Open Agenda

# Planning Committee (Major Applications) A

Wednesday 2 July 2025
6.30 pm
Ground Floor Meeting Room G02 – 160 Tooley Street, London SE1 2QH

**Membership**

Councillor Richard Livingstone (Chair)
Councillor Kath Whittam (Vice-Chair)
Councillor 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

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**INFORMATION FOR MEMBERS OF THE PUBLIC**

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**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**

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**Access**

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

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Members of the committee are summoned to attend this meeting
**Althea Loderick**
Chief Executive
Date: 24 June 2025

PRINTED ON RECYCLED PAPER

# Planning Committee (Major Applications) A

Wednesday 2 July 2025
6.30 pm
Ground Floor Meeting Room G02 – 160 Tooley Street, London SE1 2QH

## Order of Business

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**1. APOLOGIES**

To receive any apologies for absence.

**2. CONFIRMATION OF VOTING MEMBERS**

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

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

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

**4. DISCLOSURE OF INTERESTS AND DISPENSATIONS**

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

**5. MINUTES** 1 - 4

To approve as a correct record the minutes of the meeting held on 4 June 2025.

**6. TO RELEASE £118,394.60 FROM SECTION 106 AGREEMENTS TO DELIVER ROCKINGHAM STREET AND ARCH STREET IMPROVEMENTS** 5 - 12

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| 9.3. | **CHAMBERS WHARF, CHAMBERS STREET, LONDON, SE16 4XQ [24/AP/3801 - S73 MATERIAL AMENDMENT]** | 287 - 405 |


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

**EXCLUSION OF PRESS AND PUBLIC**

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

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

Date: 24 June 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 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

Agenda Item 5

# Planning Committee (Major Applications) A

MINUTES of the Planning Committee (Major Applications) A held on Wednesday 4 June 2025 at 6.30 pm at Ground Floor Meeting Room G02 - 160 Tooley Street, London SE1 2Q

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| | |
|---|---|
| **PRESENT:** | Councillor Richard Livingstone (Chair)<br>Councillor Kath Whittam (Vice-Chair)<br>Councillor Gavin Edwards<br>Councillor Darren Merrill<br>Councillor Reginald Popoola<br>Councillor Catherine Rose<br>Councillor Emily Tester |
| **OTHER MEMBERS PRESENT:** | Councillor Ketzia Harper (Ward member) |
| **OFFICER SUPPORT:** | Colin Wilson (Assistant Director Strategic Development)<br>Claire Nevin (External Legal Counsel, FTB Chambers)<br>Dipesh Patel (Head of Planning, Strategic Applications)<br>Michael Tsoukaris (Manager Design and Conservation)<br>Alex Cameron (Planning Team Leader)<br>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 members' pack and addendum report which had been circulated before the meeting.

## 4. DISCLOSURE OF INTERESTS AND DISPENSATIONS

There were none.

## 5. MINUTES

The committee considered the draft minutes.

**RESOLVED:**

That the minutes for the Planning Committee (Major Applications) A meeting held on 29 April 2025 be approved as a correct record and signed by the chair.

## 6. 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.

## 6.1 AYLESBURY ESTATE SITE PHASE 2B - LAND BOUNDED BY THURLOW STREET, ALBANY ROAD, KINGLAKE STREET AND BAGSHOT STREET

**Planning Application Number:** 22/AP/2226

**Report:** see pages 13 to 166 of the agenda pack and pages 1 to 4 of the addendum report

**PROPOSAL:**

*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, from the scheme that the Committee were previously minded to approve on 17January 2023, 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 committee heard the officers' introduction to the report and addendum report. Members put questions to officers.

The spokespersons for the objectors addressed the committee and responded to questions put by members of the committee.

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

Following this, the meeting adjourned for a comfort break from 8:14pm to 8:21pm.

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

Councillor Ketzia Harper addressed the committee in her capacity as a ward

councillor and responded to questions put by members of the committee.

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

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

**RESOLVED:**

1. That planning permission be granted subject to the conditions set out in the report, 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 the report.

The meeting ended at 9.22 pm.

**CHAIR:**

**DATED:**

Agenda Item 6

| | |
|---|---|
| **Meeting Name:** | Planning Committee (Major Applications) A |
| **Date:** | 2 July 2025 |
| **Report title:** | To release £118,394.60 from Section 106 agreements to deliver Rockingham Street and Arch Street Improvements |
| **Ward(s) or groups affected:** | Chaucer |
| **Classification:** | Open |
| **Reason for lateness (if applicable):** | N/A |
| **From:** | Director of Planning and Growth |

## RECOMMENDATION

1. That the Planning Committee (Major Applications) A approves the release of the funds amounting to £118,394.60, which were received by the council (pursuant to the terms of the legal agreement pertaining to the planning applications noted in Table 1, below) and are to be applied towards the Rockingham Street and Arch Street improvements of the public realm.

Table 1 - Summary of Requested Funding.

| Planning application Reference | Profit Centre | Spend Category | Address | Indexation amount | Amount |
|---|---|---|---|---|---|
| 09/AP/0343 | W07005 | Communities Facilities | Eileen House, 80-94 Newington Causeway, SE1 6EF | £2,394.60 | £118,394.60 |
| **Total** | | | | | **£118,394.60** |

## BACKGROUND INFORMATION

2. Planning obligations are the legal obligations secured for the purposes of mitigating the impacts of a development proposal and can contribute to providing the infrastructure and facilities necessary to achieve sustainable communities. These obligations are secured in legal agreements (often referred to as, section 106 agreements), which are entered into by parties with proprietorial interests in the development site to which they relate. This is to ensure that they bind the owners of the site including the developers (should they have or subsequently acquire such interests). Moreover, planning obligations can take the form of a variety of different things including the requirement to pay (to the council) financial contributions.

3. In addition, the Community Infrastructure Levy (CIL) regime allows local planning authorities, like the council, the ability to levy a charge for new developments (above a certain size and type). The purpose of which is to raise funds to contribute towards the infrastructure needed to support the development of the area.

4. The council's S106 and CIL Supplementary Planning Document (SPD) 2015 (updated November 2020) provides detailed guidance on the council's use of planning obligations and CIL. On 6 March 2024, the Cabinet resolved that the new Section 106 (S106) and Community Infrastructure Levy (CIL) Supplementary Planning Document (SPD) be approved for consultation. This consultation concluded on 27 November 2024.

5. The Rockingham Street and Arch Street public realm improvements have been identified as meeting the requirements of the S106 monies from the above planning application scheme for public realm improvements within the Chaucer ward.

6. The monies will be allocated towards a new project, which involves resurfacing the existing footway/carriageway and installing streetlights along the pedestrian strip known as Rockingham Road (spanning from New Kent Road to Rockingham Road).

7. Rockingham Street and Arch Street are located within the Chaucer ward. The section of Rockingham Street improvements area flanks the rail arches. Arch Street is perpendicular to that section of Rockingham. See Appendix 1 for the site plan.

8. Rockingham Street and Arch Street are frequently used pedestrian routes for residents and visitors to access Elephant Castle National Rail Station, Elephant Park and the Latin American community within the arches. The current conditions of the roads are poor; there are several potholes, and they are unsafe.
9. This project is part of a wider strategy aimed at enhancing the local vicinity. It includes refurbishing the arches and revitalising Latin American and African businesses. The route will provide direct access into the new Elephant and Castle town centre upon its opening in 2026, anticipating increased footfall.
10. These works are intended to complement Delancy's developments for the new Elephant and Castle Town Centre.

**Consultation**

11. No consultation is required in relation to this report recommendation.

12. Consultation will be undertaken as part of the design development process.

**KEY ISSUES FOR CONSIDERATION**

13. The council is in receipt of S106 monies amounting to £118,394.60, which were secured under Section 106 of the Town and Country Planning Act 1990. These monies are for funding towards the improvement of Newington Gardens Dickens Square Park, Rockingham Community Centre, Rockingham Estate open space and Scovell Estate improvements or in

such other way as the Council deems appropriate to mitigate the impact of the Development on the public realm within 500 m of the Site.

14. This project meets the requirements of that funding, being the improvement works to Rockingham and Arch Street, which are located within the Chaucer ward. The project will comprise;
    - Enhancing the pathway to improve both walking and vehicular experience.
    - Installation of new streetlights to ensure safety throughout the day and night.

15. The works will be comprehensive, and the total amount needed is anticipated to be circa £400,000 - £500,000. Securing these funds is necessary to begin to build the total funding envelope, the remainder of which will be sought from local CIL and other grant sources.

**Policy framework implications**

16. The project aligns with the pledges and objectives set out in The Streets for People Strategy 2030:

    - Pledge: 'Your street will have improvements to make it leaner, greener, and safer, chosen by you'—if the road is not managed by us (Arch Street), we will work with the respective landowners to deliver this pledge.
    - Objective 2: Create good quality space that is accessible for all people.
    - Objective 4: Improve safety and security for everyone using our streets.
    - Objective 5: Making walking, cycling and wheeling easier.
    - Objective 8: Increase footfall and dwelling time in town centres by making them a nice place to be and easy to get to.

17. Southwark Plan 2022 policies related to this project include the Area Vision for Elephant and Castle (AV.09) and the strategic policies SP2 Southwark Together (P13 Design of places, P14 Design quality, and P16 Designing out crime), SP4 A green and inclusive economy (P34 Railway arches), and SP5 Thriving neighbourhoods and tackling health inequalities (P51 Walking and P52 Low Line routes).

18. The council's Delivery Plan 2022-2026, A healthy environment policy, outlines the objective of 'creating safe, healthy, green streets' and the Keeping you safe policy with the objective of 'upgrading street and estate lighting,' which will be an outcome of this project.

19. Southwark 2030 sets out the council's corporate policy, which will be reflected in the project outcome, this includes; A Safer Southwark and A Healthy Environment.

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

### Community impact statement

20. There is no community impact in relation to this report recommendation.

21. The project will have a positive community impact in providing a better environment for walking and create a positive economic impact on the local businesses residing in the Rockingham Street arches, leading all the way to the new town centre.

### Equalities (including socio-economic) impact statement

22. The Public Sector Equality Duty is set out in section 149 of the Equality Act 2010, which requires the council to have due regard to the need to:

    - eliminate discrimination, harassment and victimisation;
    - advance equality of opportunity between persons who share a relevant protected characteristic and those who do not;
    - foster good relations between persons who share a relevant protected characteristic and those who do not.

23. The Public Sector Equality Duty requires public bodies to consider those with protected characteristics (which includes age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation) when carrying out their day-to-day work, in shaping policy and delivering services. It applies to every aspect of local government decision making.

24. It is not considered that the proposal has any negative impact on any particular people with protected characteristics.

### Health impact statement

25. There is no health impact related to the recommendations of this report.

26. The project outcomes will deliver health benefits by improving the walking route, which will encourage people to be more active. The pathway will provide a safe route for both pedestrians and cyclists, as well as wheelchair users and mobility scooter users.

### Climate change implications

27. There are no climate change implications related to the recommendations of this report.

28. The project outcomes will address the council's Climate Change Strategy, Priority 2 Active and Sustainable Travel, by improving the streets to encourage the project outcomes will address the council's Climate Change Strategy, Priority 2 Active and Sustainable Travel, by improving the streets to encourage sustainable travel and improving a link to public transport from the town centre.

**Resource implications**

29. All staff resourcing implications and the project managing will be contained within the existing resources of the Sustainable Growth North team.

**Financial implications**

30. The total estimated cost for delivering the wider works for re-paving and installing additional streetlights is £400,000 – 500,000. Securing the £118,394.60 from this S106 allocation is the start of securing further monies, which may be drawn from local CIL or other developer contributions.

31. Once this report is approved, a new capital cost code will be created for the "Rockingham Street and Arch Street Improvements" in the Planning & Growth capital programme, and with the appropriate budget.

**SUPPLEMENTARY ADVICE FROM OTHER OFFICERS**

**Director of Planning and Growth**

32. The proposed allocation accords with the agreements itemised in paragraph 1 and would provide appropriate mitigation for the impacts of the specific and future developments.

**Assistant Chief Executive – Governance and Assurance**

33. The council's constitution provides that it is the function of planning committee (major applications) to, amongst other things, consider the expenditure of funds over £100,000 of strategic importance secured through legal agreements under section 106 of the Town and Country Planning Act 1990.

34. The Equality Act 2010 introduced the public sector equality duty, which requires public authorities to have due regard to certain equality considerations when exercising their functions, like making decisions. It ensures that those organisations consider how their functions will affect people with different protected characteristics. The relevant protected characteristics are: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, marriage and civil partnership. In summary those subject to the equality duty, which includes the council, must in the exercise of their functions: (i) have due regard to the need to eliminate unlawful discrimination, harassment and victimization; and (ii) foster good relations between people who share a protected characteristic and those who do not. The report considers equalities issues, and the report confirms the proposals are not expected to have a detrimental impact on any protected group under the Equality Act 2010.

35. The Human Rights Act 1998 imposed a duty on the Council as a public authority to apply the European Convention on Human Rights; as a result, the council must not act in a way which is incompatible with these rights. The

most important rights for planning purposes are Article 8 (respect for homes); Article 6 (natural justice) and Article 1 of the First Protocol (peaceful enjoyment of property). The proposals are not expected to breach any of the provisions of the Human Rights Act 1998.

36. Council Assembly on 14 July 2021 approved a change to the council's Constitution to confirm that all decisions made by the council will consider the climate and equality (including socio-economic disadvantage and health inequality) consequences of taking that decision. This has been considered at paragraph 22-28 above.

**Strategic Director of Resources**

37. This report seeks approval to release £118,394.60 from the Section 106 agreements for Rockingham Street and Arch Street Improvements to Public Realm as outlined in this report.

38. The Strategic Director of Resources notes the resource implications in paragraph 29 and the supplementary advice from the Director of Planning and Growth and Assistant Chief Executive – Governance and Assurance and confirms that the Council has received the related funds and that they are available for the purposes outlined in this report.

## BACKGROUND DOCUMENTS

| Background Papers | Held At | Contact |
|---|---|---|
| None | | |

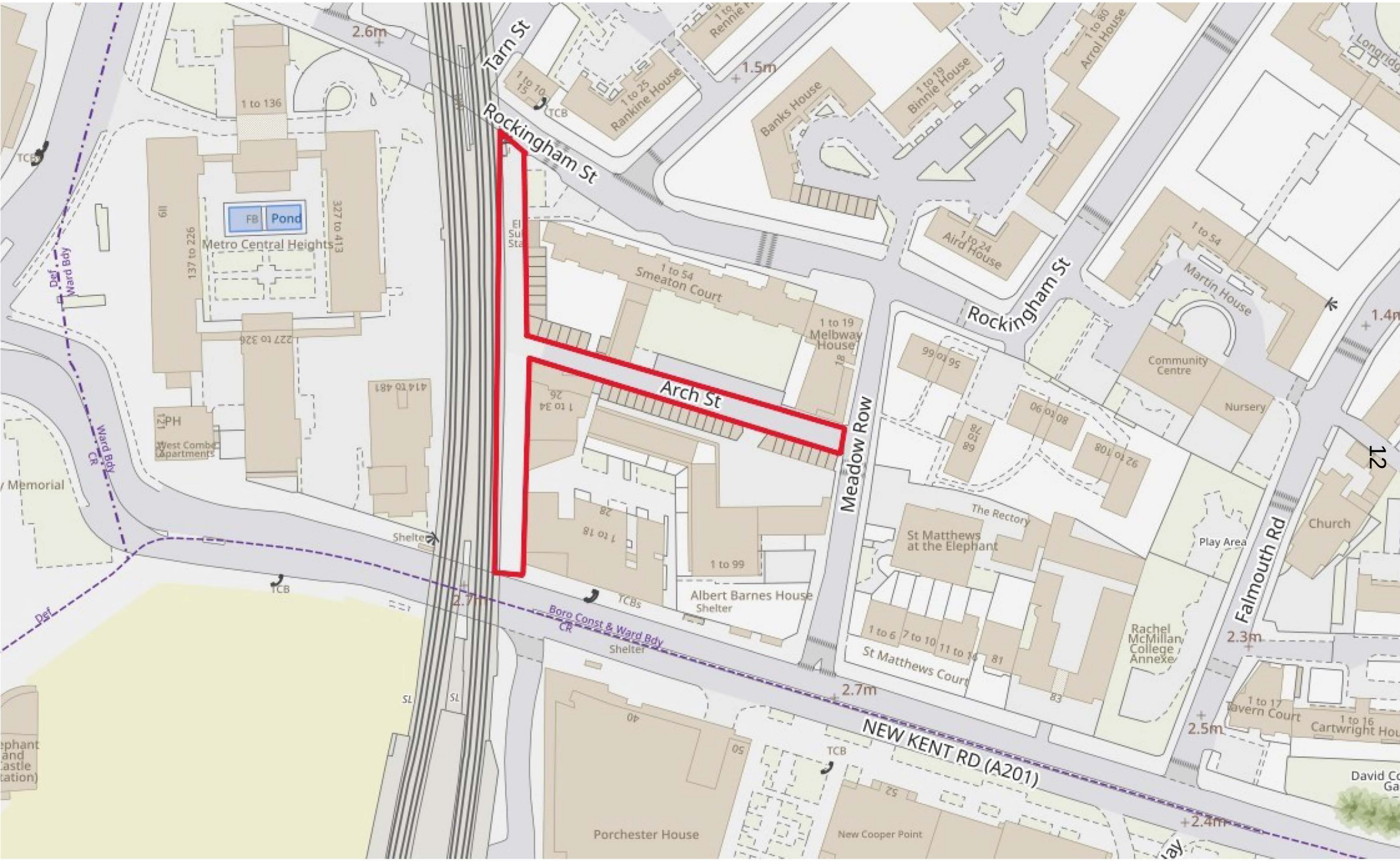
## APPENDICES

| No. | Title |
|---|---|
| Appendix 1 | Rockingham and Arch Street Site Plan |

**AUDIT TRAIL**

| | | |
|---|---|---|
| **Lead Officer** | Stephen Platts, Director of Planning and Growth | |
| **Report Author** | Uzma Aynar, Project Manager, Sustainable Growth North | |
| **Version** | Final | |
| **Dated** | 29 May 2025 | |
| **Key Decision?** | No | |
| **CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBERS** | | |
| **Officer Title** | **Comments Sought** | **Comments Included** |
| Assistant Chief Executive – Governance and Assurance | Yes | Yes |
| Strategic Director of Resources | Yes | Yes |
| Director of Planning and Growth | Yes | Yes |
| **Cabinet Member** | No | No |
| **Date final report sent to Constitutional Team** | | 18 June 2025 |

**APPENDIX 1**


Tarn St
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NEW KENT RD (A201)
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Pond
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227 to 326
327 to 413
414 to 481
West Combe Apartments
1 to 54 Smeaton Court
1 to 19 Melbway House
1 to 34
1 to 18
1 to 99
Albert Barnes House
Shelter
TCBs
TCB
Rankine House
Banks House
Binnie House
Aird House
Arrol House
Martin House
Community Centre
Nursery
Play Area
Church
The Rectory
St Matthews at the Elephant
St Matthews Court
Rachel McMillan College Annexe
Tavern Court
Cartwright House
Porchester House
New Cooper Point
Boro Const & Ward Bdy
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Agenda Item 7

| | |
|---|---|
| **Meeting Name:** | Planning Committee (Major Applications) A |
| **Date:** | 2 July 2025 |
| **Report title:** | To release £200,000 from Section 106 agreements for the consultant services for Asylum Road Nursing Home delivery |
| **Ward(s) or groups affected:** | Nunhead and Queens Road |
| **Classification:** | Open |
| **Reason for lateness (if applicable):** | N/A |
| **From:** | Director of Planning and Growth |

## RECOMMENDATION

1. That the Planning Committee (Major Applications) A approves the release of the funds amounting to £200,000.00, which were received by the council (pursuant to the terms of the legal agreements pertaining to the planning applications noted in Table 1, below) and are to be applied towards consultancy services to lead a market-led development opportunity for a new nursing home at Asylum Road.

Table 1 - Summary of Requested Funding.

| Planning application Reference | Profit Centre | Spend Category | Address | Indexation amount | Amount |
|---|---|---|---|---|---|
| 14/AP/2000 | W08365 | Health Contribution | Site bounded by Sumner Road, Daniel Gardens and Garnies Close SE15 | £16,453.00 | £147,062.08 |
| 12/AP/3558 | W06785 | Health Contribution | 90-91 and 92 Blackfriars Road, SE1 8HW | £0.00 | £42,937.92 |
| **Total** | | | | **£16,453.00** | **£200,000.00** |

## BACKGROUND INFORMATION

2. Planning obligations are the legal obligations secured for the purposes of mitigating the impacts of a development proposal and can contribute to providing the infrastructure and facilities necessary to achieve

sustainable communities. These obligations are secured in legal agreements (often referred to as, section 106 agreements), which are entered into by parties with proprietorial interests in the development site to which they relate. This is to ensure that they bind the owners of the site including the developers (should they have or subsequently acquire such interests). Moreover, planning obligations can take the form of a variety of different things including the requirement to pay (to the council) financial contributions.

3. In addition, the Community Infrastructure Levy (CIL) regime allows local planning authorities, like the council, the ability to levy a charge for new developments (above a certain size and type). The purpose of which is to raise funds to contribute towards the infrastructure needed to support the development of the area.

4. The council's S106 and CIL Supplementary Planning Document (SPD) 2015 (updated November 2020) provides detailed guidance on the council's use of planning obligations and CIL. On 6 March 2024, the Cabinet resolved that the new Section 106 (S106) and Community Infrastructure Levy (CIL) Supplementary Planning Document (SPD) be approved for consultation. This consultation concluded on 27 November 2024.

5. This report relates the aggregated Health S106 funds applicable to this site, which have been accrued from two consents, each contributing a proportionate amount of monies, and currently totalling £219,736.26 (see table 2 below).

Table 2 – Available Health Contributions applicable to Asylum Road Nursing Home

| Planning application Reference | Profit Centre | Spend Category | Address | Indexation Amount | Amount |
|---|---|---|---|---|---|
| 14/AP/2000 | W08365 | Health Contribution | Site bounded by Sumner Road, Daniel Gardens and Garnies Close SE15 | £16,453.00 | £147,062.08 |
| 12/AP/3558 | W06785 | Health Contribution | 90-91 and 92 Blackfriars Road, SE1 8HW | £12,843.18 | £72,674.18 |
| **Total** | | | | **£29,296.18** | **£219,736.26** |

6. This report seeks the allocation of £200,000.00 for specialist consultant services to lead and manage a market-led development opportunity for a new nursing home at 128 – 148 Asylum Road. As this relates to a new nursing home, it is appropriate to use these funds for this purpose.

7. The specialist consultant, Jones Lang LaSelle, selection through the Crown Commercial Service framework for their quality of work and specialist knowledge and appointed as a single supplier direct award.

8. Nursing home care provides 24/7 nursing support to elderly people with the relevant care needs, including accommodation and nursing care for dementia needs.

9. Justification of the new nursing home is set out in IDM report, dated 16 April 2024, which identified the Asylum Road as a suitable site for a new nursing home. (see background papers). Further justification is set out in a Nursing Care Needs Analysis undertaken by ASC in August 2024, which identified that the need for nursing home care continues to grow in the borough.

10. Should the committee resolve to approve the recommendation (as set out in paragraph 1 above), these sums shall be released to the Department of Sustainable Growth portfolio holder, to be applied towards the appointment of the specialist consultant.

## CONSULTATION

11. In March 2024, a community engagement event was held, during which the council discussed its consideration of using the site for a new nursing home. The proposals were met with a positive response. Once the planning process is underway, further consultation will be held regarding it.

## KEY ISSUES FOR CONSIDERATION

12. The allocation of the Health S106 monies sought will be used for specialist consultant services to lead and manage through the completion of the process of taking to the market a development opportunity for a new nursing home located at 128 – 148 Asylum Road. The consultant services will comprise all stages from launching the bid opportunity, including preparing the marketing brochure to a long list of bidders, facilitating the shortlisting and selection process with the council's steering group, and managing the planning process. The fee for these services is £150,000, payable upon successfully completing specified milestones.

13. The allocation of the Health S106 monies sought will also be used to cover some additional associated costs and contingency costs, identified in aggregate as £50,000.00. These include: production of the marketing brochure, including photography, and site surveys.

### Policy framework implications

14. Through documents resulting from the Joint Strategic Needs Assessment 2024 (JSNA), specifically the annual report, Dementia prevention in Southwark, and the Older people's profile, the Council has recognised the impact of dementia as a health concern including the provision of suitable health care facilities. The need is greatest South of the Old Kent Road. The borough has the highest rate of emergency hospital admission for dementia in the capital with rates significantly above both

London and England.

15. A dementia care facility falls within the distinct residential institution (C2) use class. The facility is more than a residential unit as it provides direct health benefits, in-addition to benefits overlapping with social care.

16. Southwark 2030 sets out the council's corporate policy, which will be reflected in the project outcome of a new nursing home. This includes: 'Decent homes for all' and 'A safer Southwark'.

17. Southwark Plan 2022 policies relating to this project include AV.14 Peckham Area Vision, as well as strategic policies: SP1 Homes for all (P6 Purpose built shared living, P7 Housing for older people and P8 Wheelchair accessible and adaptable housing), SP2 Southwark Together (P14 Design Quality and P15 Residential design), SP3 A great start in life (P28 Access to employment and training), and SP5 Thriving neighbourhoods and tackling health inequalities (P45 Healthy developments, P49 Public transport, P51 Walking and P53 Cycling).

18. The council's Delivery Plan 2022 - 2026 for Fairer Futures policy is relevant to the project outcome of a new nursing home, under the goal of 'Supporting families' and the objective of 'Ensuring Southwark residents have access to good quality residential and home nursing' and 'Opening a new nursing home'.

19. The S106 agreement for 12/AP/3558, specifies that the Health Contribution can be used towards the provision of additional health services within the borough.

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

**Community impact statement**

20. There is no community impact associated with this report, but the specialist consultant offers community benefit provisions for London Broughs, including: volunteering at food banks; donating to Youth Parliaments; setting up finds for school materials for those who cannot afford back to school equipment; attending careers fairs; work experience to Y12s; 3 x 3-month long summer internships; toolbox talks for colleges from industry experts; donate, decorate and uninstall the Christmas tree for a town hall every year.

**Equalities (including socio-economic) impact statement**

21. The Public Sector Equality Duty is set out in section 149 of the Equality Act 2010, which requires the council to have due regard to the need to:

    - eliminate discrimination, harassment and victimisation;
    - advance equality of opportunity between persons who share a relevant protected characteristic and those who do not;
    - foster good relations between persons who share a relevant protected characteristic and those who do not.

22. The Public Sector Equality Duty requires public bodies to consider those with protected characteristics (which includes age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation) when carrying out their day-to-day work, in shaping policy and delivering services. It applies to every aspect of local government decision making.

23. It is not considered that the proposal has any negative impact on any particular people with protected characteristics.

**Health impact statement**

24. There is no direct health impact associated with this report.

**Climate change implications**

25. There are no climate change implications associated with this report, but the specialist consultant has benefits of climate change impact, including: Net Zero 2040, target across all of JLL's operations and portfolio; assessing financial impacts and opportunities of climate change and take appropriate action; committed to ensuring that they are not sourcing conflict minerals within their supply chain; ensuring all their offices have comprehensive recycling and waste management programs; advocating for climate action through policy engagement, partnerships, and education.

**Resource implications**

26. All staff resourcing implications will be contained within the existing Sustainable Growth North team. Therefore, no additional resources will be required for the scheme's delivery.

**Financial implications**

27. This report seeks the allocation of £200,000.00 from Health Contributions of S106 funds from the total current Health S106 funding envelope of £1,096,625.87. Please note, this total includes S106 contributions to be spent in the vicinity of sites in North Walworth and Rotherhithe hence are not applicable for spend on this project. Paragraph 5 set out S106 Health Contributions applicable to this site, totalling £219,736.26. The funding will be used for the main consultant leading the market-led development opportunity for a new nursing home and for contingency and associated other costs.

28. Once this report is approved, a new capital cost code will be created for the "Asylum Road Nursing Home" in the Planning & Growth capital programme, and with the appropriate budget.

**SUPPLEMENTARY ADVICE FROM OTHER OFFICERS**

**Director of Planning and Growth**

29. The proposed allocation accords with the agreements itemised in paragraph 1 and would provide appropriate mitigation for the impacts of the specific and future developments.

**Assistant Chief Executive – Governance and Assurance**

30. The council's constitution provides that it is the function of planning committee (major applications) to, amongst other things, consider the expenditure of funds over £100,000 of strategic importance secured through legal agreements under section 106 of the Town and Country Planning Act 1990.

31. The Equality Act 2010 introduced the public sector equality duty, which requires public authorities to have due regard to certain equality considerations when exercising their functions, like making decisions. It ensures that those organisations consider how their functions will affect people with different protected characteristics. The relevant protected characteristics are: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, marriage and civil partnership. In summary those subject to the equality duty, which includes the council, must in the exercise of their functions: (i) have due regard to the need to eliminate unlawful discrimination, harassment and victimization; and (ii) foster good relations between people who share a protected characteristic and those who do not. The report considers equalities issues, and the report confirms the proposals are not expected to have a detrimental impact on any protected group under the Equality Act 2010.

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

33. Council Assembly on 14 July 2021 approved a change to the council's Constitution to confirm that all decisions made by the council will consider the climate and equality (including socio-economic disadvantage and health inequality) consequences of taking that decision. This has been considered at paragraphs 21 to 25 above.

**Strategic Director of Resources CAP25/015**

34. This report approves the release of £200,000 from the Section 106 agreements for Asylum Road Nursing Home as outlined in this report.

35. The strategic director of resources notes the resource implications in paragraphs 26 and the supplementary advice from the director of planning and growth and confirms that the council has received the

related funds and that they are available for the purposes outlined in this report.

## BACKGROUND DOCUMENTS

| Background Papers | Held At | Contact |
|---|---|---|
| Asylum Road Nursing Home IDM | Southwark Council<br>160 Tooley Street<br>SE1 2QH | Uzma Aynar,<br>Project Manager Sustainable Growth North<br><br>Tel: 020 7525 2463 |
| **Link:** https://moderngov.southwark.gov.uk/ieDecisionDetails.aspx?ID=8084 | | |

## APPENDICES

| No. | Title |
|---|---|
| Appendix 1 | Asylum Road & Queens Road Site Plan |

## AUDIT TRAIL

| | | | |
|---|---|---|---|
| **Lead Officer** | Stephen Platts, Director of Planning and Growth | | |
| **Report Author** | Uzma Aynar, Project Manager Sustainable Growth North | | |
| **Version** | Final | | |
| **Dated** | 29 May 2025 | | |
| **Key Decision?** | No | | |
| **CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER** | | | |
| **Officer Title** | | **Comments Sought** | **Comments Included** |
| Assistant Chief Executive – Governance and Assurance | | Yes | Yes |
| Strategic Director of Resources | | Yes | Yes |
| Director of Planning and Growth | | Yes | Yes |
| **Cabinet Member** | | No | No |
| **Date final report sent to Constitutional Team** | | | 18 June 2025 |

### 3.1.2 Site Context

The site (outlined in red) was previously occupied by a day centre that closed in 2018. The site has been cleared in advance of future development. The site has a long eastern frontage onto Asylum Road which is lined with four storey nineteenth century terraced houses on its western side. On the eastern corner is the London and Brighton Apartment development with multiple windows and balconies which overlook the site.

The western site boundary is formed by the brick garden walls at the end of the back gardens of the three storey villas at 2-16 King's Grove, and a taller and more recent four storey block of live/work units at 2C King's Grove. The shorter northern boundary is a brick party wall shared with a three storey contemporary infill house constructed at the southern end of the residential terrace at 126A Asylum Road.

The area outlined in blue with a short southern frontage onto Queens Road is also owned by Southwark Council and has been assigned for potential future development. This is taken into consideration with the massing proposals tested in the following section of this report.

Figure 15. Asylum Road Site Map

Agenda Item 8

| | |
|---|---|
| **Meeting Name:** | Planning Committee (Major Applications) A |
| **Date:** | 2 July 2025 |
| **Report title:** | Release of funds totalling £577,522.84 towards the Little Dorrit Park Improvements |
| **Ward(s) or groups affected:** | Borough and Bankside |
| **Classification:** | Open |
| **Reason for lateness (if applicable):** | N/A |
| **From:** | Director of Planning and Growth |

## RECOMMENDATION

1. It is recommended that the Planning Committee (Major Applications) A approves the release of the s106 funds totaling £577,522.84 (which were paid to the council under the terms of the legal agreements pertaining to the planning applications listed in the table below) towards the Little Dorrit Park Improvements (LDPI) project.

| Planning application reference no. | Type | Account number | Address | Indexation | Amount |
|---|---|---|---|---|---|
| 12/AP/1784 | Community Development and facilities | W06655 | 1-16 Blackfriars Road London Southwark SE1 | £2,148.19 | £16,706.19 |
| 12/AP/1784 | Community Projects | W06655 | 1-16 Blackfriars Road London Southwark SE1 | £24,593.40 | £191,259.40 |
| 13/AP/1123 | Play, children's play equipment and sports development | W06845 | Site To The South Of Evans Granary 38 Stoney Street London SE1 9LB | £0.00 | £512.00 |
| 14/AP/3204 | Play, children's play equipment and sports development | W07625 | 61 Southwark Street London SE1 0HL & 15 17 19 Great | | |

| Planning application reference no. | Type | Account number | Address | Indexation | Amount |
|---|---|---|---|---|---|
| | | | Guildford Street SE1 | £937.98 | £39,141.98 |
| 14/AP/3550 | Play, children's play equipment and sports development | W07635 | 53 Great Suffolk Street London SE1 0DB | £753.78 | £63,147.78 |
| 14/AP/3842 | Play, children's play equipment and sports development | W07815 | 185 Park Street London SE1 9BL | £1,161.54 | £17,771.54 |
| 15/AP/5094 | Play, children's play equipment and sports development | W08135 | 4-7 Sudrey Street London SE1 1PF | £1,453.54 | £19,247.54 |
| 17/AP/0367 | Play, children's play equipment and sports development | W08325 | Southwark Fire Station 94 Southwark Bridge Road London SE1 0EG | £0.00 | £7,750.00 |
| 12/AP/3940 | Play, children's play equipment and sports development | W07125 | Sampson House 64 Hopton Street SE1 9JH And Ludgate House 245 Blackfriars Road SE1 And Railway Arches London SE1 | £4,349.38 | £34,081.84 |
| 11/AP/4297 | Parks and public open space | W06175 | Empire Warehouse 1 Bear Gardens 1 & 2 Rose Alley London SE1 9ED | £1,998.54 | £11,297.54 |
| 12/AP/3940 | Parks and public open space | W07125 | Sampson House 64 Hopton Street SE1 9JH And Ludgate House 245 Blackfriars Road SE1 And Railway | £11,542.96 | £90,450.88 |

| Planning application reference no. | Type | Account number | Address | Indexation | Amount |
|---|---|---|---|---|---|
| | | | Arches London SE1 | | |
| 12/AP/3558 | Parks and public open space | W06785 | 90-91 And 92 Blackfriars Road London SE1 8HW | £5,065.35 | £34,742.35 |
| 12/AP/3558 | Play, children's play equipment and sports development | W06785 | 90-91 And 92 Blackfriars Road London SE1 8HW | £0.00 | £4,313.00 |
| 20/AP/0570 | Play, children's play equipment and sports development | W09055 | 49 Surrey Row London Southwark SE1 0BY | £41.75 | £13,817.75 |
| 13/AP/3815 | Public realm improvements | W07295 | Octavia House 235-241 Union Street London SE1 0LR | | £33,283.05 |
| **Total** | | | | | **£577,522.84** |

## BACKGROUND INFORMATION

2. Planning obligations are the legal obligations secured for the purposes of mitigating the impacts of a development proposal and contribute to providing the infrastructure and facilities necessary to achieve sustainable communities. These obligations are secured in legal agreements (commonly known as, section 106 agreements), and which are entered into by parties with proprietorial interests in the development site. This is to ensure that they are binding on the owners of the site and the developers (should they have or subsequently acquire such interests, as the obligations run with the land). These obligations can take the form of a variety of different things and can include the requirement to pay financial contributions to the council. Therefore, receipted financial contributions are often referred to as s106 funds/monies.

3. In addition, the Community Infrastructure Levy (CIL) is a charge which can be levied by local authorities, like the council, on new developments (above a certain size and type) in their area. This regime allows local authorities the ability to raise funds alongside s106 monies, and which can be used to fund a wide range of local and strategic infrastructure that is needed to support growth and development in the borough.

4. The council's 2015 S106 and CIL Supplementary Planning Document (SPD) sets out detailed guidance on the use of planning obligations as well as the Community Infrastructure Levy (CIL).

5. The LDPI project is part of the Leisure Capital Programme, which is a wide-ranging programme of strategic, high quality capital projects delivered for the Leisure Directorate of Southwark Council by the Policy and Programmes Team. It has been developed to deliver a network of high-quality parks, open spaces, cultural and leisure facilities that benefit both existing and new communities. These provide community resources that meet the needs of local neighbourhoods. The programme includes the delivery of improvements to parks (to improve safety, accessibility, layout coherency, and to make them easier to maintain). Improvements enhance the aesthetic appeal of the area, as well as providing high-quality facilities for sport, play, and other leisure and cultural activities.

6. The Borough and Bankside ward has seen significant development over a number of years, which has generated funding towards park improvement projects at Mint Street Park, Nelson Square Gardens and Red Cross Garden.

7. Little Dorrit Park is located in the Borough and Bankside ward approximately 100 metres north of Borough London Underground Station. The park has entrances on Borough High Street, Little Dorrit Court and Disney Place. It is a small park that has experienced little recent investment and is located in a densely populated neighbourhood. There is now an opportunity to invest in the park, to ensure it meets the needs of residents and visitors.

8. Initially funding for the LDPI project was secured in 2015 through a developer contribution related to the adjacent Brandon House development. A right-of-way which allows the council access to the park from Disney Place was re-aligned to benefit the development with the developer contributing £100,000 to the council project.

9. In 2019, a further £96,600 was paid to the council for licence agreements during construction of the development. The licences permitted the developer to locate construction site infrastructure in the park temporarily. This funding has been allocated to the LDPI project.

10. A further £450,000 of Community Infrastructure Levy (CIL) funding was agreed at the Cabinet meetings held in December 2018, June 2019 and September 2024.

11. The LDPI project will benefit the local community through:

    - fencing off the play area, clearly defining it from other areas of the park, to avoid existing conflicts with by-laws and dog walkers and adults entering without children;
    - a new design to improve entrances, paths and park's infrastructure; and
    - addressing safety issues in the park by improving sightlines by removing a high wall in accordance with the Design Out Crime report (see appendix 1).

12. A design (Appendix 2) has been produced. Construction is estimated to commence in autumn / winter 2025. Should significant delays be experienced, inflationary costs could reduce the scope that can be delivered within budget.

13. And should the recommendation set out in paragraph 1 of this report not be approved, the scope of the project would be reduced and the works would be limited to improving the play area only.

## KEY ISSUES FOR CONSIDERATION

14. The Southwark Open Space Strategy (2013) audits provision of open space across the borough, identifies open space need and sets out a vision and objectives for future improvements and investment. The Strategy identifies that the sub-area of Bankside, Borough and London Bridge, in which Little Dorrit Park is located, has a relatively limited amount of open space provision, consisting largely of small squares and churchyards, which is typical of a dense urban environment within central London.

15. The sub-area has a park provision of 0.25ha of per 1,000 population, which is well below the standard of 0.72ha per 1,000 population. This is expected to fall as a result of population growth. Therefore, improving the quality of open space is important, to ensure it best serves the local community.

16. The Southwark Joint Strategic Needs Assessment, North-West Southwark Multi-Ward profile 2023 identifies that Borough and Bankside ward experiences the highest rate of crime in the borough, congruent with other inner-city areas; in 2022 there were almost three-times as many offences than the Southwark average. Designing out opportunities for crime is a key aim for the LDPI project.

17. The Borough and Bankside ward experiences higher rates of emergency hospital admissions. Improving parks has been proven to benefit health and well-being.

18. Children in the Borough and Bankside ward experience poorer health outcomes, with one of the highest rates of emergency hospital admissions in the borough for children aged under five years old. Improving the play area would encourage children to take part in physical activity in the park, improving health outcomes.

19. To date £646,600 has been secured for the project. And as set out in paragraph 1 of this report, £577,522.84 of section 106 funding is hereby sought to allow for the full aims of the project to be delivered.

20. And £208,481.40 of the s106 funding has been specifically allocated for investment in “play, children’s play equipment and sports development” and will be used for the purpose of improving the play area.

### Policy framework implication

21. The LDPI project contributes towards meeting several goals in the Southwark 2030 strategy, including goal 2: A good start to life. The focus of the investment is a small play area for children up to fourteen years of age, encouraging them to develop social skills and assisting their physical development through play.

22. Goal 3 in the Southwark 2030 strategy is a safer Southwark, and officers propose to design out opportunities for crime, responding to the recommendations from the Design Out Crime officer report (see appendix 1).

23. Goal 6 in the Southwark 2030 strategy is a healthy environment; the investment will improve park land and biodiversity in an area that is deficient in green space.

24. The LDPI project will help achieve the aims of the Southwark Nature Action Plan (SNAP) by making nature accessible to all in Little Dorrit Park. Twelve new trees, hedgerows, woodland understory and flowering species for pollinators will be planted.

25. The LDPI project is in line with the council's Sport and Physical Activity Strategy (2019 to 2023) by investing in sports infrastructure. One new table tennis table will be installed.

26. The LDPI project is in line with the following policies in the London Plan 2021:

    a. 'Policy GG3: Creating a healthy city' and 'S5: Sports and Recreation', by including an improved play area which will encourage active and healthy lifestyles. Accessibility to the park will be improved and the park is well connected to public transport and networks for walking and cycling.
    b. 'Policy S4: Play and informal recreation', by improving the play area, and increasing opportunities for children with disabilities to play alongside their friends.
    c. 'Policy G4: Open Space', and 'G5 Urban Greening', by enhancing green space, increasing the size of the tree canopy and adding wildlife-friendly planting.
    d. 'Policy G6: Biodiversity and Access to Nature', by enhancing the habitat in Little Dorrit Park with more shrub planting and trees as this is in line with the SNAP and increases access to nature in an urban environment.

27. The play area has been designed taking into account 'Shaping Neighborhoods: Play and informal recreation, supplementary planning guidance September 2012' (see background documents); putting space, accessibility, inclusion, diversity, safety, and access to nature at the heart of our design, to create a playable environment that encourages healthy lifestyles.

28. The play area design also takes into account Play England's 'Design for Play Guidance' (see background documents) by first considering the outcome objectives for play provision, involving the community in consultation, including inclusive play and seeking to break down barriers to play.

29. The Southwark Open Space Strategy (2013) recommends that entrances and access to Little Dorrit Park should be improved, which will be undertaken during this LDPI project.

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

### Community impact statement

30. Borough and Bankside ward is not considered to be an area of deprivation and is ranked eighth out of the twenty-three wards in the borough (with number twenty-three being the most deprived).

31. A park byelaw (see background documents) currently excludes dogs and adults without children with them from the play area, however with no defined boundary, it is not clear where the play area begins or ends. The LDPI project will resolve this issue by installing fencing around the play area.

32. Visitor observation surveys undertaken in July and August 2023, showed that only 30% of visitors to the park were using the play area. 34% of visitors were sitting on a seat or bench, and 26% were walking around or through the park.

33. This shows that a large proportion of people are visiting the park for reasons other than the play area. Clearly defining the play area boundary with a fence would benefit dog walkers and adults who do not have children with them.

34. The Peace Garden is a small, fenced area which is separated from the main body of Little Dorrit Park by the alleyway leading from Disney Place. This area was only visited by 9% of people, and 78% of those visitors had a dog with them. This shows that people without dogs do not feel welcome in this space.

35. The Open Spaces Strategy notes that the Borough and Bankside ward is deficient in open space. Therefore, it is important to ensure that everyone feels welcome in all open spaces in the ward.

36. Fencing off the park play area will benefit dog walkers, who can then visit the park without the risk of their dog entering the play area.

### Equalities (including socio-economic) impact statement

37. The 2021 Census reveals that Borough and Bankside ward has a lower black, Asian and ethnic minority population (36%) than London (41%) and higher than the UK (13.5%).

38. People from Asian backgrounds were underrepresented during the second public consultation in 2022, with only 5% of surveys completed by people who stated they are Asian compared to 17% of the local population.

39. People from a black background make up 13% of the population in Borough and Bankside ward however only 5% of respondents were black showing at that black people were also unrepresented.

40. Residents aged 20 to 29 years old represent a substantially larger proportion of the population of the Borough and Bankside ward (27.8%) than Southwark as a whole (20.7%).

41. Improving Little Dorrit Park, including the table tennis facilities will provide for the relatively young local community in Borough and Bankside, which has a high proportion of 20 to 29 year-olds.

42. The data collected during the second public consultation showed that children and young people aged seventeen and under were not represented at all with no responses. Older people agreed seventy-five and above were also not represented.

43. People aged 18 to 34 years old were not fairly represented with only 19% of surveys compared to 47.9% of the local population.

44. People aged between 35 and 54 years old were well represented during the second public consultation, making up 62% of the respondents, and representing 24.3% of the local population.

45. People with disabilities were underrepresented during the second public consultation; 7% of respondents identified as having a disability while 13.6% of local residents are registered as having a disability.

