

## Planning Committee (Major Applications) A

Wednesday 4 June 2025

6.30 pm

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

### Membership

Councillor Richard Livingstone (Chair)  
Councillor Kath Whittam (Vice-Chair)  
Councillor Gavin Edwards  
Councillor Darren Merrill  
Councillor Reginald Popoola  
Councillor Catherine Rose  
Councillor Emily Tester

### Reserves

Councillor Ellie Cumbo  
Councillor Sam Dalton  
Councillor Sabina Emmanuel  
Councillor Jon Hartley  
Councillor Nick Johnson  
Councillor Michael Situ  
Councillor Cleo Soanes

---

### INFORMATION FOR MEMBERS OF THE PUBLIC

---

#### Access to information

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

#### Babysitting/Carers allowances

If you are a resident of the borough and have paid someone to look after your children, an elderly dependant or a dependant with disabilities so that you could attend this meeting, you may claim an allowance from the council. Please collect a claim form at the meeting.

#### Access

The council is committed to making its meetings accessible. For details on building access, translation, provision of signers or any other requirements for this meeting, please contact the person below.

**Contact:** Gerald Gohler on 020 7525 7420 or email: [gerald.gohler@southwark.gov.uk](mailto:gerald.gohler@southwark.gov.uk)

---

Members of the committee are summoned to attend this meeting

**Althea Loderick**

Chief Executive

Date: 22 May 2025



## Planning Committee (Major Applications) A

Wednesday 4 June 2025

6.30 pm

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

### Order of Business

Item No.	Title	Page No.
1.	<b>APOLOGIES</b>	
	To receive any apologies for absence.	
2.	<b>CONFIRMATION OF VOTING MEMBERS</b>	
	A representative of each political group will confirm the voting members of the committee.	
3.	<b>NOTIFICATION OF ANY ITEMS OF BUSINESS WHICH THE CHAIR DEEMS URGENT</b>	
	In special circumstances, an item of business may be added to an agenda within five clear days of the meeting.	
4.	<b>DISCLOSURE OF INTERESTS AND DISPENSATIONS</b>	
	Members to declare any personal interests and dispensation in respect of any item of business to be considered at this meeting.	
5.	<b>MINUTES</b>	1 - 7
	To approve as a correct record the minutes of the meeting held on 29 April 2025.	
6.	<b>DEVELOPMENT MANAGEMENT</b>	8 - 12
	<b>6.1. AYLESBURY ESTATE SITE PHASE 2B - LAND BOUNDED BY THURLOW STREET, ALBANY ROAD, KINGLAKE STREET AND BAGSHOT STREET</b>	13 - 166

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

**Item No.**

**Title**

**Page No.**

**EXCLUSION OF PRESS AND PUBLIC**

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

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

Date: 22 May 2025



## 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. **As meetings are usually livestreamed, speakers should not disclose any information they do not wish to be in the public domain.**
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](mailto:ConsTeam@southwark.gov.uk) in advance of the meeting by **5pm** on the working day preceding the meeting.

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

**Contacts:** General Enquiries  
Planning Section  
Resources  
Tel: 020 7525 5403

Planning Committee Clerk, Constitutional Team  
Governance and Assurance  
Tel: 020 7525 7420



## Planning Committee (Major Applications) A

MINUTES of the Planning Committee (Major Applications) A held on Tuesday 29 April 2025 at 6.30 pm at Ground Floor Meeting Room G02 - 160 Tooley Street, London SE1 2Q

---

**PRESENT:** Councillor Richard Livingstone (Chair)  
Councillor Kath Whittam (Vice-Chair)  
Councillor Gavin Edwards  
Councillor Esme Hicks  
Councillor Nick Johnson  
Councillor Darren Merrill  
Councillor Reginald Popoola

**OFFICER SUPPORT:** Colin Wilson (Assistant Director Strategic Development)  
Claire Nevin (External Legal Counsel, FTB Chambers)  
Dipesh Patel (Head of Planning, Strategic Applications)  
Michael Tsoukaris (Manager Design and Conservation)  
Rob Davies (Team Leader, Transport Planning)  
Gemma Usher (Team Leader, Planning)  
Gerald Gohler (Constitutional Officer)

### 1. APOLOGIES

There were none.

### 2. CONFIRMATION OF VOTING MEMBERS

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

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

The chair drew members' attention to the main agenda pack and supplemental agenda pack No.1, as well as the members' pack and addendum report which

constitute supplemental agenda pack No.2, all of which had been circulated before the meeting.

#### 4. **DISCLOSURE OF INTERESTS AND DISPENSATIONS**

The following members declared an interest in item:

##### **7.1 Unit 1 And 4 Canada Water Retail Park Surrey Quays Road, London, SE16 2XU**

Councillor Kath Whittam, non-pecuniary, as the application was in her ward and she had had discussions with the applicant, but had not expressed an opinion.

##### **7.2. Unit 1 And 4 Canada Water Retail Park (formerly known as Canada Water Sites C And E) Surrey Quays Road, London, SE16 2XU (Deed of Variation to a s106 Agreement)**

Councillor Kath Whittam, non-pecuniary, as the application was in her ward and she had had discussions with the applicant, but had not expressed an opinion.

#### 5. **MINUTES**

That the minutes for the Planning Committee (Major Applications) A meeting held on 26 March 2025 be approved as a correct record and signed by the chair.

#### 6. **BOROUGH TRIANGLE (18-54 NEWINGTON CAUSEWAY, 69 BOROUGH ROAD, 82-83 BOROUGH ROAD, LONDON) - BUSINESS RELOCATION STRATEGY S106 OBLIGATION**

**Report:** see pages 1 To 11 of the supplemental agenda pack No.1 and pages 1 to 8 of the supplemental agenda pack No.2

The officer introduced the report and responded to questions put by members of the committee.

The chair explained that for an item such as this the committee would normally not hear contributions from members of the public, however, on this occasion he had decided to allow representatives of the traders affected by the business relocation strategy, and the applicant, to address the committee in two three-minute slots.

The spokespersons for the traders addressed the committee and responded to questions put by members of the committee concerning the content of the business relocation strategy.

The applicant's representatives addressed the committee and answered questions

put by members of the committee concerning the content of the business relocation strategy.

**RESOLVED:**

That the wording of the Business Relocation Strategy in the s106 legal agreement set out in Appendix A of the report and the addendum report be agreed, with the following further amendments:

- That rents at the temporary food market will be set at the same level as currently in Mercato, based on a percentage of monthly revenue, but with no minimum rent applied and fixed at that level for the duration of the trader's stay in the temporary market facility.
- That the temporary food market will be codesigned with traders in fortnightly meetings.
- That individual traders can join the regular meetings with the independent business advisor and applicant.
- That in five years' time, if any traders in the temporary facility cannot be supported in the newly-built food market facilities, these traders will receive payments from the business relocation fund (by means of a top-up fund paid for by the applicant, if the original business relocation monies have been used up) which are equivalent to those received by traders not relocating to the temporary structure (£12,500 per trader). These traders who cannot move from the temporary to the newly-built facilities will also be receiving relocation advice including potential new sites through the independent business advisor.
- That applications for spaces in the temporary market need to be received ten months before the closing date of the current market facilities, with notifications about the success of the application having to be communicated to applicants at the latest eight months before the closing date of the current market facilities.

**7. DEVELOPMENT MANAGEMENT**

The committee considered the report.

**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.

## 7.1 UNIT 1 AND 4 CANADA WATER RETAIL PARK SURREY QUAYS ROAD, LONDON, SE16 2XU

**Planning Application Number:** 24/AP/3718

**Report:** see pages 11 to 292 of the agenda pack and pages 8 to 11 of the supplemental agenda pack No.2

### **PROPOSAL:**

*Demolition of all buildings and structures and the comprehensive redevelopment of the site to provide the following new development:*

- *Plot A, erection of two new commercial buildings (A1 and A2) to provide offices (Class E(g)) with retail/food and drink/professional services (E(a/b/c)) with a shared basement, servicing, parking and other ancillary accommodation.*
- *Plot B, erection of two new buildings to provide in Building B1, purpose-built student accommodation (sui generis) with community use (F2), in Building B2, residential (C3) with retail/food and drink (E(a/b)); with basements, servicing, parking and other ancillary accommodation*
- *Together with provision of cycle parking, Blue Badge Parking, works of hard and soft landscaping, replacement of trees and planting of new trees; new vehicular access points from Surrey Quays Road and Canada Street, along with other incidental works.*

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

There were no spokespersons for the objectors present and wishing to speak.

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

There were no supporters living within 100 metres of the development site present and wishing to speak.

There were no ward councillors wishing to address the committee in their capacity as ward councillors.

Members of the committee put further questions to officers and discussed the application.

Councillors asked for the student management plan to also cover any potential issues arising externally within the vicinity of the site.

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

### **RESOLVED**

1. That planning permission be granted subject to conditions set out in the report and addendum report, referral to the Mayor of London and the applicant entering into an appropriate legal agreement; and
2. That the director of planning and growth be authorised under delegated authority to make any minor modifications to the proposed conditions arising out of detailed negotiations with the applicant, which may necessitate further modification and may include the variation, addition, or deletion of the conditions as drafted; and
3. 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
4. That following the issue of planning permission, the director of planning and growth write to the Secretary of State notifying them of the Decision, pursuant to Regulation 30(1)(a) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017; and
5. That following issue of planning permission, the director of planning and growth place a statement on the Statutory Register pursuant to Regulation 28(1) of the TCP (EIA) Regulations 2017, which contains the information required by Regulation 28 and, for the purposes of Regulation 28(1)(h) being the main reasons and considerations on which the Planning Committee's decision was based shall be set out in the report; and
6. That, in the event that the requirements of (1) are not met by 31 December 2025, the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 515 of this report; and
7. That the planning committee in making their decision has due regard to the potential Equalities impacts that are outlined in this report.

**7.2 UNIT 1 AND 4 CANADA WATER RETAIL PARK (FORMERLY KNOWN AS CANADA WATER SITES C AND E) SURREY QUAYS ROAD, LONDON, SE16 2XU (DEED OF VARIATION TO A S106 AGREEMENT)**

**Planning Application Number:** 25/AP/0738 (Deed of Variation to a s106 Agreement)

**Report:** see pages 293 to 302 of the agenda pack and pages 11 and 12 of supplemental agenda pack No.2

**PROPOSAL:**

*Deed of Variation to the s106 legal agreement signed as part of application 12/AP/4126 (as amended under applications 17/AP/3694, 16/AP/0200, 15/AP/2821) and a further Deed of Variation dated 18 January 2023 in relation to amending payment triggers for the Additional Affordable Housing Payment.*

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

There were no spokespersons for the objectors present and wishing to speak.

The applicant's representatives did not wish to make a statement to the committee, but offered to respond to questions put by members of the committee of which there were none.

There were no supporters living within 100 metres of the development site present and wishing to speak.

There were no ward councillors wishing to address the committee in their capacity as ward councillors.

Members of the committee put further questions to officers and discussed the application.

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

**RESOLVED**

That the delegated authority to negotiate and complete a Deed of Variation to the legal agreement signed as part of planning consent 12/AP/4126 (as amended by 17/AP/3694, 16/AP/0200, 15/AP/2821 and a further Deed of Variation dated 18 January 2023) to the director of planning and growth be

agreed.

The meeting ended at 8.42pm.

**CHAIR:**

**DATED:**

<b>Meeting Name:</b>	Planning Committee (Major Applications) A
<b>Date:</b>	4 June 2025
<b>Report title:</b>	Development Management
<b>Ward(s) or groups affected:</b>	All
<b>Classification:</b>	Open
<b>Reason for lateness (if applicable):</b>	Not applicable
<b>From:</b>	Proper Constitutional Officer

## RECOMMENDATIONS

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

## BACKGROUND INFORMATION

4. The council's powers to consider planning business are detailed in Part 3F which describes the role and functions of the planning committees. The matters reserved to the planning committees exercising planning functions are described in part 3F of the Southwark Council constitution.

## KEY ISSUES FOR CONSIDERATION

5. In respect of the attached planning committee items members are asked, where appropriate:
  - a. To determine those applications in respect of site(s) within the borough, subject where applicable, to the consent of the Secretary of State for Levelling Up, Housing and Communities and any directions made by the Mayor of London.

- b. To give observations on applications in respect of which the council is not the planning authority in planning matters but which relate to site(s) within the borough, or where the site(s) is outside the borough but may affect the amenity of residents within the borough.
  - c. To receive for information any reports on the previous determination of applications, current activities on site, or other information relating to specific planning applications requested by members.
6. Each of the following items are preceded by a map showing the location of the land/property to which the report relates. Following the report, there is a draft decision notice detailing the officer's recommendation indicating approval or refusal. Where a refusal is recommended the draft decision notice will detail the reasons for such refusal.
  7. Applicants have the right to appeal to Planning Inspector against a refusal of planning permission and against any condition imposed as part of permission. Costs are incurred in presenting the council's case at appeal which maybe substantial if the matter is dealt with at a public inquiry.
  8. The sanctioning of enforcement action can also involve costs such as process serving, court costs and of legal representation.
  9. Where either party is felt to have acted unreasonably in an appeal the inspector can make an award of costs against the offending party.
  10. All legal/counsel fees and costs as well as awards of costs against the council are borne by the budget of the relevant department.

### **Community impact statement**

11. Community impact considerations are contained within each item.

### **SUPPLEMENTARY ADVICE FROM OTHER OFFICERS**

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

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

13. A resolution to grant planning permission subject to legal agreement shall mean that the director of planning and growth is authorised to issue a planning permission subject to the applicant and any other necessary party entering into a written agreement in a form of words prepared by the assistant chief executive – governance and assurance, and which is satisfactory to the director of planning and growth. Developers meet the council's legal costs of such agreements. Such an agreement shall be entered into under section 106 of the Town and Country Planning Act 1990 or under another appropriate enactment as shall be determined by the assistant chief executive – governance and assurance. The planning permission will not be issued unless such an agreement is completed.
14. Section 70 of the Town and Country Planning Act 1990 as amended requires the council to have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations when dealing with applications for planning permission.
15. Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that where, in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise. The development plan is currently the Southwark Plan which was adopted by the council in February 2022. The Southwark Plan 2022 was adopted after the London Plan in 2021. For the purpose of decision-making, the policies of the London Plan 2021 should not be considered out of date simply because they were adopted before the Southwark Plan 2022. London Plan policies should be given weight according to the degree of consistency with the Southwark Plan 2022.
16. The National Planning Policy Framework (NPPF), as amended in July 2021, is a relevant material consideration and should be taken into account in any decision-making.
17. Section 143 of the Localism Act 2011 provides that local finance considerations (such as government grants and other financial assistance such as New Homes Bonus) and monies received through CIL (including the Mayoral CIL) are a material consideration to be taken into account in the determination of planning applications in England. However, the weight to be attached to such matters remains a matter for the decision-maker.
18. "Regulation 122 of the Community Infrastructure Levy regulations (CIL) 2010 as amended, provides that "a planning obligation may only constitute a reason for granting planning permission if the obligation is:
  - a. necessary to make the development acceptable in planning terms;
  - b. directly related to the development; and
  - c. fairly and reasonably related to the scale and kind to the development.

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

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

## BACKGROUND DOCUMENTS

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

## APPENDICES

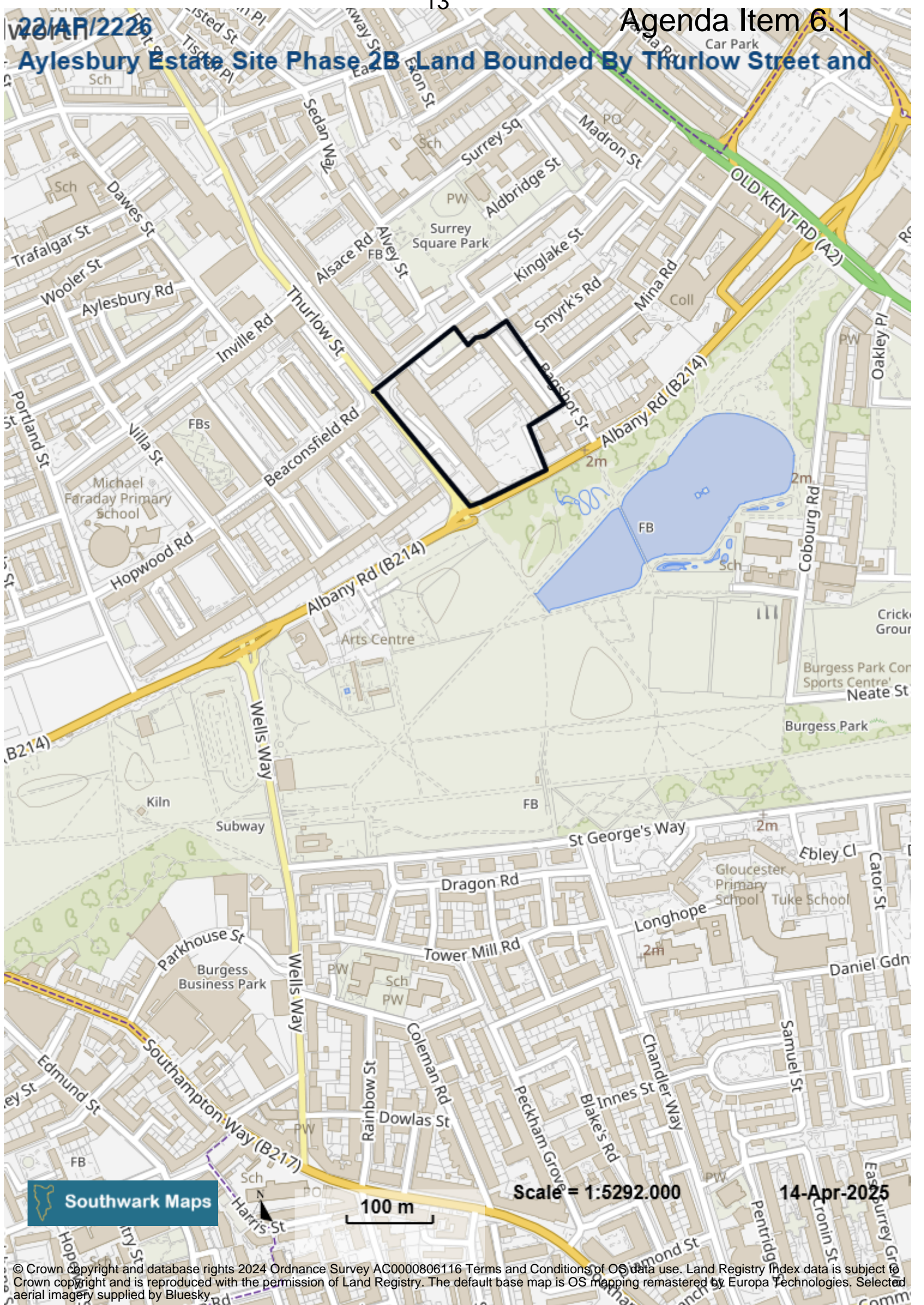
No.	Title
None	

**AUDIT TRAIL**

<b>Lead Officer</b>	Chidilim Agada, Head of Constitutional Services	
<b>Report Author</b>	Alex Godinet, Lawyer, Finance and Governance Gerald Gohler, Constitutional Officer	
<b>Version</b>	Final	
<b>Dated</b>	22 May 2025	
<b>Key Decision?</b>	No	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>		
<b>Officer Title</b>	<b>Comments sought</b>	<b>Comments included</b>
Assistant Chief Executive – Governance and Assurance	Yes	Yes
Director of Planning and Growth	No	No
<b>Cabinet Member</b>	No	No
<b>Date final report sent to Constitutional Team</b>		22 May 2025

23/04/2025

# Aylesbury Estate Site Phase 2B Land Bounded By Thurlow Street and



Southwark Maps

100 m

Scale = 1:5292.000

14-Apr-2025

© Crown copyright and database rights 2024 Ordnance Survey AC0000806116 Terms and Conditions of OS data use. Land Registry Index data is subject to Crown copyright and is reproduced with the permission of Land Registry. The default base map is OS mapping remastered by Europa Technologies. Selected aerial imagery supplied by Bluesky

## Contents

EXECUTIVE SUMMARY .....	3
BACKGROUND INFORMATION .....	5
Details of proposal .....	12
Planning history of the site and adjoining or nearby sites. ....	18
KEY ISSUES FOR CONSIDERATION .....	19
Summary of main issues.....	19
Legal context .....	19
Planning policy.....	20
ASSESSMENT.....	21
Environmental impact assessment .....	21
Principle of the proposed development in terms of land use.....	22
Design quality .....	37
Impact of proposed development on amenity of adjoining occupiers and surrounding area.....	59
Noise and vibration .....	71
Energy and sustainability .....	82
Planning obligations (S.106 agreement) .....	87
Mayoral and borough community infrastructure levy (CIL).....	90
Community involvement and engagement.....	90
Community impact and equalities assessment .....	95
Human rights implications.....	96
Positive and proactive statement .....	96
Positive and proactive engagement: summary table.....	97
CONCLUSION .....	97
APPENDICES .....	99
AUDIT TRAIL .....	99

<b>Meeting Name:</b>	Planning Committee (Major Applications) A
<b>Date:</b>	4 June 2025
<b>Report title:</b>	<p><b>Development Management planning application:</b> Application 22/AP/2226 for: Full Planning Application</p> <p><b>Address:</b> Aylesbury Estate Site Phase 2B - Land Bounded By Thurlow Street, Albany Road, Kinglake Street and Bagshot Street</p> <p><b>Proposal:</b> Demolition of the existing buildings and redevelopment to provide a mixed use development comprising five buildings ranging in height from 5 to 26 storeys with basements, providing a total of 640 new homes (Class C3); flexible floorspace for commercial business and service uses (Class E) and local community and learning uses (Class F1/F2(a)(b) public open space and playspace private and communal amenity space formation of new accesses and routes within the site alterations to existing accesses; and associated car and cycle parking; refuse storage and hard and soft landscaping; and associated works.</p> <p>For Information, this is an AMENDED SCHEME, from the scheme that the Committee were previously minded to approve on 17January 2023, the amendments include the following:</p> <ul style="list-style-type: none"> <li>- Increase of 26 units, bringing the overall total to 640 homes;</li> <li>- Additional one-storey to 4 buildings to accommodate for the additional residential units (the height range of will remain within the 5-26 storey range); and</li> <li>- Changes to the internal layout, including the removal of one building core and the incorporation of two stairs to 4 building cores, to ensure compliance with fire safety regulations.</li> </ul> <p>Additional and amended documents have been provided to support the above amendments.</p> <p>The application is accompanied by an Environmental Statement and associated addendum submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.</p>
<b>Ward(s) or groups affected:</b>	Faraday

<b>Classification:</b>	Open
<b>From:</b>	Director of Planning and Growth
<b>Application Start Date:</b> 21.07.2022	<b>Application Expiry Date:</b> 20.10.2022
<b>Earliest Decision Date:</b> 13.10.2022	<b>PPA Date:</b> TBC

## RECOMMENDATIONS

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 the environmental information be taken into account as required by Regulation 26(1) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended); and
3. That the planning committee in making their decision has due regard to the potential Equalities impacts that are outlined in this report; and
4. That following the issue of planning permission, the director of planning and growth write to the Secretary of State notifying them of the decision, pursuant to Regulation 30(1)(a) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017; and
5. That following issue of planning permission, the director of planning and growth place a statement on the Statutory Register pursuant to Regulation 28(1) of the TCP (EIA) Regulations 2017, which contains the information required by Regulation 28 and, for the purposes of Regulation 28(1)(h) being the main reasons and considerations on which the planning committee's decision was based shall be set out in the report; and
6. That in the event that the requirements of (1) are not met by 30 September 2025, that the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reasons set out in Paragraph 369 of this report.

## EXECUTIVE SUMMARY

7. This application is for the redevelopment of Phase 2B of the Aylesbury Estate to provide a significant number of new private and affordable homes. The redevelopment would provide 640 new homes with 50% affordable housing on a 75:25 split between social rented and intermediate.
8. The proposed new homes would meet or exceed the quality standards set out in policy and there would be a high proportion of dual aspect homes. All play space would be provided on site and generous new public spaces would be

provided.

9. Carbon emissions would be reduced by 65% above the building regulations which is well in excess of the 35% required by policy and a financial contribution would be secured to achieve net carbon zero status. The development would make use of air source heat pumps to deliver these on-site savings.
10. The development would not have a significant impact on existing nearby residents in terms of daylight/sunlight, overlooking, loss of privacy or loss of outlook. Emerging schemes in the area have also been considered and the proposed development would have no detrimental impact on the new developments approved on the adjacent sites.
11. Whilst the height and scale of the proposals exceed the heights identified in the parameter plans consented under the OPP, the height, scale and massing of the buildings responds positively to the existing and emerging character of the area, as well as the expectations of the OPP and would have no adverse impact on adjacent heritage assets. The development is high quality in terms of design and architecture. The proposed materials are robust, contextual and would ensure a quality finish befitting of this important location adjacent to Burgess Park and a prominent site within the Aylesbury Regeneration Area.
12. Transport impacts would be limited, and the development would contribute to transport improvements in the area including contributions towards bus improvements, cycle hire and highways improvements.
13. The proposals would provide the following:

Homes	Private Homes	Private HR.	Aff. SR Homes	Aff. SR HR	Aff. Int Homes	Aff. Int HR	Homes Total (% of total)	HR Total
1-Bed	156	316	32	66	32	65	220 (34.3%)	447
2-Bed	208	645	53	208	57	201	318 (49.69%)	1054
3-Bed	14	65	28	137	-	-	42 (6.56%)	202
4-Bed	-	-	49	288	-	-	49 (7.66%)	288
5-Bed	-	-	11	77	-	-	11 (1.72%)	77
<b>Total and % of total</b>	<b>378 59%</b>	<b>1026 49.61%</b>	<b>173 27.03%</b>	<b>776 37.52%</b>	<b>89 13.91%</b>	<b>266 12.86 %</b>	<b>640 100%</b>	<b>2068 100%</b>

	Existing sqm	Proposed sqm	Change +/-
Public Open Space	7,046sqm	3,700sqm	-3,346sqm
Play Space	0sqm	3,314.1sqm	+3,314.1sqm
Communal Amenity Space	0sqm	4,275sqm	+4,275sqm

CO2 savings beyond part L Building Regulations	65%
Trees lost	28
Trees Gained	130

	Existing	Proposed	Change +/-
Urban Greening Factor	N/A	0.393	+0.393
Greenfield Run off rate	713.8 l/s for 1 in 100 yr	35.2 l/s for 1 in 100	-678.4 l/s
Green/Brown roofs	0	3,421sqm	+3,421sqm
EVCPS	0	16	+16
Cycle parking spaces	0	1395	+1395
Disabled parking spaces	0	31	+31

SCIL (estimated)	£1,727,944.99
MCIL (estimated)	£1,661,260.85
S106	£1,031,160 (£1,672,510 should construction jobs not be provided).

## BACKGROUND INFORMATION

14. In August 2015 the council granted Outline Planning Permission (OPP) under application 14/AP/3844, for the comprehensive redevelopment of the Aylesbury Estate in line with the requirements of the development plan and the aspirations of the Aylesbury Area Action Plan (AAP). This approval was for the phased redevelopment of the estate to provide a mixed-use development of up to 2,745 residential units, employment, retail and community floor space. The Outline Planning Permission created the framework to transform the Aylesbury Estate through the demolition of the existing poor-quality housing and redevelopment to provide high quality mixed tenure housing, public open spaces and new community/workspaces all clearly linked into the surrounding streets, helping to create a sustainable and inclusive neighbourhood.
15. The initial phases of the regeneration of the Estate have commenced following the grant of outline permission for the wider estate. The OPP was approved alongside a detailed planning application (reference 14/AP/3843) to redevelop the site bounded by Portland Street; Albany Road; Westmoreland Road; and Bradenham Close, known as the First Development Site (FDS). The FDS represents the first phase of the comprehensive regeneration of the Aylesbury Estate (known as the Aylesbury Regeneration) and would provide up to 902 homes.
16. A previous iteration of this application was present to members on 17 January 2023, where members resolved to grant permission subject to the signing of a

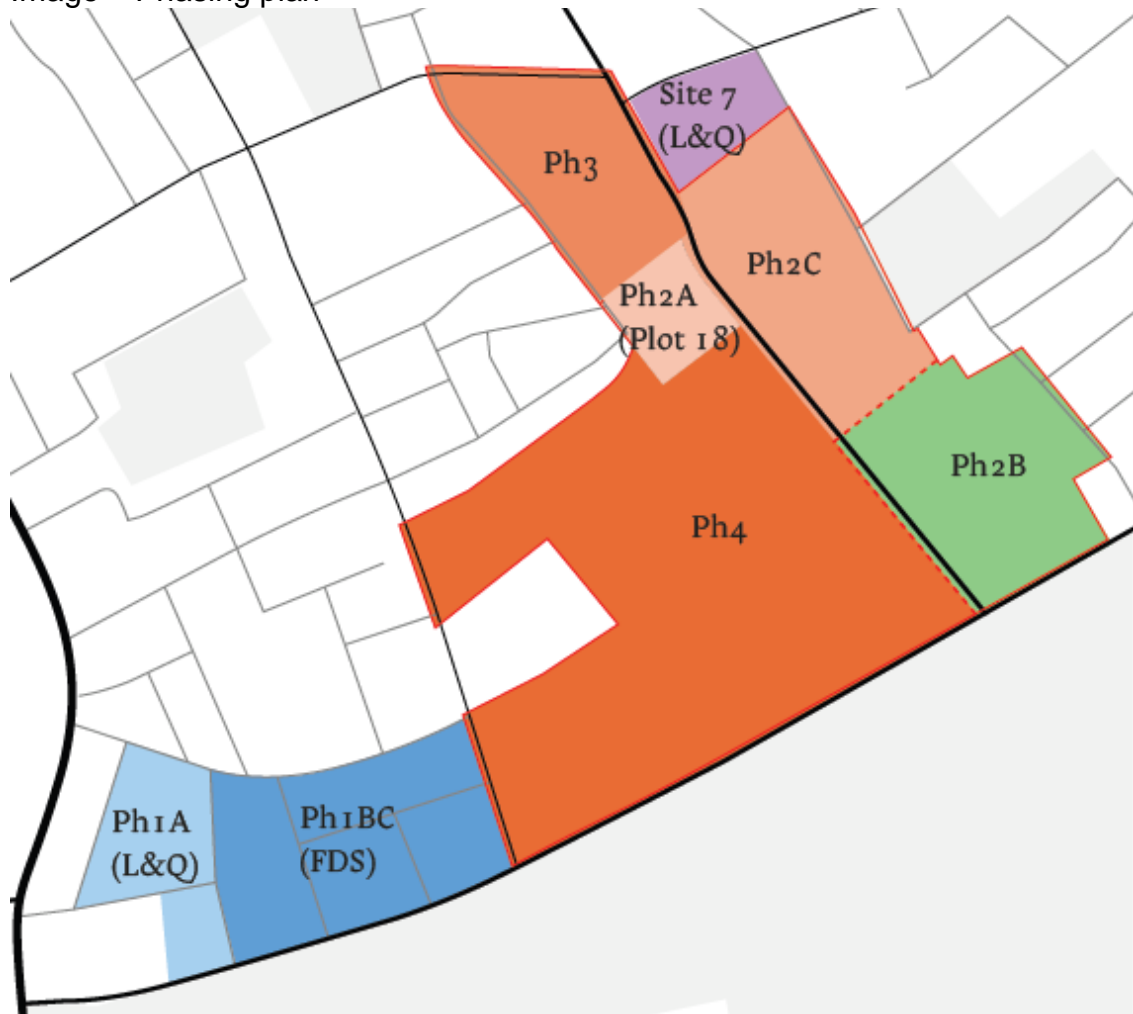
legal agreement and referral to the GLA.

17. Following the committee, the applicants and officers worked to progress the S.106 legal agreement ahead of the GLA Stage 2 referral process.
18. Prior to a formal decision being issued on the application, further changes to fire safety guidance were announced by the Government in July 2023, the most significant of which was a requirement for buildings over 18m to include two stair cores as well as limitations on escape distances. The GLA confirmed that all schemes being referred to Stage 2 would need to accord with the updated guidance. This significantly affected Aylesbury Phase 2B and it was concluded that design changes would be required for the scheme to progress further. Due to the period of time elapsed since the application was submitted in June 2022, other regulatory and guidance changes had also occurred which the design update would need to address, including:
  - An update to Approved Document Part L - Conservation of fuel and power;
  - The introduction of Approved Document Part O – Overheating; and
  - GLA Energy Assessment Guidance.
19. This revised planning application update addresses the various changes in regulations and guidance via amendments to the proposed scheme.
20. A non-material amendment application (23/AP/0062) was submitted alongside the previous submission to amend the OPP and approved in March 2023. However, the decision to grant the S.96A application was challenged and went through a judicial review. In January 2024, the High Court quashed the s96A permission.
21. The principle of the case itself concerned whether the insertion of the word 'severable' into the description of development for a large outline scheme was 'non-material' and could therefore be done under Section 96A of the Town and Country Planning Act. The question for the Court was essentially whether the original proposal was already severable (meaning the proposed amendment to the description would be non-material) or whether the permission was not severable (in which case the amendment would be material). The court resolved to quash the original decision as the alterations were considered by the court to be material.
22. The OPP granted permission to the principle of the proposal including the upper and lower limits of development and the areas where new access points will be situated. The purpose was to move towards a more detailed outline planning permission that covers specific elements at a later stage. These later stages are called 'reserved matters' and in the case of the OPP they included:
  - Access
  - Appearance
  - Landscaping
  - Layout

- Scale

23. The OPP divided the site into development phases (Phase 2A, 2B, 2C, 3 and 4). Phase 2A, known as Plot 18, was the first phase of the OPP to commence development and reserved matters were approved in December 2016 under planning reference 16/AP/2800. This approval was for 122 residential units (C3), retail (A1/A3/A4) and a community facility (library D1) in a part 15, part 7 and part 4/6 storey building known as the North Block. The approval also included a health centre (D1) and early years facility (D1) in a 4 storey (plus basement) building known as the South Block.

Image – Phasing plan



24. Development plan policy has changed significantly since the approval of the OPP through the adoption of the London Plan 2021 and the Southwark Plan 2022. Furthermore, Southwark's housing delivery targets are likely to increase in 2025, following changes to the NPPF in December 2024, adding pressures to Southwark to deliver more housing within the borough.
25. The applicant considers that there are a number of issues that compromise the ability to successfully deliver the proposals for this phase as previously conceived in the OPP. These include, the updated fire safety requirements, and both the deliverability of the phases within the masterplan (in terms of the speed at which construction can commence) and the policy requirement for the

re-provision of existing affordable floorspace, which cannot be accommodated within the approved masterplan parameters (such as scale, height and massing).

26. As such the current application is a standalone planning application as opposed to a reserved matters application and is submitted in full detail and separate to the OPP despite being located within the masterplan area. The OPP assumed that an indicative provision of approximately 490 residential units and 3,900 sqm of public open space would be delivered on Phase 2B.
27. Whilst the application is submitted as a standalone application, reference will be made throughout the report, to the OPP which remains a material consideration.

### **Effect on the Outline Planning Permission (OPP)**

28. The Supreme Court recently gave judgment in the Hillside case. The Hillside Judgement considered the relationship between successive grants of planning permission for development on the same land, and about the effect of implementing successive planning permissions on land on which an existing planning permission had already been granted. The issue in question was whether it was possible to rely on and further develop out a planning permission (A) if development had been carried out pursuant to a subsequent planning permission (B) on the same site. The judgement confirmed the following:
  - It is generally possible to implement two (or more) permissions for the same site provided that works carried out pursuant to one permission (A) do not render it physically impossible to carry out the development authorised by the other permission (B).
  - A planning permission (A) does not authorise development if as a result of carrying out of development pursuant to a planning permission (B) it becomes physically impossible to carry out the development in respect of planning permission (A).
  - The test of physical impossibility is subject to any inconsistencies between planning permission (A) and planning permission (B) being material.
  - Where physical impossibility exists, the reason why further development carried out in reliance on the permission (A) is not permitted is simply that the development is not authorised by the terms of the permission (A), with the result that it does not comply with section 57(1) of the Town & Country Planning Act 1990.
  - An exception to physical impossibility principle is where planning permission A contains clear express provision making parts of the development authorised by planning permission A severable from other parts of the development authorised by planning permission A. The Hillside Judgement mentions this concept only briefly and does not specifically consider the position with phased outline permissions.
29. In the context of Aylesbury the main issue for consideration would be if the OPP could still be fulfilled in the context of a “drop in” application on Phase 2B

being approved.

