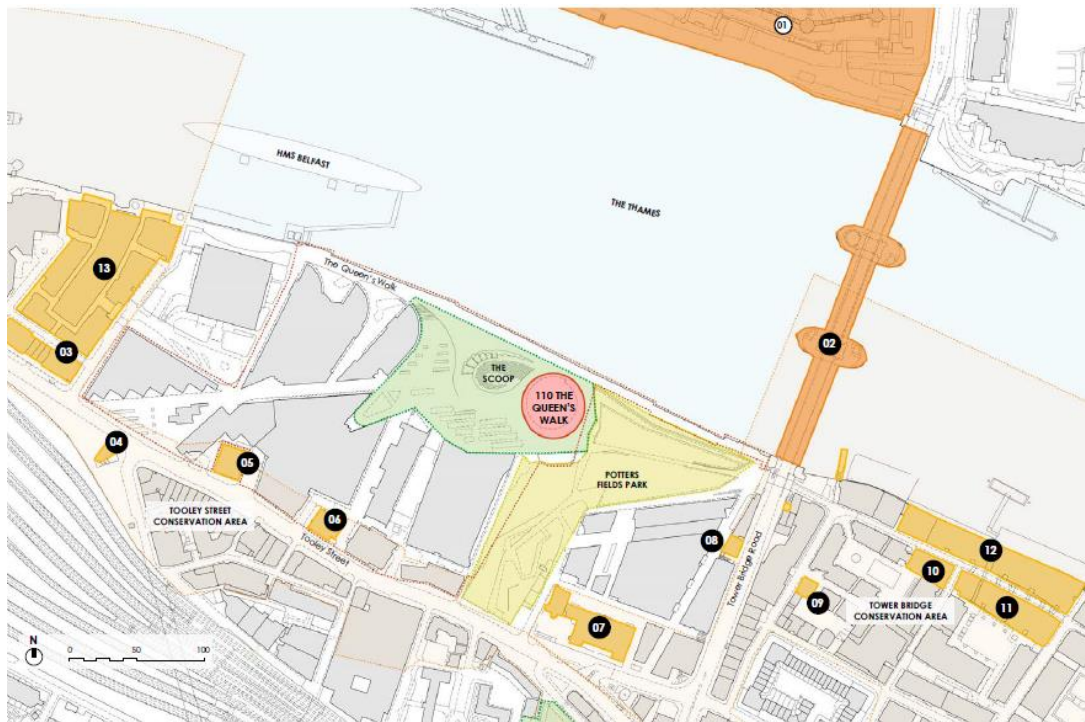


Image showing the site in relation to the surrounding properties and park.

23. The site has a PTAL rating of 6B and the building and the immediate surrounds are a major tourist destination and close to London Bridge station which is a major transport hub. There are a number of other modes of transport in close proximity. An example being a number of bus routes that go to places such as Peckham, Shoreditch and Waterloo. There are also 23 standard cycles and 2 e-bike stands to the South.
24. This image below is without the highlighted areas and shows 110 The Queens Walk (centre) with More London Estate to the rear/ to the right and the mixed use and residential development (One Tower Bridge) to the left.



25. Map showing the site in relation to surrounding heritage assets:

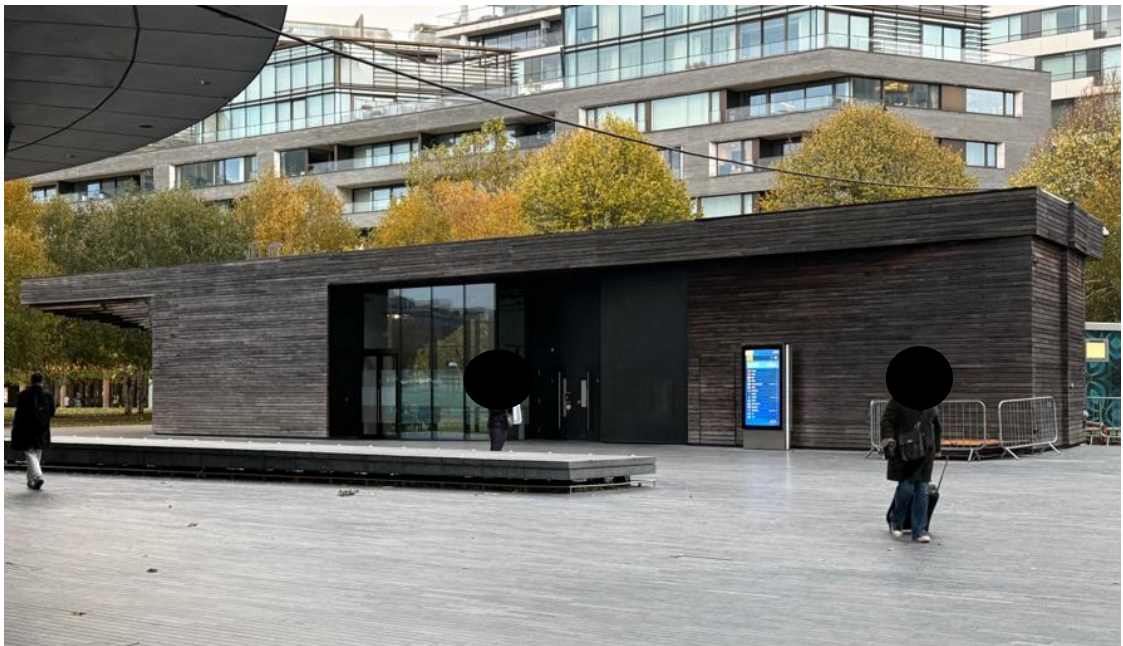


Legend

- | | |
|-------------|-------------------------------------|
| 1 | Tower of London |
| 2 | Tower Bridge |
| 3 | The Counting house |
| 4 | Shipwrights Arms public house |
| 5 | 115 Tooley Street |
| 6 | 112 Tooley Street |
| 7 | South London College |
| 8 | Bridgmaster's House |
| 9 | The Anchor Tap public house |
| 10 | Eagle Wharf |
| 11 | The Cardamon building |
| 12 | Butler's Wharf building |
| 13 | Hay's Galleria |
| | Estate Boundary |
| — | Building Boundary |
| Orange | Grade I Listed Buildings |
| Yellow | Grade II Listed Buildings |
| Green | Open Space - Borough Open Land |
| Light Green | Open Space - Metropolitan Open Land |



View of south elevation from Potters Field Park



View of the garage that is to be removed as part of the application



View of western elevation and the footpath in front of the site.



View of the site and the temporary Christmas market.

Site designations

26. The site is subject to the following designations in the adopted Development

Plan:

- Bankside, Borough and London Bridge Opportunity Area;
- Bankside and Borough District Town Centre;
- Borough Open Land (BOL);
- Strategic cultural area;
- Central Activities Zone;
- Archaeological Priority Zone;
- Air Quality Management Area;

27. In addition, there are a number of protected views that the site is within:

Protected vista 6A.1 – Blackheath Point to St Paul’s Cathedral,
Protected Vista 4A.1 – Primrose Hill summit to St Paul’s Cathedral,
There are also other designated views such as Tower Bridge and a townscape view (Queens Walk to Tower of London).

28. The assessment against this policy has been expanded upon later in the report.

Planning history:

29. The building was originally granted planning permission under planning permission 99/AP/1000. This was granted consent on 19.01.2000 for:

Construction of 9 storey headquarters building for the Greater London Authority with ancillary servicing, parking, hard and soft landscaping, and other incidental works to the development of the application site.

As referenced above, the site was occupied by the GLA until it moved headquarters in March 2022.

30. A number of applications have also been submitted/ determined with regards the area adjacent the site. For instance, 23/AP/2779 was granted consent for:

“The annual erection and installation of circa 65 wooden cabins across the London Bridge City estate for the Christmas market event from November 1st to January 7th. The development is comprised of 6 Zones of cabins across the London Bridge City estate and along Queen’s Walk including; Zone 1 - Riverside/The Scoop, Zone 2 - Riverside/Tavolino Steps, Zone 3 - Riverside/HMS Belfast, Zone 4 - Riverside/Upper Deck bar (by HMS Belfast), Zone 5 - Riverside/Southwark Crown Court and Zone 6 - Hay’s Galleria. The cabins will measure 10x8ft, 10x6ft, 10x5ft, 10x4ft and 20x10ft, respectively. There will be a range of items on offer including hot and cold beverages/food, arts & crafts and general goods. The event will also see two pop-up bars, one at the top of The Scoop on the riverside and one at London Bridge City Pier at the back of Cottons Centre.”

31. These cabins are erected annually on a temporary basis. This would need to be considered when determining items such as the access to The Scoop. If the erection of these structures is not to continue in the future, then this should be referenced in supporting documentation. If they are to continue, reference should then be made to the siting of these structures to show that they have

been taken into account.

32. A planning application has just been submitted to replace the existing water fountain immediately adjacent/ to the West of 110 Queens Walk. The scheme would also include hard and soft landscaping works within this area. This was made valid on 07 November 2024 and is currently pending consideration.

Details of proposal

33. This application seeks full planning permission to partially demolish and alter the existing office building in terms of footprint, design and usage. For instance, there would be an increase in depth from approximately 41.9m to approximately 56.1m. This is an increase of 14.2m.
34. The scheme would also increase in height of the building from 49.8m to 50.4m. This is an increase of 0.6m. The majority of the structure would remain as offices but there would be an introduction of commercial units on the ground floor as well as within The Scoop.
35. What is currently in place (Net Internal Area/Gross Internal Area/Gross External Area):

Existing	NIA (sqm)	GIA (sqm)	GEA (sqm)
Office	9,899.80	18,165.90	18,975.30
Retail (Class E)	60.7	61.6	61.9
Total	9,960.50	18,227.50	19,037.20

What is being proposed:

Proposed	NIA (sqm)	GIA (sqm)	GEA (sqm)
Office	10,530	18,618	19,555.30
Flexible commercial (Class E)	2,436	3,380	3,605.70
Total	12,966.00	21,998.00	23,161.00

The difference between existing and proposed:

	NIA (sqm)	GIA (sqm)	GEA (sqm)
Office	630	452.1	580.00
Retail/commercial	2,375	3,318	3,543.80
Total	3,005.50	3,770.50	4,123.80

This shows that there would be an increase in NIA, GIA and GEA of the offices as well as the commercial units.

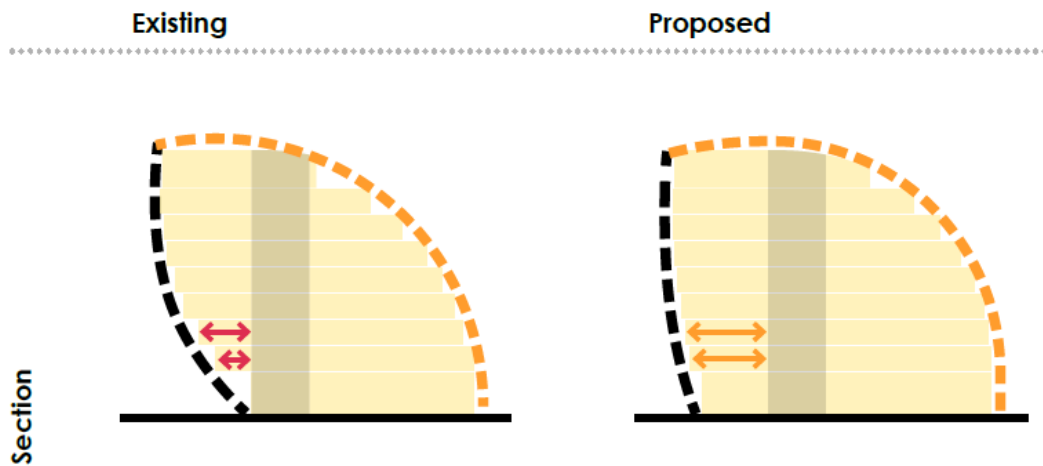
36. As referenced above, the proposed development would alter the design of the existing building and The Scoop area. This would alter items such as the 'diagrid' as well as introducing banding and the greening of the building. The proposed development would also alter and amend the existing landscaping. This would introduce items such as lifts into The Scoop as well as areas of soft

landscaping and seating.

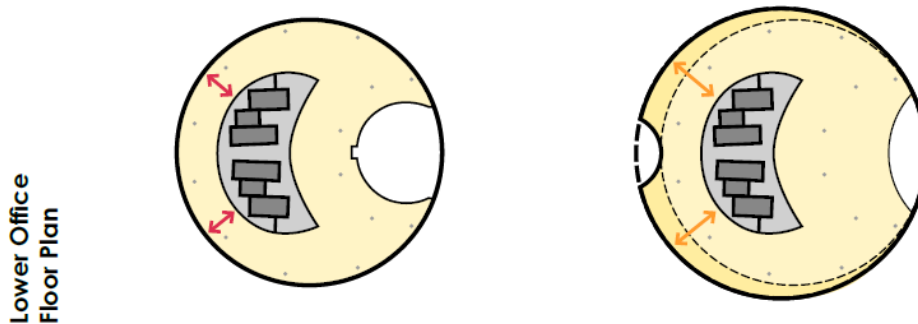
- 37. A development of this size and with the proposed employment densities would be expected to deliver 30 sustained jobs for unemployed Southwark Residents at the end phase or meet any shortfall through the Employment in the End Use Shortfall Contribution. This can be secured via legal agreement.
- 38. There would be an increase of 145 jobs and this is highlighted in the table below:

	Existing	Proposed	Difference
Jobs	828	973	+145

- 39. Images and photos of the proposed development:



This shows the existing (left) and proposed (right) sectional plans which highlight the increase in floor area as well as the slight change in curvature.



- 40. This also highlights the increase in depth of the building (existing on left and proposed on right).



Both images are of the proposed building and highlight the changes when viewed from the riverwalk. It also shows the proposed landscaping and lighting that is being proposed.



Proposed north elevation and showing the distinctive design of the diagrid:



Proposed south elevation



This shows the changes to The Scoop as well as the proposed landscaping on the site. For the avoidance of doubt, the area to the bottom right that is hardlandscaping is outside of the site.



① Metallic finishes with blue/green tone



Blue/Green Tone

Reflectivity

Texture

② Dark Grey Metallic Framed Window Units



Vertical Aspect

Dark Grey Finishes

③ Satin Metallic 'Bullnose' Trim



Panelisation

Satin Grey Metallic Finish

④ Biodiversity

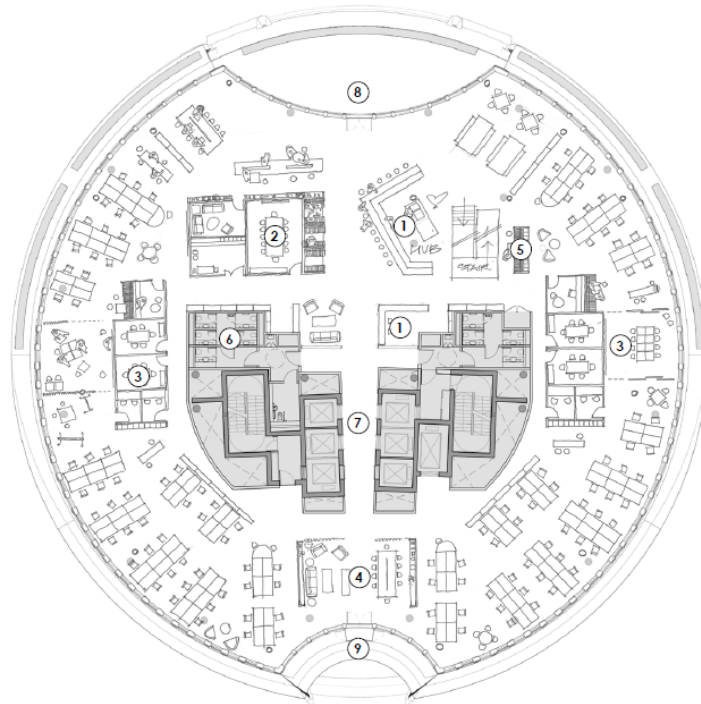


Integration into Bullnose

Evergreen Shrubs

Robust Grasses

This shows the detailing on the building as well as some of the proposed planting.



'Open Plan' Layout



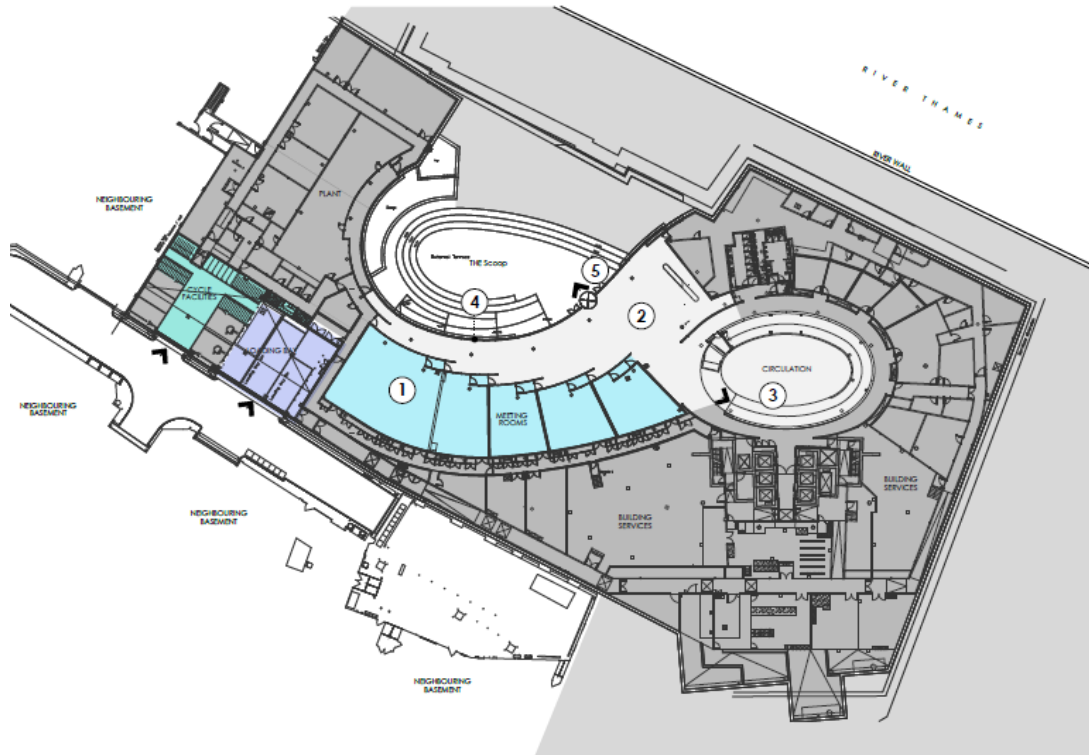
'Cellular' Layout



'Innovation' Layout

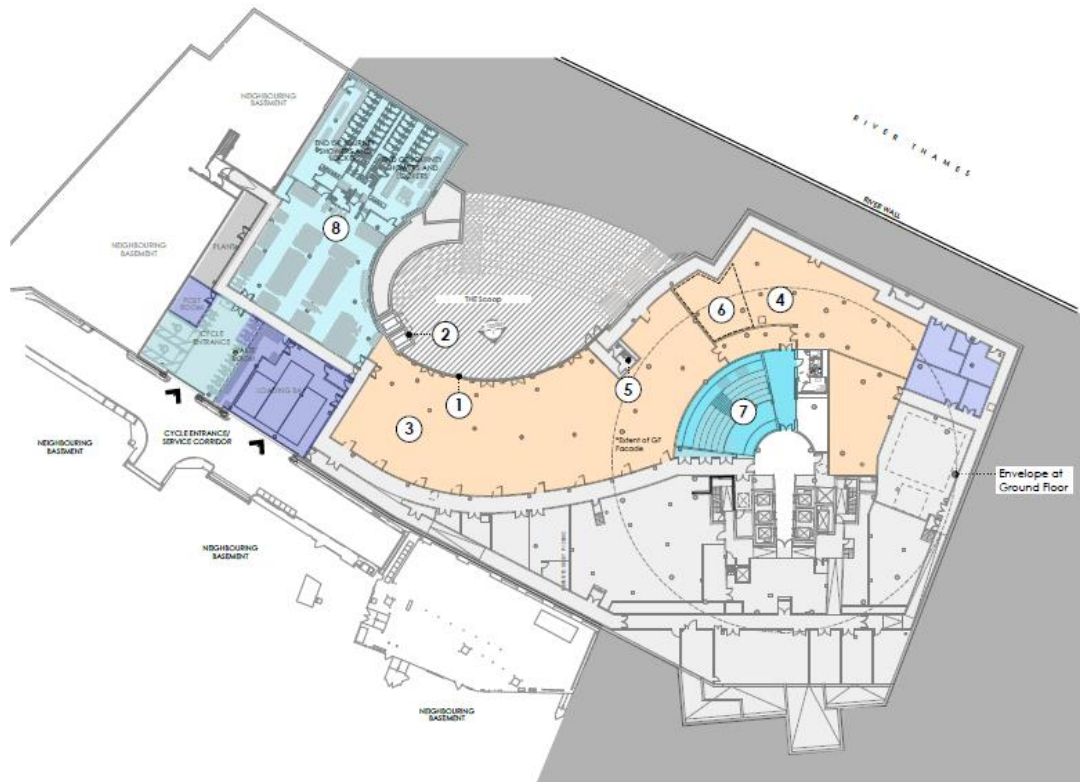
These images show the possible layout of the office space.