46. The Public Sector Equality Duty (PSED) as set out in section 149 of the Equality Act 2010 requires public bodies to consider those with protected characteristics (which includes age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation) when carrying out their day-to-day work, in shaping policy and delivering services. The PSED has been considered for the enablement of this project by undertaking an Equalities Impact Assessment (EQIA) (see appendix 3) and following all feasible recommendations, including:

    a) improving sightlines where possible; this will be achieved through the proposal to remove the old, deteriorating wall on the western boundary. Officers have researched and ascertained that the wall has no known historical significance;
    b) Installing suitable surfaces and gradients;
    c) Incorporating inclusive play equipment to increase opportunities for children with disabilities to play alongside their friends;
    d) Installing accessible seating which is seating with a back for support and arm rests to assist residents with lowering and raising themselves. The seating will also have an adjacent area of hardstanding surface for a wheelchair to sit alongside; and
    e) The gates to the main entrance on Borough High Street will be replaced with lighter gates that are easier to open.

47. Officers have considered the recommendations from the EQIA and in addition to the improvements referenced in paragraph 46 a-e, the scheme will also deliver the following improvements in paragraphs 48 – 51 to the PSED considerations.

48. An accessible round-about, basket swing, and accessible trampoline are inclusive play items that are in the play area design. The climbing equipment

includes accessible ramps and a wide slide so it can be enjoyed by children with disabilities.

49. Older residents and pregnant people are provided for with new seating across the park and increased accessibility in and around the park by removing the existing internal gate between the Borough High Street area and the play area.

50. Access will be improved in the Peace Garden by removing the sunken mosaic. In Little Dorrit Park, raised kerbs currently restrict access in some areas. The kerbs will be removed and all thresholds will be level.

51. Signage and information in noticeboards will indicate that the nearest public toilet facilities are located in John Harvard Library only 50 metres from the park's main entrance.

52. Improving parks has been proven to have a positive effect on the local economy.

**Health impact statement**

53. Emergency admissions in young children are frequently preventable and often give an indication of wider determinants of poor health such as issues with housing and poor air quality. In the Borough and Bankside ward, 112.8 children aged 0 to 4 years-old per 1,000 population were admitted to the accident and emergency department in 2019/20, which is significantly above the borough average of 93.0 children.

54. In the Borough and Bankside ward 43% of children were classified as having excess weight at year 6, which is slightly more than the Southwark average of 41%.

55. The refurbished play area, new table tennis table, and open lawn for activities will encourage local people to be physically active, which has associated health benefits.

56. Contact with nature and spending time in green spaces in a highly urban environment has also shown to have mental health benefits. Borough and Bankside contains few parks and open spaces, and therefore it is important that quality is high, to encourage visits.

**Climate change implications**

57. The Greater London Assembly (GLA) Climate Risk Maps (see background documents) show that Little Dorrit Park is in an area of medium to high heat risk. The LDPI project includes planting twelve new trees, which will increase the tree canopy and contribute towards reducing heat risk.

58. The GLA Climate Risk Maps also show that the park is in a medium flood risk zone, and the LDPI project will seek to combat this by increasing the amount of green space and using permeable surfaces where possible including a highly permeable play area safety surfacing.

59. A cork-based safety surfacing is proposed in the play area, which as well as having a high level of permeability compared to synthetic materials, can also be up to 30% cooler in the summer, helping to reduce the urban heat island effect. It has a negative carbon balance when considering the carbon sequestration of cork oak forests and production-related emissions, which is even better than being carbon neutral.

60. A flood risk assessment and strategy are being commissioned to ensure that the drainage strategy will reduce flood risk

61. Where possible, materials will be sourced locally, and robust, recycled, and sustainable products will be used, including materials such as FSC-certified wood. Using high-quality products will reduce maintenance requirements and ensure a longer lifespan of play equipment and park furniture.

**Resource implications**

62. Resources for the delivery of the LDPI project can be contained within current staffing.

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

64. The LDPI project aims to reduce the ongoing maintenance cost to the council through removal of the old wall, which currently requires regular structural safety inspections and repairs. Once the wall is removed, these costs will no longer be incurred.

**Legal/Financial implications**

65. Currently, the LDPI project funding is as follows:

| Amount | Details of funding | Status | Purpose |
|---|---|---|---|
| £450,000.00 | Community Infrastructure Levy (CIL) funding, agreed at Cabinet meetings held in December 2018, June 2019 and September 2024 | Secured | Improving Little Dorrit Park |
| £100,000.00 | Funding from the disposal of a right of way, agreed at the Cabinet meeting held in February 2015 | Secured | Improving Little Dorrit Park |
| £96,600.00 | 2019 License agreements relating to Brandon House development | Secured | N/A |
| £577,522.84 | S106 funding | Unsecured | Various; see table in paragraph 1 |

| Amount | Details of funding | Status | Purpose |
|---|---|---|---|
| **Total: £1,224,122.84** | | | |

66. The LDPI project estimated spend profile is shown in the table below:

| Estimated amount | Description |
|---|---|
| £840,000 | Main works contract |
| £84,000 | Main works contingency at 10% |
| £320,000 | Fees, surveys and other project costs |
| **£1,244,000** | **Total project cost to deliver** |

67. The LDPI project aims to reduce ongoing revenue costs to the council through good design and the use of high-quality materials that last a long time.

68. Should the recommendation set out in paragraph of this report be approved, budget needs to be added to the project “LITTLE DORRIT PARK” cost code “L-2340-0510.”

**Consultation**

69. Two public consultations have been undertaken in 2020 and in 2022, working in partnership with Bankside Open Spaces Trust (BOST). BOST are an environmental charity who are active in the Bankside area and have valuable local knowledge and links to the community which added value to the consultation process.

70. Reports detailing the results and outcome of the public consultations are available (see appendices 4 and 5).

71. The second consultation invited residents to comment on two design options which were based on feedback during the first consultation that was held in 2020.

72. During the second consultation, half of the respondents mentioned that they felt there was a lack of provision for dogs. However, in both design options the amount of open space that dogs and their owners can use had been increased. Dogs will continue to be permitted in the Peace Garden and after the LDPI project has been implemented will also be permitted in the majority of Little Dorrit Park, except the fenced play area.

73. History information boards were suggested by the public and the final design includes two information boards.

74. Although some people were in favour of having an outdoor gym, others felt it is not needed, because there are already outdoor gyms nearby at Mint Street Park and Tabard Gardens. An outdoor gym is no longer included in this LDPI project.

75. Keeping the roses was important for a few people and officers propose to move them to a better location, in the new ‘Victorian Garden’.

76. Some respondents requested lighting in the park. It is not recommended, as this can create a false sense of security and could lead to antisocial behaviour due to encouraging people to use the park at night.

**SUPPLEMENTARY ADVICE FROM OTHER OFFICERS**

**Director of Planning and Growth**

77. The proposed allocation accords with the agreements itemised in paragraph 1 and would provide appropriate mitigation for the impacts of the specific and future developments.

**Assistance Chief Executive – Governance and Assurance**

78. Under Part 3 (F) of the council's constitution it is the function of the planning committee (major applications) to, amongst other things, consider the expenditure of funds over £100,000 of strategic importance secured through legal agreements under section 106 of the Town and Country Planning Act 1990.

79. The section 106 monies must be expended in accordance with: -

(a) the terms of the specific agreements; and

(b) the legal tests below which are enshrined in Regulation 122 (2) of The Community Infrastructure Levy Regulations 2010 in that they must be: -

(i) necessary to make the development acceptable in planning terms;
(ii) directly related to the development; and
(ii) fairly and reasonably related in scale and kind to the development.

80. The Equality Act 2010 introduced the public sector equality duty, which merged existing race, sex and disability equalities duties and extended them to include other protected characteristics; namely age, gender reassignment, pregnancy and maternity, religion and belief and sex and sexual orientation, including marriage and civil partnership. In summary those subject to the equality duty, which includes the council, must in the exercise of their functions: (I) have due regard to the need to eliminate unlawful discrimination, harassment and victimisation; and (ii) foster good relations between people who share a protected characteristic and those who do not. Officers consider that the recommendation set out in paragraph 1 of this report (if so approved) will not have a disproportionate negative effect on any particular protected group under the Equality Act 2010.

81. The Human Rights Act 1998 imposes a duty on the council as a public authority to apply the European Convention on Human Rights; as a result, the council must not act in a way which is incompatible with these rights. Such rights include (but are not limited to) Article 8 (respect for private and family life); Article 6 (right to a fair trial) and Article 1 of the First Protocol (right to peaceful enjoyment of property). Officers consider that the recommendation set out in paragraph 1 of this report (if so approved) will not result in a breach of the provisions in the Human Rights Act 1998.

**Strategic Director of Resources**

82. This report seek approval to release £577,522.84 from the Section 106 agreements for improvements to Little Dorrit Park as outlined in this report.

83. The strategic director of resources notes the resource implications in paragraphs 62 to 64 and the supplementary advice from the director of planning and growth and the assistant chief executive, governance and assurance and confirms that the council has received the related funds and that they are available for the purposes outlined in this report.

## BACKGROUND DOCUMENTS

| Background Papers | Held At | Contact |
|---|---|---|
| Southwark Open Spaces Strategy 2013 | Southwark Council<br>160 Tooley Street<br>London SE1 2QH | Parks Division<br><br>Email:<br>parks@southwark.gov.uk |
| **Link:**<br>https://www.southwark.gov.uk/sites/default/files/2024-08/Southwark_open_space_strategy_Jan_2013_low_res_.pdf | | |
| Childhood obesity in Southwark<br>Southwark's Joint Strategic Needs Assessment | 160 Tooley Street<br>London SE1 2QH | Southwark Public Health Division<br><br>Email:<br>publichealth@southwark.gov.uk |
| **Link:**<br>https://www.southwark.gov.uk/sites/default/files/2024-10/Southwark%20JSNA%202019%20%20Childhood%20Obesity.pdf | | |
| Southwark 2030 Strategy | Southwark Council<br>160 Tooley Street<br>London SE1 2QH | Joseph Brown<br>Email:<br>joseph.brown@southwark.gov.uk |
| **Link:**<br>https://education.southwark.gov.uk/assets/attach/10264/Southwark-2030-strategy-FINAL-.pdf | | |
| Southwark Nature Action Plan | Southwark Council<br>160 Tooley Street | Liam Nash,<br>Ecology Officer, |

| | | |
|---|---|---|
| | London SE1 2QH | Email: Liam.nash@southwark.gov.uk |
| **Link:** https://www.southwark.gov.uk/sites/default/files/2024-10/southwark_nature_action_plan.pdf | | |
| Sport and Physical Activity Strategy 2019-2023 | Southwark Council 160 Tooley Street London SE1 2QH | Jardine Finn, Outdoor Recreation Manager, Email: Jardine.finn@southwark.gov.uk |
| **Link:** https://www.southwark.gov.uk/sites/default/files/2025-01/Southwark%20Council%20sport%20and%20physical%20activity%20strategy%202019-2023.pdf | | |
| London Plan 2021 | Greater London Authority City Hall, Kamal Chunchie Way, London E16 1ZE | Greater London Authority<br><br>Tel: 020 7983 4000 |
| **Link:** https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf | | |
| Shaping Neighborhoods: Play and informal recreation, supplementary planning guidance September 2012 | Greater London Authority City Hall, Kamal Chunchie Way, London E16 1ZE | Greater London Authority<br><br>Tel: 020 7983 4000 |
| **Link:** https://www.london.gov.uk/sites/default/files/osd30_shaping_neighbourhoods_play_and_informal_recreation_spg_high_res_7.pdf | | |
| Play England's 'Design for Play Guidance' | Play England, Scrapstore House, 21 Sevier St, Bristol BS2 9LB | Play England info@playengland.org.uk |
| **Link:** https://www.playengland.org.uk/designforplay | | |
| Southwark Parks Byelaws | Southwark Council 160 Tooley Street London SE1 2QH | Southwark Council |

| | | |
|---|---|---|
| | Sport and Physical Activity Strategy 2019-2023 | Email: parks@southwark.gov.uk |
| **Link:** https://services.southwark.gov.uk/assets/attach/7691/Byelaws-for-Parks-and-Open-spaces.pdf | | |
| Greater London Authority Climate Risk Maps | Greater London Authority<br>City Hall, Kamal Chunchie Way,<br>London E16 1ZE | Greater London Authority<br><br>Tel: 020 7983 4000 |
| **Link:** https://data.london.gov.uk/dataset/climate-risk-mapping | | |

**APPENDICES**

| No. | Title |
|---|---|
| Appendix 1 | Design Out Crime Officer feedback – June 2023 |
| Appendix 2 | Design for the Little Dorrit Park Improvement project |
| Appendix 3 | EQIA OpenAcessame Little Dorrit Park redevelopment |
| Appendix 4 | Little Dorrit Park and Peace Garden Consultation Summary |
| Appendix 5 | Little Dorrit Park Improvement Project; Results of the Second Public Consultation |

**AUDIT TRAIL**

| | |
|---|---|
| **Lead Officer** | Stephen Platts, Director of Planning and Growth |
| **Report Author** | Matthew Hill, Project Manager, Policy and Programmes team, Leisure Directorate, Environment, Sustainability and Leisure |
| **Version** | Final |
| **Dated** | 30 May 2025 |
| **Key Decision?** | Yes |

| **CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER** | | |
|---|---|---|
| **Officer Title** | **Comments Sought** | **Comments Included** |
| Assistant Chief Executive – Governance and Assurance | Yes | Yes |
| Strategic Director, Resources | Yes | Yes |
| **Cabinet Member** | Yes | Yes |
| **Date final report sent to Constitutional Team** | | 18 June 2025 |

**APPENDIX 1**

**Design Out Crime officer feedback on designs and park – June 2023**

- To have minimum number of entrance/exits points (To avoid toddlers going missing or dog theft). To reduce the permeability, to prevent for robbers, sexual offenders, etc to commit offences and escape via a different/ multiple routes.
- Boundaries fences between 1.8m and 2.1m in height
- Only one entrance to the Peace Garden area to minimise dog theft although it is not considered as a dog exercise area
- 2m clear stem on trees and 1m maximum height in vegetation/bushes with clear stems at the base to avoid people hiding drugs, knives, etc. Clear lines of sight improve visibility and surveillance, in turn decreasing the fear of crime.
- Dogs on leads on main area outside the playground fence to avoid conflict with children playing football and people having picnics
- Hoop-top fencing. What we have currently in the park is ok and between 1 and 1.2m in height for the playpark
- Self-closing gates to stop children running out and dogs getting in to playpark. Psychological delineation for older youths, street drinkers, drug users etc to not enter the children's playpark.
- Area to be maintained without graffiti, clean and tidy and equipment maintained. Any graffiti, litter, damage is immediately removed and cleaned up.
- Current lamp column lights in line with BS 5489 2020, not sodium lights and the case clean.
- Mobile CCTV installed in lamp columns if possible.
- Good to have zigzag paths. Robbery hotspot.
- Seating: Not located under tree canopies and designed in a way to not congregate, to avoid street drinking, rough sleepers and with armrest such as Hackney benches.
- Remove wall between the park and Disney Place if possible to have as much visibility as possible.
- In the school wall by Little Dorrit Court, to create murals or paintings to brighten up the area.
- To avoid violence against women and girls, the park should be open, friendly and to encourage the right users.

# APPENDIX 2

All drawings are copyright of erect architecture, do not scale from drawings, the contractor is to verify all dimensions on site prior to any manufacture

Take out sunken area level and turf on existing

Indicative drain gully poistioning

New wall height as FFL. New standard vertical bar railings to be 1500mm, to match Existing.

railing 1.8m with new retaining wall to park soil levels

Existing Railings and wall to be retained. Railings to be repainted.

Existing rose garden relocated to Victorian Garden

Stone fragments moved into Victorian garden

Retain existing railings and repaint

Cut wall down to seat level to create seating plinth

If budget allows to resurface Disney Place

Existing rose bush by entrance relocated to Victorian Garden

Wall reduced to ground level and new paving to mark out footprint of wall

Internal playground fence to be 800mm in height

Existing paving to be retained

TigerMulch Nature Trail Path

Peace Garden

Playground

Activity Area

Entrance

Victorian Garden

Open Space

LP

LP Indicative only

## Legend

### Surfacing

- Tarmac Path
- Safety Surface 1
- Safety Surface 2 (paths)
- Granite setts or ceramic tiles in varying patterns with victorian style
- Reinforced grass area for emergency access
- Existing paving
- (S1) Mosiac area to be removed
- (S2) Repair drainage new MOT3 subbase geogrid in RDA new concrete paving*

### Planting

- Existing Tree with RPA
- Removed Tree
- New Tree
- New Tree within sewer easement zone
- Planting
- (PL1) Raised Planter
- Existing rose bush relocated
- Existing planting bed

### Street Furniture

- Existing stone fragments relocated
- Victorian stone bird bath 1 no
- Victorian cast iron chair and table
- Bench 10 no
- Timber sleeper bench 2no
- Timber picnic bench 2 no
- Timber accessible picnic bench 1 no
- Insect Home 3no
- (F1) Interpretation board - Powdercoated steel panel 2 no
- Existing water fountain

### Play Equipment

- (P1) Concrete table tennis table
- (P2) Nest Swing
- (P3) Double Swing
- (P4) Stepping stones
- (P5) Limburg Play Structure (6-12yrs)
- (P6) Wheelchair acc'ble trampoline
- (P7) Wheelspin roundabout
- (P8) Timber train
- (P9) Areal Typ 1 Play Structure (3yrs+)

### Boundary

- Boundary wall to be reconfigured and rebuilt with railing
- Boundary wall and railing to Little Dorrit Court to be rebuilt
- New Standard Vertical Bar railings, 800mm
- Boundary wall to Victorian Garden removed, with pavers marking footprint of wall and railings
- (G1) New Gate 3 No

*This scheme envisages permeable surfaces throughout. Permeable surfaces will require a permeable build up. The depth depends entirely on the infiltration test results, and at the moment the scheme allows between 100mm-150mm of Type 3 subbase below the surfacing layers. This would apply to all types of surfacing. Also allow a geotextile separator between the subgrade and the subbase. The existing subbase & build up will need to be removed and the subgrade is to be scarified to improve the permeability*

**ERECT** ARCHITECTURE
Unit 22b, 8 Andrews Road, London E8 4QN +44 (0)20 7254 6336

| | |
|---|---|
| client | London Borough of Southwark |
| project | Little Dorrit |
| title | Proposed Plan Option 3 |
| scale | 1:200 at A2 |

| rev. | date | description |
|---|---|---|
| C | 10 Aug 2022 | Revised Layout |
| D | 17/02/2023 | Revised Layout |
| E | 19/12/2024 | Restart of scheme |
| F | 14/01/2025 | Client Revisions |
| G | 22/01/2025 | Client Revisions |

| project no. | drawing no. | revision |
|---|---|---|
| 21388 | 202-GA-Opt 3G | |

0m 1m 5m 10m 1:200

**APPENDIX 3**

Brenda Puech
NRAC Access Consultant
Open Accessame

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# Equality Impact Assessment

## of Redevelopment Proposals for Little Dorrit Park and Peace Garden

**December 2024**

]

## Document versions

| Version | Date | Prepared by | Issued to | Notes |
|---|---|---|---|---|
| V1 | 06/12 2024 | Brenda Puech | Matthew Hill Southwark Council | |

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# 1. Introduction

## 1.1 The project background and brief

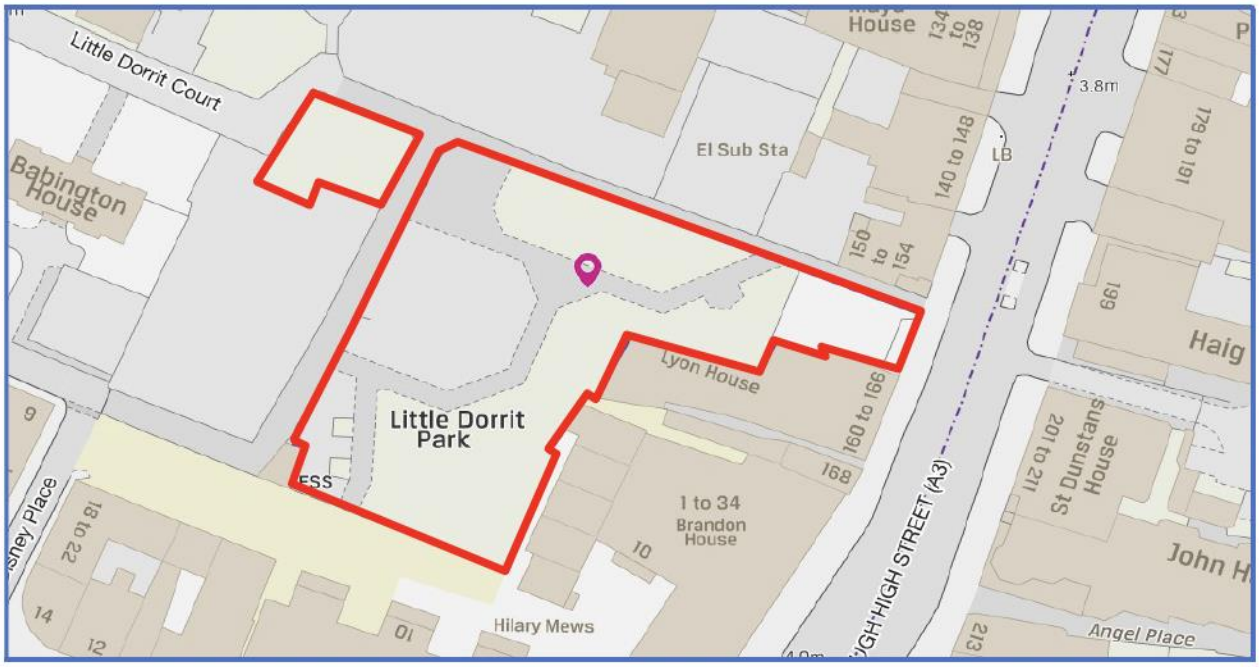
Little Dorrit Park and Peace Garden are located in the Borough and Bankside ward of the borough, located off Borough High Street, with London Bridge Underground Station a short walk away. The area is less than a quarter of an acre in size.

Little Dorrit Park is named after the hero of a book by Charles Dickens, who had lived in rooms in nearby Lant Street whilst his father was imprisoned in the Marshalsea Prison for debt.

Little Dorrit Park was originally a small open derelict space  It was reconstructed in 1970s and further renovated in 2001. The renovation works were carried out by Little Dorrit Park Group, set up by a group of local mothers. Works included playground improvements and landscaping. A wrought iron gate and playground equipment were also installed.

The park is now supported by Bankside Open Spaces Trust (BOST), a local charity who run volunteer activities in parks and open spaces in the local area.
BOST carried out two virtual consultation sessions in October and November 2020, along with an online survey for the renovation of the Park.

**Location plan and site boundaries**



## 1.2 Project Objectives

Objectives identified in the brief include:

1. Improve the play equipment for primary school children - accessible to both children with disabilities and children without disabilities, so they can play together.
2. To repair/renovate damaged surfaces.
3. To create a space that will encourage use by the public and ultimately add value to the rest of the park.
4. Better layout of the spaces to improve flow and sightlines
5. Incorporate historical elements
6. Improve boundary treatments and access to and from the High Street.
7. Create an area for adults without children which does not overlook the play space(s)

The project needs to enhance Equal Opportunities including:

- This scheme must seek to enable easy access for people with disabilities or limited mobility, and fully comply with the Equality Act 2010. Particular user groups that will need to be catered for include older people and parents with young children. Provision should also be made for wheelchair use and for people with limited or partial sight.
- Measures may include appropriate surface treatments, sensitive placement of furniture and initiatives to aid interpretation of park elements. The consultant will be required to advise on appropriate measures for the scheme to aid equality of access and enjoyment.

## 1.3 Aims and scope of the Equality Impact Assessment

This EQIA assesses the impact of the proposed scheme in Little Dorrit Park on relevant groups with protected characteristics in relation to the Equality Act. It focuses on the impact on older and disabled people, people of different races, and also how the design may affect pregnant women and parents with small children.

The Equality Impact Assessment (EQIA) focuses on

- identifying the key aims of the guidance and the scheme,
- systematically assessing and recording the likely equality impact of an activity or policy.
- identifying any direct or indirect discrimination,
- identifying whether certain groups are excluded from any of the services,
- assessing the impact on people with protected characteristics,
- making sure that, as far as possible, any negative consequences are eliminated or minimised.
- opportunities for promoting equality and improving services are maximised.

## 1.4 Legal context: Southwark Council Public Sector Equality Duty

The Equality Act 2010 sets out duties and responsibilities of service providers in relation to disabled people as defined by the Act. The Act defines a disabled person as 'someone who has a physical or mental impairment, which has a substantial and long-term adverse effect on his or her ability to carry out normal day to day activities.'

Councils have general legal responsibilities to demonstrate that they are taking action to promote equality in relation to policy making, the delivery of services and employment

More specifically, Public Authorities have a lega**l** responsibility to assess their activities, and to set out how they will protect people from discrimination on the basis of the nine 'protected characteristics: Age, Disability, Gender reassignment, Marriage and civil partnership, Pregnancy and maternity, Race, Religion or belief, Sex, Sexual orientation.'

EQIAs are one of the key ways in which public authorities can meet their general duties on equality. These require that due regard is given to achieving the goals set out in the general duties, all with the aim of achieving greater equality for affected groups.

The weight that public authorities give to equality should be proportionate to its relevance to a particular function. EQIAs can help identify the most proportionate and effective responses.

## 1.5 Climate Change Strategy

Consideration must be given regarding interventions to assist in meeting the target of being carbon neutral by 2030. An Action Plan is set out in the council's Climate Change Strategy.

## 1.6 Inclusive Design Approach

Inclusive design principles highlight:

- The benefits to mental and physical health that parks provide that need to be preserved by reducing anxiety and stress for users.
- Parks operate as important places for social interaction and recreation, and as an important part of the wider cycling and walking network.
- Path networks are key consideration for comfort and use. These should be designed for all to be inclusive, high quality and easily accessible.

## 1.7 Site Visit 2 October 2022

A site visit was conducted on 2 October 2022. This outlined the following:

- The project scope and concept design so far are well thought out and include equality and inclusivity considerations throughout, without separating out different groups.
- Key issues such as good sightlines, suitable surfaces and gradients, lighting, safety, inclusive play equipment and inclusive seating are well covered.
- The lack of perceived security and discomfort due to high walls each side of the Little Dorrit Court (which could be reduced by provision of railings rather than high walls).
- We would have included amending the steep gradient at the entrance of Disney Place but that appears to be outside the scope of the project.
- A level link should be provided between the Little Dorrit Garden and the Peace Garden.
- It was noted that the gate opening force to the Peace Garden was heavy and needs to made lighter with at least one leaf of the double gate providing 850mm clear opening.
- One further issue is that of shelter - the scope should include shelter provision for seating, whether under a tree, a permanent canopy or temporary umbrella. Provision of shelter from inclement weather is part of the Healthy Streets (and Places) principles.
- The other would be provision of tables in between or at side of seating, as this is essential for comfort to put down refreshments, or reading material.

## 1.8 Standards for assessment

Standards and criteria for accessibility include:

- Need to maximise access to and use of Little Dorrit Park and Peace Garden for all users
- Requirements of the Equality Act 2010
- Currently published best practice standards and guidance to meet the needs of disabled people as set out in:
    - The London Plan 2021 *;*
    - *Inclusive Mobility: A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure,* DfT, 2022
    - BS 8300:2018 *Design of an accessible and inclusive built environment, Part 1 External environments - Code of practice*
    - By all reasonable means: Inclusive access to the outdoors for disabled people, The Countryside Agency, 2009
    - *Sign Design Guide,* Sign Design Society, 2001

## 1.9 Other documents reviewed

1. Protected Characteristics in Southwark: JSNA Factsheet (Southwark's Joint Strategic Needs Assessment)

2. Multi-Ward Profiles 2019 North West Southwark JSNA Factsheet, 2019
3. Southwark's Open Space Strategy, 2013 sets out standards for different types of open spaces and provides an action plan. The relevant policies on open space demonstrate Council's commitment to improving quality of walking and cycling in the borough as both benefit health and well-being and enable wider environmental and social benefits.
   Parks are seen as important spaces for social interaction and recreation and essential part of wider cycling and walking network.

## 1.10 Scheme proposals reviewed

Erect Architecture's description of the scheme:

"The new proposal will integrate the historical features of the park and provide an inclusive play offer for children of diverse ages and abilities. Biodiverse planted and wildlife areas will be created, alterations to the fencing along Little Dorrit Court/Birdcage alley will better integrate the street with the park and improve sight-lines for users' safety. A communal space and seating area will be provided to better accommodate school rush hour socialising and play and a more open entrance to Borough High Street will encourage public use, providing recreational space for adults without children."

## 1.11 Disclaimer

The Equality Act 2010 is civil legislation requiring individuals and organisations not to discriminate against disabled people. Public sector organisations have to comply with their Public Sector Equality Duty.

It is the authority or service provider who must meet the requirements of the Act, and buildings or physical environments cannot 'comply' with the Equality Act.

This report makes reference to current regulations and best practice, which are subject to change.

This report does not constitute a health and safety assessment.

Following the advice contained in this report cannot ensure that the service provider will meet the requirements of the Act or render them immune from the award of damages under the Act.

## 1.12 Little Dorrit Park and Peace Garden neighbourhood community profile

Southwark is is a diverse borough with people with a wide range of ethnicities and backgrounds.

It is one of the most deprived boroughs in England, ranked 40th out of 326 local authorities.

In addition, there are significant health inequalities whereby prevalence of obesity, smoking and sedentary lifestyle is higher in residents from more deprived backgrounds.

28% of Southwark's children (under 16 years) live in low-income families.

Little Dorrit Park and Peace Garden is in Borough ward in the North-West multi-ward area of Southwark.

The profile for this area indicates:

- North West Southwark has fewer children, young people and older people when compared with Southwark as a whole
- In contrast, the working age population is slightly larger than the Southwark average.
- Significantly more children live in households claiming out of work benefits than the borough average.
- Southwark has particularly high prevalence of child obesity. Approximately one-quarter of children living in North West Southwark are overweight or obese in Reception, rising to over 40% by Year 6.

- The overall crime rate in North West Southwark is significantly higher than the borough average, with the rate in Borough & Bankside particularly high.

The profile indicates priorities for improving the local park that include:

- Attracting local people into Little Dorrit Park and Peace Garden Park for the purpose of play and exercising, walking and running, particularly for children and younger people, and less active people, would be beneficial to the local community.
- Crime rates are high and security and lighting concerns need high priority.

## 1.13 Community consultation

Bankside Open Spaces Trust (BOST) were appointed by Southwark Council to build on BOST's existing community network in the area and to undertake a public consultation. The consultation has engaged with the local community and park visitors, to better understand what enhancements local people would like to see in Little Dorrit Park.

A second consultation with park users and local communities in 2022 indicates preferences for:

- Better wider entrance, though concerns about use by moped and scooter users
- Play areas to be located at a distance from residential properties
- Play equipment to be suitable for children with disabilities
- More space for dogs
- Preference for open lawn area and a wildlife retreat.
- Nature and biodiversity use
- History information boards
- Benches and picnic tables
- More lighting (not being included due to impact on wildlife)
- Removal of high walls to sides of Little Dorrit Court
- Concerns about anti-social behaviour
- Better lighting

## 1.14 Inclusive Play Principles

The right to play is recognised as a human right in UN Convention on the Rights of the Child.

The London Plan's Play and Informal Recreation SPG says:

> *"All children should be able to access equipment and play opportunities that are exciting and fun and offer various levels of challenges. Sensory experiences as well as the use of equipment that can be used in different ways by children at different stages of development and with differing levels of ability should be encouraged."*

It is well known that children with impairments make good use of their playgrounds with their friends, and benefit enormously from the experience.

Successful play spaces offer enjoyable play experiences to disabled children and young people, and to those who are non-disabled, whilst accepting that not all elements of the play space can be accessible to everyone. Children with different abilities can play together in well designed play spaces, and parents and carers who are themselves disabled should be able to gain access to play spaces if they are to accompany their children.

Enabling all children to play, and to play together, is about a benefit to the whole community. If any child is prevented from playing then it diminishes the play experience of all.

Benefits of accessible play spaces include:

- Children with disabilities can enjoy the benefits of active play, enhancing social skills and overall health
- All children learn valuable lessons about the world, including that everyone has similarities and differences
- All children develop concepts related to tolerance, diversity, and acceptance
- Everyone can access, interact, and have fun in the play spaces, including parents, grandparents, and members of the community with disabilities

A play space may include the following elements:

- A selection of approaches into the play space
- Adequate space for wheelchair users to access and manoeuvre around equipment
- A smooth, even, shock-absorbent surface that allows access to play equipment with minimal effort
- Opportunities for physical challenge with minimal hazards
- Good use of visual contrast to define edges of paths and edges and outlines of play equipment and features
- Accessible features and amenities, such as planter boxes and benches of different heights and sizes to accommodate all abilities
- Opportunities to enjoy some features of the play space in separate ‘quieter’ areas adjacent to the main play equipment that allows for low stress play experience
- Shiny surfaces should be avoided, as they can produce a disturbing glare that can inhibit the ability of people with vision loss to orient themselves.
- Sensory elements also offer clues to help children orient themselves to the different areas and elements within the play space. This equipment typically includes the use of:

    - Sound and musical elements, such as talk tubes or falling water
    - Textured paths, textured designs, and shapes
    - Aromatic plants and gardens
    - Elements that can be manoeuvred and that move and respond to touch
    - Colour, patterns, and light
    - Moving components like tic-tac-toe
- Equipment that promotes sensory development, with features incorporating texture, manipulative devices, contrasting colours, and sound to enhance auditory, tactile, and sensory awareness and to encourage artistic and aesthetic development

For assistance animals provide:

- Spending area
- Available drinking water

Suggestions for play equipment

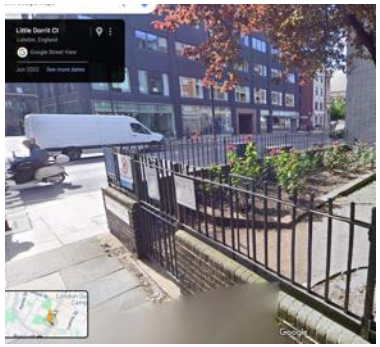
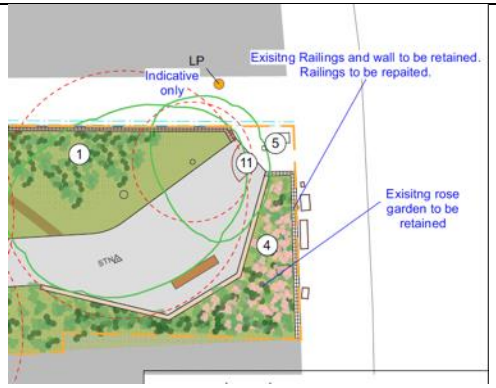
- Larger rocking equipment: These often have the benefits of a backrest, footrest, handrail and a side, so that a child can be reasonably supported in it and have an accompanying friend or adult sitting alongside.
- Wider slides, or double slides, that allows an adult to support a child
- Rigid harness swings (need to be installed at a higher level)
- Horizontal monkey bars permitting children in wheelchairs to pull themselves along
- Low level balancing bars are helpful to children with Downs Syndrome, or who are deaf, because these children can benefit from activities that help improve their balance.

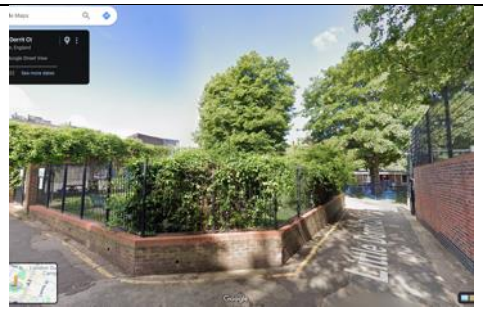
## 2. Equality Impact Assessment Summary of redevelopment proposals for Little Dorrit Park and Peace Garden

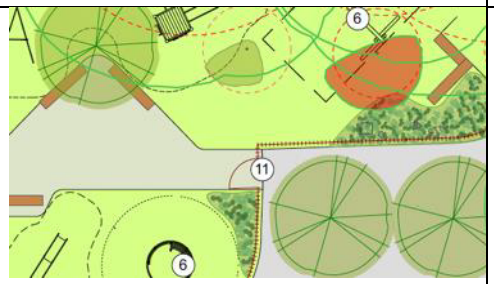
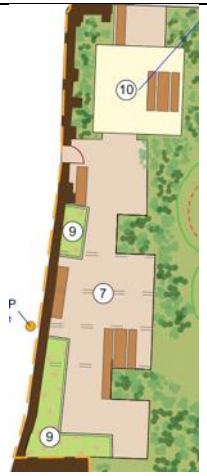
| Protected Characteristic | Impact of proposals | Comment |
|---|---|---|
| Age | | The proposals provide suitable, accessible and inclusive facilities for a range of ages, including adults, young children of all ages, as well as for older and disabled people. |
| Disability | | The proposals are well considered and inclusive and accessible for a wide range of disabled people, including wheelchair users, people with mobility impairments, visual impairments, sensory impairments and cognitive impairments. |
| Marriage and civil partnership, | | Not applicable |
| Pregnancy and maternity | | Pregnant women who need a rest and parents with babies and small children are well catered for in relation to play areas, resting places and seating provided. |
| Race, Religion or belief | | Given the high diversity of the area, providing more cultural references including artwork, signage and planting could ensure inclusion of range of cultural and ethnic groups. |
| Sex, Gender reassignment, Sexual orientation | | Security is more of a concern for women, older people and minorities who are vulnerable to hate crime. The proposals need to respond to the needs of groups with these protected characteristics by providing adequate lighting, fewer hiding spaces, good sightlines etc. |

# 3 Equality Impact Assessment of proposals

| | Element | Photo | Assessment of feature | Recommendations |
|---|---|---|---|---|
| 1 | Blue Badge parking | | There is no on-street parking available at Borough High Street which is a busy bus Red Route | No action required. |
| 2 | Cycle parking | | There are plenty of cycle parking racks on the footway at Borough High Street, but none within the Park. | Some cycle parking for disabled cyclists should be provided within the Park to accommodate wider and adapted cycles with a lower level bar to lock to. |
| 3 | View of Park from Borough High Street | | The current entrance to the Park is not prominent or clear from Borough High Street. | The entrance may benefit from a sign or vertical or prominent feature to draw attention to it. |

| | Element | Photo | Assessment of feature | Recommendations |
|---|---|---|---|---|
| 4 | Entrance from Borough High Street | <br>  |  <br>The rose-garden is not really visible from the street, and is more visible when one enters Little Dorrit Court. | The corner opening will improve visibility of the entrance, but signage and vertical feature would make it more prominent.<br><br>Does wall need to be retained, and can it be lowered, as it is a visual obstruction. Railings rather than a wall would be more permeable. |
| 5 | Little Dorrit Court at Borough High Street end | | This narrow lane benefits from a low railing to the side near the entrance from Borough High Street which gives it a sense of openness and security. | Night lighting needs to be maintained. |

| | Element | Photo | Assessment of feature | Recommendations |
|---|---|---|---|---|
| 6 | Little Dorrit Court further away from Borough High Street | | Further down the lane, the walls on each side become higher, and it has a more oppressive and claustrophobic feel to it. | Provision of railings rather than a high wall would be beneficial for the quality of the space and the feeling of security. |
| 7 | Playground | | Little Dorrit Court opens out further down, with railing surround to the playground, which creates good visibility. | Low railings are retained which is good practice. |
| 8 | Peace Garden |  | On the other side the Peace Garden has a low wall, which also facilitates good visibility and feeling of inclusion. | Low railings are retained which is good practice. |

| | Element | Photo | Assessment of feature | Recommendations |
|---|---|---|---|---|
| 9 | Seating |  | The proposals indicate individual benches along the walking route.<br><br>Noted also seating areas with two benches at an angle where a small group can face each other. This provides a good seating arrangements for range of visitors. | A choice of seating options and heights is useful with and without arm-rests. Seat heights could vary from 380mm, 480mm or 580mm from the ground. A height of 480mm would be suitable for most users. |
| 10 | Picnic tables |  | Three picnic tables are provided which allow groups to sit and eat together. | At least one of these should accommodate wheelchair users with a bench cut-out.<br> |
| 11 | Path and road surfaces | | Noted that the main walking path has a smooth and level surface. | This is good practice. |
| 12 | Water Fountain | | No provision noted | Consider provision of a water fountain to be accessible to both standing and wheelchair users at height of 750-850mm with lower level built in bowl for dog drinking. |

| | Element | Photo | Assessment of feature | Recommendations |
|---|---|---|---|---|
| 13 | Play area | | Two play areas are proposed separated by a circulation path and entered via a gate at each end of the path.<br><br>Low railings are proposed around the boundary of the two areas. | Provision of accessible seating will be useful for parents and carers to keep an eye on children and socialise with others. |
| 14 | Play equipment | | Details to be provided. | Ensure play equipment is accessible to range of children. |
| 20 | Lighting | Good external lighting is crucial is ensuring social amenity and enabling people who are partially sighted and those who have sensory/neurological processing difficulties to be able to use external environments conveniently and safely. Also critical for vulnerable groups for whom security is a key issue.<br>A general illuminance level of 50 Lux for pathways is recommended by BS 8300:2018 -1: External Environments | | |
| 21 | Management & Maintenance | Maintenance of park infrastructure to ensure a level of amenity is also essential for comfort and enjoyment of users<br><br>Maintenance of path surfaces is critical to ensure comfort and continued use, including cutting back vegetation that extends onto or over a pathway.<br><br>Regular cleaning, maintenance and updating of signage and information panels, including cutting back any surrounding planting is necessary to ensure they remain legible and up to date.<br><br>Use of the park is evolving over time and the behaviour of users needs to be monitored carefully to ensure the safety and comfort of all users. | | |

| | Element | Photo | Assessment of feature | Recommendations |
|---|---|---|---|---|
| | | Crucial for disabled people, people wheeling shopping trolleys or baby buggies is:<br>• Ensuring surfaces are maintained as smooth, firm and level, with no potholes or uneven areas<br>• Visual contrast of edges and at junctions is maintained<br>• Adequate lighting levels are maintained<br>• Ponding is immediately attended to. | | |

## 2.1 Further recommendations to increase inclusivity

The park proposals indicate at this stage that these are well designed to be inclusive and welcoming to a range of users with protected characteristics, including older and disabled people, parents, pregnant women and carers of small children.

It is suggested that further consideration be given to providing a distinct and unique cultural identity for Little Dorrit Park and Peace Garden to reflect the rich cultural and racial diversity of this area.

This would make the park an expression of local identity, provide a sense of ownership and pride, and destination to explore.

# Little Dorrit Park and Peace Garden
# Consultation Summary

Prepared for Southwark Council
by
Bankside Open Spaces Trust

February 2021

BANKSIDE OPEN SPACES TRUST

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# Little Dorrit Park and Peace Garden | Consultation Summary

## 1. Background

Bankside Open Spaces Trust (BOST) is an environmental and volunteering charity. In 2020 it celebrated 20 years of protecting, preserving and enhancing parks, gardens and other amenities in London's SE1 and surrounding areas. BOST was set up with the aim of improving people's health and wellbeing by making where they live and work greener and more beautiful.

BOST manage and maintain open spaces, welcome volunteers from both the community and the corporate sector, run regular gardening groups, support park steering groups, organise and take part in public events and educational projects, and offer advice to others. It collaborates closely with local residents and businesses to champion green spaces.

The parks which BOST help to manage, have won more than 32 awards, including the UNESCO Man and Biosphere award, London in Bloom Champion of Champions and the MPGA London Spade for our community gardening partnerships.

Owing to its track record, local placement and its strong relationship with the local community, BOST were approached by Southwark Council to build on BOST's existing community network in the area to undertake consultation with local residents to understand what enhancements residents would like to see in Little Dorrit Park.

Funding for enhancements is to be provided through a Section 106 Agreement, related to the redevelopment of nearby Brandon House.

This report summarises the ideas which have been proposed by the community and local activists.

## 2. Methods of consultation

### 2.1 Direct engagement

Before the Covid-19 pandemic, Bankside Open Spaces Trust arranged a consultation event within Little Dorrit Park on 17th July 2019. It was advertised by posters displayed throughout the local area via direct letters to residents and local parents through local schools. BOST staff handed fliers to parents collecting pupils from the adjacent St Josephs and Cathedral primary schools as well as Charles Dickens school on Lant Street.

The event was assisted by the fine weather. BOST offered free refreshments and ran an art and crafts table, aimed at collating children's ideas through collage and poster making. Adults were offered free herb plants in exchange for offering their comments on the existing park and their ideas and aspirations for the space in the future. The event was organised and run by one consultant, four BOST staff members and a graduate from BOST's Future Gardener's scheme.

All participants were encouraged to leave comments on post-it notes under headings. A total of 57 individuals left responses on post-it notes, along with 22 collages/posters created by children; ideas were very diverse ranging from wildlife areas, ziplines, trampolines, carousels, a funfair to flying popcorn machines! Some of these young artists' pictures have been included in the appendices.