30. The original permission in Hillside was a detailed planning permission where the development form was specifically set out in the plans approved as part of that original planning permission. The subsequent implementation of the later permissions, led to development being constructed in positions where it made the earlier development approved by the original planning permission physically incapable of being carried out.
31. The applicants previously submitted a S96A non-material amendment application (23/AP/0062) in order to formalise the severable nature of the OPP. This NMA application was subsequently approved by the London Borough of Southwark, however it was challenged via a Judicial Review to the High Court - R (Dennis) v LB Southwark [2024].
32. The principle of the case itself concerned whether the insertion of the word 'severable' into the description of development for a large outline scheme was 'non-material' and could therefore be done under Section 96A of the Town and Country Planning Act. The question for the Court was essentially whether the original proposal was already severable (meaning the proposed amendment to the description would be non-material) or whether the permission was not severable (in which case the amendment would be material). The court resolved to quash the original decision as the alterations were considered by the court to be material.
33. The council's policy position on the redevelopment of the Aylesbury Estate is set out in the Southwark Plan specifically in the "Aylesbury Area Vision", AV.01 and in site allocation NSP01 "Aylesbury Area Action Core" and in the relevant development management policies. Neither the Southwark Plan nor the London Plan policy require the estate redevelopment to be delivered through the mechanism of an Outline Planning Permission. NSP01 notes that the OPP and reserved matters planning applications are relevant to this site.. The site allocation diagram matches the phasing of the OPP. The design and accessibility guidance says " "Redevelopment will come forward in four phases as indicated in the site allocation." Paragraph 3.3.20 of the reasoned justification of policy D3 of the London Plan notes that "Masterplans and strategic frameworks should be used when planning large scale development to create welcoming and inclusive neighborhoods...." The Southwark Plan provides the relevant strategic framework. The Approved masterplan within the OPP is relevant for the site. This report considers the application within the context of that framework, and taking into account what was approved by the OPP. By the terms of NSP01, the OPP is relevant to planning decisions for the site (whether or not it remains extant). There is no statutory or policy requirement to have regard to any incompatibility, or consequences of incompatibility between this application and the OPP. As such, that subject is not considered further in this report

### **Site location and description**

34. The application site measures approximately 2.72 hectares and occupies the space allocated as Phase 2B of the Aylesbury Estate Regeneration and the

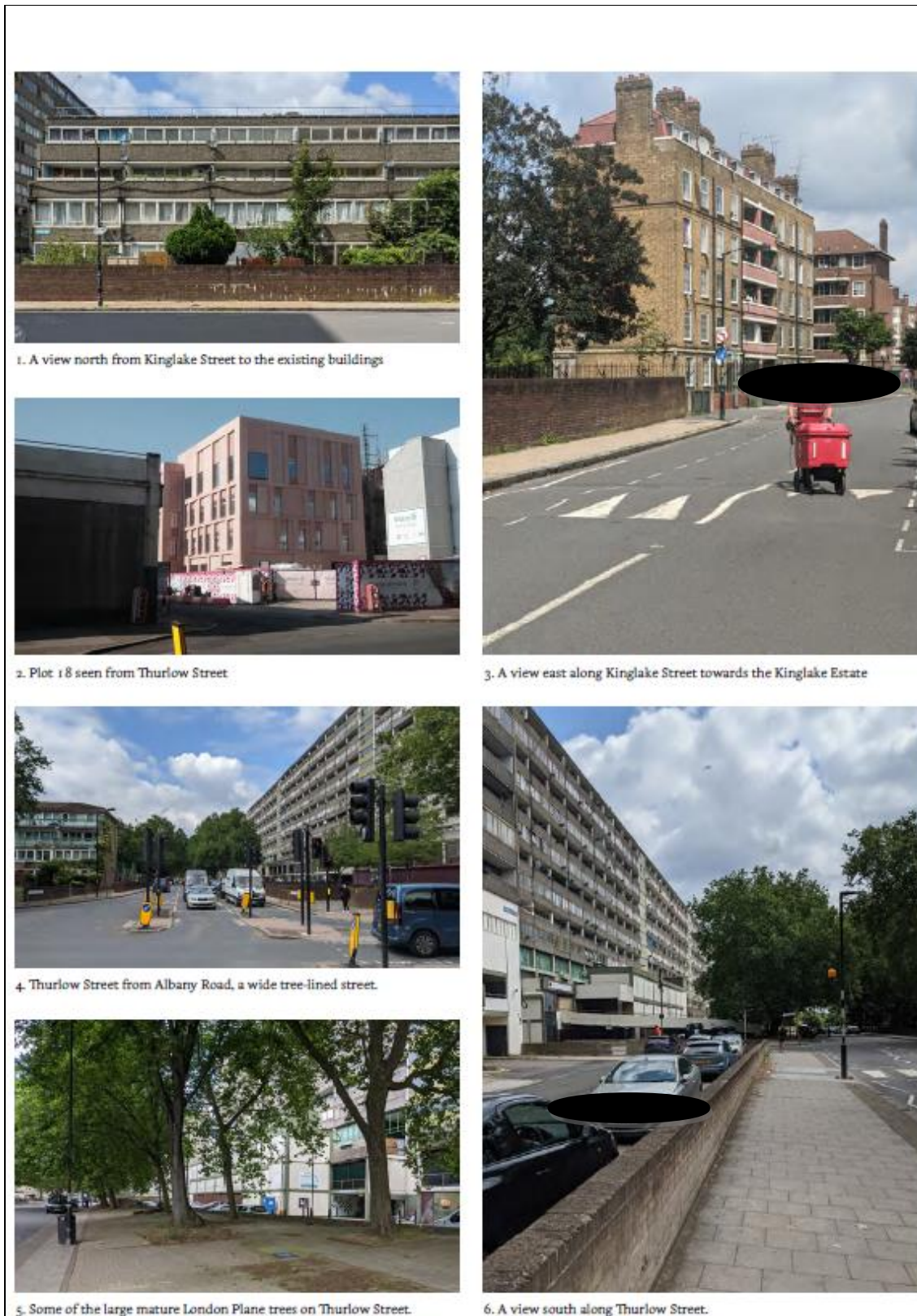
OPP. The site has frontages onto Kinglake Street to the north, Bagshot Street to the east, Albany Road to the south and Thurlow Street to the west. There are currently four linear housing blocks on the site that range in height from six to 14 storeys. These blocks are Padbury, Ravenstone, Wendover and Winslow. All blocks are residential in nature although Wendover accommodates a Learning Centre, music room and some ancillary offices.

Site location:



35. There are 373 existing dwellings on the site, of which 327 are social rented, and there is approximately 529sqm of public open space. Of the 373 existing homes on site, the majority of homes are vacant with the council in the process of rehousing residents within the FDS.
36. The majority of the site has a Public Transport Accessibility (PTAL) rating of 4 and is a sustainable location. There are a number of bus stops along Thurlow Street and Albany Road which lie adjacent to the site. The site is located approximately 1.2 miles east of Kennington Underground station (Northern line), and approximately 1 mile to the south of Elephant & Castle Underground Station (Bakerloo and Northern lines) and Elephant and Castle Rail Station (Thameslink). Thurlow Street has been identified as forming part of the Southwark Spine cycle route which is being delivered by the council.

## Images of application site



## Surrounding area

37. The Aylesbury Estate lies directly to the north of Burgess Park which is designated as a Site of Importance for Nature Conservation (SINC) and

Metropolitan Open Land (MOL). The park contains many facilities including restaurants, leisure (tennis courts and BMX track), lake and amenity/play spaces. Approximately 135 metres to the north/northeast of the site is Surrey Square Park which is designated as a SINC and Borough Open Land.

38. The surrounding area is predominantly residential in nature, with buildings ranging from two to ten storeys in height. There are some retail units on Bagshot Street and further retail to the north on East Street. Larger retail facilities are provided on Old Kent Road to the east and Walworth Road to the west.
39. Sharing a boundary with the southeast corner of the site is the Approved Premises Facility which replaces a similar facility on the site of the FDS, known as Ellison House, which was relocated to allow redevelopment of the FDS to take place.

### **Details of proposal**

40. Planning consent is sought for the demolition of the existing buildings and redevelopment to provide a mixed-use development. The development would comprise five buildings that would range in height from five to 26 storeys (with basements). This would provide a total of 640 new homes (Class C3); flexible floorspace for commercial business and service uses (Class E) and local community and learning uses (Class F1/F2(a)(b)).

### **Proposed site layout**

41. The main boundaries of the site would be Albany Road, Bagshot Street, Kinglake Street and Thurlow Street. The site would then be divided laterally by Mina Road and medially by Alvey Street and Heywood Street. Two new open spaces would be created, Thurlow Square fronting Thurlow Street and Bagshot Park located on the eastern site boundary on Bagshot Street. Bagshot Park would accommodate a new MUGA.



42. The applicant has developed the proposal based upon the following design principles:

- Heights: A range of building heights are proposed across the site, ranging from 5 to 26 storeys. The tallest building is located on the corner of Albany Road and Thurlow Street as a gateway building next to Burgess Park.
- Typologies: The proposal will incorporate a mixture of maisonettes and flats, with a total of 127 maisonettes and 513 flats. The maisonettes will either be two or three-storey dwellings with front doors accessed directly from the street or from a communal access gallery.
- Dual Aspect: The majority (85%) of 2 bed+ units are dual aspect. Overall 69% of the total number of units would be dual aspect.
- Materials: All buildings include a palette of red/brown brick and light precast concrete elements to ensure that the proposals will form a cohesive neighbourhood.
- Private Amenity: Private amenity is provided through private rear gardens for ground floor homes and balconies for those at upper floors. The rear gardens will face onto secure communal amenity spaces, with separation and privacy provided by hedges. Front gardens are proposed to provide a buffer between the public realm and ground floor units and will comprise either hedges or railings with a paved front garden.

Image - Proposed development



### Block 4A

43. Block 4A would be located on the corner of Thurlow Street and Albany Road and would extend northwards along Thurlow Street and then eastwards along Mina Road. Block 4A would comprise a 26-storey tower which would be positioned on the corner of Albany Road and would then step down to a mansion block which would be 10 storeys on Thurlow Street (eight storeys with a two-storey set back) and seven storeys on Mina Road. A total of 226 homes would be provided in Block 4A (168 in the tower and 58 within the mansion block). The basement of the tower would accommodate an energy centre that would serve the needs of the whole development. Amenity space would be provided in a large communal courtyard that would be shared with Block 4D with which Block 4A would form a perimeter block.

## Block 4B

44. Rising to five storeys and accommodating 24 flats and maisonettes, Block 4B would also follow a mansion block architectural style. This U-shaped block would be located on the junction of Bagshot Street and Albany Road with the main access being from Mina Road. The south facing communal courtyard would incorporate doorstep play.

## Block 4D

45. Block 4D would be a C shaped residential block rising to eight storeys and forming a perimeter block with Block 4A. Communal amenity space would be provided in the courtyard shared with 4A. A total of 89 homes (maisonettes at ground/first floor and flats above) would be provided in Block 4D and the basement would accommodate cycle parking, plant and wheelchair accessible parking.

## Block 5A

46. Located on Thurlow Street to the north of Block 4A and Mina Road, Block 5A would be formed of a perimeter block with a raised podium courtyard. The building would rise to nine storeys on Thurlow Street, seven storeys on Alvey Street and six storeys on Kinglake Street. A total of 262 new homes would be provided (maisonettes and flats) alongside undercroft parking. The ground floor of the building facing onto Thurlow Square (created by the development) would accommodate two commercial units.

## Block 5C

47. Block 5C is a six-storey u shaped block in the northeast corner of the site that would be bounded by the new Bagshot Park to the south and Kinglake House to the north. Block 5C would provide 39 new homes in the form of maisonettes and flats. A communal courtyard garden would be provided to the rear of the building in addition to a roof terrace.

## Schedule of accommodation

48. The development would provide the following accommodation:

Homes	Private Homes	Private HR.	Aff. SR Homes	Aff. SR HR	Aff. Int Homes	Aff. Int HR	Homes Total (% of total)	HR Total
<b>1-Bed</b>	156	316	32	66	32	65	<b>220 (34.3%)</b>	<b>447</b>
<b>2-Bed</b>	208	645	53	208	57	201	<b>318 (49.69%)</b>	<b>1054</b>
<b>3-Bed</b>	14	65	28	137	-	-	<b>42 (6.56%)</b>	<b>202</b>
<b>4-Bed</b>	-	-	49	288	-	-	<b>49 (7.66%)</b>	<b>288</b>

<b>5-Bed</b>	-	-	11	77	-	-	11 (1.72%)	77
<b>Total and % of total</b>	<b>378 59%</b>	<b>1026 49.61%</b>	<b>173 27.03%</b>	<b>776 37.52%</b>	<b>89 13.91%</b>	<b>266 12.86 %</b>	<b>640 100%</b>	<b>2068 100%</b>

49. The proposals would provide a total of 50.4% of affordable (by habitable room), with an affordable split of 75% social rent and 25% intermediate. This would equate to the provision of 173 social rented homes and 89 affordable intermediate homes. 10% of homes would also be provided as wheelchair accessible homes which equates to 64 wheelchair accessible dwellings.

### Non-residential floorspace

50. The proposed development includes 450sqm of flexible floorspace for commercial business and retail uses (Class E) and local community and learning uses (Class F1/F2(a)(b)). This would be provided within block 5A.

### Open Space provision:

51. The proposals include the provision of new open spaces throughout the site, with the two main spaces as Bagshot Park, which would be provided as a primary green space with new play spaces and MUGA with a total of 2,500sqm of open space, and Thurlow Square, a more civic space with generous planting, located along Thurlow Street which would provide 1,200sqm of open space. This would equate to a provision of approximately 3,700sqm of open space with the proposals. These spaces would be delivered alongside new public realm and street spaces, as well as courtyards and podiums for residents. Within these spaces, there would be a provision of 3,314.1sqm of total play space.

### Amendments to the application

52. As a result of Regulatory changes to the fire safety regime since the submission of the original application, amendments have been undertaken to the application following the previous resolution to grant permission by the Planning Committee in January 2023. The proposed amendments include the following:
- An increase in the overall number of homes from 614 to 640 (an increase of 26 homes);
  - Block 4A which includes the tower (4A1) and the mansion block (4A2), where the changes include an additional storey to the 4A2, a change in tenure of 4A2 to private sale and a new corridor linking the cores of 4A1 and 4A2 to enhance the escape routes for all units which has resulted in minor modifications to the tower;
  - Block 4D where an additional storey has been added bringing the height up to 8 storeys with a setback across the upper floor, and the entire 4D block has been changed to social rent tenure due to a linked core in part of the

building;

- Block 5A where a second stair core has been added to each of the cores allowing each apartment to have 2 escape stairs, and an additional storey has been added to each of the taller elements so that 5A1 and 5A2 are now both 10 storeys and 5A3 and 5A4 are 8 storeys; and
  - Block 5C where minor changes have been required to both cores to comply with updated fire guidance, which have then necessitated a number of changes to the unit mix and layouts.
53. The proposed development provides a total of 43 on-plot car parking spaces, 32 on-street parking spaces within the new public realm and 6 on-street, car club spaces. This is an uplift of 4 spaces over the previous scheme.
54. In terms of cycle parking, a total of 1,365 cycle parking spaces would be provided including 1,296 long stay spaces and 66 visitor spaces.

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

### Public Consultation

55. Neighbour consultation for the planning application was undertaken by the council through sending 971 letters to surrounding homes. Within the initial consultation in 2022, a total of 19 representations were received from neighbours and local groups (including Friends of Burgess Park and Southwark Law Centre) objecting to the proposed development. Three representations offering support for the development were received.
56. Following amendments to the scheme, further consultation was undertaken in November 2024 and in March/April 2025 following further clarifications. In total 64 representations have been received with 58 in objection to the proposals and six letters of support. At the time of writing, consultation was still in progress until 27 April 2025, any additional comments received will be reported within an addendum. These representations are summarised below:

### Support

- 57.
- Exactly what the area needs as it would provide over 600 new homes.
  - The proposal would replace outdated housing stock and provide new sustainable homes.
  - New retail facilities and commercial spaces are positive.

### Objections

58. Amenity impact
- Impact on Burgess Park, including from overlooking, light, loss of privacy, effect of the tall building on the park and the additional pressure on the

park from new residents.

- Loss of trees.
- Loss of open space.
- Reduction in planting

#### 59. Design issues

- Height scale and massing
- Impact on townscape
- Overdevelopment.
- Density
- Impact on heritage assets and Burgess Park.
- The buildings are taller than those envisaged by the AAAP.
- Lack of green fingers.
- The scheme does not reflect the heritage of the area.
- Poor design.
- Lack of connectivity and integration.
- Facilities should be made available to the whole community.

#### 60. Housing

- Insufficient affordable housing.
- Loss of housing including social housing.
- Loss of affordable floorspace
- Inflation of existing house prices.

#### 61. Sustainability and infrastructure

- Impact on transport
- Carbon emissions
- The buildings should be refurbished.
- Shortfall in Biodiversity Net gain.
- Insufficient sunlight for proposed green spaces
- Proposed green spaces are also more broken up between buildings, and much more heavily shaded than the old spaces.
- The new hard surface MUGA is taking up a large area coloured green and is misleading.
- Bagshot Street should be made a green finger.

#### 62. Other

- The proposals would not comply with the recent Judicial Review.

### **Planning history of the site and adjoining or nearby sites.**

63. Any decisions which are significant to the consideration of the current application are referred to within the relevant sections of the report. A fuller history of decisions relating to this site, and other nearby sites, is provided in Appendix 3.

## KEY ISSUES FOR CONSIDERATION

### Summary of main issues

64. The main issues to be considered in respect of this application are:
- Principle of the proposed development in terms of land use;
  - Environmental impact assessment
  - Housing mix, density and residential quality
  - Affordable housing and development viability
  - Amenity space and children's play space
  - Design, including layout and building heights
  - Inclusive design
  - Trees and Landscaping
  - Ecology and biodiversity
  - Heritage considerations
  - Archaeology
  - Impact of proposed development on amenity of adjoining occupiers and surrounding area, including privacy, daylight and sunlight
  - Transport and highways, including servicing, car parking and cycle parking
  - Environmental matters, including construction management, flooding and air quality
  - Energy and sustainability, including carbon emission reduction
  - Fire Safety
  - Planning obligations (S.106 undertaking or agreement)
  - Mayoral and borough community infrastructure levy (CIL)
  - Consultation responses and community engagement
  - Community impact, equalities assessment and human rights
65. These matters are discussed in detail in the 'Assessment' section of this report.

### Legal context

66. 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.
67. There are also specific statutory duties in respect of the Public Sector Equalities Duty which are highlighted in the relevant sections below and in the overall assessment at the end of the report.

## Planning policy

68. The statutory development plans for the Borough comprise the London Plan 2021 and the Southwark Plan 2022. The National Planning Policy Framework (2024) and emerging policies constitute material considerations but are not part of the statutory development plan. A list of policies which are relevant to this application is provided at Appendix 2. Any policies which are particularly relevant to the consideration of this application are highlighted in the report.
69. The OPP was determined on the basis of the Aylesbury Area Action Plan (AAAP). The AAAP has been superseded by the Southwark Plan 2022 however, where appropriate, the Southwark Plan policies make specific reference to the Aylesbury Action Area Core and as such largely reflect the policy requirements of the AAAP. Direct reference to the AAAP will be made throughout this report where necessary, in order to provide context to the previous decisions that were taken on several policy issues.
70. Policy Designations:
- The site is located within the:
- Air Quality Management Area;
  - Urban Density Zone;
  - Aylesbury Action Area Core
  - Flood risk zone 3
71. There are no statutorily listed buildings on the site, nor is the site located in a Conservation Area. The nearest listed buildings are:
- Former Fire Station Old Kent Road (Grade II) (500m to the east ( 200m to the north); and
  - 20-54 Surrey Square (Grade II including railings and raised pavement).
72. The nearest Conservation Areas are:
- Liverpool Grove (250 metres north west);
  - Coburg Road, Trafalgar Avenue and Glengall Road (320m south east);
  - Walworth Road (620 metres west); and
  - Addington Square (800 metres south).

### Site allocation NSP01

73. The Aylesbury Estate benefit from a site allocation in the Southwark Plan. The extract below from the NSP01 allocation illustrates the Aylesbury Action Area Core which forms the basis of the allocation site area.
74. The estate is undergoing significant regeneration to provide mixed use development, centred on building new homes with a range of tenures that will attract existing residents to stay and welcome new residents. Redevelopment will come forward in four phases as indicated in the site allocation. Through better urban design and architecture this will enable higher densities to be achieved and will bring more people to live in the action area

core, whilst at the same time improving the quality of residents' living conditions and the environment.

75. NSP01 sets a minimum residential capacity for the Aylesbury Action Area Core of 4,200 homes and states that redevelopment of the estate must:
- Increase the provision of new homes, including the re-provision of at least 2,249 social rented homes;
  - Provide employment space (minimum of 600m<sup>2</sup>), retail, community and leisure uses (up to 6,500m<sup>2</sup>), flexible retail or workspace (minimum of 600m<sup>2</sup>) to complement existing shops at the junction of Thurlow Street and East Street;
  - Provide new open space (30,000msqm).

## **ASSESSMENT**

### **Environmental impact assessment**

76. Environmental Impact Assessment is a statutory procedure that provides for a process assesses and reports upon the beneficial and adverse (positive and negative) environmental effects of development projects. The proposed development falls within Schedule 2, Category 10(b) 'Urban Development Project' of the EIA Regulations 2017 and constitutes EIA development having regard to its potential for likely significant environmental effects.
77. Regulation 3 of the EIA Regulations precludes the granting of planning permission unless the council has undertaken an Environmental Impact Assessment, taking account of the environmental information, which includes the ES, any further information, any representations made by consultation bodies, and any other person, about the environmental effects of the development.
78. In accordance with the EIA Regulations, an Environmental Statement (ES) comprising a Non-Technical Summary, Environmental Statement and Technical Appendices accompanies the application. Following revisions to the overall scheme, an EIA addendum was provided with additional information assessing the environmental impacts of the proposal and any changes that were proposed. That information has been taken into account. Officers are satisfied that the ES is up to date and that the effects described in the ES properly identify the likely significant effects of the proposed development on the environment.

#### **Alternatives:**

79. The EIA Regulations require the ES to provide information on the alternative options considered by the applicant and this includes a 'Do Nothing' scenario. It is stated by the applicant's consultants and accepted by officers that the 'Do Nothing' alternative would leave the application site in its current state. It should be noted that it has also been established in the Southwark Plan that the site represents an opportunity to redevelop the Aylesbury Estate to provide new and improved housing.

80. The 'Do Nothing' scenario is considered to have no environmental benefits compared with the proposed redevelopment of the site as the 'Do Nothing' scenario would leave a sustainable, brownfield site in inner London under used and would not bring forward the various benefits associated with development such as improved public realm, improved housing, new public space, improved legibility and connectivity.
81. No alternative sites or locations have been considered for the proposed development as the site benefits from a site allocation and policy support to deliver a strategic development in this location. Additionally, there is an extant consent on the site to redevelop it for housing.
82. The ES also describes the design evolution of the scheme which has been influenced by environmental factors, particularly townscape and heritage; LVMF Views; wind; daylight, sunlight and overshadowing; water resources, air quality and transport. As such, revised proposals, including the minor increase in scale and dwelling numbers, have been designed having full regard to the constraints and opportunities presented by the site as well as issues raised during the process.

### Cumulative impacts

83. The ES considers cumulative effects arising from the proposed development in combination with other surrounding consented and planned developments and where relevant these effects are discussed further in the topic specific chapters later in the report.
84. A detailed assessment of the likely potential and residual impacts of the scheme is provided in the relevant sections of this report, taking into account the ES and the material planning policy considerations. In summary, officers are satisfied that the ES is adequate to enable a fully informed assessment of the environmental effects of the proposal.

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

85. The NPPF makes it clear that delivering a significant number of new homes is a key priority for the planning system and promotes the use of suitable land within settlements and support for the development of underutilised sites especially where this would meet identified housing needs where supply is constrained. London Plan Policies GG4 and H1 reinforce the importance of delivering new homes, setting a 10-year target of 23,550 new dwellings for Southwark. The Southwark Plan policies reiterate the importance of delivering significant numbers of new dwellings. The Southwark Plan has identified capacity to meet the London Plan target of 23,550 by 2028.
86. Together with the rest of the Aylesbury Estate, the application site is subject to Southwark Plan site allocation NSP01 – Aylesbury Action Area Core. The site allocation, which covers the entire Aylesbury Estate, seeks the delivery of a minimum of 4,200 new homes across the Action Area Core. As such, it is clear that development plan policy still supports the provision of new homes on this

site. The principle of a large-scale, high-density housing development has been accepted through the OPP and this remains a material consideration.

### Provision of non-residential floorspace

87. The site currently accommodates 480sqm (GIA) of non-residential floorspace that comprises office space, a learning centre and a music room. The proposed development would provide 450sqm of flexible commercial business and service uses (Class E) and local community and learning uses (Class F1/F2(a)(b)).
88. It is noted that this would be a 30sqm reduction on the current provision however it is important to note that the site allocation does not protect commercial, leisure or learning floorspace in situ. Instead, the site allocation sets out the estate wide requirements and that redevelopment of the estate is expected to provide new retail, community and leisure uses. The site allocation takes in the whole Aylesbury Action Area Core and requires a minimum of 600sqm of employment space; up to 6,500sqm of retail, community and leisure uses; and a minimum of 600sqm of flexible retail or workspace
89. It should be noted that Phase 2A (Plot 18) has recently been completed and accommodated 225sqm of retail space; 889sqm of Class F space (formerly Class D) which included a library, a stay and play facility, public meeting rooms, Creation Trust offices and an afterhours facility. Plot 18 also provided a 3,880sqm health centre and a 947sqm Early Years facility.
90. Phase 2C, Phase 3 and Phase 4 of the OPP which lie within the site allocation are still to come forward for redevelopment and are much larger in terms of area than the earlier phases. Officers consider that the flexible floorspace proposed as part of the current Phase 2B application, in addition to the re-provision secured to date on earlier phases of the OPP (such as Plot 18 outlined above) is such that the NSP allocation requirements will be fully delivered as part of the estate wide redevelopment.

### Delivery of housing

91. As noted, the Southwark Plan site allocation NSP01 sets a minimum residential capacity for the Aylesbury Action Area Core of 4,200 homes and states that redevelopment of the estate must increase the provision of new homes, including the re-provision of at least 2,249 social rented homes.
92. London Plan policy H8 - Loss of existing housing and estate redevelopment, outlines that demolition of affordable housing, including where it is part of an estate redevelopment programme, should not be permitted unless it is replaced by an equivalent amount of affordable housing floorspace.
93. This proposal would meet the key visions of the site designation, providing 640 new homes, including 173 social rented homes and 89 affordable intermediate homes. This would result in an overall increase of homes from 373 to 640, resulting in an additional 267 additional dwellings. In relation to affordable homes provision, in total 262 affordable units would be provided which would

be a loss of number of homes from 316.

94. In relation to delivery of overall floorspace, there would be an increase in overall GIA floorspace from 23,650.2sqm to 62,567sqm, demonstrating that the proposal would result in a significant uplift in residential accommodation. The existing affordable social rented floorspace on the Phase 2B site comprises 20,151sqm (GIA). The proposed development would provide a total of 20,637sqm GIA of social rented floorspace; in addition to this there would be 8,488sqm GIA of intermediate affordable housing. This would result in an increase of 486sqm social rented floorspace when compared to the existing housing on site and an overall uplift in total affordable housing floorspace of 9,140sqm.

### **Affordable housing and development viability**

95. Section 5 of the NPPF sets out the government's approach to the delivery of significant new housing including a requirement for housing of different sizes, types and tenures to meet the needs of different groups. London plan policy H1 sets out the requirements for boroughs to achieve the increased housing supply targets which identifies a ten-year housing completion target of 23,550 for Southwark Council. The supporting text to policy H4 of the London Plan 'Delivering affordable housing' sets out that there is a need for the provision of 43,500 affordable homes per year across London.
96. Policy H6 (affordable housing tenure) states that the split of affordable products should include a minimum of 30% low-cost rented homes and a minimum of 30% intermediate products. The remaining 40% should be specified by the borough as per identified need.
97. Policy H8 (Loss of existing housing and estate redevelopment) states that the loss of existing housing should be replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace. Part E of the Policy states that all development proposals that include the demolition and replacement of affordable housing are required to follow the Viability Tested Route and should seek to provide an uplift in affordable housing in addition to the replacement affordable housing floorspace.
98. At borough level, strategic policy SP1 'Homes for all' of the Southwark Plan requires 2,355 new homes to be delivered per annum. Policy P1 'Social rented and intermediate housing' of the Southwark Plan requires developments of 10 or more residential units to provide a minimum of 35% affordable housing, comprising a minimum of 25% as social rented and the remainder as intermediate. On Phase 2B of the Aylesbury, the minimum affordable housing requirement is 50% affordable housing overall with a tenure split of 75% social rented and 25% intermediate.
99. This policy sets out that for affordable housing purposes a habitable room of up to 28sqm is counted as one habitable room, a room between 28.1-42sqm is counted as two habitable rooms and so on.
100. As well as considering the issues relating to minimum quantum of affordable

housing (the 50% requirement and the 75:25 tenure split) it is also a requirement to consider the re-provision of the existing affordable housing floorspace within the phase 2B application site. As such it is important to review what has been delivered or approved to date in order to assess how this standalone Phase 2B application would contribute to the wider regeneration of the Aylesbury Estate.

101. The existing accommodation on the phase 2 application site, provides 373 residential homes, (a total of 23,650.2sqm GIA floorspace). Of these, 316 homes are social rented tenure which from the council's most recent records contain 793 habitable rooms within the existing site, which are currently social rented tenure (a total of 20,151sqm GIA). The remaining homes are in leaseholder ownership.

### Proposed Affordable Housing

102. In relation to the proposed provision of accommodation within the phase 2B application site, the below table sets out the overall quantum of housing, including affordable housing proposed within the development:

Homes	Private Homes	Private HR.	Aff. SR Homes	Aff. SR HR	Aff. Int Homes	Aff. Int HR	Homes Total (% of total)	HR Total
<b>1-Bed</b>	156	316	32	66	32	65	<b>220 (34.3%)</b>	<b>447</b>
<b>2-Bed</b>	208	645	53	208	57	201	<b>318 (49.69%)</b>	<b>1054</b>
<b>3-Bed</b>	14	65	28	137	-	-	<b>42 (6.56%)</b>	<b>202</b>
<b>4-Bed</b>	-	-	49	288	-	-	<b>49 (7.66%)</b>	<b>288</b>
<b>5-Bed</b>	-	-	11	77	-	-	<b>11 (1.72%)</b>	<b>77</b>
<b>Total and % of total</b>	<b>378 59%</b>	<b>1026 49.61%</b>	<b>173 27.03%</b>	<b>776 37.52%</b>	<b>89 13.91%</b>	<b>266 12.86%</b>	<b>640 100%</b>	<b>2068 100%</b>

103. The proposal provides a total of 262 affordable homes (comprising 1042 habitable rooms), of which 173 are social rented units (776 habitable rooms) and 89 are intermediate homes to be provided as shared ownership (with 266 habitable rooms).
104. In terms of Southwark Plan policy SP1, the proposed affordable housing offer would be policy compliant in the provision of 50% affordable housing. It is noted that the tenure split is slightly below the 75:25 split required by policy. Based on habitable rooms, the proposal would provide a 74.5/25.5 split which, given the small degree of variation is considered acceptable.

### Like for like replacement

105. London Plan Policy H8, and the Mayor's Affordable Housing and Viability SPG

also provide guidance on estate regeneration and makes it clear that the Mayor expects existing affordable housing to be replaced on a like-for-like basis and that demolition of affordable housing, including where it is part of an estate redevelopment programme, should not be permitted unless it is replaced by an equivalent amount of affordable housing floorspace. The policy goes on to note that “For the purposes of this policy, existing affordable housing floorspace includes both occupied and vacant floorspace regardless of the current condition of stock”. As such, all of the buildings currently within the site are included for the purposes of the below calculations. Objections, including from the Southwark Law Centre suggest that floorspace for the demolished Foxcote block should be included in this calculation. Foxcote was demolished before the submission of this application and is not existing floorspace.

106. The application outlines that the existing site comprises 316 affordable (social rent) units which equates to 793 habitable rooms when based on the council’s records. The proposed development would deliver 173 social rented units, and the total number of social rented habitable rooms would be 776.
107. When compared to the existing affordable housing on site, there would be 154 fewer social rent homes within the proposed development, and 17 fewer social rent habitable rooms. The Southwark Plan does not include a requirement to replace all existing social rent homes or habitable rooms but rather says that for Phase 2, the housing requirement is for there to be 50% market and 50% affordable, with the affordable provided with a tenure mix of 75%:25% for social rent/intermediate.
108. The London Plan Policy H8, as mentioned above, does contain a requirement for the replacement of social housing based on floorspace rather than the number of homes or habitable rooms. The existing affordable social rented floorspace on the Phase 2B site comprises 20,151sqm (GIA). The proposed development would provide a total of 20,637sqm GIA of social rented floorspace; in addition to this there would be 8,488sqm GIA of intermediate affordable housing.
109. This would be an overall increase in 486sqm social rented floorspace when compared to the existing housing on site and an overall uplift in total affordable housing floorspace of 9,140sqm, which would meet the requirements of London Plan Policy H8. Furthermore, when you consider the overall estate regeneration as a whole there is a gain in overall social rented floorspace across the entire masterplan which meets London Plan policy requirements.
110. As stated, given that estate regeneration relates to the comprehensive estate, it is prudent to review the existing and permitted/proposed floorspace to date. This is set out in the table below.

<u>Existing Plot</u>	<u>Existing baseline social rent floorspace (sqm)</u>	<u>Permitted/proposed social rent floorspace (sqm).</u>
Phase 1A	2,485	11,654.83
Site 7	3,554	

Plot 18	2,587	1,446.3
FDS	31,822	28,233.49
Total	40,448	41,334.64
Phase 2B	20,151	20,637.12
Overall total	60,599	61,971.76

111. This demonstrates that to date, the permitted schemes provide an uplift of 886.64sqm when compared to the estate baseline. With the addition of the proposed Phase 2B development, there would continue to be a significant uplift in social rented floorspace of 1,372.76sqm.
112. The applicant has submitted a viability assessment that demonstrates that the proposed affordable housing offer at 50% would constitute the maximum reasonable amount. This has been fully reviewed by the council's viability advisor who have confirmed that the proposals provide for the maximum viable amount of affordable housing floorspace.
113. To conclude on affordable housing, the phase 2B application site would provide an overall provision of 50% affordable housing which would meet the requirements of the Southwark Plan. It would provide a 74.5/25.5 split of social rent/intermediate, which, given the small degree of variation is considered acceptable. It would also provide an uplift of affordable housing floorspace of in 486sqm social rented floorspace when compared to the existing housing on the phase 2B site and an overall uplift in total affordable housing floorspace of 9,140sqm.

### Land use conclusion

114. Overall, the proposed development is acceptable in land use terms. It would provide a significant uplift in homes, including affordable homes which would meet the requirements of the site allocation (NSP01) of the Southwark Plan as well as complying with the housing policies of the Southwark plan and the London Plan. The provision of flexible commercial and leisure/community space is also supported and would contribute to meeting the site wide requirements of the site allocation. The contribution towards housing in the borough is a significant positive aspect of the proposal.

### **Housing mix and residential quality**

115. London Plan Policy H12 advises that schemes should generally consist of a range of unit sizes, having regard to a number of factors including housing need and demand, the requirement to deliver mixed and inclusive neighbourhoods, the mix of uses in the scheme, the range of tenures in the scheme, the nature and location of the site and the aim to optimise housing potential.
116. Within the Aylesbury Area Action Core, Policy P2 of the Southwark Plan 'New family homes' sets out the required and proposed housing mix, and requires a maximum of 3% studio homes, minimum of 70% 2+ bedroom homes, a minimum of 20% 3 bed homes, 7% 4 bed homes and 3% 5 bed homes.