41. The following images show the existing and proposed lower ground floor plan and highlight the proposed changes to this area:
42. *Existing:*



- Employment Space
- Cycle Facilities
- Building Services / BOH
- Circulation
- FM Facilities

43. Proposed:



- F&B / Retail
- End of Journey Facilities
- Office Ancillary
- Plant / BOH
- FM facilities

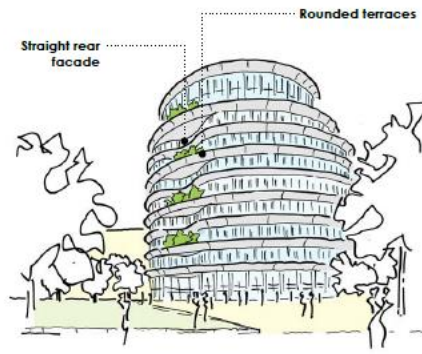
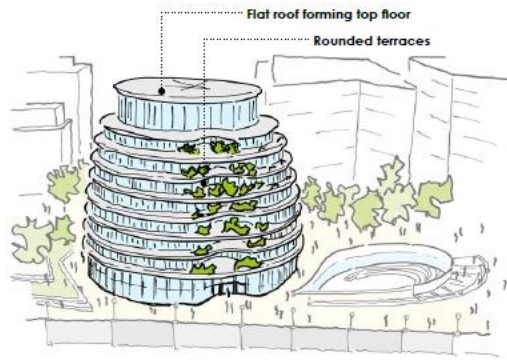
Amendments

44. Updated information has been received including changes to the cycle parking and the boundary of the site and Potters Field Park. Further justification concerning the design has also been received along with information on flood defences and Biodiversity Net Gain (BNG)

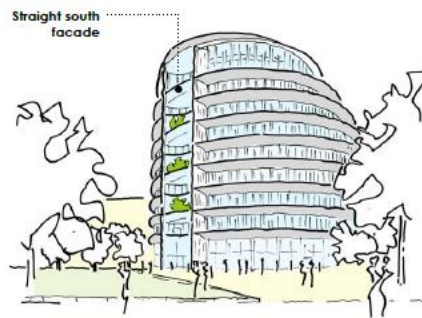
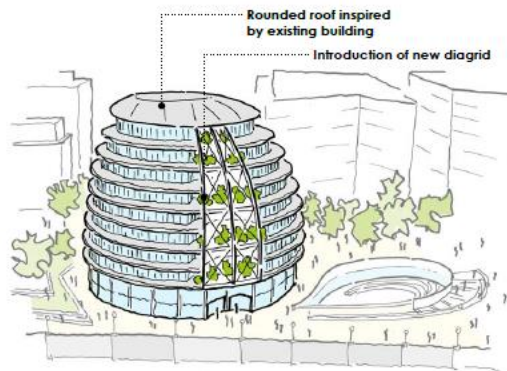
Pre-application

45. As referenced in the submitted Design and Access Statement (DAS), this scheme has been through numerous rounds of pre-application advice and the design and overall design and appearance has altered throughout. The stages and evolution of the design are visible in the following images:

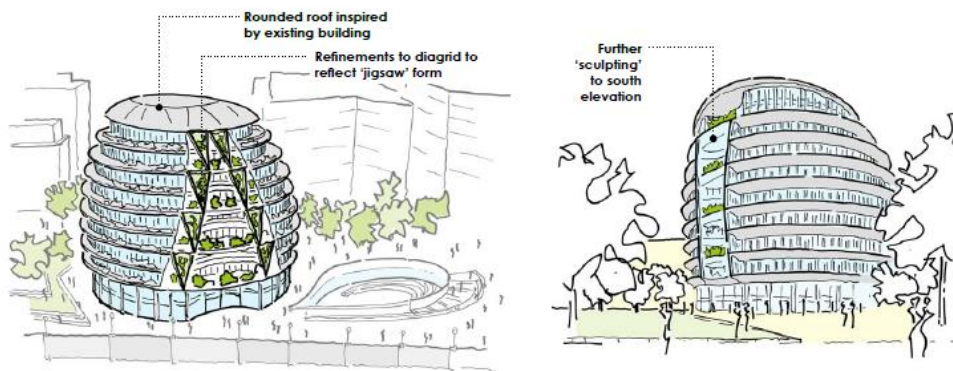
Pre-Application 1 (21.06.23)



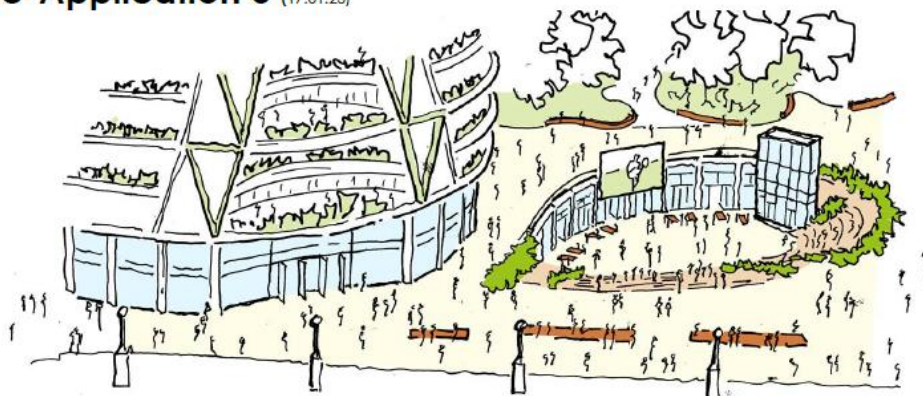
Pre-Application 2 (09.08.23)



Pre-Application 4 (09.11.23)



Pre-Application 5 (17.01.23)



46. The above show the progression of the scheme and how it has altered since the first meeting and throughout the process. For instance, the shape and curvature of the building have altered as have the appearance of The Scoop. The features on the existing building, as referenced elsewhere in the report, were considered as was the impact upon the character and appearance of the site as well as the setting, including the impact upon heritage assets such as Tower Bridge and the Tower of London. This has been expanded upon below:

KEY ISSUES FOR CONSIDERATION

Summary of main issues

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

- Environmental impact assessment
- Principle of the proposed development in terms of land use;
- Proposed usage and increase in office and commercial space
- Impact upon BOL and MOL;
- Landscaping, urban greening and biodiversity
- Designing out crime
- Pedestrian movement throughout the site
- Potters Field Park:
- Transport and highways

- Impact of proposed development on amenity of adjoining occupiers and surrounding area;
- Archaeology
- Fire safety
- Construction management
- Flood risk and Sustainable urban drainage
- Air quality
- Energy and sustainability
- BREEAM
- Wind and microclimate
- Community involvement and engagement
- Planning obligations (S.106 undertaking or agreement)
- Mayoral and borough community infrastructure levy (CIL)
- Community involvement and engagement
- Consultation responses from members of the public and local groups
- Human rights, equalities assessment and human rights

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

Legal Context

49. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise. In this instance, the development plan comprises the London Plan 2021 and the Southwark Plan 2022. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires decision-makers determining planning applications for development within Conservation Areas to pay special attention to the desirability of preserving or enhancing the character or appearance of that area. Section 66 of the Act also requires the Authority to pay special regard to the desirability of preserving listed buildings and their setting or any features of special architectural or historic interest, which they possess.
50. 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.

Environmental impact assessment

51. An Environmental Impact Assessment Screening Opinion was requested and determined under application 23/AP/3463. This was because the proposed development is more than 1 hectare (1.03 hectares). This Screening Opinion referenced items such as the impact upon Natural Resources, Waste, Pollution and Population Health. There were other items that were also referenced but the application concluded that the proposed development would not likely have any significant effects upon the environment. The officer report for this application also noted that the matters that were raised (such as air quality) could be adequately assessed through the submission of technical reports. These reports have been submitted as part of this current planning application and have been considered/ assessed later this report.

ASSESSMENT

Principle of the proposed development in terms of land use

52. The building and as well as the location in which it sits are recognised as extremely distinctive parts of the built London environment. The building is locally listed and this along with the surrounding area are readily recognisable and there are architectural elements which create this 'distinctiveness', and which contribute positively to the building. There are however 'problems' with both the existing structure and that of the surrounding area.
53. As referenced earlier in the report, the building was previously occupied by the Greater London Authority (GLA) who have since relocated. This occurred in 2021 and the building has remained unoccupied since this period. The supporting information stated that a new occupier was considered after a 'light' refurbishment but that this would not have addressed the existing and fundamental issues with the building. This has been expanded upon later in the report.

Impact upon BOL and MOL:

54. As referenced above, the site including the existing building is Borough Open Land (BOL). Potters Field as well as the grassed area to the East of the site is also Metropolitan Open Land (MOL). This space would not however be materially affected by the proposed increase in size of the building or the changes with regards landscaping.
55. The proposed increase in footprint of the existing building would be development on BOL. This however would not be resisted as in exceptional circumstances, development on BOL may be permitted where it's an extension to an existing building that does not result in disproportionate additions over and above the size of the existing building.
56. The proposed extension meets criterion two of the exceptions criteria in P57 of the Southwark Plan in that it is an extension to an existing building that is not a disproportionate addition over and above the size of the original building. The footprint of the extension would be 374 sqm. The garage building would be removed adding 257sqm of landscaped space to BOL.
57. In addition to complying with the policy requirement for development on BOL, there would be benefits to the functioning of BOL that the development would provide, this is in part the additional landscaping. The new retail units on the ground floor would also improve footfall and cause people to intentionally visit the southern part of the building. At present, this area is purely a thoroughfare and there is no reason to stop and enjoy this space. The scheme would also introduce large areas of soft landscaping and seating into an area that is currently hard landscaped. This would not only improve the visual quality of this space but it would also improve the usability of this area. As such and in this instance, the impact and intrusion onto BOL can be deemed an exceptional circumstance and can be accepted.

58. With regards the impact upon the MOL (at Potters Field), the removal of the garage would be of benefit as it would remove a physical structure between the two sites. This would be a visual improvement as it would improve the 'openness' of the space and provide a degree of continuity between the two areas. For the avoidance of doubt, the siting of the proposed extension would mean that it would not materially impact upon the MOL and as referenced above, the area between the site and Potters Field/ the MOL, would form seating and soft landscaping. The scheme would therefore be in compliance with Policy P57

Proposed usage and increase in office and commercial space

59. The proposed development would increase and alter the existing office space. It would also introduce larger areas of commercial floor space as well as providing improvements to areas such as The Scoop. These improvements have been referenced below whilst areas such as 'Design' and 'Landscaping' have their own section.

Increase in office space:

60. The site is within the Central Activities Zone (CAZ) and the Bankside, Borough and London Bridge Opportunity Area. Southwark Plan (2022) Policies ST2 (Southwark's Places) and P30 (Office and business development) encourage the provision of increased and improved office floor area.
61. As referenced above, the use of the main building would change. It was previously offices used by the GLA. The proposed usage of the main part of the building would still remain as offices but would no longer be associated with the GLA. The proposed usage of the building would therefore be similar as what is currently in place. The usage and increase can therefore be accepted.

Increase in commercial floorspace:

62. The proposed development would involve the removal of the existing garage building which was previously operating as a café/ coffee shop. This has however shut down and the building and usage would be removed as part of the proposed development. This has meant that there would be an increase in commercial floor space from 61.6 sqm to 3380 sqm. This is an increase of 3318 sqm.
63. The layout of the new commercial spaces, especially those to the ground floor of the office building have been carefully considered. An example being that the submitted statements have shown the difference between a unit that is 6m in depth and a unit that is 7m in depth unit and how the reduced depth would inhibit an active frontage whilst also providing a less usable space. This is highlighted in the image below with the 6m in depth unit shown on the left and the 7m in depth unit shown in the right.

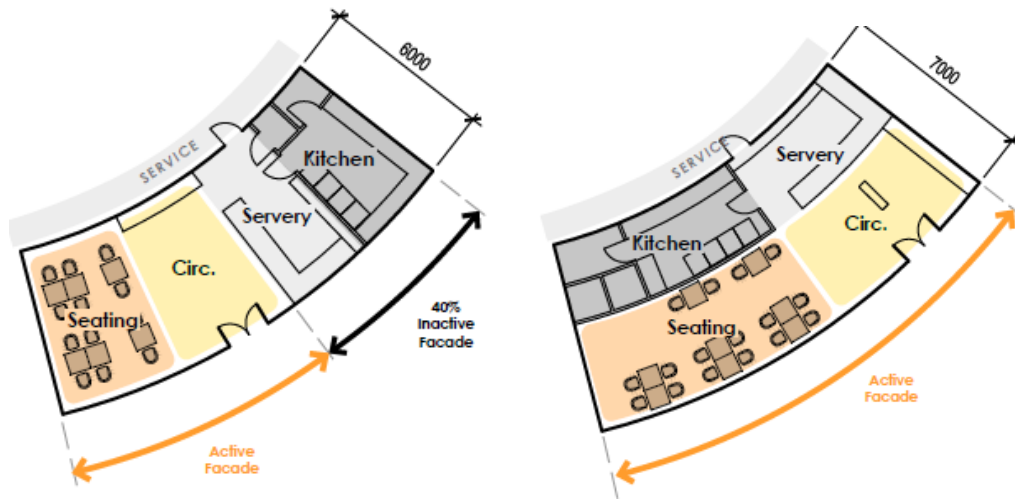


Image showing the depths of unit and how this impacts upon items such as the active frontage.

64. The proposed appearance along with the size and scale of the new units would be in keeping with the other uses in the surrounding area. The alterations would also be proportional to the size and scale of the existing building. As such, the principle of these changes could be accepted.

Changes to The Scoop and lower ground floor:

65. The proposed internal alterations to the lower ground floor would provide 3380 m² (gross) flexible commercial floorspace which would be accessed via The Scoop. This would provide a 'market hall' layout with possible food and commercial activities. This change would allow this area to become a year-round destination for both tourists as well as those living and working close to the site.
66. The possible uses of this area are shown in the following images:



Image showing the possible uses within the lower ground floor area.

67. Although the appearance and access would alter, the overall usage of The Scoop would not materially change. It is still intended to hold events such as shows and performances. There would also be a detachable screen that would replace the current set up but this would no longer require a 'scaffold' or take up a large portion of the 'event zone'. The existing and proposed set up for the screen are shown below:



Image showing the existing screen.

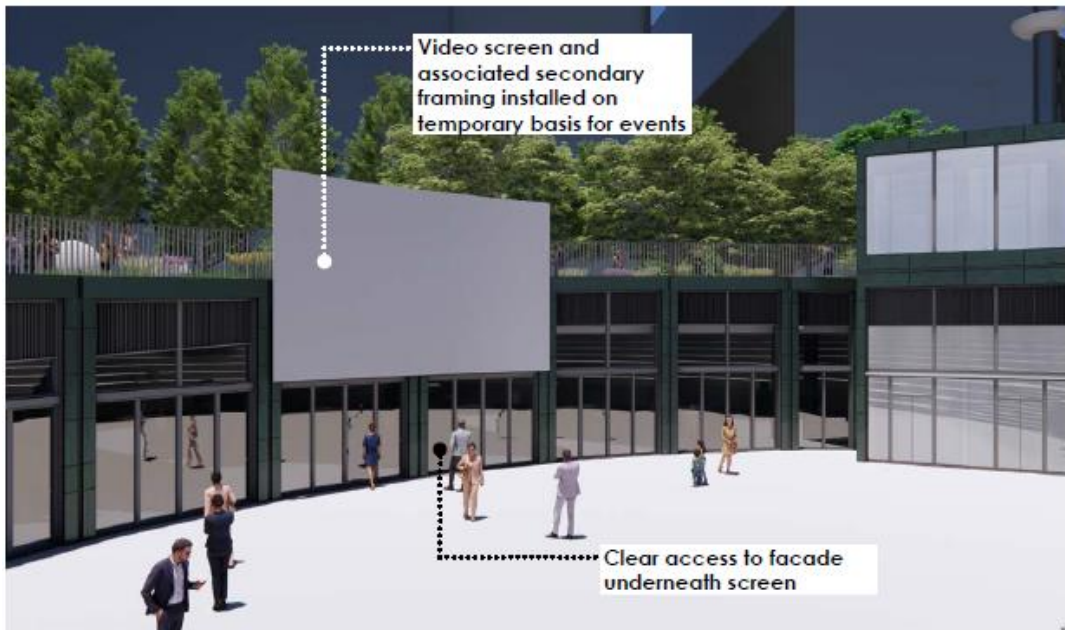
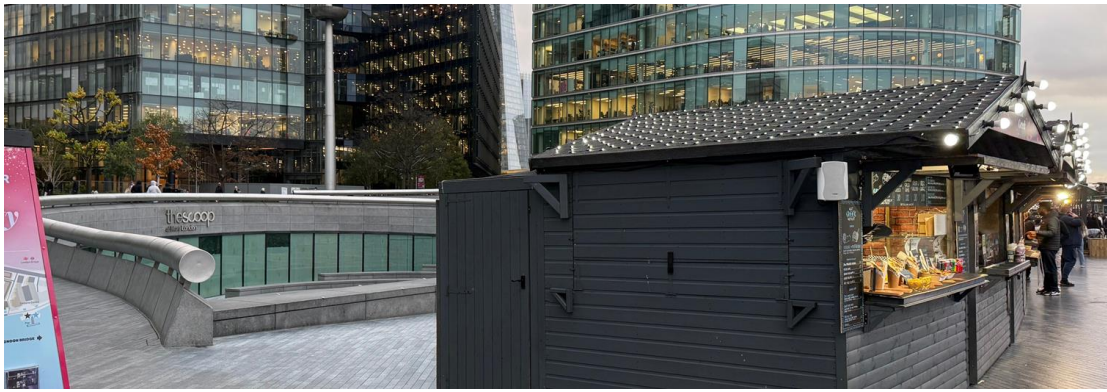


Image showing proposed screen.

68. Although there would be no material change with regards the overall usage of The Scoop, there would be physical improvements to this area. As referenced above, the existing ramp does not meet Part M guidance, due to the lack of level landings. Under AD-M2 1.13(c), level landings should be provided for each 500mm rise. Without these landings, there is nowhere 'en-route' for wheelchair users or ambulant disabled people to stop and rest before continuing to ascend or descend the gradient. Lifts are therefore being proposed as to allow uninhibited access which would be of benefit to those wishing to use either the lower ground floor or events at The Scoop.
69. The proposed changes would also improve the access to the lower ground floor whilst also improving the active frontage. At present, there is a single point of entry (to the lower ground floor) and a large area of inactive frontage. When there are no events taking place, this area can be described as grey and potentially uninviting, and this is shown in the following images. It is noted that these photos show a Christmas market but when this photo was taken (12 November 2024 – approximately 16:00 by the case officer) that The Scoop was not in use by a single occupier.



The above image shows The Scoop not being utilised. It is noted that this photo is taken from a weekday and that this area could be utilised over the weekend (when one would expect larger amount of foot traffic.) This area is also well used during the summer months.



The above image shows The Scoop and how this space currently appears.

70. The existing and proposed improvements of this space are highlighted below:

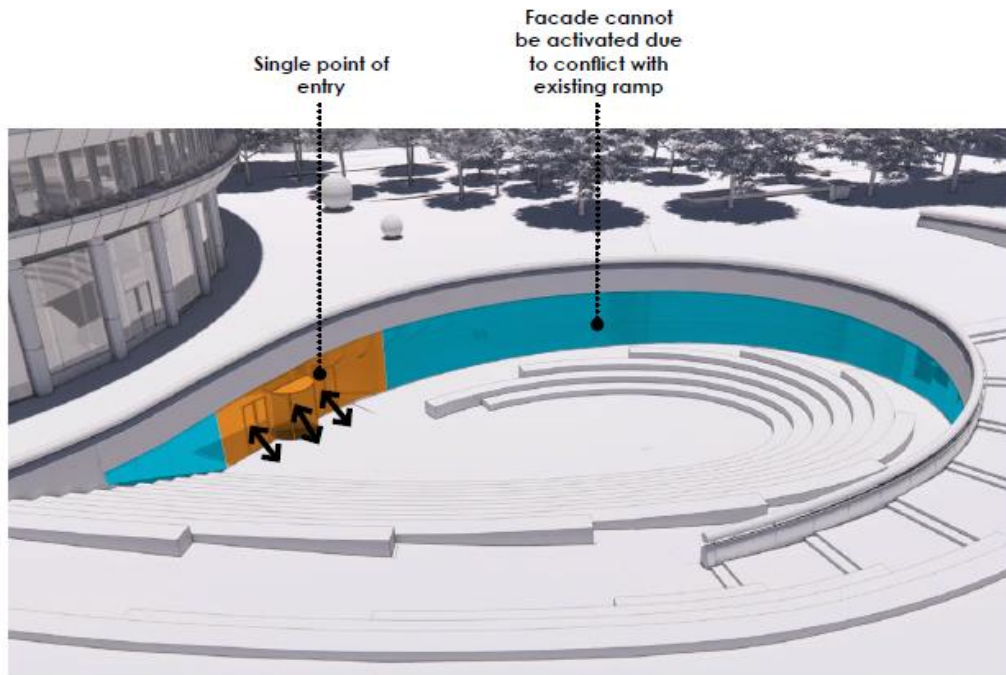


Image showing the existing 'non-conforming' access ramp and entry point into the lower level.

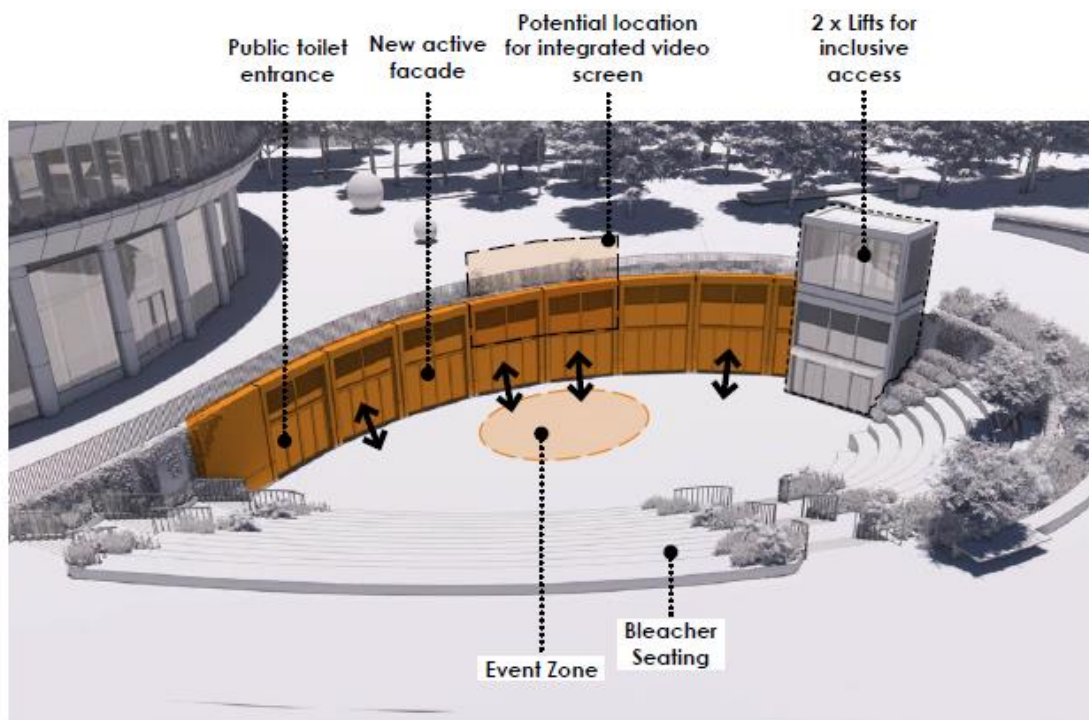


Image showing the proposed changes with the introduction of lifts, the increase in active frontage as well as soft landscaping.

71. All of the proposed changes referenced above would be beneficial. The lower ground floor was previously used as offices but these have since been removed. As shown in the above diagram, the proposed changes would reinvigorate this space. There would be a visual improvement (also expanded upon in the design section) and these improvements would mean that The Scoop could become a year-round destination for members of the public.

72. The proposed external changes (to this area) would allow a larger event zone or potentially attract more users wishing to use this improved space. This could therefore allow larger productions which be of benefit.
73. The proposed changes to this space are therefore considered a significant improvement. It could attract visitors all year round instead and the internal usage could be of benefit to both tourists and occupiers of the nearby buildings. This would however need to be controlled and the internal layout of this space confirmed. This would however be through appropriately worded conditions and with these in place, this alteration would be of benefit.

Ventilation/ means of extraction

74. It is noted that the increase in commercial space both on the ground and lower ground floor may require improved ventilation. The submitted ventilation strategy has been submitted and this has referenced the usage. For instance, the extract for possible food outlets on the ground floor would be through the building, terminating at the roof. This would use the main core riser as to not inhibit the use of the building. There would also be venting into the public realm and this could utilise a scheme similar to the current situation, where vents are located in items such as benches. There could also be extraction through items such as louvres into The Scoop. The means of ventilation has therefore been considered and would have an acceptable impact but given that the usage has not yet been fully confirmed, a ventilation strategy has been conditioned. With this in place, it would have an acceptable impact.

Provision of small shops:

75. Planning Policy P32 (of the Southwark Plan) references the requirements for developments proposing 2500 sqm (GIA) or more of retail space and how this shall provide at least 10% of this space as small shops.
76. The development would provide retail units (such as those on the ground floor) but these would have a GIA of above 80 sqm. They would therefore not be classed as 'small shops' as per the definition as set out in P32. The scheme would also provide an area with a flexible usage on the lower ground floor which would be accessed by The Scoop. When taken together, these areas would measure more than 2500 sqm (3380 sqm) but the number of units and the actual operation and layout of the 'flexible area' has not yet been confirmed. This therefore raises a question concerning compliance with regards Policy P32.
77. The submitted Planning Statement for the application has however confirmed that at least 10% of all of the proposed (commercial) units would be capable of accommodating small shops. The exact number of users would need to be identified in the future and this has been secured via conditions and a s106 legal agreement. With this in place, the scheme would be in compliance with Policy P32.

Affordable workspace:

78. Planning Policy P31 references an increase in employment floor areas and the need to provide affordable workspace. This policy is however only applicable if the increase is above 500 sqm. As shown above, the proposed development would be under this limit (452 sqm). It is also worth noting that this is not a new build development, it would partially demolish and replace. The scheme would therefore not need to provide affordable workspace.

Loss of the existing garage:

79. The existing garage previously housed items such as cleaning equipment. This is however no longer required. There was also a commercial coffee shop located in this space but this has since closed. This structure is therefore no longer needed and is to be dismantled and donated to another home. The supporting documents have referenced donating this to Southwark or another suitable beneficiary and this will form part of the legal agreement to ensure that its re-use. The loss of the garage would therefore be of benefit as this area is to be landscaped which would be a significant improvement to the public realm. As the garage building is in good condition, the potential re-use of this (outside of the site) has been referenced in the s106 legal agreement.