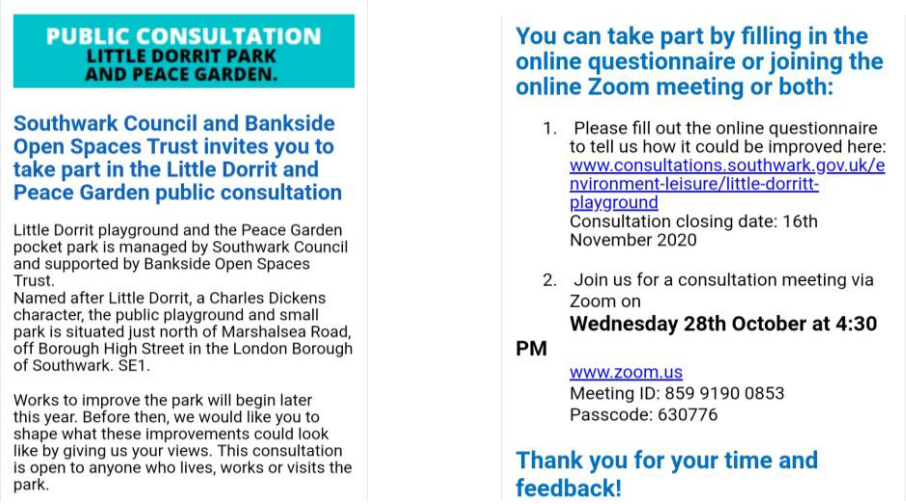
Participants were also invited to the join the Friends of Little Dorrit Park (FOLD), established by BOST.

FOLD is intended to act as the hub for distributing information locally and will provide a forum for the evolving design process.

Following the initial consultation responses, Southwark Council met with BOST to discuss the results. It was agreed that further consultation was required in order to capture a wider audience of existing and potential park users.

## 2.2 Online virtual consultations

Owing to Covid-19 restrictions, BOST undertook two virtual consultation sessions using the online Zoom meeting platform on 28th October and 18th November 2020. The meetings were announced via BOST and Southwark Council's websites as well as via BOST's community network, social media and the Friends of Little Dorrit Park steering group. A downloadable link suitable for smartphones and other digital devices was used. Two online meetings were held in October and November 2020. BOST intended to hold another online meeting for parents and carers or to join local schools' online PTA meetings but this was unfortunately not possible to arrange. The Zoom presentation is included in the appendices.



**PUBLIC CONSULTATION**
**LITTLE DORRIT PARK AND PEACE GARDEN.**

**Southwark Council and Bankside Open Spaces Trust invites you to take part in the Little Dorrit and Peace Garden public consultation**

Little Dorrit playground and the Peace Garden pocket park is managed by Southwark Council and supported by Bankside Open Spaces Trust.
Named after Little Dorrit, a Charles Dickens character, the public playground and small park is situated just north of Marshalsea Road, off Borough High Street in the London Borough of Southwark. SE1.

Works to improve the park will begin later this year. Before then, we would like you to shape what these improvements could look like by giving us your views. This consultation is open to anyone who lives, works or visits the park.

**You can take part by filling in the online questionnaire or joining the online Zoom meeting or both:**

1. Please fill out the online questionnaire to tell us how it could be improved here: www.consultations.southwark.gov.uk/environment-leisure/little-dorritt-playground
   Consultation closing date: 16th November 2020

2. Join us for a consultation meeting via Zoom on
   **Wednesday 28th October at 4:30 PM**
   www.zoom.us
   Meeting ID: 859 9190 0853
   Passcode: 630776

**Thank you for your time and feedback!**

The 1.5 hour Zoom meetings were hosted by the Head of BOST's Parks and Community Team, one in the afternoon and one in the evening for participants' convenience. Participants were thanked for giving their time. The background to the park was explained; Little Dorrit playground and the Peace Garden pocket park is managed by Southwark Council and supported by Bankside Open Spaces Trust. It is named after Little Dorrit, a Charles Dickens character. The novel is about Amy Dorrit also known as Little Dorrit who was born and raised in Marshelsea Prison which used to be located just across Borough Road from the park.

It was explained that Section 106 funds had already been secured for the park but the total amount had yet to be confirmed and so participants' ideas and views would help determine the amount required. Works to improve the park and Peace Garden would likely begin in 2021. But before then, BOST and Southwark council wanted to gather the views of people who live and work in the area. It was emphasised that owing to the relatively short time for the meeting (1.5 hours), not all views would be able to be heard fully enough and therefore participants were urged to fill out the online questionnaire, so that BOST could get each participant's personal, in-depth views. Participants were invited to email their views to the BOST team as well.

Participants were shown views of the park and pictures of the general layout. It was emphasised that the whole layout of the park might be changed, not just park furniture and so participants were encouraged to 'think outside of the box'. Participants were asked initially to fill in and submit a poll. Then individual elements of the park were discussed in discussion groups under the following headings:

- **Play equipment:** did participants like the play equipment? Is it outdated? Would participants like more natural play equipment? Is there enough play equipment for certain age groups? What other suggestions did participants have?
- **Access and boundaries:** how could the layout of the park be improved? For example, should the children's play equipment be in an allocated area? Should there be a separate area for adults? Could the borough road entrance be more welcoming such as opening it up and taking down the fence? Could the alleyway be widened or incorporated into the park? Is better lighting or surfacing needed?
- **Benches:** did participants want to see more or less benches? Did they like the picnic style benches?
- **Greenery;** would participants like more plants and trees and more landscaping of the park?

- **The Peace Garden:** how could the garden be improved? Did participants like the mosaic? Dogs are allowed in the peace garden but not in Little Dorrit Park as it's a children playground. Did participants like this as a separate dog area? Should it be bigger or smaller?

Participants were thanked and reminded to fill out the online questionnaire.

## 2.3 Online surveys

As well as the Zoom meeting consultations, local residents were invited to fill out an online questionnaire (see web link used above). The closing date for the questionnaires was 16th November 2020 and BOST allowed 3 weeks for consultees to respond. Both BOST and Southwark Council promoted the consultation via their website, newsletters and social media platforms such as Facebook and Twitter. The questionnaire is included in the appendices.

## 2.4 Door-to-door questionnaires

Although BOST was not able to interact with people owing to Covid-19 restrictions, staff members invited local residents to participate in the consultation process by dropping questionnaires through doors at Pattison House, Babbington House, the Disney Street estate and Brandon House. Staff wore masks and gloves, maintained social distancing and followed Covid-19 guidelines to post questionnaires through doors and avoided face to face interaction. The Tenants and Residents Associations were contacted as well in case staff were not able to access blocks in order that the information could still be shared with residents. Paper form questionnaires could be filled in at residents' convenience and dropped through the Red Cross letter box. The box was marked with a sign saying. '***Little Dorrit Questionnaires. Please post here. Thank You.'***

There was also an option on the paper form to join the Zoom meetings and fill in the online questionnaire from the links on BOST's and Southwark Council's websites. In addition, the consultation was advertised on posters and leaflets which were installed and distributed in park notice boards, local shops, local estates and businesses. Posters are included in the appendices.

# 3. Consultation responses

It was clear that the most successful methods of consultation were via face-to-face interaction in the park (57 consultees) and via the online questionnaire (65 consultees). Following the completion of the four forms of consultation, the responses were collated and the following results produced.

## 3.1 What people like

*"In 2002 I installed ten bronze plaques in the west corner of the park and I often stop to assess their condition."*

*"The drinking fountain should remain to encourage the reduction in plastic bottles."*

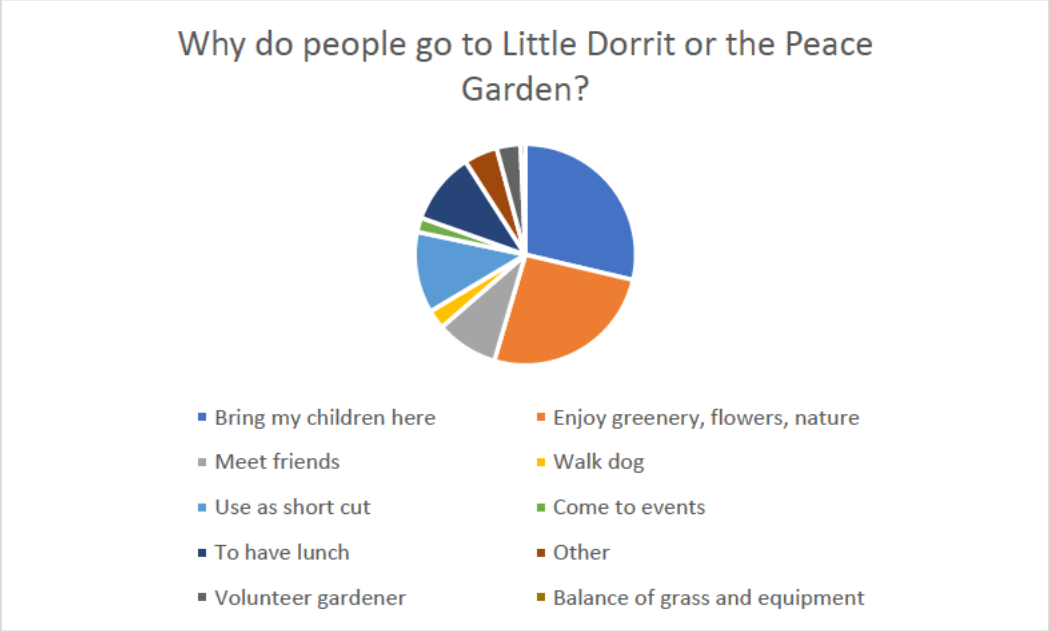
*"It's one of the best parks for under 5s in North Southwark"*

*"...the Peace Garden area is incredibly valuable to myself and many other local dog owners...Being enclosed means that a dog can be allowed to explore safely without interacting with any strangers (canine or human)....More and more I see dog restrictions in place across Southwark... contrary to what a large part of the community actually needs... safe, well maintained, enclosed dog exercise areas... a gate that securely closes and bins for poo bags... separate from people, paths and children's play areas...many locals have found the Peace Garden as the perfect safe place to take a solitary bench stop on a dog walk...due to COVID and lifestyle changes we need you to consider that local dog owners (many of which are vulnerable people) rely on the safety and security of this tiny gated Peace Garden for a peaceful dog walk... for those of us who have no children or no family, our pet is often our*

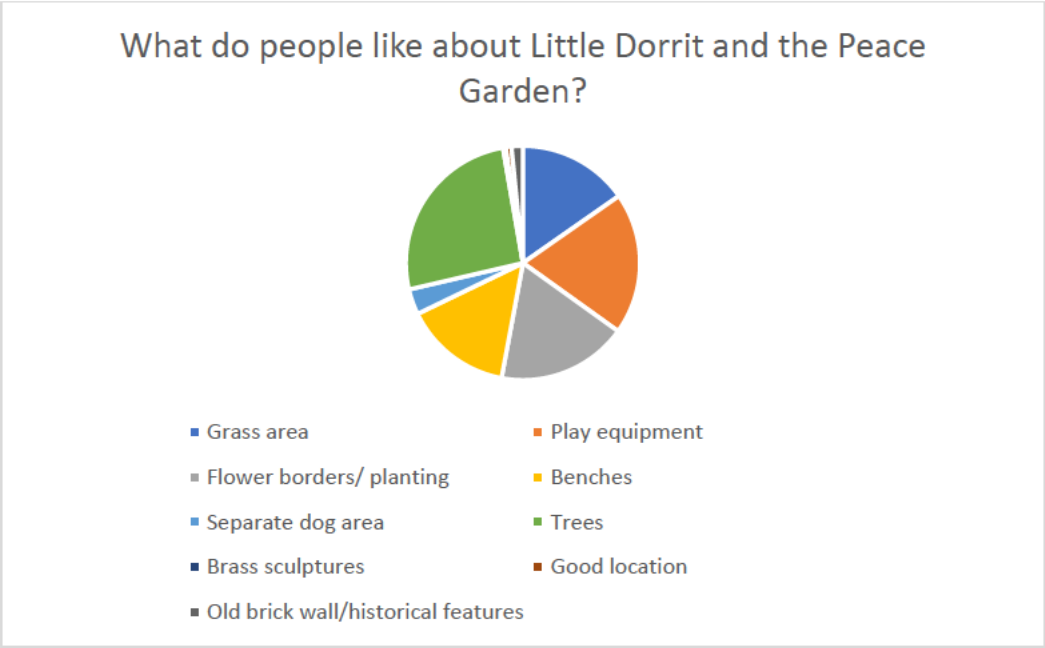
*"The trees are lovely and I can see and appreciate the efforts made in Little Dorrit Park by gardeners."*

*"Current patchwork fencing has its charm and I would keep the west wall of the Little Dorrit Park for historic reference."*

Of the 65 responses via the online questionnaire, 69% respondents felt safe to very safe in the park.




Overwhelming, of the 72 respondents via zoom meetings and the paper and online questionnaires, most said that they brought their children to the park or came to enjoy greenery, flowers and nature. Although this question was not specifically posed during the July face-to-face consultation session, all the 57 consultees were parents or carers and had brought children with them. It is also apparent that having lunch at the park and using it as a short cut were key reasons for visiting.




The elements of the park which people most enjoyed were the flowers, trees, seating, play equipment and grass. However, as noted below, a large proportion of respondents also felt that these should be improved and made some suggestions. A few people felt that the benches, although welcome, were in the wrong location or orientation. One person felt that the seating might pose a problem (possibly seen as attracting street drinkers) and asked for no more seating but this was the only exception. Certainly the protection of trees was very important to people, although a few advocated a little management of them to introduce more light at ground level especially along the dark alleyway adjacent to the park. From the survey narrative, it was clear that only 7 respondents were dog owners but the majority of respondents liked that the area was separate from the play area.

One respondent who was a dog owner gave a detailed response about the importance of having separate areas for dogs to be walked: *"More and more I see dog restrictions in place across Southwark… local dog owners (many of which are vulnerable people) rely on the safety and security of this tiny gated Peace Garden for a peaceful dog walk… for those of us who have no children or no family, our pet is often our sole companion."*

One respondent acknowledged that the fencing and boundary treatments needed addressing but wanted see the walls of the garden preserved 'for historic reference.'

## 3.2 What people dislike

*"I don't like having street drinkers in the park...people are clearly buying and selling drugs…"*

*"…there is a lack of shelter…it's impossible for children to play on a sunny day…"*

*"I don't like the street drinkers using the bushes as a toilet…often in front of the children…there are no toilets so children all wee in the bushes!"*

*"The surfacing is worn…the tarmac is disintegrating…it makes scrapes worse than they need to be…"*

*"The play space is outdated and not really child friendly…."*

*"The fencing is worn and ugly and doesn't really serve any purpose…people can easily climb over after dark…"*

*"The Peace Garden….and dog area… people don't always want to sit there as others might think they are watching the children…please create area that doesn't overlook play areas"*

*"The L-shape of the park makes it difficult for parents to keep an eye on their children…"*

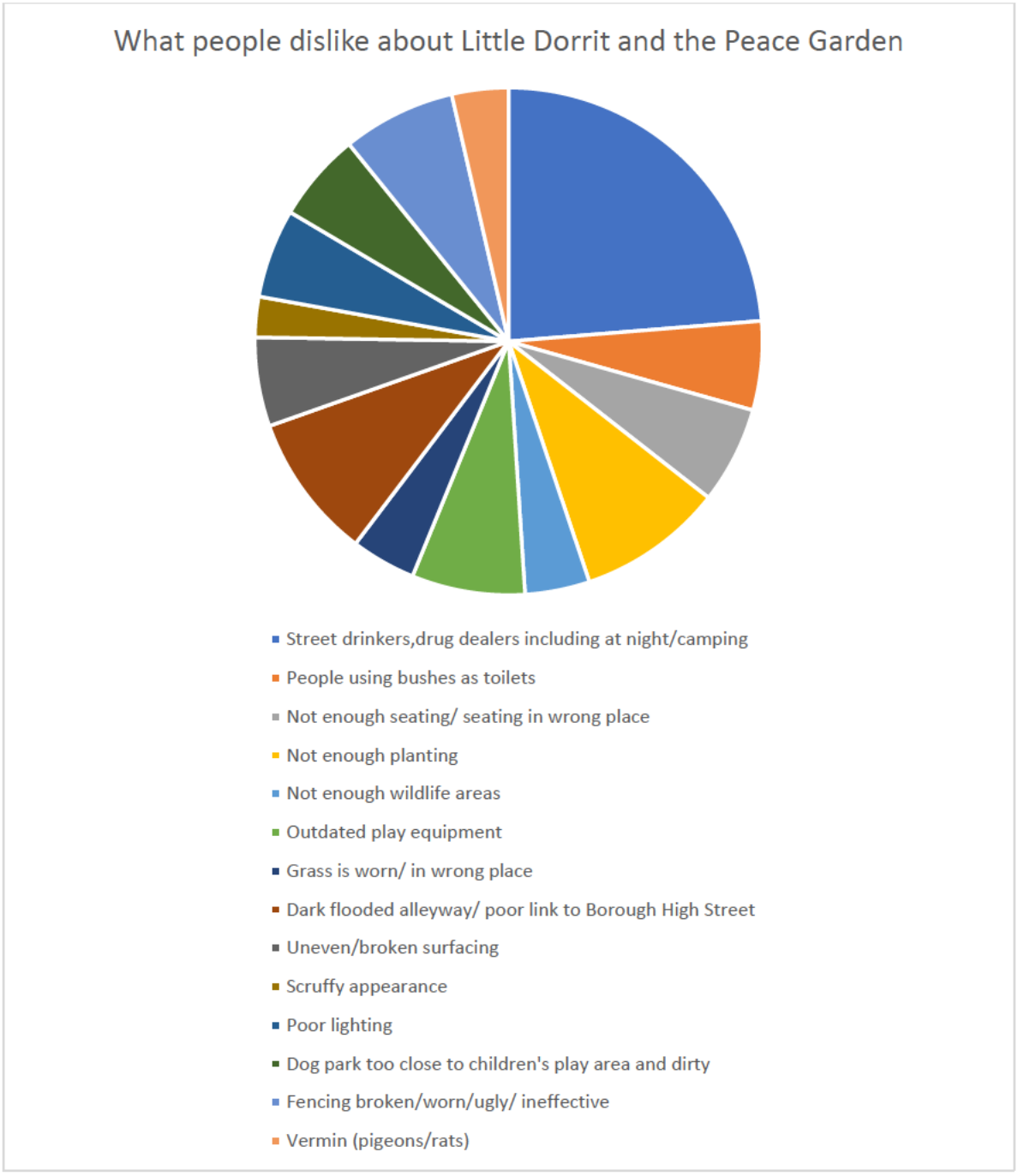
*"The park doesn't feel safe or clean…."*

*"…dogs walking into the park….intimidating and unsafe in general for children who play there."*

*"I haven't been for a while but there is sometimes a tent pitched and it is not a nice alleyway to walk down in the dark, I do cycle down it but it isn't friendly after dark.."*

*"I do not like the alleyway that leads alongside the park… very ugly and grey… I feel very closed in. When I walk down it in winter on my way home it is very dark and as narrow feel no escape routes. It is not a nice entrance to the Park. The area just off Borough High Street also needs to be opened up and some nicer planting, maybe take the walls down, as just an unused space at the moment."*

Despite the number of positive responses (89) about the existing state of the park, there were almost as many (87) responses to the 'dislike' question and more diverse responses, indicating that there are many issues to address. As well as the comments summarised in the chart below, other responses were that: the flow in the park was poor (3), recycling and other bins were needed (3), it was too busy at lunchtime (3), and there was insufficient shelter from the sun (2). There was frustration from 6 respondents as "*there are no toilets*" leading to people "*urinating in the bushes*." Of the 65 consultees responding via the online questionnaire, 29% felt unsafe in the park.




Across all consultation methods, the resounding concern (almost 25% of all respondents) was around the presence of street drinkers and drug dealers in and around the park. The narrative within the online questionnaire revealed that many people felt the fence was ineffectual since people simply broke into the park at night; one respondent called for the fence to be removed. The alleyway adjacent to the park was felt to be a poor route, especially at night and one respondent within the questionnaire narrative wrote that

"*…the Park and Garden feel dystopian, worn, and uncared for. It also feels unsafe to visit alone, as a single woman. The Garden has a bizarre sunken pit (dried up paddling pool??), and uneven paving which is a safety hazard in terms of tripping. The Park has play equipment, which is great - but the equipment there is old, and looks well past its best. I would like to use the space more, but currently only really visit as a cut-through to walk other places, as why would I linger in such a depressing, unsafe place?*".

Many respondents described this poor link from the High Street (9%) as well as the poor lighting in this area (6%) and also referred to the out-of-date play equipment (7%).

Many respondents whilst enjoying the greenery, flowers and nature in the space, did not feel that there was enough of it (13% respondents) and wanted more varied wildlife habitats, as described in detail by one respondent:

*"Anything that reduces the area available to planting e.g. hard standing, sand. The amount of greenery in Southwark has been reduced drastically (e.g. there's much less grass around Elephant Park/Heygate Street than there used to be) and that's to its detriment. Ground feeding birds like sparrows and blackbirds (with their beautiful song) are denied their natural habitat, hedgehogs have nowhere to live…"*

The dog area within the Peace Garden, whilst recognised as needed, was felt by some to not be in the correct position. People sometimes felt it attracted '*miscreants*'. Others who used it to relax felt uncomfortable as it was situated so close to the play area:

*"…people don't always want to sit there as others might think they are watching the children…please create area that doesn't overlook play areas…"*

There was an underlying theme within the consultation responses that the layout of the park needed overhauling since there are currently conflicting uses, poor sightlines and the park feels '*disjointed.*' The surfacing both in the park and along the alleyway was seen as problematic and a hazard.

## 3.3 Ideas people have for improvements

*"Very important to build upper body strength in kids as there is good opportunity for hanging (doing monkey bars) and climbing."*

*"It could be vastly improved by taking a more natural approach to the play equipment… wooden climbing structures and bark on the ground. This would be a more welcome green space retreat in an otherwise quite built up area than it is at present. More could also be done to make the grassed space more inviting with tables, tree trunks etc."*

*"It would be nice to have the pathway through to the High Street next to the playground better lit and better paved..."*

*"The train and some of the other equipment is too challenging and a bit dangerous. But I wouldn't like it to go too far in the other direction where the play structures are too abstract. Keep it fun for little kids. GMH Park by the Imperial War Museum is a good example."*

*"Better connection to Borough High Street and that part of park better utilised and connected to rest of park..."*

*"The alley is called birdcage alley – should maybe have a design feature of birdcages…"*

*"I think a playground should stay but needs updating and should also incorporate other facilities such as more focus on plants and maybe growing vegetable spaces for the kids so it can also be educational / linked to the school?."*

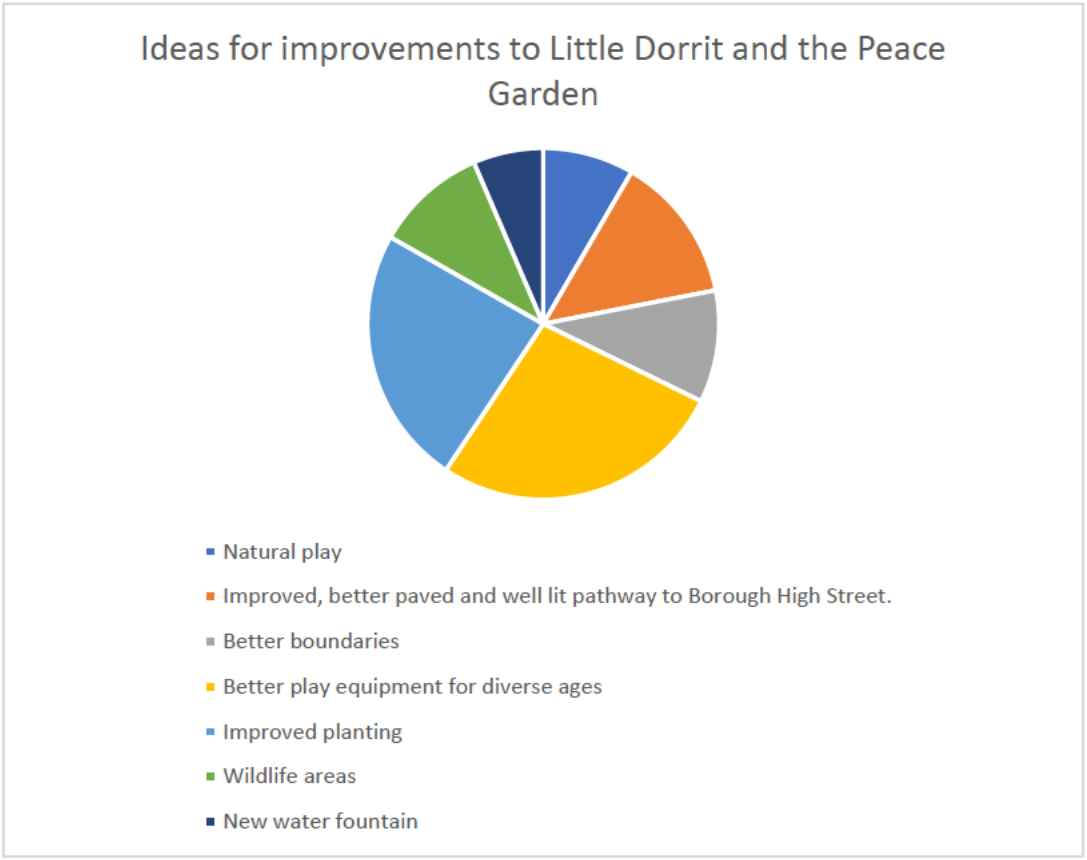
*"The aesthetics of the park need to be improved. At present lots of different colours that are not pleasing to the eye. A more natural play area with natural colours such as greens and wooden play equipment would be nice. More of a natural theme. Flooring more of a homogenous colour or matching colours. Too many contrasting colours at moment.."*

As well as the responses above and those summarised in the chart below (155 responses in total), other responses included:

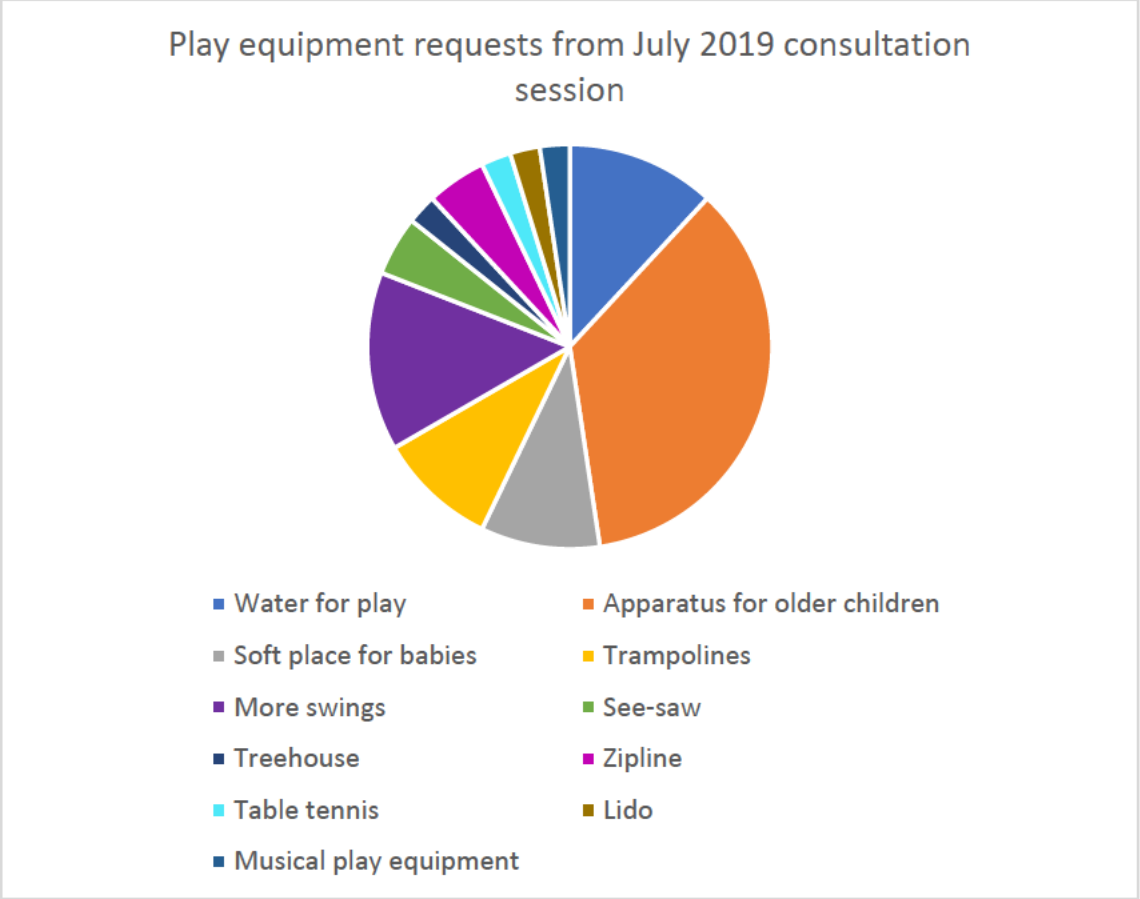
Less hard-standing (1), trampolines (5), table tennis (1), and making the mosaic more of a feature. Two consultees wanted to ensure that the historical elements of the park (such as the brick wall) were preserved in the new design. Others also wanted new and contemporary style fencing and boundary treatments. One respondent requested CCTV as they felt that it would discourage anti-social behaviour. More trees were requested by 6 respondents and a nature/history trail was requested by 5 respondents.

During BOST's Zoom consultation sessions, participants were shown local examples of parks to inspire discussion and ideas generation. Participants within these sessions liked features within King Stairs Garden, the water feature on Hatton Way which served as an important ecosystem and the different levels used in Mint Street park. Nearby Brandon House residents thought better lighting was need but were concerned about light pollution. They also wanted to ensure that any new design did not bring the play area closer to homes. Residents at Brandon House also wanted the gate, which separates their residences from the park, to be kept locked.

Overwhelming, most responses featured on the need for more play equipment for a variety of ages (27% of responses) and improved planting (24% of responses). In addition to new play equipment, there were specific requests from 8% of respondents for natural play features. Interesting, when the 57 respondents in July 2019 were asked about which play equipment they would specifically like to see, 36% requested equipment for older children, compared to just 4% of respondents in the November 2020 online questionnaire (coincidentally both had the same number of respondents).



In the July 2019 on site consultation, participants were very specific about the types of play equipment they would like. Apparatus for older children (e.g. climbing equipment, trampolines, bigger slides and ziplines) was the most requested. 'Soft spaces' for babies were mentioned several times as were water for playing and more swings. A few respondents also asked for table tennis, a treehouse, a see saw and basketball.




The other non-play related requests included an improved, better paved and well-lit pathway to Borough High Street (14% of responses), better boundaries and wildlife areas (requested by 10% of respondents), and 6% of respondents requested new drinking fountains.

The BOST team's impression having undertaken the consultation, is that in general many visitors are uncomfortable that adults have to walk through the kids area to eat lunch, meet friends etc. People generally felt that 'if you don't have kids you shouldn't be there.' This aspect needs to be addressed as part of the design stage; the space should be able to perform a variety of functions without making visitors feel unwelcome or uncomfortable.

# 4. Conclusion and next steps

Participants in all consultation sessions appeared to come to similar conclusions. There is consensus across respondents that the following criteria are used when designing Little Dorrit and the Peace Garden:

- Improve the play equipment for children of diverse ages and consider alternatives such as natural play;
- Create new planted areas, wildlife areas and improve the condition of the grass;
- Better layout of the spaces to improve flow and sightlines – this may also serve to reduce conflict between users, ensure that the space works for all and that visitors made to feel welcome and comfortable irrespective of whether they are visiting the garden with children, are wanting to find a quiet solitary space for reflection, are walking their dog, eating lunch with colleagues etc;
- Improve boundary treatments and access to and from the High Street – participants specifically requested that any new design should also encompass the alleyway and improve routes to and from the park;
- Improve lighting;
- Incorporate historical elements/ a nature/ history trail within the design;
- Surfacing needs addressing;
- Maintain a separate dog area and an area for adults without children which does not overlook the play space(s);
- Consideration of nearby residents' homes and the balance between improving the community offer and lighting, whilst preserving residents' peace

The next stage - creating a concept design - needs consideration. BOST would advocate continuing to work with the community group through the Friends of Little Dorrit (FOLD) to establish a concept design which is shared with the community.

In addition, BOST have an established relationship with Ramboll, a leading engineering, architecture and consultancy company. Every year, graduate employees are giving a project to design and they like to work with BOST as they enjoy the challenge of designing outdoor spaces in consultation with the community. After the initial consultation in July 2019, the results were shared with Ramboll and they created a series of designs. Graduates are encouraged to be as innovative as possible and to 'think outside the box'. The ideas are varied and may serve as a springboard to assist the design process for Little Dorrit park and the Peace Garden. The graduates teams' designs are included in the appendices.

It is also recommended that designs adhere to the following guidance on designing public realms which has recently been published by the GLA:

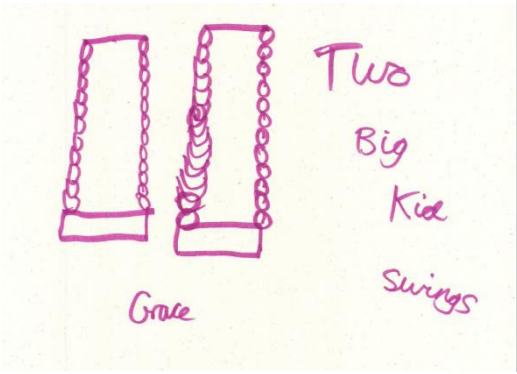
https://www.london.gov.uk/sites/default/files/expanding_londons_public_realm_combined_final.pdf

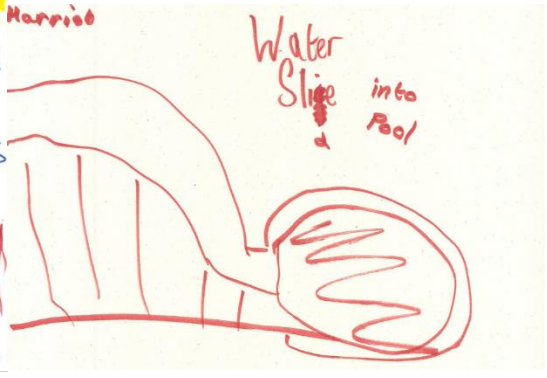
and supporting documentation, including:

https://www.london.gov.uk/sites/default/files/ggbd_making_london_child-friendly.pdf

# 5. Appendices

## 5.1 Children's ideas from July 2019 Consultation Event





## 5.2 Zoom presentations

## 5.3 Questionnaires

**15. Ethnic Background**

- White British
- White Irish
- Other White
- Black British
- Black Caribbean
- Black African
- Other Black
- Mixed White/Black Caribbean
- Mixed White/Black African
- Mixed White/Asian
- Other mixed
- Indian
- Bengali
- Chinese
- Pakistani
- Bangladeshi
- Any other Asian
- Latin American
- Traveller
- Eastern European
- Any other ethnicity

**16. Do you have a disability?**

- Yes
- No
- Prefer not to say

*If Yes, please tick the box or boxes below that best describe the nature of your impairment(s):*

- Hearing/vision
- Physical/mobility
- Mental health
- Learning disability
- Long-term illness or health condition
- Other

**17. Religion or belief**

- Christian
- Sikh
- Hindu
- Muslim
- Jewish
- Buddhist
- No religion
- Other

**18. Is your Gender Identity the same as the sex you were assigned to at birth?**

Yes No Prefer not to say

**19. Pregnancy or maternity: Are you currently pregnant and/or on maternity leave?**

Yes No

**20. Did you find this consultation clear and easy to complete?**

Very easy Easy Not sure Unclear Very unclear

CLOSING DATE 16 NOVEMBER 2020

### ALMOST DONE!

**21. If you would like to be kept up to date about the consultation and our plans to improve Little Dorrit and Peace Garden, please provide your name and email address.**

**Name**

**Email**

**Thank you for your views**

Privacy Statement: Southwark Council uses your personal data to record your response to the consultation. Section 1 of the Localism Act 2011 allows us to do this. The council does not require your permission to process your data and failure to tell us your information may mean that we are unable to process your response. Your personal information will only be used by our Parks Team and Bankside Open Spaces Trust, and will be destroyed after four years. If you are concerned about how the council uses your personal data or would like to enquire about the personal information we hold on you, please contact us via dpo@southwark.gov.uk or on 020 7525 5000. More information about your rights is available on our website, or via the Information Commissioner (www.ico.org.uk).

Bankside Open Spaces Trust. Charity No. 1085454. www.bost.org.uk

### PUBLIC CONSULTATION

# SOUTHWARK COUNCIL WOULD LIKE **YOUR VIEWS** TO SHAPE IMPROVEMENTS TO **LITTLE DORRIT PLAYGROUND AND PEACE GARDEN**

CLOSING DATE 16 NOVEMBER 2020

**COMPLETE IT ONLINE**

www.consultations.southwark.gov.uk/environment-leisure/little-dorritt-playground

**OR DELIVER BY HAND/POST TO**

Letterbox on office wall
Red Cross Garden
50 Redcross Way
SE1 1HA

BANKSIDE OPEN SPACES TRUST

Southwark Council

### HAVE YOUR SAY

Little Dorrit playground and the Peace Garden pocket park is managed by Southwark Council and supported by Bankside Open Spaces Trust. Named after Little Dorrit, a Charles Dickens character, this is a public playground, just north of Marshalsea Road and off Borough High Street in Southwark, SE1. Works to improve the park are commencing this year. Have your say to shape upcoming major future practical improvements and plans for the park. This questionnaire will help guide the long term vision for Little Dorrit alongside further consultation taking place.

## QUESTIONNAIRE

**1. Why do you go to Little Dorrit or Peace Garden?**
*Please tick all that apply*

- Bring my children here
- Enjoy greenery and nature
- Meet friends
- As a short cut
- Lunch
- Walk my dog
- Come to events here
- Never visited
- Other *(please tell us more)*

**2. What do you like about Little Dorrit Park or Peace Garden at present?**
*Please tick all that apply*

- Grass area
- Dog area
- Children's play equipment
- Benches
- Trees
- Flower borders/planting
- Other *(please tell us more)*

**3. What do you dislike about Little Dorrit Park or Peace Garden and how could it be improved?**

**4. How safe do you feel when visiting the Park?**

- Very safe
- Safe
- Unsafe *(If unsafe please explain why?)*

**5. What do you think of the play equipment at present?**

- More play equipment
- Less play equipment
- Play equipment for under 5s
- Play equipment for 5-9
- Play equipment for 10-14

**6. Would you like any particular play equipment at this site?**

**7. Which new facilities would you like?**
*Please tick all that apply*

- Mobile catering
- More benches/picnic area
- Art sculptures
- Natural play features
- More flowers/planting
- Lawn area
- Nature signage
- Signage on history
- More trees
- Recycling bins
- Fenced dog area
- Drinking fountain
- An area for adults without children
- Other *(please tell us more)*

**8. Would you like more social activities in the park?**
*Please tick all that apply*

- Wildlife activities
- Community events
- Children's play activities
- Volunteer gardening sessions to maintain the park

### EQUALITIES MONITORING

**9. Your name**

**10. Are you a:**

- Local resident
- Local business
- Representative of a community of voluntary group
- Other *(please specify)*

**11. If you live in Southwark, what is your postcode ?**

- SE1
- SE5
- SE8
- SE17
- SE19
- SE21
- SE22
- SE23
- SE24
- SE26
- Other *(please specify)*

**12. Age**

- Under 16
- 16-17
- 18-24
- 25-34
- 35-44
- 45-54
- 55-64
- 65-74
- 75-84
- 85-94
- 95+

**13. Sex**

Male Female

**14. Sexual Orientation**

- Heterosexual/straight
- Lesbian/gay woman
- Gay man
- Bisexual
- Other
- Prefer not to say

## 5.4 Posters

HAVE YOUR SAY ON IMPROVEMENTS TO LITTLE DORRIT PARK AND PEACE GARDEN.
Southwark Council wants your views to shape improvements to Little Dorrit Park and Peace Garden SE1.
Please join the Zoom consultation led by BOST:
Wed 28th October 4:30pm.
Details below. All Welcome.
ZOOM Meeting ID:
Password:
Further details or to fill out a consultation questionnaire visit:
ww.southwarkcouncil/
Bankside Open Spaces Trust, Redcross Garden, 50 Red Cross Way, London SE1 1HA. www.bost.org.uk. Charity reg: 1085454.

PUBLIC CONSULTATION
LITTLE DORRIT PARK & PEACE GARDEN
Southwark Council wants your views to shape improvements to Little Dorrit Park & Peace Garden SE1
Please fill out the online questionnaire to tell us how the Park could be improved and what you would like to see there
www.consultations.southwark.gov.uk/environment-leisure/little-dorritt-playground
Consultation closing date: 16th November 2020
Bankside Open Spaces Trust, Redcross Garden, 50 Red Cross Way, London SE1 1HA. www.bost.org.uk. Charity reg: 1085454.

## 5.5 Ramboll graduate concept design ideas

UK GRADUATE DESIGN PROJECT 2019

# LITTLE DORRIT PARK

Bankside Open Spaces Trust

## RECONNECTING THE LOCAL COMMUNITY.

GROUP 01: BEN FRAMPTON, CALLUM MACKENZIE, MAIGA WINZENREID, MAXIME LABE & WILL HARRISON

RAMBOLL

The redevelopment of Little Dorrit Park endeavours to reconnect the local community by encouraging creativity through education, events and play. Striving to preserve the green, open space, the scheme will invite children and adults of all ages to explore and make use of the park time and time again.

### Educational Mural

An educational mural will give local schools and artists the opportunities to creatively engage with the park.

### Event Space

A pavilion creates a focal point in the park with an innovative green roof. It provides a space for events, activities and where people can meet.

### Coffee Bar

The café will create revenue for BOST and encourage people to stay in the park for longer periods of time. This will greatly improves the atmosphere of the park.

### Sensory Garden Theme

The sensory theme creates a calming atmosphere throughout the park and engages all of the senses. This will attract a wide range of demographics.

### Adventure Playground

This timber play area links well with the green space and offers equipment for younger children plus a zip line and bouldering wall for older children.

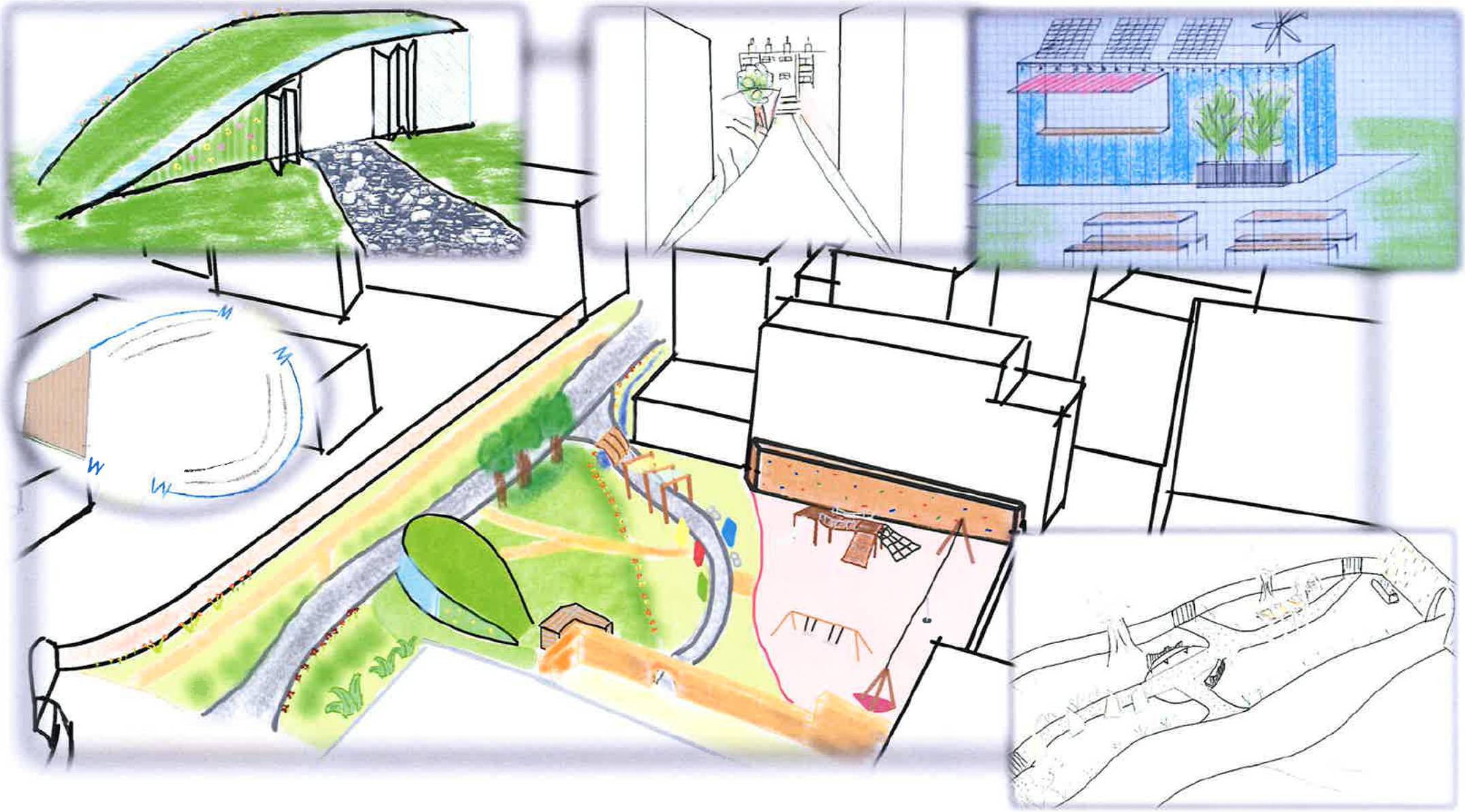
UK GRADUATE DESIGN PROJECT 2019 RAMBOLL

# LITTLE DORRIT PARK

**RECONNECTING THE LOCAL COMMUNITY.**

GROUP 01: BEN FRAMPTON, CALLUM MACKENZIE, MAIGA WINZENREID, MAXIME LABE & WILL HARRISON

Bankside Open Spaces Trust



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# THE STREET

## FOR A BETTER-CONNECTED COMMUNITY

GROUP 02: STEVE BROWN, CLAUDIA ALVARENGA, CHI WAN, WILL HURRELL, CIAN GRACE, TINA BURTON

Bankside Open Spaces Trust

RAMBOLL

The **Little Dorrit Park** Redevelopment Project is an opportunity to create an open, biodiverse space that **connects** and **enhances** local users.