117. The proposed development would provide the following housing mix:

Unit Type	Requirement	Proposed (total)	Affordable
Studio	3% max	0%	0%
Two bed +	70% minimum	65.63%	75.57%
Three bed +	20% minimum	15.84%	33.59%
Four bed	7% minimum	7.66% (9.38% 4 bed+)	18.70% (22.9% 4 bed +)
Five bed	3% minimum	1.72%	4.20%

118. Officers note that there would be a 4.37% shortfall on the two-bedroom plus homes as well as a shortfall on three- and five-bedroom units whilst the target for four-bedroom units would be exceeded.

119. When looking at the housing mix, it is clear that the larger sized units have been prioritised for affordable housing. In particular all of the four and the five-bedroom units would be social rent. The unit mix breakdown, particularly with regards to the affordable units, has been developed in conjunction with the council's Housing team to meet local need. The provision of a higher proportion of one and two bed homes in the private sale portion of the scheme helps with the scheme's viability.

120. For these reasons the proposed dwelling mix is considered acceptable, providing majority of homes as 2+bed spaces, with the larger dwellings also being focused within the social rented tenure where this need is most acute.

### Wheelchair accessible housing

121. Policy D7 of the London Plan 'Accessible housing' requires residential development to provide at least 10% of dwellings to meet Building Regulation requirement M4(3) 'wheelchair user dwellings' and for the remaining dwellings to meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. Policy P7 of the Southwark Plan requires the 10% to be based on habitable rooms rather than unit numbers. It also states that where those homes are affordable wheelchair user homes, 10% of the social rented homes must meet Building Regulations M4(3)(2)(b) standard (wheelchair accessible dwellings). It sets out larger minimum floor areas which wheelchair accessible dwellings must meet and requires a mix of dwelling sizes and tenures that meet the above standards, including family homes. Two-bedroom three-person affordable wheelchair homes will not be acceptable.

122. The proposed development would provide 64 wheelchair accessible homes spread across all tenures and this would equate to 10% wheelchair homes thereby satisfying the policy requirement. These 64 homes would meet Part M4(3)(a) standards with social rented units meeting Part M4 (3)(b) and all remaining dwellings achieving Part M4(2). Additionally, the wheelchair units would all meet or exceed the accessible wheelchair user housing minimum space standards set out in Policy P7 and the Residential Design Standards SPD.

## Quality of accommodation

123. Policy D6 of the London Plan ‘Housing quality and standards’ requires housing developments to be of high-quality design and to provide adequately sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures.
124. Policy P15 of the Southwark Plan requires developments to achieve an exemplary standard of residential design and sets out a number of criteria which must be met. The council's Residential Design Standards SPD establishes minimum room and overall flat sizes dependant on occupancy levels, and units should be dual aspect to allow for good levels of light, outlook and cross ventilation.
125. Policy P15 also sets out the specific space standards that apply to new affordable homes within the Aylesbury Action Area Core, generally replicating the space standards that were set out in the now superseded AAP with the exception of five-bedroom (seven person) and four-bedroom (six person) flats whereby the new space standards in the Southwark Plan are slightly larger.
126. All dwellings would meet or exceed the standards set out in Southwark Plan policy P15 which is considered acceptable.

## Internal daylight

127. A daylight and sunlight assessment for the proposed dwellings has been submitted, based on the Building Research Establishment (BRE) Guidance (2022). This guidance provides advice, but also clearly states that it “is not mandatory and the guide should not be seen as an instrument of planning policy.” The guidance also acknowledges in its introduction that “Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout. In special circumstances the developer or planning authority may wish to use different target values. For example, in an area with modern high-rise buildings, a higher degree of obstruction may be unavoidable if new developments are to match the height and proportions of existing buildings”. The BRE guidance uses two methods for assessing the daylight quality within new developments: the illuminance method or the daylight factor method. The details of these two methods are set out below.
128. The illuminance method - Climate Based Daylight Modelling (CBDM) is used to predict daylight illuminance using sun and sky conditions derived from standard meteorological data (often referred to as climate or weather data). This analytical method allows the prediction of absolute daylight illuminance based on the location and building orientation, in addition to the building’s daylight systems (shading systems, for example). The guidance proposes target illuminances to exceed 50% of daylight hours across half the room. This is considered to be the most accurate approach when using climate data, however, it provides a very large amount of data for each assessed room which then needs to be interrogated. One of the methodologies that can be used to interrogate this data is Spatial Daylight Autonomy (sDA).

129. The sDA assessment is designed to understand how often each point of the room's task area sees illuminance levels at or above a specific threshold. The guidance sets out a minimum illuminance level that should be exceeded over half the space for more than 50% of the daylight hours in the year. Within high density residential settings, the following targets apply:
- 100 lux for bedrooms
  - 150 lux for living rooms
  - 200 lux for living/kitchen/diners, kitchens, and studios.
130. As noted above, the BRE guidelines suggest that local authorities could use discretion with living/kitchen/dining rooms and use the living room target of 150 Lux. The applicants have provided an assessment using both the 150Lux and 200 Lux benchmarks.
131. The daylight factor method - This is the illuminance at a point on the reference plane in a space, divided by the illuminance on an unobstructed horizontal surface outdoors. The CIE standard overcast sky is used, and the ratio is usually expressed as a percentage. This method of assessments considers an overcast sky, and therefore the orientation and geographic location of buildings is not relevant. In order to account for different climatic conditions, the guidance sets equivalent daylight factor targets (D) for various locations in Europe. The median daylight factor (MDF) should meet or exceed the target daylight factor relative to a given illuminance for more than half of daylight hours, over 50% of the reference plane.
132. A daylight and sunlight assessment based on the 2022 BRE guidance has been submitted, which uses the illuminance method for testing daylight to the proposed flats. It concludes that 77% of the habitable rooms would meet or exceed the BRE targets when using the 150 Lux benchmark when based on the existing surrounding scenario, which would be a high level of compliance.
133. Consideration has also been given to the daylight that would be experienced by the proposed units once adjacent OPP sites have been redeveloped. This included an assessment of daylight if the adjacent plots were developed to the indicative massing in the OPP and a further assessment based on the adjacent plots being developed to the maximum parameters permitted by the OPP. The compliance rate would be 75% and 70% respectively when using the 150Lux benchmark in these scenarios which would represent a good standard of internal daylight amenity and would ensure the homes would be well lit.
134. When using the 200Lux for all Living room/kitchen/dining rooms as a benchmark, the proposals would still have good levels of compliance with the BRE guidance, with 71% of rooms exceeding the requirements in the current scenario, 69% when using the OPP illustrative massing and 65% would comply with the BRE guidance when using the maximum parameter heights within the OPP for the surrounding phases. This would still demonstrate a good level of compliance with the BRE guidance, and overall, this is considered to be a good access to daylight within the proposed development as a whole.

135. With regard to sunlight to new dwellings, the BRE guidance recommends that:

- At least one main wall faces within 90 degrees of due south; and
- a habitable room, preferably a main living room, receives a total of at least 1.5 hours of sunlight on 21st March.

136. The submitted sunlight assessment based on the 2022 BRE guidance concludes that 88% of the homes tested within the development would have a room that would meet or exceed the BRE targets, by providing at least 1.5 hours of sunlight on 21st March, which would be a high level of compliance with regards to the levels of sunlight received within each home.

### Conclusion on internal daylight and sunlight received

137. Overall, the vast majority of rooms within the development would achieve BRE compliant levels of daylight and sunlight within the proposed buildings and would thus provide a high quality of residential accommodation for the future occupiers of the site.

### Overshadowing of amenity spaces within the development

138. The BRE criteria for gardens or amenity areas are as follows, 'It is recommended that for it to appear adequately sunlit throughout the year, at least half of a garden or amenity space should receive at least two hours of sunlight on 21 March.

139. The assessment of sunlight (overshadowing) within the proposed outdoor amenity areas of the proposed development shows that 5 of the 9 proposed amenity spaces would comply with the requirements of 50% of the amenity space receiving 2 hours or more of direct sunlight, and as such would meet the requirements of the BRE guidance. The below diagram sets out in yellow the spaces which comply with the 2-hour requirement on 21 March:



140. The above diagram demonstrates that the key public spaces of Bagshot Park and Thurlow Square would have very high levels of compliance with 99.5% and 99.9% of the spaces achieving the at least 2 hours of sunlight, with the courtyard of plot 4B also achieving in excess of 50% of the space achieving more than 2 hours of sunlight on 21 March.
141. In relation to the remaining spaces of the courtyards for the blocks 4A/4D, 5A and 5C, the applicants have provided further tests, to look at when these amenity spaces would meet the 50% requirement. The combined area of communal amenity that achieves 2 hours of sunlight on 21 March for Blocks 4A/D is 195 sqm. However, this increases to 386 sqm on 1 April, less than two weeks later, which is 52% of the required amenity space provision.
142. In relation to plot 5A, the podium level communal amenity area within the courtyard achieves 2 hours of sunlight to 51% of its area on 3 April, compliant with the guidelines which again is less than 2 weeks later. In relation to block 5C, the 50% target is met on the 18 April, around four weeks later than the BRE suggested date of 21 March.
143. These results are largely comparable to the scheme previously presented to members in January 2023 and this is considered acceptable and would ensure good lighting to amenity spaces especially in the spring and summer months when the spaces are more likely to be used.

## Overlooking and privacy between proposed blocks

144. In order to prevent harmful overlooking, the Residential Design Standards SPD 2011 requires developments to achieve a distance of 12m at the front of the building and any elevation that fronts a highway and a minimum of 21m at the rear.
145. In relation to the distances between the proposed blocks within this development, these standards would be met in all cases with the exception of the open courtyard in Block 4B whereby the closet point between opposing facades would be 17 metres and then extending to 24 metres. This is an isolated instance affecting only four homes at first floor level in which bedrooms face one another and two homes at second floor level where kitchens face one another. The separation distance is still considered to offer a good standard of amenity for future occupiers.
146. Given that the vast majority of the habitable windows facing one another would meet the requirements of the Residential Design Standards, officers consider that outlook and privacy for the proposed dwellings and any impacts on neighbouring properties would be acceptable.

### Aspect

147. Policy P15 of the Southwark Plan 'Residential design' requires residential units to be predominantly dual aspect and allow for natural cross ventilation. In circumstances where due to site constraints it is impossible or impractical to provide dual aspect dwellings, it must be demonstrated how overheating, and ventilation will be mitigated (this is considered later in the report). Single aspect dwellings will not be acceptable if they have three or more bedrooms, or are north-facing, or where the façade is exposed to high noise levels.
148. The application proposes a high proportion of the homes (69.22%) to be dual aspect in accordance with the definition set out in the Southwark Plan. Furthermore, there would be no north facing single aspect homes, with all the single aspect homes facing east, south or west. All 3+ bed units are dual aspect, and 85% of two-bed units are dual aspect. The below table sets out level of dual aspect dwellings by tenure showing that the vast majority of the social rented properties would be dual aspect.

149.

Tenure	Single Aspect		Dual Aspect	
	Units	%	Units	%
Shared Ownership	47	53%	42	47%
Social rent	29	17%	144	83%
Private	121	32%	257	68%
Total	197	31%	443	69%

150. Officers consider the proposed level of dual aspect at 69% of the homes to be acceptable with, ensuring that 85% of the two beds plus units being dual aspect and all 3-bed plus homes having access to dual aspects. Whilst it is noted that there are some homes that are not dual aspect, the standard of living

accommodation would be high.

## Overheating

151. Policy SI.4 of the London Plan provides further guidance and suggests that overheating should be addressed by following the cooling hierarchy which includes minimising internal heat generation; reducing the amount of heat entering a building in summer through orientation, shading, albedo, fenestration, insulation, green roofs and walls; managing the heat within the building through exposed internal thermal mass and high ceilings; passive ventilation; and active cooling systems (assuming that they are the lowest carbon option).
152. Southwark Plan Policy P15 'Residential Design' outlines that in circumstances where, due to site constraints, it is impossible or impractical to provide dual aspect dwellings it must be demonstrated how overheating, and ventilation will be mitigated.
153. The applicants have provided an overheating assessment which outlines that the design of the scheme has sought to incorporate measures from the cooling hierarchy. Mitigation measures have been included such as 2.5m high ceilings, appropriate glazing ratios, use of architectural detail elements such as recessed and overhanging balconies for solar shading, mechanical and natural ventilation measures will ensure that these measures would minimise internal heat gains. The submitted details are considered acceptable, with the GLA confirming the acceptability of the overheating strategy for the development.

## Amenity space

154. Policy D6 of the London Plan requires private outdoor amenity space to have a minimum depth and width of 1.5m, and this requirement would be met. Section 3 of the Residential Design Standards SPD sets out the council's amenity space requirements for residential developments. Flats should have a minimum of 10sqm of private amenity space, and any shortfall must be added to the communal provision.
155. Policy P2 of the Southwark Plan requires family homes in apartment blocks to have direct access to outdoor amenity space and allow for oversight of children outside. Policy P15 of the Southwark Plan sets out the amenity space standards for new development in the borough and reiterates the requirement of a minimum of 50sqm communal amenity space per block.
156. In the proposed development, every, one and two-bedroom flat would benefit from a balcony or terrace of at least 6sqm. All homes with three or more bedrooms would benefit from at least 10sqm private amenity space. Each block would have at least 50sqm of communal amenity space and this is policy compliant.
157. Policy requires any shortfall in private amenity space (on those spaces not achieving at least 10sqm) be added to the communal amenity space

requirement. This is provided in full, thereby meeting the policy, and is set out in the table below:

Block	Private amenity space shortfall (sqm)	Communal amenity space requirement (sqm)	Total Amenity Space provision (sqm)	Balance
4A	577.7	627.7	845	+217.3
4B	13.2	63.2	250	+186.8
4D	148	198	845	+647
5A	651.7	701.7	1,835	+1,133.3
5C	24.8	74.8	500	+425.2
<b>Total</b>	<b>1,409.4</b>	<b>1,659.4</b>	<b>4,275</b>	<b>+1,615.6</b>

158. The overall communal amenity space being proposed would be significantly more than the policy requirement, even when taking into account the private amenity space shortfall. This is a significant benefit of the scheme and would result in amenity spaces that can be enjoyed by all residents in generous and well-designed courtyards.

### Children's play space

159. Policy S4 of the London Plan states that development proposals should incorporate high quality, accessible play provision for all ages, of at least 10 sqm Per child. Play space provision should normally be provided on-site. However, off-site provision may be acceptable where it can be demonstrated that this would address the needs of the development and can be provided nearby within an accessible and safe walking distance. In these circumstances contributions to off-site provision should be secured by a section 106 agreement. Play space provision should be available to all housing tenures to promote social inclusion. The requirement should be based on the GLA Population Yield Calculator.
160. The proposed mix requires a total of 3,314 m<sup>2</sup> of play space as per the GLA Play Calculator across. The proposed scheme meets the policy requirement, providing a total of 3,619m<sup>2</sup>. The play space proposed is broken down into the following age groups:

161.

<u>Age Group</u>	<u>Play space requirement (sqm)</u>	<u>Play space provided (sqm)</u>
<u>Under 5</u>	<u>1,227</u>	<u>1,354</u>
<u>5-11</u>	<u>1,069</u>	<u>1,150</u>
<u>12+</u>	<u>1,018</u>	<u>1,115</u>

The image below sets out the location of the playspace and the age groups for each of the areas



162. The applicant is proposing to provide all child play space on site for all age groups, albeit with an over provision for under 5s and small shortfalls for 5-11 and 12+ play space. This would include play spaces within all of the communal courtyards that would focus on doorstep play and play spaces for the older groups within the public realm such as the proposed Bagshot Park (see image below) and Thurlow Square. This is fully supported and meets policy requirements.



163. The overall play space provision on site would be above the minimum play space requirements which is supported. Whilst there would be a small under provision for the older age groups, the high quality of space and over-provision for under 5's would mitigate this minor shortfall which is considered acceptable. Overall, the quantum is considered acceptable and the play space provided would be of a very high quality.

### **Design quality**

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

## Site context

166. Site allocation NSP01 assumes redevelopment at a higher density than the existing estate and covers the estate as a whole. The application relates to a discrete proposal within the consented Aylesbury Masterplan - a hybrid application with Outline permission for the Masterplan and the First Development Site (FDS) in detail. The proposal is for a stand-alone application adopting the main urban design principles embedded in the outline permission but delivering them in a new form taking into account changes to national, regional and local planning policy adopted after the outline permission was consented.

## Urban Design (Height, Scale, Massing and Arrangement)

167. The urban layout for this stand-alone phase of the Aylesbury plan is rooted in the main principles of the consented Masterplan in the Outline permission. These urban design principles include: the emphasis on streets and routes through the creation of perimeter blocks; the delivery of a park and green 'fingers' on the main north-south routes; and the placement of tall buildings at key junctions facing onto Burgess Park. In this way the discrete area defined by this phase of development has been divided into four development 'plots' arranged around two new routes.

Image - Proposed Layout



#### OUTLINE PLANNING PERMISSION

- Taller mansion blocks facing Thurlow St and 5-6 storey buildings facing Bagshot Street.
- The 'district landmark' is developed on the SW corner of plot 4A.



#### PHASE 2B PROPOSAL

- Taller mansion blocks facing Thurlow St and 5-6 storey buildings facing Bagshot Street.
- The 'district landmark' is developed on the SW corner of plot 4A.

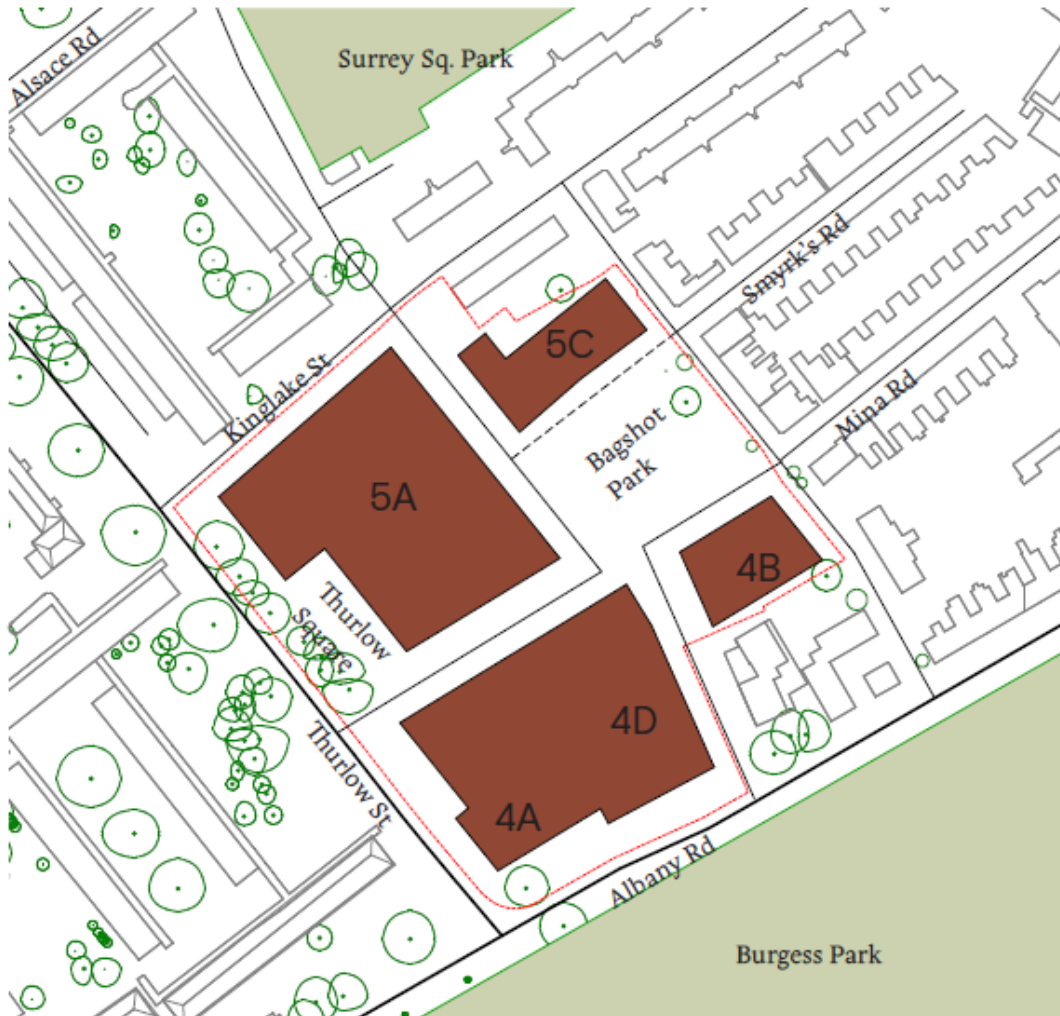


168. The public realm is the defining feature of the development. Structured around two new tree-lined routes a new public space and a new public park the public realm is generous and helps to stitch this part of the city back into the surrounding streets and neighbourhoods. It is a framework that distinguishes the public from the private spaces and places and ensures that the development is legible and accessible to those who live and visit this part of Southwark. Blocks have been designed with landscaped courtyards at the centre and the public spaces optimise the retention of existing high quality

mature trees.

Image – Plot extents and routes

169.



170. The first route that defines this urban layout is an east-west route connecting Thurlow Street to Bagshot Street leading to Mina Road. This not only extends established roads and routes across and through the estate and offers direct access between Thurlow Street and the Old Kent Road beyond. The second route is a north-south connection that extends Haywood Street to Kinglake Street and the 'Green Link' at Alvey Street. These two routes not only give the layout, feel and scale of a normal city blocks but also couples urban connectivity and accessibility with the natural surveillance offered by the new perimeter block design.

171. The four plots are further defined by two generous areas of landscape, a pocket park and public space on Thurlow Street, and a new urban park at the eastern edge of the site on Bagshot Street. These two landscaped spaces not only capitalise on established mature trees ensuring their retention as part of the new development, but also help to define this place around substantial green infrastructure with all the benefits that flow from it. These new green places establish new foci around which the new homes will cluster and, located as they are on public routes will also offer safe and accessible public spaces for the whole neighbourhood, not just the residents of the new estate.

## Ground floor plans and layout

### GROUND FLOOR PLAN



172. The arrangement of the urban design is sensible and, in the cases of sub-plots 4A/D and 5A defined entirely by new designed perimeter blocks. The perimeter block in sub-plot 4A/D is defined by two C-shaped block that combine to define a central landscaped courtyard with open ends leading to Albany Road and Bagshot Park to offer future residents good access to nearby places and the security of a resident's garden for their own use. The arrangement was defined

by high quality mature trees planned for retention. On sub-plot 5A the perimeter block is designed as an articulated square, set-back on Thurlow Street to create the landscaped public square and with an open route to the centre and landscaped resident's garden.

173. In the cases of 4B and 5C the new 'U' and 'C'-shaped blocks respectively combine with existing buildings to complete new perimeter blocks. The U-shaped building proposed for sub-plot 4B combines with Domville Court and the APF to define a perimeter block facing Bagshot Park and with a south-facing communal garden at its centre. On sub-plot 5C the proposed C-shaped block transforms the Faversham House car park and adjacent land into a new communal garden, children's play space and parking court with primary frontages onto Haywood and Bagshot Street and a façade that faces onto Bagshot Park.
174. The urban form and layout have been reviewed in detail over by Officers and the DRP with a return visit to the DRP to finalise. The urban design of the scheme optimises public spaces and has the feel of a neighbourhood, knitting back to established routes and links defined by the two generous landscaped gardens at its core. The height of the proposed blocks flow from the outline permission. Perimeter blocks range from 6-7-storeys in height at the core of Phase 2B rising to 9-storeys high on the Thurlow Street frontage. At the corner of Thurlow Street and Albany Road where the Masterplan envisaged a greater height, a single corner tower is proposed set at 26-storeys. At the eastern edge of the site, where the new plan abuts the existing townscape of Bagshot Street, the blocks step down 5 and 4-storeys to reflect the established heights of the existing Domville Court and Faversham House that will bookend the proposals. Whilst this height varies from the SP allocation NSP01 which noted that "The tall building should comprise the district landmark building of between 15 and 20 storeys at the junction of Thurlow Street and Albany Road." and the OPP, however the 26-story tower is in the location of site identified as a district landmark. It would continue to fulfil that function, "symbolising the areas regeneration". The detailed design has been assessed against policy P17 Tall Buildings in paragraphs below and meets those policy requirements.

## Proposed Axonometric



175. In terms of massing the new perimeter blocks are defined by modern deck-access apartments that not only allow for a high level of dual aspect homes but also ensure that the blocks are relatively narrow to optimise the communal garden space at the centre of each sub-plot. In this way landscaped courts for residents have been designed into the centre of each sub-plot offering communal gardens for residents in addition to the public park and square nearby. The configuration of blocks into mansion-style building with generous deck-access spaces ensure that the development has a human scale and massing that will encourage neighbourliness and communal interaction.
176. In urban design terms the proposal meets and exceeds the expectations of policy in terms of establishing a natural arrangement of blocks and spaces that respond to established routes and links as well as the urban hierarchy of the place. In this way the proposals amplify the principles of the consented outline and establish a sense of place that is fitting for this new neighbourhood built

around generous sunlit landscaped spaces and places. The emphasis on the east-west routes in addition to the north-south connections ensures that the new Aylesbury will offer connections to the emerging Old Kent Road area in the same way that the original proposals prioritised the north-south links to the Elephant and Castle Area.

## Conclusion on Urban design

177. The proposal is an intricate and well-conceived piece of urban fabric that has been arranged to stitch in with existing streets, places and spaces naturally. Whilst the tallest building is higher than the scale indicated in the Southwark Plan site allocation and the OPP, the urban form has been carefully assessed and is considered to be legible and human in scale with highly articulated blocks that are of a scale and height appropriate to their urban setting. The emphasis on open spaces, places and routes that are accessible to all will ensure the landscape and retained mature trees will be the centre-piece of this new neighbourhood. Officers are satisfied that the form of the development reflects the urban character and scale of the existing context and in this way complies fully with the council's policies on urban design and place.

## Architectural design and materials

178. The approach to architectural design has been developed by the Masterplanners who have worked in collaboration with 4 other architects and a specialist Landscape Architect across the application site. Each firm of architects has taken on a plot responding in a unique way to their immediate context but with a commonality of materials - mainly brick with pre-cast concrete elements - and the urban typology of the modern 'mansion block', in order to ensure that the development overall will appear like a family of buildings.
179. The tallest building in the development is located at the corner of Thurlow Street and Albany Road on sub-plot 4A. The design is based around a cruciform plan which optimises dual aspect for the apartments and makes the most of views across the park. The tower is designed with a clearly defined base with articulate brickwork and large areas of glazing and active uses. The main body of the tower is defined by its horizontal windows and scalloped brick design which gives the design a strong vertical emphasis and a tactile appearance making the most of the brick cladding. At the top the cruciform design is simplified and the vertical emphasis extended across the top three floors to give the building an elegant 'crown'

CGI showing view looking Southeast towards block Thurlow Square and Block 4A and Block 5C

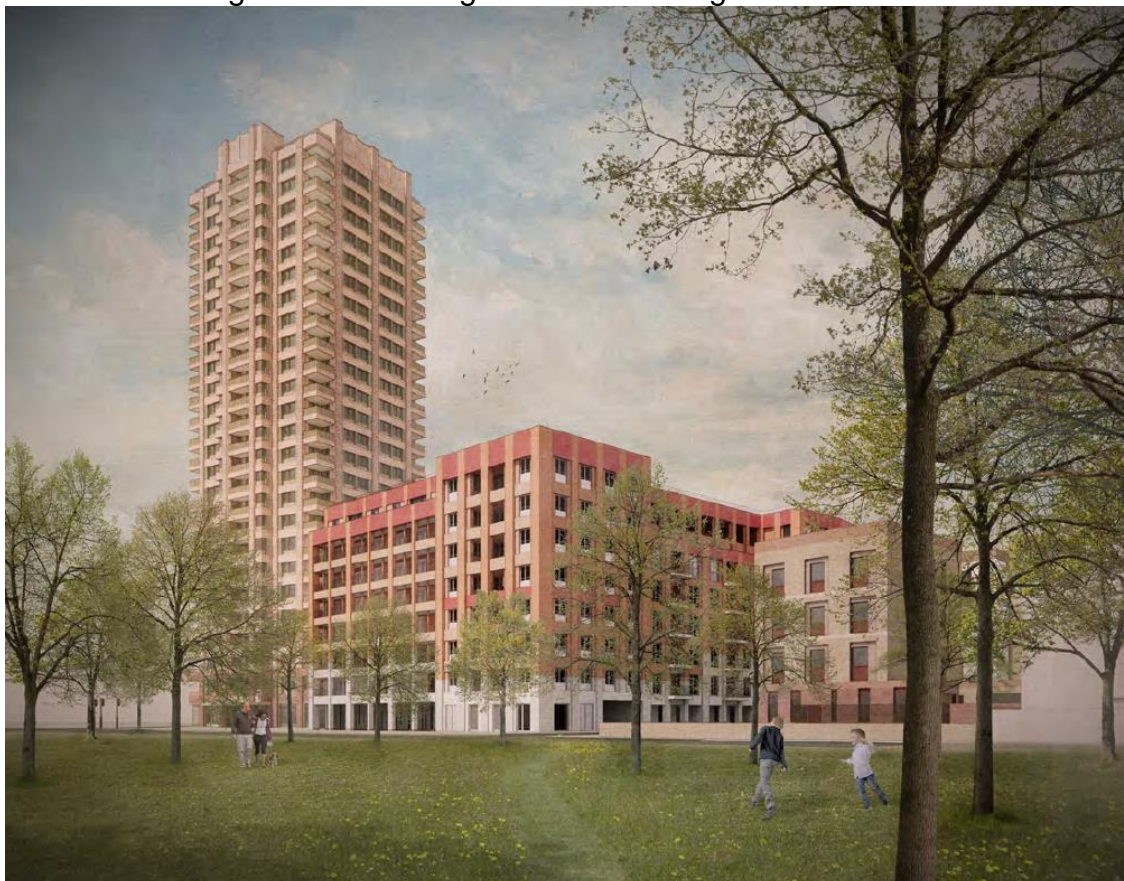


180. As a tall building, officers are of the view that the tower at 4A conforms with the council's policy P17 on tall buildings. It is exemplary by design, benefitting from the support of the Design Review Panel who only queried how the tower combines with the mansion block. The tower is located at a point of landmark significance - the confluence of important routes at the northern edge of Burgess Park. The function of this tall building, both providing a district landmark and symbol of the areas regeneration was posited in the Aylesbury AAP is contained in the Southwark Plan site allocation NSP01 and was adopted in the consented outline permission. Although taller than the building envisaged in the Southwark Plan and OPP, the building is considered to have a height that is proportionate to the significance of its location within the masterplan and the size of the site on which it is located. Whilst the buildings plan form has increased in size to meet fire safety requirements the increase in height has maintained its overall proportions, addressing the site allocation guidance that taller buildings on the site should be "elegant and slender".
181. The design includes a substantial and proportionate area of public space not limited to the area around the base of the tower and, when considered in the context of the whole development, includes the new public space on Thurlow Street as well as the new Bagshot Park. Whilst public access isn't provided at the top of the building, this is considered to be acceptable given that this is a

residential development with a need to provide security and privacy for the building's occupants. Finally, the views submitted with the application demonstrate that the tower is intended to cluster with a similar-scaled tall building on the western edge of Thurlow Street and would make a positive contribution to the local and wider London skyline.

182. The design of the junction between the tower and the mansion block was queried by the DRP. Whilst there was a difference of opinion among the panel members, the two options considered were to either introduce a meaningful recess or a gap between the two buildings in order to distinguish one from the other. Given the confines of the site and priority being the provision of new homes, the design was updated with in-set balconies arranged between the tower and the mansion block. This meaningful recess helps to provide the visual break that the DRP requested and is considered to distinguish the two buildings successfully and officers are satisfied that this has resolved the query previously raised by DRP, ensuring a successful junction between the tower and mansion block elements.
183. The C-shaped form of 4D combines successfully with 4A create a courtyard block with homes overlooking a shared communal amenity dedicated to the residents of the two blocks. Sub-plot 4B successfully manages the transition from the civic scale of Albany Road to the park frontage to the north. These two frontages of stacked maisonettes book-end the sub-plot and establish strong frontages and the link building on Haywood Street brings them together around the courtyard.

CGI view looking north from Burgess Park showing blocks 4D and 4A



184. Sub-Plot 4B is a splayed U-shaped block comprising stacked maisonette wings with apartments linking them. The block forms the southern edge of Bagshot Park and a key frontage onto Bagshot Street with a south-facing communal garden at the rear. It is designed as a warehouse-style block and presents an ordered lower-scaled backdrop to the new park.

View from Mina Road Looking west with plot 4B to the left.



185. Plot 5A is designed as a well-proportioned and highly articulated perimeter block with traditional bay features and an elevated ground floor to give the scheme an enduring appearance. The open courtyard is accessed from the public space on Thurlow Street and leads to a central court arranged on two levels. The ground floor offers access to the car and cycle facilities and includes a small courtyard for the community space at the base of the building. The generous courtyard provides ample communal amenity and is arranged on two levels. A lower court that offers access to the main lift cores and the community space, and two landscaped elevated gardens that provide communal gardens and play space for residents.

View looking north from Thurlow Square showing plot 5A.



186. Finally sub-plot 5C is a U-shaped block that forms the northern edge of the park. This block is defined by the gridded design of the south-facing balconies and decks. The block is arranged with a gentle fold at the centre to soften its appearance towards the park. At the rear between Faversham House and 5C a new landscaped courtyard will offer communal amenity for residents.

View looking west along Alvey Street showing plot 5C to the right and 5A in the background.



187. The housing is designed to meet and exceed the adopted standards with high quality homes and wheel-chair homes, a high level of dual aspect and doorstep play for all the age groups. The courtyard design of the perimeter blocks with street-facing doors and windows establishes a high level of natural surveillance while the more enclosed courtyard spaces at the centre of each sub-plot defines safe spaces that for play area and communal gardens.
188. Each architect has developed the design for each sub-plot and this has ensured that there is architectural variety across the development. At the same time, by using brick with reconstituted stone features as the main cladding material the development has ensured that the buildings will appear like a family of buildings and not a mishmash of architectural styles. 4A has been designed as a carved block with deep recesses, scallops and bays defining its aesthetic whilst 4C is a play on the brick surface with contrasting tone, weave and pattern becoming the language of the sub-plot. 4C takes the form of an elegant urban villa with a clearly defined base which contrasts well with the grander scale of 5C with its three-storey colonnaded frontage and canopied top-floor windows. Finally, 5A is a mansion block rooted in the heyday of this London typology with three-sided bays and balconies with a strong symmetrical arrangement that adapts to provide a strong backdrop to the places and spaces

it faces onto.

## Conclusion on Architectural design

189. The proposal is made up of a rich mix of architectural form and character with high quality materials and an ambition to make buildings that are functional and centred on the needs of residents. The result is not a uniform deployment of the London Urban Vernacular but a rich and varied townscape where each new building bends and adjusts to suit its place. In this way the blocks facing onto the busy Thurlow Street or Albany Road frontages are different to those that face onto Bagshot Park or Haywood Street. Officers are satisfied that the proposal meets and exceeds the exemplary design standards required by the council's suite of Architectural design policies.