Christmas market:

80. As referenced elsewhere in the report, the area is used for events such as the Christmas Market (23/AP/2779). It is also noted that the proposed development and changes sought under this current application would impact upon this. An example being the soft landscaping reducing the area where the stalls could be located. The planning permission for the Christmas Market is however temporary and occurs on a yearly basis. This means that were the development (subject to this current planning application) permitted, then the planning application for the Christmas market would need to consider the impact of this permitted change.
81. Any granting of this current application would therefore not inhibit the usage of the Christmas market. The market would instead need to 'work around' the proposed changes subject to this application.

Design and heritage:

Changes to the existing building

82. The supporting information has stated that the building was initially recognised as an exemplar of sustainability and high-tech design but many of these features were not able to stand the test of time. For instance, there are issues with the existing façade system which is difficult to clean (which generally occurs via a specialist large mobile crane structure and this has meant that the windows can become increasingly dirty which then affects the operation and enjoyment of the internal space. An example being the restriction of natural light coming into the building which is evident in the following images:



These images show the existing louvre system and the view through to Tower Bridge .



Additional photos showing the louvre system and the obstructed/ compromised view towards the City of London.

83. The facade system was designed to the standards of the time and the building's current EPC Rating is D. According to the Government's Minimum Energy Efficiency Standards (MEES), it would become problematic (potentially unlawful) to let it to a new occupier from 2030 onwards, unless its EPC Rating is improved to a minimum of B. This would however require significant intervention and shows the direction of travel concerning improvements to existing buildings in terms of sustainability.
84. It is also noted that the existing design and layout (of the building) have placed restrictions with regards the usability and function of the internal space. For instance, the existing design has led to large parts of the building that have limited headroom. There are also areas that are restricted by the existing support pillars. This is evident on the upper floors and are again highlighted in the following images:

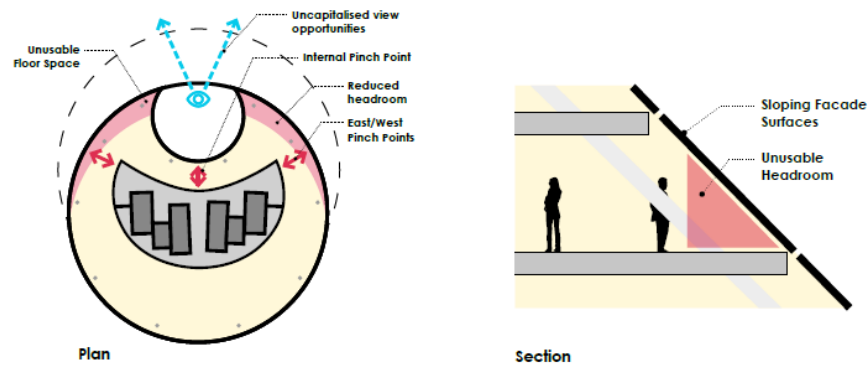


Image X: This image shows the unusable space, the existing 'pinch points' and the reduced floor to ceiling heights.

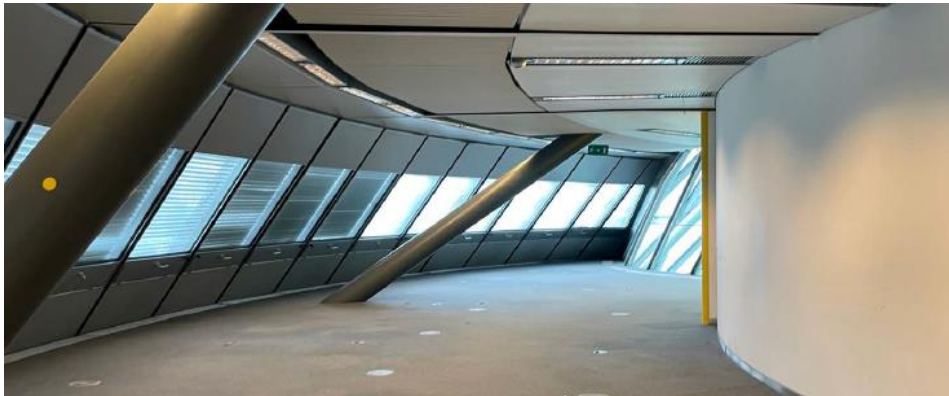


Image showing the internal layout and how items such as the support columns can restrict usage.

85. It is not only the design and layout of the upper floors that inhibit the function and usability of the building, this occurs on other levels. An example being, there is a limited width to the south of the building on the lower levels, with a distance of approximately 5m between the lift shaft and the adjacent wall. The spiral ramp, which can be noted as being a design feature, also impacts and limits the usability of the internal space.
86. With regards the external spaces, the existing soft landscaping and areas around the building are not functioning to their optimum. An example being the lack of seating and the vast swathes of hardstanding surrounding the site which has meant a lack of biodiversity. There are also issues with this space becoming an urban heat island. The large areas of dark paving create uncomfortable heat and glare in hot conditions. These spaces are therefore open for improvement.
87. There are also issues with The Scoop. The current access ramp is not compliant with Part M of the Building Regulations. There is no lift and no level landings that are a minimum 1.2m length every 0.5m rise/fall. Without these, the scheme is not considered compliant with Building Regulations legislation.
88. It is noted that this is an iconic building and is well recognised and beloved by a number of people. The above has however shown that there are a number of 'issues' with the existing design and function of both the internal and external space. These 'issues' provide an opportunity for improvement with an example

being to the sustainability of the building as well as improvements to the public realm in terms of usability and greening. The existing design is however iconic and any changes to the building would need to recognise this.

Design changes:

89. The legislation governing listed buildings and conservation areas is the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act'). Section 66 (2) of the Act requires decision makers with respect to any listed building or their setting to have special regard to the desirability of preserving the building or any features of special architectural or historic interest which it possesses. Section 72(1) of the Act requires decision makers with respect to any buildings or other land in a conservation area to pay 'special attention... to the desirability of preserving or enhancing the character or appearance of that area'.
90. With regards to the NPPF 2023, the paragraphs in Chapter 16, Conserving and enhancing the historic environment are of material consideration. In particular, para. 205 requires "great weight" to be given to the assets conservation irrespective of any harm. Para 206 requires any harm or loss should require clear and convincing justification. Para 208 advises that "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."
91. Southwark Plan policy P19 Listed buildings and structures and P20 Conservation areas requires proposals to sustain and enhance the significance of listed buildings and conservation areas and both of their settings.
92. Policy P26 requires "Development must take into account locally listed buildings and structures that positively contribute to local character and amenity".
93. Below are images showing both the existing and proposed building with regards current situation and how the building and surrounding area could appear:



Existing building, taken from Tower Bridge and Existing:



Proposed building:

94. View showing the existing building and proposed development from St Katherine's Docks.

Existing:



Proposed:



Existing and proposed views from within the Tower of London.



Existing on the left and proposed on the right:

Existing CGI from the Rill:



Proposed CGI from the Rill:



Existing and proposed views taken from Potters Field:

Existing:



Proposed:



Please note that the above image does not include any landscaping between the site and Potters Field. There would be landscaping in this view which would be controlled via condition.

Existing building and proposed views from Queens Walk

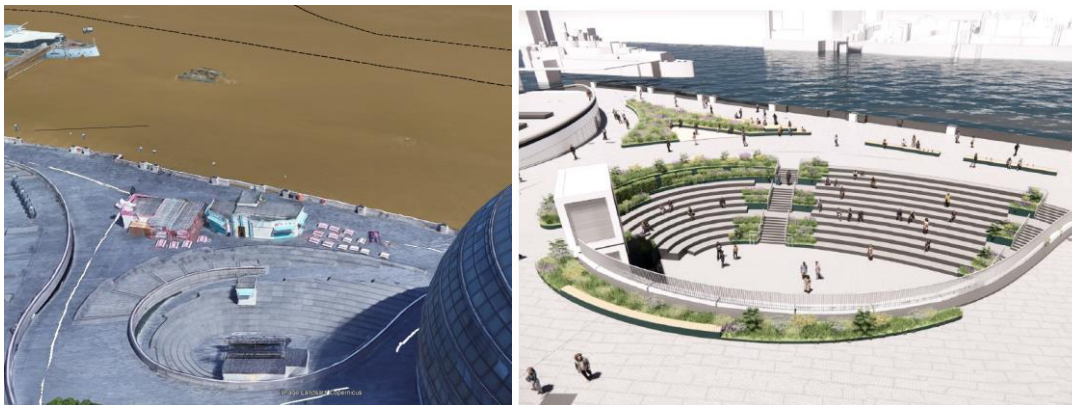
Existing:



Proposed:



Changes to The Scoop:



Existing on the left and proposed on the right. For the avoidance of doubt, the structures shown in the image on the left are only temporary and not there all year round. An example being the Christmas market referenced elsewhere in the report.

95. 110 The Queens Walk is a new addition to the local list. It was added for its contribution to the post Dockland's landscape of the late 20th century, a notable civic building designed by an internationally significance architects, Foster + Partners, using high quality iconic architecture and at the time, forward thinking technology. However the building's original function as a "town hall" has been lost (with the GLA moving to East London). The building is of a non-regular shape which means that parts of the floor plates are unusable. Some of the materials and technology are also dated and have failed to be effective in the long term.
96. The owners have previously applied for a Certificate of Immunity from statutory listing, and this was refused by Historic England. The building did not meet the

criteria for statutory listing, meaning that the status of the building in this regard has not changed. During the course of this current application (May 2024), an application was made to Historic England for the building to be listed; Historic England declined to take that application forward.

97. The building was however added to the Council's Local List. This was made after the building was nominated by members of the public, and as it met the criteria for the local list, it was added in December 2023. The Scoop also forms part of the local list as it forms part of the wider designed landscape associated with the building and the More London masterplan. It is also a publicly accessible place to entertain and gather.
98. With regards the impact on the existing structure, the proposed changes have considered the existing design and have tried to adapt and 'build on this'. The curved shape of the building and the diagrid formation facing the Thames would be still recognisable. There would also be a simple pallet of materials using similar colours to the wider More London estate which would help to anchor the building within the wider townscape.
99. The essential architectural components of the building would still be visible and this is evident in the following images:

Existing north elevation:



Proposed north elevation and showing the distinctive design of the diagrid:



100. As shown in the above images, enough of the building's original character would remain as to still mark it out as a unique piece of townscape. The loss of some parts of the bespoke Fosters' design, namely the original diagrid, stacked curved shape, glazed panels and central atrium with spiral ramp and council chamber would cause a level of harm and the removal of these items would impact upon the significance of the building (especially as a locally listed building). It would therefore, to some degree, conflict with policy P26 of the Southwark Plan (Local List).

101. With regards the level of harm that would be caused, attention is drawn to paragraph 209 of the NPPF. This references non-designated heritage assets and states:

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

102. As referenced above, parts of the existing structure would be readily visible such as the shape and the diagrid and that these would still be 'easily read'. The public benefits associated with the scheme also needs to be given weight (considered elsewhere in the report). The level of harm with regards the changes to the main building would therefore be classed as being at the lower end of less than substantial.

103. With regards to The Scoop, the landscape of this was designed for the location providing a public amphitheatre to compliment the civic use of the main building. The design (of The Scoop) relates well to the curves and materials to the wider estate buildings, although the general austere More London aesthetic of dark grey granite paving and small clipped hedges and trees is now somewhat dated. It is also an uncomfortable heat trap in the summer months.

104. What is being proposed would retain the general shape of the Scoop and it would still remain as an amphitheatre. The increase in the general floor plate (with the inclusion of the proposed market) and changes to the accessibility of this space would be of benefit as it would open this up to a wider audience. At present, the access is not compliant with Part M of the Building Regulations and what is being proposed would include a lift. As such and on balance, the proposed development would not harm the significance of the structure as a locally listed landscape. This would therefore be compliant with Policy P26 - Local list.

Setting of heritage assets:

105. Historic England: The Setting of Heritage Assets - Good Practice Advice in Planning no.3 (December 2017) has been used to formulate this response, as well as the relevant parts of the LBCA Act 1990, and Southwark Plan & London Plan policies. The following designated heritage assets are considered to be affected through change within their setting.

Tower Bridge

106. Tower Bridge is an iconic international landmark spanning the Thames approx. 200 m from the site and is a Grade 1 listed structure. At its time of construction it was the largest and most sophisticated bascule bridge ever completed. Its architectural style is Victorian gothic and it was designed by Horace Jones and constructed in 1886. Its significance is as a highly notable structure and feat of engineering and architectural design which fundamentally changed London, including the Thames and the surrounding local area extensively in the late Victorian period.
107. The setting of the Bridge includes the immediate bridge structures either side of the Thames, the river, the Tower of London, Shad Thames and the banks to the north, and Potters Fields, including the former City Hall, and the More London estate.
108. With regards to the More London estate and City Hall, over the last 100 years this area has seen huge change from the warehouses and wharfs lining the Thames, to an ecological park to the development of a city centre office and retail complex with high quality landscaping.
109. The high-quality architecture and landscape of the estate, plus Potters Field allow for Tower Bridge to be appreciated within the wider context of London. There are extensive views from within the site and the immediate surrounding area of the bridge, and a high amount of visibility from close by, through the bridge from the north bank and from within the building.
110. A particularly sensitive view which captures both the site and the bridge together is from More London Place, called The Rill. The Rill is a linear paved pedestrian route that context Tooley Street to the Thames. As Historic England have confirmed, this provides a dramatic view of the Grade 1 listed Tower Bridge, South Tower.
111. What is being proposed would affect this view and the setting of this heritage asset because the proposed changes would project in front of Tower Bridge, thus partially diminishing the monumentality of Tower Bridge from some viewpoints along The Rill.
112. The viewing experience of Tower Bridge along The Rill is kinetic which changes when walking along it. This means that the impact and visibility of the South Tower also alters and depends on where one is stood. The supporting statement has also referenced the visual experience changing with time, an example being with the seasons. In summer existing and also newly proposed street trees / planting would provide a greater degree of screening or filtering of some views towards the altered building and Tower Bridge relative to winter conditions, or with the time of day as the public realm is busier or less busy and or may be used in different ways such as temporary events. It can therefore be considered that there would be harm but this would be a low level (minor) to the significance of Tower Bridge.

Tower of London World Heritage Site and Tower of London:

113. The Tower of London WHS lies immediately opposite the northern side of the Thames from the site. The significance of the Tower of London and its setting is well documented in the UNESCO listing description as having "Outstanding Universal Value" as an "internationally famous monument and one of England's most iconic structures. William the Conqueror built the White Tower in 1066 as a demonstration of Norman power, siting it strategically on the River Thames to act as both fortress and gateway to the capital. It is the most complete example of an 11th century fortress palace remaining in Europe. A rare survival of a continuously developing ensemble of royal buildings, from the 11th to 16th centuries, the Tower of London has become one of the symbols of royalty. It also fostered the development of several of England's major State institutions, incorporating such fundamental roles as the nation's defence, its record-keeping and its coinage. It has been the setting for key historical events in European history, including the execution of three English queens." (Brief synthesis from UNESCO description).
114. What is being proposed would not substantially increase the height or general mass of the building. The scheme would also to remove from the existing cafe/garage structure thus providing better views of the Tower of London from the southern end of Potters Fields. Although a level of screening would be provided by soft landscaping between the site and Potters Field which would impact upon this view. As such and on balance, the proposals would enable some very minor enhancement of the experience of the WHS and this is compliant with P24 World Heritage Site of the Southwark Plan 2022.
115. The very minor enhancement of the experience of the WHS and this is compliant with P24 World Heritage Site of the Southwark Plan 2022.
116. In terms of the setting of the Tower of London as a listed building, this application would continue to be viewed in the backdrop of the Tower from Trinity Square area Gardens, from the northern ramp of Tower Bridge and the main entrance to the tower. All viewpoints that are within Tower Hamlets. As the height of the proposal, general architectural language and material colour pallet would remain similar to what is existing, the proposals would be viewed within the heights of the current More London development from across the river. It would have no more of an impact upon the significance of the building than that of the current City Hall. This would therefore preserve the significance of the Tower of London in line with the NPPF & P20 Listed buildings of the Southwark Plan 2022.

Impact upon Tooley Street Conservation Area

117. The Tooley Street conservation area runs from east to west along Tooley Street and includes the southside of Tooley Street opposite Potters Field, the buildings on either side of the street heading west, and Hays Galleria, Cottons Centre & the London Bridge Hospital complex, as well as the façade of London Bridge station facing north. The significance of the conservation area is as a historical key route between river crossings that in the 19th century was lined with warehouses and wharfs to the north, a warehouses and distribution offices to the south. It has strong historical visual and physical links to the Thames, which, along with the development of the railway, has shaped Tooley

Street's historic built form and spatial development. The site is visible from Tooley Street at the junction with Potters Fields, and from More London Place looking towards Tower Bridge. While the built form of the More London Estate including 110 The Queens Walk is contemporary, overall the estate forms a positive relationship with the conservation area, maintaining a generally consistent height and massing with high quality large publicly accessible spaces and landscaping in between.

118. Given the siting and relationship with the surrounding buildings there would be a very minor impact upon the significance of the Tooley Street conservation area by change within its setting limited to the view and experience along More London Place. The shape of the building and general contemporary architectural approach is comparable with what is existing (within the conservation area) and whilst the appearance would change with the slight obscuring of the south Tower of Tower Bridge, this would have a minor effect of erosion of the visual connection between the conservation area and Tower Bridge. Para 208 regarding less than substantial harm requires public benefit to be weighed in this balance, and in the case of Tooley Street conservation area, it would be acceptable and therefore compliant with this policy.

Tower Bridge Conservation Area:

119. The east side of Potters Fields, including the bridge structure and the La Lit hotel (181 Tooley Street, grade II) are within the Tower Bridge conservation area. This CA captures the Victorian formation of the bridge, and Tower Bridge Road, plus the wharfs and warehouses of Shad Thames, and the river Thames itself. The setting of the conservation area includes the eastern end of the More London estate, including 110 The Queens Walk, and the One Tower Bridge complex. These late 20th, early 21st century developments contribute neutrally to the significance of the conservation area by maintaining a consistent height (with the exception of the One Tower Bridge tower) and contemporary architectural language which does not compete with the principal historic features of the area including Tower Bridge and the Tower of London WHS. Potters Fields and the landscaping around the site provides a sensible break in the wall of development between London Bridge and Tower Bridge.
120. The proposed changes would maintain in part, this neutral impact by retaining the general height and architectural pallet of materials associated with the More London estate. As referenced above, a level of harm would occur to Tower Bridge when viewed from the Rill in More London Place. Although in relation to the wider conservation area, this would be minor.
121. For confirmation and during the course application, further justification with regards the design and the impact upon Tower Bridge was received. This drew attention to items such as the view created from the Rill being a modern occurrence and one that previously did not exist until the redevelopment of this area. It also advised that whilst the proposed development would impact upon the wider townscape setting of the landmark bridge and that the overall shape and external appearance of the main building would change, this would not be so significant as to fundamentally alter, or otherwise adversely effect, the

existing visual relationship of the building with that of Tower Bridge. This is noted and needs to be given appropriate weight.

Height, scale and massing:

122. Given the existing height (approx. 49.8m) the development would be classed as a tall building because it would be 50.4m in height and while the existing building is of similar height, only the base and core are to be retained, while the majority of the facades and external structure are proposed to be replaced. Officers consider the proposals with the exception of point 3.2 of P17 Tall buildings to "conserve and enhance designated heritage assets", (as discussed above) to be met fully.
123. The height, scale and massing would be similar to that of the existing form (of the building). There would be an increase in floor area, which would result in a larger footprint. This should however, be balanced against the impact on the landscape and the openness of the Borough Open Land, on which the building sits. The massing of the building, as a curved structure, has, over a number of pre application meetings, evolved to retain the angle of the existing curves to the north, although the overhang has been removed to the south. The result is a building form which retains the essential character of the original, whilst ensuring the longevity of use; the building should remain as a translatable reminder of the first home of the Great London Authority and Fosters' original turn of the century design intention.
124. With regard to Borough Views (P22), the views from the building towards the Tower of London would remain, and from Blackheath to St Pauls the small increase in height would unlikely impact on the significance of this view, and it would sit beneath the height threshold of the view from Primrose Hill and not impact on this parameter. The scheme would be in compliance with the GLA LVMF SPD and policy HC4. It would remain visible in the view below St Pauls from Blackheath Point. In long distances, the architecture would be similar to what is existing and therefore no further impact is recorded.

Architectural character and appearance, including materials:

125. Architecturally, the retention of the form of the diagrid to the north elevation would be an evolution of the existing structure and would be visible from the north bank of the Thames, as the original currently is. The utilisation of the diagrid for planting and as a wayfinding device for the "front door" of the building is considered acceptable, as is the addition of planting balconies and their integration into the facade plus the amphitheatre for the office lobby.
126. The material pallet of similar colours and high-quality materials including the use of green/blue ceramic materials would be similar to those used in the wider More London estate. This would help to integrate the building into the landscape and would have a similar impact on the immediate surrounding as the current aesthetic does.
127. As referenced elsewhere in the report, the increase in footprint would impact upon BOL, however the opportunities for retail and cafe uses would activate the ground floor (of the building) towards Potters Fields. The integration of

retail and F&B uses on the ground floor would be welcomed as this would assist in the wider interactivity of the building with the surrounding landscape in this prominent and busy area of the borough. The removal of the cafe/ garage structure and landscaping would also compensate for the minor impact that would be caused.

128. *The Scoop:*

The loss of the ramp would alter the existing appearance of this area but this would lead to a greater active front which would be present to the amphitheatre. Reassurances regarding the maintenance and open use, including times and security would need to be controlled and this has been done via an appropriately worded condition. The updated architecture of the Scoop, with green ceramic façade and ordered fenestration pattern, plus integrated screen is a fitting architectural solution linking the building to the facade of the Scoop to the updated architecture for 110 The Queens Walk.

129. *Landscaping:*

The application includes the wider greening of the landscape which is welcomed. The alteration of the seating areas to include more seating, would also be welcomed. Further thought and information would however be required for the landscape replacement around the area where the cafe/ garage is to be removed and this can again be addressed through an appropriately worded landscaping condition. Further information would also be required concerning ground floor and basement layout, and ground floor elevation activity to the southern parts of the building. This can again be secured by condition.

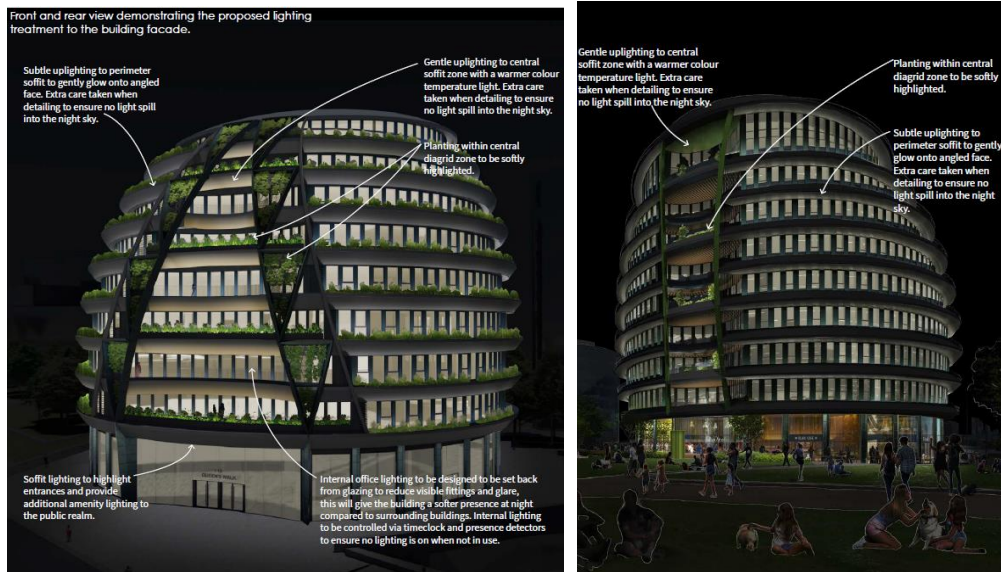
130. *Lighting:*

Given the siting and the proximity to heritage assets as well as a world heritage site, the proposed lighting both on the building as well as within the surrounding area would be of paramount importance. The submitted Design and Access Statement (DAS) has referenced the proposed lighting and the following image highlights the impact (the lighting) could have with regards distant views (red), approach views (orange) and aerial views (yellow):



Image above shows the different areas of where the lighting could be visible, both within and outside of the site.