The space is located just north of Borough Underground Station, London, connecting two local schools, residential housing and amid local and global businesses alike. The **diversity** of the park's usage provides the chance to significantly impact and improve this **thriving local community**.

Through deep understanding of the local stakeholder needs, rigorous studies into **site constraints** and multiple iterations of layout topography and **sun path analysis**, we have developed a scheme that **maximises site potential** – "The Street."

The Street is a green walkway lined with trees and canopied by lights. At The Crossing a series of arches constructed from **sustainably sourced timber** form a **social hub** where all park users can connect.

The park and amphitheatre are locked during the night to **enhance security**, with the street left open and well lit.

At Ramboll we pride ourselves on being truly **client-centric**; and so we devised a **strategic phasing plan** to ensure that "The Street" is a sustainable and commercially viable design.

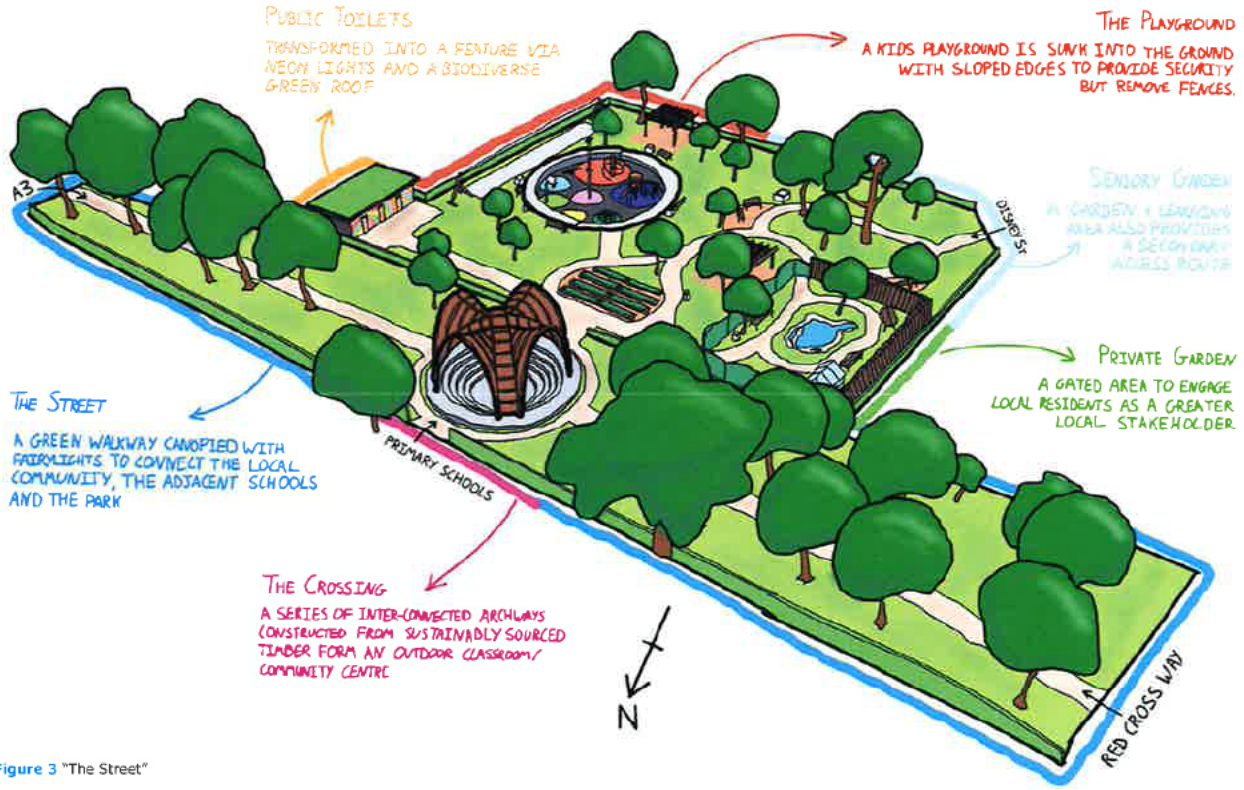


Figure 3 "The Street"

### Better Connected, Better Together

Figure 1 Site Constraints

Figure 2 Design Layout Concepts

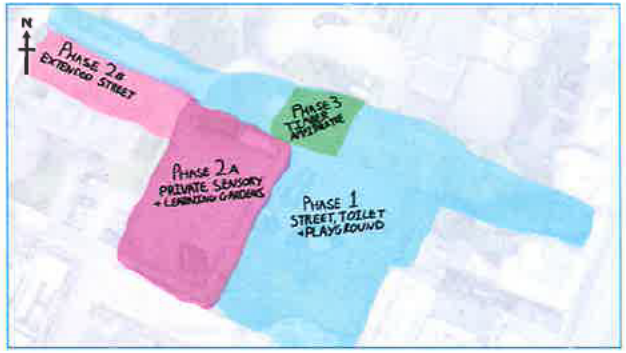


Figure 4 Strategic Phasing Plan

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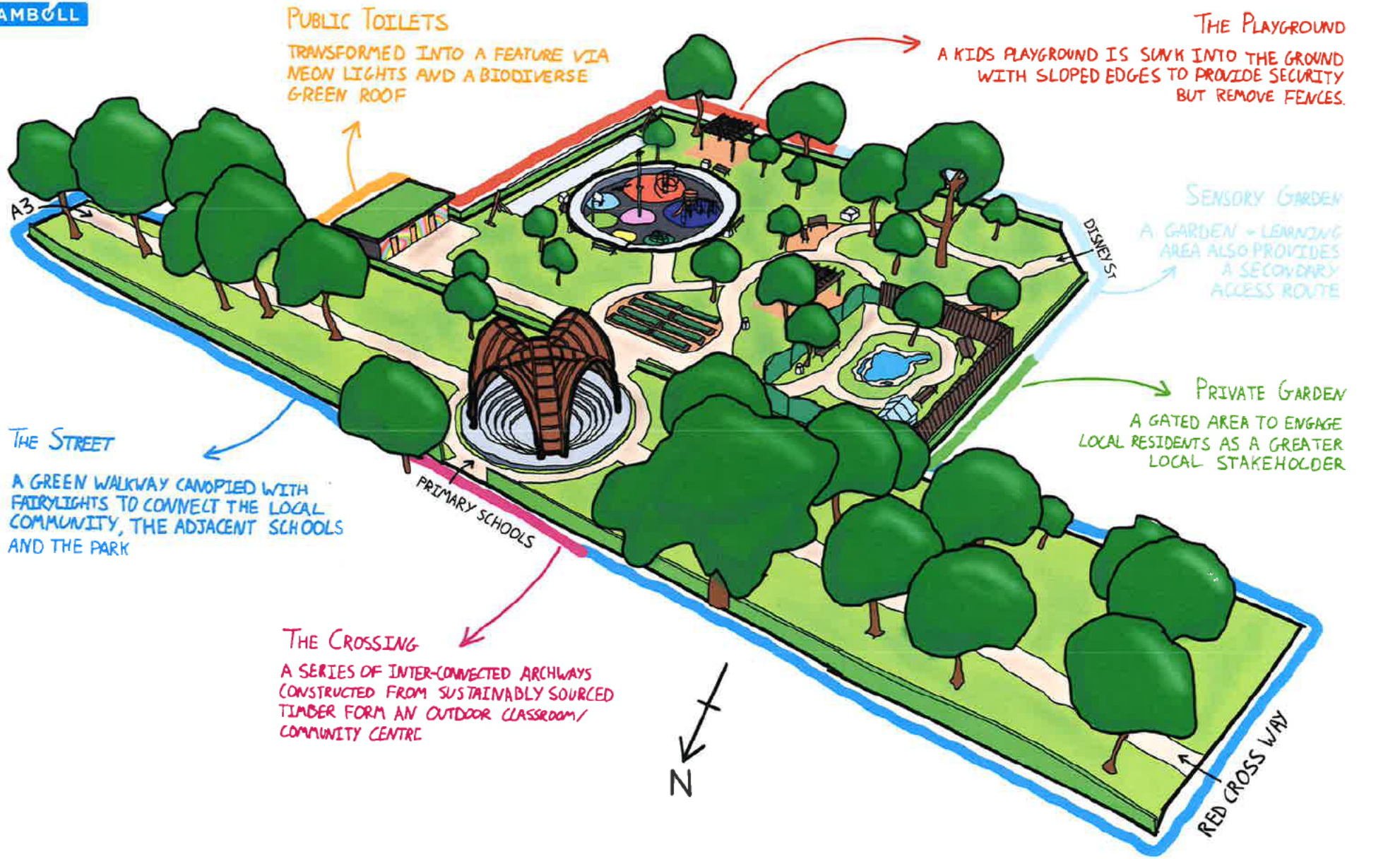
# THE STREET

## FOR A BETTER-CONNECTED COMMUNITY

GROUP 02: STEVE BROWN, CLAUDIA ALVARENGA, CHI WAN, WILL HURRELL, CIAN GRACE, TINA BURTON

RAMBOLL

Bankside Open Spaces Trust



UK GRADUATE DESIGN PROJECT 2019

# LITTLE DORRIT PARK

AN ENTERTAINING ECOHAVEN IN THE HEART OF LONDON.

GROUP 03: JULIA THOMPSON, FRED BROWN, JACK RUSHTON, JODIE HANNAH, DAVID FOX, TOMASZ CIESIELSKI

RAMBOLL

Bankside Open Spaces Trust

## OUR VISION

To create an **educational** and **entertaining ecohaven,** encouraging **wildlife** to return to this busy corner of London and bringing the **community together**.

**Core Issues:**

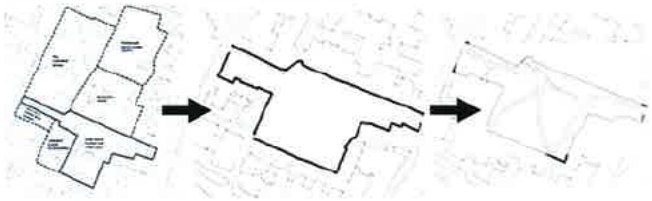
ANTI-SOCIAL BEHAVIOUR

CLEANLINESS AND LACK OF AMENITY

UNTAILORED TO USERS AND COMMUNITY

**Early Design Considerations:**

We have **reshaped** Little Dorrit Park to improve **cohesion** and maximise the use of space. This was achieved by expanding into Cathedral School Hardstanding and Babington House Gardens to **open up** the park and ensure full control of entrances to **increase safety and security**.



The **'Everybody's Business' Southwark Plan** encourages projects that support **healthy** and **active children**, to help tackle the prevalent issue of overweight young children in the area.

Education through biodiversity and sustainability, whilst maintaining a fun and stimulating playground with responsibly procured materials supports the **UN Sustainability Goals** below. These goals are the foundations of sustainable development in the 21st century.

The playground area has been designed to be sympathetic with our vision statement; **wooden materials** have been selected to maintain a **natural environment**. Southwark Council encourage **heritage-led regeneration.** The original **train**, **wall** and **Little Dorrit gate** will be retained and made into **central features** of the park, supporting the ecohaven theme we aim to achieve.

Design detail from the **gate** will also be incorporated into features throughout the park to bring **cohesion** throughout the design.

**Park security** has also been a key design consideration and we propose to **lock the park overnight** (10pm-6am), unless an evening event is taking place. As well as incorporating **appropriate lighting** to **avoid 'dark corners'**.

**Regular events** would be encouraged, focusing on the those which are either **educational** (e.g. nature - using the garden) or those tailored towards an **active lifestyle** (e.g. community and school litter picks).

## OUR DESIGN

### Play Spaces

The central park and wooden adventure trail encourage active play in a safe environment. Seating has been strategically located to ensure that parents and guardians can keep watch of their children.

### Garden

'Wild Corner' aimed to encourage wildlife, while providing educational opportunities for the neighbouring schools and residents, such as composting and biodiversity. We envisage an interactive walking route through the garden, with education boards on how to identify the local wildlife and plants. Shade-tolerant species such as roses, sunflowers, buddlejah and daisy will be planted in areas of low light.
Incorporating the original wall and gate as a feature of the garden will create a sense of heritage and shared history amongst park users.

### Dog Walking

A designated area for dog walking will be introduced, this area will feature stone paw prints along the ground and will be separated by a low hedgerow to prevent a feeling of segregation and to introduce an important habitat refuge for wildlife.

### Communal, Open Space and Amenity

A pop-up café unit caters for users of the park, as well as providing a source of revenue and indirect security. This shall be located in the well-lit north-west area. Tiered seating areas have been designed which include space for planting and artwork produced by the local pupils and residents. Innovative and effective waste, recycling and dog waste bins shall be provided around the park.

We aim for Little Dorrit park to become a central hub of activity, where nature can flourish.

UK GRADUATE DESIGN PROJECT 2019

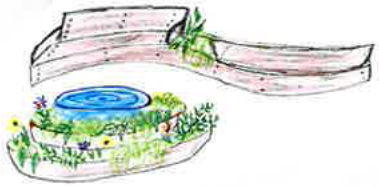
# LITTLE DORRIT PARK

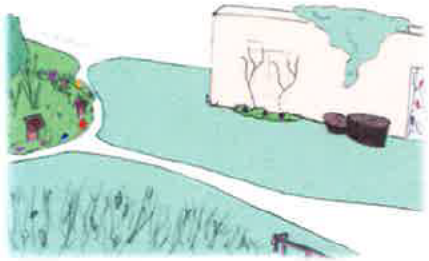
**AN ENTERTAINING ECOHAVEN IN THE HEART OF LONDON.**

GROUP 03: JULIA THOMPSON, FRED BROWN, JACK RUSHTON, JODIE HANNAH, DAVID FOX, TOMASZ CIESIELSKI

RAMBOLL

Bankside Open Spaces Trust





UK GRADUATE DESIGN PROJECT 2019

# LITTLE DORRIT PARK

## EVENT HUB FOR THE SOUTHWARK COMMUNITY

Bankside Open Spaces Trust

RAMBOLL

Little Dorrit park has been providing its diverse array of users with outdoor space in the South of London since 1902. Located just off Borough High Street the park is a welcome escape to the community from the quick pace of London.

Little Dorrit Park will be a literature addition to the BOST park network in the Southwark area with the influence of Charles Dickens.

### Design Goals

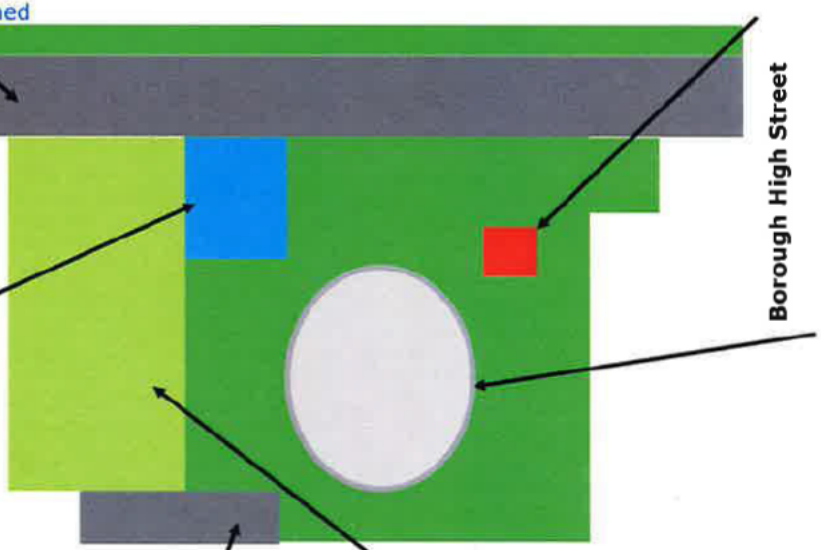
- Integration –inclusivity for both schools
- Sustainability –biodiversity enhancement, use of recyclable materials
- Education- promote lifelong learning, appreciation of the history of the park
- Safety- open spaces, reduction of anti-social behaviour

### Parks Overshadowing Issues:

### Our Vision

An adaptable space which provides for all users while creating revenue for the site. **The park will have an adaptable centre piece, theatre in summer and ice rink in winter.** This will be at the heart of the park with surrounding seating, playpark and community library in the less shadowed area of the park. The concrete and hard paving will be reduced and the park opened up with limited fencing- apart from to the secured outdoor education area.

Keeping the current through way across the park, re-pathed with recycled materials



Light tunnels and display will create a feature at night to attract visitors and provide security at all three entrances

Community Library/Book Swap and relaxed seating

Summer Theatre for community use, with opportunity for a Dickens Festival

Revenue will be generated for the site through the 4 month winter ice rink

Cathedral school hard course, becomes a secured outdoor educational area for surrounding schools with self-built structures – such as a Wikihouse

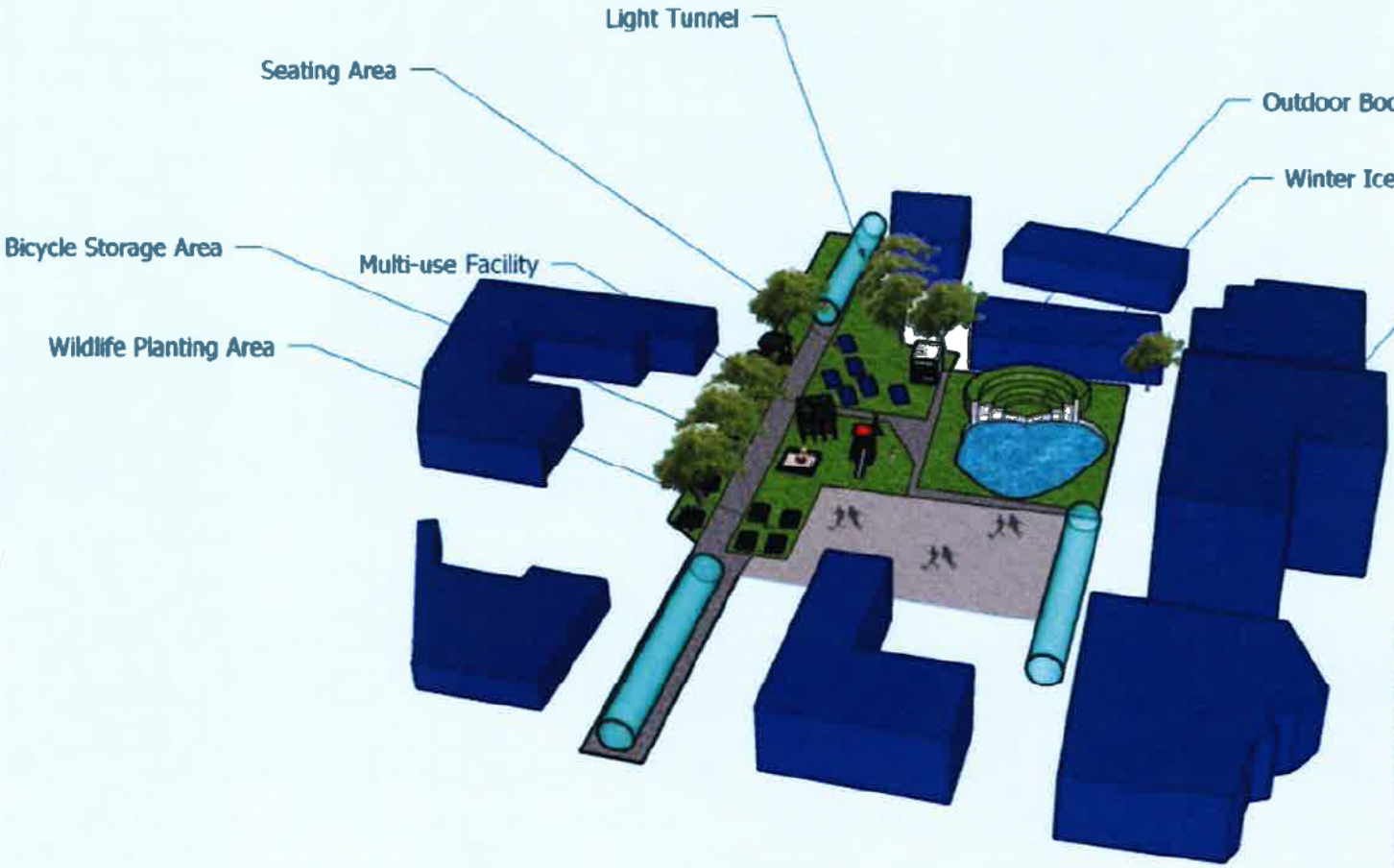
UK GRADUATE DESIGN PROJECT 2019

# LITTLE DORRIT PARK

**EVENT HUB FOR THE SOUTHWARK COMMUNITY**

RAMBOLL

Bankside Open Spaces Trust




Summer Outdoor Theatre Adaption

UK GRADUATE DESIGN PROJECT 2019

# LITTLE DORRIT PARK

## A VIBRANT, INCLUSIVE, AND EDUCATIONAL PLAY SPACE

GROUP 05: BROGAN MACDONALD, LAURENCE SHOTLIFF, LENE MARIE ROGNAN, MICHAEL TRUBSHAW, REBECCA RABY-SMITH

RAMBOLL

Bankside Open Spaces Trust

The proposed redevelopment of Little Dorrit Park creates an inclusive, educational and welcoming social environment for all by providing:

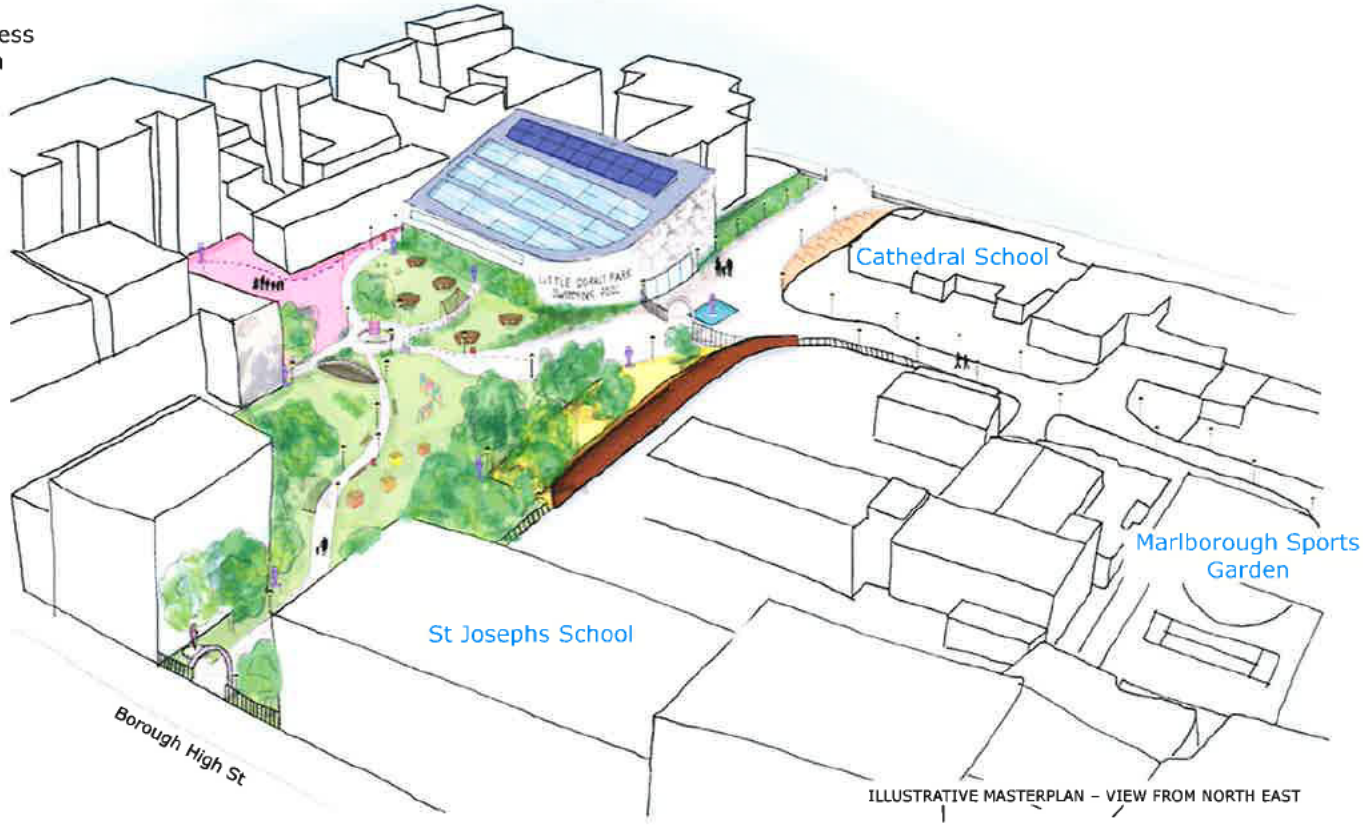
- ✓ Inclusive and accessible playground supporting children on the autism spectrum
- ✓ Sensory garden - promoting multi-sensory experiences for all ages and abilities
- ✓ Charles Dickens Treasure Hunt allowing children to explore, play and read about the rich heritage of the site
- ✓ Swimming pool for public and school use
- ✓ Greater permeability through the area with access to both schools and Marlborough Sports Garden

### KEY DESIGN THEMES

### PHASED REDEVELOPMENT

Phase 1 – Existing Park & Northern Access

Phase 2 – Long-Term Sustainable Masterplan




ILLUSTRATIVE MASTERPLAN – VIEW FROM NORTH EAST

# LITTLE DORRIT PARK REDEVELOPMENT

Follow Amy Dorrits needle & thread around the park to discover Dickens characters

Swimming Pool

Sensory Garden

Inclusive Playground

Educational Treasure Hunt

LITTLE DORRIT PARK SWIMMING POOL

Cathedral School

St Josephs School

Malborough Sports Centr

Borough High Street

**Increased Accessability**

**Phase 1**

**Phase 2**

RAMBOLL

UK GRADUATE DESIGN PROJECT 2019

# LITTLE DORRIT PARK REGENERATION

## AN INCLUSIVE AND SUSTAINABLE PUBLIC SPACE FOR THE LOCAL COMMUNITY

GROUP 06: REGGIE CLARK, PATRICK EDWARDS, LIAM KELLY, QIXIAN ZHANG

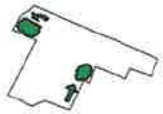
RAMBOLL

Bankside Open Spaces Trust

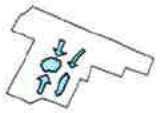
### The Masterplan

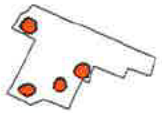
### Inclusive Design

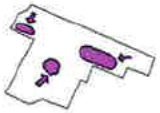
The park is designed based on these six themes to be accessible to all, particularly those with the greatest need for a public space. For people with Autism, the park can provide a free, safe space that carers will find invaluable.

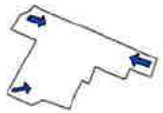

Escape

Exercise


Occupation


Sensory


Social


Transition

### Key Stakeholders

**Evening Users**
Dog walkers
Exercise groups
Local residents

**Local Schools**
Children
Parents
Teachers

**Casual Visitors**
Tourists
Local residents
Passers through

**Lunchtime**
Office workers
Parents
Local residents

### Personal Spaces

A balance between large open spaces and small, personal spaces is key for a multi-use and diverse public space.

Elevated path

Wildflowers

Pond

### Recreational Space

Conservation of the recreational space is vital, and it can be improved through relocation and introduction of sustainable aspects.

Recycled tyres flooring

Play area

Water pumps

### Biodiversity and Sustainability

The park presents a great opportunity for introducing biodiversity to Borough and sustainability can be celebrated in the park.

Vertical Garden

Transparent beehive

Recycling

### Education and Heritage

Interaction between the schools and the park is encouraged through incentives, for the benefit of the local school pupils.

Mini-beast hotel

Amy Dorrit statue

Vegetable patch

### Community Interaction

Community interaction provides incentive and purpose to the park as well as providing real social value to the local community.

Interactive community wall

Central dome

goodgym
Volunteering

UK GRADUATE DESIGN PROJECT 2019

# LITTLE DORRIT PARK REGENERATION

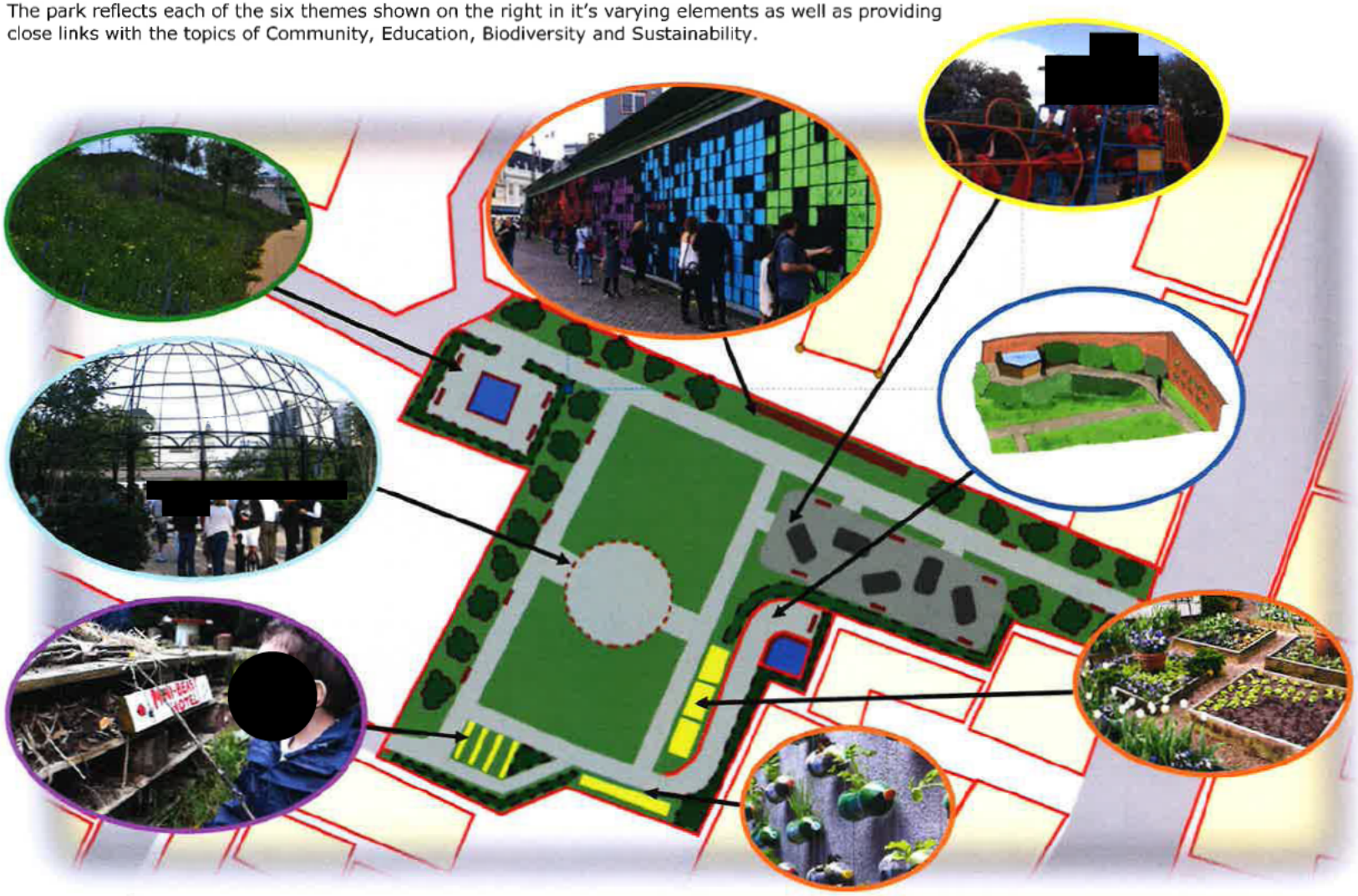
**AN INCLUSIVE AND SUSTAINABLE PUBLIC SPACE FOR THE LOCAL COMMUNITY**

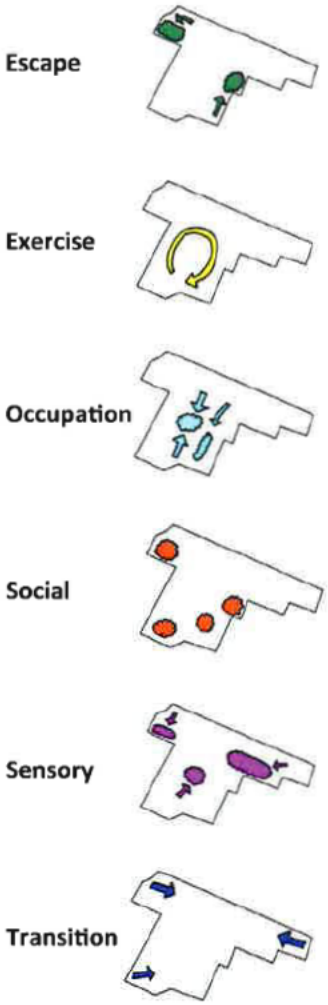
GROUP 06: REGGIE CLARK, PATRICK EDWARDS, LIAM KELLY, QIXIAN ZHANG

Bankside Open Spaces Trust

RAMBOLL

The park reflects each of the six themes shown on the right in it's varying elements as well as providing close links with the topics of Community, Education, Biodiversity and Sustainability.





UK GRADUATE DESIGN PROJECT 2019

# LITTLE DORRIT PARK

## AN URBAN GREENSPACE FIT FOR PURPOSE

GROUP 07: AHMAD TALEB, BECKY RAE, GIANLUCA PILATI, SAM MARSH, TIM PUCKERIDGE

RAMBOLL

Bankside Open Spaces Trust

Our aim is to enable the maximum use of the space available to us, whilst maintaining a strong focus on value for money in terms of new directives and demographics for the park, whilst keeping in mind the parks purpose and heritage

## Foundations for Design

### Children's Facilities and Safety

- A children's play park will remain a key feature of Little Dorrit, constructed around the original park wall, in the SW section of the park.
- The grounds will be primarily greenspace and the play equipment will be built from natural or recycled materials where possible.
- For safety, a gated fence will surround the play area and a family picnic area will be located outside.

### The Wider Community

- The existing dog park will be transformed into an exercise and multi-purpose community area, complete with outdoor exercise equipment and a performance space.
- The exercise area will be available to use outside of the normal dusk till dawn opening hours and contain sensor or digitally controlled (i.e. through an App) lighting, so that the facilities are available to early risers, shift workers and those who prefer to use the facilities outside of peak times.
- The park will include a planted garden area that would be maintained by the local community, including the surrounding schools.

### The Lunch Space

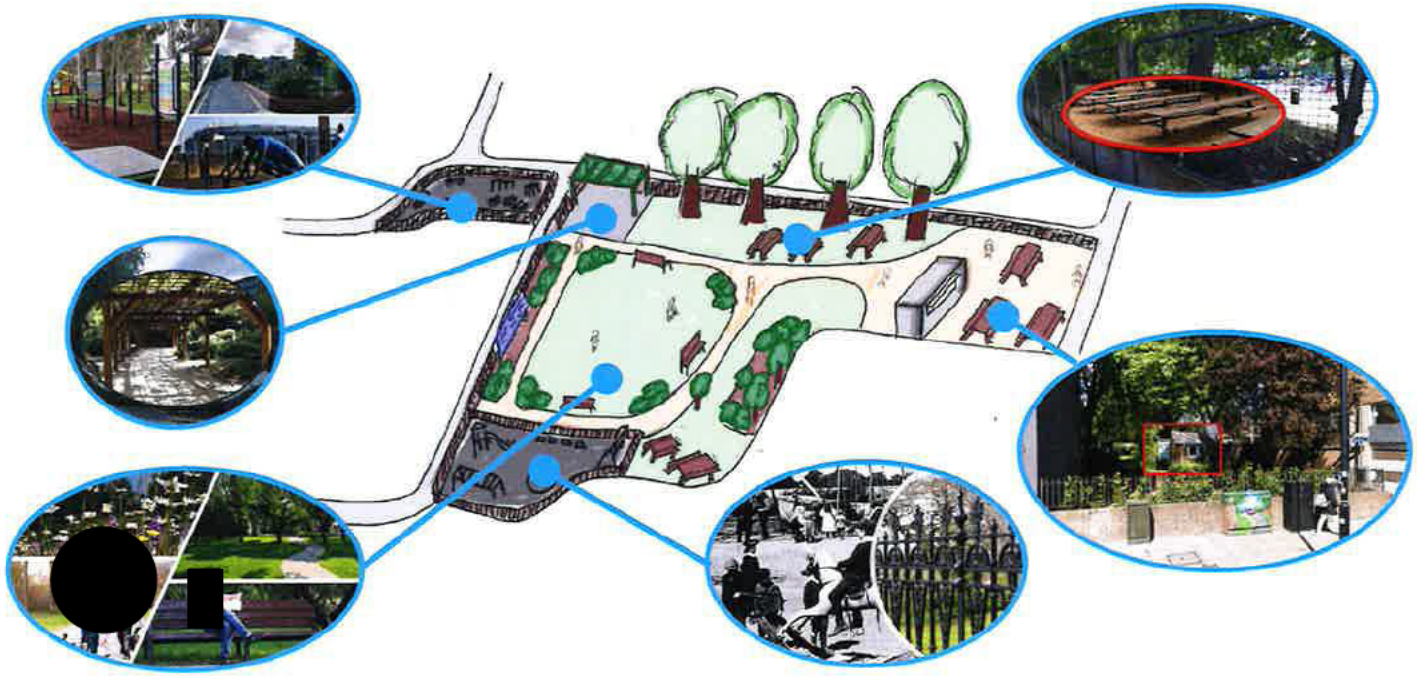
- Our design incorporates a large seating space, separate from the children's facilities, for those who live and work in the surrounding area to eat their lunch, take a break or socialise.
- Lighting and a wooden canopy, covered by greenery, ensures that the lunch area can be used in diverse array of weather conditions.

### Retail and Revenue

- The community atmosphere in Little Dorrit will be tied together with the addition of a small café, located between Broughton High St and the main park, increasing visibility for passers-by, as well increasing functionality as those using the Little Dorrit.
- The Café will provide revenue for the park through rent, operating a rotating monthly rota, as well as renting lighting solutions for the exercise and dining spaces

### Maximising Greenspace

- Our vision is to transform Little Dorrit Park into a versatile Urban Greenspace, providing an escape from the bustle of the surrounding London streets.
- A centred design around a large, open greenspace, which could be used for activities, classes, events, markets or simply a space to relax, designed to be dog friendly, an open to all users
- The periphery of the park will be lined with a planting bed, which will contain wildflowers, wildlife 'homes', feeders and information boards about them.



UK GRADUATE DESIGN PROJECT 2019

# LITTLE DORRIT PARK

## AN URBAN GREENSPACE FIT FOR PURPOSE

GROUP 07: AHMAD TALEB, BECKY RAE, GIANLUCA PILATI, SAM MARSH, TIM PUCKERIDGE

RAMBOLL

Bankside Open Spaces Trust

# LITTLE DORRIT PARK

## A BOLD IDEA

GROUP 08: ELLIE BICKNELL, PIERMODESTO CAPUTO, TOM DONNELLY, ALEX DREAVES, STELIOS KOUKAKIS, STEVE WALLS

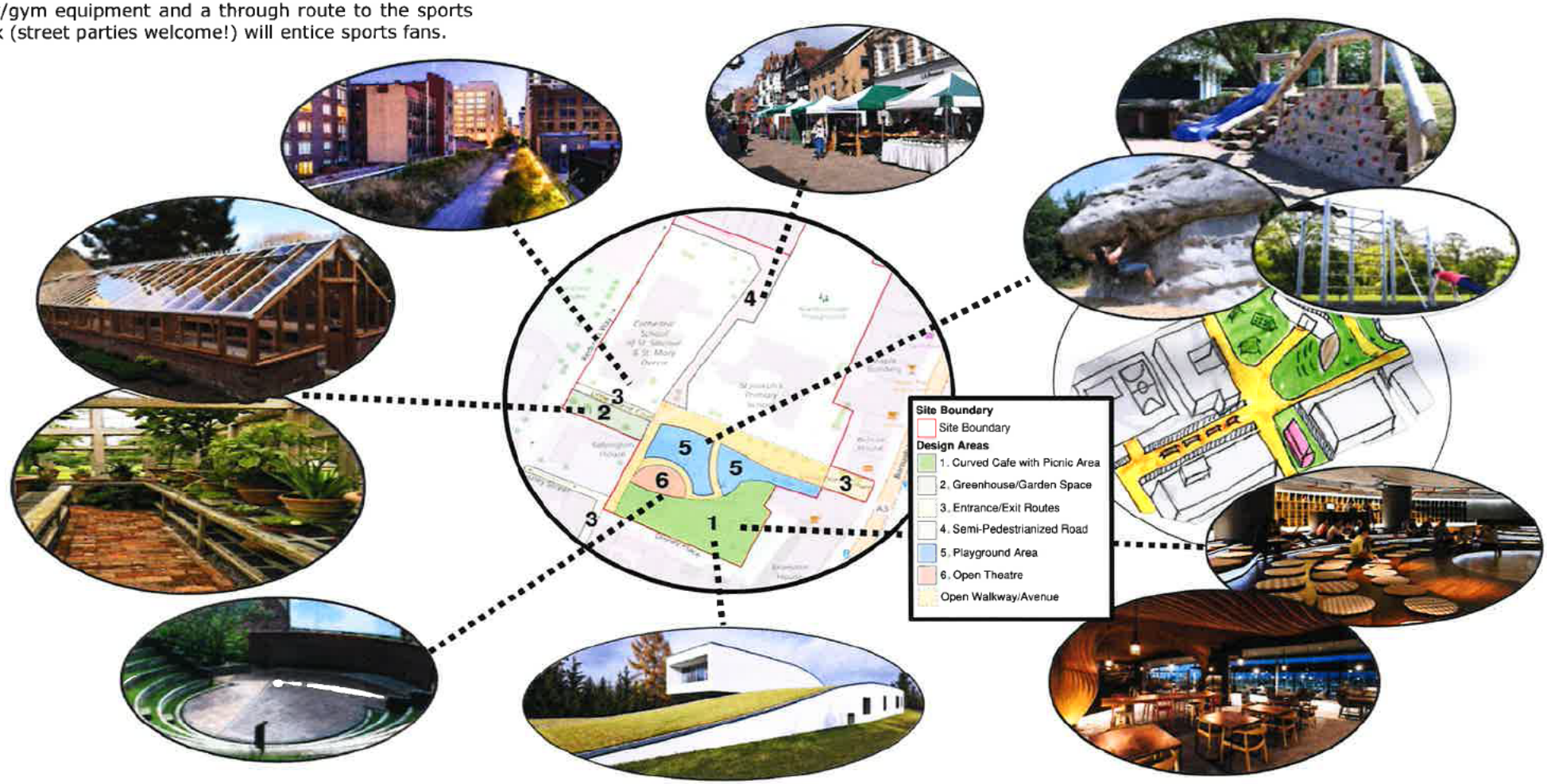
Bankside Open Spaces Trust

RAMBOLL

A bold idea! The rejuvenated Little Dorrit Park will have a little something for everyone, providing an exciting new play park for current visitors while opening the space up to the rest of the community. Encompassing everything bio-diverse, the adventure playground will be set in the sun and made from all-natural materials with greenhouse space to inspire the next generation of naturalists. An outdoor amphitheatre will get creative juices flowing, and multi-purpose play/gym equipment and a through route to the sports park (street parties welcome!) will entice sports fans.