## Heritage considerations

190. The site does not include any listed buildings and is not located within a conservation area. The nearest Listed buildings include the Grade II Listed Nos 20-54 Surrey Square (including the raised pavement) around 250m to the north of the site, and the Former Fire Station at 306-312 Old Kent Road approximately 350m to the east of the site.
191. A 500m radius from the site includes the Grade II Listed Aycliffe House and Nos 3-23 Portland Street; the Chumleigh Gardens Almshouses in Burgess Park; the Former Wells Way Baths building on Wells Way; the new Peckham Mosque and Nos 29 and 31 as well as 47-63 Cobourg Road. The nearest Conservation areas include the recently designated Thomas A'Beckett and High Street conservation area 250m to the north and east, and the Liverpool Grove conservation area around 350m to the west and north.
192. Regeneration developments, especially those that include tall buildings could affect heritage assets in the wider locality. Officers have considered their impact on the significance these sensitive heritage assets and their settings. This is both through their visual impact as well as the effect of the changes on their setting. Officers have concluded that there is no harmful impact arising on heritage assets. In all instances the significance of the listed buildings in their settings are unaffected. This is due in part to the substantial distance from the development site and also that all the identified heritage assets are appreciated primarily from the public domain and looking away from the development which is at least 200m to 250m to the rear of the viewer.
193. The only listed building where it might be possible to view the development together with its principal frontage, is the Former Wells Way Baths which is 500m to the south and west of the site with open views across Burgess Park to the site in the distant backdrop. Due to the significant separation, and the mature landscape of Burgess Park any incidental visibility of the development from Wells Way is not considered to cause any harm to the setting of this nationally important heritage asset. The tallest element of the development (the tower at plot 4A) is likely to be visible as a small feature in the distant backdrop over the mature treetops of the park and disappear behind the façade of the

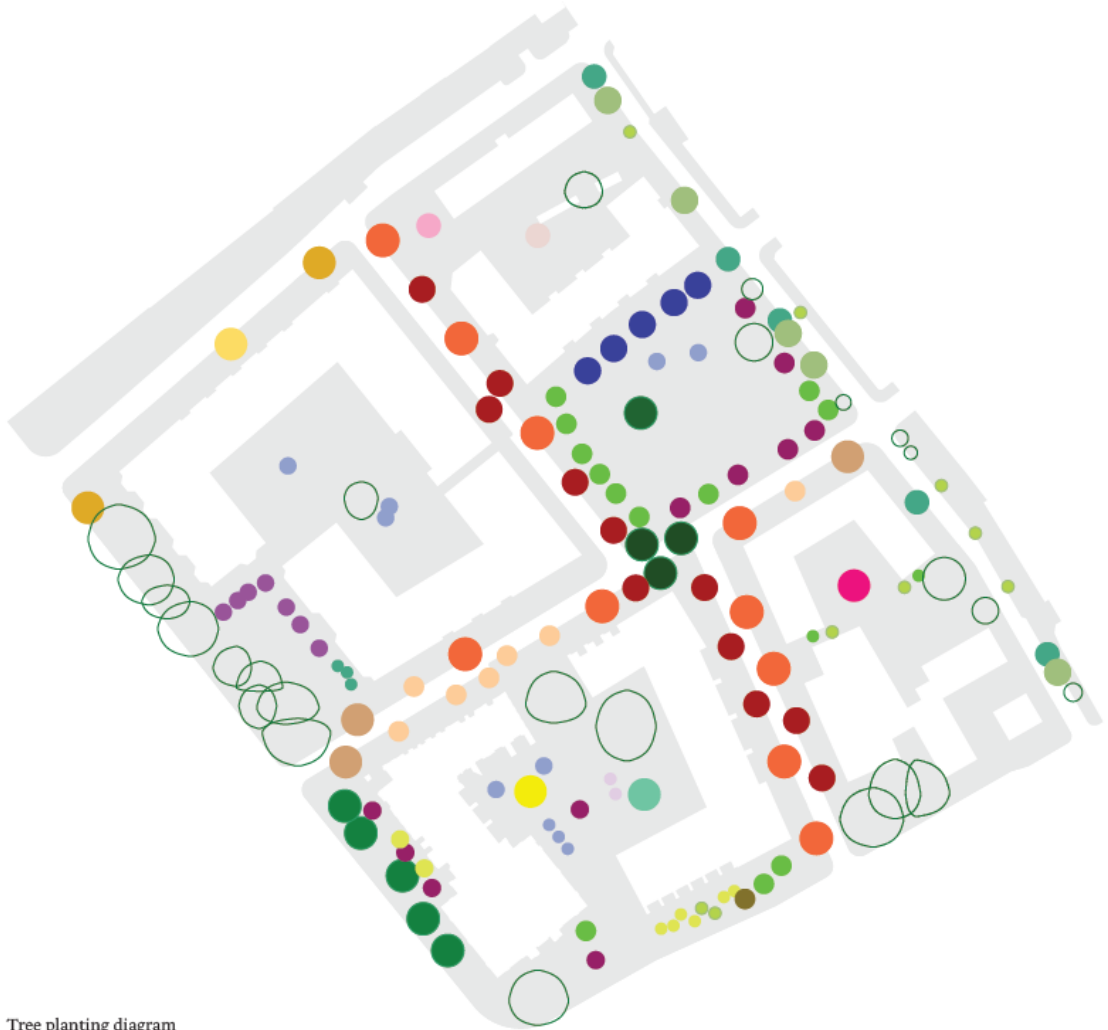
former Baths building as one approaches it.

194. The significance of the Liverpool Grove Conservation Area rests mainly with its cohesive pre-war residential townscape which can be appreciated from the streets. The conservation area is centred on the Grade I Listed St Pauls church and includes the areas immediately to the south and east of the church. The area is characterised by its cohesive pre-war terraced properties and mansion blocks arranged in east-west oriented streets and rising from the back edge of the pavement. Views from within the conservation area have been tested and demonstrate that the proposal will not be visible, and the setting of the conservation area is unaffected by the development which is over 350m away from the edge of the conservation area.
195. The significance of the Thomas A'Beckett and High Street Conservation Area rests mainly with its commercial frontage on the Old Kent Road, the mansion blocks that complement it and the historic townscape of surrounding residential streets. The substantial distance between this proposal and the most significant Old Kent Road frontage (especially the area around the junction of Albany Road and the Old Kent Road) coupled with the median scale of the proposed tower will mean that this scheme will not affect the character or appearance of the conservation area and will not cause any harm to its significance.
196. In conclusion, the proposal will have no harmful impact on the significance of the identified heritage assets and their settings.

### Landscaping, trees and urban greening

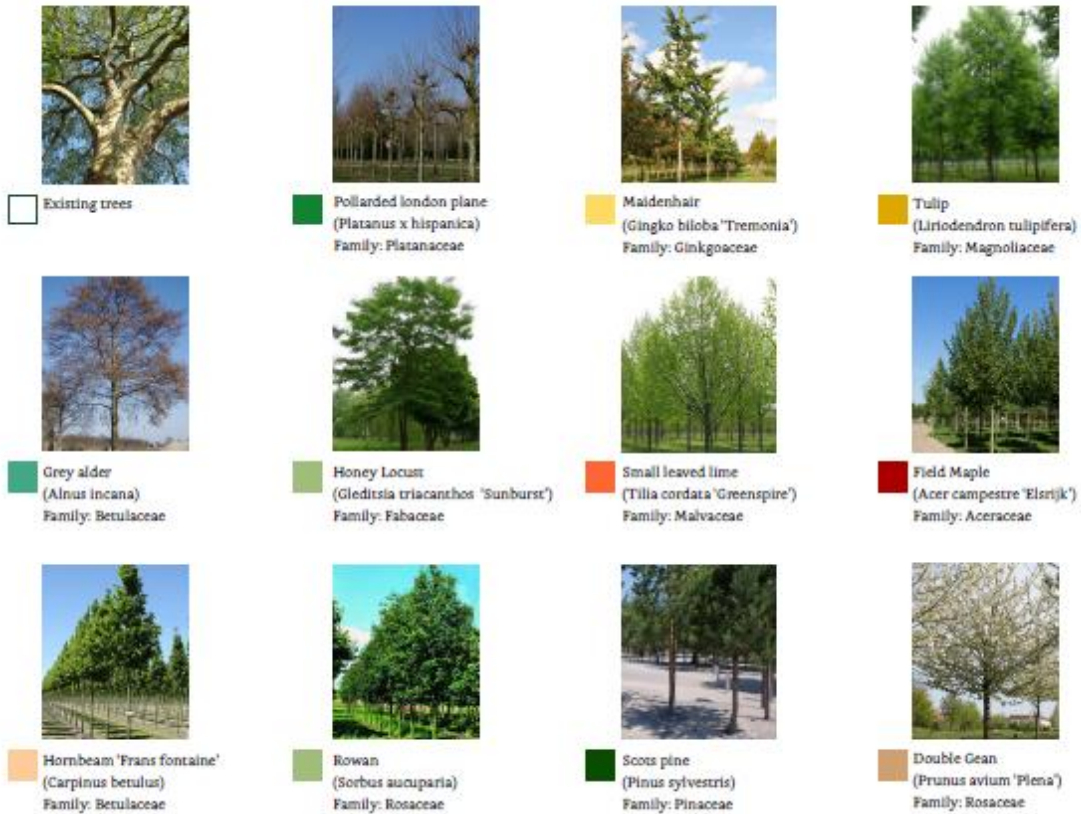
197. Policy G7 of the London Plan 'Trees and woodlands' states that development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees, there should be adequate replacement based on the existing value of the benefits of the trees removed. Policy P61 of the Southwark Plan states that development must retain and protect significant existing trees. It states that development must retain and enhance the borough's trees and canopy cover.
198. The site currently includes 14 category B trees, 19 Category C trees and 16 category U trees. No trees are protected by way of a Tree Preservation Order (TPO).
199. The proposed development would require the removal of two Category B trees, 14 Category C trees and 12 Category U trees. Emphasis is placed on retaining the high value, Category B trees along Thurlow Street with comprehensive replanting within the rest of the site. A total of 130 new trees would be planted throughout the site in addition to the retained Category B trees.
200. In relation to how the proposals impact on canopy cover, the existing tree canopy cover of the site equates to approximately 3,044 m<sup>2</sup> and the proposed total tree canopy cover would result in approximately 4,983m<sup>2</sup> of canopy cover, which would be a net gain of 1,939m<sup>2</sup> of tree canopy cover within the site. The tree planting strategy is shown on the image below.

# Tree Planting strategy



Tree planting diagram

### 1. Street Trees (Informed by LB Southwark's SSDM)



### 2. Burgess Park Edge Trees



### 3. Bagshot Park Trees



201. The above diagram shows how the proposal would provide a diverse mix of robust street trees with an extended boulevard of London Plane trees on Thurlow Street and native trees & species provided along Albany Road which would extend the Burgess Park character. The proposal would also provide trees within Bagshot Park which are characterised by a seasonal wetland character, line the swale edge and give the park a strong identity and deliver character trees with interesting characteristics including colourful flowering species marking key points of orientation.

202. The planting of any trees in the pavement would need to be agreed with the council's Highways Development Management Team.

## Landscaping

203. Policy G1 of the London Plan 'Green infrastructure' states that development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network. Green infrastructure is defined in the plan as comprising the network of parks, rivers, water spaces and green spaces, plus the green elements of the built environment such as street trees, green roofs and sustainable drainage systems. Policy G4 of the London Plan 'open space' states that development proposals should, where possible, create areas of publicly accessible open space, particularly in areas of deficiency. Policy P59 'Green Infrastructure of the Southwark Plan requires that major development must provide green infrastructure with arrangements in place for long term stewardship and maintenance and provide new publicly accessible open space and green links.

## Proposed Landscape site plan



204. The landscaping for the development would be focussed on the communal courtyard spaces, new public parks at Bagshot Park and Thurlow Square as well as the provision of tree lined streets and green roofs. All spaces would be generous and well landscaped with species of an appropriate nature and

maturity all of which would be agreed by condition with the council's Urban Forester.

205. The proposals would provide generous and high-quality open spaces for a mixture of functions including a large green open space known as Bagshot Park, which would be approximately 2,500sqm and more urban open spaces including Thurlow Square which would provide 1,200sqm of open space. In addition to this, the proposal would also deliver 4,275sqm of communal amenity space across the scheme. Officers consider these spaces to be a significant benefit of the scheme and would meet the requirements of the abovementioned policies.

### Urban Greening Factor

206. Policy G5 of the London Plan 'Urban greening' requires boroughs to develop their own urban greening factor (UGF) policies and sets an interim target score of 0.4 for developments which are predominantly residential. The site would achieve an Urban Greening Factor score of 0.393 which is only very marginally short of the 0.4 target, the UGF would be achieved through the inclusion of intensive green roofs, an attenuation swale, rain gardens, areas of semi-natural habitat planting, flowering and grass planting, permeable paving where possible and extensive tree planting.
207. The proposals seek to maximise the urban greening score in accordance with Policy G5, however the constraints within the proposed scheme (including the quantum of playspace required with non-permeable surface and the quantity of adoptable highway with a nonpermeable surface) mean it is not possible to achieve the interim target score of 0.4. Officers are satisfied that the score of 0.393 and the intensively landscaped spaces are a positive aspect of the scheme.

## Ecology and biodiversity

### Biodiversity Net Gain

208. 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.
209. 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.
210. However, Biodiversity net gain is only mandatory requirement for planning applications made after 12 February 2024. Applications made before this date are not subject to the mandatory biodiversity net gain requirements. As this application was originally made in July 2022, and whilst revisions have been

received, no decision has yet been made. Therefore, the application is not subject to the mandatory BNG requirements.

211. Notwithstanding this, Policy G6 of the London Plan 'Biodiversity and access to nature' states that SINC's should be protected. Where harm to a SINC is unavoidable and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the policy sets out a mitigation hierarchy which must be followed. The policy states that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.
212. At borough level policy P60 of the Southwark Plan 'Biodiversity' states that development must contribute to net gains in biodiversity including through enhancing the nature conservation value of SINC's, protecting and avoiding damage to SINC's, protected species and habitats, and including features such as green and brown roofs, green walls and soft landscaping.
213. The applicant has submitted a Biodiversity Net Gain Assessment which does use the mandatory net gain metrics. The submitted report notes that the proposals would result in a net loss of -24.72% in relation to habitat units, however a net gain of +301.56% in relation to hedgerow units.
214. It is noted that the application would fall below the net gain requirements of Policy P60 in relation to habitat units, however, the applicants have detailed that the reason for this shortfall, is largely due to the fact that the site is currently largely not occupied and there has been limited maintenance within the site, which has resulted in the existing biodiversity benchmark being higher than the previous assessment provided. The applicants have provided confirmation that should the previous benchmark be used from the initial 2022 survey, then the current proposals would result in a 54% net gain of habitat units.
215. All options to see where further increases in biodiversity could be achieved have been explored, however there is a need for a balance of provision of providing new homes, useable amenity space and playspace with the generation of habitat and biodiversity. Given that there is a shortfall in BNG, on site, a s106 contribution of £21,000 will be secured in order to facilitate new tree planting within the nearby Burgess Park. With this additional planting within Burgess Park, there would be an overall increase in biodiversity.
216. An Ecological Management Plan should be secured by condition alongside securing details of Bat and Swift bricks would be provided within the development by condition. The development would, as a result of this Net Gain benefit the ecology of the wider area including the adjacent Burgess Park SINC. The development is north of the park so overshadowing even by the tallest building would be limited.

### Design Review Panel

217. The Design Review Panel reviewed this proposal on two occasions, first in July

2021 to focus on the masterplan and public realm and then in December 2021 the form of a design charrette involving all five architects. The initial appraisal of the masterplan highlighted an issue with a stand-alone block and led to a re-design of sub-plot 5A. The amended masterplan was reviewed again in December 2021 when each sub-plot was considered in greater detail.

218. The Panel generally endorsed the place-making aspects of the proposal and supported the involvement of five architects on the site. In conclusion, they endorsed the direction of travel. They highlighted areas where further design development was required, including the flanks of the main plots, the design of the communal and private gardens in the development and the need to provide community facilities as part of the design.
219. The design was developed further from the time it was reviewed by the Panel in December 2021 to when it was submitted in July 2022. All the matters raised by the Panel have been addressed and Officers are satisfied that this is an exemplary proposal in design terms.
220. Following the revisions to the scheme, the proposals were not presented again to the DRP, as it was considered that the minor layout changes and small amendments to the scale of the development were not significant enough in order to require an additional review.

### Designing out crime

221. Policy D11 of the London Plan seeks to ensure appropriate design responses within developments in order to minimise opportunities for crime. It states that development should reduce the opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating.
222. As part of the pre-application process the applicant met with the Metropolitan Police's Designing Out Crime Officer. Guidance was provided in relation to a number of matters which have influenced the design of the scheme in relation to entrances, lobbies, doors, access to the courtyard, gates and cycle stores. The Metropolitan Police also responded to the formal consultation undertaken for this application. Within their response the design of the development has considered opportunity for natural surveillance, incorporates excellent lines of site and the development should 'activate' this area. These are all excellent crime prevention measures. The ground floor footprint has also been designed in such a way that there are no alcoves or secluded areas that are often crime and ASB generators. This, again, is extremely positive in relation to crime prevention.
223. They confirmed that submitted details would accord with the Secure by Design Principles, however noted that a condition should be included requiring the submission of a security management plan to include details of how the development meets the requirements of 'Secured by Design' principles.
224. A condition is included within recommendation which deals with this request and requires the submission of a management plan to be submitted and approved by the LPA in consultation with the Metropolitan Police.

## Fire safety

225. LP Policy D5 states that development proposals should be designed to incorporate safe and dignified emergency evacuation for all building users. In all developments, a minimum of one lift core should be suitably sized for fire evacuation. LP Policy D12 states that to ensure fire safety for all building users, all development proposals must achieve the highest standards of fire safety, inclusive of the requirements set out in policy. In addition, all major applications should be submitted together with a Fire Statement in accordance with the requirements set out in LP Policy D12.
226. The policy requires that the Fire Strategy statement should include information in terms of the building's construction, means of escape for all users, fire suppression features and measures that would reduce risk to life and injury. The strategy should also include details of how access would be provided for fire service personnel and equipment as well as provision for appliances to gain access to the building.
227. The proposals include a number of building plots with building heights ranging from 5-26 stories in height. All of the blocks with the exceptions of plots 4B and 5C would have a top storey exceeding 18m. As such, the remaining plots of 4A, 4D and 5C are considered as 'relevant buildings' for the purposes of the Fire Safety Regulations and are considered higher risk buildings.
228. Plot 4A is the tallest building proposed at approximately 77.8m in height to the top occupied storey. This building contains three stair cores, however from the 8<sup>th</sup> floor Core 1 terminates, with Cores 2 and 3 continuing to the top of the building at the 24<sup>th</sup> floor.
229. Plot 4D is an 8-storey building and sits at approximately 23m in height to the top occupied storey, with the building containing two stair cores. Plot 5A would be 10 stories at approximately 30m to the top floor level.
230. These buildings will be each served by two stair cores on all storeys. A firefighting and evacuation lift will be provided to the residential part of development which would comprise a firefighting stair, a firefighting lift, a smoke ventilated lobby and a dry riser within the stair.
231. Travel distances are in accordance with BS 9991. There are no areas of extended travel distance within the current design. There is appropriate sprinkler protection, fire detection and compartment floors throughout. Areas of higher fire risk such as plant rooms, waste stores and service risers which pass through compartment floors shall be fire separated from adjacent areas.
232. As set out in the submitted Fire Strategy, the fire safety of the proposed development and the fire safety information satisfy the requirements of London Plan Policy D12 and D5 and the functional requirements of the Building Regulations.
233. The Health and Safety Executive (HSE) were also consulted and concluded:

“Following a review of the information provided in the planning application, HSE is content with the fire safety design as set out in the project description, to the extent it affects land use planning considerations.”

234. For the above reasons, the proposals are considered acceptable in planning terms in relation to fire safety matters.

### **Archaeology**

235. Part D of LP Policy HC1 states that development proposals should identified assets of archaeological significance to inform the design and appropriate mitigation. In addition, SP Policy P23 sets out the requirements for archaeological findings on-site
236. The site is not located within an Archaeological Priority Zone and as such the proposals are unlikely to result in any significant impacts on archaeological remains within the site. However, as outlined by the Boroughs Archaeologist, the OPP contained a condition in relation to requiring Archaeological Building recording and recommends that this condition is carried over as part of any permission for full planning within the site.
237. These comments are noted, and the relevant condition has been added to the draft recommendation presented alongside this report.

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

238. Policy P56 of the Southwark Plan states that development should not be permitted when it causes an unacceptable loss of amenity to present or future occupiers or users. Amenity considerations which will be taken into account include privacy and outlook, overlooking, smell, noise, vibration, daylight, sunlight and wind microclimate impacts. The adopted Residential Design Standards SPD expands on policy and sets out guidance for protecting amenity in relation to privacy, daylight and sunlight.
239. Following consultation, neighbours expressed concern that they would be subjected to a loss of light, loss of privacy and increased noise. These issues are considered in more detail below.

### **Outlook and privacy**

240. The council’s Residential Design Standards SPD recommends a minimum of 21m between the rear elevation of properties, and a 12m separation distance between properties which face one another across a highway.
241. The proposed development would maintain or exceed the minimum distances as set out in the Southwark’s supplementary planning document, exceeding the 12 and 21m requirements between the development and existing residential properties surrounding the site and as such it is considered that there would be no significant adverse impact in terms of overlooking or loss of outlook.

## Daylight

242. Daylight and sunlight testing has been undertaken based on the Building Research Establishment (BRE) Guidance (2022). . The BRE Guidance provides a technical reference for the assessment of amenity relating to daylight, sunlight and overshadowing. The guidance within it is not mandatory and the advice within the guide should not be seen as an instrument of planning policy. The guidance notes that within dense urban environments a higher degree of obstruction may be unavoidable to match the height and proportion of existing/consented buildings. This site benefits from an allocation in the Southwark Plan that indicates that the use of the site could be intensified.
243. The BRE sets out the detailed daylight tests. The first is the Vertical Sky Component test (VSC), which is the most readily adopted. 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 about 20% of their original value before the loss is noticeable.
244. The second method is the No SkyLine (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 SkyLine between the existing and proposed situation. It advises that if there is a reduction of 20% in the area of sky visibility, daylight may be affected.
245. The daylight and sunlight assessment considered the potential impact on the following existing buildings:
- 1 Haywood Street (APF)
  - Domville Court
  - 47-53 Bagshot Street
  - 37 Bagshot Street
  - 35 Bagshot Street
  - 33 Bagshot Street
  - 31 Bagshot Street
  - 29 Bagshot Street
  - 25-27 Bagshot Street
  - 23 Bagshot Street
  - 21 Bagshot Street
  - 19 Bagshot Street
  - 17 Bagshot Street
  - 15 Bagshot Street
  - 1-28 Faversham House
  - 176-192 Wolverton

All other surrounding properties would not be impacted upon as a result of the proposed development.

246. There are currently 325 windows serving 248 residential habitable rooms surrounding the Project Site which are material for consideration in daylight terms. These have all been assessed in terms of both VSC and NSL. The results for VSC and NSL are set out in the two tables below:

**VSC Results:**

Address	Total windows assessed	Meet BRE guidance	Below BRE requirement			Total windows affected
			20-29.9% reduction (Minor)	20-29.9% reduction (Minor)	>40% reduction (Major)	
1 Haywood Street	49	33	3	7	6	16
Domville Court	32	24	2	3	3	8
47-53 Bagshot Street	54	35	12	1	6	19
37 Bagshot Street	18	18	0	0	0	0
35 Bagshot Street	3	3	0	0	0	0
33 Bagshot Street	2	2	0	0	0	0
31 Bagshot Street	2	3	0	0	0	0
29 Bagshot Street	2	3	0	0	0	0
25-27 Bagshot Street	15	15	0	0	0	0
23 Bagshot Street	2	0	0	2	0	2
21 Bagshot Street	3	0	0	0	3	3
19 Bagshot Street	3	0	0	0	3	3
17 Bagshot Street	3	0	0	1	2	3
15 Bagshot Street	3	0	1	2	0	3
109 Kinglake Street	12	12	0	0	0	0
1-28 Faversham	77	46	25	6	0	31
176-192 Wolverton	45	14	17	5	9	31

<b>Total</b>	<b>325</b>	<b>206</b>	<b>60</b>	<b>27</b>	<b>32</b>	<b>119</b>
--------------	------------	------------	-----------	-----------	-----------	------------

**NSL Results**

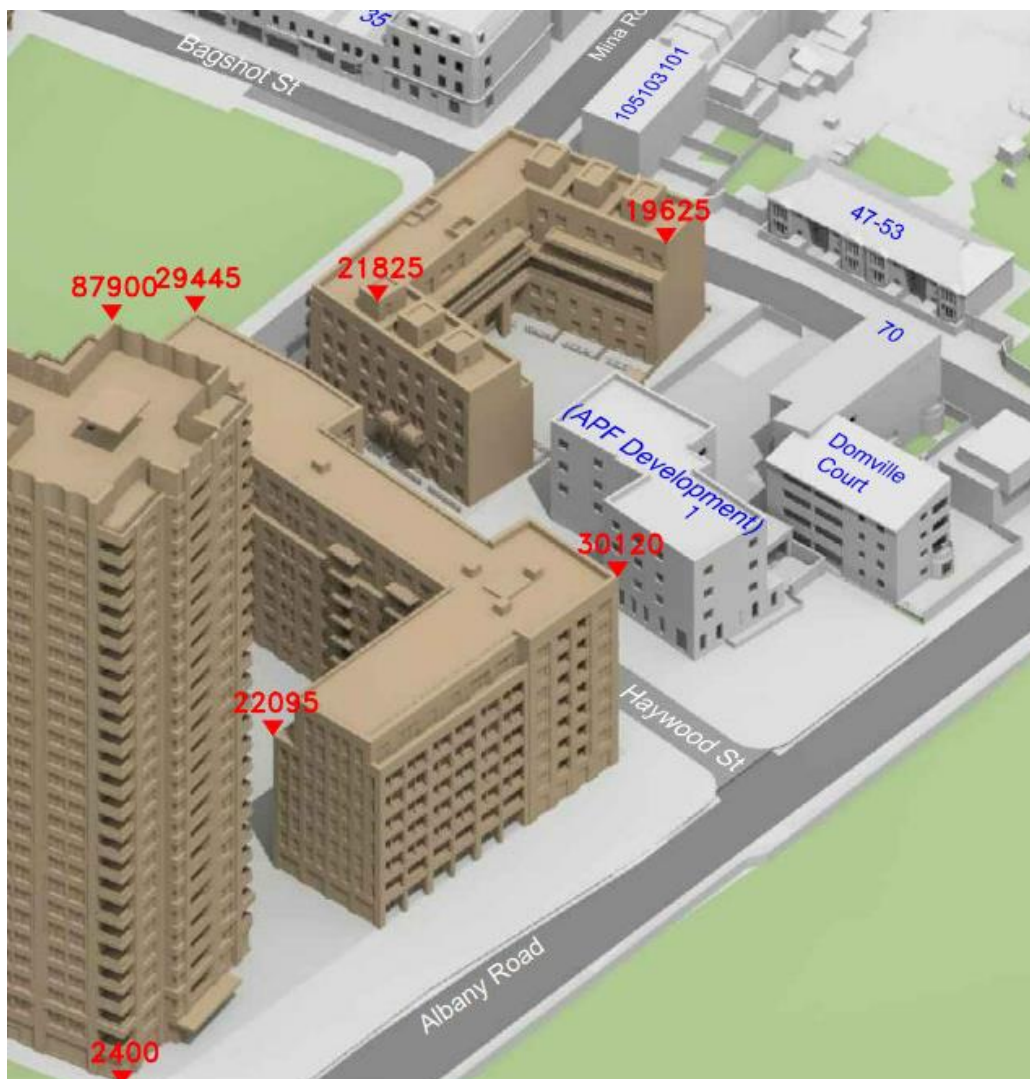
Address	Total rooms assessed	Meet BRE guidance	Below BRE requirement			Total windows affected
			20-29.9% reduction (Minor)	20-29.9% reduction (Minor)	>40% reduction (Major)	
1 Haywood Street	39	24	0	5	10	15
Domville Court	24	24	0	0	0	0
47-53 Bagshot Street	18	14	3	1	0	4
37 Bagshot Street	12	12	0	0	0	0
35 Bagshot Street	2	2	0	0	0	0
33 Bagshot Street	1	1	0	0	0	0
31 Bagshot Street	2	2	0	0	0	0
29 Bagshot Street	2	2	0	0	0	0
25-27 Bagshot Street	6	6	0	0	0	0
23 Bagshot Street	2	0	0	2	0	2
21 Bagshot Street	3	0	0	0	3	3
19 Bagshot Street	3	0	0	0	3	3
17 Bagshot Street	3	0	0	0	3	3
15 Bagshot Street	3	0	2	1	0	3
109 Kinglake Street	6	6	0	0	0	0
1-28 Faversham	77	52	12	5	8	25
176-192 Wolverton	45	15	2	4	24	30
<b>Total</b>	<b>248</b>	<b>160</b>	<b>19</b>	<b>18</b>	<b>51</b>	<b>88</b>

247. Of the assessed properties and groups of properties set out above, the seven properties listed below would have negligible daylight impacts and would remain compliant with the BRE guidance and are not considered further in this assessment. The remaining properties will be discussed in more detail.

- 37 Bagshot Street
- 35 Bagshot Street
- 33 Bagshot Street
- 31 Bagshot Street
- 29 Bagshot Street
- 25-27 Bagshot Street
- 109 Kinglake Street

### Haywood Street (APF)

248. A total of 49 windows serving 39 rooms have been assessed for VSC and NSL at this property which provides specialist temporary accommodation. The below diagram sets out the location of this property, in addition to the properties at Domville Court and 47-53 Bagshot Street.



249. When looking at the VSC impacts, the proposal would result in reductions to 33

windows that would be less than 20% and as such these windows would remain compliant with the BRE. Six windows would see a VSC reduction in excess of 40% which is considered a major effect. Seven windows would experience moderate effects with VSC reductions of between 30-39.9% and the remaining three windows would experience minor effects with VSC reductions of between 20-29.9%.

250. Regarding NSL, 24 of the 39 rooms assessed would remain BRE compliant. Of the affected rooms, five would experience moderate effects with reductions of between 30-39.9% and the remaining 10 would experience reductions of at least 40% which would be categorised as a major effect.
251. Whilst some of these reductions are significant, the majority of windows would have retained VSC levels which would exceed 18%, with seven windows retaining VSC levels between 12 and 18, with 3 windows receiving less than 12% VSC.
252. However, this is considered proportionate to the urban location and the fact that the APF was designed taking into account future development on Phase 2B. It should also be noted that the rooms would continue to achieve the ADF targets they were designed to. The overall effect on this property is considered to be acceptable.

### Domville Court

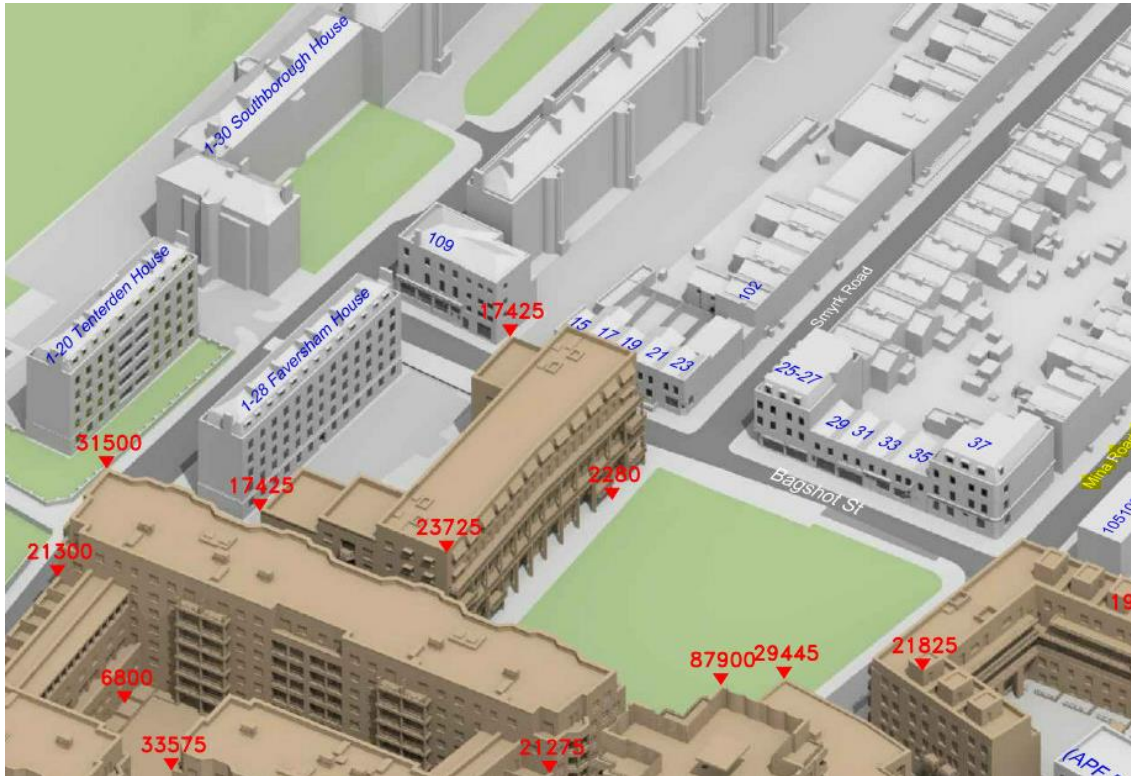
253. A total of 32 windows serving 24 rooms have been assessed for VSC and NSL at this property which consists of flatted dwellings.
254. In terms of VSC, 24 of the assessed windows would remain BRE compliant. Three windows would see VSC reduction in excess of 40% (up to 53%), which is considered a major effect. Three windows would experience moderate effects with VSC reductions of between 30-39.9% and the remaining two windows would experience minor effects with VSC reductions of between 20-29.9%. In terms of NSL, all 24 rooms assessed at Domville Court would remain fully compliant with the BRE.
255. All eight of the windows that would see the noticeable VSC impacts are located beneath access decks which themselves impact on the VSC levels achieved by the assessed windows. The BRE recognises that projections such as balconies or access decks can impact the typical daylight and sunlight tests and allows a separate analysis which considers the change in daylight and sunlight amenity without the projection in place. The applicant has undertaken this assessment, and, in this scenario, all 32 windows would remain BRE compliant for VSC.
256. Furthermore, all affected windows are located within rooms containing more than one window, with all rooms would comply with the NSL, demonstrating that each room would retain good levels of daylight. As such, the overall effect on this property is considered negligible.

### 47-53 Bagshot Street

257. A total of 54 windows serving 18 rooms have been assessed for VSC and NSL at this property which consists of flatted dwellings. Compliant VSC levels would be achieved at 35 windows. Of the remaining 19 windows, six windows would see VSC reduction in excess of 40% (up to 81%) which is considered a major effect. However, it should be noted that the real terms reduction in VSC for these three windows is 0.9% - 2%, with the proportionate impact being as a result of the low existing VSC. One window would experience moderate effects with VSC reductions of between 30-39.9% and again, the low baseline figures result in a disproportionate % loss with the actual real terms VSC loss being in the range of 0.7% - 3.9%. The remaining 12 windows would experience minor effects with VSC reductions of between 20-29.9%, however all bar one of these windows would have retained VSC levels of at least 22%. The remaining one windows proportionate impact again being as a result of the low existing VSC.
258. In terms of NSL, 14 of the 18 rooms assessed would remain BRE compliant. Three of the affected rooms would see reductions of between 20-29.9% and the remaining room would see a reduction of 31%. As such, a high proportion of rooms would remain BRE compliant for NSL meaning the majority of rooms would retain good access to daylight. The overall effect on this property is not considered to be significant.

### 23 Bagshot Street

259. Two windows serving two rooms have been assessed for both VSC and NSL at this property. Whilst there would be noticeable loss of VSC (moderate effect), the retained levels of VSC would be 18.9% and 19.9% respectively and this is considered acceptable for an urban location. In terms of NSL both rooms would experience a moderate effect with losses of between 30%-39.9%. Whilst the impacts here would be noticeable, the windows and rooms would still receive good levels of daylight. The overall effect on this property is considered to be minor. The below image shows the location of the properties along Bagshot Street, Faversham House and 109 Kinglake Street



## 21 Bagshot Street

260. Three windows serving three habitable rooms have been assessed at this property. All three windows would see major effects with VSC and NSL losses in excess of 40% and this would be categorised as a major effect. However, the three affected windows would retain VSC levels of 15.4%, 17.2% and 17.5%. The overall effect on this property would be moderate but the property would retain good levels of daylight for an urban environment such as this. Overall, the impacts are considered acceptable.

## 19 Bagshot Street

261. Three windows serving three habitable rooms have been assessed at this property. All three windows would see major effects with VSC and NSL losses in excess of 40% and this would be categorised as a major effect. However, the three affected windows would retain VSC levels of 15%, 17.1% and 17.4%. The overall effect on this property would be moderate but the property would retain good levels of daylight for an urban environment such as this. Overall, the impacts are considered acceptable.