131. The submitted Design and Access Statement (DAS) has confirmed the lighting approach and has considered the impact the development would have upon the building as well as the public realm. This is highlighted in the following images:



North elevation on right and south elevation on the left:

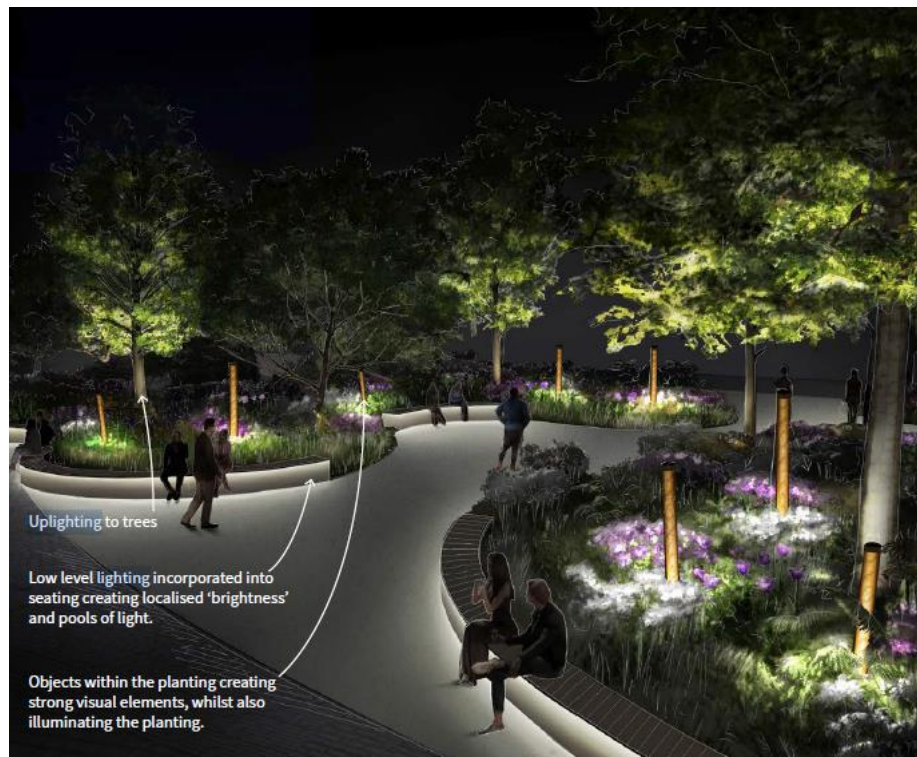


Image showing how the proposed landscape lighting and how this could provide wayfinding and good levels of illumination whilst also helping to create atmosphere and character.

132. To ensure that the both the lighting on the building and within the public realm would have an acceptable impact in terms of lux levels and also the impact

upon the character and appearance of the site and surrounding area/ impact upon heritage assets, an appropriately worded condition has been imposed.

133. In conclusion and with the exceptions above regarding the impact upon Tower Bridge and the level of harm that would be caused, the scheme would be compliant with P14, P15 of the Southwark Plan 2022. It would also be in compliance with the townscape objectives of the NPPF Chapter 12.

Landscaping, urban greening and biodiversity

Biodiversity Net Gain (BNG)

134. In England, Biodiversity Net Gain is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). This statutory framework is referred to as 'biodiversity net gain' in Planning Practice Guidance to distinguish it from other or more general biodiversity gains.
135. Planning authorities must take into account how the Biodiversity Gain Hierarchy (set out in set out in Articles 37A and 37D of the Town and Country Planning (Development Management Procedure) (England) Order 2015) has been applied and, if it has not been applied, the reason or absence of a reason when determining the application.
136. The Biodiversity Gain hierarchy sets out a list of priority actions:
- first, in relation to onsite habitats which have a medium, high and very high distinctiveness, the avoidance of adverse effects from the development and, if they cannot be avoided, the mitigation of those effects; and
 - then, in relation to all onsite habitats which are adversely affected by the development, the effect should be compensated by prioritizing the enhancement of existing onsite habitats, creation of new onsite habitats, allocation of registered offsite gains and finally the purchase of biodiversity credits.
137. On-site BNG: The draft Biodiversity Report and follow up information and emails submitted by the applicant have stated that the mandatory 10% BNG can be achieved onsite. This is in accordance with the Biodiversity Hierarchy.
138. The BNG to be provided as part of this development is considered to be significant so a s106 legal agreement will be required to secure the biodiversity gain for 30 years. A monitoring fee will be required as part of the S106 agreement to cover the cost of periodic monitoring over 30 years. A Biodiversity Net Gain Plan and Habitat and Management and Monitoring Plan will be required post-approval to set out the management arrangements. These requirements have been included as an appropriately worded condition.

Urban Greening Factor (UGF)

139. At present the majority of the site is covered in hard landscaping. It is noted that there is a small area to the south that is populated with trees and soft landscaping but the majority is covered in paving. The proposed changes would introduce large areas of soft landscaping and the UGF score would be 0.206 and under the 0.3 suggested for commercial development.
140. The supporting information has stated that the 0.3 requirement is not achievable for the site. This is because it is necessary to keep a large amount of the public realm clear of all obstructions including planters / trees, for the following reasons:
- The high levels of footfall experienced across the site and requirements to maintain acceptable TfL 'Pedestrian Comfort Level' gradings in accordance with Transport for London guidance.
 - The presence of fire tender route through the site, and Environment Agency river wall access requirements.
 - The Scoop would continue to function as an amphitheatre space which limits greening opportunities.

Attention also needs to be drawn to the shape of the existing building as this prohibits items such as the greening of the roof. For the avoidance of doubt, this was explored during the pre-application process but was not considered feasible. It is also worth the benefits that the proposed changes would bring (expanded upon below).

141. As referenced elsewhere in the report, the proposed development would alter the landscaping on the site. There are currently large areas of hard landscaping and the proposed development seeks to improve this. This is highlighted in the following images with the existing situation on the left and proposed on the right.



Images above showing the changes in landscaping between the current situation (left) and the proposed changes (right).

142. The existing trees and landscaping to the south of the site would remain but there would be new landscaping to the north-west corner. The area where the current garage building is located (to the south) would also become an area of soft landscaping. As evident in the above images, there is limited space for

new soft landscaping within the site and the proposed development has maximised what is possible and this would be of significant benefit. The supporting information has confirmed that there would be a 104% increase in planting on the site which indicates the proposed improvement to the area.

Public toilets and bins

143. There are currently two general waste bins and two mixed recycling bins. The current provision does not cater for increased footfall around summer holidays. As such, temporary bins are provided by the estate management and emptied daily. With regards to toilets, there are currently two separate, unisex, publicly accessible WCs which are located in the existing garage/ kiosk structure. Additional seasonal 'portaloo' structure used during busy periods and events.
144. It is noted that there are issues with the location of the existing toilets and these have been subject to being vandalised and have been out of commission for prolonged periods. It is also noted that toilets are an important feature especially given the number of people visiting the site and the immediate surrounding area.
145. During the course of the application, further information was received regarding both bins and toilets. This confirmed that there would be three waste bins and a three recycling bins for the site, an increase of two. Two public toilets would also be provided, accessed from The Scoop, retaining this public amenity.
146. There would also be toilets in the internal lower ground floor flexible retail space. These would be accessible for the users of the internal space. This would therefore mean that there is an increase in the number of facilities on the site but to ensure adequate toilet provision, this has been referenced in the proposed landscaping condition.

Designing out crime

147. The Metropolitan Police Designing Out Crime Officer has reviewed the submission, confirming that there have been discussions with the applicant's team on design requirements and recommendations for this development. Their response confirms that the development has considered the opportunity for natural surveillance and incorporates excellent lines of sight. A planning condition is therefore recommended to require Secured By Design security measures to be implemented and to seek accreditation for this.

Pedestrian movement throughout the site

148. Planning policy P51 of the Southwark Plan as well as Policy D8 of the London Plan reference walking and items such as desire lines throughout a site. These policies seek to enhance footpaths and routes through an area. It states that these should be convenient and accessible.
149. As referenced throughout this report, the site as well as the surrounding area is a major tourist destination. It attracts visitors who wish to look across the river towards the Tower of London and Tower Bridge. The building itself is also

readily recognisable and attracts tourists in its own right. It is however not only tourists that utilise this space. A number of commuters and other members of the public access this area. The proposed changes (with the increase in footprint as well as the introduction of soft landscaping) could reasonably impact upon the usage. This application therefore carried out a movement assessment (by Space Syntax) and this assessed and quantified pedestrian movement in terms of number and routes. It has also considered the quality of the public realm and the 'Pedestrian Comfort Level' grading as per TFL recommendations for different types of public space. This is shown in the following images:

150. Pedestrian Comfort Level Assessment - Existing

Location	Street width (m)		Movement (pph)		PCL (ppmm)		PCL	
	Total Width	Effective Width	Weekday PM peak	Weekend PM peak	Weekday PM peak	Weekend PM peak	Weekday PM peak	Weekend PM peak
1	5.9	5.5	2,085	3,357	6	10	A-	B+
2	10.1	9.7	381	408	1	1	A+	A+
3	12.4	11.7	1,755	1,659	3	2	A	A+
4	19.4	19.0	1,755	1,659	2	1	A+	A+
5	15.7	15.3	1,512	1,566	2	2	A+	A+
6	18.8	14.6	1,341	1,461	2	2	A+	A+
7	13.0	12.3	612	1,053	1	1	A+	A+
8	9.2	8.8	477	891	1	2	A+	A+
9	5.7	5.0	381	408	1	1	A+	A+



Image showing existing pedestrian comfort level (PCL).

Pedestrian Comfort Level Assessment - Proposed

Location	Street width (m)		Movement (pph)		PCL (ppmm)		PCL	
	Total Width	Effective Width	Weekday PM peak with 110 TQW	Weekend PM peak	Weekday PM peak with 110 TQW	Weekend PM peak	Weekday PM peak with 110 TQW	Weekend PM peak
1	9.0	8.3	2,700	4,050	5	8	A	A-
2	5.7	5.3	400	350	1	1	A+	A+
3	6.5	6.1	2,400	1,800	7	5	A-	A
4	10.5	9.5	2,400	1,800	4	3	A	A
5	9.0	8.6	1,850	1,800	4	3	A	A
6	13.5	12.8	1,550	1,650	2	2	A+	A+
7	5.6	4.9	850	1,250	3	4	A	A
8	5.6	5.2	900	950	3	3	A	A
9	11.4	10.7	500	500	1	1	A+	A+
10	8.60	7.9	2,700	4,050	6	9	A-	B+



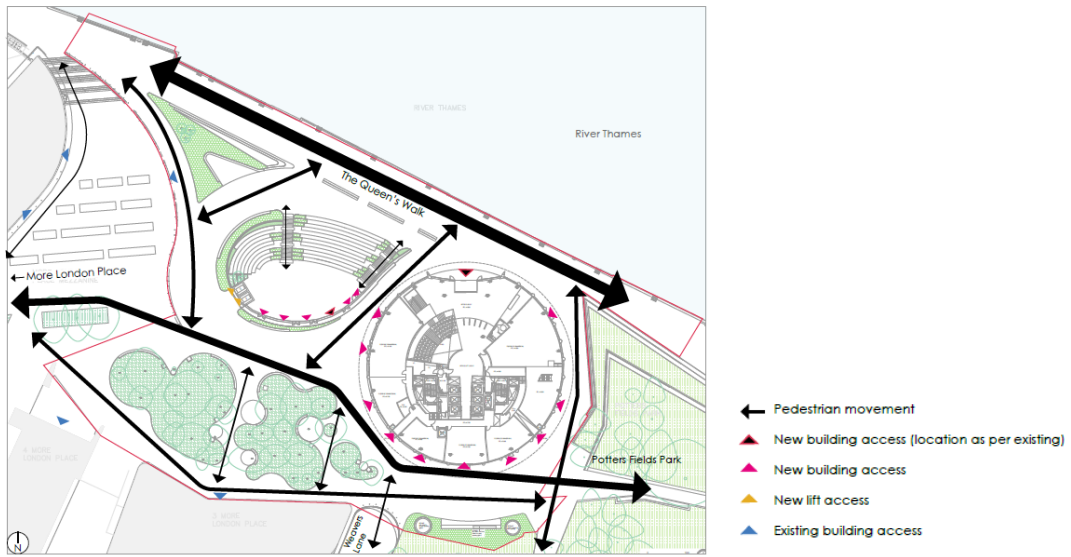
Above image showing proposed pedestrian comfort level (PCL).

151. The existing situation provides a good level of pedestrian comfort and that in certain areas, that this level would be reduced. An example being that the footpath at location '4' would go from a comfort level 'A+' to an 'A' which can be associated with the reduction in width from 19.4m to 10.5m. These would however still be in compliance with TFL's recommended levels for tourist attractions and this is highlighted below. The majority of routes and spaces fall would within the 'A' category aside from one, which would score a B+ (route 10).



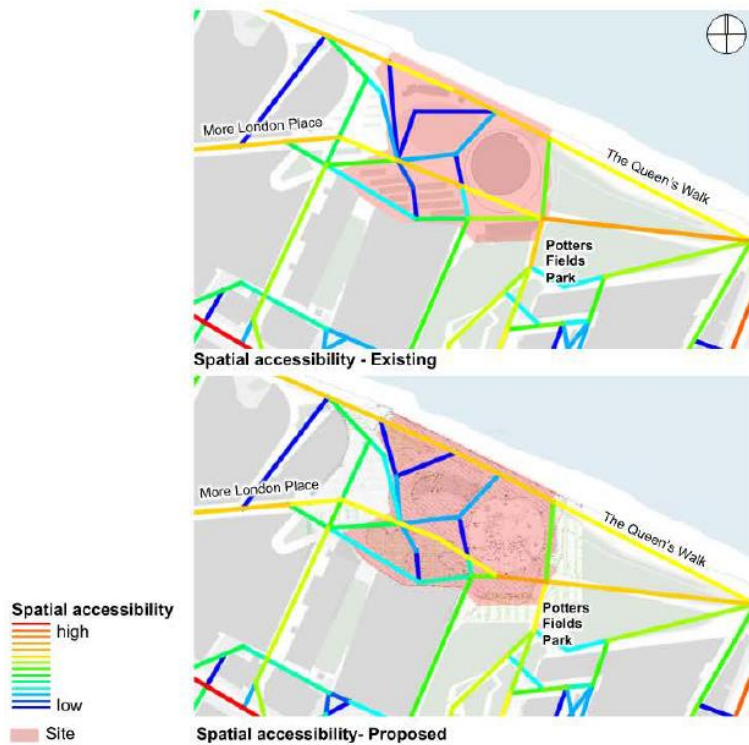
Above image – Existing situation on the left, proposed on the right and how this would relate to pedestrian comfort level and TfL recommendations

152. Key pedestrian movements throughout the site would also be maintained and this is highlighted in the following image:



The above image shows the proposed pedestrian movement throughout the site. It is noted that there would be a narrowing of the footpath of the eastern part of the building (referenced as number 7 in the above images). This is however a secondary route and there would still be a number of other alternate access routes throughout the site. It would also still achieve an 'A' in the above grading.

153. The existing impact as well as the impact of the proposed changes on spatial accessibility are also highlighted below:



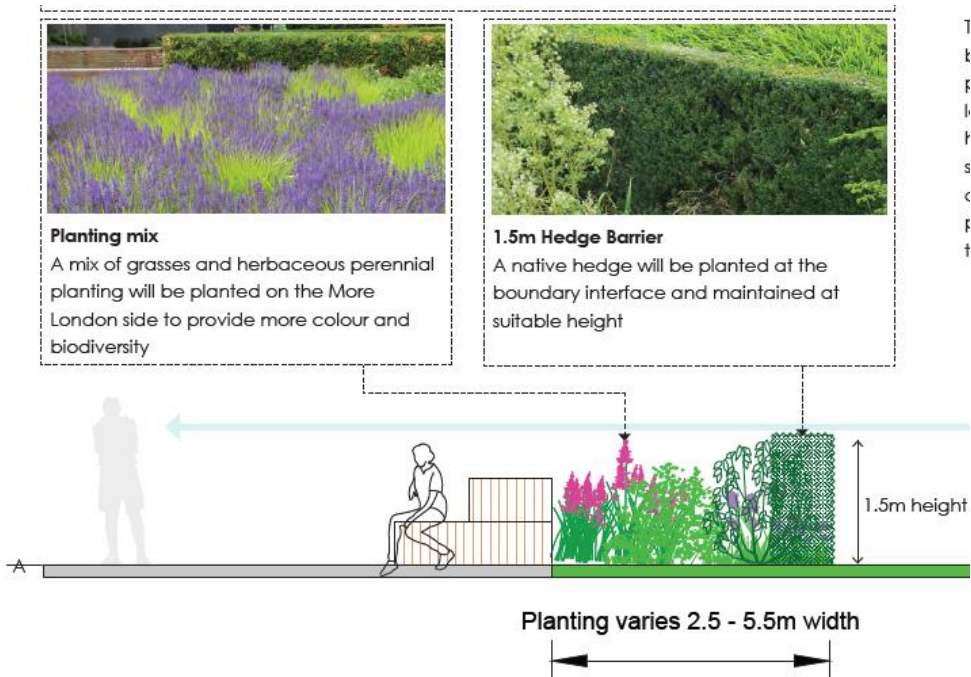
This image shows the spatial accessibility of the site.

154. The above images have shown that the main access routes throughout the site as well as key desire lines would be maintained. The scheme would also not materially inhibit access either next to the river or across the site. It would still allow visitors enough space to stand next to the Thames and take photos of the world heritage site (the Tower of London) as well as provide a means of access to walk to Tower Bridge but would now provide additional areas of soft landscaping and also areas to sit. As such, these changes would visually be an improvement whilst still provide a good level of permeability throughout the site. It would therefore not cause material harm in terms of pedestrian movement or comfort.
155. This report has already drawn attention to the various temporary structures that are erected throughout the course of the year. It is noted that the proposed changes sought under this planning application would be beneficial but as shown above, that they would also increase pedestrian flow. Any future planning application for temporary structures would therefore need to account for the changes sought under this application and would need to consider items such as siting and pedestrian through routes. The impact of these would not be considered under this current application.

Potters Field Park

156. Given the siting and relationship with the site, the impact upon this adjacent park needs to be reviewed and considered. During the course of the application, access to as well as the boundary treatment into Potters Field Park was amended. Meetings were held on site between the applicant and members of the Potters Field Trust and appropriate solutions discussed. Various options as to stop the southern boundary (where the existing garage is located) from becoming a thoroughfare were considered and a hedge and planting were deemed the most appropriate option.

157. The suggested treatments are highlighted in the image below:



158. The above image shows that there would be planting along this boundary which visually, would be an attractive feature whilst also preventing and inhibiting 'desire lines'. The bench and proposed planting should therefore mean that users would still utilise the footpaths into and out of Potters Field Park. This would therefore still maintain the visual appearance and usability of this space.

Transport and highways

159. The site has a PTAL rating on 6b (excellent) and is located within a Controlled Parking Zone (CPZ) which operates between the hours of 08:00 – 18:30 Monday to Saturday. The site is located within the More London estate. All servicing and deliveries to the More London estate are accommodated within a basement, accessed from Braidwood Street, which in turn is accessed from Tooley Street (A200). Tooley Street is a classified A-road, which forms part of the transport for London Road Network (TLRN).

Vehicular access

160. Vehicular access to the More London estate basement is provided from Braidwood Street, which in turn is accessed from Tooley Street (A200), which forms part of the TLRN. The trip generation assessment included in the submitted TA indicates that the proposed development would result in a net increase of 3,244 daily trips. The proposed development would generate a significant net increase in cycling trips and delivery and servicing trips, all of which would be required to utilise the Tooley Street access.

161. During the course of the application, further information was received which confirmed that the building is accessed via the existing More London Estate basement and that this is located some distance from the adopted highway. The junction layout was designed to accommodate a range of vehicle sizes given servicing operations are undertaken underground beneath the Estate.

Trip generation

162. The Transport Assessment report includes a trip generation assessment of the existing and proposed land uses. The extant trip generation is based on a TRICS survey of the site when occupied, whilst the proposed development trips have been calculated using the trip rates associated with the nearby Beckett House (ref: 20/AP/0944) application. The use of these trip rates is appropriate and accepted.
163. During the course of the application, further information was received. This confirmed items such as a sensitivity test being conducted based upon the latest available (2022) Department for Transport data (TSGB0109) summarising the usual method of travel to work by region of workplace in Central London. This was considered by the Council's Highways Officer and when coupled with the initial Transport Assessment, is considered appropriate and would have an acceptable impact.

Delivery and servicing

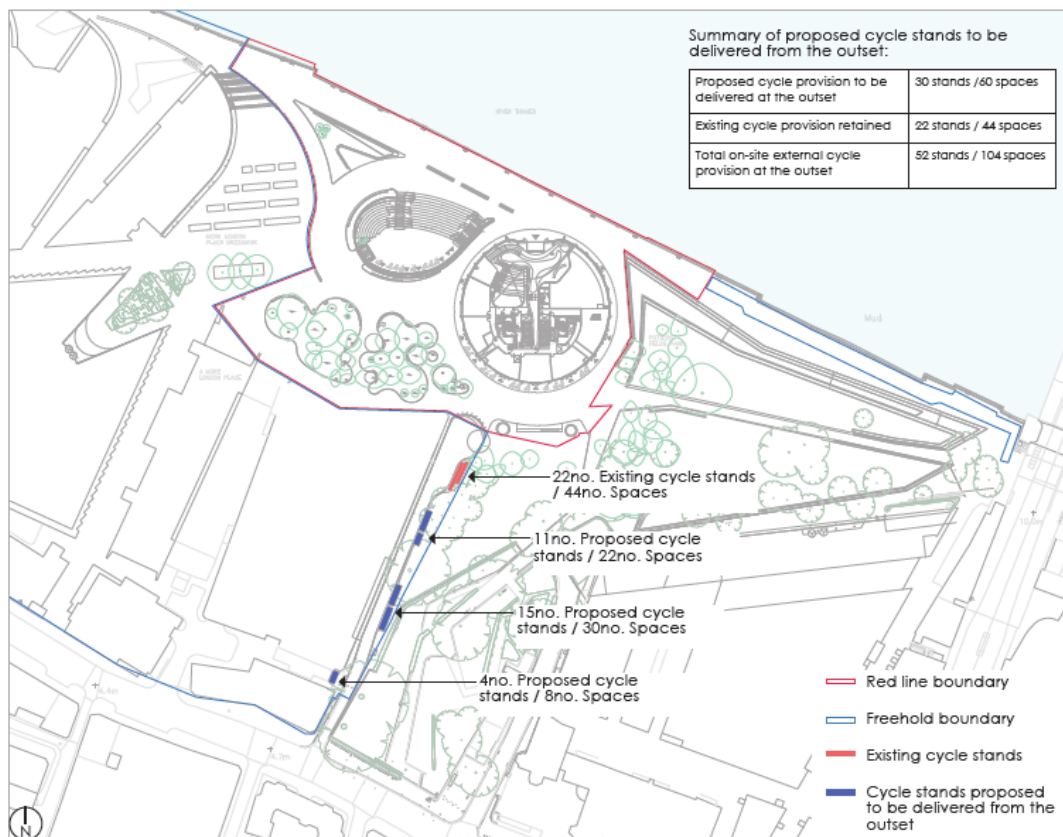
164. The application is accompanied by an outline Delivery, Servicing and Waste Management Plan (DSWMP), which provides a summary of the intended delivery and servicing arrangements for the proposed development. All delivery and servicing for the proposed development would take place within the basement, as per the extant situation. As referenced elsewhere in the report, the basement serves the wider More London estate and is accessed by Tooley Street.