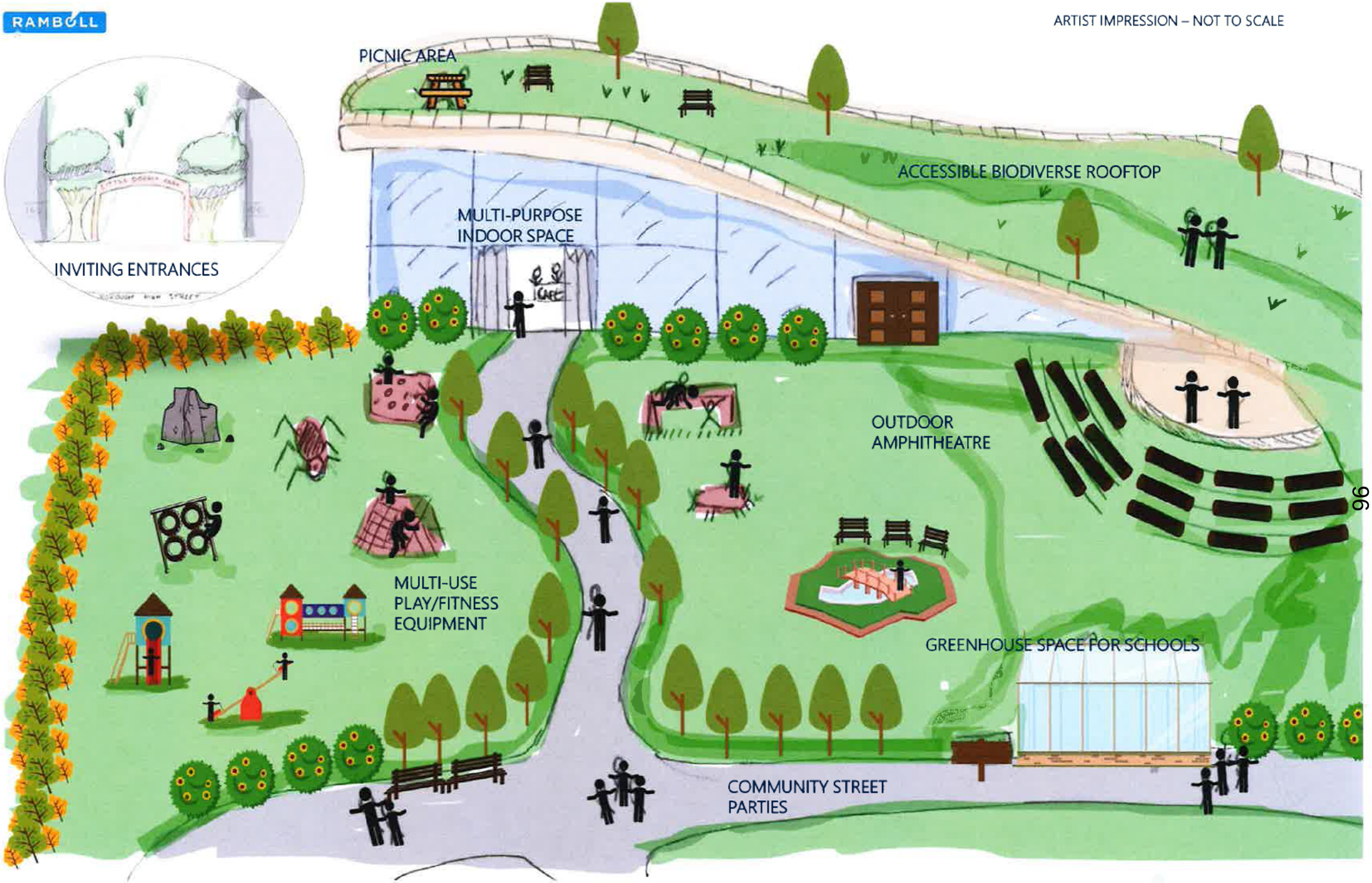
An eco-building exuding the WOW factor will form the centrepiece of the park, designed to provide inspiration and create a natural retreat from the urban environment. Inspired by natural architecture it is designed to look a part of the landscape with an accessible, bio-diverse, sloped green roof maximising usable space in the park through provision of picnic tables (and bee hotels!)

The eco-building provides a multi-functional space which can be used by the schools for putting on productions in return for loss of the playground, with the greenhouse space offering further educational opportunities! A local café will provide a social hub with space for local groups to hire for functions providing sources of revenue to put back into the park.



RAMBOLL

ARTIST IMPRESSION – NOT TO SCALE




# COMMUNITY ENGAGEMENT | EDUCATIONAL ATTAINMENT

## REVENUE OPPORTUNITIES

**APPENDIX 5**

# Little Dorrit Park Improvement Project

## Results of the Second Public Consultation

Prepared in partnership by Southwark Council
and Bankside Open Spaces Trust

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**Charity no.1085454**

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# Background

Little Dorrit Park is a small park, located in central London, not far from London Bridge. The play area is in poor condition, and needs to be replaced before it becomes unsafe. The Peace Garden is directly next to Little Dorrit Park and is included in this project.

*Above: Little Dorrit Park*

Bankside Open Spaces Trust (BOST) were appointed by Southwark Council to build on BOST's existing community network in the area and to undertake a public consultation. The consultation has engaged with the local community and park visitors, to better understand what enhancements local people would like to see in Little Dorrit Park.

The first public consultation was held in 2020 and a report on the results is available to download via the project webpage at www.southwark.gov.uk/littledorritpark

The project was put on hold in September 2021 due to staffing changes and restarted in 2022 after which the second consultation was held. This report summarises the results of the second consultation.

# Executive Summary

The survey had 59 responses which is a good response rate.

Respondents were invited to comment on two design options (see appendices 1 and 2 on pages 25 and 26 of this report).

39% of respondents did not prefer one design option over the other, which shows that there may be elements from each design that appealed to respondents. Design Option 1 was selected by about a third of respondents (36%) and Design Option 2 was less popular with 25% of respondents selecting it as their preference

*Left: The play area at Little Dorrit Park*

The location of the play area that was shown in Option 2 will be taken forward, to make sure the playground is located as far away from residential properties as possible, reducing the possibility of noise disturbance

Some people wanted to keep the current play equipment, especially the train, but unfortunately the poor condition of these items means that we cannot. Play equipment made from wood was popular, so was the slide, and these will be included. The play area will be made more accessible, increasing the opportunities for children with disabilities can play alongside their friends. Some people wanted a bigger play area, but this is not possible due to the small size of the park. Some respondents wanted more equipment for children under 5 years old, and although this will be explored, the small size of the play area limits the range of what can be provided.

Half of respondents mentioned that they felt there was a lack of provision for dogs. In the design, the amount of open space that dogs and their owners can use will be increased.

Some respondents suggested that the Peace Garden is converted into a designated dog exercise area. The introduction of a new dog exercise area is not being recommended as experience has shown that such areas are not successful, particularly in small parks.

*Right: The Peace Garden, showing the sunken area containing the mosaic*

History information boards were suggested and should funding be sufficient, they will be included in the design.

Many people liked the nature garden in the Peace Garden, and wanted more improvements for wildlife in Little Dorrit Park, and we will look at adding this to the design.

Although some people were in favour of having an outdoor gym, others felt it is not needed, because there are already outdoor gyms nearby at Mint Street Park and Tabard Gardens. An outdoor gym is no longer included.

Respondents asked for more benches and picnic tables, which will be added to the design.

Keeping the roses was important for a few people and we are exploring moving them to a better location.

Some respondents wanted lamp posts in the park. It is not recommended to add new lights to a park, as this can create a false sense of security and could lead to antisocial behaviour due encouraging people to use the park at night.

Introducing new lighting in the park is not being recommended for several reasons:

1. Lighting routes through parks creates a false sense of safety. It encourages people to walk through parks at a time when there are very few people around and visibility is poor. Trees and dense shrubbery mean that many areas beyond lit sections, remain dark and could become hiding places. In these circumstances lighting pathways has a tunnelling effect on the senses and reduces awareness and visibility of other areas of the park.
2. Parks are predominantly meant for daytime use. Lit open spaces attract night time revellers to gather causing noise disturbance to nearby residences.
3. Lighting has a negative impact on wildlife
4. The council has an ongoing commitment to tackle climate change and this includes minimising energy consumption across the borough
5. There are often clear road alternatives to cycling or walking through a park. Routes that provide better natural surveillance at night due to the proximity of shops, residences, pedestrians and road traffic.

Our maintenance team need an area to park a small vehicle when carrying out work to look after at the park. Some respondents did not like this suggestion, however there was a misunderstanding that this would only be a parking space, and no longer be a pedestrian area. We will explore the options, but if we cannot find another suitable parking location, we will make sure the vehicle area blends in with the park as much as possible. This could be by using reinforced grass so that vehicles can access the area without getting stuck in the mud.

Little Dorrit Court is an alleyway located along the northern side of the park. Some respondents asked for it to be incorporated into the park. As it is a designated as a' Right of Way', Little Dorrit Court cannot be added to the park.

Some respondents mentioned that they would like the walls to be removed, as it would make the park feel more open, and safer, and this is being explored.

Some respondents would like the mosaic removed or relocated. Should funding be sufficient, the mosaic may be removed.

The equality data that was collected shows that children and young people aged 17 and under, and older people aged 75 and above appear not to have been represented in

respondents to the survey. Young adults aged 18 to 34 also appeared underrepresented during the survey, and make up a large proportion of the local population.

People with disabilities appeared to be underrepresented in the survey responses. One respondent mentioned that they have a child with disabilities, highlighting the importance of installing new play equipment that is suitable for children with disabilities.

People from Asian and black backgrounds appeared to be underrepresented during the survey, highlighting the issue that people from ethnic minority backgrounds are less likely to put forward their views.

Christians, Sikhs and people with no religion all appeared to be well represented, when compared with the local population of Borough and Bankside ward. Some religions appear not to have been well represented; we received no responses at all from people who said they are Hindu, Buddhist or Jewish. Muslims make up 7.64% of the local population and only 3% of the people who responded and provided equalities information during our survey.

The survey appears to have been completed by more people whose registered sex at birth was female (61.5%), than people whose registered sex at birth was male (38.5%). This shows that people assigned male at birth may have been underrepresented, but does not take into account gender identity.

In Southwark, 1.2% of people identify as transgender and / or a gender identity different from their sex registered at birth. No respondents to our survey stated that they identify as transgender and / or a gender identity different from their sex registered at birth so transgender people appear not to9 have been represented at all.

Gay, lesbian and bisexual people appear to have been well represented, and people who stated they are heterosexual / straight appear to have been underrepresented in the survey respondents.

# Method of consultation

Two design options were published on the council's Consultation Hub webpage at http://consultations.southwark.gov.uk. Copies of the design options are shown in appendices 1 and 2 of this report, on pages 28 and 29.

An online survey was available between 29 September and 11 November 2022  A paper copy of the survey was also available

To ensure we reached a diverse range of local park visitors and interested parties, we provided different ways to engage in consultation process

*Above: A consultation event for Little Dorrit Park*

We ran in-person ‘consultation days’ at Little Dorrit Park and at other nearby parks, over four afternoons including a weekend. We set up in the busiest area of each park, and we also walked around the parks to encourage people to take part. Events were held on the following days, at the stated locations:

- Thursday 13 October 2022 at Marlborough Sports Garden
- Friday 14 October 2022 at Little Dorrit Park
- Saturday 15 October 2022 at Little Dorrit Park
- Thursday 20 October at Mint Street Park

We advertised using large, colourful posters displayed throughout the local area (see appendix 3 on page 30 of this report), through a social media campaign including Facebook, Twitter, Instagram and LinkedIn (see appendix 4 on page 31 of this report), newsletters, leafleting residential and business properties, emailing and posting on local websites and via the project mailing list.

The local Business Improvements District also advertised for us. In September, BOST staff delivered fliers to local schools which are the adjacent St Josephs and Cathedral primary schools as well as Charles Dickens school on Lant Street. We also gave flyers to Banana Moon Nursery. We had paper copies of the survey available to fill in, and offered help to fill in the survey.

*Left: A consultation event for Little Dorrit Park*

The in-person events were organised and run by four BOST staff members. The weather stayed relatively fine and there was a steady stream of participants. A representative of Southwark Council attended one consultation event, and the designer and their assistant joined BOST on two occasions.

At these events, all participants were encouraged to either fill in a paper questionnaire or go to the online survey. Attendees examined the designs, which were displayed on large A1-sized boards, and any questions were discussed.

Local dog owners have set up a Facebook group called ‘Little Dorrit Park Dog Owners and Dog Users’ to discuss dog-related concerns. The group has 45 members and can be found on Facebook.

# Equalities Monitoring

Equalities information was requested and respondents were under no obligation to provide the information requested. Some respondents chose not to answer some of the questions, and order to compare responses with data about the local area, those who did not respond have been excluded from the calculations, as this would make the results misrepresentative. This means that the total number of respondents to each question differs.

All equalities information is kept confidential.

We have compared the information collected with the profile of the local area, to see if anyone has been underrepresented.

**Age**

Unfortunately we had no responses from children and young people aged 17 years old and younger, or from people aged over 75 years old.

Nearly two thirds of the respondents who answered this question were aged between 35 and 54 years old.

| **Age of the respondents to the survey** | | |
|---|---|---|
| **Age** | **Number of respondents** | **Percentage (%)** |
| Under 16 | 0 | 0% |
| 16 – 17 | 0 | 0% |
| 18 – 24 | 2 | 5% |
| 25 – 34 | 6 | 14% |
| 35 – 44 | 14 | 32% |
| 45 – 54 | 13 | 30% |
| 55 – 64 | 8 | 18% |
| 65 – 74 | 1 | 2% |
| 75 – 84 | 0 | 0% |
| 85 – 94 | 0 | 0% |
| 95+ | 0 | 0% |
| **Totals** | **44** | **100%** |

We compared the age of the people responding to our survey to the age of the local population in the Borough and Bankside ward.

Children and young people aged 17 and under make up 10.3% of the local population, and were not represented in respondents to the survey.

Older people aged above 75 years old make up 3.3% of the population

Young adults aged 18 to 34 make up nearly half (47.9%) of the local population but only 18% of the people responding to our survey were in this age range.

80% of the people who responded to our survey were adults aged between 35 and 64 years old. About a third (33.7%) of the local population are in this age range, and they have been well represented during the survey.

| **Age of the population of Borough and Bankside ward from the 2021 Census estimate** | | |
|---|---|---|
| **Age** | **Number of people** | **Percentage (%)** |
| Under 16 | 812 | 9.0% |
| 16 – 17 | 115 | 1.3% |
| 18 – 24 | 2,033 | 22.6% |
| 25 – 34 | 2,278 | 25.3% |
| 35 – 44 | 1,208 | 13.4% |
| 45 – 54 | 980 | 10.9% |
| 55 – 64 | 848 | 9.4% |
| 65 – 74 | 432 | 4.8% |
| 75 – 84 | 210 | 2.3% |
| 85 – 94 | 85 | 0.9% |
| 95+ | 6 | 0.1% |
| **Total** | **9,007** | **100%** |

**Disability**

Of the people who chose to answer this question, 7% said they have a disability.

| **People with disabilities who responded to the survey** | | |
|---|---|---|
| **Do you have a disability?** | **Number of Respondents** | **Percentage (%)** |
| Yes | 3 | 7% |
| No | 39 | 93% |
| Prefer not to say | 0 | 0% |
| **Totals** | **42** | **100%** |

This is less than in Borough and Bankside ward where 13.6% of people have a disability.

| **People with disabilities in the Borough and Bankside ward from the 2021 Census estimate** | | |
|---|---|---|
| People with a disability that limits their day-to-day activities | 1,223 | 13.6% |
| People without a disability, and those who's disability does not affect their day-to-day activities | 7,790 | 86.4% |
| **Total** | **9,013** | **100%** |

People with disabilities were underrepresented in the survey responses.

We also asked people what type of disability they have. More than half of the people who answered this question stated that they have a disability related to mental health.

| **Type of disability that the respondents to the survey have** | | |
|---|---|---|
| **What type of disability do you have?** | **Number of Respondents** | **Percentage (%)** |
| Learning Disability | 1 | 14.3% |
| Physical / Mobility | 1 | 14.3% |
| Mental Health | 4 | 57.1% |
| Long-term illness or health condition | 1 | 14.3% |
| **Totals** | **7** | **100%** |

**Ethnic Background**

A fifth of people (20%) chose not to answer this question, which is a large proportion and could affect the accuracy of the data.

| **Ethnic background of the respondents to the survey** | | | | |
|---|---|---|---|---|
| **Ethnic background** | **Number of Respondents** | **Percentage (%)** | **Grouped** | **Percentag (%)** |
| Chinese | 1 | 2% | | |
| Arab | 0 | 0% | | |
| Any other Asian | 1 | 2% | Asian | 5% |
| Black British | 1 | 2% | | |
| Black Nigerian | 0 | 0% | | |
| Somali | 1 | 2% | Black | 5% |
| Mixed White/Asian | 4 | 10% | | |
| Other Mixed background | 2 | 5% | Mixed | 15% |
| White American | 0 | 0% | | |
| White British | 19 | 46% | | |
| White English | 1 | 2% | | |
| White Irish | 2 | 5% | | |
| White Polish | 0 | 0% | | |
| White Scottish | 1 | 2% | | |
| Other White | 1 | 2% | White | 59% |
| Other European | 6 | 15% | Other European | 15% |
| Other ethnic background | 1 | 2% | Other | 2% |
| **totals** | **41** | **100%** | | **100%** |

People from an Asian background make up 17% of the population in Borough and Bankside however only 5% of respondents were Asian showing that Asian people were unrepresented.

People from a black background make up 13% of the population in Borough and Bankside however only 5% of respondents were black showing at that black people were unrepresented.

People from a white background make up 59% of the population in Borough and Bankside and 59% of respondents were black showing that white people were fairly represented.

People from mixed or multiple ethnic groups make up 6% of the population in Borough and Bankside and 15% of respondents were black showing that people from mixed or multiple ethnic groups were well represented.

| **Ethnicity** | **Number of people** | **Percentage (%)** | **Ethnic group** | **Percentage (%)** |
|---|---|---|---|---|
| Asian, Asian British or Asian Welsh: Bangladeshi | 126 | 1% | | |
| Asian, Asian British or Asian Welsh: Chinese | 604 | 7% | | |
| Asian, Asian British or Asian Welsh: Indian | 370 | 4% | | |
| Asian, Asian British or Asian Welsh: Pakistani | 85 | 1% | | |
| Asian, Asian British or Asian Welsh: Other Asian | 322 | 4% | Asian | 17% |
| Black, Black British, Black Welsh, Caribbean or African: African | 783 | 9% | | |
| Black, Black British, Black Welsh, Caribbean or African: Caribbean | 249 | 3% | | |
| Black, Black British, Black Welsh, Caribbean or African: Other Black | 149 | 2% | Black | 13% |
| Mixed or Multiple ethnic groups: White and Asian | 165 | 2% | | |
| Mixed or Multiple ethnic groups: White and Black African | 87 | 1% | | |
| Mixed or Multiple ethnic groups: White and Black Caribbean | 146 | 2% | | |
| Mixed or Multiple ethnic groups: Other Mixed or Multiple ethnic groups | 183 | 2% | Mixed | 6% |
| White: English, Welsh, Scottish, Northern Irish or British | 3,175 | 35% | | |
| White: Irish | 212 | 2% | | |
| White: Gypsy or Irish Traveller | 2 | 0% | | |
| White: Roma | 54 | 1% | | |
| White: Other White | 1,850 | 21% | White | 59% |
| Other ethnic group: Arab | 115 | 1% | | |
| Other ethnic group: Any other ethnic group | 333 | 4% | Other | 5% |
| **Total** | **9,010** | **100%** | | **100%** |

**Religion or Belief**

Nearly two thirds of people who completed the survey stated they have no religion (59%). This is slightly more than the local population of Borough and Bankside ward, of which 41.97% of people say they have no religion.

| What is your religion or belief? | Number of respondents | Percentage (%) |
|---|---|---|
| No religion | 20 | 59% |
| Christian | 11 | 32% |
| Sikh | 1 | 3% |
| Muslim | 1 | 3% |
| Other | 1 | 3% |
| Hindu | 0 | 0% |
| Jewish | 0 | 0% |
| Buddhist | 0 | 0% |
| **Total** | **34** | **100%** |

People who are of a Christian religion were quite fairly represented, making up 35.6% of the local population and 32% of respondents. The Sikh religion was well represented (3%) when compared with the local population of 0.37%.

Muslims, Hindus, Buddhists and Jews were all under represented, with no responses at all from Hindu, Buddhist and Jewish people. Muslims make up 7.64% of the local population and only 3% of the people who responded during our survey.

| **Religion or faith of the population of Borough and Bankside ward from the 2021 Census estimate** | | |
|---|---|---|
| **Religion or faith** | **Number** | **Percentage (%)** |
| No religion | 3784 | 41.97% |
| Christian | 3228 | 35.80% |
| Not answered | 779 | 8.64% |
| Muslim | 689 | 7.64% |
| Hindu | 209 | 2.32% |
| Buddhist | 120 | 1.33% |
| Jewish | 78 | 0.87% |
| Sikh | 33 | 0.37% |
| Other religion: Other religions | 27 | 0.30% |
| No religion: Agnostic | 16 | 0.18% |
| Other religion: Spiritual | 12 | 0.13% |
| Other religion: Pagan | 7 | 0.08% |

| | | |
|---|---|---|
| Other religion: Spiritualist | 7 | 0.08% |
| Other religion: Jain | 5 | 0.06% |
| Other religion: Wicca | 5 | 0.06% |
| No religion: Atheist | 4 | 0.04% |
| No religion: Humanist | 4 | 0.04% |
| Other religion: Rastafarian | 2 | 0.02% |
| Other religion: Shintoism | 2 | 0.02% |
| Other religion: Own Belief System | 1 | 0.01% |
| Other religion: Satanism | 1 | 0.01% |
| Other religion: Scientology | 1 | 0.01% |
| Other religion: Shamanism | 1 | 0.01% |
| Other religion: Yazidi | 1 | 0.01% |

**Sex**

The survey was completed by more people whose registered sex at birth was female (61.5%) than those whose registered sex at birth was male (38.5%).

| **What is your sex as recorded at birth?** | **Number** | **Percentage (%)** |
|---|---|---|
| Male | 15 | 38.5% |
| Female | 24 | 61.5% |
| Other | 0 | 0% |
| Prefer not to say | 0 | 0% |
| **Total** | **39** | **100%** |

This shows that people assigned male at birth have been underrepresented in the survey respondents, when compared with the local population where female and male populations are roughly equally sized, when not taking into account gender identity which is covered in the next section.

Almost a quarter of people chose not to answer the question, which may affect the results.

| **Sex of the population of Borough and Bankside ward from the 2021 Census estimate** | | |
|---|---|---|
| **Sex** | **Number** | **Percentage (%)** |
| Female | 4,516 | 50.11% |
| Male | 4,497 | 49.89% |
| **Total** | **9,013** | **100%** |

**Gender Identity**

Of the people who chose to answer this question, the majority (97.4%) stated that their gender identity is the same as the sex they were recorded at birth.

| Is your Gender Identity the same as the sex you were recorded at birth? | Number | Percentage (%) |
|---|---|---|
| Yes | 38 | 97.4% |
| No | 0 | 0.00% |
| Prefer not to say | 1 | 2.6% |

Gender identity statistics for Borough and Bankside area are not available, and so we have used statistics for Southwark, for our analysis

In Southwark, 1.2% of people identify as transgender and / or a gender identity different from their sex registered at birth. No respondents to our survey stated that they identify as transgender and / or a gender identity different from their sex registered at birth so transgender people were not represented at all.

Almost a quarter of people chose not to answer this question, which may affect the results.

| **Gender identity of the population of Southwark from the 2021 Census estimate** | | |
|---|---|---|
| **Gender identity** | **Number** | **Percentage (%)** |
| Gender identity the same as sex registered at birth | 234,184 | 91.4% |
| Gender identity different from sex registered at birth but no specific identity given | 1,610 | 0.6% |
| Trans woman | 445 | 0.2% |
| Trans man | 466 | 0.2% |
| All other gender identities | 635 | 0.2% |
| Not answered | 18,796 | 7.4% |
| **Total** | **256,136** | **100%** |

**Sexual Orientation**

People who stated they are heterosexual / straight made up 63.9% of respondents, and 82.7% of the population of Southwark, showing that heterosexual / straight people were underrepresented in the survey respondents.

Gay, lesbian and bisexual people were well represented, making up 16.7% of respondents and 8.1% of the community of Southwark.

| What is your sexual orientation? | Number | Percentage (%) |
|---|---|---|
| Heterosexual/straight | 23 | 63.9% |
| Prefer not to say | 7 | 19.4% |
| Gay man | 4 | 11.1% |
| Lesbian/Gay woman | 1 | 2.8% |
| Bisexual | 1 | 2.8% |

| | | |
|---|---|---|
| Other (please specify if you wish) | 0 | 0% |
| **Totals** | **36** | **100%** |

Almost a third of people (29.4%) chose not to answer this question, which may affect the results

Sexual orientation statistics for Borough and Bankside area are not available, and so we have used statistics for Southwark, for our analysis

| **Sexual orientation of the population of Southwark aged over 16 years, from the 2021 Census estimate** | | |
|---|---|---|
| **Sexual orientation (6 categories)** | **Number** | **Percentage (%)** |
| Straight or Heterosexual | 211,847 | 82.7% |
| Gay or Lesbian | 11,596 | 4.5% |
| Bisexual | 6,586 | 2.6% |
| All other sexual orientations | 2,515 | 1.0% |
| Not answered | 23,592 | 9.2% |
| **Totals** | **256,136** | **100.0%** |

# The Design Options

There were two design options shown during the consultation, which can be found in appendices 1 and 2 on pages 28 and 29.

Currently, the whole park is designated as a play area, and adults without children are prohibited by the By Laws. Both designs include enclosing the play area with railings, to provide recreational space for adults without children.

The designs included better railings along the boundary with Little Dorrit Court / Birdcage Alley that would be lower to improve sight-lines, which would increase the feeling of safety. A communal space and seating area was included, which would better accommodate large groups during school rush hour, socialising and play.

We suggested to move the entrance on Borough High Street slightly, because it is not very easy to find. Having the entrance on the corner would be more visible, which would encourage people to come into the park.

The double gate connecting the park to the Peace Garden could be made more inviting, with new seats and more plants that are good for wildlife.

‘Key zones’ of activity have been identified, and the design options include:

- Improvements to the entrance on Borough High Street
- Fencing off the play area, to define it from the rest of the park
- Seats for relaxing, having lunch or a break from work

- A small garden area with seats, with the suggested name of ‘Bleeding Hearty Yard’ which is the name of the neighbourhood in the book ‘Little Dorrit’ by Charles Dickens
- An ‘open square’ between the Peace Garden and Little Dorrit Park, which will also function as a place that parents and carers on foot can drop off, or collect their children from the nearby school
- A wildlife area, where people can connect with nature
- An open lawn for picnics, football kickabouts, etc

# Summary of responses

59 people responded to the survey, 51 online and 8 filled in a paper copy

**Question 1** asked for consent for data collection, and does not need to be analysed

Design option 1 is shown on page 28

**Question 2: What do you like about design option 1?**

- 21% of respondents mentioned that they like the entrances being more open and the increased visibility of the park
- 15% of respondents mentioned that they like the suggestion to plant more trees
- 19% of respondents mentioned that they like the improved layout of the play area, because it seems more spacious and secure
- 12% of respondents mentioned that they like that the Peace Garden will remain ‘pet friendly’
- 12% of respondents mentioned that they like the fact that they play area will be enclosed with railings, meaning that the area outside of the play area will be suitable for adults to have their lunch
- 15% of respondents mentioned that they like the nature trail and biodiverse plants that are good for wildlife
- 6% of respondents mentioned that they liked the outdoor gym equipment and table tennis, but felt it was too close to the entrance

**Question 3: What do you not like about design option 1?**

- 51% of respondents mentioned that they felt there was a lack of provision for dogs in both design options
- 11% of respondents mentioned that they felt the park does not need outdoor gym equipment as the park is too small for multiple facilities. Some mentioned the outdoor gym equipment that is already located nearby
- 6% of respondents mentioned that they felt there was no need for a vehicle turning area
- 13% of respondents mentioned that they felt that the play area would be too close to residents in this option. Guidance on the recommended distance from people’s homes

has been taken into account and all play equipment will be at least 20m away from houses

- 4% of respondents mentioned that they did not like the idea of removing the rose garden
- 6% of respondents mentioned that they felt that the Little Dorrit alley should be incorporated into the design.
- 6% of respondents mentioned that they felt there is not adequate lighs in the park
- 6% of respondents mentioned that they felt there are not enough benches and seats, or that they are not positioned correctly
- 4% of respondents mentioned that they would like to keep the play equipment shaped like a train, in the play area
- 8% of respondents mentioned that they did not like the fact that trees were proposed to be removed
- 4% of respondents raised concern that Bleeding Heart Yard was too close to the play area

Design option 2 is shown on page 29.

**Question 4: What do you like about design option two?**

- 18% of respondents mentioned that they like the layout in design option two, including the improved visibility, flow and more inviting entrances and the feeling of open space
- 4% of respondents mentioned that they would like the walls to be removed, as it would make the park feel more open, and safer
- 13% of respondents mentioned that they like that the play area is located away from people's homes
- 13% of respondents mentioned that they like the fact that the play area will be enclosed with railings, and space for adults without children will be provided
- 6% of respondents mentioned that they like the larger fitness area including the table tennis

**Question 5: What do you not like about design option 2?**

- 48% of respondents mentioned that they felt there was a lack of provision for dogs
- 17% of respondents mentioned that they did not like the maintenance vehicle area because it would mean there is less space for pedestrians to use
- 10% of respondents mentioned that they felt the play area was too small or cramped
- 4% of respondents mentioned that they felt the play area was too close to the walkway and wildlife area
- 4% of respondents mentioned that they did not like losing the rose garden
- 8% of respondents mentioned that they felt the park did not need an outdoor gym, or that it could be better located

- 5% of respondents mentioned that they would like a new entrance on Disney Place, and suggested to incorporate some of the alleyways and pathways around the park, into the design
- 8% of respondents mentioned that they are worried that large bushes could be used for antisocial behaviour. The design team and the Parks operational team, will careful consider their location and species that do not grow too big

**Other feedback, which will be taken into account**

Some respondents commented that there should be more reference to local art, history and the reuse of materials already in the park. History information boards will be included in the design.

**Question 6: Which Design Option do you prefer overall?**

- 21 respondents preferred Design Option 1
- 15 respondents preferred Design Option 2
- 23 respondents were not sure or had no preference

**Question 7: What do you like about the play equipment?**

- 9% of respondents mentioned that they like the slide. The slide will be kept in the plans
- 35% of respondents mentioned that they like the natural wooden materials, and this type of equipment will be in the updated design
- 6% of respondents mentioned that they like soft surfacing, and the play area will have a soft safety surface
- 9% of respondents mentioned that they like accessible and inclusive play equipment, and designers will ensure that children with disabilities can play alongside their friends

**Question 8: What do you not like about the play equipment?**

- 11% of respondents mentioned that they feel there is not enough play equipment that is suitable for the under 5's age group.
- 9% of respondents mentioned that they think the play area designs are too busy
- 6% of respondents mentioned that they do not want garish or bright designs
- 8% of respondents mentioned that they would like more for adults and teenagers
- 11% of respondents mentioned that they would like more exciting structures and design
- 11% of respondents mentioned that they would like to keep the train
- 11% of respondents mentioned that they are concerned about the longevity and maintenance of equipment
- 6% of respondents mentioned that they would like more inclusive equipment for children with disabilities

- 6% of respondents mentioned that they do not want the park to be changed, or would prefer what is there already to be refurbished

**Question 8: What do you like about the fitness equipment?**

- 28% prefer Design Option 1
- 11% prefer Design Option 2
- 22% like a mixture of both

**What do you not like about the fitness equipment?**

- 25% of respondents mentioned that they feel the park does not need an outdoor gym, because there are already outdoor gyms in other parks nearby

**Question 9: Comments on: - The nature garden located in the Peace Garden, and the open square area between the Peace Garden and Little Dorrit Park**

- 43% said they liked the idea of a nature garden
- 11% said they did not like the schoolchildren pickup / drop off area for parents and carers on foot
- 26% of respondents specifically remarked on the ‘dog friendly area’ in the Peace Garden, and wanted it to be kept dog friendly

**Comments on: - The open lawn and wildlife retreat**

- 36% of respondents liked the open lawn and wildlife retreat
- There were concerns that there could be antisocial behaviour in this area.
- There were also comments about the seats and benches
- There were comments about wanting to have a ‘dog area’

**Comments on: - Bleeding Heart Yard**

Bleeding Heart Yard is not a place that already exists; it is shown in the design options on pages 28 and 29. It would be a new area of seats located in the southwest corner of the park.

- 48% were in favour of creating the new seating area, shown as ‘Bleeding Heart Yard’ in the design
- However calling it ‘Bleeding Heart Yard’ was not popular with everyone, and 10% of respondents suggested that the name should be different

# The Focus Group

Residents requested a further meeting to discuss the design. A focus group was set up, and officers sought to include representatives from marginalised groups including a variety of different ethnic backgrounds, people with various disabilities, women, non-binary people, transgender people, LGBTQ+ people, pregnant people, and people with various religions. This helps us understand the diverse needs of our community.

A focus group meeting was held on 28 November 2022 and was attended by twelve people. The main points of the discussions were:

- Request for details of safety improvements to alley
- Concern about new gate at Borough High Street due to relocation of roses and the risk that a more accessible, wider entrance will lead to small vehicles such as mopeds and scooters driving though the park
- Request for a new entrance to the Peace Garden to Disney Place
- Concern over maintenance vehicle area inside Little Dorrit Park
- Gym and sports equipment is not needed as these facilities are available close by at Marlboro Sports Garden, Tabard Gardens, and Mint Street Park
- Request to retain fencing for safety as it prevents children running out to road and reduces the potential for people to hide under trees next to the path leading from the entrance on Borough High Street
- The play area caters for younger children which is not available elsewhere, as other play areas nearby cater for older age groups and adults
- Rough sleeper by rose garden
- Concerns about antisocial behaviour such as excessive consumption of alcohol and drug use
- Disagree with Bleeding Heart name suggestion for Peace Garden
- Retain train
- Dogs should not be permitted in the main park, and only be allowed in Peace Garden
- Some differences of opinion about allowing adults without children in Little Dorrit Park. For example office workers having their lunch
- Concern about unimaginative play equipment e.g. timber logs
- Request for robust traditional play equipment, not logs and timber
- GMH Park given as a good example of robust traditional play equipment – not forest style
- Concern that encouraging more people to use the park could increase the amount of dog and human faeces e.g. Mint St Park which is not locked at night
- Request for more lights

- Concern about noise impacts on Brandon House residents if playground sited to south, same concern about seats
- Concern about addition of maintenance vehicle area in Little Dorrit Park
- Concern that both options are not fit for purpose

# Conclusion

Mostly, people did not have a preference between the two design options, which shows that there may be elements from each design that appealed to respondents. Design Option 1 was slightly more popular than Design Option 2.

**Play Area**

The comments showed support for enclosing the children's play area with railings.

Play equipment made from natural wooden materials was popular, and will be included in the updated design.

Respondents mentioned that they like the slide, and this will be kept in the plans.

Having accessible and inclusive play equipment is important to people, and we are ensuring that once the play area has been refurbished, there will be more opportunities for children with disabilities can play alongside their friends.

Every year, the council commissions an independent play safety inspection and report. The report from 2022 notes several issues with the train, including failing to meet the requirements of British Standard EN 1176 (British and European Standard for playground equipment and surfacing). The train has been assessed as having a life expectancy of just a few years, before it becomes unsafe to use. After this, the play area may need to be closed to the public. Therefore we are aiming to remove all of the play, and new equipment will be installed.

Some respondents mentioned that they felt the play area was too small or cramped. Making the play area larger is not possible, as the park is very small and we need to balance the amount of space for people with or without children.

More equipment was requested for very young children, under 5-years-old, and although this will be explored, the play area is too small to contain a large range of equipment for all ages.

**Noise**

Concern was raised about the potential for noise disturbance to local residents, and some respondents felt that the play area would be too close to residents in Design Option 1. The location of the play area in Option 2 will be taken forward, to locate the playground as far away from residential properties as possible, reducing the possibility of noise disturbance. Guidance on the recommended distance from people's homes has been taken into account and all play equipment will be at least 20m away from houses.

**Dogs**

Half of respondents mentioned that they felt there was a lack of provision for dogs. In the design, the amount of open space that dogs and their owners can use will be increased.

Dogs will continue to be permitted in the Peace Garden, and would also be permitted in the majority of Little Dorrit Park

Some respondents suggested that the Peace Garden is made into a designated dog exercise area. Dogs are permitted in the ‘Peace Garden’, however it is not recommended to introduce new dog exercise areas. Experience has shown that dog exercise areas can make people without dogs feel excluded, and park space is limited and needs to be shared by everyone

The majority of dog owners are responsible, and keep their dogs under control and collect their waste. Experience has shown that designated dog areas are not successful, particularly in small parks, due to a minority of irresponsible dog owners who treat these spaces as a ‘dog toilets’. Such areas quickly becomes muddy and unpleasant to visit for everyone, and are more costly to maintain due to need for additional collection of dog waste that has not be cleared by owners. By fencing off the play area, the dogs will permitted in a larger area – both in Little Dorrit Park and in the Peace Garden

**History**

History information boards were suggested and should funding be sufficient, they will be included in the design, or could be installed as part of a future project

**Nature and biodiversity**

Many people liked the nature garden (shown in the design as located in the Peace Garden), but would like more nature improvements in Little Dorrit Park. A nature garden area can be included in Little Dorrit Park and we will look at adding one to the design

It was highlighted that any new plants should not be an irritant or poisonous

**Outdoor Gym**

Although some were in favour of having an outdoor gym, more people felt it is not needed, because there are already outdoor gyms in other parks nearby**.** The park is small so there is limited space for multiple facilities. An outdoor gym is no longer included in the design

**Seats and picnic tables**

Respondents asked for more benches and picnic tables. These will be added to the design, located outside the playground Little Dorrit Park, and at least 20m from houses to reduce the likelihood of noise disturbance.

**The Rose Beds**

Keeping the roses was important for a few people. Roses are time consuming to maintain in good condition and do not provide as much benefit to wildlife as other species. Removing the roses would give our maintenance team more time to look after other areas of the park, and space for more wildlife friendly species. We are exploring moving the roses to a better location.

**Lights**

Some respondents mentioned that they felt there is not adequate lights in the park. There are currently lamp posts outside the park within the alleyways. It is not recommended to add new lights to a park, as this can create a false sense of security and could lead to antisocial behaviour due encouraging people to use the park at night. No lights will be removed as part of this project.

**The Maintenance team**

Our maintenance team need an area to park a small vehicle when carrying out work to look after at the park. Some respondents did not like the suggestion to include a space where our maintenance team can park. However there was a misunderstanding that this would only be a parking space, and no longer be a pedestrian area. The maintenance vehicle visits the park when collecting litter, looking after plants and other maintenance duties, and would not be using the space all the time. We will explore other options, but if we cannot find another suitable parking location, we will make sure the vehicle area blends in with the park as much as possible. This could be by using reinforced grass so that vehicles can access the area without getting stuck in the mud

**Little Dorrit Court**

Little Dorrit Court is an alleyway location to the north of the park. Some respondents asked for it to be incorporated into the park. Others felt that the alleyway should remain separate for commuting. Little Dorrit Court is designated as a' Right of Way' and needs to be open at all times. As the park is locked at night, the route would not be accessible if the alleyway was part of the park. Therefore, Little Dorrit Court cannot be added to the park

**Antisocial behaviour**

Some respondents mentioned that they would like the walls to be removed, as it would make the park feel more open, and safer, and this is being explored

Some had concerns that large bushes could be used for antisocial behaviour. We are carefully considering the location and species of shrubs, so they do not grow too big

**Brass Plaques**

It was suggested that the brass plaques should be kept. The brass plaques will be kept

**Mosaic**

Some respondents would like the mosaic removed or relocated. Should funding be sufficient, the mosaic may be removed to make this part of the Peace Garden accessible for people with disabilities and increase the amount of green space. The mosaic will not be relocated due to the high cost, and the need to increase the amount of green space, in line with our Climate Change Strategy

**Equalities**

Children and young people aged 17 and under were not represented in respondents to the survey. As this project is about improving a play area, we would have liked to have some responses from children.

Older people aged 75 and above were not represented in respondents to the survey. We will be careful to ensure that the needs of older people are kept in mind when carrying out the design.

Young adults aged 18 to 34 were underrepresented during the survey. Borough and Bankside has a large young adult population when compared with the rest of Southwark. It is common that this age group are less likely to respond to consultation due to pressures on their time.

People with disabilities were underrepresented in the survey responses, and it is important to consider their needs. One respondent mentioned that they have a child with disabilities, highlighting the importance of installing new play equipment that is suitable for children

with disabilities. We have carried out an Equalities Impact Assessment and wherever possible the recommendations will be taken into account.

People from Asian and black backgrounds were underrepresented during the survey. People from ethnic minority backgrounds are often less likely to respond to consultation

Some religions were underrepresented. We received no responses at all from Hindu, Buddhist and Jewish people. Muslims make up 7.64% of the local population and only 3% of the people who responded during our survey.

The survey was completed by more people whose registered sex at birth was female (61.5%), and people whose registered sex at birth was male (38.5%). This shows that people assigned male at birth have been underrepresented, but does not take into account gender identity.

In Southwark, 1.2% of people identify as transgender and / or a gender identity different from their sex registered at birth. No respondents to our survey stated that they identify as transgender and / or a gender identity different from their sex registered at birth so transgender people were not represented at all.

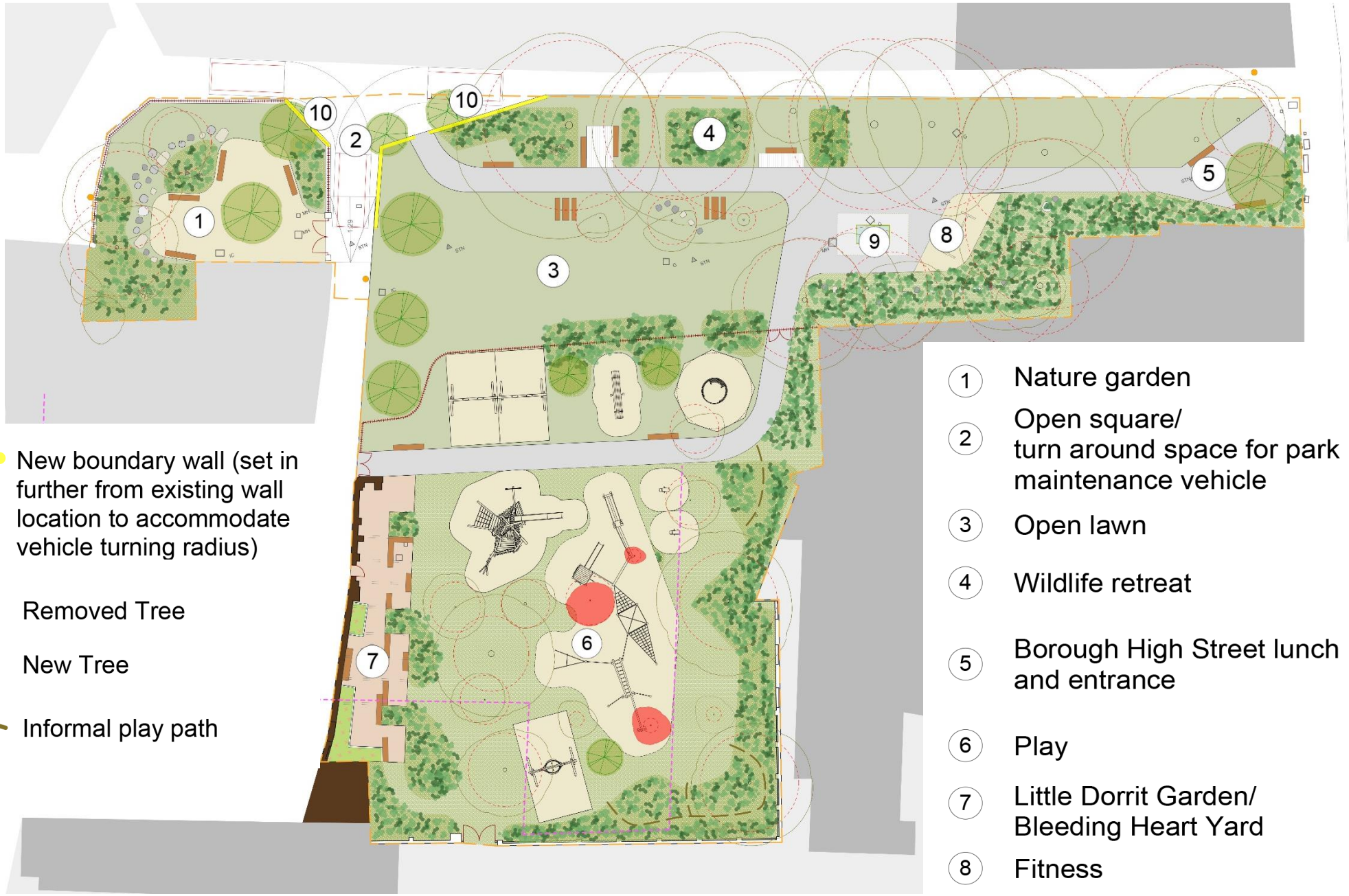
Gay, lesbian and bisexual people were well represented, and people who stated they are heterosexual / straight were underrepresented in the survey respondents. However as almost a third of people (29.4%) chose not to answer this question, the results might not be reliable.