## 17 Bagshot Street

262. Three windows serving three rooms have been assessed for VSC and NSL at this residential property. All three rooms would see NSL reductions in excess of 40%. Regarding VSC, whilst one window would see reductions of between 30-39.9% (moderate effect) and two would see reductions in excess of 40% (major effect), the retained VSC levels would be 15.6% at the ground floor window and 17.9%-18.7% at the upper-level windows. The overall effect on this property would be moderate but the property would retain good levels of daylight for an

urban environment such as this. Overall, the impacts are considered acceptable.

### 15 Bagshot Street

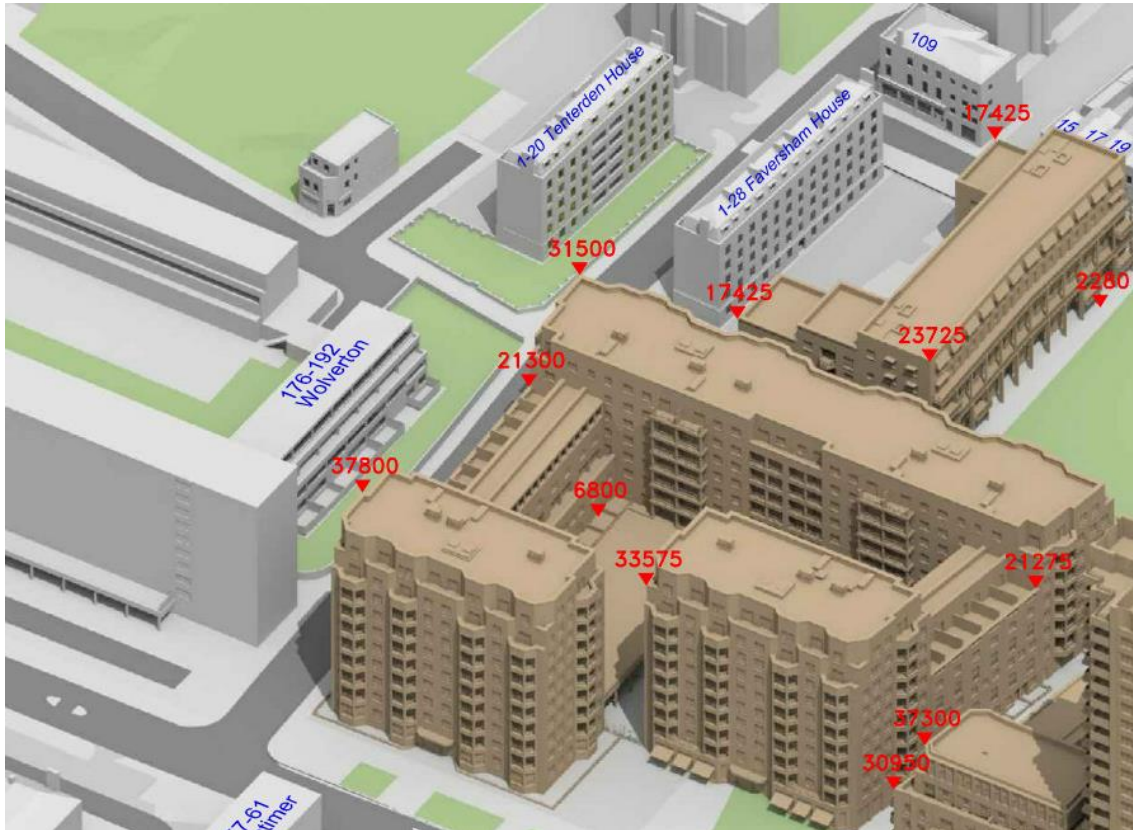
263. Three windows serving three rooms have been assessed for VSC and NSL at this residential property. Two rooms assessed for NSL would see reductions of between 20%-29.9% which would be a minor effect, and the remaining room would experience a moderate effect with NSL reduction of between 30%-39.9%. One window would see a minor effect with a VSC reduction of 29%. The remaining two windows would experience moderate effects with VSC reductions of 34% and 35%. The retained VSC levels would be 18.5%, 20.1% and 21.3%. The overall effect on this property would be moderate but the property would retain good levels of daylight for an urban environment such as this. Overall, the impacts are considered acceptable.

### 1-28 Faversham House

264. A total 77 windows have been assessed for VSC at this property and 46 of them would remain BRE compliant with 25 windows experiencing losses of between 20%-29.9% which would be a minor effect and the remaining six windows experiencing losses of between 30%-39.9% which would be a moderate effect. Retained VSC levels of between 18% and 27% would be achieved at 27 of the affected windows whilst the remaining window would retain a VSC level of at least 16.7%. Despite the VSC losses, all retained VSC levels are considered appropriate for an urban area.
265. In terms of NSL, 52 of the 77 rooms would remain BRE compliant whilst 12 rooms would see reductions of between 20%-29.9% which would be a minor effect. Five rooms would experience a moderate effect with reductions of between 30%-39.9% and the remaining eight rooms would experience major effects with losses in excess of 40%. However, given the retained VSC levels, the overall effect on this property would not be considered significant.

### 176-192 Wolverton

266. VSC has been considered at 45 windows at this property. Likewise, NSL has been considered at 45 rooms. The below image shows the location of the 176-192 Wolverton Building.



267. A total of 17 windows would experience proportional reductions of between 20% and 30%, five windows would experience proportional reductions between 30% and 40% and nine windows would experience proportional reductions over 40%. The 22 windows that would experience proportional reductions of between 20% and 40%, will retain VSC values of between 17.3% and 21.8% which are considered acceptable for an urban location. The remaining nine windows are first and second floor windows that are recessed to form inset balconies and if this feature is removed and the VSC is measured on the façade, the retained VSC levels would be over 17%.
268. It is noted that 24 rooms assessed for NSL would experience reductions in excess of 40% however, given the retained VSC values and the fact that this building is due to be demolished as part of the OPP, the overall impact is considered acceptable, and the effect would not be significant.

## Sunlight

269. In relation to sunlight, the BRE recommends that the APSH received at a given window in the proposed case should be at least 25 % of the total available, including at least 5 % in winter. Where the proposed values fall short of these, and the absolute loss is greater than 4 %, then the proposed values should not be less than 0.8 times their previous value in each period. The BRE guidelines state that, “[...] all main living rooms of dwellings, and conservatories, should be checked if they have a window facing within 90 degrees of due south. Kitchens and bedrooms are less important, although care should be taken not to block out too much sun”. The APSH figures are calculated for each window, and where a room is served by more than one window the contribution of each is accounted for in the overall figures for the room.

270. Sunlight (APSH and WPSH) has been assessed at 17 properties and impacts have been identified at three properties. The remaining properties, along Bagshot Street are fully compliant with the BRE Guidance. The properties impacted will be discussed below:

### 1 Haywood Street (APF)

271. Due to their location within 90 degrees of due south, there are 27 windows that have been assessed for sunlight. A total of 24 windows would remain BRE compliant in both the winter and total APSH scenarios. Two of the remaining three rooms would remain compliant in terms of total APSH but would fall below the BRE target for winter sun. One window would fail to meet both the APSH and winter sunlight hours. However, these rooms affect bedrooms which are less sensitive, and the nature of the accommodation is temporary. The impact is considered acceptable, and the effect would be negligible.

### 1-28 Faversham House

272. Of the 77 rooms assessed for sunlight, 68 would remain BRE compliant in both the winter and total APSH scenarios. The remaining eight rooms would be BRE compliant in terms of total APSH but would fall below the BRE target for winter PSH. The overall impact is considered acceptable given the small number of rooms affected in winter and the fact that these rooms would remain compliant in terms of total APSH. The overall effect is not considered to be significant.

### 176-192 Wolverton

273. As detailed previously, this building is only partially occupied and is due to be demolished under the OPP. A total of 45 rooms have been considered for sunlight at this property and 30 would remain compliant in terms of both winter and total APSH. A total of six rooms would remain compliant in terms of total APSH and nine would see losses in both winter and total APSH. These rooms look out into recessed balconies and following the rational of removing the obstruction (either balcony or access deck or any other type of overhanging projection), the 45 assessed rooms would comply with the BRE in terms of APSH. Given the above, the impacts on these properties are not considered to be significant.

### Overshadowing of amenity spaces

274. The BRE suggests that to appear adequately sunlit throughout the year, at least half of a garden or amenity area should receive at least two hours of sunlight on 21 March. 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 sun on 21 March is less than 0.8 times its former value, then the loss of sunlight is likely to be noticeable.

275. The applicant has considered the impact of the development on overshadowing of 39 existing surrounding amenity spaces. Four amenity spaces would see

increases in the availability of sunlight which is positive. A total of 29 spaces would see a negligible impact on the percentage of area achieving two hours of sunlight. The results are set out in the diagram below. The remaining amenity spaces are considered below in detail.



276. 189 Wolverton and the communal amenity of 176-192 Wolverton will continue to achieve 2 hours of sunlight to over 50% of their area on the 21st March, despite a reduction in sunlit area of more than 20%. This is considered to be a negligible effect. 176 and 179 Wolverton would not meet the BRE guidelines. The affected gardens are very small and appear to be mainly shaded by their boundary fences. As such, whilst the proportional reduction would be more than 65%, the absolute change in sq. metres would only be up to 3.2sqm which is considered to be small. It is also worth noting that Wolverton would be demolished under Phase 2C of the OPP and a number of the ground floor units are already vacant and have their windows boarded up. The effect whilst moderate adverse, would be temporary and as such is considered acceptable.
277. The amenity space of 21 Bagshot Street receives two hours of sunlight to 0.3% of its area on the 21st of March as existing. With the development in place, this would be reduced to 0, a loss of 0.3% which is considered negligible. The amenity space at 1 Haywood Street (APF) would not meet the BRE guidelines when the development is completed. However, it should be noted that the APF was designed around the masterplan and as such the sunlight impact was anticipated. Given the nature of the amenity space (smoking area versus garden), the level of impact is considered acceptable.

### Conclusion on daylight and sunlight

278. Overall, the effect of the proposed development on the daylight and sunlight to the surrounding properties are considered acceptable, with these buildings

generally still achieving good access to daylight and sunlight for sites within an urban location such as this.

## Noise and vibration

279. The ES and ES addendum considers the potential for noise and vibration impacts during demolition, construction and operation of the development. This is reported within Chapter 9 of the ES which considers the following scenarios:
- Noise and vibration from the demolition and construction work associated with the development;
  - Noise from road traffic associated with the demolition and construction work associated with the development;
  - Noise from changes in road traffic attributed to the completed development;
  - Noise from items of plant within the Temporary Energy Centre introduced during the demolition and construction work associated with the development, and
  - Noise from items of permanent fixed plant introduced as part of the completed development.
280. Sensitive receptors for noise and vibration impacts are properties outside the Aylesbury Estate that have an unobstructed view of the development site; properties outside the Aylesbury which share an immediate boundary, such as those properties on Kinglake Street and Bagshot Street; Existing estate properties located on adjacent phases such as Phase 2C to the north and Phase 4 to the west; existing properties within Phase 2b that may still be occupied when works commence; and new properties that may become occupied whilst construction works are ongoing.
281. During demolition and construction there are anticipated to be increases in airborne noise and vibration levels as a result of the proposed works. The most significant vibration would be associated with piling and for the proposed development.
282. The development would be required to comply with Southwark's Technical Guidance for Demolition and Construction which would require noise and vibration levels to be below a level at which they would be classed as not significant for a temporary period. This would be secured through a Demolition and Construction Environmental Management Plan. This would also cover construction traffic.
283. Temporary plant and equipment used during the construction and demolition works has been assessed as well as permanent plant that would serve the operational development. Maximum sound power levels would be set for plant in each plant location in order to limit plant noise at the associated façade and thereby limit noise to sensitive receptors. The noise levels would be classed as not significant.
284. With these mitigation measures in place, including plant noise mitigated so as not to exceed the given limits, all noise and vibration effects associated with the Project are not considered to be significant.

285. As such, subject to suitable noise and vibration mitigation measures which are proposed via conditions for each of the phases, the proposal would ensure a suitable environment for the future occupiers of the site.
286. In relation to the noise impacts of the proposals on the end users of the development, the proposals include 450sqm of flexible E/F-class uses, however it is unlikely that these would be significant noise generating uses that would cause significant harm to the residential uses within the site, subject to suitable conditions.
287. The proposals would also include permanent plant equipment within the development, however, the scale of which are not significant that would significantly impact on surrounding residents or future residents within the site.
288. As such, subject to conditions in relation to details of plant machinery, sound insulation and restriction on delivery and servicing hours to ensure that hours of servicing and delivery, the proposals are not expected to have significant impacts on surrounding or future residents and as such, the proposal would ensure a suitable environment for residents.

## **Transport and highways**

289. Chapter 9 of the NPPF seeks to ensure that transport issues are properly addressed as part of development proposals. Proposals must assess the impact upon existing transport networks, promote and maximise opportunities for sustainable transport modes whilst mitigating any adverse transport related environmental effects and must make a significant contribution to improving accessible movement and permeability as a key priority for place making. Paragraph 116 states “development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe”.
290. This approach is reflected in Chapter 10 of the London Plan and Southwark Plan Policies P49 – P55, which require development proposals to maximise sustainable modes of transport by minimising car journeys, to deliver enhanced walking and cycling opportunities and safe, accessible routes to public transport. Developments should be car free save for disabled parking provision and mitigation will be secured where necessary to address impacts upon the road and public transport networks to serve new developments.
291. This application is accompanied by a Transport Assessment and subsequent ES addendum transport has been fully considered as part of the ES under chapter 11 – Transportation. The documents have been reviewed by the council’s Transport Policy and Highways Teams, and Transport for London (TfL).
292. The site has a Public Transport Accessibility Level (PTAL) of 4 (medium) with the primary form of public transport being buses along Albany Road, Thurlow Street and the further to the east on Old Kent Road and to the west on Walworth Road/Camberwell Road. The nearest part of the Transport for

London Road Network (TLRN) is the Old Kent Road, approximately 500 metres to the east of the site. The site records a public transport accessibility level (PTAL) of 2-4 on a scale of 0-6b where 6b represents the most accessible locations. The site is primarily accessed by bus services on Thurlow Street and Albany Road, which provide links to London Underground and National Rail services at Elephant and Castle. The site is well located for the Strategic Cycle Network, being close to Cycleway 7 on Portland Street.

293. The footway adjoining this site on Albany Road connects with the pedestrian/cycle routes along Burgess Park at its proximate southern side and This site is also surrounded by various cycle routes including the National Cycle Network and Quietways. There are a few pedestrian safety measures in this vicinity, demonstrated by signalised crossings on two of the arms of Albany Road/Thurlow Street junction, a raised zebra crossing on each of the stretches of Albany Road and Thurlow Street flanking this development plus a raised entry treatment at Albany Road/Bagshot Street junction and a zebra crossing at the eastern side of this intersection.

### Trip generation

294. The applicant's Transport Assessment and TRICS database have been reviewed and demonstrate that the residential aspect of this development would generate a total of 380 trips within the am peak and 285 within the pm peak. This would be a net increase from the previous scheme presented to members of 20 am peak trips and 15 pm peak trips, which is considered a marginal increase beyond the previous scheme which would be accommodated within the surrounding transport network.
295. Of these trips, there would be 83 and 63 two-way car vehicle movements in the morning or evening peak hours. As such, the vast majority of the trips predicted would be by sustainable transport, with majority of these trips, equating to 74.7% within the am and 74.4% within the pm peak, by public transport, walking or cycling.
296. The S106 on the OPP secured funding for public transport improvements towards buses, and it is considered appropriate that these costs are apportioned to the current application in order to ensure delivery. A contribution of 340,454 is required in accordance with the OPP. Additional mitigation/travel plan measures proposed include the provision of cycling shower /change facilities, travel information and appointment of a travel plan co-ordinator who would promote sustainable travel including organising and publicising sustainable travel events in addition to monitoring the travel plan. A Construction Logistics Plan, Demolition and Environmental Management Plan and Travel Plan would be secured in the S106 Agreement alongside the aforementioned contributions.

### Servicing and deliveries

297. Access to the development would be legible and rational with Albany Road and Thurlow Street providing the main street frontages and additional street frontages on Bagshot Street, Mina Road, Haywood Street and the extended

Alvey Street. Servicing of blocks would be from adjacent bays on the street frontages.

298. Delivery and servicing arrangements for the development are broadly in line with the OPP. The trip generation assessment indicates that the proposed uplift in units would result in a negligible increase in delivery and servicing trips. A detailed Delivery and Servicing Plan would be secured by condition.

Image - Servicing arrangements:



## Refuse storage arrangements

299. Each residential unit, core and floor within the buildings has been designed to minimise refuse carry distances for residents to bring waste from their unit to the bin storage/holding area, with the vast majority of homes within the required 30m distance from the cores to the refuse storage areas. All bin stores will provide for general waste, recycling, bulky waste and food waste and would be located within 10m of waste collection locations, where dropped curbs would be provided to enable loading of waste.

## Car parking

300. The AAAP set a maximum ratio of 0.4 car parking spaces per unit. Policy P54 (Car Parking) of the Southwark Plan sets a maximum ratio of 0.25 parking spaces per unit. Walworth CPZ provides adequate parking control in this locality weekdays from 08:30hrs to 18:30hrs.
301. The applicant proposes a total of 83 car parking spaces, consisting of 45 on-plot car parking spaces and 38 on street spaces which would equate to a provision of approximately 0.13 spaces per dwelling, which would meet the requirements of Policy P54. This would include a total of 31 blue badge spaces which equates to approximately 4.8% of the total number of dwellings and would exceed the NSP and TfL requirements for 3% to be provided on site from day one.
302. The proposed development will provide a minimum of 20% of the parking spaces across the two private parking areas with electric vehicle charging points. The remaining spaces will have passive provision for electric vehicle charging.
303. Policy P54 of the NSP 'Car parking' requires developments to provide a minimum of three years free membership, per eligible adult who is the primary occupier of the development, to a car club if a car club bay is located within 850m of the development; and / or contribute towards the provision of new car club bays proportionate to the size and scale of the development if it creates 80 units or more. The proposal would provide for 6 car club bays
304. Appropriate obligations would be imposed to exempt non-returning residents from obtaining parking permits as well as conditions to secure electric vehicle charging points and planning obligations to provide future residents with free membership to a car club. A car parking management plan will also be conditioned in order to ensure that the parking spaces are managed appropriately.

## Cycle parking and cycling facilities

305. The applicants are proposing a total of 1,299 long-stay cycle parking spaces will include 138 more long stay cycle parking spaces than required by the London Plan and Southwark Plan 2022, ensuring that the development encourages the use of cycling as a sustainable mode of transport and is future-

proofed for the potential growth of cycling in the local area. A range of different cycle spaces are provided with Sheffield stands, two tier stands and cargo bike stands

306. The proposal would also accommodate 66 short-stay cycle parking spaces within the public realm of the development, which would fall slightly short of the Southwark Plan requirement of 89 spaces but would accord with the London Plan. Given the over-provision of long stay spaces and provision of the cycle hire docking station as noted below, this is considered acceptable.
307. However, as the applicants note, a cycle hire docking station is also due to be delivered as part of this phase which would accommodate 30 cycles hire spaces which was a requirement of the OPP. This obligation would now be required to be met under the current application and would be included within the S106 agreement with any costs above those established under the OPP index linked to the date of the OPP.
308. New routes would be created through the proposals with an extension of Mina Road through to Thurlow Street in addition to the new north/south link along Haywood Street. This would provide significant improvements to cycle and pedestrian movements through the site which is supported by officers. Furthermore, S278 works would also be secured through the S106 agreement to secure cycle improvements to deliver the 'Southwark Spine' cycleway along Thurlow Street.

### Transport environmental impacts and management

309. The ES considers transport impacts during demolition/construction as well as the completed/operational phase of the development. The main impacts of demolition and construction activities on the transport network relate to the increase in HGV movements associated with the works. The peak period of construction is expected to see up to 100 HGV movements and 58 light vehicle movements per day. These movements are likely to have temporary effects on driver/pedestrian/cycle delay and would have a minor adverse but temporary effect. In order to mitigate some of these impacts, a Construction Environmental Impact Assessment (CEMP) would be conditioned.
310. Once completed, the development would result in an increase in population within the site and there would be an associated increase in traffic movements. Many of these movements would be by foot, bike or public transport due to the sites location and the low level of parking provided. This would be a negligible effect.
311. Once operational, the vehicle movements associated with the development would be low and do not require mitigation. The development would however result in some beneficial impacts as a result of new routes for cyclists and pedestrians, improved connectivity and legibility, a new cycle hire docking station and improvements to public transport.

## Environmental matters

### Flood risk and Drainage

#### Site Context

312. The application site is located within Flood Risk Zone 3A and the main source of flood risk in Southwark is as a result of tidal activity within the River Thames. It should be noted that the site would benefit from protection by the Thames Barrier up to the 1 in 1000-year flood event.
313. The NPPF 2024 states that planning decisions must take into account the current and long-term implications for flood risk in order to minimise the vulnerability of communities and improve resilience. Where development is necessary in higher risk areas, development should be made safe for its lifetime without increasing flood risk elsewhere. Certain steps need to be followed when reaching a planning decision on development in higher risk areas, with risks managed through suitable adaptation measures.
314. Policy SI 12 of the London Plan 'Flood risk management' states that development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. Policy P68 of the Southwark Plan 'Reducing flood risk' states that development must not increase flood risk on or off site and sets out the requirements for achieving this. This includes that finished floor levels are set no lower than 300mm above the predicted maximum water level where they are located within an area at risk of flooding.
315. The site is located in Flood Zone 3 as identified by the Environment Agency flood map, which indicates a high probability of flooding. Paragraph 170 of the NPPF advises that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. In line with the NPPF, the council has a Strategic Flood Risk Assessment which acknowledges that development within flood zone 3 is required and is allowed with the application of the Exception Test set out the NPPF.
316. Paragraph 178 of the NPPF sets out that the need for the exception test will depend on the potential vulnerability of the site and of the proposed development, in line with the Flood Risk Vulnerability Classification set out in national planning guidance. The proposed development would contain some ground floor homes and parking at basement levels which are classified as 'more vulnerable' uses under the NPPF.
317. For the Exception Test to be passed it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk, and that a site-specific flood risk assessment must demonstrate that no adverse impacts would occur. Where planning applications come forward on sites allocated in the development plan through the sequential

test, applicants need not apply the sequential test again. However, the exception test may need to be reapplied if relevant aspects of the proposal had not been considered when the test was applied at the plan-making stage, or if more recent information about existing or potential flood risk should be taken into account.

318. Although the site is allocated for development in the Southwark Plan, the proposed development includes residential accommodation at ground level of the buildings. The exception test therefore needs to be applied. The site is located on previously developed land and there are strong sustainability reasons why it should be redeveloped. The development of brownfield sites such as this will be necessary if accommodation is to be provided to meet the current shortfall in housing in the area. The site is allocated for mixed-use development including housing in the Southwark Plan, and the proposed design is capable of providing good quality housing.
319. The issue of water resources has been considered as part of the ES and the results are set out in Chapter 12 of the main document, and subsequent updated within the ES Addendum. This assessment considered the impact of the development with regards to water resources, water quality, flood risk and drainage. The assessment looked at potential significant effects that could arise during demolition/construction and the operational phase of the development with regards to surface water drainage, flood risk, surface water quality and surface water/foul sewage capacity.
320. A site-specific Flood Risk Assessment and SUDS (Sustainable Urban Drainage) Strategy has been submitted with the application. With regard to river and tidal flooding, the FRA advises that the risk to the site is low owing to the flood defences on the River Thames.
321. The Environment Agency and Thames Water have been consulted on the proposed development and have recommended conditions that would be required to be discharged prior to the commencement of any development (with the exception of demolition). Alongside a condition for a Demolition and Construction Environmental Management Plan, these conditions would control impacts during this phase of development and would assist in mitigating/controlling any impacts.
322. The surface water drainage is proposed to connect to the public combined sewer in Bagshot Street via the existing drain located to the east. The discharge rate from the proposed development will be restricted to the equivalent greenfield runoff rate for the 2, 30 and 100 year plus climate change storm events by a complex flow control device. Attenuation will be provided by a below ground attenuation tank and swale with underdrain with additional SuDS components including green roofs, a swale, permeable paving and tree pits. The system has been designed to accommodate all storms up to and including the 100 year + 40% climate change storm event.
323. All proposed mitigation measures are considered proportionate and appropriate to ensure no significant effects would be caused as a result of the development.

## Land contamination

324. Ground conditions have been considered and reported in Chapter 18 of the ES and considers the effects of the demolition and construction and operational development on workers, site users, soil and water. The geology at the site consists of gravels overlying sands and chalk. Made Ground is also known to be present on site up to depths of approximately 5m. The superficial deposits comprise a Secondary A aquifer and the solid geology Lambeth Group and Thanet Sands as a Secondary A aquifer. The underlying White Chalk Subgroup is classified as a Principal Aquifer. There is one known active groundwater abstraction point 992m southwest of the site.
325. The site has previously been assessed with regards to ground conditions and contamination as part of the OPP and was found to be acceptable, however it is noted that the proposed works have the potential to impact on demolition and construction workers, off-site human health receptors (residents and workers in the vicinity of the Project Site) and water bodies in the vicinity of the site as a result of interactions with potential existing contamination at or near to the site. The following mitigation is therefore proposed:
- Further intrusive Site Investigation and Remediation Strategy (by condition);
  - UXO mitigation;
  - Materials Management Plan;
  - Piling Risk Assessment;
  - Basement Impact Assessment (by condition) and
  - Measures set out in CEMP, to include, water spray to damp down any potentially contaminated dust, wheel washing facilities, covered stockpiles, and fuel storage onsite to be carried out under best practice.
326. With the appropriate mitigation in place, the development is likely to result in negligible and therefore not significant effects on workers, residents and visitors. Conditions are recommended to cover these mitigation requirements which are noted above.

## Air quality

327. The site sits within an air quality management area. Policy SI 1 of the London Plan 'Improving Air Quality' seeks to minimise the impact of development on air quality and sets a number of requirements including minimising exposure to existing poor air quality, reducing emissions from the demolition and construction of buildings, being at least 'air quality neutral', and not leading to a deterioration in air quality. For large-scale, outline applications that are subject to EIA, an Air Quality Positive Statement should be submitted which details how benefits to local air quality have been maximised and measures to minimise pollution exposure have been minimised.
328. This is echoed within the Local Plan Policy P65 - Improving air quality which outlines that Developments must achieve or exceed air quality neutral

standards; and address the impacts of poor air quality on building occupiers and public realm users by reducing exposure to and mitigating the effects of poor air quality.

329. The impact of the development on air quality has been assessed as part of the ES and the results of this assessment are reported in Chapter 6 of the ES, and subsequent addendum. The ES considered both the impacts of the demolition and construction, and the operational phases of the development.
330. During the demolition and construction phase, the impacts from PM10 and dust were assessed with regards to current LBS, GLA and IAQM guidance. The ES states that mitigation would be required to ensure no significant dust and PM10 impacts during this phase. Appropriate mitigation in this instance would be a DEMP and CEMP and these would be secured by conditions that would be attached to any consent issued.
331. Road traffic emissions were considered during the construction phase for NO<sub>2</sub>, PM10 and PM2.5 concentrations, again having regard for the appropriate guidance. The ES determined these impacts to be negligible with no significant adverse effects.
332. The ES addendum outlines that the changes in massing to the proposal since submission would not change the findings of the original Air Quality assessment within the original ES and that no further mitigation beyond those measures previously proposed are required.
333. The potential air quality impacts on NO<sub>2</sub>, PM10 and PM2.5 concentrations due to road emissions in the operational phase were assessed. These impacts were determined to be negligible, with no significant effect (even assuming worst-case boiler operations to provide 100% of the heat and hot water demand). With regard to the London Plan Policy SI 1, the Project was determined to be air quality positive, in accordance with the Mayor of London's guidance.

## Wind and microclimate

334. Wind microclimate has been considered as part of the ES and the results are set out in Chapter 13 of the ES and within the ES addendum. The assessments seek to understand whether any undesirable wind conditions would be created on site or within the surrounding area as a result of the proposed development. It considers if the resultant wind speed changes would be suitable for the intended use of specific locations around and within the site in terms of comfort and safety. The following configurations have been tested:
- Configuration 1: Existing Site with Existing Surrounding Buildings (the Baseline Condition);
  - Configuration 2: The Project with Existing Surrounding Buildings;
  - Configuration 3: The Project with Cumulative Surrounding Buildings;
  - Configuration 4: The Project with Proposed Landscaping, Wind Mitigation Measures and Existing Surrounding Buildings; and
  - Configuration 5: The Project with Proposed Landscaping, Wind Mitigation Measures and

- Cumulative Surrounding Buildings.
335. Prevailing winds are from the south west throughout the year albeit with some north east winds mainly during spring. During construction works, wind conditions would be changeable due to the changing and evolving nature of the site and would gradually adjust to those of the completed development. Once completed, the majority of areas around the site would have wind conditions suitable for their intended use however the following areas would require mitigation to improve the conditions:
- On-Site thoroughfares with walking conditions during the windiest season and occurrence of strong winds (measurement locations 7 and 10);
  - On-Site thoroughfares with walking conditions during the windiest season (measurement locations 55 and 287);
  - Entrance to the courtyard of Plot 5A (measurement location 58) with walking conditions during the windiest season and occurrence of strong winds;
  - The mixed-use amenity space between Plot 4A and Plot 4D with strolling conditions (measurement location 284) during the summer season and occurrence of strong winds;
  - Seating provisions in the courtyard between Plot 4A and Plot 4D with standing conditions during the summer season (measurement locations 281 and 283); and
  - Entrance to Plot 4A on the western façade with strolling conditions (measurement location 21) during the windiest season when the cumulative schemes are in place.
336. Various methods of mitigation are proposed and would be secured as part of any consent issued. The measures include retaining existing landscaping and trees; inclusion of proposed landscaping and new trees/hedges as well as a pergola structure on the south west corner of Plot 4D; reducing the porosity of the fences at the entrance to the courtyard on 5B; inclusion of two multi stemmed trees in the north west seating area of plot 4A and 4D; relocation of some proposed seating.
337. With the appropriate mitigation in place, wind conditions on and surrounding the site would be appropriate for the intended use throughout the year. There would be no instances of safety concerns for more vulnerable users such as pedestrians or cyclists either in the context of the existing and cumulative buildings. The development is therefore considered to be acceptable in terms of impacts on wind and microclimate and would address the requirements of Policy P17 3 in terms of wind shear.

### Socio-economics and health

338. Socio-economics is assessed in Chapter 10 of the ES with updates within the ES addendum. The ES notes that there is a concentration of working age people living in Southwark. The development would generate construction industry jobs for local residents and also those outside the Borough and this would have a minor beneficial effect. Employment opportunities would also

exist within the commercial floor space of the completed and operational development however this would be a negligible effect given the size of the commercial floor space.

339. Population modelling demonstrates that there would be sufficient capacity in local schools to deal with the projected rise in children and the provision of onsite play space would be a minor beneficial effect of the scheme. In terms of health, the development would fund infrastructure improvements through the Community infrastructure Levy and as such the increase in population would have a negligible effect. The provision of new homes as well as the provision of new open space would moderate and minor beneficial effects respectively.

## **Energy and sustainability**

340. 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 requires all developments to be net zero carbon with a minimum onsite reduction of 35% for both commercial and residential. Non-residential development should achieve 15% reduction through energy efficiency measures. Where developments are unable to meet net zero carbon targets any shortfall between the minimum 35% and zero carbon must be mitigated by way of a payment towards the carbon offset fund. The energy strategy for new developments must follow the London Plan Hierarchy (be lean/ be clean/ be green/be seen) and this must be demonstrated through the submission of an Energy Strategy with applications and post construction monitoring for a period of 5 years.
341. 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 reflect the London Plan approach of 'lean, green and clean' principles and requires non-residential buildings to be zero carbon with an onsite reduction of at least 40%. Any shortfall can be addressed by way a contribution towards the carbon offset green fund. The energy hierarchy is as follows:
- Be lean – use less energy
  - Be clean – supply energy efficiently;
  - Be green – use renewable energy;
  - Be seen – monitor, verify and report on energy performance.

### **Be Lean (use less energy)**

342. In accordance with London Plan policy SI-2, the energy strategy prioritises the 'Be lean' category of the energy hierarchy, with heat demand reduced to such an extent that there would be no demand for heat from a centralised system within the site or from off-site networks. The passive energy efficiency measures include:
- Optimising building form, orientation, and site layout
  - Use of natural ventilation

- Maximising daylighting
- Use of high-performance glazing
- Optimising glazing ratio and use of solar shading
- Use of enhanced thermal insulation and improvements to U-Values
- Improvements to fabric air permeability
- Minimising thermal bridging.

343. The proposals also include active design measures to in order to further reduce energy demand beyond the abovementioned passive measures. These include:

- Use of mechanical ventilation with heat recovery (MVHR) system with summer bypass.
- Installation of low energy LED lighting with photocell/timer clock/presence detection controlling where possible.
- Use of smart meters for heat and electricity networks.
- Use of programmable thermostatic controls with individual zone control for heating and hot water.
- Provision of Building Management System (BMS) for central plant metering and controls.
- Use of variable speed pumps and fans for heating/cooling.
- Optimal distribution temperatures and use of enhanced thermal insulation for heating pipework to reduce distribution losses.

344. Measures under this category would result in a 18% reduction in carbon emissions for the residential elements and 6% for the commercial elements. However, overall, this would exceed the 15% requirement set out in the London Plan.

### Be Clean (supply energy efficiently)

345. The proposed development would not achieve any carbon savings under this category however the site would be future proofed for connection to a district CHP.

### Be Green (Use low or carbon zero energy)

346. The development would use photovoltaic panels (PV) and would provide a heating system of communal air source heat pumps (ASHP) to provide heat and hot water. The majority (typically greater than 70%) of the heat requirements in modern dwellings is for domestic hot water (DHW) which has a fairly consistent demand throughout the year. The ASHPs have been sized to deliver the whole of the development's DHW demand and approximately 90% of the development's space heating demand. Back-up boilers will be used to top up the remainder of the additional short peak heating demand whilst providing system resilience.

347. Measures for the residential elements under this category would result in a 47% reduction in carbon emissions. This would bring the total carbon reduction to 65% which is positive and well in excess of the policy requirement for on-site energy reduction. In relation to the commercial energy reductions, this category

would result in a 36% saving which would result in a 42% overall carbon saving for the commercial elements, which would also exceed the policy requirement.

### Be Seen (Monitor and review)

348. London Plan policy SI2 sets out an additional stage of the energy hierarchy, 'Be Seen'. This stage requires the calculation of the operational energy in detail design stage, monitoring, verification and reporting of energy performance throughout the construction and usage of the building for the first 5 years. The building's energy performance will be monitored post-construction through the installation of smart meters for heat and electricity networks which would enable occupants to monitor, manage and reduce their energy usage. In addition, a Building Management System (BMS) for the energy centre would be provided which will facilitate monitoring, managing and control of central plant. The provisions for Be Seen would be secured in the S106 Agreement.

### Conclusion on Energy Strategy

349. As noted above, the applicants have ensured that all carbon reductions have been maximised on site providing overall savings above Building Regulations of 65% and 42% for the residential and commercial elements, resulting in a large carbon saving above the required policy level. However, in order to ensure that the proposals would be fully carbon neutral, a financial contribution is required to securing off-site carbon off-setting measures. The overall offset for the detailed application site is calculated to be £494,371.

### Whole life carbon

350. Looking at Whole Life Carbon, Policy SI2 of the London Plan makes clear that development proposals referable to the mayor should calculate Whole Life-cycle Carbon (WLC) emissions through a nationally recognised Whole Life-cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions. Whole life-cycle carbon emissions are the total greenhouse gas emissions arising from a development over its lifetime, from the emissions associated with raw material extraction, the manufacture and transport of building materials, to installation/construction, operation, maintenance, and eventual material disposal.
351. The application is supported by a WLC assessment as required by Policy SI2; however additional clarifications were requested by the GLA on certain aspects of it. The submitted details outline which actions have been identified to help reduce the impact of the development in each of the life cycle stages which follows the GLA guidance, demonstrating suitable measures to reduce carbon from within the development over the lifetime of the buildings. Any further additional information required by the GLA will be resolved prior to the Stage II referral.
352. Furthermore, as requested by the GLA, a condition is secured requiring the applicant to submit a post construction assessment to report on the development's actual WLC emissions.