Cycle parking

165. There are currently 50 cycle parking spaces in a long-stay cycle store to serve the office in the basement which is accessed through the internal layout of the basement. Short-stay cycle parking is located throughout the More London estate, including 22 Sheffield stands located at the northern end of Weavers Lane opposite the site.
166. A total of 60 short-stay cycle parking spaces are proposed, in addition to the existing 44 spaces at the northern end of Weaver Lane adjacent to the existing building. This represents a total of 104 spaces, which is a shortfall on the number of spaces required by both the London Plan (194 spaces) and the Southwark Plan (256 spaces) parking standards. However, this is considered acceptable based on the proposed uplift in floorspace, the relatively low utilisation of current cycle parking provision on the More London Estate, and the need to balance cycle parking requirements with the ability to deliver public realm improvements. The applicant has committed to monitoring utilisation of cycle parking as part of the Travel Plan monitoring process post-occupation,

and has identified several areas adjacent to the site which could provide additional cycle parking provision in future if necessary.

167. Long-stay cycle parking for the development is proposed to be provided in accordance with the Southwark Plan in terms of the total number of spaces and these stands are located within the lower ground floor of the site, adjacent to The Scoop. They are accessed via the internal basement service road. The internal arrangements would be similar to what is currently in place.
168. A photograph of the typical internal arrangement within the basement has been provided and it is acknowledged that the basement is relatively well lit. It is however, clearly a vehicle dominated space, with no obvious delineation for cyclists or pedestrians. Whilst it is noted that the basement is existing, the design of the building, basement and wider More London estate is based on requirements from 20+ years ago, and pre-dates the significant increase in cycling since. Supporting information has however been received that confirms that a review of the signage to/ from the basement would be carried out and additional signage has been addressed via condition.
169. It is noted that the provision of Southwark Plan-compliant short term cycle parking, if applied to the total quantum of floorspace proposed, could have a detrimental impact on the public realm in the immediate vicinity of the site due to the number of stands that would be required. As previously noted, there is existing provision of short-stay cycle parking located throughout the More London estate, including opposite the site on Weavers Lane and that this would be added to. The scheme seeks to make the following changes:



This image shows the siting of the proposed cycle parking on Weavers Lane along with the number proposed.

170. The principle of this is broadly accepted, given the provision of existing short-stay cycle parking within the estate and adjacent to the site, as well as the need to balance cycle parking requirements with demands on the public realm.

Active Travel Zone

171. The TA includes an ATZ assessment, which is broadly in line with the TfL 'Healthy Streets' Transport Assessment guidance. The routes to/from the identified within the assessment are agreed and are considered to include the most common destinations and trip attractors.
172. TFL did raise concern that the ATZ assessment had only been undertaken during the daytime and furthermore concluded that no measures to address issues were necessary. They stated that further consideration of the night time situation would need to be undertaken and also that of provision for cycling as well as walking and wheeling. This information was submitted during the course of the application to which TFL accepted.
173. The further information also confirmed that cycle access along Weaver Street would operate as per existing. That given the minimal vehicular flows and spacing between demountable bollards, that this route is not considered to require any improvements to meet the minimal uplift in usage. This route would also provided a good level of lighting.
174. With regards cycling on Tooley Street, this appears to be optimised given the spatial constraints of the road, location of junctions and bus stops along the route.

Transport impacts conclusion

175. Overall it is concluded that the proposed development would not result in any adverse highway conditions, subject to a number of conditions and planning obligations as outlined above.

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

176. The importance of protecting neighbouring amenity is set out 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 adopted 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.
177. The proposed office building as well as The Scoop would be sufficiently set away from the surrounding commercial and residential properties as to not cause a harmful loss of outlook or increase in overlooking. For instance, there would be a distance of approximately 19m to Four More London (offices) and 54m to One Tower Bridge (mixed use but containing residential). The siting and relationship with the surrounding properties would therefore ensure that

the proposed changes would not cause a harmful increase in terms of loss of outlook and privacy.

Noise and vibration:

178. The Scoop is currently used as a multi-purpose space for both sitting, relaxing and for more active endeavours such as performances. These uses and 'shows' would remain but the improvement in layout (to The Scoop) and the new flexible commercial area could reasonably mean an increase in noise. This could however be controlled through appropriately worded conditions and with these in place, would have an acceptable impact.
179. As referenced above, there would be a new flexible commercial spaces on the ground and lower ground floor but the specific operation of this area has not yet been confirmed. The application did however consider this and has submitted an indicative ventilation and extraction statement and this states that it would utilise external ventilation structures or would use openable doors and louvres. This has however been controlled through condition.

Daylight and sunlight

180. The Daylight and sunlight has considered the impact the proposed development would have upon the surrounding and which has confirmed that the impact caused by the proposed development would be minimal and this is expanded upon below.

Daylight:

181. The closest residential development would be One Tower Bridge which is approximately 56m from the site. The other surrounding buildings are a mixture of commercial and office spaces. The report has confirmed that there would be no material change in terms of VSC for the neighbouring buildings.

Overshadowing:

182. For overshadowing, three area of public outdoor amenity have been assessed. These were the eastern part of Potters Field Park, the area surrounding The Scoop and Riverside Walk. All of these spaces would comply with the BRE guidance to be adequately sunlit throughout the year.

Archaeology

183. The site is located in the North Southwark and Roman Roads archaeology priority area. This is a tier one area representing some of the more significant archaeology within the borough. The footprint of City Hall was however excavated as part of the works of the construction of the More London complex as well from the previous construction on the site. For instance, the Archaeological desk based assessment confirmed that 6 investigations took place within or extended into the site prior to the construction of the existing building in 2002. This assessment confirmed that there would only be a localised impact upon truncated archaeological remains of low significance.

The Council's archaeologist has considered and assessed this report and confirmed no conditions regarding this subject are required.

Fire safety

184. Policy D12 of the London Plan (2021) requires all major development to submit a Fire Statement, addressing all criteria outlined by the policy. Paragraph 3.12.9 of Policy D12 explains that Fire Statements should be produced by someone who is "third-party independent and suitably-qualified". The council considers this to be a qualified engineer with relevant experience in fire safety, such as a chartered engineer registered with the Engineering Council by the Institution of Fire Engineers, or a suitably qualified and competent professional with the demonstrable experience to address the complexity of the design being proposed. This should be evidenced in the fire statement. The council accepts Fire Statements in good faith on that basis. The duty to identify fire risks and hazards in premises and to take appropriate action lies solely with the developer.
185. A Fire Statement has been submitted which was prepared by a suitably qualified third-party assessor who is a chartered engineer registered with the Engineering Council by the Institution of Fire Engineers. The statement provides details relating to means of escape and evacuation strategy, passive and active fire safety measures, site access and facilities for the fire and rescue services and access points for the fire services.

Construction management

186. An Outline Construction Environmental Management Plan (CEMP) has been submitted. This sets out how the proposed development would mitigate the environmental impacts from demolition and construction phases of development. This includes controls for noise and vibration, surface and groundwater, ground conditions, transport, air quality and waste. The plan also sets out how the project will maintain contact with affected neighbours and local residents in addition to emergency incident communication, staff training, and health and safety requirements.
187. A planning condition is recommended to secure submission of a Final CEMP including Demolition Management Plan and Construction Logistics Plan (CLP), The final plan needs to give further consideration to the safety of cyclists on C7 and pedestrians, in consultation with TfL and Southwark's Transport Policy and Network Development teams.

Flood risk and Sustainable urban drainage

188. The site is within Flood Zone 3 which is an area with a high probability of flooding that benefits from flood defences. The applicant has submitted a foul sewage and utilities assessment which has been considered and assessed by the LBS Flood Risk Team.

189. With regards the impact, there would be a limited change in footprint and a negligible change in the site's impermeable area. There would also be no significant change in the volume of surface water leaving the site and this would utilise the existing drainage infrastructure. The LBS Flood Risk Team stated that as the impermeable area is not being changed, that the applicant should aim to provide betterment on existing surface water runoff rates through SuDS. This has been addressed through an appropriately worded condition and with this in place, the scheme would have an acceptable impact in terms of flood risk and drainage.

Environment Agency

190. The Environment Agency (EA) were also consulted on the application and initially raised an objection. This objection was associated with the Thames Tidal Flood Defence raising strategy and they requested that the applicant provide a condition survey to demonstrate that the flood defence has a 75-year lifetime. They also recommended that the flood wall that forms part of the application boundary is raised as part of the application.

191. Further meetings between the EA and the applicant were then held and further investigations and reports were carried out. An example being the Intrusive Investigation into the River Wall Report. Trial pits and tests were also carried out for the following:

- Trial pit investigation extension along the whole length of the rod in wall Sections A and C.
- Additional testing of the plate to be included in the survey scope for Mark Browns Wharf (Wall C)
- 2 trial pits have been added into the scope for Section D of Mark Brown's Wharf.

192. The EA have since confirmed that they are satisfied with the revised information but initially recommend imposing conditions on any future permission. These suggested conditions were in reference to the following:

1. Flood defence condition survey
2. Flood defence raising strategy
3. Flood defence monitoring and maintenance and ecological enhancements

193. Two of the conditions recommended (1 and 3 above) have been recommended by officers to the committee but the condition on a flood defence raising strategy (below) has not.

Condition 2 – flood defence raising strategy

Within six months of commencement of the development, a scheme for the design of flood defence raisings, following the existing statutory defence line and not including movable features such as flood gates, shall be submitted to, and approved in writing by, the Local Planning Authority, in consultation with the Environment Agency. The scheme shall include, but not be limited to:

- demonstration of how the flood defence crest levels can be raised to 5.8 metres above Ordnance Datum (mAOD) by 2025;
- a design supported by structural and stability calculations and needed site investigation works;
- details of how the raised flood defence structures and any potential associated ground raising starting immediately landward of the defences will tie in to the flood defences and ground levels, and buildings landward and on the neighbouring sites both upstream and downstream.

Reason:

To protect the development from flooding for its lifetime including with climate change induced sea level rise, in line with the Thames Estuary 2100 plan, and to minimise the risk of flooding to the surrounding built environment. This condition is in line with the National Planning Policy Framework (NPPF) (Paragraph 165), the Greater London Authority's (GLA) London Plan (2021) (Policy SI 12) and the London Borough of Southwark's Local Plan (2022) Policy P68 – Reducing flood risk and P25 River Thames.

194. Planning conditions can only be imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects. No works are proposed to the existing flood defence and any raising of the flood defence itself would be operational development and require planning permission itself. Officers consider this condition is not relevant to the development to be permitted or reasonable.
195. The Environment Agency have maintained their objection so if the planning committee resolve to grant planning permission, a referral to the Secretary of State must be made before a decision notice may be issued.

Air quality

196. The application site is within the Borough's Air Quality Management Area. An Air Quality Assessment has been submitted with the application setting out the likely effects of the proposed development on air quality during the construction and operational phases of development. The assessment concludes that there would not be an unacceptable impact on future users of the site in terms of air quality, in compliance with London Plan Policy SI 1 and Southwark Plan Policy P65.

Energy and sustainability

197. The scheme is not referable to the GLA but in spite of this, the applicant has submitted details concerning circular economy and Whole Life Cycle Statements. These have been considered by the Council's Policy Department who raised question and asked for points of clarification. Further information was received and the impact is referenced below:

Whole life cycle and carbon capture

198. A Whole Life Cycle (WLC) Assessment has been submitted with this

application to capture the proposed development's embodied carbon footprint to show how this would relate to London Plan Policy SI 2 and Southwark Plan Policy P70.

199. Opportunities to reduce embodied carbon have been carefully explored from project inception. Low carbon solutions that have been confirmed feasible and have been captured within the design and include:
- Piled foundation over spreader foundation
 - Opting for minimal intervention of existing structure which also provides future flexibility of the space.
 - Stick system facade
 - Underfloor air distribution system (UFAD) which reduces the quantity of ductwork and pipework required.
 - No internal partitions to allow for a flexible open layout.
200. It is estimated that the proposal would achieve a potential saving of 12% embodied carbon. This would equate to achieving a minimum saving of 1,376kg CO₂e/m² GIA over the whole lifecycle. The GLA benchmark is 1,400kg CO₂e/m² GIA.

Circular economy

201. A Circular Economy Statement (CES) has been submitted with this application setting out the approach to meeting circular economy targets in accordance with London Plan Policies D3 and SI7, Southwark Plan Policy P62 and GLA guidance.
202. The report considers the opportunity of retaining as much of the existing building as possible. Retention of existing foundations and basement plus the minimal intervention of the existing structure would provide a modern office in a prime location at a much lower carbon impact than a complete redevelopment (demolish and new build). There would also be underfloor air distribution system (UFAD) which reduces the quantity of ductwork and pipework required. The proposal is aiming for 95% of non-hazardous waste materials from demolition, construction and excavation to be re-used or recycled.

Carbon emission reduction

203. An Energy Strategy and Sustainability Statement have been submitted setting out how the development aims to reduce operational carbon emissions against Part L 2021 to be net carbon zero, in accordance with the energy hierarchy set out by London Plan Policy London Plan Policy SI 2 and Southwark Plan Policy P70.
204. The development would achieve a carbon saving of 32% and the supporting information has considered as to how further savings could be achieved. For instance, early stage passive design studies were undertaken as to optimise the facade design and these have been implemented as to reduce the carbon

emissions as far as practicable. The applicant has therefore identified limitations to achieving a higher saving but this is under the required 40% as set out in Policy P70 of the Southwark Plan. A final contribution of £372,154 is therefore required as to mitigate this.

Be Lean (use less energy)

205. The supporting information has referenced how the scheme has considered this element. For instance, it references that the façade has been designed as to maximise the daylight level in indoor space, which would reduce the reliance on artificial lighting. Overall, 25% of the 32% saving would be through 'be lean' measures. This would be in compliance with the minimum 15% reduction against Part L required by London Plan Policy SI 2.

Be Clean (supply energy efficiently)

206. A District Heat Network (DHN) connection has been futureproofed and space has been made within the basement to provide future plant that will allow the development to be connected to a DHN in the future. This has therefore been secured in the S106 legal agreement.

Be Green (use low or carbon zero energy)

207. A reduction of 7% has been achieved through maximising the amount of solar photovoltaics (PVs), and the use of boreholes, water source heat pumps (WSPHs) and air source heat pumps (ASHPs).
208. The number of PV panels have been maximised based on the available roof area. As referenced elsewhere in the report, the use of PV on the roof was limited due to the curvature and this makes the remaining part of the roof unsuitable for the installation of PVs. The proposed PV array that has been proposed would however be based on highly efficient PV panels (460 Watt peak per panel) and are proposed to be installed at a tilt angle of 10 degrees, which reduces the self-shading among the installation and allows and increase in number of PVs that can be installed
209. The supporting energy statement has also made reference to utilizing bore holes and heat pumps. It confirms that the commercial units would be provided as a shell and that tenants would install ASHP's as to provide heating and cooling.

Be Seen (Monitor and review)

210. As referenced above, the proposed development would not meet the 40% target for savings against Part L but there are a number of mitigating factors. For instance, the unavailability of a decentralised energy network (at present), and the limited ability to introduce renewable energy due to the form of the building including its spherical roofscape (which limits the amount of PVs that can reasonably be delivered). Therefore, the Proposed Development is considered to accord with the Development Plan overall in the context of applying the energy hierarchy to minimise on-site operational carbon

emissions, and it is noted that net zero carbon will be achieved through the provision of carbon offset contributions.

Overheating and cooling

211. The submitted Energy Assessment sets out that overheating has been modelled and assessed in accordance with guidance, to ensure that summer and winter operative temperature ranges are achieved, in accordance with Southwark Plan Policy P69.

BREEAM

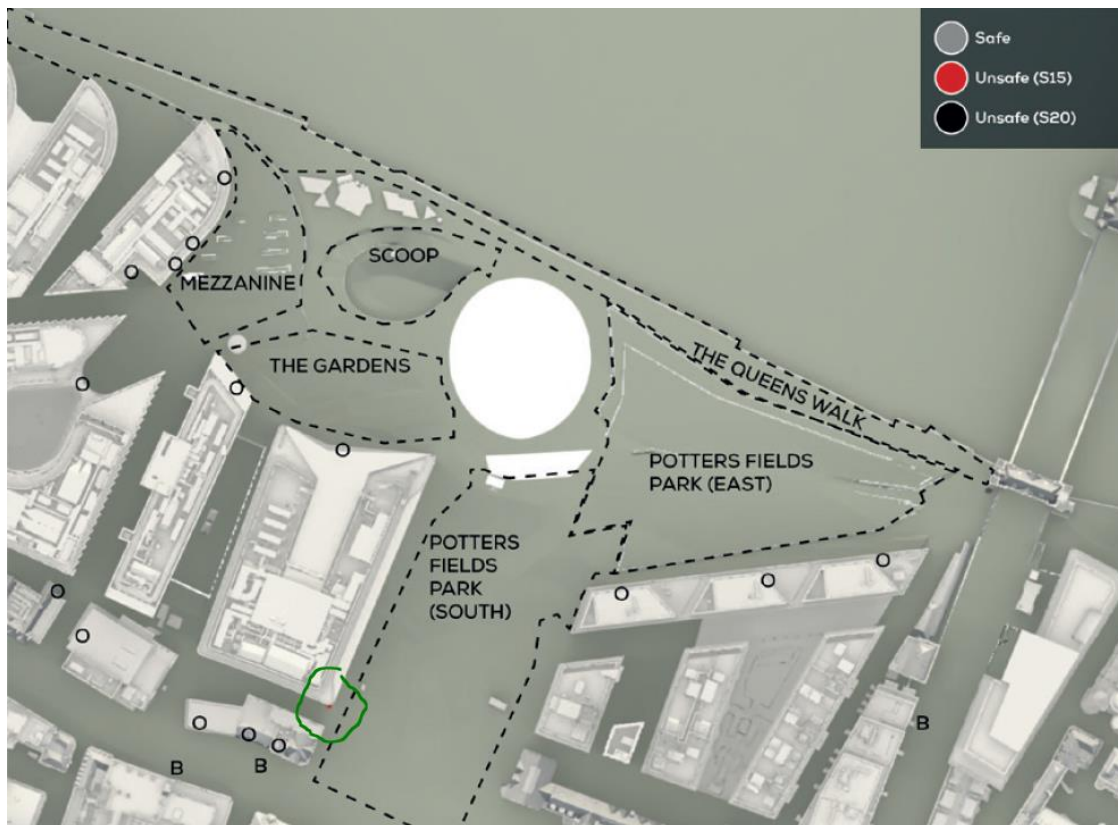
212. The submitted Sustainability Statement sets out the BREEAM pre-assessment results, which show that the proposed development is targeting an excellent rating for both the office and retail units. This would be in compliance with Southwark Plan Policy P69. A planning condition has been imposed to secure a post-construction assessment demonstrating that the targeted BREEAM score has been achieved.

Wind and Microclimate

213. 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 as the proposal is for a tall building.
214. The applicant's Wind Microclimate Report submitted in support of the application considers the following scenarios:
- Scenario 1 – the baseline (existing conditions)
 - Scenario 2 – proposed development with existing buildings.
 - Scenario 3 – proposed development with cumulative surrounding buildings.
 - Scenario 4 – proposed development with terrace planting and existing surroundings.

Existing site with existing buildings (Scenario 1)

215. There is a pre-existing wind safety risk within Weavers Lane which is shown as the red dot in the following image. This has also been outlined in green for clarity:



216. The conditions for The Queens Walk are suitable for sitting in all seasons which is appropriate for the intended use. Conditions for The Gardens are suitable for a mix of sitting and standing in winter and for sitting in summer. This again is appropriate for the intended use. The conditions for The Scoop are also suitable for sitting in all seasons.

217. Conditions for The Mezzanine are suitable for sitting or standing in winter and for sitting summer. This is considered appropriate for the intended use.

Proposed development with existing buildings (Scenario 2)

218. The proposed development would remove the (existing) wind safety risk in Weaver's Lane. The submitted report has also confirmed that there would be no wind safety risks within the site or surrounding area.

219. Potters Fields Park South would have a mix of sitting, standing and leisure walking in winter and for a mix of sitting and standing in summer. This would be suitable for the intended use. The conditions for The Scoop would be acceptable suitable for sitting in all seasons which is again considered appropriate for the intended use. Conditions for The Mezzanine would be suitable for sitting or standing in winter and for sitting summer. This is suitable for the intended use.

220. Conditions for the level 2 to 8 terraces (on both the north and south sides of the development) and also the south facing level 9 terrace, would provide sitting conditions in all seasons. This would be suitable for the intended use. Conditions for the northern level 9 terrace would also be suitable for standing or walking in winter and for standing (with localised regions of sitting) in summer. The extent which is suitable for sitting does raise a level of concern

but to address this, the report looked at including planting in these areas (scenario 4).

Conditions for proposed development with cumulative surrounds (scenario 3)

221. The submitted report has confirmed that there would be no material differences in ground level conditions between this scenario and that of scenario 2 with the proposed development and existing surrounds. All cumulative impacts would be negligible.
222. There would be no material differences in terrace level conditions between this scenario and the scenario with the proposed development and existing surrounds (scenario 2). All cumulative impacts would be considered negligible.

Conditions for the proposed development with terrace planting and existing surrounds

223. The submitted report has stated that there would be no material differences in ground level conditions between this scenario and the scenario with the proposed development and existing surrounds (scenario 2). The introduction of planting in this area would also help overcome the issue referenced above with regards northern facing terrace on level 9. With planting, this would be of benefit.

Conclusion on wind and microclimate:

The scheme currently causes a degree of harm to a specific area on Weavers Lane. The submitted report has confirmed that the proposed changes would mitigate and remove this thus being an improvement. The overall impact of the proposed development is also generally similar to what is currently in place and the overall impact would be acceptable. For instance, the report confirms that there are no wind safety risks associated with the proposed development at either ground level or elevated levels. It also confirms that long term wind comfort conditions would be suitable for the intended use for all thoroughfares, existing building entrances, proposed building entrances, bus stops, active amenity spaces, mixed amenity spaces, seating amenity spaces and proposed terraces.

Mayoral and borough community infrastructure levy (CIL)

224. Section 143 of the Localism Act states that any financial contribution received as community infrastructure levy (CIL) is a material 'local financial consideration' in planning decisions. The requirement for payment of the Mayoral or Southwark CIL is therefore a material consideration. However, the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport invests in London as a whole, primarily Crossrail. Southwark's CIL will provide for infrastructure that supports growth in Southwark.

The site is located within Southwark CIL Zone 1, and MCIL Central London Band 2 Zone. Based on information obtained from CIL form dated 02 April

2024 plus the proposed GIA from the area schedule from the DAS (dated 25 April 2024), the total CIL would be £130,5050.31. This breaks down as £732,868.92 MCIL and £572,181.39 SCIL. This is however an estimate as floor areas will be checked when the CIL Assumption of Liability form is submitted, after planning approval has been secured.

Community involvement and engagement

225. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights
226. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.
227. 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.
228. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.
229. There are a range of potential impacts on the local community during construction and operation. Potential impacts in terms of infrastructure, environmental factors, amenity, accessibility, employment creation and health have been discussed in detail in the relevant sections of this committee report and any necessary mitigation to limit adverse impacts has been secured through s106 obligations and planning conditions (for example construction

impacts will be minimised through the use of a CEMP).

230. This application would help to bring a currently empty and vacant building back into use. There would also be an increase in the number of commercial units as well as improvements to the landscaping. The positive impacts arising from the development would benefit those groups with protected characteristics as well as the wider community as a whole.
231. The proposed development has been designed to ensure inclusive access for all. All public realm areas would have appropriate gradients and slopes/ lifts instead of steps wherever possible. The landscaped areas would also incorporate appropriately designed benches. In addition, there would be level access into the buildings and internally the design incorporates an appropriate provision of wheelchair accessible units, lifts, wide corridors, doors and circulation areas.
232. 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.