# Next Steps

The project as put on hold in July 2023 and will be resumed once staffing resources become available. At that point an updated design will be published on the project webpage at www.southwark.gov.uk/littledorritpark

If you have any questions or would like a paper copy of this report, please contact leisureprojects@southwark.gov.uk

**Appendix 1 – Design Option 1**




10 New boundary wall (set in further from existing wall location to accommodate vehicle turning radius)

Removed Tree

New Tree

Informal play path

1 Nature garden

2 Open square/ turn around space for park maintenance vehicle

3 Open lawn

4 Wildlife retreat

5 Borough High Street lunch and entrance

6 Play

7 Little Dorrit Garden/ Bleeding Heart Yard

8 Fitness

9 Table tennis

**Appendix 2 – Design Option 2**

**Appendix 3 – Leaflet used to advertise the consultation**

**Appendix 4 – Example of social media published by BOST during the consultation**

**Bankside Open Spaces Trust** @BOSTSE1 · Nov 11

Today is the final day of the Little Dorrit Park consultation. Do add your voice to the consultation and shape this little green space's future for the whole community. Add your thoughts here: ow.ly/UEoX50LxliQ #Southwark #LittleDorrit #BoroughHighStreet

1 4

# Agenda Item 9

| | |
|---|---|
| **Meeting Name:** | Planning Committee (Major Applications) A |
| **Date:** | 2 July 2025 |
| **Report title:** | Development Management |
| **Ward(s) or groups affected:** | All |
| **Classification:** | Open |
| **Reason for lateness (if applicable):** | Not applicable |
| **From:** | Proper Constitutional Officer |

## RECOMMENDATIONS

1. That the determination of planning applications, or formal observations and comments, the instigation of enforcement action and the receipt of the reports included in the attached items be considered.

2. That the decisions made on the planning applications be subject to the conditions and/or made for the reasons set out in the attached reports unless otherwise stated.

3. That where reasons for decisions or conditions are not included or not as included in the reports relating to an individual item, they be clearly specified.

## BACKGROUND INFORMATION

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

## KEY ISSUES FOR CONSIDERATION

5. In respect of the attached planning committee items members are asked, where appropriate:

    a. To determine those applications in respect of site(s) within the borough, subject where applicable, to the consent of the Secretary of State for Levelling Up, Housing and Communities and any directions made by the Mayor of London.

b. To give observations on applications in respect of which the council is not the planning authority in planning matters but which relate to site(s) within the borough, or where the site(s) is outside the borough but may affect the amenity of residents within the borough.

c. To receive for information any reports on the previous determination of applications, current activities on site, or other information relating to specific planning applications requested by members.

6. Each of the following items are preceded by a map showing the location of the land/property to which the report relates. Following the report, there is a draft decision notice detailing the officer's recommendation indicating approval or refusal. Where a refusal is recommended the draft decision notice will detail the reasons for such refusal.

7. Applicants have the right to appeal to Planning Inspector against a refusal of planning permission and against any condition imposed as part of permission. Costs are incurred in presenting the council's case at appeal which maybe substantial if the matter is dealt with at a public inquiry.

8. The sanctioning of enforcement action can also involve costs such as process serving, court costs and of legal representation.

9. Where either party is felt to have acted unreasonably in an appeal the inspector can make an award of costs against the offending party.

10. All legal/counsel fees and costs as well as awards of costs against the council are borne by the budget of the relevant department.

**Community impact statement**

11. Community impact considerations are contained within each item.

**SUPPLEMENTARY ADVICE FROM OTHER OFFICERS**

**Assistant Chief Executive – Governance and Assurance**

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

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

14. Section 70 of the Town and Country Planning Act 1990 as amended requires the council to have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations when dealing with applications for planning permission.

15. Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that where, in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise. The development plan is currently the Southwark Plan which was adopted by the council in February 2022. The Southwark Plan 2022 was adopted after the London Plan in 2021. For the purpose of decision-making, the policies of the London Plan 2021 should not be considered out of date simply because they were adopted before the Southwark Plan 2022. London Plan policies should be given weight according to the degree of consistency with the Southwark Plan 2022.

16. The National Planning Policy Framework (NPPF), as amended in July 2021, is a relevant material consideration and should be taken into account in any decision-making.

17. Section 143 of the Localism Act 2011 provides that local finance considerations (such as government grants and other financial assistance such as New Homes Bonus) and monies received through CIL (including the Mayoral CIL) are a material consideration to be taken into account in the determination of planning applications in England. However, the weight to be attached to such matters remains a matter for the decision-maker.

18. "Regulation 122 of the Community Infrastructure Levy regulations (CIL) 2010 as amended, provides that “a planning obligation may only constitute a reason for granting planning permission if the obligation is:

    a. necessary to make the development acceptable in planning terms;
    b. directly related to the development; and
    c. fairly and reasonably related to the scale and kind to the development.

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

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

## BACKGROUND DOCUMENTS

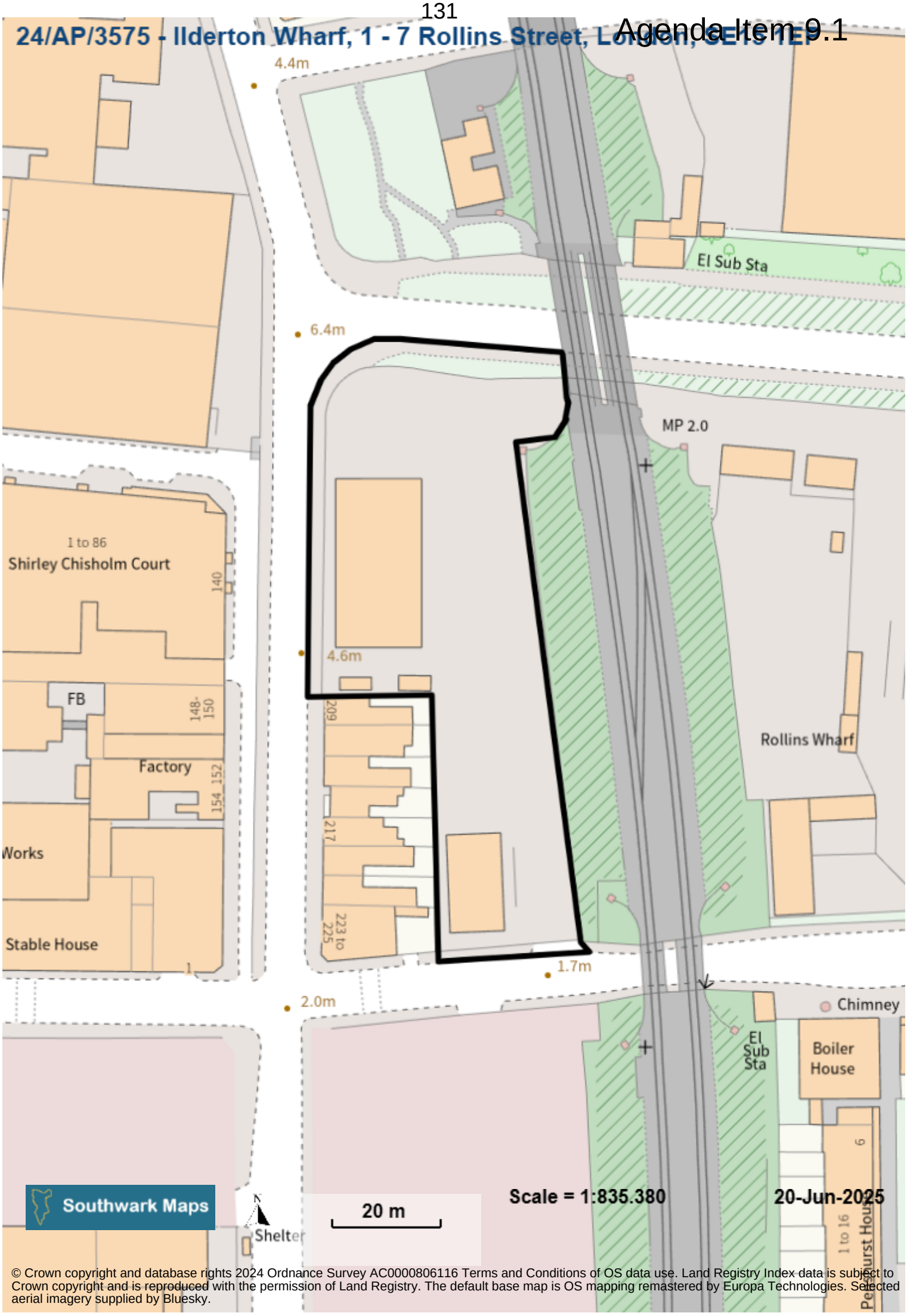
| Background Papers | Held At | Contact |
|---|---|---|
| Council assembly agenda 23 May 2012 | Constitutional Team<br>160 Tooley Street<br>London<br>SE1 2QH | Virginia Wynn-Jones<br>020 7525 7055 |
| Each planning committee item has a separate planning case file | Development Management<br>160 Tooley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

## APPENDICES

| No. | Title |
|---|---|
| None | |

**AUDIT TRAIL**

| | | |
|---|---|---|
| **Lead Officer** | Chidilim Agada, Head of Constitutional Services | |
| **Report Author** | Alex Godinet, Lawyer, Finance and Governance<br>Gerald Gohler, Constitutional Officer | |
| **Version** | Final | |
| **Dated** | 20 June 2025 | |
| **Key Decision?** | No | |
| **CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER** | | |
| **Officer Title** | **Comments sought** | **Comments included** |
| Assistant Chief Executive – Governance and Assurance | Yes | Yes |
| Director of Planning and Growth | No | No |
| **Cabinet Member** | No | No |
| **Date final report sent to Constitutional Team** | | 20 June 2025 |

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| | |
|---|---|
| **Meeting Name:** | **Planning Committee (Major Applications) A** |
| **Date:** | 2 July 2025 |
| **Report title:** | **Development Management planning application:**<br>Application 24/AP/3575 for: Full Planning Application<br><br>**Address:**<br>ILDERTON WHARF, 1-7 ROLLINS STREET, LONDON, SE15 1EP<br><br>**Proposal:**<br>Demolition of the existing buildings on the site and the construction of a linked building with a tower housing purpose built student accommodation (Use Class Sui Generis), a shoulder element housing affordable residential housing (Class C3) both with basement level, and an industrial building including affordable workspace at the southern element of the Site (Classes B2, B8, E(g)(iii), and Sui Generis), alongside the delivery of a flexible Class E unit at ground floor level, and a mixed community cafe and PBSA co-working space (Class E/Sui Generis) at ground floor level on the corner of Ilderton Road and Surrey Canal Road, in addition to the delivery of hard and soft landscaping, pedestrian and vehicle access including the provision of a loading bay on Ilderton Road, cycle parking, blue badge car parking, wider public realm improvements including new public open space, with associated highway works and all other ancillary works associated with the development. |
| **Ward(s) or groups affected:** | Old Kent Road |
| **Classification:** | Open |
| **Reason for lateness (if applicable):** | Not Applicable |
| **From:** | Director of Planning and Growth |
| **Application Start Date**: 06 December 2024 | **Application Expiry Date**: 07 March 2025 (EoT date: 29th August 2025 |
| **Earliest Decision Date**: | |

## RECOMMENDATION

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. In the event that the requirements of paragraph 1 above are not met by October 31st, the director of planning be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 379.

## EXECUTIVE SUMMARY

3. The application proposes the demolition of the existing industrial buildings on site and the redevelopment for a student housing tower element would be a part 23 and part 27 storey (max 89.5m AOD height), plus basement, element containing 477 purpose-built student accommodation rooms (Use Class Sui Generis), alongside communal student amenity space, student co-working space and associated ancillary spaces, an affordable housing block which would be a part 10, part 13 storey (max 51.7m AOD height) shoulder element, plus basement, containing 79 affordable homes (Class C3), comprising 58 social rented homes and 21 shared ownership intermediate homes and the provision on the ground floor would contain a 98.4sqm flexible e-class use, entrance lobby, bin stores and 6 Blue Badge parking spaces, together with associated amenity and ancillary spaces. The proposal would also re-provide industrial buildings which would consist of a part 1, part 2 and part 4 building (max 18.4m AOD height), containing 1,747sqm of industrial floorspace, including affordable workspace at the southern element of the Site (Classes B2, B8, E(g)(iii), and Sui Generis.

4. The principle of delivering Purpose Built student housing on this site, is considered acceptable as it would also deliver 40% on site affordable housing, in addition to re-providing the existing light industrial uses within the proposed development ensuring that it contributes to the creation of a mixed and inclusive community. The delivery of a community café and small retail unit is also supported.

5. The proposed new homes would meet or exceed the quality standards set out in policy and there would be a high level of dual aspect homes. The proposal would provide 7 wheelchair accessible homes which would equate to 10.1% when measured on a habitable room basis and thus complies with policy. All play space would be provided on site with the proposal also providing high-quality purpose-built student bed spaces.

6. Carbon emissions would be reduced by 84% above the building regulations for the residential element, 35% for the student housing element, and 50% for the commercial elements, which overall 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 and PV panels to deliver these on-site savings.

7. The development would not result in significant impacts on existing nearby residents with no significant adverse impacts identified 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.

8. The height, scale and massing of the building is considered to positively respond to the existing and emerging character as well as the expectations of the Old Kent Road Area Action Plan (AAP). The detailed design would be of a very high quality, providing robust materials and a high-quality design which would provide a contextual response to the emerging AAP area.

9. Transport impacts would be minimal, and the development would contribute to transport improvements in the area including contributions towards bus improvements, cycle hire and highways improvements.

10. In relation to the proposed student bed spaces, thew below table sets out the below mix of room types proposed.

11.

| **Proposed development student room types** | | |
|---|---|---|
| **Room type** | **Average room size** | **Quantity** |
| Studio | 18.8 | 363 |
| Wheelchair room | 27.95 | 24 |
| Twodio (shared kitchen and bathroom) | 39.8 total (11.5 bed spaces) | 45 (90 bed spaces) |
| **Total** | **17.9** | **477** |

12. In relation to the proposed on-site affordable housing, the below table sets out the on-site affordable housing that is proposed on site.

13. **Proposed development affordable housing size and types:**

| Homes | Aff. SR Homes | Aff. SR HR | Aff. Int Homes | Aff. Int HR | Homes Total (% of total) | HR Total |
|---|---|---|---|---|---|---|
| **1-Bed, 1 person** | 1 | 2 | 2 | 4 | **3 (3.80%)** | **6** |
| **1-Bed, 2 person** | 8 | 24 | 4 | 12 | **12 (15.19%)** | **36** |
| **2-Bed, 3 person** | 15 | 60 | 7 | 28 | **22 (27.85%)** | **88** |
| **2-Bed, 4 person** | 19 | 76 | 3 | 12 | **22 (27.85%)** | **88** |
| **3-Bed,5 person** | 16 | 80 | 4 | 20 | **20 (25.31%)** | **100** |
| **Total and % of total** | **59 (74.7%)** | **242 (76.1%)** | **20 (25.3%)** | **76 (23.9%)** | **79 (100%)** | **318 100%** |
| **Affordable Housing** | **40% Overall affordable housing.** | | | | | |

| | |
|---|---|
| **(by habitable room)** | |

14.

| | Existing sqm | Proposed sqm | Change +/- |
|---|---|---|---|
| Public Open Space | 0sqm | 556 sqm | +556 sqm |
| Play Space | 0sqm | 677 sqm | +677 sqm |

15.

| | |
|---|---|
| CO2 savings beyond part L Building Regulations | 84% for the residential element and 35% for the commercial elements. |
| Trees lost | 0 |
| Trees Gained | 4 street trees and 45 at roof level |

16.

| | Existing | Proposed | Change +/- |
|---|---|---|---|
| Urban Greening Factor | N/A | 0.4 | +0.4 |
| Greenfield Run off rate | 109.4 l/s for 1 in 100 yr | 4.1l/s for 1 in 100 yr (5.7l/s 100 yr plus 40%) | - 104.3l/s (-103.7) |
| Green/Brown roofs | 0 | 384.5sqm | +384.5sqm |
| BNG | 0 | 277% | +277% |
| EVCPS | 0 | 0 | 0 |
| Cycle parking spaces | 0 | 358 long stay and 20 short stay. | +358 long stay and 20 short stay. |
| Disabled parking spaces | 0 | 6 | +6 |

17.

| | |
|---|---|
| SCIL (estimated) | £2,570,734 |
| MCIL (estimated) | £1,355,249 |
| S106 | £1,302,223 |

# BACKGROUND INFORMATION

## Site location and description

18. The subject site is located at the junction along Ilderton Road, Surrey Canal Road and Rollins Street, and abuts the railway line connecting London Bridge to the southern areas of London. The Site is vacant but was previously occupied by Jewson and used as a builders' merchants and comprises a single-storey sales building to the south and a double-height warehouse building to the north. Vehicular access is via an entrance from Rollins Street. The total floorspace of the existing buildings is 658 sqm (GIA). The remainder of the Site consists of 2,479 sqm of external yard space, including an area of hard standing used for car parking, storage and loading/servicing.

19. There is a slight change in natural ground level when moving from south to north past or through the site. At the north-east corner of the site on the Surrey Canal Road elevation there is a change in natural ground level as the highway goes under the railway viaduct and into the council boundaries of neighbouring Lewisham Borough.

20. The existing site is accessed from the south via a gate on Rollins Street. This is the only point of access into the site for both vehicles and pedestrians. All other site boundaries are either fenced or have brick walls to the perimeter. This creates a very poor relationship with Ilderton Road and Surrey Canal Road. To the north of the site is a recently opened pocket park, Pat Hickson Gardens, which marks the end of the east-west cycle path that travels along Surrey Canal Road.

21. The surrounding area has been historically consisted of industrial and commercial premises with low to medium rise residential estates including the Bonamy and Bramcote estates to the west, with residential blocks to the southeast within LB Lewisham. Adjacent to the Site is the residential terrace at 209-225 Ilderton Road which is predominantly residential in character but exhibits some commercial uses at ground floor level. However, the area is subject to a number of committed and proposed regeneration schemes that will transform the area into a mixed-use neighbourhood.

22. This includes to the south of the subject site is the former Leathams building which received planning permission for significant redevelopment of the site under reference 19/AP/1773. This proposal is currently in its latter stages of development, and the scheme is similar in height to this application, and also provides residential above industrial uses on lower ground floors of the scheme.

23. The site is within an Urban Density Zone and an Air Quality Management Area. The site is located in Flood Zone 3 as identified by the Environment Agency. Additionally, the site is designated as being within the North Southwark and Roman Roads' Tier 1 Archaeological Priority Area. The site is not within a Conservation Area, nor are there any listed buildings on or within close proximity to the site. However, the site is adjacent to 209-225 Ilderton Road, which sits along the Site boundary which has been locally listed within the Southwark Plan.

24. Transport for London's (TfL) Public Transport Accessibility Level (PTAL) provides a score of 1-6b to rate areas within London and their accessibility to public transport options. A score of 1 represents the lowest accessibility with 6b being the best locations of accessibility to public transport. The subject site is rated as 2 on the PTAL system indicating poor accessibility to public transport. However, South Bermondsey railway station is approximately 600m north of the site (where there are 15-minute frequency services to London Bridge), while the P12 bus service which runs along Ilderton Road provides service to Surrey Quays.

***Image (below):*** *Existing site layout plan*

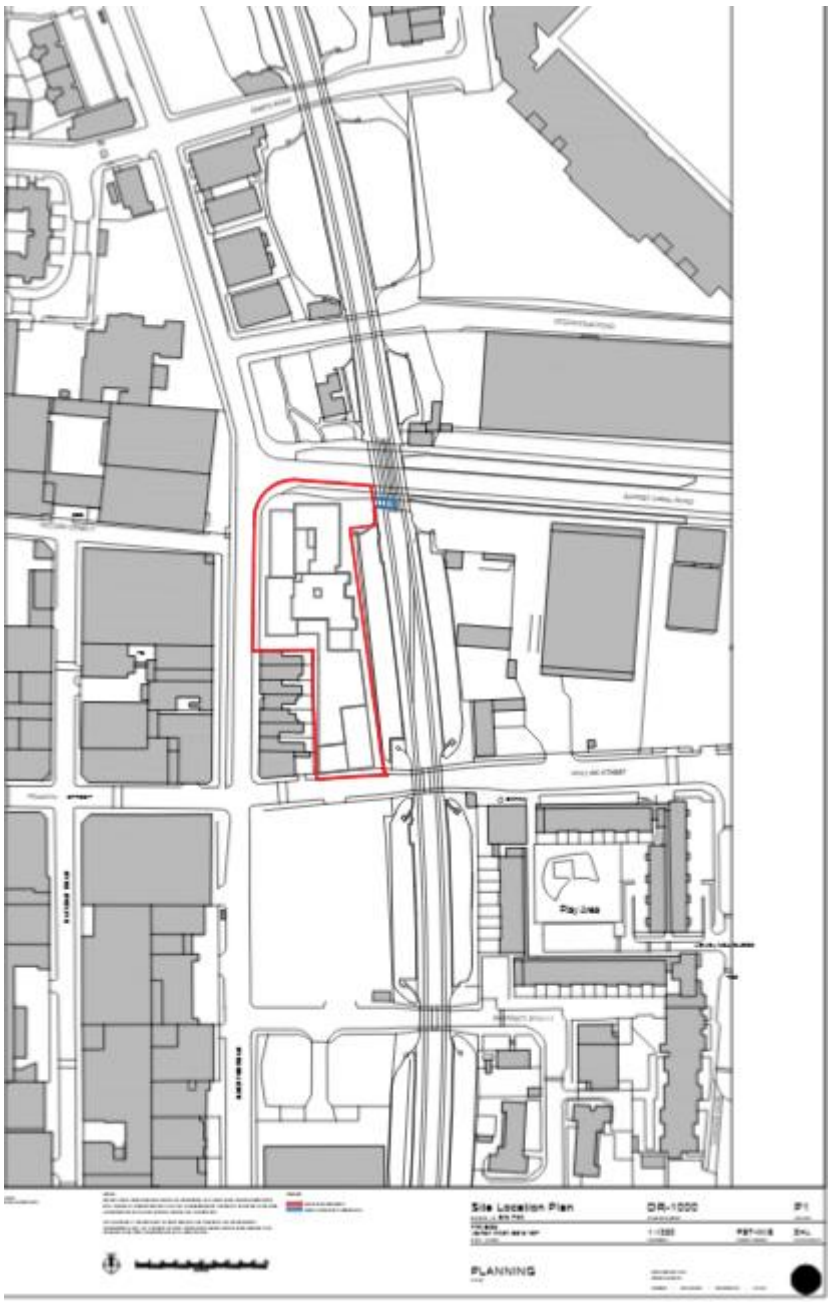
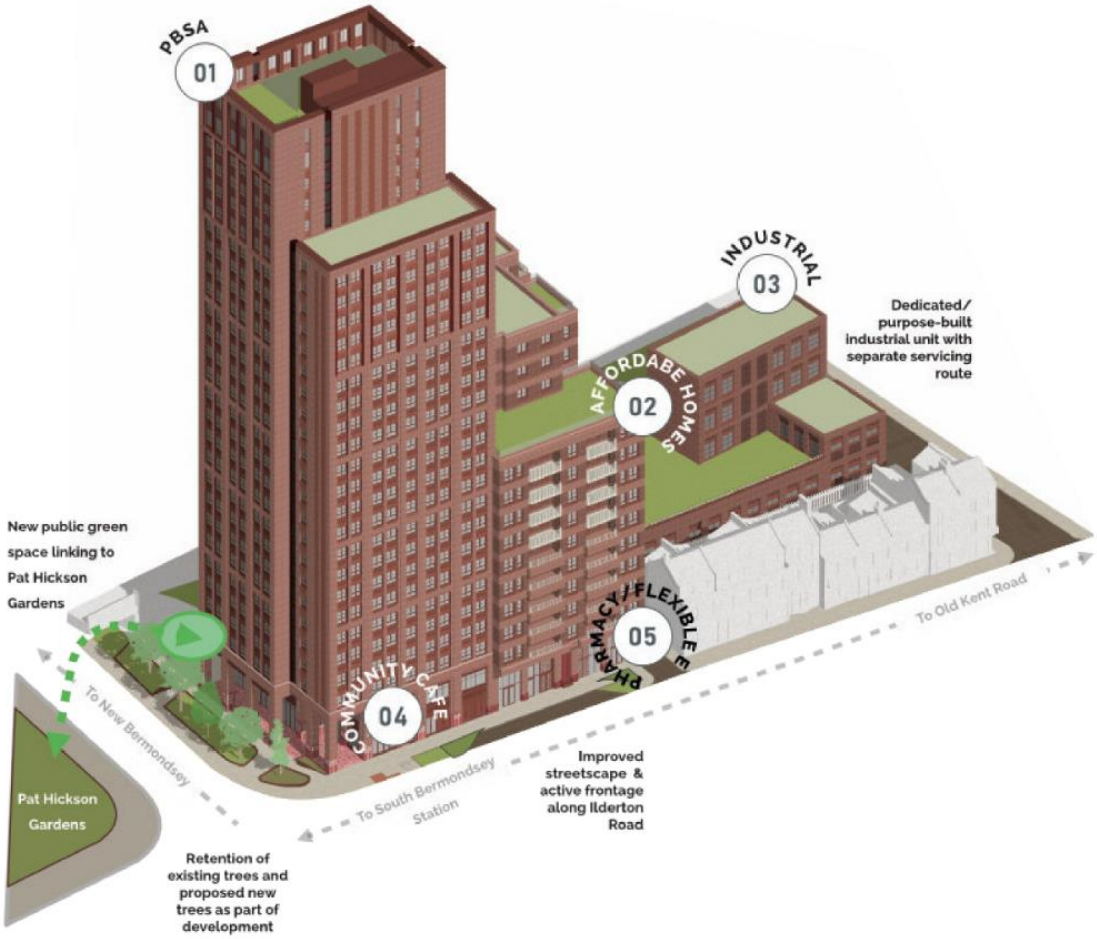


***Image (below):*** *Existing building photo looking south along Ilderton Road*

## Details of proposal

25. The proposal is for the demolition and site clearance of the existing redundant Builders Merchants, and the construction of a singular, linked building housing 477 Purpose Built Student Accommodation units (PBSA – Sui Generis), 79 Affordable Residential units (Class C3), a shared Community and PBSA Café at ground floor level, a Flexible Class E unit which is proposed as a pharmacy, and a Flexible Industrial building (Classes B2, B8, E(g)(iii), and Sui Generis) including Affordable Industrial floorspace. The 27-storey tower element houses the PBSA units and high quality internal and external amenity space, stepping down to a part 10, part 13 storey shoulder element housing the affordable housing units, which steps down further to the south to a part 1, part 2, and part 4 storey industrial building bridged by a landscaped podium garden.

Proposed Axonometric:




Proposed Site Layout

26. The proposed tallest element of the proposal would be the 27-storey tower containing student bed spaces, and café at ground floor which would be located to the north of the site at the junction of Surrey Canal Road and Ilderton Road. The building would then step down to the part 13, part 10 storey element of the proposal which would house a flexible E-class unit at the ground floor, with the proposed and affordable housing above. At the southern end of the site, there would be the proposed industrial building, which would be part two, part four storeys and house 1,747sqm of industrial floorspace, including affordable workspace.

Ground floor:

27. The site is laid out with the access to the student accommodation at the northern end of the site on the corner of Ilderton Road and Surrey Canal Road, which would also incorporate a community café, which would have public access whilst also serving as the main access and reception area for the student accommodation above.

28. As the building moves south, the ground floor would also provide bin store areas and a substation fronting onto Ilderton Road. The access to the affordable housing block, alongside the refuse storage serving this use would then be provided from Ilderton Road alongside a flexible E-class use that is initially proposed as a pharmacy. Vehicular access into the parking area for six blue badge spaces would also be provided here, adjacent to the existing properties at 209-225 Ilderton Road. A servicing bay would also be provided along Ilderton Road.

29. At the southernmost end of the site, to the rear of the terrace properties, the industrial buildings are proposed, with vehicular and pedestrian access located on Rollins Road. Refuse, cycle stores and a servicing area would be provided at ground floor.

Image – site layout

30. Student Housing layouts

As noted, the student housing would be located within the taller tower element on the corner of Ilderton Road and Surrey Canal Road. A combined café and amenity area would be located at ground level with a separate controlled access directly into the lift/stair core. From here access would be provided to the upper floors and basement cycle parking.

31. At first floor level, the student housing block would provide from internal amenity for students which would include a gym, study area, a studio space

and screening room, as well as WC's. Student accommodation would then be provided from the 2nd floor to the 25th floor with further internal amenity being provided at the 26th floor in the form of a 'sky lounge', games room and private dining area. In total 853.3 sqm of internal shared amenity space would be provided for students. At roof level 152sqm of external amenity space would be provided for the student residents, alongside associated plant and PV panels.

32. The proposed student accommodation would provide a mixture of studio spaces and 'twodio' spaces for which two bedrooms would have a shared kitchen and bathroom. The proposed student accommodation is set out as follows:

| **Proposed development student room types** | | |
|---|---|---|
| **Room type** | **Average room size** | **Quantity** |
| Studio | 18.8 | 363 |
| Wheelchair room | 27.95 | 24 |
| Twodio (shared kitchen and bathroom) | 39.8 total (11.5 bed spaces) | 45 (90 bed spaces) |
| **Total** | **17.9** | **477** |

33. A total of 358 long-stay cycle spaces are proposed for the PBSA aspect of the development. Student cycle parking would be provided at basement floor of the student block and would be accessed via a dedicated cycle lift on the eastern entrance of the building.

Affordable Housing

34. The proposal would result in the provision of 79 residential units, all of which are proposed to be affordable, the below table sets out proposed affordable housing split.

| **Homes** | **Aff. SR Homes** | **Aff. SR HR** | **Aff. Int Homes** | **Aff. Int HR** | **Homes Total (% of total)** | **HR Total** |
|---|---|---|---|---|---|---|
| **1-Bed, 1 person** | 1 | 2 | 2 | 4 | **3 (3.80%)** | **6** |
| **1-Bed, 2 person** | 8 | 24 | 4 | 12 | **12 (15.19%)** | **36** |
| **2-Bed, 3 person** | 15 | 60 | 7 | 28 | **22 (27.85%)** | **88** |
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| **3-Bed,5 person** | 16 | 80 | 4 | 20 | **20 (25.31%)** | **100** |
| **Total and % of total** | **59 (74.7%)** | **242 (76.1%)** | **20 (25.3%)** | **76 (23.9%)** | **79 (100%)** | **318 100%** |
| **Affordable Housing (by** | **40% Overall affordable housing.** | | | | | |

| | |
|---|---|
| **habitable room)** | |

35. As the above table outlines, the proposals would result in 318 Affordable housing habitable rooms, with the proposal also including 477 student bedspaces resulting in a total of 795 habitable rooms including student bedspaces. This would result in the proposal providing 40% of the overall habitable rooms being provided as affordable housing with 30.45 % social housing and 9.55% intermediate housing.

36. The affordable housing would be located with its own private entrance at ground floor with three flats located at first floor, with eight homes located around the core from floors two to four, seven homes on each floor over floors five to 10 and three homes on floors 11-13. The intermediate homes would be located at first to fourth floor with the social rented properties located from floors five to 13.

37. Seven wheelchair accessible homes are included: three two-bedroom and four three-bedroom flats in the social rent tenure, and one three-bedroom flat in the intermediate tenure, which would equate to 10.1% provision on site when measures on a habitable room basis.

38. Over the first floor, a podium is proposed which would provide communal amenity and play space for the residential homes. A second roof terrace would also be provided for the residential uses at 10$^{th}$ floor roof level. In total this would provide 852 sqm of communal external amenity space across these two terraces. The proposal also includes 677sqm of children's playspace. All dwellings would have private amenity space ranging from 5.4sqm to 13.1sqm.

39. Cycle storage areas would be provided within the basement with the provision of 242 spaces for the residential element of the proposal, a mixture of Sheffield stands, and two-tier stacking systems is proposed with provision for cargo bikes included. These would be accessed via a dedicated cycle lift.

Commercial floorspace

40. The proposal includes re-providing industrial floorspace in addition to the provision of a community café and flexible E-class unit, which is outlined to be a pharmacy in the initial proposals. The E-class unit would provide 98sqm of floorspace and have access from Ilderton Road.

41. The proposal would prove 1,747 sqm of industrial space, which would be located at the southern end of the site, with access from Rollins Street. The industrial space would be split over the ground, and 1$^{st,}$ 2$^{nd}$ and 3$^{rd}$ floors of this part of the site. The proposal would also include 198.3sqm of affordable industrial floorspace located at 3$^{rd}$ floor. An area of the ground floor would provide internal servicing for smaller vehicles and a blue badge parking space would also be provided within the ground floor, alongside cycle parking and refuse storage. The s106 agreement would require the fit out of all of the industrial space with a 3 phase electricity supply, a suitably specified goods lift, and roller shutter and door entrances to and from the service bay/goods lift,

lighting, heating, cooling and kitchen and toilet facilities, and a sprinkler system, details of which would have to be agreed with the council.

Open Space provision

42. The proposal would include an external public open space of 143.7sqm at the northern end of the site, accessed off of both Ilderton Road and Surrey Canal Road. With an overall provision of 830sqm of new open space provided across the site which includes new public realm and highway improvements within the site.

## Amendments to the application

43. Additional information has been received to clarify comments from internal and external consultee responses. Some minor changes have been made to the design of the proposal following comments received, however these minor elevational changes and the provision of an escape stair from the rooftop amenity space and are not considered material changes to the proposals.

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

### Public Consultation

44. Neighbour consultation for the planning application was undertaken by the council through sending 314 letters to surrounding homes. Six site notices were also placed surrounding the site, including along roads within neighboring Lewisham. No objections have been received; however, four letters of support have been received. These representations are summarised below:

### Support

45.
- The proposals will bring a number of benefits to the residents in the area
- The affordable housing is needed
- The proposed community café will give space for community meetings
- New family housing is positive
- Creates new job opportunities
- Contributes to the wider regeneration of the area
- New landscaping, planting and trees
- Improved public realm.

46. These matters are discussed in detail in the ‘Assessment’ section of this report.

## Summary of main issues

47. The main issues to be considered in respect of this application are:
    - Equalities Impact Assessment
    - Principle of the proposed development in terms of land use;
    - Opportunity Area;

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

## Legal context

48. 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.

49. 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

50. 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.

51. The site is located within the following site designations:

- Locally Strategic Industrial Site (LSIL)
- Old Kent Road Action Area/Opportunity Area
- Bermondsey Lake Archaeological Priority Zone
- Urban Density Zone;
- North Southwark and Roman Roads Archaeological Priority Area
- Air Quality Management Area; and
- Flood Zone 3.

## ASSESSMENT

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

### Relevant policy designations

52. The National Planning Policy Framework (NPPF) was updated in 2024. At the heart of the NPPF is a presumption in favour of sustainable development. The framework sets out a number of key principles, including a focus on driving and supporting sustainable economic development. Relevant paragraphs of the NPPF are considered in detail throughout this report. The NPPF also states that permission should be granted for proposals unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole.

53. The Good Growth chapter of the London Plan includes objectives GG2 and GG5, which focus on making best use of land growing a good economy. To create sustainable mixed-use places that make the best use of land, objective GG2 states that those involved in planning and development must enable the development of brownfield land, particularly in opportunity areas and town centres, and prioritise sites that are well connected by public transport. It also encourages exploration of land use intensification to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. Objective GG5 states that to conserve and enhance London's global economic competitiveness —and ensure that economic success is shared amongst all Londoners— those involved in planning and development must, among other things:

- promote the strength and potential of the wider city region
- ensure that London continues to provide leadership in innovation research policy and ideas, supporting its role as an international incubator and

centre for learning
- provide sufficient high-quality and affordable housing, as well as physical and social infrastructure
- help London's economy to diversify; and
- plan for sufficient employment space in the right locations to support economic development and regeneration.

Old Kent Road Opportunity Area

54. The site is located within the Old Kent Road Opportunity Area (close to the Central Activities Zone) where the London Plan recognises the potential for "significant residential and employment growth" to be realised through a suitable planning framework that optimises development in conjunction with improvements to public transport accessibility. The Old Kent Road Opportunity Area is identified within the London Plan as having an indicative employment capacity of 5,000 and an indicative residential capacity of 12,000 homes.

55. London Plan Policy SD1 encourages opportunity areas to:
- optimise residential and non-residential output;
- optimise density; and
  - contribute towards meeting (or where appropriate) exceeding the minimum guidelines for housing and/or indicative estimates for employment capacity.

56. The Old Kent Road Area Vision of the Southwark Plan 2022 sets out the overall vision for the Old Kent Road. The policy says development should:

- Deliver direct benefits to the existing community including new and improved homes including new council homes, schools, parks, leisure and health centres, and the creation of jobs;
- Promote car free development and support the Bakerloo Line extension, electric buses, taxis, commercial vehicles and cycling which will help to tackle air and noise pollution;
- Help foster a community in which old and young can flourish;
- Build new homes that come in a range of types from terraced houses to apartments with a high design quality including generous room sizes, high ceilings and big windows to ensure people have space to think and to rest;
- Link existing open spaces like Burgess Park to each other and new park spaces;
- Demonstrate excellent standards of environmental sustainability including pioneering new district heating networks to reduce carbon emissions, measures to tackle poor air quality and sustainable urban drainage systems to reduce flood risk.

57. The Old Kent Road Area Vision also states that the Old Kent Road Area Action Plan (OKR AAP) will set out the physical framework that will enable the community to realise its potential. The council is in the process of preparing this Area Action Plan for Old Kent Road which proposes significant transformation of the Old Kent Road area over the next 20 years, including the extension of the Bakerloo Line with new stations along the Old Kent Road

towards New Cross and Lewisham. A further preferred option of the Old Kent Road AAP (Regulation 19) was published in March 2025. Whilst the document is still in draft it has undergone extensive public engagement and reflects the Southwark Plan site allocations fro the area and so can be attributed some weight.

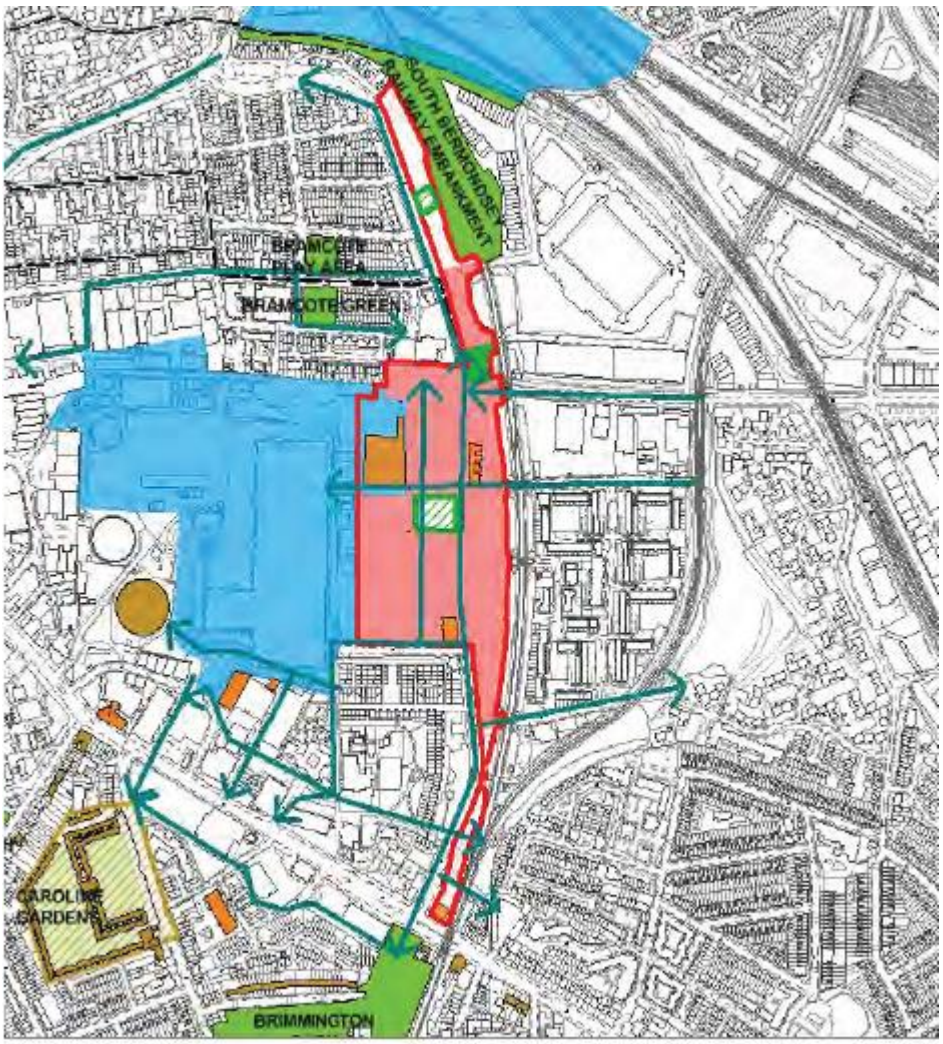
58. The draft AAP sets out the vision for Ilderton Road under site allocation OKR16 and outlines that proposals should provide:

- Industrial co-location by stacking residential on top of Medium-large storage and distribution units (B8).
- Taller buildings will be located on the eastern side of Ilderton Road, particularly at the northern and southern ends which have better public transport accessibility, and around important junctions such as with Surrey Canal Road, which provides links to Lewisham and Bridgehouse Meadows. These taller buildings should be spaced out along the length of Ilderton Road and should be set back from Ilderton Road adjacent to the viaduct. A 10-storey shoulder block should be provided fronting Ilderton road, to mediate the transition in scale; and
- The tallest buildings will be of a similar height to the existing towers on the Tustin estate.

59. The London Plan specifically recognises the value of the proposed Bakerloo Line extension from Elephant and Castle to Lewisham and beyond, which would increase the connectivity and resilience of the Old Kent Road Opportunity Area while also reducing journey times to key destinations. The Southwark Plan Area Vision 13 and draft OKR AAP Policy AAP2 identify that housing development in the OKR will be phased (OKR Housing Phasing Plan), with 9,500 homes being delivered in advance of the BLE and a further 10,500 homes being delivered once the contract for the construction of the BLE has been signed. This is in order to ensure that the public transport capacity in the Old Kent Road can support the quantum of development coming forward. The delivery and phasing plan in AAP2 identifies this site as a Phase 1 site.

60. The application site is identified within the Southwark Plan 2022 (Policy P29) as a Locally Significant Industrial Site (LSIS). The objective of this designation is for LSIS sites to be intensified for residential and industrial co-location. In addition, the site is also within the boundaries of Site Allocation NSP70 ‘Hatcham Road and Penarth Street and Ilderton Road’ of the Southwark Plan 2022. NSP70 requires developments to:

- Provide new homes (C3) and
- Provide at least the amount of employment floorspace currently on the site.
- (E(g), B class) and
- Provide industrial uses (E(g)(iii) or B8 use class); and
- Provide public open space - 1,990m2.




61. The proposals would provide purpose-built student accommodation (PBSA), whilst also providing on site affordable housing in the form of 79 dwellings. It would also provide 830 sqm of open space (an uplift from 245sqm of public open space provided under the previous application ref: 21/AP/4757). The provision of open space would contribute towards the overall goal of 1,990sqm of public open space for the NSP70 allocation.

## Industrial and commercial uses

62. London Plan Policies E4, E6 and E7 recognise that there may be potential within LSIS for industrial intensification and co-location with residential and

other land uses, subject to compliance with the criteria set out in Policy E7. This criterion includes ensuring adjacent industrial activities are not compromised in line with the Agent of Change principle set out in London Plan Policy D13.

63. The Old Kent Road was designated as an Opportunity Area through the previous iteration of the London Plan, with an indicative capacity of 1,000 new jobs and a minimum of 2,500 new homes. However, this has been increased to an indicative capacity of 12,000 homes in the New London Plan (2021). The London Plan notes that the emerging OKR AAP should "set out how industrial land can be intensified and provide space for businesses that need to relocate from any SIL identified for release. Areas that are released from SIL should seek to co-locate housing with industrial uses, or a wider range of commercial uses".

64. Furthermore, the draft OKR AAP sets targets of 20,000 new homes and 10,000 new jobs, to be supported by new infrastructure, including parks and schools. It proposes the release of a substantial part of the Strategic and local Preferred Industrial Location designation to allow for the creation of mixed-use neighbourhoods where new and existing businesses would co-exist with new homes.

65. The NPPF promotes making effective use of underutilised land, especially where this would help meet an identified need for housing. This has been incorporated into adopted policy as set out in Policy GG2 of the London Plan which seeks to prioritise the development of Opportunity Areas and sites which are well connected by existing or planned Tube and rail stations and small sites. The application site is located within the Old Kent Road Opportunity Area. In locations such as this, both London Plan and Southwark Plan policies strive for higher density, high-quality mixed-use developments which assist in addressing the need for new homes and ranges of employment opportunities.

66. In the draft OKR AAP, the site is identified as falling within Sub Area 4 and Proposal Site OKR16. The AAP reiterates the purpose for LSIS sites to incorporate new homes typologies into developments to co-exist along with industrial uses on site. This is illustrated in the typologies map on the following page of this report.

67. The existing use on site is not considered to maximise the potential of this Opportunity Area Proposal Site. The application proposes to deliver 1,747 sqm GIA of industrial floorspace, which represents an increase of 850 sqm GIA against the extant consent and 1,089 sqm GIA against existing. The use class for the commercial unit would be limited by condition to light industrial, use Class E (G) iii. It is anticipated that the scheme would deliver major regeneration benefits that are further discussed in the proceeding parts of this report. The principle of the re-provision is thus considered acceptable.

68. In addition to the provision of the industrial floorspace, the proposals would contain a 98.4sqm flexible e-class use, alongside the provision of a 252sqm community café space within the ground floor of the student housing block. These uses are considered appropriate small scale uses that contribute

towards the local needs as further developments come forward within the surrounding area.