353. Objections have been received in relation to the impacts of demolition on embodied carbon, the applicant's submission details that the embodied carbon associated with pre-construction demolition has been calculated as 1857,550 kgCO<sub>2e</sub>, or 1858 tonnes of CO<sub>2e</sub>. This equates to 1.9% of the total WLC impact for Phase 2B. However, as the Whole Life Carbon assessment outlines, reports have been carried out to see if the existing buildings can be re-purposed, but these reports note that there are concerns over the degradation of the concrete and the fact that the buildings lack structural robustness man that the remedial works to overcome these issues would be appropriate. Furthermore, housing pressures within Southwark are significant and the densification of the application site through redevelopment and increase in housing is considered a positive of the overall proposals.

### Circular economy

354. Policy SI 7 Reducing Waste and Supporting the Circular Economy of the London Plan requires referable applications to promote circular economy outcomes and aim to be net zero-waste. It outlines that details should be provided as follows:

1. How all materials arising from demolition and remediation works will be re-used and/or recycled.
2. How the proposal's design and construction will reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life.
3. Opportunities for managing as much waste as possible on site.
4. Adequate and easily accessible storage space and collection systems to support recycling and re-use.
5. How much waste the proposal is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy.
6. How performance will be monitored and reported.

355. A Circular Economy statement has been provided which sets out in more detail the proposed measures to minimise resources use, minimise waste and strategies to manage waste effectively which ensures that the proposed development would accord with the circular economy principles.

356. A number of key commitments and design strategies were identified to ensure the development contribute towards a circular economy. These involve design decisions to minimise resources use, minimise waste and strategies to manage waste effectively. A plan for how these will be implemented was outlined.

### Overheating

357. 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.

358. Policy SI.4 of the London Plan provides further guidance and suggests that overheating should be addressed by following the cooling hierarchy which

includes minimising internal heat generation; reducing the amount of heat entering a building in summer through orientation, shading, albedo, fenestration, insulation, green roofs and walls; managing the heat within the building through exposed internal thermal mass and high ceilings; passive ventilation; and active cooling systems (assuming that they are the lowest carbon option).

359. The applicants have provided an overheating assessment which outlines that the design of the scheme has sought to incorporate measures from the cooling hierarchy, together with a mechanical ventilation system. Mitigation measures have been included high ceilings, appropriate glazing ratios, use of architectural detail elements such as recessed balconies and solar shading canopies, and mechanical and natural ventilation measures and a strategy to minimise internal heat gains. The submitted details are considered appropriate, with the GLA also confirming the acceptability of the overheating strategy for the development.

## BREEAM

360. Southwark Plan Policies P69 requires the development to achieve BREEAM 'excellent'. As such an appropriate condition should be imposed on any consent issued in order to secure this standard.

## Digital Connectivity

361. London Plan Policy SI6 introduces the need for new developments to address London's requirements for enhanced digital connectivity. The policy requires development proposals to ensure that sufficient ducting space for full fibre connectivity infrastructure is provided to all end users, to meet expected demand for mobile connectivity generated by the development, to take appropriate measures to avoid reducing mobile connectivity in surrounding areas, and to support the effective use of rooftops and the public realm (such as street furniture and bins) to accommodate well-designed and suitably located mobile digital infrastructure. This is repeated through policy P44 of the Southwark Plan 'Broadband and digital infrastructure'.
362. A consultation response has been received by Southwark's CCTV team which outlines that the existing buildings within the application site contain digital infrastructure which accommodates CCTV equipment for Southwark, and as such any demolition of the buildings would require relocation of the equipment to an alternative location. The response also notes that the new buildings could impact on the existing network of CCTV equipment and as such alterations to the locations of existing equipment may be required.
363. As such, the CCTV team have requested contributions towards the relocation and alterations to existing equipment in order to ensure that the CCTV connectivity would be retained. These have been agreed and will be included within the s106 agreement.
364. In order to ensure that the development would meet the requirements of providing improved digital connectivity, a condition is recommended to ensure

that the appropriate ducting for future connection to the full fibre infrastructure would be installed within the proposed development.

### Planning obligations (S.106 agreement)

365. Policy IP3 of the Southwark Plan and Policy DF1 of the London Plan advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. IP Policy 3 of the Southwark Plan is reinforced by the Section 106 Planning Obligations SPD 2015, which sets out in detail the type of development that qualifies for planning obligations. The NPPF emphasises 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

366. 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.

367.	Planning Obligation	Mitigation	Applicant Position
	Affordable Housing	50.4% by habitable room, to be completed and made available before more than 50% of the private units can be occupied.	Agreed.
	Affordable housing monitoring fee	Contribution of £39,300	Agreed
	Affordable Housing monitoring clauses	As set out earlier in this report.	Agreed.
	Affordable housing review mechanism	Early and late-stage review mechanisms.	Agreed.
	Employment during construction	133 sustained jobs for unemployed borough residents, 133 short courses and 33 construction industry apprenticeships, or a payment of £641,350 for shortfall, and the associated employment, skills and business support plan.	Agreed
	Local Procurement	Required during construction.	Agreed
	Carbon offset fund	£494,371	Agreed

Street tree bond	£6,000 per tree in the event that the proposed street trees cannot be planted or die and new trees need to be planted.	Agreed
Highway works	<p>Highways infrastructure works committed under the OPP should be apportioned to this development.</p> <p>Additionally, the scheme should secure the following S.278 works:</p> <ul style="list-style-type: none"> <li>- Adoption of Mina Road and Haywood Street link road extensions as highway as well as the pedestrian/cycle route improvements on Albany Road, Bagshot Street, Kinglake Street and Thurlow Street.</li> <li>- This should include the reconstruction of the related footways, conversion of the two sets of humps on the adjacent segment of Thurlow Street to raised tables, construction of a raised entry treatment plus at Kinglake Street/Thurlow Street junction, creation of a raised zebra crossing on Albany Road arm (western) of Albany Road/Thurlow Street junction plus the removal of guard rails at this intersection and construction of a vehicle crossover on Bagshot Street.</li> </ul>	Agreed
Delivery service plan bond	£42,035	Agreed
TfL bus contribution	340,454	Agreed
TfL cycle hire Provision contribution	Provision of a new docking station within the site for 30 cycles.	Agreed

TfL cycle hire membership	Two years free cycle hire membership per household for the residential units.	Agreed
Car club membership	3 years membership for each eligible resident within the development including the commercial occupiers.	Agreed
Parking permit exemption	Future residents and businesses would be prevented from obtaining parking permits for the surrounding streets. Returning residents would be able to apply.	Agreed
CCTV contribution	Contribution towards relocation of the CCTV equipment on Wendover for £88,000	Agreed
Tree planting	£21,000	Agreed
Future-proofing for district heating network	To enable the development to connect to future district heating networks if deemed feasible	Agreed
Post-installation review of energy measures installed	Review to verify the carbon savings delivered with an adjustment to the carbon off-set green fund contribution if required.	Agreed
Total financial contributions	£1,031,160 (£1,672,510 should construction jobs not be provided).	Agreed
Administration and monitoring fee (excluding affordable housing monitoring fee and servicing bond)	£27,617.48 (estimated)	Agreed

368. The S106 Agreement should also secure an OPP re-conciliation strategy, a demolition and construction environmental management plan, a service management plan, car parking management plan, updated energy strategy and a travel plan.

369. In the event that an agreement has not been completed by 30 September 2025, the committee is asked to authorise the director of planning and growth to refuse permission, if appropriate, for the following reason:

In the absence of a signed S106 legal agreement there is no mechanism in place to mitigation against the adverse impacts of the development through contributions and it would therefore be contrary to IP Policy 3 Community infrastructure levy (CIL) and Section 106 planning obligations of the Southwark Plan 2022; and Policy DF1 Delivery of the Plan and Planning Obligations of the London Plan 2021; and the Southwark Section 106 Planning Obligations and Community Infrastructure Levy SPD 2015.

### **Mayoral and borough community infrastructure levy (CIL)**

370. 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. In this instance, based on information provided by the applicant, an estimated Mayoral CIL payment of £1,661,260.85 and a Southwark CIL payment of £1,727,944.99 would be due. This figure is an estimate only and would be calculated in more detail when CIL Additional Information and Assumption of Liability forms are submitted prior to implementation.

### **Community involvement and engagement**

371. A Statement of Community Involvement (SCI) and engagement summary template have been submitted with the application, detailing the pre-application consultation undertaken with key stakeholders and the local community prior to the submission of the planning application.
372. The SCI advises that the approach to consultation and engagement took the form of a three-stage process. Stage 1 focussed on introducing the project, Stage 2 concentrated on concept plans whilst Stage 3 centred on the revised/final draft of the plans. It outlines how it followed the guidelines for consultation as set out within the Mayor's Good Guide to Estate Regeneration (2018).
373. Stage 1 took place between June and August 2021 with a series of online youth workshops, online stakeholder 1-2-1 meetings and street-based pop-ups. This stage was an opportunity to revisit what had been determined during the earlier consultations as well as to discuss some high-level ideas and concepts for the site. This stage also considered policy changes that have influenced the plans for Phase 2B since 2016.
374. Stage 2 included two in person consultation events in the form of public exhibitions, youth club and school workshops, public online discussion and several 1-2-1 stakeholder meetings. This was an opportunity to share concept plans and collect feedback.
375. Stage 3 was an opportunity to present revised plans following the feedback

from Stage 2. These revised plans were presented with the changes highlighted with further comments and feedback being collected prior to final revisions and plan production. Stage Three included a dedicated session for the Latin American community, online themed workshops and a public Q&A; an outdoor public exhibition (four weeks); printed information in local libraries; a street pop-up; and group walkabouts.

376. Following the revisions to the scheme, an updated Statement of Community Involvement addendum has been submitted which sets out the further consultation undertaken by the applicants which included two further drop-in consultation events in June 2024 to discuss the amendments to the proposed scheme, in addition to meetings with various stakeholders, including the Tenants Residents Association (TRA), Ward Councillors, LBS officers and the GLA.
377. The SCI addendum sets out the comments received by consultees and outlines how it has sought to respond to comments received and addressed these within the planning application.
378. As part of its statutory requirements the Local Planning Authority sent letters to surrounding residents, displayed site notices in the vicinity, and issued a press notice publicising the planning application. Adequate efforts have, therefore, been made to ensure the community has been given the opportunity to participate in the planning process. Details of consultation and any re-consultation undertaken by the Local Planning Authority in respect of this application are set out in the appendices.

## **Consultation responses from external and statutory consultees**

### The Environment Agency

379. No objections subject to appropriate conditions. Following re-consultation a second response was received confirming that they had no further comments beyond those previously made.

**Response** – Noted and agreed, the relevant conditions would be attached to any consent issued and continue to be relevant to the revised scheme.

### Greater London Authority

380. **Land Use** - The principle of estate regeneration to deliver uplifts in affordable Housing and community facilities is strongly supported. The scheme proposed would provide a net gain of additional social rented floorspace above the extant consent.

**Housing** - The re-provision of affordable units and uplift of new homes is strongly supported. The applicant is proposing 50% affordable housing (by habitable room) across the site. Following conclusion of the viability review process early and late-stage reviews should be secured along with all relevant affordability criteria.

**Urban design** - The design of the scheme is broadly supported, the council should secure details of key facing materials.

**Transport** - The council must appropriately secure the delivery of a Cycle Hire docking station, the quantum and design of the proposed cycle stores, vehicle parking and management plan, delivery and servicing plan, construction logistic plan and a travel plan.

**Sustainable development** - Further information and clarification is required on the sustainable development strategies before compliance with the London Plan can be confirmed.

**Response** – The GLA comments on the affordable housing assessment are noted. The relevant design and transport conditions would be secured on any consent issued and the applicant has provided clarification to the GLA on the sustainability information requested. Further discussions have been held with the GLA following the submission of the revised proposals, however no formal comments have been received from GLA offers.

## Health and Safety Executive

381. Following revisions to the scheme, the HSE have provided a revised response which outlined that they were satisfied with the proposed design of the buildings in relation to fire safety, including the provision of two escape stairs per core. They did note that some further detail would be required as the detailed design develops, however for planning purposes, the proposal is acceptable.

### **Officer comments:**

The above comments are noted, further detailed design for fire safety purposes will develop through the building control process should planning permission be granted.

## Heathrow Airport

382. No safeguarding objections. Informatives advised regarding cranes.  
**Response** – Noted and agreed, the relevant informatives would be added to any consent issued.

### Historic England

383. Historic England do not wish to offer any advice/comments on the proposal.  
**Response** – Noted.

### London Fire Brigade

384. No further observations to make.  
**Response** – Noted.

### London Underground

385. No objection.

**Response** – Noted.

Metropolitan Police

386. The development could achieve Secure by Design and the relevant conditions should be secured on any consent issued.

**Response** – Noted and agreed, the relevant conditions (SBD measures and SBD Certification) would be imposed on any consent issued.

NATS

387. No safeguarding objections.

**Response** – Noted.

Thames Water

388. No objection subject to conditions.

**Response** – Noted, the relevant condition would be attached to any consent issued.

Transport for London (TfL)

389. **Public Transport** - The legal agreement for the outline planning permission provides funding for 2 new Cycle Hire docking stations and additional bus service capacity. The Phase 2b development will provide one of the new Cycle Hire docking stations (30 cycles) at the southern boundary of block 5a to the east of Thurlow Square. The development proposal has a higher number of homes on this plot than predicted in the outline planning permission, however the additional bus trips are unlikely to have a significant additional impact on capacity, given that the legal agreement of the outline planning permission secures a substantial contribution towards local bus capacity increases.

390. **Public Transport** -The legal agreement for the outline planning permission provides funding for 2 new Cycle Hire docking stations and additional bus service capacity. The Phase 2b development will provide one of the new Cycle Hire docking stations (30 cycles) at the southern boundary of block 5a to the east of Thurlow Square. The development proposal has a higher number of homes on this plot than predicted in the outline planning permission, however the additional bus trips are unlikely to have a significant additional impact on capacity, given that the legal agreement of the outline planning permission secures a substantial contribution towards local bus capacity increases.

391. **Car Parking** - The applicant is proposing 79 car parking spaces for existing and Blue Badge holder residents. Approximately half of these spaces would be on street with the remainder at podium/basement level. This provision includes 6 car club spaces and 21 Blue Badge spaces. The proposals would fall within the parameter set by the existing outline permission which approved a ratio of 1 space per 0.13 units. It is noted that the current London Plan requires residential development in inner London to be 'car free', bar Blue Badge provision. As such, the council should secure that no new non-Blue Badge

holding residents should be allowed a car parking space (and are restricted from applying for on-street parking permits) and that as existing car-owning residents move out, the spaces are repurposed/reallocated with the aim of removing the on-street non-Blue Badge/car club spaces first.

392. The council should secure 20% of any car parking spaces should have active electric vehicle charging, with the rest passive provision. The Blue Badge provision is proposed at 3% of residential units, with a further 7% provision identified should need arise by converting non-Blue Badge bays the future podium and basement car parks, as set out in the draft Parking Management Plan (PMP). This is in line with London Plan standards, however in this instance, 3% provision from the outset only would be acceptable, commensurate with low car ownership and low Blue Badge uptake in inner London.
393. **Cycle parking** - The proposed cycle parking quantum accords with the requirements of London Plan Policy T5. The cycle stores provided must be delivered in accordance with LCDS guidance. The quantum and design of the

Response – Noted and agreed, the details above would be secured either as conditional requirements on the consent or as obligations within the s106 agreement.

394. Following re-consultation, TfL officers confirmed that there are four more car parking spaces proposed but the overall ratio drops to 0.13. This is acceptable, as long as entirely new, non-BB holding residents are precluded from accessing the spaces and that the on-street spaces will be part of the M1 zone CPZ and therefore issue of the permits for these can be controlled by the council, and restricted to returning residents/BB holders. They also confirmed that the proposed Bus contribution is in accordance with the OPP and is acceptable.

Response – These comments are noted with the contributions and conditions secured as part of the recommendation.

## **Consultation responses from internal consultees Highways**

### Highways

395. No objections subject to the entering into a S278 agreement to secure highway improvements and a condition to require the submission of further details in relation to a highway's infrastructure plan.

Response – noted, the s278 will be secured within the s106 agreement and a condition is also secured for further highways details.

### CCTV team

396. Comments have been received requesting a financial contribution towards the relocating of existing CCTV equipment which is located on the roof of Wendover and a contribution towards additional CCTV equipment.

Response – The comments are noted, and a financial contribution is secured towards the relocation of the CCTV equipment and the requirement to submit a CCTV strategy will be secured via the s106 agreement.

### Environmental Protection Team

397. Raised no objections subject to conditions in relation to construction management, noise, air quality and contamination.

Response – Noted and agreed, the details above would be secured by conditional requirements on the consent.

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

398. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights.
399. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.
400. 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.
401. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.

402. The applicants have provided an Equalities Impact Assessment within the submission, which outlines that the redevelopment of the Aylesbury Estate would provide new and improved housing, including affordable housing that would benefit BAME communities as well as providing the opportunity for residents to remain on the estate, whilst also re-providing homes for existing tenants through offering the right to return. The improved street layout and connectivity/legibility would provide better links between the core of the estate and nearby shopping areas on Walworth Road and Old Kent Road that will benefit small BAME business in these areas.
403. The development would also include 10% wheelchair housing which would be beneficial to residents with disabilities and would provide new housing options. All buildings would also provide level access with new lifts for all future residents and visitors which would provide significant benefits, whilst also providing new blue badge parking spaces providing increased access for wheelchair users. Contributions would also be secured to provide improved bus services, further improving access into and around the site.
404. New playspace would also be provided, providing much improved opportunities for younger people, whilst also providing new spaces, such as Bagshot Park and Thurlow Square which would provide increased opportunities for social interaction for all residents and visitors with protected characteristics.
405. The new public spaces would also provide much increased legibility and improved safety with new lighting creating an attractive and safe environment for all residents and visitors with protected characteristics.
406. Whilst there would be some temporary impacts on people with protected characteristics on a short-term basis as a result of the construction works, the proposals would offer significant long-term benefit benefits for people with protected characteristics. Through the delivery of new housing, open space and improved public realm and significant increases to accessibility within the site.

### **Human rights implications**

407. This planning application engages certain human rights under the Human Rights Act 1998 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.
408. This application has the legitimate aim of providing new homes. 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**

409. 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.

410. 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.

411. **Positive and proactive engagement: summary table**

Was the pre-application service used for this application?	YES
If the pre-application service was used for this application, was the advice given followed?	YES
Was the application validated promptly?	YES
If necessary/appropriate, did the case officer seek amendments to the scheme to improve its prospects of achieving approval?	YES
To help secure a timely decision, did the case officer submit their recommendation in advance of the agreed Planning Performance Agreement date?	YES

## CONCLUSION

412. In land use terms the proposed development would accord with the requirements of site allocation NSP01 of the Southwark Plan by providing a significant number of new homes, with a policy compliant level of affordable housing in excess of 50% by habitable room. Whilst there would be a very small variation on the tenure split of the affordable and some variation on the sizes of homes proposed this is considered to be acceptable given that the majority of the affordable homes and the majority of larger family sized homes would be social rented meeting local needs. The development would also provide some ancillary retail/employment /leisure space which is also considered to be in line with the site allocation. In land use terms the development would comply with the relevant policies in the London Plan and Southwark Plan.
413. The development would bring forward the benefits established under the OPP with regards to high quality homes, new public open spaces, improved legibility and connectivity and new affordable homes. The scheme would result in a significant uplift in social rented floorspace compared to the OPP.
414. The new homes would be modern, sustainable and would meet or exceed the minimum space standards as well as offering a high level of dual aspect. Wheelchair housing at 10% would comply with policy requirements. The homes would also meet current fire safety requirements, addressing a significant regulatory change that has been introduced post the grant of the OPP.

415. In terms of neighbouring amenity, the proposed development would have no significant adverse impacts on any neighbouring existing residential neighbours in terms of a loss of outlook, loss of privacy or a detrimental reduction in the availability of daylight or sunlight. Additionally, the scheme would not have any significant detrimental adverse impact on future phases of the OPP in terms of daylight and sunlight.
416. Whilst the tallest building on the site is taller than that indicated in the site allocation and approved within the OPP, it has been assessed against Southwark Plan tall building policy and the proposed development demonstrates high quality design with robust and appropriately contextual materials and finishes. This is welcomed as urban design and high architectural quality are priorities for the council in terms of building well designed neighbourhoods. The scale, massing and appearance of the building are significant however they would not have any detrimental impact on the character or setting of any listed buildings and these have been fully considered as part of the submitted BHTVIA.
417. The development would provide an improved public realm as well as new, high quality public spaces including a new park with MUGA and a new square facing onto Thurlow Street. Full on site and supervised play provision would be provided for all age groups which is welcomed. In sustainability terms, the development would achieve a 65% carbon reduction, well in excess of the policy requirement and BREEAM excellent would be conditioned for the commercial spaces. As such, the development would be sustainable and would make efficient use of a brownfield site.
418. Developments of this size and nature have the potential for significant environmental impacts and therefore an addendum to the extant scheme Environmental Statement has been submitted. The impacts identified in the Environmental Statement have been assessed and taken into account and should be considered in determining the application. No impacts of a significant scale have been identified which are not capable of being mitigated.
419. Subject to conditions and a number of planning obligations the transport impacts of the proposal are considered to be acceptable. Impacts relating to air quality, flood risk, contaminated land have all been considered and are found to be acceptable, subject to a number of conditions.
420. The application is considered to be in compliance with the development plan, when read as a whole, and it is therefore recommended that planning permission be granted, subject to conditions, the timely completion of a S106 Agreement and referral to the Mayor of London.

## BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
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.gov.uk Case officer telephone: 020 7525 0254 Council website: www.southwark.gov.uk

## APPENDICES

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

## AUDIT TRAIL

<b>Lead Officer</b>	Stephen Platts, Director of Planning and Growth	
<b>Report Author</b>	Alex Cameron, Team Leader	
<b>Version</b>	Final	
<b>Dated</b>	14 April 2025	
<b>Key Decision</b>	No	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>		
<b>Officer Title</b>	<b>Comments Sought</b>	<b>Comments included</b>
Strategic Director, Resources	No	No
Strategic Director, Environment, Sustainability and Leisure	No	No
Strategic Director, Housing	No	No
<b>Date final report sent to Constitutional Team</b>		20 May 2025

## 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.

---

<b>Applicant</b>	Notting Hill Genesis	<b>Reg. Number</b>	22/AP/2226
<b>Application Type</b>	Major application		
<b>Recommendation</b>	GRANT subject to Legal Agreement (GLA)	<b>Case Number</b>	H1059

## Draft of Decision Notice

### Grant subject to Legal Agreement & Referral to GLA for the following development:

Demolition of the existing buildings and redevelopment to provide a mixed use development comprising five buildings ranging in height from 5 to 26 storeys with basements, providing a total of 640 new homes (Class C3); flexible floorspace for commercial business and service uses (Class E) and local community and learning uses (Class F1/F2(a)(b) public open space and playspace private and communal amenity space formation of new accesses and routes within the site alterations to existing accesses; and associated car and cycle parking; refuse storage and hard and soft landscaping; and associated works.

For Information, this is an AMENDED SCHEME, the amendments include the following:

- Increase of 26 units, bringing the overall total to 640 homes;
- Additional one-storey to 4 buildings to accommodate for the additional residential units (the height range of will remain within the 5-26 storey range); and
- Changes to the internal layout, including the removal of one building core and the incorporation of two stairs to 4 building cores, to ensure compliance with fire safety regulations.

Additional and amended documents have been provided to support the above amendments.

The application is accompanied by an Environmental Statement and associated addendum

submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The Environmental Statement and addendum can be viewed online at the planning register. Hard copies of the complete ES can be purchased from HGH for a fee or an electronic version can be sent free of charge in PDF format, upon request.

Aylesbury Estate Site Phase 2B Land Bounded By Thurlow Street And Albany Road And Kinglake Street And Bagshot Street London Southwark SE17 And SE5

**In accordance with application received on 12 July 2022 and Applicant's Drawing Nos.:**

Existing Plans

Proposed Plans

Other Documents

received

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

- 1 Prior to works commencing, including any demolition, an Arboricultural Method Statement shall be submitted to and approved in writing by the Local Planning Authority.
  - a) A pre-commencement meeting shall be arranged, the details of which shall be notified to the Local Planning Authority for agreement in writing prior to the meeting and prior to works commencing on site, including any demolition, changes to ground levels, pruning or tree removal.
  - b) A detailed Arboricultural Method Statement showing the means by which any retained trees on or directly adjacent to the site are to be protected from damage by demolition works, excavation, vehicles, stored or stacked building

supplies, waste or other materials, and building plant, scaffolding or other equipment, shall then be submitted to and approved in writing by the Local Planning Authority. The method statements shall include details of facilitative pruning specifications and a supervision schedule overseen by an accredited arboricultural consultant.

c) Cross sections shall be provided to show surface and other changes to levels, special engineering or construction details and any proposed activity within root protection areas required in order to facilitate demolition, construction and excavation.

The existing trees on or adjoining the site which are to be retained shall be protected and both the site and trees managed in accordance with the recommendations contained in the method statement. Following the pre-commencement meeting all tree protection measures shall be installed, carried out and retained throughout the period of the works, unless otherwise agreed in writing by the Local Planning Authority. In any case, all works must adhere to BS5837: (2012) Trees in relation to demolition, design and construction and BS3998: (2010) Tree work - recommendations.

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

Reason: To avoid damage to the existing trees which represent an important visual amenity in the area, in accordance with The National Planning Policy Framework 2021 Parts 8, 11, 12, 15 and 16; Policies G1 (Green Infrastructure, G5 (Urban Greening) and G7 (Trees and Woodlands) of the London Plan 2021; and policies of The Southwark Plan 2022: P56 Protection of amenity; P57: Open space; P58: Open water space; P59: Green infrastructure, P66 Reducing noise pollution and enhancing soundscapes, P13: Design of places; P14: Design quality; P15: Residential design, P20: Conservation areas; P21: Conservation of the historic environment and natural heritage and P60 Biodiversity.

2. Prior to the commencement of development (with the exception of demolition) , details of surface water management measures in accordance with the approved Flood Risk Assessment Reference; shall be submitted to and approved in writing by the Local Planning Authority, and the scheme shall

thereafter be carried out in accordance with the approved details.

Reason To prevent the increased risk of flooding and to improve water quality in accordance with Chapter 14 (Meeting the challenge of climate change, flooding and coastal change) of the National Planning Policy Framework (2024); Policy SI 12 (Flood risk management) of the London Plan (2021); P67 Reducing water use; P68 Reducing flood risk and P64 Contaminated land and hazardous substances

3. Prior to the commencement of development (with the exception of demolition);

Part One - A site investigation and risk assessment shall be completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site.

i) The Phase 1 (desk study, site categorisation; sampling strategy etc.) shall be submitted to the Local Planning Authority for approval before the commencement of any intrusive investigations.

ii) Any subsequent Phase 2 (site investigation and risk assessment) shall be conducted in accordance with any approved scheme and submitted to the Local Planning Authority for approval prior to the commencement of any remediation that might be required.

Part Two - In the event that contamination is present, a detailed remediation strategy to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment shall be prepared and submitted to the Local Planning Authority for approval in writing. The scheme shall ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after

remediation. The approved remediation scheme (if one is required) shall be carried out in accordance with its terms prior to the commencement of development, other than works required to carry out remediation, unless otherwise agreed in writing by the Local Planning Authority. The Local Planning Authority shall be given two weeks written notification of commencement of the remediation scheme works.

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

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

#### Reason

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

4. No development shall take place, including any works of demolition, until a Construction Method Statement has been submitted to and approved in writing by the Local Planning Authority. The approved statement shall be adhered to throughout the construction period. The Statement shall provide for:

the parking of vehicles of site operatives and visitors;

loading and unloading of plant and materials;

storage of plant and materials used in constructing the development;

the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate;

wheel washing facilities;

measures to control the emission of dust and dirt during construction;

a scheme for recycling / disposing of waste resulting from demolition and construction works

Reason:

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of pollution and nuisance, in accordance with the National Planning Policy Framework (2024); and Policy P56 (Protection of amenity) of the Southwark Plan (2022).

5. Thames Water

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

Reason

The proposed works will be in close proximity to underground sewerage and water utility infrastructure. Piling has the potential to impact on local underground sewerage utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method

statement.

6. Thames Water

Development (excluding demolition) should not be commenced until Impact studies of the existing water supply infrastructure have been submitted to, and approved in writing by, the local planning authority (in consultation with Thames Water). The studies should determine the magnitude of any new additional capacity required in the system and a suitable connection point.

Reason: To ensure that the water supply infrastructure has sufficient capacity to cope with the/this additional demand.

7. Highways

An updated Highways Infrastructure Plan shall be submitted to and agreed in writing by the Local Planning Authority prior to the commencement of

development (excluding demolition) in consultation with the Highways Authority in order to finalise details of street design and treatment, lighting, planting access and visibility. The development shall then be implemented in accordance with any consent given.

Reason

In the interest of amenity and to secure a high standard of street design.

8. Thames Water

Prior to commencement of any construction works, excluding demolition, a drainage strategy for that block, detailing any on and/or off site drainage works should be submitted to and approved in writing by the local planning authority in consultation with the sewerage undertaker. No discharge of foul or surface water from the site shall be accepted into the public system until the drainage works referred to in the strategy have been completed.

Reason

The development may lead to sewage flooding; to ensure that sufficient capacity is made available to cope with the new development; and in order to avoid adverse environmental impact upon the community.

**Permission is subject to the following Grade Condition(s)**

9. 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 (including cross sections, .

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) and Policy P60 (Biodiversity) of the Southwark Plan (2022).

10. Prior to works commencing above grade, full details of all proposed planting of

130 trees at grade (other than on podiums, roofs or terraces) shall be submitted to and approved in writing by the Local Planning Authority. This will include tree pit cross sections, planting and maintenance specifications, use of guards or other protective measures and confirmation of location, species, sizes, nursery stock type, supplier and defect period. All tree planting shall be carried out in accordance with those details and at those times. All trees and shrubs will conform to the specification for nursery stock as set out in British Standard 3936 Parts 1 (1992) and 4 (1984). Advanced Nursery stock trees shall conform to BS 5236 and BS: 4428 Code of practice for general landscaping operations. If within a period of five years from the date of the planting of any tree that tree, or any tree planted in replacement for it, is removed, uprooted or destroyed or dies, or becomes, in the opinion of the local planning authority, seriously damaged or defective, another tree of the same species and size as that originally planted shall be planted at the same place in the first suitable planting season., unless the local planning authority gives its written consent to any variation.

Reason:

To ensure the proposed development will preserve and enhance the visual amenities of the locality and is designed for the maximum benefit of local biodiversity, in addition to the attenuation of surface water runoff in accordance with The National Planning Policy Framework 2024 Parts 8, 11, 12, 15 and 16; 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 of the Southwark Plan (2022) P60 Biodiversity, P13 Design of places, P14 Design quality, P56 Protection of amenity

11. Part 1: Before any above grade work hereby authorised begins, details of the biodiversity (green/brown) roof(s) shall be submitted to and approved in writing by the Local Planning Authority. The biodiversity (green/brown) roof(s) shall be:
- biodiversity based with extensive substrate base (depth 80-150mm);
  - laid out in accordance with agreed plans; and
  - planted/seeded with an agreed mix of species within the first planting season following the practical completion of the building works (focused on wildflower planting, and no more than a maximum of 25% sedum coverage).

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

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

Part 2: Full Discharge of this condition will be granted once the green/brown roof(s) are completed in full in accordance to the agreed plans. A post completion assessment will be required to confirm the roof has been constructed to the agreed specification.

Reason:

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

12. Details of 24 Swift nesting boxes / bricks shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of the use hereby granted permission. The details shall include the exact location, specification and design of the habitats.

The boxes / bricks shall be installed with the development prior to the first occupation of the building to which they form part or the first use of the space in which they are contained. The Swift nesting boxes / bricks shall be installed strictly in accordance with the details so approved, shall be maintained as such thereafter. Discharge of this condition will be granted on receiving the details of the nest/roost features and mapped locations and Southwark Council agreeing the submitted plans, and once the nest/roost features are installed in full in accordance to the agreed plans. A post completion assessment will be required to confirm the nest/roost features have been installed to the agreed specification.

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with Chapter 15 (Conserving and enhancing the natural environment) of the National Planning Policy Framework (2024); Policy G6 (Biodiversity and access to nature) of the London Plan (2021); P56 Protection of amenity, P57 Open space, P58 Open water space, P59 Green infrastructure, P60 Biodiversity, P66 Reducing noise pollution and enhancing soundscapes and P69 Sustainable standards of the Southwark Plan (2022).

13. Details of 18 bird or bat nesting boxes / bricks shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of the use hereby granted permission. The details shall include the exact location, specification and design of the habitats. The boxes / bricks shall be installed with the development prior to the first occupation of the building to which they form part or the first use of the space in which they are contained. The nesting boxes / bricks shall be installed strictly in accordance with the details so approved, shall be maintained as such thereafter. Discharge of this condition will be granted on receiving the details of the nest/roost features and mapped locations and Southwark Council agreeing the submitted plans, and once the nest/roost features are installed in full in accordance to the agreed plans. A post completion assessment will be required to confirm the nest/roost features have been installed to the agreed specification.

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with Chapter 15 (Conserving and enhancing the natural environment) of the National Planning Policy Framework (2024); Policy G6 (Biodiversity and access to nature) of the London Plan (2021); P56 Protection of amenity, P57 Open space, P58 Open Water space, P59 Green infrastructure, P60 Bioiversity, P66 Reducing noise pollution and enhancing soundscapes and P69 Sustainable standards of the Southwark Plan (2022).

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

Reason:

This condition is necessary to ensure the protection of wildlife and supporting habitat and secure opportunities for the enhancement of the nature conservation value of the site. The conditions requirements are in accordance with Policy P59 Green infrastructure, P60 Biodiversity and P61 Trees of the Southwark Plan 2022 and Policy G6 (Biodiversity and access to nature) of the London Plan (2021).

15. Before any work in connection with landscaping is carried out above grade, details of the positioning of car club bays shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise than in accordance with any such approval given. The car club bays shall remain for as long as the development is occupied.

Reason:

To ensure the safety of motorists, cyclists and pedestrians in accordance with Chapters 8 (Promoting healthy and safe communities) and 9 (Promoting sustainable transport) of the National Planning Policy Framework (2024); Policy P50 (Highways Impacts) of the Southwark Plan (2022).

16. Details of Bee bricks and 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 12 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 Southwark Council 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 Chapter 15 (Conserving and enhancing the natural environment) of the National Planning Policy Framework (2021); Policy G6 (Biodiversity and access to nature) of the London Plan (2021); P56 Protection of amenity, P57 Open space, P58 Open Water space, P59 Green infrastructure, P60 Bioiversity, P66 Reducing noise pollution and enhancing soundscapes and P69 Sustainable standards of the Southwark Plan (2022).

17. Before any above grade work hereby authorised begins, details (1:50 scale

drawings) of the facilities to be provided for the secure and covered storage of cycles shall be submitted to and approved in writing by the Local Planning Authority. Thereafter the cycle parking facilities provided shall be retained and the space used for no other purpose, and the development shall not be carried out otherwise in accordance with any such approval given.

Reason: In order to ensure that satisfactory safe and secure cycle parking facilities are provided and retained in order to encourage the use of cycling as an alternative means of transport to the development and to reduce reliance on the use of the private car in accordance with Chapter 9 (Promoting sustainable transport) of the National Planning Policy Framework (2024); Policy T5 (Cycling) of the London Plan (2021); Policy P53 (Cycling) of the Southwark Plan (2022).

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

Reason:

In pursuance of the Local Planning Authority's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions and to improve community safety and crime prevention, in accordance with Chapter 8 (Promoting healthy and safe communities) of the National Planning Policy Framework (2024); Policy D11 (Safety, security and resilience to emergency) of the London Plan (2021); Policy P13 (Design of Places), Policy P14 (Design Quality) and Policy P16 (Designing out Crime) of the Southwark Plan (2022).