Statement of community involvement:

233. In accordance with Southwark's Development Consultation Charter the applicant carried out their own consultation prior to the submission of this planning application; to engage with community and political stakeholders, residents, and neighbours from the area. Their approach to this is set out in their Statement of Community Involvement (SCI) document and the Engagement Summary document submitted with this application and summarised in the table below.
234. Consultation Undertaken by Applicant at Pre-application Stage:

Summary Table

Date	Form of consultation
October, November and December 2023	<ul style="list-style-type: none"> • Meetings with key stakeholders. An example being Historic England (20 November), Potters Field Management Trust (21 November) and Team London Bridge (23 November). • Community newsletters sent to residents and businesses in the local area • Press release and articles were published in the following places: <ul style="list-style-type: none"> <input type="checkbox"/> Architects Journal <input type="checkbox"/> BBC <input type="checkbox"/> Bermondsey Street.London <input type="checkbox"/> CoStar <input type="checkbox"/> Dezeen Magazine

	<ul style="list-style-type: none"> <input type="checkbox"/> Enfield Dispatch <input type="checkbox"/> Evening Standard <input type="checkbox"/> London News Online <input type="checkbox"/> Londonist.com <input type="checkbox"/> London SE1 <input type="checkbox"/> Property Week <input type="checkbox"/> SkyScraper City <input type="checkbox"/> Time Out <input type="checkbox"/> Your Local Guardian <ul style="list-style-type: none"> • Public exhibition in Hay’s Galleria • Information from exhibitions shared on website. • BBC London News also covered the public exhibition and history of the building. This was shown on the news broadcast at 6pm and 10pm on Thursday 7 December 2023.
January 2024	<ul style="list-style-type: none"> • Public webinars (which was recorded) • Community newsletters sent to residents and businesses in the local area • Emails sent to key stakeholders who registered for updates. This included a summary of the feedback and information from the webinar
March/ April 2024	<ul style="list-style-type: none"> • Email sent to all key stakeholders and those who registered for updates to notify of submission and share updates to the final scheme.
Post submission	<ul style="list-style-type: none"> • On-going liaison with all key stakeholders, local residents and businesses

235. In addition to the above, attention should be drawn to the applicants meeting with Foster + Partners. The applicant and their architect (Gensler) visited members of the original design team. They presented the evolution of the project design thus far including concepts and evolving materiality. Comments have not been received from Foster + Partners during the course of this current planning application. The SCI information does however state the following:

“Overall, the engagement was welcomed by Fosters, who recognised the need for change and aspirations for the building. They were supportive of much of the proposals including: maximising greening of the public realm and outdoor amenity space for office tenants to take full advantage of views; re-use of the Scoop to enable public interaction; use of transparency at lower levels to enable the success of the new ground floor retail. They encouraged the team to continue to refine the design of the terrace edge, and to ensure that re-use of the diagrid form is justified and to continue to explore the material palette in partnership with the council.”

236. The Engagement Summary sets out the feedback from the pre-planning public consultation. 18 Feedback forms were received from the 141 attendees at the exhibition. 15 were positive, 2 neutral and 1 objected. These raised items such as the need for public toilets, the 'softening' of the landscape and the request for more retail space than cafés.
237. As shown above, the applicant has gone through various methods and forms of consultation and there seems to be broad support for the proposals. It is noted that feedback has been received but that this has been enacted upon. An example being the reference to public toilets which was actioned prior to the submission of the planning application and further information was also received during the course of the application.
238. The applicant has also considered the representation letters that have been received during the course of the current planning application and have provided responses on these. An example being the issues with toilets. These were raised in the initial consultation and also during the course of the application and further information has been received. Attention is also drawn to the boundary of Potters Field Park. Meetings between the applicant, Potters Field Park Management Trust and the Council were held and an appropriate course of application as to ensure an acceptable boundary treatment was established.

Planning obligations (S.106 agreement)

239. London Plan Policy DF1 and Southwark Plan Policy IP3 advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. These policies are reinforced by the Section 106 Planning Obligations 2015 SPD, which sets out in detail the type of development that qualifies for planning obligations. The NPPF which echoes the Community Infrastructure Levy Regulation 122 which requires obligations be:
- necessary to make the development acceptable in planning terms;
 - directly related to the development; and fairly and reasonably related in scale and kind to the development
240. Following the adoption of Southwark's Community Infrastructure Levy (SCIL) on 1 April 2015, much of the historical toolkit obligations such as Education and Strategic Transport have been replaced by SCIL. Only defined site specific mitigation that meets the tests in Regulation 122 can be given weight.

241.

	Head	Details	
1	Jobs and training during Construction Period	9 jobs 9 training places 3 apprenticeships	Agreed

2	Jobs and training for end use occupation	Discharged as a financial contribution. Contribution based on net additional floorspace and assessed according to the formula 1:13 sq m NIA (for office space) and 1:20 sq m (for flexible commercial space):	Agreed
3	<i>Affordable workspace</i>	<i>No contribution needed since the uplift in office floorspace is less than 500 sq m GIA</i>	N/A
4	Carbon offset contribution	Contribution based on the formula in Southwark SPD of £95 per tonne of CO ₂ over a 30-year period. The relevant calculation applicable to the gross uplift in floorspace is £372,154	
6	Local procurement obligations	The developer will use reasonable endeavours to procure that 10% (by value) of the construction contracts for the development from businesses and organisations based in Southwark.	Agreed
7	Public realm obligations	The public realm works associated with the development shall be carried out and completed in accordance with the specification approved by the Council as part of the planning application prior to beneficial occupation. Where any Walkways Agreement needs to be entered into, or existing agreements varied, the Agreements or variations (as the case may be) shall be completed prior to beneficial occupation.	Agreed
8	The kiosk building	The developer shall, for a period of at 3 months prior to it being dismantled as part of the development, advertise the availability of the kiosk for relocation and re-erection in other public space within the Council's administrative area.	Agreed
10	Legal and administrative costs	That the developer will pay the legal and administrative costs of the Council.	
11	Tree	Means the sum of 12,000 (twelve thousand pounds) to be paid by the Developer to the	Agreed

	contribution	Council towards local street tree planting within the local vicinity.	
13	Future-proofing for district heating network	To enable the development to connect to future district heating networks if deemed feasible	Agreed
14	DSMP and Travel plan monitoring	£2,790 x 2 = £5580	Agreed
15	Parking permit exemption	Future occupiers would be prevented from obtaining parking permits for the surrounding streets	Agreed
17	Small shops retention	At least 10% of all of the proposed (commercial) units would be capable of accommodating small shops.	Agreed
18	TFL	Legible London signage - £12,000	Agreed

242. In the event that an agreement has not been completed by 28 February 2025 the committee is asked to authorise the director of planning to refuse planning permission, if appropriate, for the following reason:

243. In the absence of a signed S106 agreement, there is no mechanism in place to mitigation against the adverse impacts of the development through contributions. It would therefore be contrary to London Plan (2021) Policies DF1, T9, T9 and E3, Southwark Plan (2022) Policies P23, P28, P31, P45, P50, P51 P54, P70, IP3 and the Southwark Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015), Paragraph 57 of the NPPF (2023).

Mayoral and borough community infrastructure levy (CIL)

244. Section 143 of the Localism Act states that any financial contribution received as community infrastructure levy (CIL) is a material 'local financial consideration' in planning decisions. The requirement for payment of the Mayoral or Southwark CIL is therefore a material consideration. However, the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport invests in London as a whole, primarily Crossrail. Southwark's CIL will provide for infrastructure that supports growth in Southwark.

245. The site is located within Southwark CIL Zone 2 and MCIL2 Central London zone. Based on the existing floor areas provided in the agent's CIL Form1 (GIA Info) dated 02-April-24, the gross amount of CIL is approximately £ (pre-relief) consisting £732,868.92 of Mayoral CIL and £572,181.39 of Borough CIL.

Community involvement and engagement

246. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights.
247. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.
248. 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.

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.

249. The protected characteristics are race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.
250. The Public Sector Equality Duty (PSED) requires public authorities to have due regard to the aims of the duty when making decisions and setting policies. As set out in the council's Development Consultation Charter (DCC), the PSED does not apply to developers however, to be compliant with the DCC, the council require developers to support the council in meeting and discharging this important duty by providing a proportionate Equalities Impact Assessment (EqIA) of the impacts of the development. The EqIA must illustrate how the proposal will remove or minimise disadvantages suffered by people due to their protected characteristics, what steps have been taken to meet the needs of people from protected groups where these are different from the needs of other people, and detail positive equalities impacts. This scheme would deliver much needed affordable housing and lack of access to

affordable housing disproportionately effects people from BAME back grounds so this scheme is likely to be beneficial to that group. Similarly the housing would provide accessible residential accommodation that would benefit those with a disability. The commitment to training and apprenticeships would be beneficial for younger people in the area. There are not considered to be any harms that arise from the development to groups with protected characteristics.

Statement of Community Involvement:

251. The applicant has submitted a 'Statement of Community Involvement' (SCI), which includes a summary of the community engagement that took place before the submission of this application. The applicant has gone through two rounds of consultation and there seems to be broad support for the proposals from residents involved in the process.
252. The SCI has stated that initial engagement with key stakeholders took place in October 2023 when a 'handshake letter' was sent to key stakeholders by email to introduce emerging proposals for 110 The Queen's Walk. Meetings – both in-person and online – were held with local stakeholders, including Ward Councillors, community groups and stakeholder bodies. Wider public engagement was undertaken from late November 2023 with a press statement released to media outlets on 24 November 2023 and the circulation of a community newsletter to 4,336 local residential and business addresses on 27 November 2023. These provided details on the emerging proposals and advertised details on the public exhibition events, which took place on Thursday 7 December and Saturday 9 December 2023.
253. The second newsletter included in Shad Thames Resident Association (STRA) was circulated to 700 residents. The public events were widely publicised locally and in national press and were scheduled on weekday evenings and weekends to maximise attendance. They were intentionally held during a period of increased tourist footfall and a total of 141 visitors came to the public exhibition over the two days including residents, workers, Londoners and tourists. The project team was available to discuss any aspect of the project and to answer questions from visitors.
254. A dedicated project website was also launched to further promote the public exhibition. The supporting information has stated that There have been approximately 1,800 unique visitors to the website since its launch and that the site has been visited over 2,200 times and that 3,900 pages have been 'looked at'.
255. In addition to carrying out public consultation, the application has also had correspondence with bodies such as Historic England, Historic Royal Palaces as well as Potters Field Management Trust and Team London Bridge.
256. As referenced elsewhere in the report, the scheme has been updated based on the feedback that has been received. An example being the boundary treatment at Potters Field Park. A meeting was held and appropriate mitigation implemented. Further information and details have also been received

concerning items such as public toilets. This was raised and details of this have been referenced in the above report.

Equalities Impact Assessment (EQIA)

257. The applicant provided an EQIA which was undertaken to systematically define and address any likely differential and disproportionate impacts associated with the Proposed Development on people with protected characteristics.
258. This has been reviewed and the document has been thorough in the collection of data, and this is from accurate and reputable sources. It has also identified all protected characteristic and their representation in the area and assessed the potential impacts against all the protected characteristics and identified mitigations where necessary.

Consultation responses from members of the public and local groups

259. Letters informing neighbours about the planning application were sent by the council in April 2024..

246 neighbours were consulted, 4 comments were received.

- 2 were comments of objection
- 2 neutral comments
- 0 comments in support

260. Summarised below are the planning matters raised by members of the public with an officer response. Further detail on these matters are set out within the relevant sections in the report.

261. Neutral comments:

- This application fails to consider the impact of the development at 224-226 Tower Bridge Road, namely application 24/AP/1207 Condition 17 which shows plans for access to the south side of 110 Queens Walk for the 900 office staff planned for the Tower Bridge development
- Impacts upon a public right of way

262. The objections raised the following issues:

- Needs to have more bins
- Insufficient public toilets
- Continued easy access – cannot block accesses – raised the notion of construction works and this inhibiting those in wheelchairs and in buggies.

Consultation responses from external and statutory consultees

263. Summarised below are the planning matters raised by external and statutory consultees. Matters are addressed within the relevant sections in the Assessment section of this report.

264. Greater London Authority (GLA)

This would not meet any of the categories of the Mayor of London Order - so no need to refer the application.

265. Environment Agency:

Object because officers have not recommended a flood defence raising strategy

266. Metropolitan Police (Design out crime):

No objection but suggested condition.

267. Port of London:

Asked a number of questions which were clarified/ responded to during the course of the application. Asked for conditions to be imposed

268. London Fire Brigade:

No response received.

269. Transport for London (TFL):

Initially raised a number of concerns just as with the ATZ and lighting. Raised concern with the layout of the cycle parking and step free route through the site. Asked for £80,000 for improvements to the Tooley Street cycle docking station and £12,000 for new signage.

Officer response:

The applicant has not agreed the £80,00. Only 17 additional cycle trips are forecast in the morning and 22 in the afternoon and a proportion of these would be via bikes associated with the docking station. We as officers therefore consider that this payment would not be necessary to make the development acceptable.

270. Historic England:

That the proposed development would cause a low level of harm to the significance of Tower Bridge. Modest concern regarding the application on heritage grounds and these representation should be taken into account in the determining the application in consultation with the Council's Design and Conservation Officers.

271. UKPN:

No response received.

272. Arqiva:

No objection

273. Thames water:
Suggested conditions and informatives
274. Team London Bridge:
There is much to welcome but also raised a number of issues such as the narrowing of the eastern footpath. The UGF score being under 0.3. The cultural provision/ events in The Scoop.
275. Shad Thames:
Initial comments - Do not object to the principle but there are not enough toilets. Raised concern about the closing off of a diagonal through route.
- Updated comments were received during the course of the application confirming that they wished to withdraw their initial comments.
276. City of London: No objection but did raise concern about the light/ illumination and the impact on nearby landmarks.

Consultation responses from internal consultees

277. Summarised below are the planning matters raised by internal consultees. Matters are addressed within the relevant sections in the Assessment section of this report.
278. CCTV:
No comment
279. Flood risk:
As the impermeable area is not being changed, we request that the applicant aims to provide betterment on existing surface water runoff rates through SuDS.
280. Waste:
This is a commercial development so no comment.
281. Ecology:
Raised a number of questions during the course of the application which were answered/ responded to. Happy with BNG compliance and suggested conditions.
282. Local Economy Team (LET):
This development would be expected to deliver 30 sustained jobs to unemployed Southwark residents , or meet the Employment and Training Contribution.
283. EPT:
No objection but suggested conditions.
284. Archaeology:
Following discussion with the applicant's archaeologists the assessment submitted with the application has concluded the redevelopment of this site, in

the form described in the application, will not impact upon buried archaeological remains. Therefore no archaeological response is necessary_

285. Community Infrastructure levy: Referenced the amount of CIL that would be payable.

Human rights implications

286. 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.
287. This application has the legitimate aim of providing new residential accommodation. 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

288. The council has published its development plan and Core Strategy on its website together with advice about how applications are considered and the information that needs to be submitted to ensure timely consideration of an application. Applicants are advised that planning law requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise.
289. The council provides a pre-application advice service that is available to all applicants in order to assist applicants in formulating proposals that are in accordance with the development plan and core strategy and submissions that are in accordance with the application requirements.

Positive and proactive engagement: summary table

290.	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?	N/A
	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 – various changes and further information was received such as highway changes. Further information concerning items such as energy and the impact upon Potters Field were received.

To help secure a timely decision, did the case officer submit their recommendation in advance of the statutory determination date?	No – a number of items have raised questions that required changes and further information or clarification.
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CONCLUSION

291. The principle of the proposed development in terms of land use is supported. The site is currently vacant and has been unoccupied for a number of years. What is being proposed would help to occupy as well as modernise the building and surrounding area and bring it back into use.
292. It is noted that this is a well-recognised and famous building. It is extremely visible from a number of vantage points and that there are distinctive design elements. The proposed changes have altered and amended these features but the overall appearance does draw reference to the existing building. The distinctive shape is still recognisable as is the (distinctive) diagrid. The proposed changes would also help address existing problems such as cleaning of the windows whilst also maximising the internal layout. There would also be an improvement to the sustainability of the site.
293. The proposed works would impact upon Borough Open Land but the scheme would remove an existing garage building and replace this with soft landscaping. There would also be a significant improvement in terms of planting on the site, there would be a 104% increase in planting on what is currently in place. The impact would therefore be an improvement on what is currently in place.
294. With appropriate conditions concerning items such as cycle parking and deliveries, the scheme would have an acceptable impact in this regard. As such and for the reasons set out in the Assessment section of this report, it is recommended that planning permission be granted, subject to conditions, the timely completion of a S106 Agreement.

BACKGROUND INFORMATION

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Local Development Framework	Environmental, Neighbourhoods	Planning enquiries telephone: 020 7525 5403 Planning enquiries email:

and Development Plan Documents	and Growth Department 160 Tooley Street London SE1 2QH	planning.enquiries@southwark.gov.uk Case officer telephone: 0207 525 0254 Council website: www.southwark.gov.uk
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APPENDICES

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

AUDIT TRAIL

Lead Officer	Stephen Platts, Director of Planning and Growth	
Report Author	Matt Redman Planning Officer	
Version	Final	
Dated	26 November 2024	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director, Finance	No	No
Strategic Director, Environment, Neighbourhoods and Growth	No	No
Strategic Director, Housing	No	No
Date final report sent to Constitutional Team		26 November 2024

Appendix 1: Recommendation

This document shows the case officer's recommended decision for the application referred to below.

This document is not a decision notice for this application.

Applicant	St Martins Property Investment Ltd	Reg. Number	24/AP/0918
Application Type	Major application		
Recommendation	GRANT subject to Legal Agreement (GLA)	Case Number	

Draft of Decision Notice

Grant subject to Legal Agreement & Referral to GLA for the following development:

Alteration (including demolition) and extension of the existing office building for use as Offices (Class E(g)(i); Flexible Commercial (Class E) to include additional floorspace through extensions; altered and additional entrances; creation of office amenity terraces and plant enclosures; facade alterations including urban greening and associated works.

Associated works including deconstruction / removal of an existing garage / kiosk structure and provision of new hard and soft landscaping within the public realm including improvements to the Scoop, and other works incidental to the development.

(The site is within the setting of the Grade 1 listed Tower Bridge, the Tower of London World Heritage site, and the Tooley Street and Tower Bridge Conservation Areas)

110 The Queens Walk London Southwark SE1 2AA

In accordance with application received on 15 April 2024 and Applicant's Drawing Nos.:

TQW GEN ZZ ZZ DR P 010010 - Site Location Plan

TQW GEN ZZ ZZ DR P 010020 - Site Plan

TQW GEN ZZ B2 DR P 001080 - Existing Plan - Level B2
TQW GEN ZZ B1 DR P 001091 - Existing Plan - Level B1 1 Of 2
TQW GEN ZZ B1 DR P 001092 - *Existing Plan - Level B1 2 Of 2*
TQW GEN ZZ 00 DR P 001101 - Existing Plan - Ground Level
TQW GEN ZZ 01 DR P 001110 - Existing Floor Plan - Level 01
TQW GEN ZZ 02 DR P 001120 - Existing Floor Plan - Level 02
TQW GEN ZZ 03 DR P 001130 - Existing Floor Plan - Level 03
TQW GEN ZZ 04 DR P 001140 - Existing Floor Plan - Level 04
TQW GEN ZZ 05 DR P 001150 - Existing Floor Plan - Level 05
TQW GEN ZZ 06 DR P 001160 - Existing Floor Plan - Level 06
TQW GEN ZZ 07 DR P 001170 - Existing Floor Plan - Level 07
TQW GEN ZZ 08 DR P 001180 - Existing Floor Plan - Level 08
TQW GEN ZZ 09 DR P 001190 - EXISTING FLOOR PLAN - LEVEL 09
TQW GEN ZZ RF DR P 001220 - Existing Floor Plan - Roof Level
TQW GEN ZZ ZZ DR P 001310 - Existing - North Elevation
TQW GEN ZZ ZZ DR P 001320 - Existing - East Elevation
TQW GEN ZZ ZZ DR P 001330 - Existing - South Elevation
TQW GEN ZZ ZZ DR P 001340 - Existing - West Elevation
TQW GEN ZZ ZZ DR P 001410 - Existing Section – Aa
TQW GEN ZZ ZZ DR P 001420 - Existing Section – Bb
TQW GEN ZZ B2 DR P 100080 - Proposed Demolition - B2 Level
TQW GEN ZZ B1 DR P 100091 - Proposed Demolition - B1 Level 1 Of 2
TQW GEN ZZ B1 DR P 100092 - Proposed Demolition - B1 Level 2 Of 2
TQW GEN ZZ 00 DR P 100101 - Proposed Demolition - Ground Level
TQW GEN ZZ 01 DR P 100110 - Proposed Demolition - Level 01
TQW GEN ZZ 02 DR P 100120 - Proposed Demolition - Level 02
TQW GEN ZZ 03 DR P 100130 - Proposed Demolition - Level 03
TQW GEN ZZ 04 DR P 100140 - Proposed Demolition - Level 04
TQW GEN ZZ 05 DR P 100150 - Proposed Demolition - Level 05
TQW GEN ZZ 06 DR P 100160 - Proposed Demolition - Level 06
TQW GEN ZZ 07 DR P 100170 - Proposed Demolition - Level 07

TQW GEN ZZ 08 DR P 100180 - Proposed Demolition - Level 08
TQW GEN ZZ 09 DR P 100190 - Proposed Demolition - Level 09
TQW GEN ZZ RF DR P 100200 - Proposed Demolition - Roof Level
TQW GEN ZZ ZZ DR P 101310 - Proposed Demolition Elevation – North
TQW GEN ZZ ZZ DR P 101320 - Proposed Demolition Elevation – East
TQW GEN ZZ ZZ DR P 101330 - Proposed Demolition Elevation – South
TQW GEN ZZ ZZ DR P 101340 - Proposed Demolition Elevation – West
TQW GEN ZZ ZZ DR P 101410 - Proposed Demolition Section – Aa
TQW GEN ZZ ZZ DR P 101420 - Proposed Demolition Section – Bb
TQW GEN ZZ B2 DR P 120080 - Proposed Floor Plan - Basement 2 Level
TQW GEN ZZ LG DR P 120091 - Proposed Floor Plan - Lower Ground Level 1 Of 2
TQW GEN ZZ LG DR P 120092 - Proposed Floor Plan - Lower Ground Level 2 Of 2
TQW GEN ZZ GF DR P 120101 - Proposed Floor Plan - Ground Level
TQW GEN ZZ 01 DR P 120110 - Proposed Floor Plan - Level 01
TQW GEN ZZ 02 DR P 120120 - Proposed Floor Plan - Level 02
TQW GEN ZZ 03 DR P 120130 - Proposed Floor Plan - Level 03
TQW GEN ZZ 04 DR P 120140 - Proposed Floor Plan - Level 04
TQW GEN ZZ 05 DR P 120150 - Proposed Floor Plan - Level 05
TQW GEN ZZ 06 DR P 120160 - Proposed Floor Plan - Level 06
TQW GEN ZZ 07 DR P 120170 - Proposed Floor Plan - Level 07
TQW GEN ZZ 08 DR P 120180 - Proposed Floor Plan - Level 08
TQW GEN ZZ 09 DR P 120190 - Proposed Floor Plan - Level 09
TQW GEN ZZ 10 DR P 120200 - Proposed Floor Plan - Level 10
TQW GEN ZZ RF DR P 120210 - Proposed Floor Plan - Roof Level
TQW GEN ZZ ZZ DR P 130010 - Proposed - North Elevation
TQW GEN ZZ ZZ DR P 130020 - Proposed - East Elevation
TQW GEN ZZ ZZ DR P 130030 - Proposed - South Elevation
TQW GEN ZZ ZZ DR P 130040 - Proposed - West Elevation
TQW GEN ZZ ZZ DR P 140010 - Proposed Section – AA
TQW GEN ZZ ZZ DR P 140020 - Proposed Section - BB

Time limit for implementing this permission and the approved plans

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

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

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

3. No development shall take place, including any works of demolition, until a written Construction Environmental Management Plan (CEMP) for the site has been submitted to and approved in writing by the Local Planning Authority. The CEMP shall commit the development to current best practice with regard to site management and to use all best endeavours to minimise off site impacts. A copy of the CEMP shall be available on site at all times and shall include the following information:

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

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

- o Arrangements for direct responsive contact for nearby occupiers with the site management during demolition and/or construction (e.g. signage on hoardings, newsletters, resident's liaison meetings);

- o A commitment to adopt and implement of the ICE Demolition Protocol and Considerate Contractor Scheme;

- o Waste Management - Accurate waste identification, separation, storage, registered waste carriers for transportation and disposal to appropriate destinations.

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

Guidance on preparing CEMPs and best construction practice can be found at <http://www.southwark.gov.uk/construction> All demolition and construction work shall then be undertaken in strict accordance with the plan and relevant codes of practice, unless otherwise agreed in writing by the Local Planning Authority.