## Affordable workspace

69. London Plan policy E3 ‘Affordable Workspace’ requires Boroughs to seek provision of on-site affordable workspace in certain circumstances and also outlines that Boroughs, in their Development Plans, should consider detailed affordable workspace policies in light of local evidence of need and viability. Policy P31 of the Southwark Plan requires developments proposing 500sqm GIA or more employment floorspace to provide 10% of the proposed gross employment floorspace as affordable workspace on site at discount market rents.

70. The proposals include 199 sqm GIA affordable workspace from the outset, equivalent to 13% of the commercial floorspace, which is strongly supported in line with London Plan Policy E3 and Southwark Plan policy P31. This will also be an uplift over the existing permission of 101sqm. The affordable workspace will be secured in the s106 agreement for 30 years and will ensure that discount rents will be applied and monitored.

## Delivery of housing

71. The London Plan sets the borough a target of providing 23,550 net new home completions over the next ten years. The targets are to be achieved by allocating a range of sites for housing; encouraging development on appropriate windfall sites; and optimising the potential for housing delivery on all suitable and available brownfield land. In order to help meet this target – while also ensuring social and other infrastructure is delivered to create mixed and inclusive communities as well as employment opportunities– London Plan Policy SD1 promotes mixed use development in opportunity areas, whereby functions such as retail and community are provided alongside housing.

72. Policy H1 of the London Plan seeks to optimise the potential for housing delivery on all suitable and available brownfield sites, especially on sites with existing or planned public transport access levels of 3-6 or which are located within 800 metres of a station or town centre boundary.

73. At the local level, the Southwark Plan and draft OKR AAP reiterate the targets established by the London Plan. Policy ST1 ‘Development targets’ of the Southwark Plan states that the Council “will work with our partners, local communities and developers to ensure that developments deliver the required growth and improvements to achieve our targets including 40,035 homes between 2019 and 2036 (2,355 new homes per annum)”. Of the 40,035 homes, the Plan aims for 11,000 to be new council homes. In seeking to play its role in the delivery of these borough targets, the draft OKR AAP sets out the phased delivery of 20,000 homes by the year 2042.

74. The regeneration of the application site for housing-led development is promoted by the site allocations in the Southwark Plan and the draft AAP. Both NSP70 and OKR 16 identify the allocation area’s capacity as being 2,200

homes.

75. The proposals would deliver 477 purpose-built student accommodation rooms, alongside providing 79 affordable homes, comprising 58 social rented homes and 21 shared ownership intermediate homes on site. When considering the provision of student bedspaces, PBSA has a recognised relationship in releasing wider housing stock to the market which are typically suitable for family housing. This is recognised by the London Plan at a ratio of 2.5:1. The provision of 477 bedspaces would free up the equivalent of 191 conventional residential dwellings, alongside the provision of the 79 affordable homes would equate to the overall provision of 270 homes on site which would significantly contribute towards realising the housing delivery targets for the Opportunity Area, in line with London Plan Policy SD1, while also increasing London's housing supply, in accordance London Plan Policy H1.

76. The proposed housing units are lent further support by the Southwark Plan and the draft AAP, which promote residential uses on the application site in the quantum proposed, including the provision of on-site affordable housing.

77. It is also noted that there is an existing permission on site which was granted for the provision of 170 residential homes, of which 35 would have been social rented and 26 intermediate affordable tenure. This would have equated to 128 habitable rooms of social rent and 109 habitable rooms of intermediate affordable.

78. This proposal would result in an overall uplift in the number of homes (170 to 270), whilst also providing an uplift in the number of affordable social rented homes from 35 to 59 (uplift of 24). This would also result in an increase in affordable habitable rooms from 128 to 242 social rented homes and a small reduction in intermediate habitable rooms from 109 to 76. Overall, this is considered a significant positive of the proposals as they would maximise the number of affordable homes on the site as set out below.

Affordable Housing and viability

79. 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.

80. 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.

81. 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.

82. In relation to the proposed provision of accommodation within the development, the below table sets out the overall quantum of housing, including affordable housing proposed within the development, this includes revisions made by the applicants to increase the provision of social rented homes by 8 overall from the scheme initially submitted:

| Homes | Aff. SR Homes | Aff. SR HR | Aff. Int Homes | Aff. Int HR | Homes Total (% of total) | HR Total |
|---|---|---|---|---|---|---|
| **1-Bed, 1 person** | 1 | 2 | 2 | 4 | **3 (3.80%)** | **6** |
| **1-Bed, 2 person** | 8 | 24 | 4 | 12 | **12 (15.19%)** | **36** |
| **2-Bed, 3 person** | 15 | 60 | 7 | 28 | **22 (27.85%)** | **88** |
| **2-Bed, 4 person** | 19 | 76 | 3 | 12 | **22 (27.85%)** | **88** |
| **3-Bed,5 person** | 16 | 80 | 4 | 20 | **20 (25.31%)** | **100** |
| **Total and % of total** | **59 (74.7%)** | **242 (76.1%)** | **20 (25.3%)** | **76 (23.9%)** | **79 (100%)** | **318 100%** |
| **Affordable Housing (by habitable room)** | **40% Overall affordable housing.** | | | | | |

83. The proposal provides a total of 79 affordable units (comprising 318 habitable rooms), of which 59 are social rented units (242 habitable rooms) and 20 are intermediate homes to be provided as shared ownership (with 76 habitable rooms).

84. In terms of Southwark Plan policy SP1, the proposed affordable housing offer would be policy compliant in the provision of 40% affordable housing with a policy compliant tenure split, providing further social rented properties beyond the required split with 30.45% of the homes being provided as social rented and 9.55% intermediate.

85. The applicant's viability assessment which was based on the initial submission of 79 affordable homes with 59 social rented homes and 20 intermediate homes, has been reviewed by the Councils viability consultants who have confirmed that this is the maximum amount of affordable housing that the proposed development can achieve.

Purpose Built Student Accommodation:

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

87. Policy H15 of the London Plan sets an overall strategic requirement for purpose-built student accommodation (PBSA) of 3,500 bed spaces to be provided annually. The supporting text to Policy H15 is clear that PBSA contributes to meeting London's overall housing need and is not in addition to this need. Section 3.9 of the Mayor of London's Housing SPG states that specialist student accommodation makes an essential contribution to the attractiveness of London as an academic centre of excellence.

88. Part A of Policy H15 states that boroughs should seek to ensure the local and strategic need for PBSA is addressed, provided that:

1. the development contributes to a mixed and inclusive neighbourhood;
2. it is secured for occupation by students;
3. the majority of bedrooms and all affordable student accommodation is, through a nominations agreement, secured for occupation by students of one or more higher education providers;
4. the maximum level of accommodation is secured as affordable student accommodation and;
5. the accommodation provides adequate functional living space and layout.

89. Part B of Policy H15 encourages boroughs, student accommodation providers and higher education providers to deliver student accommodation in locations well-connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment schemes.

90. Policy P5 of the Southwark Plan requires PBSA proposals where all the bedspaces would be 'direct-lets', as set out below:

- as a first priority deliver the maximum amount of PBSA alongside a minimum of 35% of the habitable rooms as conventional affordable housing (subject to viability);
- in addition to this provide 27% of student rooms let at a rent that is affordable to students as defined by the Mayor of London.

91. Policy P5 is structured in recognition of the acute need for more family and affordable housing within the borough. One of the footnotes to the policy explains that "allowing too much student accommodation will restrict our ability to deliver more family and affordable housing. By requiring an element of affordable housing, or a contribution towards affordable housing from student housing development providing direct-lets, we can make sure we work towards meeting the strategic need for student accommodation and our local need for affordable homes including affordable family homes".

92. As such, the student housing policies of the Southwark Plan and London Plan, Policy P5 and Policy H15 respectively, differ in two key ways:

- Policy H15 prioritises the delivery of the maximum viable number of affordable student rooms (and does not expressly require student housing proposals to deliver conventional affordable housing either on- or off-site), whereas Policy P5 prioritises the delivery of conventional affordable housing; and
- Policy H15 expects at least 51% of the bedspaces (the majority) to be subject to a nominations agreement, whereas Policy P5 requires all the bedspaces to be subject to a nominations agreement subject to viability.

93. Section 38(5) of the Planning and Compulsory Purchase Act 2004 (as amended) confirms that if to any extent a policy contained in a development plan for an area that conflicts with another policy in the development plan the conflict must be resolved in favour of the policy contained in whichever of those documents became part of the development plan most recently. As the Southwark Plan underwent examination and was adopted more recently than the London Plan, the policies within the Southwark Plan take precedence in this instance. The Council faces a complex situation locally with regard to the provision of affordable housing; at the Southwark Plan Examination in Public, the examining Inspectors recognised this challenge as presenting specific local circumstances in Southwark with regard to PBSA and endorsed Policy P5 cognisant that the policy requirements do not fully align with those of the London Plan PBSA policies. Essentially, this means a student housing planning application within Southwark prioritising the conventional affordable housing contribution may be acceptable in principle in policy terms, despite not fully aligning with the expectations of London Plan Policy P15.

94. As noted, there is a demand for more student accommodation across London, which needs to be balanced with making sure Southwark has enough sites for other types of homes, including affordable and family housing.

95. There are several higher education institutions (HEIs) in the borough with teaching facilities and student accommodation. These include London South Bank University (LSBU), Kings College London (KCL), University of the Arts (UAL) and London School of Economics (LSE). Mountview Academy, based in Peckham Rye, also provides a range of undergraduate and postgraduate degrees validated by the University of East Anglia (UEA). The borough is also home to some other smaller satellite campuses.

96. The strategic need for student accommodation is evidenced through the GLA paper ‘Student Population Projections and Accommodation Need for new London Plan 2017’ (amended October 2018). Drawing on Higher Education Statistics Agency (HESA) data, this document sets out the annual student housing need for 3,500 bed spaces within London over the plan period. The study projects the total student accommodation need in London to increase from 104,835 bed spaces to 171,063 bed spaces by the end of the plan period (2041/42).

97. The evidence base underpinning the Southwark Plan included a background paper on student housing, dated December 2019. It refers to the Council's Strategic Housing Market Assessment (SHMA) Update 2019, which found that:
- major HEIs within Southwark provide a total of 23,500 course places
- over 21,000 students aged 20 or above live in the borough during term time
- at least 50% of these students live in private rented accommodation, while 15% live with their parents; and
- there are some 7,800 bed spaces in PBSA in the borough.

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

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

99. As noted, criterion 1 of London Plan Policy H15(A) requires student housing proposals to contribute to a mixed and inclusive neighbourhood.

100. Further to this, AAP Policy 4 (Student Homes) of the draft AAP (2025) states that developments with student homes should demonstrate that they would integrate with the existing and future residential and business communities creating successful mixed and inclusive neighbourhoods, taking account of:

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

101. As noted above, 40% on-site affordable housing is provided on site, alongside industrial and commercial uses, which include the provision of 13% affordable workspace provided on site, ensuring an appropriate balance of both residential and commercial uses on-site.

102. Furthermore, there are a broad range of uses within the surrounding area, including the Bonamy and Brancote Estate, Tustin Estate and Winslade Estate (in Lewisham), all of which are within 250m of the site, as well as the residential development completing within 2025 at 227-255 Ilderton Road.

103. There is one completed student scheme within 400m of the site that contains a total of 250 student rooms. That scheme also comprises 35% on site affordable housing and light industrial use at ground and first floor levels.

Within the Old Kent Road, two further entirely PBSA schemes have been completed at 671-679 Old Kent Road (known as the former KFC site, ref: 20/AP/2701) and at 272 St James Road (ref: 18/AP/0156, allowed by appeal) which are circa 570m and 920m away. There is a further entirely PBSA scheme at 43-47 Glengall Road (ref: 20/AP/0039) that is circa 1.2km away and will complete in early 2025. In total, these schemes provide 1,193 PBSA rooms in the OKR AAP area. There are no other planning consents at present for student schemes in the OKR16 site allocation.

104. There is however one further application at 257-283 Ilderton Road (ref: 23/AP/1317) which proposed 592-bedspaces; however, this was refused by the Council as it would not deliver any conventional affordable housing on site and would thus fail to contribute to a mixed and balanced community. This is now the subject of an appeal.

105. In terms of the emerging context within the site allocation OKR16 within sub area 4 of the draft OKA AAP, the table below shows there have been 245 conventional homes, 250 PBSA beds and 5,556sqm of commercial space completed and there is currently one scheme under construction which will provide a total of 254 conventional homes and 2,538sqm commercial floorspace. Several planning applications have been approved or received resolution to grant by the planning committee for the sites which will deliver a further 438 conventional homes and 886 Purpose Built Co-Living (PBCL) units and 8,406 sqm commercial floorspace under phase 1. Of the total conventional homes, approximately 37.8% will be affordable housing. Furthermore, 49 conventional homes together with 1,242 sqm commercial floorspace are also approved for phase 2.

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

| | | | | | |
|---|---|---|---|---|---|
| **Approved** | | | | | |
| 20/AP/3560 | 301-303 Ilderton Road | 59 | N/A | N/A | 449 |
| 21/AP/1121 | 12-38 Hatcham Road | 49 | N/A | N/A | 1,500 |
| 21/AP/1619 | 132-136 Ormside Street | 0 | N/A | N/A | 270 |
| 21/AP/4757 | Ilderton Wharf, 1-7 Rollins Street **(*The application site)*** | 170 (79 under this application) | N/A | N/A | 988 |
| 23/AP/0387 | 79-161 Ilderton Road | 120 | N/A | 605 | 1,023 |
| **Resolution to grant subject to s106 and GLA Stage II referral** | | | | | |
| 22/AP/1603 | 18 - 22 Penarth Street | 47 | N/A | 281 | 4,176 |
| **Subtotal** | | **445 (354 under current proposals)** | **0** | **886** | **8,406** |
| **Phase 2** | | | | | |
| **Approved** | | | | | |
| 23/AP/2226 | 78-94 Ormside Street | 49 | N/A | N/A | 1,242 |
| **Overall total** | | 986 | 250 | 886 | 16,510 |

106. Furthermore, a hybrid planning permission for a total 690 homes and 5,666 (GEA) non-residential floorspace has also been granted for the Tustin Estate redevelopment (ref: 22/AP/1221). Phase 1 of the Tustin development is currently undergoing construction which will deliver 167 conventional homes.

107. It is also noted that new development involving PBSA within nearby site allocation OKR18 within sub area 4 has been given planning consent or resolution to grant. These sites are located approximately 450 metres south-west of this application site:

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

108. When considering the cumulative impacts of the emerging PBSA developments nearby within the site allocation OKR16 and OKR18 and the Tustin Estate redevelopment, it should be noted that some of these schemes may or may not be implemented despite the grant of planning permission. Also, these schemes if implemented will also deliver a substantial number of new homes with different bedroom and tenure mix (up to 1,747 homes) together with non-residential uses in the area. Furthermore, there also other sites available within OKR 16 and OKR 18 that could potentially come forward for conventional housing development to further add to this provision.

109. Considering the above, the overall proportion of the conventional homes in subarea 4 would still be broadly maintained, with the proposals contributing towards on-site affordable housing delivery. The development therefore would meet criteria 2.2 and 2.3 of the draft AAP Policy 4.

110. As such, introducing the amount of student housing proposed alongside affordable housing and commercial uses in an area where conventional residential uses are well represented, is in this instance considered to contribute to a mixed and inclusive community.

*Would the accommodation be secured for student occupation?*

111. Criterion 2 of London Plan Policy H15(A) requires the use of the accommodation to be secured for students.

112. The proposed development will be managed by an independent provider, most probably Homes for Students, an Accreditation Network UK certified operator. As such, responsibility will rest with Homes for Students to ensure the units are let to students on courses with HEIs. Student-exclusive use will be secured by way of an obligation in the Section 106 Agreement.

113. A supporting paragraph to Policy H15 notes that boroughs should consider allowing the temporary use of accommodation during vacation periods for ancillary uses. The viability evidence base for the Southwark Plan tested direct-let student housing schemes assuming a 40-week term time tenancy with 11-week non-term-time let allowance. In light of this, it is considered reasonable to allow the operator of the proposed student housing scheme to let the rooms during the vacation period when not in use by the principal student occupiers. This will be secured through the Section 106 Agreement.

*Is a nominations agreement in place?*

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

115. The applicant does not intend to enter into a nominations agreement with a HEI for any of the proposed accommodation; instead, the accommodation will be directly managed by an independent provider. While the proposed development would not comply with Criterion 3 of Policy H15(A) due to being 100% ‘direct-let’, the locally-specific and more up-to-date student housing policy (Southwark

Plan Policy P5) supports direct-let student housing subject to the provision of affordable housing (which is in turn subject to viability) and additionally a proportion of the affordable student accommodation, and recognises it as PBSA. Accordingly, it is considered that if a development proposal complies with the affordable requirements that Policy P5 sets out for direct-let schemes, there is a policy compliant basis in this location for student accommodation schemes to not require the securing of a nominations agreement.

*Has the maximum level of affordable housing been secured?*

116. Criterion 4 of London Plan Policy H15(A) requires the maximum level of accommodation to be secured as affordable student accommodation.

117. However, and as mentioned in earlier parts of this report, it is considered that Southwark Plan Policy P5, in its prioritisation of conventional affordable housing delivery (subject to viability), provides the most up to date policy position and this prioritises the provision of maximised affordable housing. The proposals would deliver 79 affordable dwellings on site which would equate to 40% affordable housing by habitable room. This has been tested by the Councils viability consultants as considered the maximum amount that the proposals could deliver.

*Does the accommodation provide adequate functional living space and layout?*

118. A supporting paragraph to London Plan Policy H15 states that schemes not securing a nominations agreement for the majority of the accommodation will normally be considered as large-scale purpose-built co-living (PBCL). The London Plan expects the quality of accommodation PBCL schemes to be assessed against the requirements of Policy H16 and Purpose-built Student Accommodation London Plan Guidance (2024); these are more onerous than the counterpart standards for PBSA, which are set out in Criterion 5 of Policy H15(A). However, owing to the supportive position of the Southwark Plan regarding the principle of 100% direct-let PBSA, when assessing whether the accommodation proposed by this planning application would provide adequate functional living space and layout, it is considered appropriate to do so against the standards set by Criterion 5 of Policy H15(A) rather than Policy H16.

119. Criterion 5 of Policy H15(A) requires the accommodation to be adequate and functional in terms of its living space and layout. Southwark Plan Policy P5 which requires 5% of student rooms as “easily adaptable for occupation by wheelchair users”.

120. It is considered that the proposed development would provide good quality accommodation for students, meeting the expectations of the London Plan Policy H15 Part A (5) and Southwark Plan Policy P5. The spatial arrangement, environmental internal conditions, level of amenity (within the individual units and the communal spaces), and the provision of wheelchair housing would all be adequate, as explained in detail in a subsequent part of this report entitled ‘Quality of Accommodation’.

*Is the location suitable for student accommodation?*

121. Part B of London Plan Policy H15 requires student housing scheme sites to be well connected by transport to local services. Situated within the Opportunity Area and with good proximity to the Old Kent Road South District Town Centre (within 9 minutes' walk) and South Bermondsey Station, the site would also benefit from future transport improvement and the BLE which would result in high accessibility to public transport, conveniences and services. There are also numerous leisure and recreation spaces available for students nearby, including Bramcote Park, Brimmington Park and Bridgehouse Meadows. Goldsmiths approximately 20 minutes away by bus. For all of these reasons, the application site is considered to a suitable location for PBSA.

Conclusion on student Housing provision

122. For the reasons given above, the proposed student accommodation use would help contribute to the strategic housing delivery targets of the development plan, whilst also providing on-site affordable accommodation and would provide a suitable mix of uses which would contribute to the creation of a mixed and inclusive community. Furthermore, the applicants have provided an analysis of how the building could easily be adapted in the future for alternative uses, including a hotel or residential. As such, given the provision of on-site affordable housing, the provision of student accommodation is considered acceptable.

Old Kent Road Phasing

123. The Greater London Authority (GLA) and Transport for London (TfL) officers have worked closely with Southwark Council officers to agree the broad geography and phasing of development in the area covered by the OKR AAP, to help provide certainty to communities, local businesses and developers in advance of the Bakerloo Line Extension (BLE) and a clear timetable for its delivery. This has resulted in broad agreement between the GLA, TfL and Southwark Council on the scale and geography of the area's new town centres, where industrial uses will be retained, replaced and intensified, and how housing delivery will be phased in advance of the BLE. Broad alignment and the location of potential tube stations has also been agreed between Southwark Council and TfL and formal safeguarding is in place (which is further discussed later in the below paragraphs).

124. As part of this process, a cap of 9,500 net additional homes has been agreed for Phase 1 until a BLE construction contract is in place. In this case, recognition has been given to the severity of the need to provide housing stock along with an improved and functional floorspace for the industrial uses. As such, as with the previous permission for this site (21/AP/4757) officers have ensured that the proposed redevelopment of the subject site can be incorporated into the 9,500 cap, replacing the previously granted consent.

## Conclusion on Land Use

125. The scheme would deliver major regeneration benefits, including a significant contribution to the borough's housing stock, including 40% on-site affordable housing on a habitable room basis and the reprovision and increase in industrial space. It is therefore considered that the development, in land use terms, is acceptable, and its contribution to the creation of a mixed and inclusive community in the Old Kent Road Opportunity Area (OKROA) is supported.

## Environmental impact assessment

126. Environmental Impact Assessment (EIA) is a process reserved for the types of development that by virtue of their scale or nature have the potential to generate significant environmental effects.

127. The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 set out the circumstances in which development must be underpinned by an EIA. Schedule 1 of the Regulations sets out a range of development, predominantly involving industrial operations, for which an EIA is mandatory. Schedule 2 lists a range of development types for which an EIA might be required due to the potential for significant environmental impacts to arise. Schedule 3 sets out that the significance of any impact should include consideration of the characteristics of the development, the environmental sensitivity of the location and the nature of the development.

128. A screening opinion was submitted to the Council for the proposed development under application ref: 24/AP/2057. While the development is considered an Urban Development Project, as defined in Schedule 2 of the Environmental Impact Assessment Regulations (2011) as amended), having considered the selection criteria referenced in Schedule 3 of the Regulations and the checklist set out in the National Planning Policy Guidance, it is considered that the development is not likely to have significant effects upon the environment. The matters to be considered can be adequately assessed through the submission of technical reports alongside the planning application, and therefore an EIA is not necessary. Those impacts which are identified through the various submitted reports and studies can be mitigated through appropriate conditions or obligations.

## Housing mix, density and residential quality

Affordable housing dwelling mix:

129. London Plan Policy H1 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.

130. Policy P2 of the Southwark Plan sets out that proposals should provide a minimum of 60% of homes with two or more bedrooms and a minimum of 25% of homes with three or more bedrooms in the urban zone, such as this and that a maximum of 5% studios.

The proposed development would provide the following housing mix:

| Unit Type | Social rent | Intermediate | Total |
|---|---|---|---|
| Studio (one-bed one person) | 1 (1.27%) | 2 (2.53%) | 3 (3.8%) |
| One-bed two person | 8 (10.13%) | 4 (5.06%) | 12 (15.2%) |
| Two bed | 34 (43.0%) | 10 (12.7%) | 44 (55.7%) |
| Three bed | 16 (20.3%) | 4 (5.0%) | 20 (25.3%) |
| Two bed + | 50 (63.3%) | 14 (17.7%) | 64 (81%) |
| Total | 59 (74.7%) | 20 (25.3%) | 79 (100%) |

131. The above table demonstrates that the proposals would exceed the requirements of policy, with 81% of dwellings being 2 or more bedrooms, with 25.3% of dwellings having 3 bedrooms, which is supported. Furthermore, less than 5% of the dwellings would be studios/one-bed one-person dwellings which accords with Policy P2 of the Southwark Plan.

## Wheelchair Housing

132. 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.

133. The proposed development would provide 7 wheelchair accessible homes spread across all tenures and this would equate to 10.1% wheelchair homes on a habitable room basis, thereby satisfying the policy requirement. These 7 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 be 2-bed-4-person and 3-bed-5 person dwelling and all would meet or exceed the accessible wheelchair user housing minimum space standards set out in Policy P7 and the Residential Design Standards SPD.

## Home sizes

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

135. All proposed homes would meet or exceed the minimum standard of studio, one-, two- and three-bedroom homes, in accordance with the minimum space standards as per Table 6 of Policy P15 of the Southwark Plan. Furthermore, all wheelchair accessible homes would meet the requirements of Southwark Plan policy P8. The following tables provide a breakdown of the range of unit sizes contained within the development.

| Unit Type | SPD Requirement (sqm) | Size range proposed (sqm) |
|---|---|---|
| Studio (one-bed one person) | 39sqm | 40.6sqm |
| One-bed two person | 50sqm | 54.2-55.6sqm |
| Two bed three person | 61sqm | 64.8-74.7sqm |
| Two bed four person | 70sqm | 72.6-76.4sqm |
| Two bed four-person wheelchair accessible | 85sqm | 85.6sqm |
| Three bed five person | 86sqm | 88.2-91.2sqm |
| Three bed five-person wheelchair accessible | 110sqm | 110sqm |

136. Overall, the proposed homes are of a high quality, meeting the minimum space standards as outlined within the Southwark Plan and overall that development has successfully designed the layout of each floor to accommodate each bedroom type without compromising the quality of accommodation. Layouts of the flats are well proportioned with no hidden corners with an emphasis of ease of movement and circulation within each flat. Furthermore, each apartment prioritises placing the open plan living / kitchen / dining room to the corners of the building where possible to maximise potential dual aspect living spaces for increased natural daylighting and views. Overall, it is therefore considered that the size and layouts of the units are acceptable and would provide a good quality of accommodation.

Aspect

137. 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.

138. The application proposes a high proportion of the homes (58%) to be dual aspect in accordance with the definition set out in the Southwark Plan. However, there would also be a further 29% of dwellings which would have enhanced access with windows within the side elevations of the bay protrusions within the development. Furthermore, there would be no north facing single aspect homes, with all the single aspect homes facing east, south or west. All, apart from one 3+ bed units are dual aspect, and 65.9% of two-bed units are dual aspect. The below table sets out level of dual aspect dwellings by tenure showing that a greater number of the social rented properties would be dual aspect.

| Tenure | Single Aspect | | Dual Aspect | |
|---|---|---|---|---|
| | Units | % | Units | % |
| Shared Ownership | 11 | 55% | 9 | 45% |
| Social rent | 22 | 33.7% | 37 | 62.7% |
| Total | 33 | 42% | 46 | 58% |

## External Amenity space

139. 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.

140. 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.

141. Over the first floor, a podium is proposed which would provide communal amenity and play space for the residential homes. A second roof terrace would also be provided for the residential uses at 10th floor roof level. In total this would provide 852 sqm of communal external amenity space across these two terraces. The proposal also includes 677sqm of children's playspace. All dwellings would have private amenity space ranging from 5.4sqm to 13.1sqm. All homes with three or more bedrooms would benefit from at least 10sqm private amenity space which demonstrates a high quality of amenity space.

142. In order to comply with the requirements of the Residential Design Standards SPD, 50sqm communal amenity space per development should be provided. This should be provided in addition to the requirement to compensate for any shortfall in private amenity space.

143. The proposals would provide a total of 852sqm external communal amenity space for the affordable housing element of the proposals, which would be significantly more than the policy requirement, even when taking into account the private amenity space shortfall as the below table demonstrates. 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.

| Private amenity space shortfall (sqm) | Communal amenity space requirement (sqm) | Total Required communal amenity space | Proposed communal amenity space | Balance |
|---|---|---|---|---|
| 27.6 | 50 | 77.6 | 852 | +774.4 |

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

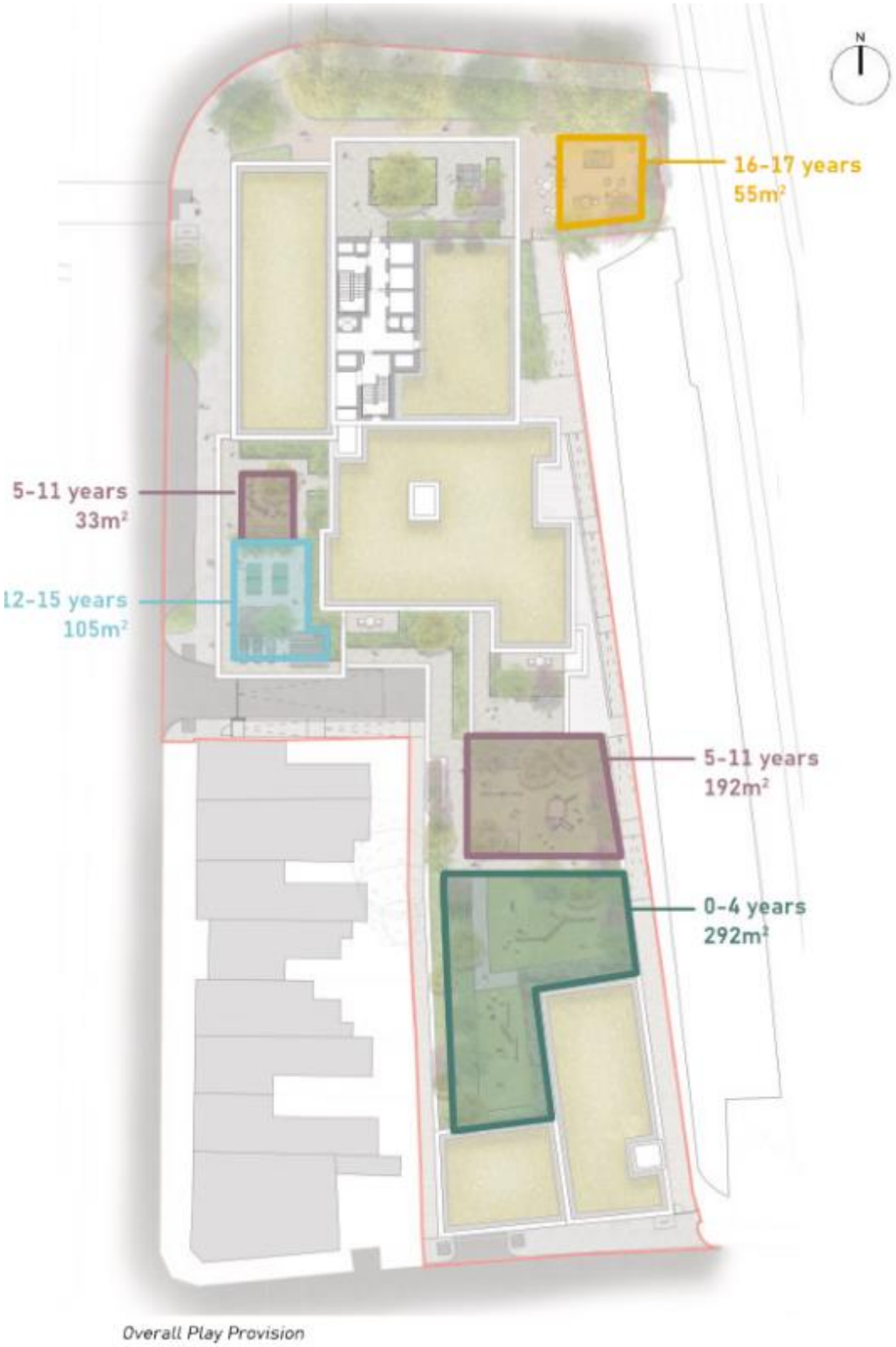
## Children's play space

145. 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.

146. The proposed mix requires a total of 677m2 of play space as per the GLA Play Calculator across the scheme. The proposed scheme meets the policy requirement, providing a total of 677.61m2. The play space proposed is broken down into the following age groups:

| Age Group | Play space requirement (sqm) | Play space provided (sqm) |
|---|---|---|
| Under 5 | 292 | 292.4 |
| 5-11 | 225 | 225.3 |
| 12+ | 160 | 159.89 |

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




*Overall Play Provision*

148. The applicant is proposing to provide all child play space on site for all age groups, meeting all the required play space per age range (when rounded).

This would include play spaces within all of the communal courtyard at first floor, within the roof terrace at 10th floor level and older play space at ground floor within the public realm.

149. The overall play space provision on site would be above the minimum play space requirements which is supported, providing high quality of spaces for children of all age ranges. Details of the play provision would be secured by condition and this would include a requirement for water and sand play within the play spaces. Overall, the quantum is considered acceptable and the play space provided would be of a very high quality.

### Public Open Space

150. Policy AAP4 of the draft Old Kent Road AAP requires that developments providing student housing must Contribute towards Public Open Space in the Old Kent Road area (at a rate of 5 square metres for every 2.5 student bedspaces) and Policy AAP9 sets out that all new development must deliver 5sqm of public open space per dwelling. As such, the proposals are required to deliver.

151. On this basis, the proposal is required to deliver 1,349sqm of overall publicly accessible open space, however, the AAP outlines that where this cannot be provided on site, a contribution would be sought for any shortfall. In this instance, the proposals include 556 sqm of open space, which generates a shortfall of 793sqm. Using the adopted Section 106 Planning Obligations and CIL SPD, a rate of £205 per sqm is required to deliver the shortfall off site, and as such, the proposals will require a financial contribution of £162,565 towards delivering this.

### Sunlight within proposed amenity spaces

152. BRE guidance for overshadowing to gardens and open spaces within a development recommends that at least 50% of any garden or amenity area should receive at least one hour of sunlight on 21 March. The playspace and communal amenity areas located on the first-floor podium and 10th floor terrace provide the external amenity sources for residents within the scheme. The applicants have tested the levels of sunlight within these spaces using the BRE guidance and this demonstrates that the first-floor podium and 10th floor terrace, owing to their predominantly south facing locations adhere to the BRE recommendations for sunlight amenity within developments.

## Student housing quality.

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

154. The Southwark Plan does not prescribe any minimum space standards with respect to student accommodation. Policy P15 “Residential Design”, which sets

out the standards for new homes generally and includes 17-point criteria, is clearly designed for conventional residential housing. Nevertheless, it is not unreasonable to expect student housing proposals to achieve some of those criteria, namely:

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

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

156. The proposals would provide two different typologies for the proposed student bedspace which would include 363 Studio bed spaces which would have an average size of 18.8sqm and 45 ‘Twodio’ rooms which are two bedrooms with one shared kitchen and bathroom which would provide a total of 90 bedspaces. The ‘Twodios’ would have an average size of 39.8sqm total (11.5sqm bed spaces). The proposal would also provide 24 wheelchair accessible rooms which would have an average size of 27.95sqm. The studios and Twodios are generously proportioned and would provide very good levels of residential amenity for the occupiers.

157. The bed spaces would be arranged with 16 studios and 2 ‘Twodios’ and one wheelchair accessible studio per floor from the 2nd to 22nd floors, with 9 studios, one ‘Twodio’ and one wheelchair accessible studio located on the 23rd to 25th floors.

158. All of the proposed student bed spaces have an efficient configuration, with all of the layouts submitted as part of the planning application include furnishings to illustrate how queen-sized beds, a desk and storage space could be accommodated in a way that would not be cramped or impractical for use.

159. The applicants have provided benchmarking against similar student housing schemes for the studio and room sizes and this demonstrates that the average studio sizes for the nearby consented schemes would range from 14sqm to 18.2sqm, which, when you compare the average room sizes within this development (18.8sqm) and the good size for the Twodio bedspaces, then the proposal would provide a very high level of amenity for the future student occupiers within this development.

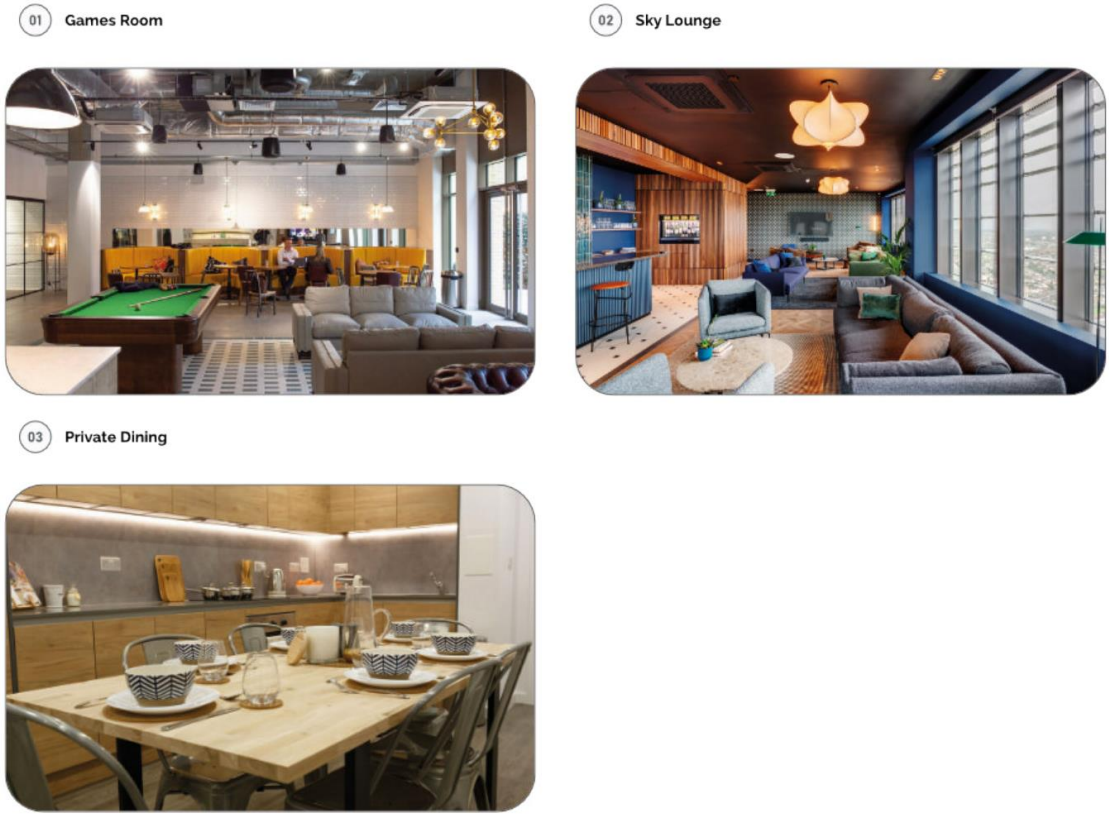
160. All of the accommodation typologies would achieve at least 2.5 metre floor to-ceiling heights, which is in accordance with Policy P15. This would contribute to the sense of space within these dwelling units.

161. The Building Regulations make clear that student accommodation is to be treated as hotel/motel accommodation for wheelchair specification purposes. As such, Policy E10(H) is the relevant policy to apply in assessing compliance

of PBSA wheelchair proposals, as has been clarified by GLA Practice Note 'Wheelchair Accessible and Adaptable Student Accommodation' dated November 2022. In respect of the 477 bedspaces proposed, 24 would be provided to M4(3) standards. Which represents 5% of the total number of bedspaces, the wheelchair unit provision would meet the numerical requirements of Southwark Plan Policy. In locational terms, the units would also meet policy requirements, being provided across various floors. This would help achieve social integration.

Internal Amenity

In relation to shared internal amenity, the proposals would provide three separate areas of shared amenity to be enjoyed by students, with the ground floor delivering the combined community café/amenity/co-working space for the student residents, whilst the first floor delivering further amenity spaces which include gym spaces, study area and a screening room. Further internal amenity is provided at 26th floor level with games rooms, private dining spaces and lounge areas. In total this would deliver 853.3sqm of internal amenity space, which would equate to 1.79sqm per student. The below image sets out precedent images of how some of the spaces at the 26th floor could be delivered.




As noted, the applicants have provided benchmarking against similar student housing schemes for both the studio and room sizes, but also for amenity spaces. This analysis outlines that the proposals compare very favourably to other consented student housing schemes in terms of thew overall internal amenity provision per student bedspace, with the comparable schemes

providing between 0.77sqm and 1.77sqm, and this proposal providing 1.79sqm of internal amenity space per bedspace, again demonstrating the high quality of the student accommodation proposed.

External amenity

In relation to external amenity for the student housing element of the proposal, a large roof terrace is provided at level 27 which would be 152.1sqm and would provide overall 0.32sqm of external amenity space per student. Furthermore, there are public open spaces/public realm provided at ground floor level which provides adequate access to outdoor space for all students.

Furthermore, as previously noted, there are also numerous leisure and recreation spaces available for students nearby, including Bramcote Park, Brimmington Park and Bridgehouse Meadows providing further convenient access to high quality outdoor spaces.

Conclusion on quality of residential accommodation – PBSA

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

## Design

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

## Site context

163. London Plan Policy D3 requires developments to make the most efficient use of land to optimise density, using an assessment of site context and a design-led approach to determine site capacity. This design led approach is also reflected in Southwark Plan Policy P18. In respect of site layout and public realm Southwark Plan Policy P13 requires developments to ensure that the urban grain and site layout take account of and improve existing patterns of development and movement, permeability and street widths; to ensure that buildings, public spaces, open spaces and routes are positioned according to their function, importance and use to ensure that a high quality public realm that encourages walking and cycling is safe, legible, and attractive is secured. The detailed design of all areas of public realm must be accessible and inclusive for all ages and people with disabilities as well as providing opportunities for formal and informal play and adequate outdoor seating for residents and visitors.

164. The proposed layout of the site would comprise of one urban block to the north of the site, a part 10, part 13 storey shoulder fronting Ilderton Road which contains the conventional housing and a part 23, part 27-storey tower block at the corner of Surrey Canal Road which contains the proposed student accommodation. The block typology aligns with the rectilinear nature of the site. The proposed tower block is articulated into two separate massing's reaching 27 storeys at the north and stepping down to 23 storeys to the south. This articulation reduces the bulk of overall perceived massing. The part 10, part 13 storey shoulder block provides a transition in scale to the frontage along Ilderton Road and will be in line with the shoulder height of emerging neighbouring development along Ilderton Road.

165. The proposed layout improves the relationship with surrounding streets providing increased active frontages. Residential entrances are setback from the north-western corner of the site onto Ilderton Road and Surrey Canal Road. Significant increases to the width of the pathway at this junction improves the public realm and pedestrian permeability, located in close proximity to pedestrian crossings and residential entrances. Improvements to the streetscape include the widening of the pavement along Ilderton Road to 3.1-3.8m with the integration of planting as a buffer between the highway and pedestrians. This also enhances the public realm as well as commercial and residential entrances areas including double height entrance lobby spaces with new external amenity and public realm to the northeast corner of the site.

166. The proposed typology re-locates the industrial warehouse space to the southern end of the site, with dedicated access from Rollins Street with internal yard and servicing space. Separate access routes are proposed to manage the reconciliation of uses, with a proposed residential access and servicing situated along Ilderton Road. The constraints of the site do not allow for a shared access between residential and industrial uses, due to safety concerns with pedestrians and a constrained site and the need to keep the industrial use operation separate from the residential. The industrial space would be required to be fitted out with heating, cooling and lighting and a sprinkler system would also be required as part of a s106 obligation.

Image – Aerial photo

Image: layout in context

Height scale and massing

Image: Elevations

167. London Plan Policy D9 provides policy requirements for tall buildings. The policy sets out a list of criteria against which to assess the impact of a proposed tall building (location/visual/functional/environment/cumulative). London Plan Policy D4 requires that all proposals exceeding 30 metres in height and 350 units per hectare must have undergone at least one design review or demonstrate that they have undergone a local borough process of design scrutiny.

168. Southwark Plan Policy P17 deals with tall buildings. The policy identifies this site as suitable for tall buildings as it is located within the Old Kent Road opportunity core area. The policy sets out a list of requirements for tall buildings of which the policy states that tall buildings must:

1. Be located at a point of landmark significance; and
2. Have a height that is proportionate to the significance of the proposed location and the size of the site; and
3. Make a positive contribution to the London skyline and landscape, taking into account the cumulative effect of existing tall buildings and emerging proposals for tall buildings; and
4. Not cause a harmful impact on strategic views, as set out in the London View Management Framework, or to our Borough views; and
5. Respond positively to local character and townscape; and
6. Provide a functional public space that is appropriate to the height and size of the proposed building; and
7. Provide a new publicly accessible space at or near to the top of the building and communal facilities for users and residents where appropriate.

169. Policy 10 of the Draft OKR AAP sets out a tall building strategy with the 'Stations and Crossings' reinforcing the proposed hierarchy of buildings. The three-tier strategy defines a clear building height strategy across the opportunity area. 'Tier One' buildings represent developments that exceed 20 storeys in height. These developments are proposed to be sited in the vicinity of the proposed BLE stations, to mark their city-wide significance and optimise the use of land in the most accessible locations. Mid height 'Tier Two' buildings propose building heights within the range of 16 to 20 storeys to mark places of local importance to help define their character and assist wayfinding. 'Tier Three' tall buildings up to 15-storeys will act as markers within the neighbourhood. The strategic locations of Tier One and Tier Three buildings assist in wayfinding and markers at a junction.

170. The policy states that the design of buildings should carefully consider their impact on the skyline and their relationships with the surrounding context, be of exemplary design and provide high residential quality where new homes are provided. The site is identified within the OKR AAP as having scope to provide a taller Tier 1 building given its location at the important junction between Ilderton Road and Surrey Canal Road, with there also being a previous consent on site for a building of up to 25-storeys in height. Given that context and the public benefits of the scheme, including provision of a significant amount of on-site affordable housing, it is considered that the tallest part of the building is line with ambitions for the site contained within the OKR AAP.