19. Prior to above grade works commencing, material samples/sample-panels/sample-boards of all external facing materials to be used in the carrying out of this permission shall be [presented on site/submitted to] and approved in writing by the Local Planning Authority; the development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

In order to ensure that these samples will make an acceptable contextual response in terms of materials to be used, and achieve a quality of design and detailing in accordance with Chapter 12 (Achieving well-designed places) of the National Planning Policy Framework (2024); 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).

20. Unless previously discharged, before any fit out works to the Class E space hereby authorised begins, an independently verified BREEAM report (detailing performance in each category, overall score, BREEAM rating and a BREEAM certificate of building performance) to achieve a minimum 'Very Good' shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise than in accordance with any such approval given;

Before the space is brought into use, a certified Post Construction Review (or other verification process agreed with the local planning authority) shall be submitted to and approved in writing by the Local Planning Authority, confirming that the agreed standards at (a) have been met.

#### Reason

To ensure the proposal complies with Chapter 14 (Meeting the challenge of climate change, flooding and coastal change) of the National Planning Policy Framework (2024); Policy SI 2 (Minimising greenhouse gas emissions) of the London Plan (2021) and policy P69 'Sustainability standards' of the Southwark Plan 2022.

21. Full fibre connectivity

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

#### Reason:

To provide high quality digital connectivity infrastructure to contribute to London's global competitiveness in accordance with Policy SI6 of the London Plan (2021)

## 22. CEMP

No above grade works shall take place until a CEMP for that block has been submitted to and approved in writing by the Local Planning Authority. The CEMP shall oblige the applicant, or developer and their contractor/s to commit to current best practice with regard to site management and use all best endeavours to minimise disturbances including, but not limited to, noise, vibration, dust, smoke and plant emissions emanating from the site during construction. The CEMP will include the following:

- A detailed specification of construction works including consideration of environmental impacts (noise, dust, emissions to air, lighting, waste) and the proposed remedial measures;
- The specification shall include details of foundation piling
- Engineering measures to eliminate or mitigate specific environmental impacts
- Arrangements for direct and responsive contact for the public with the contractor/site management during demolition and/or construction and arrangements for regular public access information meetings to discuss the progress of and issues with the development;
- A commitment to adopt and implement the ICE Demolition Protocol, Southwark's Considerate Contractor Scheme and GLA Best Practice Guidance;
- To follow all current best construction practice with regard to the management of outputs regarding noise and emission to air;
- Safe routing, holding and access for site traffic;
- Waste storage, separation and disposal;
- A Construction and Logistics Plan in line with TfL guidance (all construction access routes and access details also need to be approved by TfL);
- Details of cycle awareness training for all drivers and installation of skirts on all lorries.

All construction work shall then be undertaken in strict accordance with the approved CEMP, unless otherwise agreed in advance, in writing by the Local Planning Authority.

## Reason

To ensure that occupiers of neighbouring premises and the wider environment do not suffer a loss of amenity by reason of pollution and nuisance, in

accordance with Policy P56 'Protection of amenity' of the Southwark Plan (2022), and the National Planning Policy Framework (2024).

23. Prior to any above grade work hereby authorised begins, a site report detailing the proposed methods relevant to that block to minimise future occupiers exposure to air pollution shall be submitted to and approved in writing by the local planning authority and the development shall not be carried out otherwise than in accordance with any such approval given and the approved scheme shall be implemented prior to occupation of the development and shall be permanently maintained thereafter.

#### Reason

To ensure that air quality does not suffer by reason of pollution and works associated with the construction and operation of the development, in accordance with Policy P56 'Protection of amenity' of the Southwark Plan (2022), and the National Planning Policy Framework (2024).

24. Mock ups

Prior to any above grade works taking place, a mock up of all external finishes including cladding, brickwork and masonry which includes a corner junctions with door and window reveals, cills, lintels and all ground level door types for the relevant block shall be constructed for inspection on site and approved in writing by the Local Planning Authority; the development shall not be carried out otherwise than in accordance with any such approval given.

#### Reason:

In order to ensure and achieve a quality of design and detailing in accordance with Chapter 12 (Achieving well-designed places) of the National Planning Policy Framework (2024); 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).

25. Detailed drawings

Prior to any above grade works. Section detail-drawings at a scale of 1:5 or 1:10 through:

- principal features on the facades;
- parapets (which shall be in brick or masonry);

- roof edges;
- junctions with the existing building; and
- heads, sills and jambs of all openings.

Shall be submitted to and approved in writing by the Local Planning Authority; the development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

In order to ensure and achieve a quality of design and detailing in accordance with Chapter 12 (Achieving well-designed places) of the National Planning Policy Framework (2024); 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)**

26. 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, 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.

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.

Reason:

To ensure the proposed development will preserve and enhance the visual amenities of the locality and is designed for the maximum benefit of local biodiversity, in addition to the attenuation of surface water runoff in

accordance with The National Planning Policy Framework 2024, 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 of the Southwark Plan (2022) P60 Biodiversity, P13 Design of places, P14 Design quality, P56 Protection of amenity

27. Before the first occupation of the development hereby permitted begins, details of the arrangements for the storing of domestic and/or commercial refuse (whichever is applicable) shall be submitted to and approved in writing by the Local Planning Authority. Thereafter, the approved refuse storage facilities shall be provided and made available for use by the occupiers of the development and the facilities shall thereafter be retained and shall not be used or the space used for any other purpose.

Reason: To ensure that the refuse will be appropriately stored within the site thereby protecting the amenity of the site and the area in general from litter, odour and potential vermin/pest nuisance in accordance with Chapters 8 (Promoting healthy and safe communities) and 12 (Achieving well-designed places) of the National Planning Policy Framework (2024); Policy D4 (Delivering good design) of the London Plan (2021); Policy P62 (Reducing Waste) and Policy P66 (Reducing Noise Pollution and Enhancing Soundscapes) of the Southwark Plan (2022).

28. Plant noise

Prior to the occupation of, the rated noise level from any plant including the proposed CHP scheme and energy centre, together with any associated ducting or fittings shall be 10 dB(A) or more below the lowest relevant measured LA90 (15min) at the nearest noise sensitive premises. A validation test shall be carried out prior to any plant being commissioned and the results shall be submitted to the Local Planning Authority for approval in writing prior to the occupation of any units within the relevant block.

Reason

To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of noise nuisance and other excess noise from activities within the commercial premises accordance with Chapter 12 (Achieving well-designed places) of the National Planning Policy Framework (2024); Policies D13 (Agent of change) and D14 (Noise) of the London Plan (2021); P56 (Protection of Amenity) of the Southwark Plan (2022).

## 29. Electric Vehicle Parking

Before the first occupation of any new homes, details of the installation (including location and type) of electric vehicle charger points for that block shall be submitted to and approved in writing by the Local Planning Authority and the electric vehicle charger points shall be installed prior to occupation of the development and the development shall not be carried out otherwise in accordance with any such approval given.

## Reason

To encourage more sustainable travel, in accordance with: Chapter 9 (Promoting sustainable transport) of the National Planning Policy Framework (2024); Policy T6 (Car parking) of the London Plan (2021); Policy P50 (Highways Impacts) and Policy P69 (Sustainability Standards) of the Southwark Plan (2022)

## 30. Service Management Plan

Prior to occupation, a Service Management Plan for that block detailing how all elements of the site are to be serviced, including bin collection and deliveries, shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approval given and shall remain for as long as the development is occupied.

## Reason

Reason: To ensure compliance with: Chapter 9 (Promoting sustainable transport) of the National Planning Policy Framework (2024); Policy T7 (Deliveries, servicing and construction) of the London Plan (2021) and Policy P50 (Highways Impacts) of the Southwark Plan (2022).

## 31. Prior to the commencement of the use hereby granted permission, a Lighting Plan shall be submitted to and approved by the Local Planning Authority. The recommended lighting specification using LED's (at 3 lux) because they have little UV. The spectrum recommended is 80% amber and 20% white with a clear view, no UV, horizontal light spread ideally less than 70 degrees and a timer.

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

## 32. Details of the arrangements for the storing of refuse for the Class E use shall

be submitted to and approved in writing by the Local Planning Authority prior to the unit being brought into use and the facilities approved shall be provided and made available for use by the operators thereafter.

#### Reason

To ensure that the refuse will be appropriately stored within the site thereby protecting the amenity of the site and the area in general from litter, odour and potential vermin/pest nuisance in accordance with Chapters 8 (Promoting healthy and safe communities) and 12 (Achieving well-designed places) of the National Planning Policy Framework (2024); Policy D4 (Delivering good design) of the London Plan (2021); Policy P56 (Protection of amenity) and Policy P62 (Reducing waste) of the Southwark Plan (2022).

33. Prior to the first occupation/use of each Phase of Development hereby approved, a Car Parking Design and Management Plan shall have been submitted to and approved in writing by the Local Planning Authority in consultation with Transport for London.

The submitted details shall demonstrate how the parking spaces are to be designed, managed, operated and monitored; including how residents holding a blue badge will be allocated a parking space.

All parking, including wheelchair accessible vehicle parking for the development shall thereafter be provided and operated in accordance with the approved plan for the lifetime of the development.

Reason: To ensure proper management of the carpark and to secure details of allocation of blue-badge parking spaces in accordance with Policies

P54 Car Parking and P55 Parking standards for disabled people and the physically impaired of the Southwark Plan (2022).

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

34. Residential Internal Noise Levels

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

Bedrooms - 30dB LAeq, T \* and 45dB LAFmax T \*

Living rooms- 35dB LAeq, T#

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

# - Daytime 16 hours between 07:00-23:00.

#### Reason

To ensure that the occupiers and users of the development do not suffer a loss of amenity by reason of excess noise from environmental and transportation sources in accordance with Chapter 8 (Promoting healthy and safe communities) and Chapter 12 (Achieving well-designed places) of the National Planning Policy Framework (2024); Policy D4 (Delivering good design) of the London Plan (2021); Policy P15 (Residential Design), Policy P56 (Protection of Amenity) and Policy P69 (Sustainability Standards) of the Southwark Plan (2022).

#### 35. Residential Noise

Any party ceiling/floor element between a domestic and commercial/community use premises shall be designed and constructed to provide reasonable resistance to the transmission of sound sufficient to ensure that NR20, due to noise from the commercial/community premises, is not exceeded.

#### 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 community use, in accordance with: Chapter 8 (Promoting healthy and safe communities) of the National Planning Policy Framework (2024); Policies D13 (Agent of change) and D14 (Noise) of the London Plan (2021); Policy P66 (Reducing Noise Pollution and Enhancing Soundscapes) of the Southwark Plan (2022).

#### 36. Residential Noise

The habitable rooms within the development sharing a party wall element (wall/ceiling/floor) with a separate residence shall be designed and constructed to provide reasonable resistance to the transmission of sound sufficient to ensure that the party wall is a minimum of 5dB improvement over the Building Regulations standard set out in Approved Document E.

## Reason

To ensure that the occupiers and users of the development do not suffer a loss of amenity by reason of excess noise transfer in accordance with Chapter 8 (Promoting healthy and safe communities) and Chapter 12 (Achieving well-designed places) of the National Planning Policy Framework (2021); Policy D4 (Delivering good design) of the London Plan (2021); Policy P15 (Residential Design), Policy P56 (Protection of Amenity) and Policy P69 (Sustainability Standards) of the Southwark Plan (2022).

## 37. Fire Strategy

The development hereby permitted shall be carried out in accordance with the approved Fire Strategy.

## Reason:

In order to ensure that the fire safety of the proposed development has been duly considered, as required by policy D12 'Fire safety' of the London Plan (2021).

## 38. Vibration

The development must be designed to ensure that habitable rooms in the residential element of the development are not exposed to vibration dose values in excess of 0.13 m/s during the night-time period of 23.00 - 07.00hrs.

## Reason

To ensure that the occupiers and users of the development do not suffer a loss of amenity by reason of excess vibration in accordance with Chapter 8 (Promoting healthy and safe communities) and Chapter 12 (Achieving well-designed places) of the National Planning Policy Framework (2024); Policy D4 (Delivering good design) of the London Plan (2021); Policy P15 (Residential Design), Policy P56 (Protection of Amenity) and Policy P69 (Sustainability Standards) of the Southwark Plan (2022).

## 39. Hours of use

The use hereby permitted for Class E purposes shall not be carried on outside of the hours 7:00 to 23:00 on Monday to Saturday or 08:00 to 22:00 on Sundays and public holidays.

## Reason:

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

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

Arboricultural Site Supervision Part 1: All Arboricultural Supervisory elements to be undertaken in accordance with the approved Arboricultural Method Statement for this site, as evidenced through signed sheets and photographs. Part 2: 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 within 28 days of completion of the development hereby permitted. 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 or pre-appointed tree specialist.

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) and Policy P60 (Biodiversity) of the Southwark Plan (2022).

41. Prior to the new development being first brought into use / occupied, a scheme for monitoring the effectiveness of the biodiversity mitigation and enhancement measures shall be submitted to and approved by the Local Planning Authority. This shall include:

Occupation/inspection of nesting and roosting and invertebrate features including protected species.

Condition of roofs and flora and fauna present.

Survey of ground level landscaping flora and fauna.

The monitoring shall be carried out and reported to the Local Planning Authority in accordance with the agreed scheme for a period of 30 years. Monitoring and reporting should be undertaken in the following years: 1,2,3,5,7,10,15,20,25 and 30. Monitoring reports shall be submitted to Southwark Council. The monitoring shall be carried out and reported to the

Local Planning Authority in accordance with the agreed scheme for a period of 30 years. Species results will be submitted to the London Biological Records Centre, Greenspace Information for Greater London (GIGL).

Reason: to comply with the Biodiversity Net Gain requirements of the Environment Act 2021. To measure the effectiveness of biodiversity mitigation and/or enhancement measures, to see whether the measures achieve the expected biodiversity benefits.

42. Prior to the occupation of each Phase of the Development, the post-construction tab of the GLA's Whole Life-Cycle Carbon Assessment template should be completed in line with the GLA's Whole Life-Cycle Carbon Assessment Guidance.

The post-construction assessment 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 development.

Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings in accordance with policy SI7 of the London Plan 2021.

43. Prior to the occupation of the development a post construction monitoring report should be completed in line with the GLA's Circular Economy Statement Guidance. The report should be submitted to and approved by the LPA in writing.

Reason: In order to maximise the re-use of materials and in the interests of sustainable waste management in accordance with Policy SI7 of the London Plan (2021).

## **Informatives**

- 1 Paragraph 3.12.9 of Policy D12 explains that Fire Statements should be produced by someone who is:

"third-party independent and suitably-qualified" The Council considers this to

be a qualified engineer with relevant experience in fire safety, such as a chartered engineer registered with the Engineering Council by the Institution of Fire Engineers, or a suitably qualified and competent professional with the demonstrable experience to address the complexity of the design being proposed. This should be evidenced in the fire statement. The Council accepts Fire Statements in good faith on that basis. The duty to identify fire risks and hazards in premises and to take appropriate action lies solely with the developer.

The fire risk assessment/statement covers matters required by planning policy. This is in no way a professional technical assessment of the fire risks presented by the development. The legal responsibility and liability lies with the 'responsible person'.

The responsible person being the person who prepares the fire risk assessment/statement not planning officers who make planning decisions.

## Relevant Planning Policy

### National Planning Policy Framework (NPPF)

The revised National Planning Policy Framework ('NPPF') was published in December 2024 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 02 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 8 - Promoting healthy and safe communities
- Section 9 - Promoting sustainable transport
- 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 15 - Conserving and enhancing the natural environment
- 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:

The London Plan is the regional planning framework and was adopted on March 2nd, 2021. The most relevant policies are those listed below.

- Good Growth 1 - Building strong and inclusive communities
- Good Growth 2 - Making the best use of land
- Good Growth 3 - Creating a healthy city
- Good Growth 4 - Delivering the homes Londoners need
- Good Growth 5 - Growing a good economy
- Good Growth 6 - Increasing efficiency and resilience
- Policy SD1 - Opportunity Areas
- Policy SD10 - Strategic and local regeneration
- Policy D1 - London's form, character and capacity for growth
- Policy D2 Infrastructure requirements for sustainable densities
- Policy D3 - Optimising site capacity through the design-led approach
- Policy D4 - Delivering good design
- Policy D5 - Inclusive design

- Policy 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 H8 Loss of existing housing and estate redevelopment
- Policy H10 Housing size mix
- Policy E11 - Skills and opportunities for all
- Policy HC1 - Heritage conservation and growth
- Policy HC3 - Strategic and local views
- Policy G1 - Green infrastructure
- Policy G4 – Open space
- Policy G5 - Urban greening
- Policy G6 - Biodiversity and access to nature
- Policy G7 Trees and woodlands
- Policy G9 Geodiversity
- 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 T7 - Deliveries, servicing and construction

- Policy T9 - Funding transport infrastructure through planning

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:

- SP1 Homes for all
- SP2 – Southwark together
- SP3 – A great start in life
- SP4 – Green and inclusive economy
- SP5 – Thriving neighbourhoods and tackling health inequalities
- SP6 – Climate emergency
- AV. 01 Aylesbury Area Vision
- P1 Social rented and intermediate housing
- P2 New family homes
- P3 Protection of existing homes
- P8 Wheelchair accessible and adaptable housing
- P13 – Design of places
- P14 – Design quality
- P15 Residential design
- P16 – Designing out crime
- P17 – Tall buildings
- P18 – Efficient use of land
- P20 – Conservation areas
- P21 – Conservation of the historic environment and natural heritage
- P22 – Borough views
- P23 – Archaeology
- P26 – Local List
- P28 – Access to employment and training
- P44 – Broadband and digital infrastructure
- P45 – Healthy developments
- P47 Community uses
- P49 – Public transport
- P50 – Highways impacts
- P51 – Walking
- P53 – Cycling
- P54 – Car parking
- P55 Parking standards for disabled people and the physically impaired
- P56 – Protection of amenity
- P57 Open space
- P59 – Green infrastructure
- P60 – Biodiversity
- P61 – Trees

- P62 Reducing waste
- P64 – Contaminated land and hazardous substances
- P65 – Improving air quality
- P66 – Reducing noise pollution and enhancing soundscapes
- P67 – Reducing water use
- P68 – Reducing flood risk
- P69 – Sustainability standards
- P70 – Energy
- IP1 – Infrastructure
- IP2 – Transport infrastructure
- IP3 – Community infrastructure levy (CIL) and Section 106 planning obligations
- IP6 – Monitoring development
- IP7 – Statement of Community Involvement
- NSP01 Aylesbury Action Are Core

## APPENDIX 3

## Planning history of the site and nearby sites

Reference and proposal	Status
<p><b>14/AP/3843</b> Demolition of existing buildings and redevelopment to provide a mixed use development comprising a number of buildings ranging between 2 to 20 storeys in height (9.45m - 72.2m AOD), providing 830 residential dwellings (Class C3); flexible community use, early years facility (Class D1) or gym (Class D2); public and private open space; formation of new accesses and alterations to existing accesses; energy centre; gas pressure reduction station; associated car and cycle parking and associated works.</p>	<p>Granted with Legal Agreement 05/08/2015</p>
<p><b>14/AP/3844</b> Outline application for: demolition of existing buildings and phased redevelopment to provide a mixed use development comprising a number of buildings ranging between 2 to 20 storeys in height (12.45m - 68.85m AOD) with capacity for up to 2,745 residential units (Class C3), up to 2,500sqm of employment use (Class B1); up to 500sqm of retail space (Class A1); 3,100 to 4,750sqm of community use; medical centre and early years facility (Class D1); in addition to up to 3,000sqm flexible retail use (Class A1/A3/A4) or workspace use (Class B1); new landscaping; parks, public realm; energy centre; gas pressure reduction station; up to 1,098 car parking spaces; cycle parking; landscaping and associated works.</p>	<p>Granted with Legal Agreement 05/08/2015</p>
<p><b>17/AP/3885</b> Minor material amendments to planning permission 14/AP/3843 for Demolition of existing buildings and redevelopment to provide a mixed use development comprising a number of buildings ranging between 2 to 20 storeys in height (9.45m - 72.2m AOD), providing 830 residential dwellings (Class C3); flexible community use, early years facility (Class D1) or gym (Class D2); public and private open space; formation of new accesses and alterations to existing accesses; energy centre; gas pressure reduction station; associated car and cycle parking and associated works. The proposed amendments include: Provision of an additional 12 units (including three townhouses in place of the Gas Pressure Reduction Station); Revisions to unit and tenure mix; Internal reconfiguration and elevational alterations; Minor alterations to landscape layouts, amenity space and roof space.</p>	<p>Granted with Legal Agreement 14/02/2019</p>
<p><b>22/AP/0019</b> Non material amendment to planning permission ref. 17/AP/3885 dated 14th February 2019 for 'Minor material amendments to planning permission 14/AP/3843 for Demolition of existing buildings and redevelopment to provide a mixed use development comprising a number of buildings ranging between 2 to 20 storeys in height</p>	<p>AGREED 04/02/2022</p>

<p>(9.45m - 72.2m AOD), providing 830 residential dwellings (Class C3); flexible community use, early years facility (Class D1) or gym (Class D2); public and private open space; formation of new accesses and alterations to existing accesses; energy centre; gas pressure reduction station; associated car and cycle parking and associated works. The amendment seeks the following: to amend the wording of the description of development and add a new planning condition specifying the quantum of the approved development.</p>	
<p><b>23/AP/0062</b>  Non material amendment of planning permission ref. no. 14/AP/3844 (Outline application for: demolition of existing buildings and phased redevelopment to provide a mixed use development comprising a number of buildings ranging between 2 to 20 storeys in height (12.45m - 68.85m AOD) with capacity for up to 2,745 residential units (Class C3), up to 2,500sqm of employment use (Class B1); up to 500sqm of retail space (Class A1); 3,100 to 4,750sqm of community use; medical centre and early years facility (Class D1); in addition to up to 3,000sqm flexible retail use (Class A1/A3/A4) or workspace use (Class B1); new landscaping; parks, public realm; energy centre; gas pressure reduction station; up to 1,098 car parking spaces; cycle parking; landscaping and associated works). NMA sought: to amend the description of the proposal to include the words 'a severable' to the following description:  demolition of existing buildings and a severable phased redevelopment to provide a mixed use development comprising a number of buildings ranging between 2 to 20 storeys in height (12.45m - 68.85m AOD) with capacity for up to 2,745 residential units (Class C3), up to 2,500sqm of employment use (Class B1); up to 500sqm of retail space (Class A1); 3,100 to 4,750sqm of community use; medical centre and early years facility (Class D1); in addition to up to 3,000sqm flexible retail use (Class A1/A3/A4) or workspace use (Class B1); new landscaping; parks, public realm; energy centre; gas pressure reduction station; up to 1,098 car parking spaces; cycle parking; landscaping and associated works.</p>	<p>Agreed  28/03/2023.  Challenged  via a Judicial  Review to  the High  Court - R  (Dennis) v  LB  Southwark  [2024].  Decision  subsequently  quashed.</p>

## Consultation undertaken

**Site notice date:** 27/03/2025

**Press notice date:** 13/03/2025

**Case officer site visit date:** n/a

**Neighbour consultation letters sent:** 10/04/2025

## Internal services consulted

LBS Ecology Officer

LBS Arboricultural Services Team

LBS Archaeologist

LBS CCTV - Public Space Surveillance

LBS Community Infrastructure Team

LBS Network Developments Construction Management Plans

LBS Design And Conservation Team [Formal Consultation]

LBS Local Economy

LBS Ecology Officer

LBS Environmental Protection Team

LBS Highways Development & Management

LBS Old Kent Road Regeneration Team

LBS Parks And Cemeteries Team

LBS Planning Policy [Formal Consultation] - General

Flood Risk Management & Urban Drainage Team

LBS Transport Policy Team

LBS Urban Forester

LBS Waste Management Team

LBS Arboricultural Services Team

LBS Arboricultural Services Team

LBS Archaeologist  
 LBS Community Infrastructure Team  
 LBS Network Developments Construction Management Plans  
 LBS Design And Conservation Team [Formal Consultation]  
 LBS Local Economy  
 LBS Ecology Officer  
 LBS Environmental Protection Team  
 LBS Highways Development & Management  
 LBS Parks And Cemeteries Team  
 Flood Risk Management & Urban Drainage Team  
 LBS Transport Policy Team  
 LBS Urban Forester  
 LBS Waste Management Team

### **Statutory and non-statutory organisations**

Arqiva  
 Civil Aviation Authority  
 Dept. For Housing, Communities & Local Government  
 Historic England - Scheduled Ancient Monuments  
 Environment Agency  
 Fire And Emergency Department  
 Friends Of Burgess Park  
 Friends Of Park - Burgess  
 Greater London Authority  
 Heathrow Airport Safeguarding  
 HSE Fire Risk Assessments  
 London Borough Of Lambeth  
 LB Lewisham  
 London Fire & Emergency Planning Authority  
 London Underground

Natural England - London Region & South East Region

National Air Traffic Safeguarding Office

NHS London Healthy Urban Development Unit

Metropolitan Police Service (Designing Out Crime)

Transport For London

Thames Water

Arqiva

Civil Aviation Authority

Dept. For Housing, Communities & Local Government

Historic England - Scheduled Ancient Monuments

Environment Agency

Fire And Emergency Department

Friends Of Burgess Park

Greater London Authority

Heathrow Airport Safeguarding

HSE Fire Risk Assessments

London Borough Of Lambeth

LB Lewisham

London Fire & Emergency Planning Authority

London Underground

Natural England - London Region & South East Region

National Air Traffic Safeguarding Office

Metropolitan Police Service (Designing Out Crime)

Transport For London

Thames Water

### **Neighbour and local groups consulted:**

134 Latimer Beaconsfield Road London

366 Wendover Thurlow Street London

136 Latimer Beaconsfield Road London

412 Wendover Thurlow Street London

67 Ravenstone Bagshot Street London

386 Wendover Thurlow Street London

374 Wendover Thurlow Street London  
 359 Wendover Thurlow Street London  
 34 Latimer Beaconsfield Road London  
 49 Ravenstone Bagshot Street London  
 42 Ravenstone Bagshot Street London  
 41 Ravenstone Bagshot Street London  
 3 Ravenstone Bagshot Street London  
 20 Ravenstone Bagshot Street London  
 15 Ravenstone Bagshot Street London  
 349 Wendover Thurlow Street London  
 304 Wendover Thurlow Street London  
 Flat 7 47-53 Bagshot Street London  
 225 Wendover Thurlow Street London  
 188 Wolverton Alvey Street London  
 102A Smyrks Road London Southwark  
 19 Bagshot Street London Southwark  
 87 Mina Road London Southwark  
 96 Smyrks Road London Southwark  
 91 Smyrks Road London Southwark  
 86 Smyrks Road London Southwark  
 109A Kinglake Street London Southwark  
 Flat 3 25 Bagshot Street London  
 Flat 1 109 Kinglake Street London  
 Flat 15 Tenterden House Kinglake Estate Kinglake Street  
 Flat 30 Bethersden House Kinglake Estate Kinglake Street  
 Flat 1 Bethersden House Kinglake Estate Kinglake Street  
 Flat 6 Faversham House Kinglake Estate Kinglake Street  
 Flat 8 Keston House Kinglake Estate Kinglake Street  
 Flat 10 Emberton 190 Albany Road 202A Albany Road London Southwark  
 Flat 7 Emberton 190 Albany Road  
 Flat 24 Emberton 190 Albany Road  
 296 Wendover Thurlow Street London  
 276 Wendover Thurlow Street London  
 273 Wendover Thurlow Street London  
 272 Wendover Thurlow Street London  
 86 Latimer Beaconsfield Road London  
 9 Winslow Kinglake Street London  
 2 Winslow Kinglake Street London  
 163 Wolverton Alvey Street London  
 241 Wendover Thurlow Street London  
 461 Wendover Thurlow Street London  
 450 Wendover Thurlow Street London  
 449 Wendover Thurlow Street London  
 435 Wendover Thurlow Street London  
 111 Latimer Beaconsfield Road London  
 105 Mina Road London Southwark  
 17 Winslow Kinglake Street London  
 55 Latimer Beaconsfield Road London  
 158 Wolverton Alvey Street London  
 5 Padbury Bagshot Street London  
 23 Padbury Bagshot Street London  
 77 Ravenstone Bagshot Street London  
 174 Wolverton Alvey Street London  
 207 Wendover Thurlow Street London  
 242 Wendover Thurlow Street London  
 457 Wendover Thurlow Street London

455 Wendover Thurlow Street London  
 425 Wendover Thurlow Street London  
 132 Latimer Beaconsfield Road London  
 128 Latimer Beaconsfield Road London  
 114 Latimer Beaconsfield Road London  
 52 Latimer Beaconsfield Road London  
 6 Padbury Bagshot Street London  
 25 Padbury Bagshot Street London  
 17 Padbury Bagshot Street London  
 1 Padbury Bagshot Street London  
 75 Ravenstone Bagshot Street London  
 61 Ravenstone Bagshot Street London  
 6 Ravenstone Bagshot Street London  
 421 Wendover Thurlow Street London  
 395 Wendover Thurlow Street London  
 380 Wendover Thurlow Street London  
 377 Wendover Thurlow Street London  
 365 Wendover Thurlow Street London  
 360 Wendover Thurlow Street London  
 37 Latimer Beaconsfield Road London  
 32 Ravenstone Bagshot Street London  
 27 Ravenstone Bagshot Street London  
 24 Ravenstone Bagshot Street London  
 12 Ravenstone Bagshot Street London  
 334 Wendover Thurlow Street London  
 313 Wendover Thurlow Street London  
 230 Wendover Thurlow Street London  
 154 Wendover Thurlow Street London  
 139 Wendover Thurlow Street London  
 78A Smyrks Road London Southwark  
 192 Wolverton Alvey Street London  
 189 Wolverton Alvey Street London  
 184 Wolverton Alvey Street London  
 98 Mina Road London Southwark  
 91 Mina Road London Southwark  
 85 Smyrks Road London Southwark  
 Flat 12 109 Kinglake Street London  
 Flat 7 109 Kinglake Street London  
 Flat 13 Domville Court 70 Bagshot Street  
 Ground Floor Flat 93 Mina Road London  
 239 Wendover Thurlow Street London  
 137 Latimer Beaconsfield Road London  
 420 Wendover Thurlow Street London  
 76 Ravenstone Bagshot Street London  
 48 Ravenstone Bagshot Street London  
 Flat 41 Keston House Kinglake Estate  
 Kinglake Street  
 Flat 1 Southborough House Kinglake  
 Estate Kinglake Street  
 53 Latimer Beaconsfield Road London  
 355 Wendover Thurlow Street London  
 10 Ravenstone Bagshot Street London  
 27 Winslow Kinglake Street London  
 286 Wendover Thurlow Street London  
 72 Ravenstone Bagshot Street London  
 Keston House Kinglake Estate Kinglake  
 Street London  
 Flat 9 Keston House Kinglake Estate  
 Kinglake Street  
 58 Latimer Beaconsfield Road London  
 Flat 34 Emberton 190 Albany Road  
 414 Wendover Thurlow Street London

Flat 37 Keston House Kinglake Estate  
Kinglake Street

Flat 6 Tenterden House Kinglake Estate  
Kinglake Street

212 Wendover Thurlow Street London

396 Wendover Thurlow Street London

376 Wendover Thurlow Street London

Flat 27 Southborough House Kinglake  
Estate Kinglake Street

117 Wendover Thurlow Street London

40 Ravenstone Bagshot Street London

361 Wendover Thurlow Street London

255 Wendover Thurlow Street London

454 Wendover Thurlow Street London

54 Latimer Beaconsfield Road London

371 Wendover Thurlow Street London

108 Mina Road London Southwark

267 Wendover Thurlow Street London

Flat 33 Keston House Kinglake Estate  
Kinglake Street

Living Accommodation 131 Beaconsfield  
Road London

229 Wendover Thurlow Street London

Flat 26 Faversham House Kinglake  
Estate Kinglake Street

95 Mina Road London Southwark

81 Mina Road London Southwark

266 Wendover Thurlow Street London

175 Wolverton Alvey Street London

245 Wendover Thurlow Street London

Flat 5 Keston House Kinglake Estate  
Kinglake Street

372 Wendover Thurlow Street London

109 Kinglake Street London Southwark

433 Wendover Thurlow Street London

430 Wendover Thurlow Street London

Flat 35 Keston House Kinglake Estate  
Kinglake Street

Flat 24 Keston House Kinglake Estate  
Kinglake Street

Flat 16 Keston House Kinglake Estate  
Kinglake Street

Flat 13 Keston House Kinglake Estate  
Kinglake Street

370 Wendover Thurlow Street London

Flat 17 Southborough House Kinglake  
Estate Kinglake Street

Flat 25 Bethersden House Kinglake  
Estate Kinglake Street

358 Wendover Thurlow Street London

33A Bagshot Street London Southwark

21 Ravenstone Bagshot Street London

13 Ravenstone Bagshot Street London

Flat 21 Faversham House Kinglake  
Estate Kinglake Street

262 Wendover Thurlow Street London

94B Smyrks Road London Southwark

456 Wendover Thurlow Street London

35 Latimer Beaconsfield Road London

339 Wendover Thurlow Street London

333 Wendover Thurlow Street London

3 Winslow Kinglake Street London

170 Wolverton Alvey Street London

7 Padbury Bagshot Street London

21 Padbury Bagshot Street London

13 Padbury Bagshot Street London

116 Albany Road London Southwark	Flat 11 Faversham House Kinglake Estate Kinglake Street
New Deal For Communities Wendover Thurlow Street	Flat 7 Keston House Kinglake Estate Kinglake Street
Flat 7 Domville Court 70 Bagshot Street	Flat 48 Keston House Kinglake Estate Kinglake Street
383 Wendover Thurlow Street London	Flat 45 Keston House Kinglake Estate Kinglake Street
415 Wendover Thurlow Street London	246 Wendover Thurlow Street London
397 Wendover Thurlow Street London	327 Wendover Thurlow Street London
391 Wendover Thurlow Street London	102B Smyrks Road London Southwark
363 Wendover Thurlow Street London	15 Winslow Kinglake Street London
362 Wendover Thurlow Street London	Flat 35 Emberton 190 Albany Road
33 Latimer Beaconsfield Road London	21 Winslow Kinglake Street London
25 Ravenstone Bagshot Street London	Flat 32 Emberton 190 Albany Road
347 Wendover Thurlow Street London	102 Albany Road London Southwark
344 Wendover Thurlow Street London	127 Latimer Beaconsfield Road London
324 Wendover Thurlow Street London	59 Latimer Beaconsfield Road London
315 Wendover Thurlow Street London	42 Latimer Beaconsfield Road London
Flat 6 47-53 Bagshot Street London	179 Wolverton Alvey Street London
136 Wendover Thurlow Street London	104 Mina Road London Southwark
76B Smyrks Road London Southwark	283 Wendover Thurlow Street London
25-27 Bagshot Street London Southwark	50 Ravenstone Bagshot Street London
17 Bagshot Street London Southwark	308 Wendover Thurlow Street London
88 Mina Road London Southwark	Flat 1 Domville Court 70 Bagshot Street
Flat 2 122 Albany Road London	Flat 4 37 Bagshot Street London
Flat 5 25 Bagshot Street London	Flat 6 109 Kinglake Street London
Flat 7 Faversham House Kinglake Estate Kinglake Street	Flat 49 Keston House Kinglake Estate Kinglake Street
220 Wendover Thurlow Street London	Flat 40 Keston House Kinglake Estate Kinglake Street
16 Ravenstone Bagshot Street London	Flat 3 Keston House Kinglake Estate Kinglake Street
451 Wendover Thurlow Street London	
Flat 2 Faversham House Kinglake Estate Kinglake Street	