Reason:

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

4. No development shall take place until a Construction Logistics Plan to manage all freight vehicle movements to and from the site (including routing of inbound and outbound traffic and lay off areas) has been 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 construction of this development. The development shall not be carried out otherwise than in accordance Construction Logistics Plan or any amendments thereto. The use of the adjacent river shall also be considered/ referenced with regards the removal of materials.

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); T1 (Strategic approach to transport), Policy T4 (Assessing and mitigating transport impacts), Policy T7 (Deliveries, servicing and construction), Policy SI 1 (Improving air quality) of the London Plan (2021); Policy P56 (Protection of amenity) of the Southwark Plan (2022).

Further information and guidance is available at:

https://www.clocs.org.uk/resources/clp_guidance_clocs_final.pdf

5. No development (excluding demolition and enabling works) shall commence until full details of the proposed surface water drainage system incorporating Sustainable Drainage Systems (SuDS) have been submitted to and approved in writing by the Local Planning Authority, including detailed design, size and location of attenuation units and details of flow control measures. The strategy should achieve a reduction in surface water runoff rates during the 1% Annual Exceedance Probability (AEP) event plus climate change allowance, as detailed in the Flood Risk Assessment and Surface Water Drainage Strategy prepared by RMA Environmental (March 2024). The applicant must demonstrate that the site is safe in the event of blockage/failure of the system, including consideration of exceedance flows. The site drainage must be constructed to the approved details.

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

6. 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 or the local environment from noise creep due to plant and machinery in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2021

7. Prior to development (other than demolition and enabling works) commencing an Arboricultural Method Statement shall be submitted to and approved in writing by the Local Planning Authority.
 - a) A pre-commencement meeting shall be arranged, the details of which shall be notified to the Local Planning Authority for agreement in writing prior to the meeting and prior to works commencing on site, including any demolition, changes to ground levels, pruning or tree removal.
 - b) A detailed Arboricultural Method Statement showing the means by which any retained trees on or directly adjacent to the site are to be protected from damage by demolition works, excavation, vehicles, stored or stacked building supplies, waste or other materials, and building plant, scaffolding or other equipment, shall then be submitted to and approved in writing by the Local Planning Authority. The method statements shall include details of facilitative pruning specifications and a supervision schedule overseen by an accredited arboricultural consultant.
 - c) Cross sections shall be provided to show surface and other changes to levels, special engineering, foundation or construction details and any proposed activity within root protection areas or the influencing distance (30m) of local trees required in order to facilitate demolition, construction and excavation.

The existing trees on or adjoining the site which are to be retained shall be protected and both the site and trees managed in accordance with the recommendations contained in the method statement. Following the pre-commencement meeting all tree protection measures shall be installed, carried out and retained throughout the period of the works, unless otherwise agreed in writing by the Local Planning Authority.

All Arboricultural Supervisory elements are to be undertaken in accordance with the approved Arboricultural Method Statement site supervision key stages (BS: 5837 (2012)) for this site, as evidenced through signed sheets and photographs.

In any case, all works must adhere to BS5837: (2012) Trees in relation to demolition, design and construction and BS3998: (2010) Tree work - recommendations; BS 7370-4:1993 Grounds maintenance Recommendations

for maintenance of soft landscape (other than amenity turf); EAS 01:2021 (EN) -Tree Pruning Standard; EAS 02:2022 (EN) - Tree Cabling/Bracing Standard; EAS 03:2022 (EN) - Tree Planting Standard. NHBC 4.2.13 Tables for Foundations Near Trees

Reason: To avoid damage to the existing trees which represent an important visual amenity in the area, in accordance with The National Planning Policy Framework 2021 Parts, 8, 11, 12, 15 and 16; Policies G1 (Green Infrastructure, G5 (Urban Greening) and G7 (Trees and Woodlands) of the London Plan 2021); Policies G5 (Urban greening) and G7 (Trees and woodland) of the London Plan (2021); Policy P13 (Design of Places), Policy P56 (Protection of Amenity), Policy P57 (Open Space), Policy P60 (Biodiversity) and P61 (Trees) of the Southwark Plan (2022).

8 Development may not begin unless:

- (a) A biodiversity plan has been submitted to the planning authority: and
- (b) The planning authority has approved the plan.

Reason: To ensure compliance with Schedule A of the Town and Country Planning Act (inserted by the Environment Act)

Permission is subject to the following Grade Condition(s)

9. Prior to commencement of above ground superstructure construction works, 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).

10 HARD AND SOFT LANDSCAPING

Before any above grade work hereby authorised begins, detailed drawings of a hard and soft landscaping scheme showing the treatment of all parts of the site not covered by buildings shall be submitted to and approved in writing by the Local Planning Authority. The site shall be landscaped strictly in accordance with the approved details in the first planting season after completion of the development. Details shall include:

- 1) a scaled plan showing all existing vegetation and landscape features to be retained with proposed trees, hedging, perennial and other plants;
- 2) proposed parking, access, or pathway layouts, materials and edge details;
- 3) location, type and materials to be used for hard landscaping including specifications, where applicable for:
 - a) permeable paving
 - b) tree pit design
 - c) underground modular systems
 - d) sustainable urban drainage integration
 - e) use within tree Root Protection Areas (RPAs);
- 4) typical cross sections;
- 5) a schedule detailing sizes and numbers/densities of all proposed trees/plants;
- 6) specifications for operations associated with plant establishment and maintenance that are compliant with best practise; and
- 7) types and dimensions of all boundary treatments.

There shall be no excavation or raising or lowering of levels within the prescribed root protection area of retained trees unless agreed in writing by the Local Planning Authority.

The landscaping shall not be carried out otherwise than in accordance with any such approval given and shall be retained for the duration of the use. Any trees, shrubs, grass or other planting that is found to be dead, dying, severely damaged or diseased within five years of the completion of the building works OR five years of the carrying out of the landscaping scheme (whichever is later), shall be replaced in the next planting season by specimens of the equivalent stem girth and species in the first suitable planting season.

Unless required by a separate landscape management condition, all soft landscaping shall have a written five-year maintenance programme following planting.

Works shall comply to BS: 4428 Code of practice for general landscaping operations, BS: 5837 (2012) Trees in relation to demolition, design and construction; BS3998: (2010) Tree work - recommendations, BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf); EAS 03:2022 (EN) - Tree Planting Standard.

Reason: So that the Council may be satisfied with the details of the landscaping scheme, in accordance with: Chapters 8, 12, 15 and 16 of the National Planning Policy Framework 2021; Policies SI 4 (Managing heat risk), SI 13 (Sustainable drainage), G1 (Green Infrastructure, G5 (Urban Greening) and G7 (Trees and Woodlands) of the London Plan 2021; Policy P13 (Design of Places), Policy P14 (Design Quality), Policy P56 (Protection of Amenity), Policy P57 (Open Space), Policy P60 (Biodiversity) and P61 (Trees) of the

Southwark Plan (2022).

- 11 Prior to commencement of above grade works full details to show the provision of two disabled parking spaces shall be submitted to and approved in writing by the Local Planning Authority. The document/plans submitted shall detail how the disabled parking bays will provide wheelchair compliant parking standards and also provide details of signage and wayfinding for blue badge bay users, pedestrians and cyclists navigating this area. Subsequently the disabled parking spaces should be made available and retained for the purposes of car parking for the disabled for as long as the development is occupied.

Reason: To ensure that the parking spaces for disabled people are provided and retained in accordance with the National Planning Policy Framework (2023); Policy P55 (Parking Standards for Disabled People and the physically impaired) of the Southwark Plan (2022).

12. Prior to the commencement of any above grade works, a sample of all external facing materials and full-scale (1:1) mock-ups of the typical façade details (to be agreed) to be used in the carrying out of this permission shall be presented on site to the Local Planning Authority and approved in writing. For the avoidance of doubt, these shall include glazing and any metal work etc

The development shall not be carried out otherwise than in accordance with any such approval given. The facades to be mocked up should be agreed with the Local Planning Authority

Reason: In order that the Local Planning Authority may be satisfied that these samples will make an acceptable contextual response in terms of materials to be used, and achieve a quality of design and detailing, are suitable in context and consistent with the consented scheme in accordance with the National Planning Policy Framework (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).

- 13 Prior to the commencement of any above ground superstructure construction works (excluding demolition and archaeological investigation), section detail-drawings (scales to be agreed) through the following elements shall be submitted to the Local Planning Authority for its approval in writing,

- the facades;
- the proposed external lifts;
- the proposed temporary screen in The Scoop
- the balconies;
- parapets; and
- heads, cills and jambs of all doors/ access points

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

Reason: In order that the Local Planning Authority may be satisfied as to the quality of architectural design and details in accordance with 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).

- 14 *Prior to the erection and use of the temporary screen in The Scoop, details of the size, scale and method of erection/ attaching this in place, and confirmation of the number of maximum number of days of use per year, shall be submitted to and approved in writing.*

The screen shall be in place for no more than the maximum number of days per year (a figure which may be amended from time-to-time pursuant to this condition), and shall be removed within 72 hours of each use.

Reason: In order that the Local Planning Authority may be satisfied as to the impact upon the character and appearance of the site and surrounding area and details in accordance with 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).

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

- 15 Prior to Occupation, and notwithstanding the cycle store layouts shown on the submitted drawings, full details of the cycle parking facilities (including cross sections, with aisle widths and floor to ceiling heights clearly labelled) shall be submitted to and approved by the Local Planning Authority. It shall provide a minimum of 435 spaces within long-stay cycle stores, and a minimum of 60 (new) short-stay spaces. For the avoidance of doubt, these 60 spaces are in addition to the existing 44 spaces at the northern end of Weavers Lane. This would take the total number of spaces to 104 spaces located within the public realm of the scheme.

Reason - To promote sustainable travel and to ensure compliance with Chapter 9 (Promoting sustainable transport) of the National Planning Policy Framework (2023); Policy T5 (Cycling) of the London Plan (2021), Policy P53 (Cycling) of the Southwark Plan (2022) and Chapter 8 of the London Cycle Design Standards (2014).

16. a) The development hereby approved shall achieve a BREEAM rating of 'Excellent' or higher, and achieve at least the BREEAM excellent standard for the 'Wat 01' water category or equivalent (commercial development) in the BREEAM Pre-Assessment hereby approved

b) Before the first occupation of the building hereby permitted, the submission to BRE Post Construction Review documents (or other verification process agreed with the Local Planning Authority), and evidence of the submission to BRE, shall be submitted to and approved in writing by the Local Planning Authority, confirming that the agreed 'Excellent' standard as outlined within the submitted BREEAM pre-assessment have been met.

c) Once certification of the Post Construction Review has been completed by BRE, the certified Post Construction Review including the certificate shall be submitted to and approved in writing by the Local Planning Authority, confirming that the agreed 'Excellent' standard as outlined within the submitted BREEAM pre-assessment have been met.

Reason: To ensure the proposal complies with the National Planning Policy Framework (2023); Policy SI 2 (Minimising Greenhouse Gas Emissions) of the London Plan (2021); Policy SI 5 (Water Infrastructure) of the London Plan (2021) and Policy P69 (Sustainability standards) and Policy P70 (Energy) of the Southwark Plan (2022)

17. Any deliveries or collections to the commercial units shall only be between the following hours: 08:00 - 23:00 Monday to Fridays, 09:00 - 18:00 on Saturdays and 10:00 - 19:00 on Sundays and Bank Holidays unless otherwise agreed in an approved delivery and servicing management plan.

The use of the commercial spaces (including the scoop) as well as any external terraces associated with the offices shall not be permitted outside the hours of: 07:00 - 23:00 .

Reason: To safeguard the amenity of neighbouring residential properties in accordance with the National Planning Policy Framework (2023); Policy P56 (Protection of amenity) and Policy P66 (Reducing noise pollution and enhancing soundscapes) of the Southwark Plan (2022).

18. (a) Details of any external lighting (including: design; power and position of luminaries; light intensity contours) of all affected external areas (including areas beyond the boundary of the development) in compliance with the Institute of Lighting Professionals (ILE) Guidance Note 1 for the reduction of obtrusive light (2021), shall be submitted to and approved by the Local Planning Authority in writing before any such lighting is installed.

(b) The development shall not be carried out otherwise than in accordance with any such approval given. Prior to the external lighting being used, a validation report shall be submitted to the Local Planning Authority for approval in writing.

Reason: In order that the Council may be satisfied as to the details of the development in the interest of the visual amenity of the area, the amenity and

privacy of adjoining occupiers, the impact upon nearby heritage assets and their protection from light nuisance, in accordance with the National Planning Policy Framework (2023), London Plan (2021) Policy G6 (Biodiversity and access to nature) and Policy P56 (Protection of amenity) and P60 (Biodiversity) of the Southwark Plan (2022).

- 19 Prior to the occupation of the development or any phase of the development, whichever is the sooner, a landscape management plan, including long term design objectives to meet BNG requirements, management responsibilities and maintenance schedules for all landscape areas, other than small, privately owned, domestic gardens, shall be submitted to and approved by the Local Planning Authority.

Details of an irrigation schedule shall be provided for all trees to ensure successful establishment.

The scheme shall also include the following elements: vertical greening/ the greening of the building, terraces, landscaping and ecological features

For stem girths of up to 20cm the schedule shall be a minimum of three years, and five years for stem girths greater than 20cm. The landscape management plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the local planning authority.

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.

Works shall comply to BS: 4428 Code of practice for general landscaping operations, BS: 8545 (2014) Trees: from nursery to independence in the landscape; BS3998: (2010) Tree work - recommendations; BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf); EAS 01:2021 (EN) -Tree Pruning Standard; EAS 03:2022 (EN) - Tree Planting Standard.

Reason: So that the Council may be satisfied with the details of the landscaping scheme, in accordance with: Chapters 8, 12, 15 and 16 of the National Planning Policy Framework 2021; Policies SI 4 (Managing heat risk), SI 13 (Sustainable drainage), G1 (Green Infrastructure, G5 (Urban Greening) and G7 (Trees and Woodlands) of the London Plan 2021; Policy P13 (Design of Places), Policy P14 (Design Quality), Policy P56 (Protection of Amenity), Policy P57 (Open Space), Policy P60 (Biodiversity) and P61 (Trees) of the Southwark Plan (2022).

- 20 Prior to any occupation of the development hereby approved a Flood Warning

and Evacuation Plan shall be submitted to and approved in writing by the Local Planning Authority. The plan should state how occupants will be made aware that they can sign up to the Environment Agency Flood Warning services, and of the plan itself. The plan should provide details of how occupants should respond in the event that they receive a flood warning, or become aware of a flood. The report should be proportionate and risk based in terms of sources of flooding. Once approved, the measures shall remain for as long as the development is occupied.

Reason: To ensure that the development is designed to ensure safety of the building users during extreme flood events, to mitigate residual flood risk and ensure safety of the future occupants of the proposed development and to provide safe refuge and ensure safety of the future occupants of the proposed development in accordance with the National Planning Policy Framework (2023); Policy P56 (Protection of amenity) and Policy P68 (Reducing flood risk) of the Southwark Plan (2022).

- 21 Details of bat tubes, bricks or boxes shall be submitted to and approved in writing by the Local Planning Authority prior to any superstructure works commencing on site.

No less than 3 bat tubes, bricks or boxes shall be provided and the details shall include the exact location, specification and design of the habitats. The bat tubes, bricks or boxes shall be installed with the development prior to the first occupation of the building to which they form part or the first use of the space in which they are contained.

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

Discharge of this condition will be granted on receiving the details of the roost features and mapped locations and the Local Planning Authority agreeing the submitted plans, and once the roost features are installed in full in accordance to the agreed plans.

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 G1 (Green Infrastructure), Policy G5 (Urban Greening), Policy G6 (Biodiversity and access to nature) of the London Plan (2021); Policy P59 (Green infrastructure) and Policy P60 (Biodiversity) of the Southwark Plan (2022).

22. Prior to occupation, a lighting design strategy for biodiversity shall be submitted to and approved in writing by the local planning authority. The strategy shall:
- a) identify those areas/features that are particularly sensitive for bats and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and show how and where external lighting will be

installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places. All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.

Reason: To ensure compliance with the Habitats Regulations and the Wildlife & Countryside Act (1981), (as amended), and because bats are known to be active in vicinity of the development site.

23. Prior to occupation, the completed schedule of site supervision and monitoring of the arboricultural protection measures as approved in tree protection condition shall be submitted for approval in writing by the Local Planning Authority. This condition may only be fully discharged on completion of the development, subject to satisfactory written evidence of compliance through contemporaneous supervision and monitoring of the tree protection throughout construction by the retained project or pre-appointed tree specialist.

Works shall comply to BS: 5837 (2012) Trees in relation to demolition, design and construction; BS3998: (2010) Tree work - recommendations; BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf); EAS 01:2021 (EN) - Tree Pruning Standard; EAS 02:2022 (EN) - Tree Cabling/Bracing Standard; EAS 03:2022 (EN) - Tree Planting Standard.

Reason: To avoid damage to the existing trees which represent an important visual amenity in the area, in accordance with the National Planning Policy Framework (2023) Chapters 7 (Ensuring the vitality of town centres), 8 (Promoting healthy and safe communities), 11 (Making effective use of land), 12 (Achieving well-designed places), Chapter 14 (Meeting the challenge of climate change), and chapters 15 & 16 (Conserving and enhancing the natural and historic environment); Policy G7 (Trees and Woodlands) of the London Plan (2021); Policy P13 (Design of Places), Policy P14 (Design Quality), Policy P56 (Protection of Amenity), Policy P57 (Open Space), Policy P60 (Biodiversity) and P61 (Trees) of the Southwark Plan (2022).

24. Details of invertebrate nesting aids shall be submitted to and approved in writing by the Local Planning Authority prior to first occupation of the development.

No less than 3 invertebrate nesting aids shall be provided and the details shall include the exact location, specification and design of the habitats. Bee bricks and/or invertebrate hotels shall be installed with the development prior to the first occupation of the building to which they form part or the first use of the

space in which they are contained.

The nesting aids shall be installed strictly in accordance with the details so approved, and shall be maintained as such thereafter.

Discharge of this condition will be granted on receiving the details of the invertebrate features and mapped locations and the Local Planning Authority agreeing the submitted plans, and once the invertebrate features are installed in full in accordance with the agreed plans.

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 G1 (Green Infrastructure), Policy G5 (Urban Greening), Policy G6 (Biodiversity and access to nature) of the London Plan (2021); Policy P59 (Green infrastructure) and Policy P60 (Biodiversity) of the Southwark Plan (2022).

25. Prior to the commencement of use, full particulars and details of a scheme for the extraction and ventilation of each commercial kitchen shall be submitted to and approved by the Local Planning Authority. The scheme shall include:

- The siting of all the kitchens
- 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 terminals
- A management \ servicing plan for maintenance of the extraction system. The plan shall detail how all components of the extraction system shall be cleaned, serviced, maintained and replaced to prevent degradation in performance affecting surrounding amenity. Once approved the plan shall be implemented in full and permanently adhered to thereafter

Once approved the scheme shall be implemented in full and permanently maintained thereafter.

Reason: In order to ensure that any installed ventilation, ducting and ancillary equipment in the interests of amenity will not cause amenity impacts such as odour, fume or noise nuisance and will not detract from the appearance of the building in accordance with the National Planning Framework (2023); Policy P56 (Protection of amenity) and Policy P65 (Improving air quality) of the Southwark Plan (2022).

- 26 Before the first occupation of the building hereby approved, details of the installation (including location, type and commissioning certificate) of the infrastructure for electric vehicle charger points for two parking spaces shall be submitted to and approved in writing by the Local Planning Authority and the electric vehicle charger points shall be installed prior to occupation of the

development and retained in perpetuity.

To ensure that there would be adequate provision for electric cars, in accordance with Policy T6.1 (Residential parking) of the London Plan (2021) and Policy P54 (car parking)

- 27 Prior to occupation, details of six bird boxes shall be submitted to and approved in writing by the Local Planning Authority prior to any superstructure works commencing on site.

No less than two house sparrow terraces, two double cavity swift boxes and two generic bird boxes (32mm entrance hole) shall be provided. Details shall include the exact location, specification and design of the bird boxes. The boxes shall be installed in suitable locations on mature trees or on buildings prior to the first occupation of the site.

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

Discharge of this condition will be granted on receiving the details of the nest/roost features and mapped locations and the Local Planning Authority agreeing the submitted plans, and once the nest/roost features are installed in full in accordance to the agreed plans.

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with National Planning Policy Framework (2023); Policy G1 (Green Infrastructure), Policy G5 (Urban Greening), Policy G6 (Biodiversity and access to nature) of the London Plan (2021); Policy P59 (Green infrastructure) and Policy P60 (Biodiversity) of the Southwark Plan (2022)

- 28 The building shall not be occupied until a drainage verification report prepared by a suitably qualified engineer has been submitted to and approved in writing by the Local Planning Authority. The report shall provide evidence that the drainage system (incorporating SuDS) has been constructed according to the approved details and specifications (or detail any minor variations where relevant) as detailed in the Flood Risk Assessment and Drainage Strategy prepared by RMA dated March 2024 and shall include plans, photographs and national grid references of key components of the drainage network such as surface water attenuation structures, flow control devices and outfalls. The report shall also include details of the responsible management company.

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

- 29 Prior to above ground works, a management plan confirming details of the operation and internal layout of the publicly accessible flexible commercial spaces at lower ground floor shall be submitted to and approved in writing by

the Local Planning Authority. This management plan shall confirm (but not be limited to) items such as the opening hours and proposed usage as well as access and operation of the publicly accessible toilets.

Reason: To achieve a quality of design and detailing, are suitable in context and consistent with the consented scheme in accordance with the National Planning Policy Framework (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).

30 a) The development hereby permitted shall incorporate security measures to minimise the risk of crime and to meet the specific security needs of the development in accordance with the principles and objectives of Secured by Design. Details of these measures shall be submitted to and approved in writing by the local planning authority prior to commencement of above ground superstructure construction works and shall be implemented in accordance with the approved details prior to occupation.

b) Prior to occupation a satisfactory Secured by Design inspection must take place. The resulting Secured by Design certificate shall be submitted to and approved 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); Policy P16 (Designing out crime) of the Southwark Plan (2022).

31 a) Before the first occupation of each part of the building hereby permitted commences, the applicant shall submit in writing and obtain the written approval of the Local Planning Authority to a Travel Plan in relation to the relevant part of the building, written in accordance with TfL best guidance at the time of submission, setting out the proposed measures to be taken to encourage the use of modes of transport other than the car by all users of the building, including staff and visitors. For the avoidance of doubt, this include modes of transport on the Thames.

b) At the start of the second year of operation of the approved Travel Plan, a detailed survey showing the methods of transport used by all those users of the building to and from the site and how this compares with the proposed measures and any additional measures to be taken to encourage the use of public transport, walking and cycling to the site shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise in accordance with any such approval given.

c) At the start of the fifth year of operation of the approved Travel Plan a detailed survey showing the methods of transport used by all those users of the building to and from the site and how this compares with the proposed

measures and any additional measures to be taken to encourage the use of public transport, walking and cycling to the site shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise in accordance with any such approval given.

Reason: In order that the use of non-car based travel is encouraged in accordance with the National Planning Policy Framework (2023); Policy T6 (Car parking) of the London Plan (2021); Policy P54 (Car parking) of the Southwark Plan (2022). The Port of London shall also be consulted on this travel plan.

- 32 Prior to the occupation of the development, a delivery and servicing management plan (DSMP) shall be submitted to and approved in writing by the Local Planning Authority, and shall include the following:

- (a) strategy for deliveries and collections;
- (b) number of servicing trips (including maintenance);
- (c) details for management and receipt of deliveries
- (d) measures to minimise the number of servicing trips overall;
- (e) measures to encourage deliveries and servicing by electric vehicle, cycle, foot and other non-private vehicular means;
- (f) cleaning and waste removal, including arrangements for storage of waste and refuse collection;
- (g) monitoring and review of operations;
- (h) details of potential delivery consolidation.

The DSMP shall be implemented once any part of the development is occupied and shall remain in place unless otherwise agreed in writing.

Reason - To ensure that the impacts of delivery and servicing on the local highway network and general amenity of the area are satisfactorily mitigated in accordance with the National Planning Policy Framework (2023), Policies T4 (Assessing and mitigating transport impacts) and T7 (Deliveries, servicing and construction) of the London Plan (2021) and Policies P14 (Design quality), P18 (Efficient use of land), P50 (Highways impacts) of the Southwark Plan (2022).

- 33 Prior to occupation of the development a Parking Management Plan, detailing how the proposed accessible parking spaces will be managed and allocated, shall be submitted to and approved in writing by the local planning authority.

Reason: To meet the requirements of London Plan Policy T6.1. Southwark Plan Policy P55 ensures the mobility needs of disabled/mobility impaired people are provided consistently, conveniently, and to a high standard. BS8300 sets the required standards for the design of Blue Badge parking spaces off-street as per section 7.4.1 and Figure 3; and within car parks and garages as per section 7.6 and Figures 4, 5 & 6.

- 34 Prior to occupation, the completed schedule of site supervision and monitoring of the arboricultural protection measures as approved in tree protection condition shall be submitted for approval in writing by the Local Planning Authority. This condition may only be fully discharged on completion of the development, subject to satisfactory written evidence of compliance through contemporaneous supervision and monitoring of the tree protection throughout construction by the retained project or pre-appointed tree specialist.

Works shall comply to BS: 5837 (2012) Trees in relation to demolition, design and construction; BS3998: (2010) Tree work - recommendations; BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf); EAS 01:2021 (EN) - Tree Pruning Standard; EAS 02:2022 (EN) - Tree Cabling/Bracing Standard; EAS 03:2022 (EN) - Tree Planting Standard.

Reason: To avoid damage to the existing trees which represent an important visual amenity in the area, in accordance with the National Planning Policy Framework (2023) Chapters 7 (Ensuring the vitality of town centres), 8 (Promoting healthy and safe communities), 11 (Making effective use of land), 12 (Achieving well-designed places), Chapter 14 (Meeting the challenge of climate change), and chapters 15 & 16 (Conserving and enhancing the natural and historic environment); Policy G7 (Trees and Woodlands) of the London Plan (2021); Policy P13 (Design of Places), Policy P14 (Design Quality), Policy P56 (Protection of Amenity), Policy P57 (Open Space), Policy P60 (Biodiversity) and P61 (Trees) of the Southwark Plan (2022).

Permission is subject to the following Compliance Condition(s)

- 35 The development shall achieve full compliance with the air quality assessment mitigation measures as detailed in [The Air Quality Assessment prepared by WKC, dated March 2024]

Reason: To protect future occupiers from poor external air quality in accordance with the National Planning Policy Framework (2023); Policy P56 (Protection of amenity) and Policy P65 (Improving air quality) of the Southwark Plan (2022).

- 36 The development hereby permitted is limited to 18618 sqm (GIA) of office (Class E(g) space, 3380 sqm (GIA) of Flexible Class E floorspace, a maximum height of 50.40 metres AOD

Reason: This is in accordance with the application details and the approved plans.

- 37 The development hereby approved shall be carried out in accordance with the recommendations of the Fire Strategy Statement (document completed by

Marshall Fire LTD, dated 28/03/2024) unless a revised Fire Statement is submitted to and approved in writing by the Local Planning Authority prior to the relevant works being carried out.

Reason: To ensure that the development incorporates the necessary fire safety measures in accordance with Policy D12 (Fire safety) of the London Plan (2021).

- 38 No drainage systems for the infiltration of surface water drainage into the ground are permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. The development shall be carried out in accordance with the approval details.

Reason: To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants. This is in line with the National Planning Policy Framework (2023). Infiltrating water has the potential to cause remobilisation of contaminants present in shallow soil/made ground which could ultimately cause pollution of groundwater.

- 39 No roof plant, equipment or other structures, other than as shown on the plans hereby approved or approved pursuant to a condition or obligation of this permission, shall be placed on the roof or be permitted to project above the roofline of any part of the buildings as shown on elevation drawings unless agreed in writing with the Local Planning Authority.

Reason: In order to ensure that no additional plant is placed on the roof of the building in the interest of the appearance and design of the building and the visual amenity of the area in accordance with the National Planning Policy Framework (2023); Policy D4 (Delivering good design) of the London Plan (2021); Policy P13 (Design of places), Policy P14 (Design quality) and Policy P56 (Protection of amenity) of the Southwark Plan (2022).

- 40 Bar the provision of CCTV equipment and notwithstanding the provisions of Schedule 2, Part 16 The Town & Country Planning (General Permitted Development) Order 2015 (as amended or re-enacted) no further external telecommunications equipment or structures shall be placed on the roof or any other part of a building hereby permitted.

Reason: In order to ensure that no telecommunications plant or equipment which might be detrimental to the design and appearance of the building and visual amenity of the area is installed on the roof of the building in accordance with the National Planning Policy Framework (2023); Policy P55 (Protection of amenity) and Policy P13 (Design of places) of the Southwark Plan (2022).

- 41 Measures to control emissions during the construction phase must be

incorporated into an Air Quality and Dust Management Plan (AQDMP), or form part of a Construction Environmental Management Plan, in line with the requirements of the Control of Dust and Emissions during Construction and Demolition SPG. The AQDMP should be approved by the LPA (London Plan Policy SI 1 (D)).

Reason: To protect future occupiers from poor external air quality in accordance with the National Planning Policy Framework (2023); Policy P56 (Protection of amenity) and Policy P65 (Improving air quality) of the Southwark Plan (2022).

- 42 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 Council.

Reason: To ensure such works do not detract from the appearance of the building (s) in accordance with The National Planning Policy Framework (2023); Policy D4 (Delivering good design) of the London Plan (2021) and Policy P13 (Design of places) and Policy P14 (Design quality) of the Southwark Plan (2022).

- 43 On-site plant and machinery must comply with the London Non-Road Mobile Machinery (NRMM) Low Emission Zone standards for Opportunity Areas (London Plan Policy SI 1 (D)).

- 44 Details of the appliance/plant for generating energy for the Proposed Development must be submitted to, and agreed by the LPA before installation. This is to ensure that the system is as good as, or better than that used in the AQN assessment.

- 45 The use of the backup generator(s) is restricted to emergency use and operational testing (less than 50 hours per year) unless agreed in writing with the Local Planning Authority.

Informatives

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

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

Appendix 2: Relevant Planning Policy

National Planning Policy Framework (NPPF)

The revised National Planning Policy Framework ('NPPF') was published in December 2023 which sets out the national planning policy and how this needs to be applied. The NPPF focuses on sustainable development with three key objectives: economic, social and environmental.

Paragraph 218 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications. The particularly relevant chapters from the Framework are:

- Section 2 - Achieving sustainable development
- Section 6 - Building a strong, competitive economy
- Section 11 - Making effective use of land
- Section 12 - Achieving well-designed and beautiful places
- Section 14 - Meeting the challenge of climate change, flooding and coastal change
- Section 16 - Conserving and enhancing the historic environment

The London Plan 2021

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

- Policy SD4 The Central Activities Zone (CAZ)
- Policy SD5 Offices, other strategic functions and residential development in the CAZ approach
- Policy D4 Delivering good design
- Policy D5 Inclusive design
- Policy D8 Public realm
- Policy D12 Fire safety
- Policy E1 Offices
- Policy E2 Providing suitable business space
- Policy E3 Affordable workspace
- Policy G5 Urban greening
- Policy HC1 Heritage conservation and growth
- Policy SI 2 Minimising greenhouse gas emissions
- Policy SI 3 Energy infrastructure
- Policy SI 4 Managing heat risk
- Policy SI 7 Reducing waste and supporting the circular economy
- Policy SI 12 Flood risk management
- Policy SI 13 Sustainable drainage

- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling
- Policy T6 Car parking
- Policy T6.2 Office Parking
- Policy T6.5 Non-residential disabled persons parking
- Policy T7 Deliveries, servicing and construction

Southwark Plan 2022

The Southwark Plan 2022 was adopted on 23 February 2022. The plan provides strategic policies, development management policies, area visions and site allocations which set out the strategy for managing growth and development across the borough from 2019 to 2036. The relevant policies are:

- P13 Design of places
- P14 Design quality
- P16 Designing out crime
- P18 Efficient use of land
- P19 Listed buildings
- P20 Conservation areas
- P21 Conservation of the historic environment and natural heritage
- P24 World Heritage Site
- P26 Local list
- P28 Access to employment and training
- P30 Office and business development
- P31 Affordable workspace
- P50 Highways impacts
- P51 Walking
- P53 Cycling
- P54 Car Parking
- P55 Parking standards for disabled people and the physically impaired
- P59 Green infrastructure
- P60 Biodiversity
- P61 Trees
- P62 Reducing waste
- P65 Improving air quality
- P66 Reducing noise pollution and enhancing soundscapes
- P67 Reducing water use
- P69 Sustainability standards
- P70 Energy

Also of relevance in the consideration of this application is the Sustainable Design and Construction SPD 2008, the Heritage SPD 2021 and the adopted Tooley Street and Tower Bridge conservation area appraisals. The Historic England guidance, "The setting of heritage assets" Good Practice Advice in Planning no.3 (December 2017) would also need to be given appropriate weight.

Appendix 3: Relevant planning history of the site and nearby sites

Planning history of the site, and adjoining or nearby sites:

The building was originally granted planning permission under planning permission 99/AP/1000. This was granted consent on 19.01.2000 for: Construction of 9 storey headquarters building for the Greater London Authority with ancillary servicing, parking, hard and soft landscaping, and other incidental works to the development of the application site. As referenced above, the site was occupied by the GLA until it moved headquarters in March 2022.

A number of applications have also been submitted/ determined with regards the area adjacent the site. For instance, 23/AP/2779 was granted consent for: "The annual erection and installation of circa 65 wooden cabins across the London Bridge City estate for the Christmas market event from November 1st to January 7th. The development is comprised of 6 Zones of cabins across the London Bridge City estate and along Queen's Walk including; Zone 1 - Riverside/The Scoop, Zone 2 - Riverside/Tavolino Steps, Zone 3 - Riverside/HMS Belfast, Zone 4 - Riverside/Upper Deck bar (by HMS Belfast), Zone 5 - Riverside/Southwark Crown Court and Zone 6 - Hay's Galleria. The cabins will measure 10x8ft, 10x6ft, 10x5ft, 10x4ft and 20x10ft, respectively. There will be a range of items on offer including hot and cold beverages/food, arts & crafts and general goods. The event will also see two pop-up bars, one at the top of The Scoop on the riverside and one at London Bridge City Pier at the back of Cottons Centre."

These cabins are erected annually on a temporary basis. This would need to be considered when determining items such as the access to The Scoop. If the erection of these structures is not to continue in the future, then this should be referenced in supporting documentation. If they are to continue, reference should then be made to the siting of these structures to show that they have been taken into account.

The site was also subject to a pre-application enquiry under reference 23/EQ/0084 (April 2023). The main issues related to the design and impact upon the nearby heritage assets. There were also concerns with items such as the greening of the site, the lift/ screen in the Scoop as well as the use of the lower ground floor.

A recent screening opinion (reference 23/AP/3463, dated 03.01.2024) confirmed that an Environmental Impact Assessment (EIA) would not be required alongside any application seeking planning permission for the site's redevelopment for "major refurbishment and extension of the building, providing up to approximately 22,000m² of commercial, business and service floorspace (Use Class E), predominantly for office use, with associated public realm improvements and landscaping".

There are a number of other extant planning permissions, as well as applications for planning permission currently under consideration, in the wider surrounding area. However none of these are considered to be directly relevant to the proposal.

Appendix 4: Consultation undertaken

Site notice date: 18/04/2024

Press notice date: 25/04/2024

Case officer site visit date: n/a

Neighbour consultation letters sent: 17/04/2024

Internal services consulted

formal consultation and response to Pol

LBS Highways Development & Management

LBS Transport Policy

LBS Ecology

LBS Design & Conservation Team [Surgery]

LBS Archaeology

LBS Planning Enforcement

LBS Highways Licensing

Housing Regeneration and Delivery

LBS Waste Management

formal consultation and response to Pol

LBS Ecology

LBS Urban Forester

LBS Design & Conservation Team [Formal]

LBS Urban Forester

LBS Highways Development & Management

LBS Transport Policy

LBS Local Economy

LBS Environmental Protection

LBS Flood Risk Management & Urban Drain

formal consultation and response to Pol

LBS Community Infrastructure Levy Team

LBS Ecology

LBS Transport Policy

LBS Ecology

Statutory and non-statutory organisations

EDF Energy

Great London Authority

London Fire & Emergency Planning Authori

London Underground

Natural England - London & South East Re

Network Rail

Metropolitan Police Service (Designing O

Transport for London

Thames Water

Environment Agency

Historic England

Environment Agency

Neighbour and local groups consulted:

Suite 145A First Floor 3 More London Place

11 Blenheim House Crown Square London

8 Blenheim House Crown Square London

33 Blenheim House Duchess Walk London

Communications Room First Floor 3 More London Place

Suite 169 First Floor 3 More London Place

Suite 166 First Floor 3 More London Place

Suite 164 First Floor 3 More London Place

37 Degrees 2B More London Riverside London

First Floor 4 More London Riverside London

43 Sandringham House Earls Way London

Sixth Floor 2 More London Riverside London

Suite 150 First Floor 3 More London Place

First Floor 2 More London Riverside London

Basement To Ninth Floor Excluding First And Second Floors And Part Of Third Floor 3 More London Place London

28 Blenheim House Crown Square London

Suite 128 First Floor 3 More London Place

Suite 115 First Floor 3 More London Place

2A More London Riverside London Southwark

Suite 142 First Floor 3 More London Place

17 Sandringham House Earls Way London

14 Sandringham House Earls Way London

Suite 139 First Floor 3 More London Place

Suite 111 First Floor 3 More London Place

Suite 106 First Floor 3 More London Place

Seventh Floor Left 2 More London
Riverside London

Suite 156 First Floor 3 More London
Place

Second Floor East 3 More London Place
London

Ground Floor 4 More London Riverside
London

Suite 178 First Floor 3 More London
Place

38 Sandringham House Earls Way
London

Cafe Parkside Kiosk 1 Weavers Lane

Suite 101B First Floor 3 More London
Place

Fulbright & Jaworski International Llp 3
More London Riverside London

44 Sandringham House Earls Way
London

33 Sandringham House Earls Way
London

22 Sandringham House Earls Way
London

Third Space Sports Medicine 2B More
London Riverside London

Suite 138 First Floor 3 More London
Place

38 Blenheim House Duchess Walk
London

15 Blenheim House Crown Square
London

Excluding First Floor And Second Floor
And Third Floor North 4 More London
Riverside London

Suite 149 First Floor 3 More London
Place

13 Hanover House Crown Square
London

316

2 Hanover House Crown Square London

Suite 144 First Floor 3 More London
Place

31 Sandringham House Earls Way
London

18 Sandringham House Earls Way
London

15 Sandringham House Earls Way
London

1 Crown Square London Southwark

Suite 121 First Floor 3 More London
Place

Suite 104 First Floor 3 More London
Place

23 Blenheim House Crown Square
London

36 Blenheim House Duchess Walk
London

Suite 180 First Floor 3 More London
Place

Suite 151 First Floor 3 More London
Place

Suite 148 First Floor 3 More London
Place

Suite 158 First Floor 3 More London
Place

29 Blenheim House Crown Square
London

Suite 105 First Floor 3 More London
Place

3 Sandringham House Earls Way
London

22 Blenheim House Crown Square
London

Suite 177 First Floor 3 More London
Place

27 Sandringham House Earls Way
London

6 Hanover House Crown Square London	37 Blenheim House Duchess Walk London
Suite 145B First Floor 3 More London Place	Suite 154 First Floor 3 More London Place
Suite 179 First Floor 3 More London Place	The Scoop The Queens Walk London
Suite 174 First Floor 3 More London Place	20 Sandringham House Earls Way London
Suite 136 First Floor 3 More London Place	Suite 109A First Floor 3 More London Place
Suite 113 First Floor 3 More London Place	Suite 173 First Floor 3 More London Place
42 Blenheim House Duchess Walk London	31 Blenheim House Crown Square London
18 Blenheim House Crown Square London	25 Blenheim House Crown Square London
27 Blenheim House Crown Square London	13 Sandringham House Earls Way London
7 Hanover House Crown Square London	4 Sandringham House Earls Way London
40 Sandringham House Earls Way London	2 Sandringham House Earls Way London
37 Sandringham House Earls Way London	Suite 182 First Floor 3 More London Place
23 Sandringham House Earls Way London	Suite 143 First Floor 3 More London Place
12 Sandringham House Earls Way London	Excluding First Floor And Second Floor 3 More London Place London
1 Sandringham House Earls Way London	Suite 155 First Floor 3 More London Place
Suite 134 First Floor 3 More London Place	Suite 152 First Floor 3 More London Place
Suite 127 First Floor 3 More London Place	4 Crown Square London Southwark
Suite 117 First Floor 3 More London Place	34 Sandringham House Earls Way London
Suite 101 First Floor 3 More London Place	25 Sandringham House Earls Way London
5 Blenheim House Crown Square London	21 Sandringham House Earls Way London

9 Sandringham House Earls Way
London

Suite 135 First Floor 3 More London
Place

Suite 124 First Floor 3 More London
Place

Suite 132 First Floor 3 More London
Place

Suite 107 First Floor 3 More London
Place

Suite 102 First Floor 3 More London
Place

16 Blenheim House Crown Square
London

9 Blenheim House Crown Square
London

Suite 176 First Floor 3 More London
Place

First Floor And Second Floor 4 More
London Riverside London

Eighth Floor 2 More London Riverside
London

Seventh Floor 2 More London Riverside
London

Bartlett Mitchell Ltd 3 More London
Riverside London

3 Blenheim House Crown Square
London

Fifth Floor 2 More London Riverside
London

Five Guys 2B More London Riverside
London

15 Hanover House Crown Square
London

Suite 129 First Floor 3 More London
Place

Second Floor 2 More London Riverside
London

10 Blenheim House Crown Square
London

Fifth Floor South East 2 More London
Riverside London

24 Blenheim House Crown Square
London

Suite 123 First Floor 3 More London
Place

24 Sandringham House Earls Way
London

Suite 141 First Floor 3 More London
Place

Suite 125 First Floor 3 More London
Place

7 Blenheim House Crown Square
London

1 Blenheim House Crown Square
London

35 Blenheim House Duchess Walk
London

21 Blenheim House Crown Square
London

Suite 162 First Floor 3 More London
Place

Unit 1 2 More London Riverside London

Part Second Floor 2 More London
Riverside London

Third Floor 2 More London Riverside
London

Seventh Floor Right 2 More London
Riverside London

11 Hanover House Crown Square
London

10 Hanover House Crown Square
London

8 Hanover House Crown Square London

39 Sandringham House Earls Way
London

32 Sandringham House Earls Way
London

6 Sandringham House Earls Way
London

Suite 126 First Floor 3 More London
Place

Suite 112 First Floor 3 More London
Place

6 Blenheim House Crown Square
London

Ctp And Osa First Floor 3 More London
Place

Suite 183 First Floor 3 More London
Place

Suite 175 First Floor 3 More London
Place

Suite 168 170 And 172 First Floor 3
More London Place

Unit 2 2 More London Riverside London

Ground Floor 3 More London Place
London

Unit 1 3 Potters Fields Park 1 Potters
Fields

London And South Eastern Railway Ltd
4 More London Riverside London

Suite 120 First Floor 3 More London
Place

Suite 108 First Floor 3 More London
Place

11 Sandringham House Earls Way
London

16 Hanover House Crown Square
London

36 Sandringham House Earls Way
London

Jhc 3 More London Riverside London

14 Hanover House Crown Square
London

41 Sandringham House Earls Way
London

19 Sandringham House Earls Way
London

10 Sandringham House Earls Way
London

Suite 103 First Floor 3 More London
Place

Suite 146B First Floor 3 More London
Place

Suite 131 First Floor 3 More London
Place

Suite 118 First Floor 3 More London
Place

4 Blenheim House Crown Square
London

40 Blenheim House Duchess Walk
London

Suite 160 First Floor 3 More London
Place

Risk Advisory 3 More London Riverside
London

Second Floor South East 3 More London
Riverside London

32 Blenheim House Crown Square
London

5 Hanover House Crown Square London

1 Hanover House Crown Square London

45 Sandringham House Earls Way
London

35 Sandringham House Earls Way
London

26 Sandringham House Earls Way
London

8 Sandringham House Earls Way
London

Suite 130 First Floor 3 More London
Place

Suite 116 First Floor 3 More London Place

Suite 114 First Floor 3 More London Place

17 Blenheim House Crown Square London

34 Blenheim House Duchess Walk London

Suite 161 First Floor 3 More London Place

Suite 159 First Floor 3 More London Place

Suite 153 First Floor 3 More London Place

1 More London Place London Southwark

Second Floor 4 More London Riverside London

Third Space Sports Medicine 2 More London Riverside London

Unit 2 Potters Fields Park Potters Fields

7 Sandringham House Earls Way London

Suite 119 First Floor 3 More London Place

Part Third Floor 3 More London Place London

Suite 110 First Floor 3 More London Place

Suite 184 First Floor 3 More London Place

Vubiquity 3 More London Riverside London

Suite 171 First Floor 3 More London Place

12 Blenheim House Crown Square London

3 Hanover House Crown Square London
First Floor 3 More London Place London

Suite 167 First Floor 3 More London Place

42 Sandringham House Earls Way London

5 Sandringham House Earls Way London

Suite 137 First Floor 3 More London Place

Suite 122 First Floor 3 More London Place

13 Blenheim House Crown Square London

Suite 146A First Floor 3 More London Place

19 Blenheim House Crown Square London

14 Blenheim House Crown Square London

2 Blenheim House Crown Square London

43 Blenheim House Duchess Walk London

41 Blenheim House Duchess Walk London

Suite 181 First Floor 3 More London Place

Suite 163 First Floor 3 More London Place

Second Floor Part 3 More London Place London

Fourth Floor 2 More London Riverside London

Second Floor West 3 More London Place London

3 Potters Fields Park Potters Fields London

39 Blenheim House Duchess Walk London

20 Blenheim House Crown Square
London

Suite 147 First Floor 3 More London
Place

Suite 109 First Floor 3 More London
Place

28 Sandringham House Earls Way
London

Suite 165 First Floor 3 More London
Place

Blenheim House Crown Square London

Suite 140 First Floor 3 More London
Place

29 Sandringham House Earls Way
London

Fifth Floor Excluding South East 2 More
London Riverside London

Unit 4 Potters Fields Park Potters Fields

30 Sandringham House Earls Way
London

16 Sandringham House Earls Way
London

12 Hanover House Crown Square
London

9 Hanover House Crown Square London

Suite 133 First Floor 3 More London
Place

Unit 3 2 More London Riverside London

Suite 157 First Floor 3 More London
Place

Part Third Floor North 4 More London
Riverside London

Norton Rose Fulbright Llp 3 More
London Riverside London

Vitality Health Ltd 3 More London
Riverside London

30 Blenheim House Crown Square
London

26 Blenheim House Crown Square
London

4 Hanover House Crown Square London

Re-consultation:

Appendix 5: Consultation responses received

Consultation and response to Pol
 LBS Transport Policy
 LBS Ecology
 LBS Design & Conservation Team [Surgery]
 LBS Archaeology
 formal consultation and response to Pol
 LBS Ecology
 LBS Urban Forester
 LBS Design & Conservation Team [Formal]
 LBS Urban Forester
 LBS Highways Development & Management
 LBS Transport Policy
 LBS Environmental Protection

formal consultation and response to Pol
 LBS Community Infrastructure Levy Team
 LBS Ecology
 LBS Transport Policy
 LBS Ecology

Statutory and non-statutory organisations

Metropolitan Police Service (Designing O
 Transport for London
 Thames Water
 Historic England

Neighbour and local groups consulted:

8 Southview House 19A Queen	London
Elizabeth Street London	Suite 205 Butler's Wharf 36 Shad
30 Eagle Wharf Court Lafone Street	Thames LONDON
London	
30 Eagle Wharf Court Lafone Street	

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PLANNING COMMITTEE (MAJOR APPLICATIONS) B

MUNICIPAL YEAR 2024-25

NOTE:

Original held in Constitutional Team; all amendments/queries to Gregory Weaver, Constitutional Team, Tel: 020 7525 3667

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