Flat 19 Keston House Kinglake Estate  
Kinglake Street

Flat 10 Keston House Kinglake Estate  
Kinglake Street

Winslow Kinglake Street London

Flat 20 Tenterden House Kinglake  
Estate Kinglake Street

Flat 17 Tenterden House Kinglake  
Estate Kinglake Street

Flat 23 Southborough House Kinglake  
Estate Kinglake Street

Flat 21 Southborough House Kinglake  
Estate Kinglake Street

Flat 8 Bethersden House Kinglake  
Estate Kinglake Street

Flat 5 Bethersden House Kinglake  
Estate Kinglake Street

Flat 22 Bethersden House Kinglake  
Estate Kinglake Street

Flat 11 Bethersden House Kinglake  
Estate Kinglake Street

118 Albany Road London Southwark

124 Wendover Thurlow Street London

121 Wendover Thurlow Street London

7 Winslow Kinglake Street London

4 Winslow Kinglake Street London

172 Wolverton Alvey Street London

48 Latimer Beaconsfield Road London

121 Latimer Beaconsfield Road London

118 Latimer Beaconsfield Road London

50 Latimer Beaconsfield Road London

81 Smyrks Road London Southwark

103 Smyrks Road London Southwark

277 Wendover Thurlow Street London

60 Ravenstone Bagshot Street London

35 Bagshot Street London Southwark

Flat 14 Domville Court 70 Bagshot Street

Flat 9 109 Kinglake Street London

Flat 44 Keston House Kinglake Estate  
Kinglake Street

Flat 7 Tenterden House Kinglake Estate  
Kinglake Street

Flat 6 Southborough House Kinglake  
Estate Kinglake Street

Flat 16 Bethersden House Kinglake  
Estate Kinglake Street

Ravenstone Bagshot Street London

Flat 25 Faversham House Kinglake  
Estate Kinglake Street

Flat 1 Faversham House Kinglake Estate  
Kinglake Street

122 Albany Road London Southwark

104 Albany Road London Southwark

Flat 30 Emberton 190 Albany Road

Flat 21 Emberton 190 Albany Road

Flat 19 Emberton 190 Albany Road

127 Wendover Thurlow Street London

119 Wendover Thurlow Street London

22 Winslow Kinglake Street London

162 Wolverton Alvey Street London

256 Wendover Thurlow Street London

250 Wendover Thurlow Street London

247 Wendover Thurlow Street London

467 Wendover Thurlow Street London

452 Wendover Thurlow Street London

446 Wendover Thurlow Street London

443 Wendover Thurlow Street London

434 Wendover Thurlow Street London	254A Wendover Thurlow Street London
140 Latimer Beaconsfield Road London	224 Wendover Thurlow Street London
139 Latimer Beaconsfield Road London	219 Wendover Thurlow Street London
129 Latimer Beaconsfield Road London	151 Wendover Thurlow Street London
123 Latimer Beaconsfield Road London	149 Wendover Thurlow Street London
122 Latimer Beaconsfield Road London	145 Wendover Thurlow Street London
14 Padbury Bagshot Street London	186 Wolverton Alvey Street London
423 Wendover Thurlow Street London	92B Smyrks Road London Southwark
168 Wolverton Alvey Street London	112 Mina Road London Southwark
244 Wendover Thurlow Street London	97 Smyrks Road London Southwark
429 Wendover Thurlow Street London	Flat 1 122 Albany Road London
14 Winslow Kinglake Street London	Flat 8 109 Kinglake Street London
11 Winslow Kinglake Street London	Flat 3 Domville Court 70 Bagshot Street
116 Latimer Beaconsfield Road London	288 Wendover Thurlow Street London
7 Ravenstone Bagshot Street London	438 Wendover Thurlow Street London
59 Ravenstone Bagshot Street London	5 Winslow Kinglake Street London
401 Wendover Thurlow Street London	385 Wendover Thurlow Street London
400 Wendover Thurlow Street London	100 Mina Road London Southwark
389 Wendover Thurlow Street London	Flat 14 Keston House Kinglake Estate Kinglake Street
381 Wendover Thurlow Street London	Flat 18 Emberton 190 Albany Road
46 Latimer Beaconsfield Road London	Flat 20 Southborough House Kinglake Estate Kinglake Street
30 Latimer Beaconsfield Road London	427 Wendover Thurlow Street London
17 Ravenstone Bagshot Street London	Flat 22 Keston House Kinglake Estate Kinglake Street
14 Ravenstone Bagshot Street London	Flat 2 Tenterden House Kinglake Estate Kinglake Street
350 Wendover Thurlow Street London	Flat 14 Tenterden House Kinglake Estate Kinglake Street
335 Wendover Thurlow Street London	First Floor Flat 35 Bagshot Street London
325 Wendover Thurlow Street London	203 Wendover Thurlow Street London
321 Wendover Thurlow Street London	
319 Wendover Thurlow Street London	
Flat 4 47-53 Bagshot Street London	

Flat 8 Southborough House Kinglake Estate Kinglake Street  
 405 Wendover Thurlow Street London  
 Flat 24 Southborough House Kinglake Estate Kinglake Street  
 Flat 19 Southborough House Kinglake Estate Kinglake Street  
 Flat 15 Bethersden House Kinglake Estate Kinglake Street  
 Flat 19 Bethersden House Kinglake Estate Kinglake Street  
 8 Ravenstone Bagshot Street London  
 8 Padbury Bagshot Street London  
 22 Padbury Bagshot Street London  
 11 Padbury Bagshot Street London  
 65 Ravenstone Bagshot Street London  
 64 Ravenstone Bagshot Street London  
 416 Wendover Thurlow Street London  
 413 Wendover Thurlow Street London  
 398 Wendover Thurlow Street London  
 31 Latimer Beaconsfield Road London  
 47 Ravenstone Bagshot Street London  
 343 Wendover Thurlow Street London  
 44 Ravenstone Bagshot Street London  
 28 Ravenstone Bagshot Street London  
 1 Ravenstone Bagshot Street London  
 340 Wendover Thurlow Street London  
 337 Wendover Thurlow Street London  
 331 Wendover Thurlow Street London  
 329 Wendover Thurlow Street London  
 316 Wendover Thurlow Street London  
 309 Wendover Thurlow Street London

303 Wendover Thurlow Street London  
 251A Wendover Thurlow Street London  
 237 Wendover Thurlow Street London  
 228 Wendover Thurlow Street London  
 100B Smyrks Road London Southwark  
 99 Mina Road London Southwark  
 79 Mina Road London Southwark  
 88 Smyrks Road London Southwark  
 33 Bagshot Street London Southwark  
 Street Record Surrey Grove London  
 Flat 8 37 Bagshot Street London  
 469 Wendover Thurlow Street London  
 437 Wendover Thurlow Street London  
 180 Wolverton Alvey Street London  
 Flat A 1 Surrey Grove London  
 47-53 Bagshot Street London Southwark  
 Aylesbury Learning Centre Wendover Thurlow Street  
 Flat 12 Keston House Kinglake Estate Kinglake Street  
 Flat 3 Southborough House Kinglake Estate Kinglake Street  
 156 Wendover Thurlow Street London  
 356 Wendover Thurlow Street London  
 146 Wendover Thurlow Street London  
 94A Smyrks Road London Southwark  
 9 Padbury Bagshot Street London  
 15 Padbury Bagshot Street London  
 285 Wendover Thurlow Street London  
 Flat 6 37 Bagshot Street London  
 346 Wendover Thurlow Street London  
 190 Wolverton Alvey Street London

436 Wendover Thurlow Street London  
 235 Wendover Thurlow Street London  
 126 Wendover Thurlow Street London  
 120 Wendover Thurlow Street London  
 367 Wendover Thurlow Street London  
 226 Wendover Thurlow Street London  
 150 Wendover Thurlow Street London  
 342 Wendover Thurlow Street London  
 Flat 15 Faversham House Kinglake Estate Kinglake Street  
 103 Mina Road London Southwark  
 336 Wendover Thurlow Street London  
 8 Winslow Kinglake Street London  
 113 Latimer Beaconsfield Road London  
 141 Latimer Beaconsfield Road London  
 167 Wolverton Alvey Street London  
 124 Latimer Beaconsfield Road London  
 1 Winslow Kinglake Street London  
 Flat 25 Emberton 190 Albany Road  
 Flat 22 Emberton 190 Albany Road  
 95 Smyrks Road London Southwark  
 87 Smyrks Road London Southwark  
 274 Wendover Thurlow Street London  
 268 Wendover Thurlow Street London  
 81 Ravenstone Bagshot Street London  
 58 Ravenstone Bagshot Street London  
 Flat 16 Domville Court 70 Bagshot Street  
 Flat 11 Domville Court 70 Bagshot Street  
 Flat 47 Keston House Kinglake Estate Kinglake Street  
 Flat 31 Keston House Kinglake Estate Kinglake Street  
 Flat 3 Tenterden House Kinglake Estate Kinglake Street  
 Flat 13 Tenterden House Kinglake Estate Kinglake Street  
 Flat 12 Tenterden House Kinglake Estate Kinglake Street  
 Flat 16 Southborough House Kinglake Estate Kinglake Street  
 Padbury Bagshot Street London  
 Flat 20 Faversham House Kinglake Estate Kinglake Street  
 100 Albany Road London Southwark  
 Flat 9 Emberton 190 Albany Road  
 Flat 5 Emberton 190 Albany Road  
 Flat 33 Emberton 190 Albany Road  
 275 Wendover Thurlow Street London  
 Flat 26 Emberton 190 Albany Road  
 295 Wendover Thurlow Street London  
 292 Wendover Thurlow Street London  
 258 Wendover Thurlow Street London  
 208 Wendover Thurlow Street London  
 128 Wendover Thurlow Street London  
 125 Wendover Thurlow Street London  
 6 Winslow Kinglake Street London  
 26 Winslow Kinglake Street London  
 25 Winslow Kinglake Street London  
 165 Wolverton Alvey Street London  
 440 Wendover Thurlow Street London  
 131 Latimer Beaconsfield Road London  
 119 Latimer Beaconsfield Road London  
 159 Wolverton Alvey Street London  
 20 Padbury Bagshot Street London

2 Padbury Bagshot Street London  
 18 Padbury Bagshot Street London  
 57 Ravenstone Bagshot Street London  
 406 Wendover Thurlow Street London  
 404 Wendover Thurlow Street London  
 384 Wendover Thurlow Street London  
 375 Wendover Thurlow Street London  
 369 Wendover Thurlow Street London  
 368 Wendover Thurlow Street London  
 357 Wendover Thurlow Street London  
 39 Latimer Beaconsfield Road London  
 46 Ravenstone Bagshot Street London  
 30 Ravenstone Bagshot Street London  
 353 Wendover Thurlow Street London  
 352 Wendover Thurlow Street London  
 332 Wendover Thurlow Street London  
 318 Wendover Thurlow Street London  
 310 Wendover Thurlow Street London  
 240 Wendover Thurlow Street London  
 148 Wendover Thurlow Street London  
 140 Wendover Thurlow Street London  
 181 Wolverton Alvey Street London  
 178 Wolverton Alvey Street London  
 96 Mina Road London Southwark  
 77 Mina Road London Southwark  
 75 Mina Road London Southwark  
 56 Ravenstone Bagshot Street London  
 98 Smyrks Road London Southwark  
 Flat 10 Domville Court 70 Bagshot Street  
 222 Wendover Thurlow Street London  
 35 Ravenstone Bagshot Street London  
 284 Wendover Thurlow Street London  
 160 Wolverton Alvey Street London  
 417 Wendover Thurlow Street London  
 259 Wendover Thurlow Street London  
 187 Wolverton Alvey Street London  
 306 Wendover Thurlow Street London  
 2 Ravenstone Bagshot Street London  
 Flat 7 Southborough House Kinglake Estate Kinglake Street  
 202 Wendover Thurlow Street London  
 161 Wolverton Alvey Street London  
 22 Ravenstone Bagshot Street London  
 445 Wendover Thurlow Street London  
 439 Wendover Thurlow Street London  
 422 Wendover Thurlow Street London  
 348 Wendover Thurlow Street London  
 Flat 18 Tenterden House Kinglake Estate Kinglake Street  
 218 Wendover Thurlow Street London  
 215 Wendover Thurlow Street London  
 382 Wendover Thurlow Street London  
 379 Wendover Thurlow Street London  
 Flat 17 Bethersden House Kinglake Estate Kinglake Street  
 129 Wendover Thurlow Street London  
 238 Wendover Thurlow Street London  
 147 Wendover Thurlow Street London  
 76A Smyrks Road London Southwark  
 465 Wendover Thurlow Street London  
 462 Wendover Thurlow Street London  
 40 Latimer Beaconsfield Road London

138 Latimer Beaconsfield Road London	Flat 29 Emberton 190 Albany Road
133 Latimer Beaconsfield Road London	Flat 16 Emberton 190 Albany Road
12 Winslow Kinglake Street London	290 Wendover Thurlow Street London
185 Wolverton Alvey Street London	289 Wendover Thurlow Street London
280 Wendover Thurlow Street London	279 Wendover Thurlow Street London
79 Ravenstone Bagshot Street London	278 Wendover Thurlow Street London
131 Beaconsfield Road London	269 Wendover Thurlow Street London
Southwark	263 Wendover Thurlow Street London
Flat 19 Tenterden House Kinglake Estate Kinglake Street	214 Wendover Thurlow Street London
317 Wendover Thurlow Street London	210 Wendover Thurlow Street London
Flat 38 Keston House Kinglake Estate Kinglake Street	122 Wendover Thurlow Street London
Flat 27 Keston House Kinglake Estate Kinglake Street	248 Wendover Thurlow Street London
Flat 10 Tenterden House Kinglake Estate Kinglake Street	464 Wendover Thurlow Street London
Flat 2 Southborough House Kinglake Estate Kinglake Street	460 Wendover Thurlow Street London
Flat 18 Southborough House Kinglake Estate Kinglake Street	444 Wendover Thurlow Street London
Flat 15 Southborough House Kinglake Estate Kinglake Street	431 Wendover Thurlow Street London
Flat 13 Southborough House Kinglake Estate Kinglake Street	426 Wendover Thurlow Street London
Flat 24 Bethersden House Kinglake Estate Kinglake Street	112 Latimer Beaconsfield Road London
Flat 11A Faversham House Kinglake Estate Kinglake Street	16 Winslow Kinglake Street London
Flat 12 Faversham House Kinglake Estate Kinglake Street	117 Latimer Beaconsfield Road London
Flat 10 Faversham House Kinglake Estate Kinglake Street	60 Latimer Beaconsfield Road London
110 Albany Road London Southwark	51 Latimer Beaconsfield Road London
Flat 31 Emberton 190 Albany Road	49 Latimer Beaconsfield Road London
	9 Ravenstone Bagshot Street London
	80 Ravenstone Bagshot Street London
	78 Ravenstone Bagshot Street London
	74 Ravenstone Bagshot Street London
	68 Ravenstone Bagshot Street London
	418 Wendover Thurlow Street London
	378 Wendover Thurlow Street London

41 Latimer Beaconsfield Road London  
 36 Ravenstone Bagshot Street London  
 18 Ravenstone Bagshot Street London  
 11 Ravenstone Bagshot Street London  
 341 Wendover Thurlow Street London  
 328 Wendover Thurlow Street London  
 312 Wendover Thurlow Street London  
 301 Wendover Thurlow Street London  
 300 Wendover Thurlow Street London  
 256A Wendover Thurlow Street London  
 234 Wendover Thurlow Street London  
 233 Wendover Thurlow Street London  
 78B Smyrks Road London Southwark  
 231 Wendover Thurlow Street London  
 137 Wendover Thurlow Street London  
 191 Wolverton Alvey Street London  
 37 Bagshot Street London Southwark  
 106 Mina Road London Southwark  
 102 Mina Road London Southwark  
 105 Smyrks Road London Southwark  
 25 Bagshot Street London Southwark  
 Flat 2 109 Kinglake Street London  
 Flat 5 Domville Court 70 Bagshot Street  
 Flat 15 Domville Court 70 Bagshot Street  
 Flat 43 Keston House Kinglake Estate  
 Kinglake Street  
 Flat 2 Keston House Kinglake Estate  
 Kinglake Street  
 227 Wendover Thurlow Street London  
 118 Wendover Thurlow Street London  
 198 Albany Road London Southwark  
 83 Smyrks Road London Southwark  
 183 Wolverton Alvey Street London  
 126 Latimer Beaconsfield Road London  
 410 Wendover Thurlow Street London  
 83 Mina Road London Southwark  
 61 Latimer Beaconsfield Road London  
 138 Wendover Thurlow Street London  
 Flat 11 Keston House Kinglake Estate  
 Kinglake Street  
 Flat 22 Southborough House Kinglake  
 Estate Kinglake Street  
 Flat 10 Southborough House Kinglake  
 Estate Kinglake Street  
 Flat 3 Bethersden House Kinglake  
 Estate Kinglake Street  
 Flat 28 Bethersden House Kinglake  
 Estate Kinglake Street  
 Flat 23 Bethersden House Kinglake  
 Estate Kinglake Street  
 Flat 21 Bethersden House Kinglake  
 Estate Kinglake Street  
 364 Wendover Thurlow Street London  
 351 Wendover Thurlow Street London  
 31 Ravenstone Bagshot Street London  
 29 Ravenstone Bagshot Street London  
 26 Ravenstone Bagshot Street London  
 448 Wendover Thurlow Street London  
 Flat 4 Faversham House Kinglake Estate  
 Kinglake Street  
 Flat 13 Faversham House Kinglake  
 Estate Kinglake Street  
 330 Wendover Thurlow Street London  
 110 Mina Road London Southwark  
 99 Smyrks Road London Southwark

Street Record C5840007 London  
 Flat 4 Domville Court 70 Bagshot Street  
 93 Smyrks Road London Southwark  
 79 Smyrks Road London Southwark  
 77 Smyrks Road London Southwark  
 Flat 10 109 Kinglake Street London  
 101 Smyrks Road London Southwark  
 Joyce Meggie House 1 Haywood Street  
 London  
 93B Mina Road London Southwark  
 122A Albany Road London Southwark  
 Flat B 1 Surrey Grove London  
 120 Albany Road London Southwark  
 89 Smyrks Road London Southwark  
 Flat 4 25 Bagshot Street London  
 Flat 1 25 Bagshot Street London  
 Thurlow Lodge Tenants Hall 1 Thurlow  
 Street London  
 Street Record Smyrks Road London  
 Flat 8 Domville Court 70 Bagshot Street  
 Aylesbury Estate Site Phase 2B Thurlow  
 Street London  
 85 Mina Road London Southwark  
 322 Wendover Thurlow Street London  
 21 Bagshot Street London Southwark  
 403 Wendover Thurlow Street London  
 Flat 3 47-53 Bagshot Street London  
 Flat 13 Emberton 190 Albany Road  
 3 Padbury Bagshot Street London  
 12 Padbury Bagshot Street London  
 70 Ravenstone Bagshot Street London  
 51 Ravenstone Bagshot Street London  
 302 Wendover Thurlow Street London  
 459 Wendover Thurlow Street London  
 19 Ravenstone Bagshot Street London  
 Flat 7 37 Bagshot Street London  
 Flat 9 Domville Court 70 Bagshot Street  
 First Floor Under 241-471 Wendover  
 Thurlow Street  
 110 Latimer Beaconsfield Road London  
 Flat 4 109 Kinglake Street London  
 Flat 10 Bethersden House Kinglake  
 Estate Kinglake Street  
 453 Wendover Thurlow Street London  
 Flat 1 Tenterden House Kinglake Estate  
 Kinglake Street  
 Flat 30 Keston House Kinglake Estate  
 Kinglake Street  
 Bethersden House Kinglake Estate  
 Kinglake Street London  
 Street Record Haywood Street London  
 Flat 5 37 Bagshot Street London  
 1 Surrey Grove London Southwark  
 92A Smyrks Road London Southwark  
 Flat 9 Faversham House Kinglake Estate  
 Kinglake Street  
 Flat 22A Faversham House Kinglake  
 Estate Kinglake Street  
 Ground Floor Flat 87 Mina Road London  
 112 Albany Road London Southwark  
 Flat 28 Emberton 190 Albany Road  
 23 Winslow Kinglake Street London  
 Street Record Bagshot Street London  
 Flat 8 Tenterden House Kinglake Estate  
 Kinglake Street

Southborough House Kinglake Estate  
Kinglake Street London

Tenterden House Kinglake Estate  
Kinglake Street London

Flat D 80-84 Smyrks Road London

Flat C 80-84 Smyrks Road London

Flat F 80-84 Smyrks Road London

Flat G 80-84 Smyrks Road London

Flat A 80-84 Smyrks Road London

23A Bagshot Street London Southwark

134 Wendover Thurlow Street London

255A Wendover Thurlow Street London

141 Wendover Thurlow Street London

206 Wendover Thurlow Street London

390 Wendover Thurlow Street London

Flat 8 Emberton 190 Albany Road

Flat 6 Emberton 190 Albany Road

15 Bagshot Street London Southwark

97 Mina Road London Southwark

31 Bagshot Street London Southwark

86 Mina Road London Southwark

23 Bagshot Street London Southwark

93 Mina Road London Southwark

90 Mina Road London Southwark

87 Latimer Beaconsfield Road London

First Floor Flat 87 Mina Road London

95 Latimer Beaconsfield Road London

Ivychurch House Kinglake Street London

Microcell Gln7351 Bagshot Street  
London

First Floor 29 Bagshot Street London

First Floor 31 Bagshot Street London

Street Record Mina Road London

419 Wendover Thurlow Street London

Flat 5 Tenterden House Kinglake Estate  
Kinglake Street

Flat 5 Southborough House Kinglake  
Estate Kinglake Street

90 Smyrks Road London Southwark

Flat 26 Bethersden House Kinglake  
Estate Kinglake Street

252A Wendover Thurlow Street London

4 Padbury Bagshot Street London

123 Wendover Thurlow Street London

Flat 6 Bethersden House Kinglake  
Estate Kinglake Street

20 Winslow Kinglake Street London

98 Albany Road London Southwark

54 Ravenstone Bagshot Street London

39 Ravenstone Bagshot Street London

Flat 36 Keston House Kinglake Estate  
Kinglake Street

36 Latimer Beaconsfield Road London

307 Wendover Thurlow Street London

Flat 3 Faversham House Kinglake Estate  
Kinglake Street

392 Wendover Thurlow Street London

424 Wendover Thurlow Street London

Flat 39 Keston House Kinglake Estate  
Kinglake Street

Flat 4 Tenterden House Kinglake Estate  
Kinglake Street

Flat 29 Keston House Kinglake Estate  
Kinglake Street

Flat 18 Keston House Kinglake Estate  
Kinglake Street

Flat 30 Southborough House Kinglake Estate Kinglake Street  
 35A Bagshot Street London Southwark  
 408 Wendover Thurlow Street London  
 402 Wendover Thurlow Street London  
 399 Wendover Thurlow Street London  
 387 Wendover Thurlow Street London  
 373 Wendover Thurlow Street London  
 131 Wendover Thurlow Street London  
 Flat 8 47-53 Bagshot Street London  
 Flat 2 47-53 Bagshot Street London  
 Flat 5 47-53 Bagshot Street London  
 Faversham House Kinglake Estate Kinglake Street London  
 223 Wendover Thurlow Street London  
 Domville Court 70 Bagshot Street London  
 Transformer Chamber Bagshot Street London  
 Flat 2 37 Bagshot Street London  
 Flat 3 37 Bagshot Street London  
 130 Wendover Thurlow Street London  
 142 Wendover Thurlow Street London  
 213 Wendover Thurlow Street London  
 Flat H 80-84 Smyrks Road London  
 338 Wendover Thurlow Street London  
 Flat 5 109 Kinglake Street London  
 89 Mina Road London Southwark  
 120 Latimer Beaconsfield Road London  
 Flat 27 Faversham House Kinglake Estate Kinglake Street  
 388 Wendover Thurlow Street London  
 44 Latimer Beaconsfield Road London  
 173 Wolverton Alvey Street London  
 Flat B 80-84 Smyrks Road London  
 16 Padbury Bagshot Street London  
 69 Ravenstone Bagshot Street London  
 Flat 11 Southborough House Kinglake Estate Kinglake Street  
 Flat 1 47-53 Bagshot Street London  
 458 Wendover Thurlow Street London  
 326 Wendover Thurlow Street London  
 442 Wendover Thurlow Street London  
 411 Wendover Thurlow Street London  
 Flat 32 Keston House Kinglake Estate Kinglake Street  
 Flat 26 Keston House Kinglake Estate Kinglake Street  
 Flat 16 Tenterden House Kinglake Estate Kinglake Street  
 Flat 11 Tenterden House Kinglake Estate Kinglake Street  
 Flat 14 Southborough House Kinglake Estate Kinglake Street  
 Flat 12 Southborough House Kinglake Estate Kinglake Street  
 354 Wendover Thurlow Street London  
 144 Wendover Thurlow Street London  
 Flat 18 Faversham House Kinglake Estate Kinglake Street  
 257 Wendover Thurlow Street London  
 252 Wendover Thurlow Street London  
 243 Wendover Thurlow Street London  
 471 Wendover Thurlow Street London  
 130 Latimer Beaconsfield Road London

164 Wolverton Alvey Street London  
 19 Winslow Kinglake Street London  
 24 Padbury Bagshot Street London  
 96 Albany Road London Southwark  
 73 Mina Road London Southwark  
 10 Padbury Bagshot Street London  
 73 Ravenstone Bagshot Street London  
 71 Ravenstone Bagshot Street London  
 63 Ravenstone Bagshot Street London  
 320 Wendover Thurlow Street London  
 Flat 29 Southborough House Kinglake  
 Estate Kinglake Street  
 135 Wendover Thurlow Street London  
 209 Wendover Thurlow Street London  
 Flat 1 Keston House Kinglake Estate  
 Kinglake Street  
 393 Wendover Thurlow Street London  
 Flat 9 Bethersden House Kinglake  
 Estate Kinglake Street  
 Flat 4 Bethersden House Kinglake  
 Estate Kinglake Street  
 Flat 13 Bethersden House Kinglake  
 Estate Kinglake Street  
 34 Ravenstone Bagshot Street London  
 23 Ravenstone Bagshot Street London  
 Flat 28 Faversham House Kinglake  
 Estate Kinglake Street  
 Flat 23 Faversham House Kinglake  
 Estate Kinglake Street  
 Flat 50 Keston House Kinglake Estate  
 Kinglake Street  
 43 Ravenstone Bagshot Street London  
 345 Wendover Thurlow Street London  
 56 Latimer Beaconsfield Road London  
 Flat 14 Emberton 190 Albany Road  
 297 Wendover Thurlow Street London  
 294 Wendover Thurlow Street London  
 291 Wendover Thurlow Street London  
 232 Wendover Thurlow Street London  
 153 Wendover Thurlow Street London  
 249 Wendover Thurlow Street London  
 254 Wendover Thurlow Street London  
 468 Wendover Thurlow Street London  
 45 Ravenstone Bagshot Street London  
 4 Ravenstone Bagshot Street London  
 37 Ravenstone Bagshot Street London  
 Flat 6 Keston House Kinglake Estate  
 Kinglake Street  
 32 Latimer Beaconsfield Road London  
 24 Winslow Kinglake Street London  
 Flat 3 Emberton 190 Albany Road  
 Flat 17 Emberton 190 Albany Road  
 115 Latimer Beaconsfield Road London  
 45 Latimer Beaconsfield Road London  
 66 Ravenstone Bagshot Street London  
 55 Ravenstone Bagshot Street London  
 314 Wendover Thurlow Street London  
 311 Wendover Thurlow Street London  
 Flat 46 Keston House Kinglake Estate  
 Kinglake Street  
 Flat 42 Keston House Kinglake Estate  
 Kinglake Street  
 Flat 15 Keston House Kinglake Estate  
 Kinglake Street

Flat 26 Southborough House Kinglake Estate Kinglake Street

Flat 20 Bethersden House Kinglake Estate Kinglake Street

Flat 2 Bethersden House Kinglake Estate Kinglake Street

Flat 12 Bethersden House Kinglake Estate Kinglake Street

Flat 17 Faversham House Kinglake Estate Kinglake Street

Flat 16 Faversham House Kinglake Estate Kinglake Street

200 Albany Road London Southwark

90 Albany Road London Southwark

114 Albany Road London Southwark

Flat 23 Emberton 190 Albany Road

Flat 15 Emberton 190 Albany Road

Flat 12 Emberton 190 Albany Road

298 Wendover Thurlow Street London

216 Wendover Thurlow Street London

94 Latimer Beaconsfield Road London

211 Wendover Thurlow Street London

205 Wendover Thurlow Street London

132 Wendover Thurlow Street London

30 Winslow Kinglake Street London

171 Wolverton Alvey Street London

169 Wolverton Alvey Street London

166 Wolverton Alvey Street London

470 Wendover Thurlow Street London

463 Wendover Thurlow Street London

432 Wendover Thurlow Street London

447 Wendover Thurlow Street London

428 Wendover Thurlow Street London

Flat 6 Domville Court 70 Bagshot Street

265 Wendover Thurlow Street London

202 Albany Road London Southwark

323 Wendover Thurlow Street London

Flat 1 37 Bagshot Street London

Flat 25 Southborough House Kinglake Estate Kinglake Street

Flat 4 Keston House Kinglake Estate Kinglake Street

Flat 21 Keston House Kinglake Estate Kinglake Street

Flat 9 Southborough House Kinglake Estate Kinglake Street

Flat 29 Bethersden House Kinglake Estate Kinglake Street

Flat 27 Bethersden House Kinglake Estate Kinglake Street

Flat 14 Bethersden House Kinglake Estate Kinglake Street

Flat 8 Faversham House Kinglake Estate Kinglake Street

Flat 5 Faversham House Kinglake Estate Kinglake Street

Flat 24 Faversham House Kinglake Estate Kinglake Street

Flat 22 Faversham House Kinglake Estate Kinglake Street

Flat 19 Faversham House Kinglake Estate Kinglake Street

94 Albany Road London Southwark

92 Albany Road London Southwark

106 Albany Road London Southwark

Flat 20 Emberton 190 Albany Road

299 Wendover Thurlow Street London

287 Wendover Thurlow Street London

270 Wendover Thurlow Street London	253A Wendover Thurlow Street London
264 Wendover Thurlow Street London	236 Wendover Thurlow Street London
261 Wendover Thurlow Street London	155 Wendover Thurlow Street London
260 Wendover Thurlow Street London	152 Wendover Thurlow Street London
204 Wendover Thurlow Street London	143 Wendover Thurlow Street London
201 Wendover Thurlow Street London	177 Wolverton Alvey Street London
133 Wendover Thurlow Street London	100A Smyrks Road London Southwark
29 Winslow Kinglake Street London	29 Bagshot Street London Southwark
28 Winslow Kinglake Street London	94 Mina Road London Southwark
18 Winslow Kinglake Street London	92 Mina Road London Southwark
253 Wendover Thurlow Street London	84 Mina Road London Southwark
251 Wendover Thurlow Street London	Flat 2 25 Bagshot Street London
466 Wendover Thurlow Street London	Flat 2 Domville Court 70 Bagshot Street
441 Wendover Thurlow Street London	Flat 12 Domville Court 70 Bagshot Street
125 Latimer Beaconsfield Road London	38 Latimer Beaconsfield Road London
101 Mina Road London Southwark	Flat E 80-84 Smyrks Road London
13 Winslow Kinglake Street London	135 Latimer Beaconsfield Road London
57 Latimer Beaconsfield Road London	19 Padbury Bagshot Street London
47 Latimer Beaconsfield Road London	Flat 27 Emberton 190 Albany Road
10 Winslow Kinglake Street London	88 Albany Road London Southwark
62 Ravenstone Bagshot Street London	108 Albany Road London Southwark
409 Wendover Thurlow Street London	182 Wolverton Alvey Street London
407 Wendover Thurlow Street London	Flat 11 Emberton 190 Albany Road
394 Wendover Thurlow Street London	176 Wolverton Alvey Street London
43 Latimer Beaconsfield Road London	271 Wendover Thurlow Street London
52 Ravenstone Bagshot Street London	53 Ravenstone Bagshot Street London
5 Ravenstone Bagshot Street London	305 Wendover Thurlow Street London
38 Ravenstone Bagshot Street London	Flat 11 109 Kinglake Street London
221 Wendover Thurlow Street London	Flat 3 109 Kinglake Street London
33 Ravenstone Bagshot Street London	Flat 34 Keston House Kinglake Estate Kinglake Street

Flat 28 Keston House Kinglake Estate  
Kinglake Street

Flat 25 Keston House Kinglake Estate  
Kinglake Street

Flat 17 Keston House Kinglake Estate  
Kinglake Street

Flat 23 Keston House Kinglake Estate  
Kinglake Street

Flat 20 Keston House Kinglake Estate  
Kinglake Street

80-84 Smyrks Road London Southwark

Flat 7 Bethersden House Kinglake  
Estate Kinglake Street

Flat 9 Tenterden House Kinglake Estate  
Kinglake Street

Flat 4 Southborough House Kinglake  
Estate Kinglake Street

Flat 28 Southborough House Kinglake  
Estate Kinglake Street

Flat 18 Bethersden House Kinglake  
Estate Kinglake Street

Flat 14 Faversham House Kinglake  
Estate Kinglake Street

Flat 4 Emberton 190 Albany Road

293 Wendover Thurlow Street London

282 Wendover Thurlow Street London

281 Wendover Thurlow Street London

217 Wendover Thurlow Street London

### **Re-consultation:**

## Consultation responses received

### Internal services

LBS Ecology

LBS Archaeology

LBS Community Infrastructure Levy Team

LBS Design & Conservation Team [Formal]

LBS Ecology

LBS Planning Policy

LBS Transport Policy

LBS Urban Forester

LBS Archaeology

LBS Community Infrastructure Levy Team

LBS Design & Conservation Team [Formal]

LBS Ecology

LBS Environmental Protection

LBS Transport Policy

LBS Urban Forester

### Statutory and non-statutory organisations

Metropolitan Police Service

Transport for London

Thames Water

Environment Agency

Metropolitan Police Service

Thames Water

### Neighbour and local groups consulted:

46 Comber House Comber Grove London	8 Parade Mansions 114 Coldharbour Lane London
17 Hoptons Gardens Hopton Street London	12b Therapia Road London SE229SE
196 Trafalgar Street Walworth London	30 Oakwood Drive, Gipsy Hill, London, Flat 19, Willett House 50 Landor Road London
99 Wells Way London SE57SZ	London SE5 8DL
97 Mina Road London SE17 2QS	9 Bellcroft Birmingham B16 8EJ Birmingham B16 8EJ
36 Langley Court Bradenham Close London	Flat 60 Dawes House Orb Street London
12 Chestnut Close London SW16 2SH	38 Hibernia Point Wolvercote Rd London
7 Pelinore Road London SE6 1RP	17 Crieff Road London SW18 2EB
25 Burton Grove London SE17 2NT	3, Bellcroft Birmingham B16 8EJ
Flat 34E Sir Christopher France House Westfield Way Mile End	119 Dorset Road Wimbledon SW19 3EQ
10 Hector Court Caldwell Street London	28 Clay avenue Mitcham CR4 1BS
22 Lordship Park London	Flat 25 Ivy Point 5 Hannaford Walk London
171 Salmon Street London	29 Innis House East Street London
131C Kilburn Park Road London NW6 5LD	7 White House Lane Perranzabuloe Truro
Flat 212 Astra House 23-25 Arklow Road London	c/o Chumleigh Gardens London
24 Pullens London	Flat 149, Taplow Thurlow Street London
Flat 63, 41 Maltby Street London SE1 3FF	5 Downton Avenue London SW2 3TU
30 Oakwood Drive, Gipsy Hill, London, Keyham House Westbourne Park Road London	19 BASSETT ST LONDON NW5 4PG
Pelinore rd London Se61rp	36 Langley Court 1 Bradenham Close London
Thistledown Barn Newham Helston TR13 0SA	23 Dearmer Hse Tulse Hill Estate London
42A Totteridge Common London N20 8ND	14 Chadwick rd London SE154RA
283 Rosendale Road London SE24 9EJ	22 Purser House Tulse Hill London
68 Purser House Tulse Hill London	Keston House Flat 49 London
	94 MINA ROAD LONDON SE17 2QS
	37 Bagshot Street Flat 1 London

Flat 13 Ravenstone Bagshot street  
london

104 Albany Road London Se5 0da

97 Mina Road London Southwark

43 South City Court London SE15 6FR

Flat 13, 1c Bethwin Road, SE5 0SG

9b Vicarage Grove, London SE57LW

38 Kitson road London SE5 7LF

52 Surrey square London Se172jx

8 April Glen, Mayow Road SE23 2XP

East Street 29 Innis House East Street

69 Coleman Road London

50 Surrey Sq London SE17 2JX

21 Probert Road Brixton London

73 Disraeli Close London SE28 8AW

87 Balfour street London SE17 1PB