171. This mixed-use development forms a single urban block composed of a variety of strata; a 2-storey industrial podium to the south of the site, with a part 10, part 13 storey shoulder block containing residential uses and a 23/27 storey tower block located at the north edge of the site formed of student accommodation on the upper floors. The proposed shoulder block is considered to provide an appropriately scaled frontage onto Ilderton Road, responding to the surrounding context, and similar in scale to the previously consented proposals. A vertical tower is located to the north edge of the site reaching 27 storeys at its highest point and 23 storeys at its lowest. The massing of the tower is reduced through articulation of the urban form, stepping down in height to the south of the site has a slight reduction in the overall scale as perceived from the courtyard space. This articulation of the elevations contributes to reducing the perceived bulk from these views. While the massing and height of the proposal contrasts with the low-rise buildings adjacent to the site, it does not conflict with the prevailing pattern of development within the wider context. The proposal is considered to be in line with the tall building strategy outlined in the AAP and Policy P17 in the Southwark Plan.

172. The proposal provides an appropriate transition in scales to form a frontage along Ilderton Road and provides articulation to the massing of the development. Building frontages have been generously set back from the edge of the urban plot to create an increased public realm with the provision of landscaping and planters along the pathway. At the north-western corner residential entrances have been recessed to provide an improved public realm, and provides positive inviting entrances for residents, with a 2-storey lobby entrance. The proposed podium has been designed to give a strong street presence along Ilderton Road, increasing active frontages and providing

entrances to both residential and commercial use, from the primary road with a separate dedicated industrial entrance along Rollins Street.

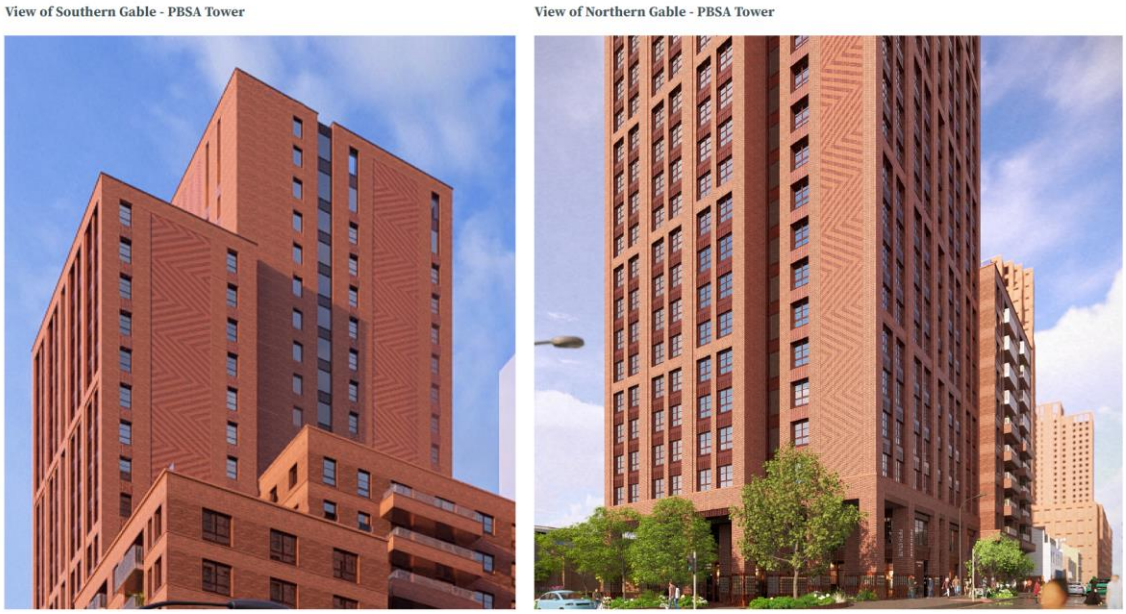
173. The design of the urban block takes into account the base, middle and top principles, providing articulation across the facades and block. Providing interest for immediate, mid-range and longer views as identified in the London Plan 2021. The railway line provides a physical barrier between the boroughs of Southwark and Lewisham. The tower will improve urban legibility, positioned along the eastern edge of the railway viaduct at the junction of borough boundary. The composition of the tower is expressed in a brick verticality, with a clear grid order which is resumed on the shoulder block. Deep reveals and recessed balcony corners accentuate architectural interest. The scale and robust quality of the brick columns relate to the industrial character of the area and the adjacent railway arches.

174. The two-storey base was established along Ilderton Road to allow for a distinct language of the entrances, community café and retail use, and to improve the relationship of the proposed development with adjacent terraces. Large cut-out setback and colonnade entrance to the student housing block adds to the public realm and wraps around the northwestern corner of the building. Whilst providing visual emphasise the entrance, establishing a street presence on the corner of Ilderton Road and Surrey Canal Road. The urban block has been setback to provide sufficient streetscape, pavement space and appropriate landscaping with public open space adjacent to the community café, providing significant improvements for the site.

175. In line with the draft OKR AAP, the design of the tall buildings would be exemplary, with careful consideration of their impact on the skyline. For the reasons set out above it is considered that the proposal accords with Policy P17 in terms of the principal requirements for tall buildings as well as Policy 8 of the Old Kent Road Area Action Plan. Additionally, this application was accompanied by a Heritage, Townscape and Visual Impact Assessment. The impact on protected views and heritage assets is discussed in the relevant section of this report.

## Architectural design and materials

Image: CGIs




## Landscaping, trees and urban greening

Image: Landscape layouts

176. Policy P59 of the Southwark Plan (Green infrastructure) states that major developments that are referable to the Mayor of London must provide new publicly accessible open space and green links. Additionally, developments should provide multiple benefits for the health of people and wildlife, and to integrate with the wider green infrastructure network and townscape / landscape, increasing access for people and habitat connectivity. Point 3 of London Plan Policy G1 (Green Infrastructure) requires Development Plans and Opportunity Area Planning Frameworks should identify key green infrastructure assets, their function and their potential function. They should also identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.

177. An indicative landscaping strategy is proposed for the site which outlines a high-quality approach towards hard and soft landscaping throughout. Extensive and appropriate planting and landscaping in the communal amenity areas and on the site, boundaries has been incorporated into the design to indirectly connect and enhance the Senegal Railway Banks SINC on the eastern boundary of the site.

178. At ground floor, the proposals would provide new hard landscaping surrounding the site, providing increased footpath widths to provide improved pedestrian facilities around the site edges, whilst also providing a new public open space in the form of public square adjacent to the railway line to the east of the site. Three new street trees would be provided along Ilderton Road, providing an improved green edge to the site. Adjacent to the public square, a further 7 new street trees would be introduced, creating a green edge around the new civic open space which is supported.

179. At the first-floor podium level, 26 new trees would be planted alongside generous planters providing defensible spaces between the edges of the terrace and private amenity spaces of the dwellings. This will provide an attractive, but useable environment within the amenity space for the residents, which is supported.

180. Conditions are imposed to ensure the quality, materiality and maturity of the planting illustrated in the landscape drawings is delivered thereby ensuring the success of the scheme. These will also include conditions on lighting and wayfinding to ensure legibility, safety and to minimise ecological impact.

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

182. The below image shows the overall landscape masterplan showing the public realm and planting at ground floor level, a large roof top amenity terrace for the residential affordable housing, and roof terraces on the upper floors for both the residential and student housing elements of the proposals.

## Urban Greening Factor

183. 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 0.4 which would meet the 0.4 target, the UGF would be achieved through the inclusion of intensive green roofs, rain gardens, flowering and grass planting, permeable paving where possible and extensive tree planting.

184. The proposals seek to maximise the urban greening score in accordance with Policy G5, and would achieve the interim target score of 0.4 which is considered a positive to the proposals, particularly given the site constraints. Officers are satisfied that the score of 0.4 is the maximum achievable and the intensively landscaped spaces are a positive aspect of the scheme.

## Ecology and biodiversity

185. An Ecological Appraisal (PEA) has been prepared by LUC dated November 2024. The PEA has identified habitats that are present on site are of negligible ecological value and require no specific mitigation for their removal. The report also outlines that the site contains some invasive species including Budleigh and Snowberry which would be removed from the site as part of the proposals.

186. The nearest designated site is the Senegal Railway Banks SINC, and the proposals include external lighting on the buildings. Lighting can negatively impact bats and their ability to forage and commute therefore mitigation will be required to ensure bats are not impacted by the lighting scheme. The mitigation includes the provision of sensitive lighting measures to be used to influence the lighting scheme, in order to minimise light spill. The external lighting scheme will be subject to a detailed condition.

## Biodiversity Net Gain

187. 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.

188. Based on the information submitted by the applicant, this site is considered to be required to deliver mandatory BNG. This will require the approval of a biodiversity gain plan before development has begun. This is because none of the statutory exemptions or transitional arrangements apply.

## Biodiversity Gain Hierarchy

189. 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.

190. The Biodiversity Gain hierarchy sets out a list of priority actions:

- first, in relation to onsite habitats which have a medium, high and very high distinctiveness, the avoidance of adverse effects from the development and, if they cannot be avoided, the mitigation of those effects; and
- then, in relation to all onsite habitats which are adversely affected by the development, the effect should be compensated by prioritising the enhancement of existing onsite habitats, creation of new onsite habitats, allocation of registered offsite gains and finally the purchase of biodiversity credits.

191. The draft Biodiversity Report submitted by the applicant has stated that the mandatory 10% BNG can be achieved onsite. This is in accordance with the Biodiversity Hierarchy.

192. The data below has been taken from the Biodiversity Net Gain Metric and Biodiversity Gain Plan submitted with the application:

- The baseline value of onsite habitats was calculated to be 0.17 habitat units.

- The onsite measures propose to deliver an increase of 0.49 habitat units to 0.66 which equates to a net percentage change of 284.13%.

193. Planning regulations require an assessment of whether the proposed habitat works to deliver biodiversity net gain onsite will deliver a significant increase in the biodiversity value of the site, compared to the pre-development biodiversity value. The distinctiveness, condition and size of the biodiversity habitat to be delivered are all considerations which must be balanced.

194. Non-significant enhancements are habitat enhancements whose loss will not significantly decrease the development's biodiversity value.

195. In determining whether the BNG to be provided as part of this development is considered to be significant, Government guidance (PPG Biodiversity, 2024) on determining whether BNG to be delivered on a development site sets out five factors. These are set out below.

| **Government Guidance on <u>Significance</u>;**<br><br>**Does the proposed habitat delivered contain;** | **Assessment** |
|---|---|
| Habitats of medium or higher distinctiveness in the biodiversity metric. | The following area-based habitats are being created which have a distinctiveness |

| | |
|---|---|
| | of medium:<br>Biodiverse green roof and Urban Trees. |
| Habitats of low distinctiveness which create a large number of biodiversity units relative to the biodiversity value of the site before development. | The low distinctiveness habitat vegetated garden proposes to deliver 0.14 units, and other green roofs proposes to deliver 0.08 units. |
| Habitat creation or enhancement where distinctiveness is increased relative to the distinctiveness of the habitat before development. | N/A |
| Areas of habitat creation or enhancement which are significant in area relative to the size of the development . | The total site area stated in the metric is 0.38 ha. Vegetated garden is proposed to cover 0.0622ha, and biodiverse green roofs are proposed to cover 0.0437 ha. |
| Enhancements to habitat condition e.g. from poor or moderate to good. | N/A |

196. The BNG to be provided as part of this development is considered to be significant. A S106 legal agreement will therefore be required to secure the biodiversity gain for 30 years. A monitoring fee will be required as part of the S106 agreement to cover the cost of periodic monitoring over 30 years. A Habitat and Management and Monitoring Plan will be required post-approval to set out the management arrangements.

## Design Review Panel

197. The Design Review Panel reviewed this proposal in June 2024. The panel accepted the general principles of the location of a tall building within this location, however questioned the overall quantum of development which was an uplift over the previously consented scheme. The panel asked the applicants to address the sustainability of the student accommodation, the massing on Ilderton Road; the quality of affordable housing; and to improve limited external space and to provide quality amenity and urban greening.

198. Following the revisions to the scheme, the proposals were not presented again to the DRP. Revisions were undertaken to the overall design and articulation of massing through the ongoing pre-application process, with improvements made to the overall massing and detailed design and articulation of the buildings.

199. Whilst, the overall scale is largely similar to the scheme presented to the DRP, the design has evolved well with this massing being broken down further and the detailed design being significantly improved. Officers have scrutinised the overall proposals throughout the pre-application and application process and are satisfied that the design is of a very high quality and the overall scale and massing is consistent with the existing permission and wider area ambition.

200. The proposal was subject to the scrutiny of the Old Kent Road Community Review Panel, the feedback from which is detailed in a later part of this report (along with an officer response to each item). Officers note that the CRP were generally comfortable with the overall scale, massing and design of the proposals and overall, officers are satisfied that the requirements of Policy D4 have been met.

## Designing out crime

201. 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.

202. 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, 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.

203. 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.

204. 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

205. Policy D12 of the London Plan expects all development proposals to achieve the highest standards of fire safety and to this end requires applications to be supported by an independent Fire Strategy, produced by a third party suitably qualified assessor.

206. A Fire Strategy was submitted with the application. The Fire Strategy includes a Planning Gateway One form, a requirement of the HSE for all referable planning application submissions. The fire strategy outlines that all relevant buildings would be served by at least two stairs for means of escape and fire service operations and at least one fire-fighting shaft. The HSE confirmed that for the fire strategy was acceptable for the purposes of the planning application, however noted some comments which would be required to be responded to during the Gateway 2 regulatory process. The applicant has noted these comments and confirmed that they would be responded to as required under the Gateway 2 process.

207. On account of the above, the relevant fire risk minimisation policies of the London Plan are deemed to have been satisfied, with due regard to the guidance within the Fire Safety London Plan Guidance 2022. A condition is recommended to ensure the construction and in-use operation of the building are carried out in accordance with the Fire Strategy.

## Heritage considerations

208. Policy HC1 of the London Plan 2021 advises that development affecting heritage assets and their settings should conserve their significance by being sympathetic in their form, scale, materials and architectural detail. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires local planning authorities to consider the impacts of proposals upon a conservation area and its setting and to pay “special regard to the desirability of preserving or enhancing the character or appearance of that area”. Section 66 of the Act also requires the Authority to consider the impacts of a development on a listed building or its setting and to have “special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses”. The NPPF 2024 states that ‘great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.’

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

- Nos. 864 and 866 Old Kent Road
- Nos. 880, 882 and 884 Old Kent Road
- Licensed Victuallers Benevolent Institution (Caroline Gardens)
- Licensed Victuallers Almhouses (Caroline Gardens)

210. There are some existing buildings located close to the site which are included within the draft Local list, whilst the draft OKR AAP also identifies buildings and features of townscape merit and buildings of architectural or historic interest. These building include the following:

- 209-225 Ilderton Road
- Penarth Centre
- Christ the King Chapel, 8 Manor Grove

Townscape and Visual Impact Assessment:

211. A Townscape and Visual Impact Assessment (TVIA) has been submitted in support of this application. A number of conservation areas and listed buildings fall within this radius, as do buildings on the local list. The 'townscape' element of the TVIA considers the impact of the proposed scheme from 10 different viewpoints and includes consideration of cumulative impact.

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

213. The London View Management Framework (LVMF) (March 2012) identifies a number of strategic views that are sensitive to change and require careful management if they are to be protected and enhanced. The types of strategic view are: London Panoramas; Linear Views; River Prospects; and Townscape Views. LVMF 2A.1 Parliament Hill: the summit (looking toward St Paul's Cathedral) is potentially sensitive to development at the application site, and as such the TVIA has tested the impact of the proposed development within this view.

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

## Archaeology

215. The site is within the 'Bermondsey Lake' Archaeological Priority Zone (APZ), which is designed to protect the palaeological environment and prehistoric archaeology recovered from the shoreline and relict fills of the large Late

Glacial Bermondsey Lake and the associated riverine geology and topology. The site is also close to the 'Old Kent Road' APZ, which has the potential to contain features associated with the former route of 'Watling Street', the major Roman road between London and Canterbury. When the New Southwark Plan is adopted, the site will lie within the newly extended 'North Southwark and Roman Roads' Tier 1 Archaeological Priority Area (APA).

216. Policy P23 of the Southwark Plan 2022 requires that applications affecting sites within Archaeological Priority Areas (APAs) will be accompanied by an archaeological assessment and a report on the results of a field evaluation of the site, including an assessment of the impact of the proposed development on the archaeological resource.

217. A Desk-Based Assessment has been submitted as part of this application. Southwark's Archaeologist has reviewed the DBA and raises no objection to the development given that the DBA adequately summarises the archaeological potential of the site. Southwark's Archaeologist recommends conditions requiring an archaeological evaluation, subsequent mitigation works and foundation design should be applied to the decision notice. In addition, any site investigation should be monitored by suitably qualified archaeologists. Much of the archaeological interest of this site comes from geoarchaeological deposits whose presence can be identified through monitoring of such works.

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

218. 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.

### Outlook and privacy

219. 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.

220. 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.

221. Within the roof terrace areas, defensible planted spaces would be provided where adjacent to windows and private roof terrace amenity areas in order to ensure that the privacy of the properties at these levels would be protected.

222. In relation to the outlook from the rear windows within 209-225 Ilderton Road,

the buildings have been designed to minimise the height of the rooftop amenity deck in order to reduce any sense of enclosure and ensure that outlook is retained from the rear windows within these properties. Overall, the layout of the building is largely similar to the extant permission and would ensure that outlook from these properties is retained.

## Daylight

223. Daylight and sunlight testing has been undertaken based on the BRE guidance. 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.

224. 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.

225. 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.

226. The daylight and sunlight assessment considered the potential impact on the following existing buildings:

- 179 Ilderton Road, Atar House
- Ilderton Primary School
- 140 Ilderton Road & 62 Hatcham Road, Shirley Chisholm Court
- 209-225 Ilderton Road
- 227-255 Ilderton Road
- 180 Ilderton Road
- Surrey Canal Triangle/ New Bermondsey (LB Lewisham ref: DC/11/076357/X, DC/13/085143 & DC/20/119706)

227. The remaining properties are either understood to be commercial or industrial use and/or located too distant from the Site to be materially affected and on that basis therefore were not assessed. The properties within 180 Ilderton Road would be fully complaint and as such are not assessed further within this report. The below tables and paragraphs however set out the impacts on the remaining properties.

VSC results:

| Address | Total windows assessed | Meet BRE guidance | Below BRE requirement | | | Total windows affected |
|---|---|---|---|---|---|---|
| | | | 20-29.9% reduction (Minor) | 20-29.9% reduction (Medium) | >40% reduction (Major) | |
| 209-225 Ilderton Road | 53 | 14 | 14 | 12 | 14 | 39 |
| 179 Ilderton Road Atar House | 56 | 48 | 2 | 2 | 4 | 8 |
| Ilderton Primary School | 33 | 30 | 3 | 0 | 0 | 3 |
| Shirley Chisholm Court | 156 | 70 | 10 | 28 | 47 | 86 |
| **Total** | **298** | **162** | **29** | **42** | **65** | **136** |

NSL results:

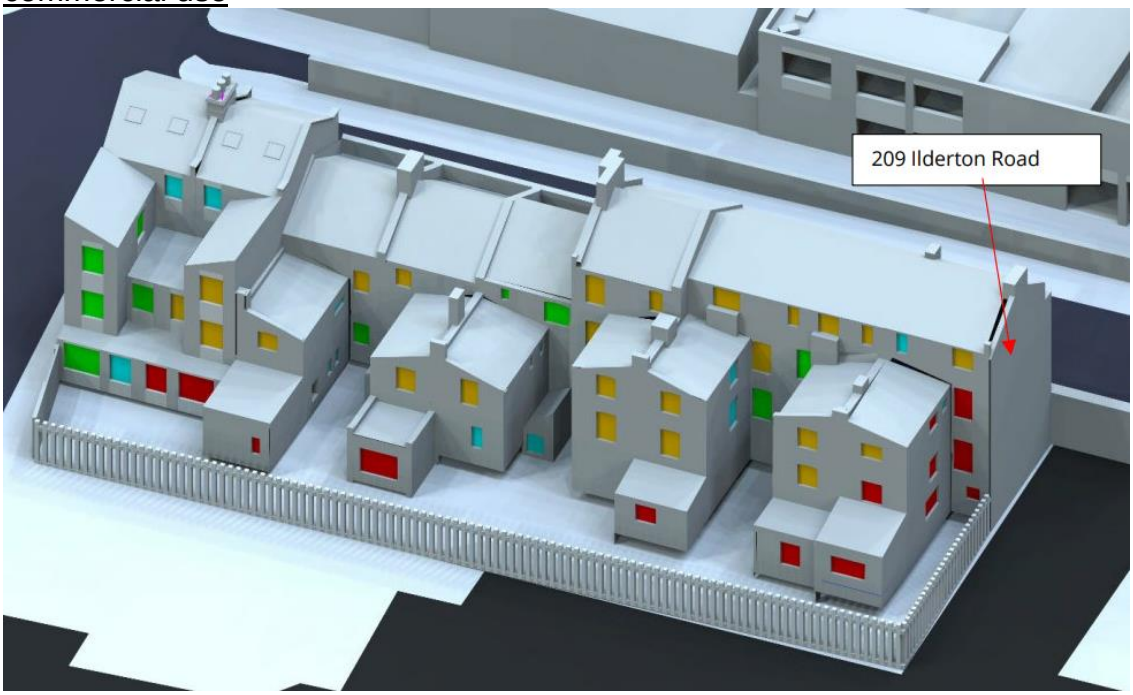
| Address | Total rooms assessed | Meet BRE guidance | Below BRE requirement | | | Total rooms affected |
|---|---|---|---|---|---|---|
| | | | 20-29.9% reduction (Minor) | 20-29.9% reduction (Medium) | >40% reduction (Major) | |
| 209-225 Ilderton Road | 47 | 19 | 6 | 10 | 12 | 28 |
| 179 Ilderton Road Atar House | 22 | 22 | 0 | 0 | 0 | 0 |
| Ilderton Primary School | 12 | 12 | 0 | 0 | 0 | 0 |
| Shirley Chisholm Court | 90 | 52 | 1 | 10 | 27 | 38 |
| **Total** | **171** | **105** | **7** | **20** | **39** | **66** |

209-225 Ilderton Road

228. In relation to these properties, are heavily self-constrained at the rear, due to the “outrigger” extensions directly adjacent one another and also situated closely to the boundary with the application site to the rear.

229. Post-development, 14 of the 53 windows analysed would either retain in excess of the default BRE targets or experience no noticeable change from their baseline VSC figure. Of the remaining windows, 10 are located at 209 Ilderton Road, the end terrace house with an unusually open outlook across the site. One is understood to serve a bathroom, and on this basis can be disregarded given its non-habitable room. The remaining windows are all located in the rear section of the properties, overlooking the site and any development on the site would likely have a detrimental impact. The below image sets out the windows impacted.

**Key:** green – satisfies advisory BRE examples; amber: satisfies contextually appropriate alternative target as set out in BRE guidance; red: below contextually appropriate alternative target; cyan: non-habitable rooms or commercial use




230. The NSL results showed a similar pattern, with 19 of the 47 assumed habitable rooms analysed (i.e. 40%) achieving the advisory BRE examples. This is higher because the NSL analysis takes into account the contribution of multiple windows, whereas VSC does not.

231. Whilst it is acknowledged that the proposals would result in some significant impacts on these neighbouring properties, the design in this area has been carefully considered, resulting in an immediate scale/ outlook comparable to the neighbouring terraces which have the more usual side extension to side extension arrangement. The design also includes for an area of new planting between the terrace and the covered yard and a generally improved outlook when compared to the current one i.e., an attractive and robust brick building with the majority of activity contained within.

232. Furthermore, the effects are not too dissimilar to the previously consented scheme ref: 21/AP/4757 and overall, the impacts on these properties are therefore considered acceptable on balance.

Atar House:

233. Atar House is located directly to the north of the site, across Pat Hickson Gardens. As seen in the image above, the elevation facing the site features recessed windows understood to serve living areas. These are obstructed both above and beside the window. In these types of situations, the BRE predict their default guidance may not be possible to achieve. Post-development of the subject site, 48 of the 56 windows analysed (i.e., 86%) would either retain in excess of the default BRE targets or experience no noticeable change from their baseline VSC figure. The 8 remaining windows are all located in the recessed areas discussed above, where they record materially lower baseline VSC values as a result.

234. The NSL results take into account conditions within rooms served by more than a single window and these all showed that all of the rooms tested within this development would meet the requirements of the BRE guidance and would receive high levels of daylight.

Ilderton Primary School:

235. A total of 33 windows serving 12 rooms have been assessed for VSC and NSL at this property which provides specialist temporary accommodation. 30 of the 33 windows would pass the VSC test within the school with all 12 rooms meeting the NSL requirements. Overall, there would not be any noticeable impact on the rooms within the school building.

Shirley Chisholm Court:

236. This property is a recently completed development located on the eastern side of Ilderton Road. The submitted daylight and sunlight assessment assess the impacts of the development on 156 windows which are situated within 90 rooms.

237. Of the 156 windows assessed using the VSC method, 70 would meet the VSC requirements, with 86 falling below the recommended levels. In the existing

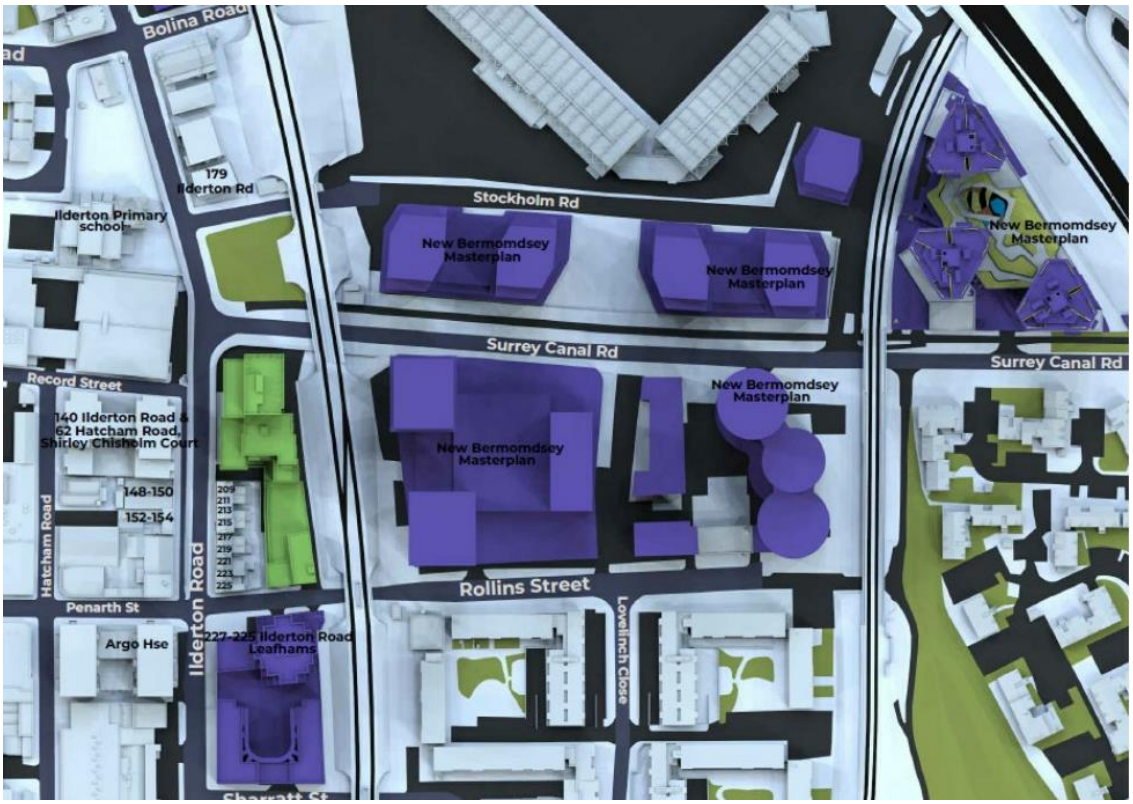
situation, the most heavily self-obstructed windows record single figure VSC values as low as 2.25%VSC as these windows are situated within recessed balconies. This is without any meaningful massing on the site and therefore demonstrates the self-impacting nature of its design. Within these most impacted rooms, there would be a reduction of just 0.6% actual VSC value which lower than consented as such whilst the proportionate impacts are significant, the real value are not significantly lower than the existing scenario. The below image shows the design of the recessed balconies within this site.

Image: Shirley Chisholm Court

238. In relation to the No Sky Line assessment, 52 of the 90 rooms assessed (i.e. 58%) would achieve the BRE advisory NSL which demonstrates a much higher compliance level than when looking solely at the individual windows. The remaining 38 rooms are comprised of 24 bedrooms (i.e. 63%) and 14 combined LKD rooms. The BRE guidance sets out that NSL to bedrooms is less important, given their mainly night-time use. Retained NSL values for the LKDs are due to their design, whereby they are served by a single window and over 5m in depth. Paragraph 2.2.10 of the BRE guidance states that “if an existing building contains rooms lit from one side only and greater than 5m deep, then a greater movement of the no sky like (NSL) may be unavoidable.” Given these deep room layouts, which means they have existing low levels in terms of NSL and as such any impacts result in a high proportionate reduction, overall the

issues with these buildings retained light levels is considered acceptable in this scenario.

Surrey Canal Site – New Bermondsey (London borough of Lewisham)




239. The above image shows the proposed 'New Bermondsey' development which benefits from a hybrid planning permission. Given that parts of the permission were in outline their fenestration are not available, and therefore a check was made of the proposals would potentially affect the outline proposed elevations in order to consider whether these would retain adequate skylight access.

240. The VSC façade renders confirmed retained VSC values on the extant consented potentially affected facades would range between 25%VSC-40%VSC. As such, the proposed development would not prevent adequately daylit dwellings to be designed here.

## Sunlight

241. 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.

209-225 Ilderton Road

242. Due to the orientation of the terrace on a broadly north-south axis, the vast majority of the potentially affected windows face within 0.8° of directly due east and as such the potentially affected windows serving the rear of the terrace achieve on average 16%APSH, compared to the BRE Guidelines advisory example of 25% in the existing scenario. With development in place, the average APSH for the terrace would be 11%, a small reduction of 5%APSH which is considered acceptable.

Shirley Chisholm House

243. As noted, a number of the windows facing the site are self-limiting in design as they are set behind inset balconies. In addition to this, the potentially affected windows serving this property are orientated due East which the BRE guidance outlines that “East and west-facing windows will receive sunlight only at certain times of the day. A dwelling with no main window wall within 90 of due south is likely to be perceived as insufficiently sunlit.” Given this, the proposals would not have a significant impact in terms of sunlight on these properties.

Atar House

244. Regarding sunlight impacts, the two bedrooms, located in the self-obstructing recessed areas of the elevation mentioned above, would experience slightly greater than 20% change to their existing APSH, again this is because the existing values are very low due to their design. Small actual/ shift changes in APSH therefore result in misleadingly high percentage value changes. As set out in the BRE guidance, the overall annual loss of APSH for these two-bedroom windows is no greater than 4% and therefore will not be adversely affected.

Surrey Canal Site – New Bermondsey (London borough of Lewisham)

245. Regarding sunlight impacts, the potentially affected facades are orientated west, therefore subject to the same considerations set out above, i.e. that any dwellings placed here are likely to be considered insufficiently sunlit given the lack of a more southerly orientation. Notwithstanding this, APSH façade renders confirmed retained APSH values would range between 20%APSH-40%VSC. Therefore, the proposed development would not prevent adequately sunlit dwellings to be designed.

## Overshadowing of amenity spaces

246. 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.

247. The main outdoor amenity space surrounding the height are located to the north of the site within Pat Hickson Gardens. This property would not be impacted upon significantly and all of the space within the gardens would continue to provide in excess of 2 hours of direct sunlight which is fully supported.

## Conclusion on daylight and sunlight

248. Overall, the effect of the proposed development on the daylight and sunlight to the surrounding properties would not be considered significant, with these buildings generally still achieving good access to daylight and sunlight for sites within an urban location such as this.

## Solar glare

249. The proposed materials on the façade of the commercial building will have a matte finish and therefore will not present a glare issue on the adjoining properties or adjacent railway line. Any advertisement on the commercial building will also be subject to a separate advertisement consent application. It is therefore considered that any harmful environmental effects caused by the development in respect of solar glare would be unlikely.

## Noise and vibration

### Plant noise

250. Plant (power, heating and cooling machinery) would be contained within the ground of the commercial use buildings and within the basement and at roof levels for the proposed PBSA and residential buildings. Both proposed buildings would also contain rooftop plant albeit the full details of plant are not currently known.

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

### Public noise nuisance

252. In terms of public noise nuisance from the development for surrounding residents, a Student Management Plan will be secured through the Section 106 Agreement to ensure the operation of the PBSA would limit sources of human noise disturbance to neighbours.

253. A gym is also proposed within the PBSA element of the development, which has the potential to generate higher levels of noise than the other amenity areas proposed. In order to ensure that noise transfer is limited a condition is recommended to ensure that the sound transfer would not affect the residential

units above.

254. The only other potential sources of public noise nuisance are the proposed industrial uses. It is noted that these uses have the potential to generate high noise levels, and the proposals do include residential uses facing towards the industrial uses at the southern end of the site. However, the industrial uses are all enclosed within the proposed buildings which, with suitable insulation, will ensure that the proposals can be designed in order to ensure that the residential elements achieve reasonable internal sound levels. Conditions are recommended to ensure that these internal noise levels are achieved, with a condition also recommended to ensure the external amenity areas also achieve reasonable noise levels.

255. Further to this, in order to limit any risk of public noise nuisance, it is recommended that opening hours limitations be imposed on these non-domestic units as follows:

07:00 to 23:00 on Mondays to Sundays (including Bank Holidays).

256. A separate condition is proposed to control the hours of servicing/deliveries to these non-domestic uses as follows:
- 08.00 to 20.00 on Monday to Saturdays; and
- 10.00 to 16.00 on Sundays and Bank Holidays.

257. Overall, subject to the conditions recommended, the proposals can provide suitable noise conditions for all of the proposed uses and that the co-location of the industrial and residential uses can co-exist effectively.

Vibration

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

## Transport and highways

259. 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”.

260. 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.

261. In assessing this application from a transport perspective, the site is located in an area that the council is considering pedestrian, and cycle changes to enable healthy streets. The proposals will not prevent these plans being delivered.

## Site layout

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

263. The site has a Public Transport Accessibility Level (PTAL) of 2 which is based on a scale of 0-6b where 6b represents the most accessible locations. This represents a relatively low access to public transport, however there is access to public transport nearby with a significant number of buses along Old Kent Road (approximately 550m to the south), with South Bermondsey train station also being located 400m to the north of the site. The site is well located for the Strategic Cycle Network with a new cycleway being delivered along Ilderton Road, and cycleways along Old Kent Road.

## Proposed Site Layout

264. The proposed future site layout will increase footway widths to a minimum of 3m clear, significantly improving the pedestrian movement along Ilderton Road. The proposal would also include the provision of a new service bay along Ilderton Road, and this will be detailed up and delivered as part of the S278 agreement. The Council is continuing to provide improved cycle routes from Rotherhithe to Peckham, this proposal does not impede on that project. The traffic management related to the site separates residential movement and industrial vehicle movement with separate access and servicing for the industrial uses from Rollins Street. Residential vehicular movement will be restricted to the entrance along Ilderton Road with commercial vehicular access focused from Rollins Street.

265. Pedestrian access for residents for the student housing block would be from the corner of Ilderton Road and Surrey Canal Road where there would also be access for the publicly accessible café, with access for the affordable housing coming from a separate secure access off Ilderton Road. Lift access is provided for both uses to the basement cycle stores.

266. Overall, the site layout is effective, separating the industrial and residential uses, and provides clear and legible entrances for pedestrians, cyclists and vehicles, which is supported.

Healthy Streets:

267. London Plan Policy T2 requires development proposals to demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with TfL guidance. These indicators are intended to inform design, management and use of public spaces in order to place people and people's health at the forefront of development decisions.

Enhancements to the pedestrian and cycle environment on-site

268. Given the set-back of the proposed buildings, the footways on both Ilderton Road and Sharratt Street will be widened together with new street trees and visitor cycle parking spaces on the street. Part of the widened footways will be adopted by the Council. These Healthy Streets improvements would be secured through a Section 38/278 Agreement.

Enhancements to the existing highways network adjacent to the site

269. As noted, the proposal would deliver widened footways along Ilderton Road, which would enhance the pedestrian environment of the highway network. It would also provide a new servicing bay within the site at street level which would provide enhanced servicing facilities for both this and surrounding properties.

270. Furthermore, the proposal would also provide further highways improvements, including the repaving of the footways, new kerbing fronting the development and carriageway tie-ins, on Ilderton Road, Surrey Canal Road and Rollins Street, refreshed kerb markings and upgraded street lighting and planting.

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

272. A contribution towards bus improvements in the area is also proposed of £637,200, in accordance with the OKR APP which will help improve access to public transport within the area. A contribution of £11,800 towards a cycle hire scheme will also be secured through the s106 which is supported.

Active Travel

273. In accordance with the requirements of the Healthy Streets Transport Assessment methodology, an Active Travel Zone (ATZ) assessment has been undertaken by the applicants and is included within the Transport Assessment.

274. As mentioned in earlier parts of this report, the planning application will bring forward significant improvements to the local pedestrian environment and the 'sense of place' more generally. As such, these works alone represent an adequate contribution towards the Healthy Streets agenda. They will make for a safer, more comfortable and more convenient environment for pedestrians

and cyclists.

275. The site is located close to Quietway 1 which links Greenwich with the West End. In addition, there are a number of cycle routes within close proximity to the site. These routes provide useful connections to key public transport interchanges, such as South Bermondsey, Elephant and Castle and London Bridge. Cycle parking will be provided within the site, with 358 long-stay cycle parking spaces for the student housing element of the development and 242 long-stay spaces standards. Both elements will include Sheffield stands and larger cycle spaces to provide a choice for cyclists using the storage areas. Separate storage areas are provided for the industrial element of the proposal to encourage cyclist commuting. The proposal also provides 6 cycle parking spaces within the public realm along Ilderton Road and a further 10 Sheffield stands (20 spaces) would be located within the under-croft parking area for visitors and one Sheffield stand located on Rollins Street outside of the industrial entrance. A condition is attached to this decision required detailed design of the cycling parking provision. As noted the S106 Agreement will include a contribution towards the delivery of a new Cycle Hire Docking station.

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

## Trip generation

277. Policy T4 of the London Plan requires development proposals to ensure the impacts on the capacity of the transport network are fully assessed and that any adverse impacts are mitigated. Policies P45, P49 and P50 of the Southwark Plan require developments to minimise the demand for private car journeys and demonstrate the public transport network has sufficient capacity to support any increase in the number of journeys by the users of the development.

278. As a borough, Southwark agrees with TfL that bus services will need to be increased in the Old Kent Road area ahead of the delivery of the BLE, in order to accommodate the demand generated by additional homes (as part of Phase 1 of the Delivery Plan) and additional jobs. As part of this agreement, TfL is required to report back to the Council with evidence that these pooled contributions are being spent appropriately; this reporting will serve as evidence that any further financial draw from future development is justified. As part of the agreement, TfL can require contributions from developments based on a tariff of £2,700 per proposed home (or equivalent for PBSA bedspaces), index-linked to March 2019.

279. 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 190 trips within the am peak and 63 within the pm peak for the student housing element, of which these would all be by active travel measures, including public transport, walking and cycling. In relation to the affordable housing elements, the proposal would be estimated to generate 50 trips within the am peak and 42 within the pm peak, with only two vehicular

movements anticipated. As such, the proposals would not result in a significant impact on the surrounding highway network, with thew surrounding public transport network able to accommodate the relatively small number of additional journeys.

280. In relation to the commercial uses, the proposal would generate approximately 15 trips within the am peak and 12 within the pm peak, with all apart from 2 trips being undertaken by sustainable travel modes.

281. It is considered the trip numbers generated by this planning application would not have any noticeable adverse impact on the local highway network when accounting for the bus contribution, together with the other mitigation secured such as the initiatives in the Travel Plan. These initiatives include the appointment of a dedicated Travel Plan Coordinator and the provision of cycling facilities.

## Servicing and deliveries

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

283. The proposal would provide one new servicing bay along Ilderton Road, which would accommodate the majority of servicing requirements for the residential uses, and larger servicing requirements for the industrial uses, with smaller deliveries for this use being accommodated within the industrial building from Rollins Street. Further to this, two small servicing and maintenance bays would be provided within the under-croft parking area for the residential elements and community café uses of the proposals. The anticipated daily servicing requirements would be for 47 vehicles arriving and departing from the site. The proposed servicing arrangements are considered acceptable to accommodate this level of servicing vehicles effectively, which is acceptable.

284. Given the provision of the new on-street delivery bay, officers recommended that A Road Safety Audit (RSA) should be undertaken in order to ensure that there would not be any wider impacts on the highway network as a result of its provision. Following these comments, an RSA has been undertaken for the layby, and this no issues or concerns regarding highway safety adjacent to the Ilderton Road/Surrey Canal Road junction were identified.

285. In order to ensure that on-street servicing and deliveries do not negatively impact on the highway network, a condition will be required to submit a finalised delivery and servicing management plan by condition and will also be required to enter into Delivery Service Plan Bonds against their baseline figures for all daily servicing and delivery trips. This will be secured within the s106 legal agreement.

## PBSA move-ins and move-outs

286. Students moving in and out of PBSA can generate a significant demand for

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

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

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

## Refuse storage arrangements

288. The proposal would provide separate refuse areas for the student housing, affordable housing and commercial elements which is appropriate. All bin store areas would be within the required 30m distance from the cores to the refuse storage areas. The residential bin stores will provide for general waste, recycling, bulky waste and food waste and would be located within 10m of waste collection location, where dropped curbs would be provided to enable loading of waste.

289. The ground floor design proposes a waste collection (bin holding) areas within the demise of the building adjacent to the proposed collection areas. Refuse collection for the residential, PBSA, community café and flexible commercial elements of the scheme are proposed to be carried out from the proposed layby at the Ilderton Road frontage of the site. Refuse collection for the light industrial unit would be undertaken from the kerbside at Rollins Street.

290. The affordable housing waste collection would occur once a week and the applicants have provided sufficient capacity which exceed the Councils Waste Management Guidance Notes for Residential Development (2014) which is supported. In relation to the PBSA element, which would include storage and collection for the community café, it is proposed that the waste strategy would involve collections twice weekly by a private collection service

291. Separate waste storage is provided for the light industrial element of the proposals, and this would be collected by a bespoke waste collection service.

292. Notwithstanding this, the finalised refuse storage arrangements shall be conditioned alongside a finalised delivery and service management plan.

## Car parking

293. Policy T6 of the London Plan requires developments in locations with existing and future high public transport accessibility to be car-free, save for adequate parking for disabled people. Specific requirements for different uses are set out in Policy T6.1 through to Policy T6.4, while Policy T6.5 deals with non-residential disabled persons parking.

294. Southwark Plan Policy P54 echoes the London Plan, promoting car-free development in zones with good public transport accessibility. It requires car-free non-residential proposals in CAZ locations, and for any disabled parking to be provided on-site and supported by EVCPs.

295. The proposal would be car free, with the exception of the provision of four blue badge parking bays for the residential elements of the proposal and one blue badge bay for the light industrial use. However, it is noted that two servicing and maintenance parking spaces would be provided within the under-croft area.

296. Three of the blue badge bays would be delivered for the affordable housing within the site, which would equate to an on-site provision of 3% of the total number of homes which would accord with the requirements of policy T6 of the London Plan.

297. In terms of the student housing element, one blue badge bay would be provided within the under-croft parking area. The Southwark Plan requires a maximum of one car parking space per wheelchair accessible unit, which for this application would equate to a maximum of 8 (applying a 1:3 ratio to the PBSA wheelchair units). However, through working on other applications for PBSA developments, officers understand that any students with mobility needs which require them to have a motorised vehicle will be placed in accommodation on or immediately next to university Campus', and as such these students would not need to have a personal vehicle and can easily access campus facilities and their associated course classes. On this basis, officers accept that 1 Blue Badge parking bay would be suitable for this element of the scheme.

298. One space would be provided for both the community café and light industrial elements of the proposals which would meet the requirements of the London Plan.

299. However, it is noted that the proposed blue badge parking would not be supported by EV charging points in this instance. This is due to the fire safety requirements to ensure that the undercroft parking areas would need to be fitted with large sprinkler systems, and in this instance the additional basement capacity required to facilitate this would result in large sustainability implications for the development. In order to overcome this, the applicants have proposed to provide a financial contribution towards providing two on-street EVCP’s either along Ilderton Road or within a neighbouring road. This approach has been discussed with the Councils highways team and transport policy teams, and on balance, these works are considered acceptable to mitigate the fact that there

would be no on site EVCP's.

## Cycle parking and cycling facilities

300. London Plan Policy T5 sets minimum cycle parking standards for different uses. Southwark Plan Policy P53 sets out requirements that are generally higher than the London Plan standards.

301. The applicants are proposing a total of 358 long-stay cycle parking spaces for the student housing element of the development and 242 long-stay spaces for affordable housing residential element of the proposal. It would also provide 10 long stay spaces for the industrial element of the proposal. The proposals would exceed the requirements of the Southwark Plan 2022 in relation to the affordable housing residential and industrial uses which is supported.

302. In relation to the student housing element of the proposals, the Southwark plan requires that one cycle parking space is required for each bedspace proposed. As noted, this proposal would provide 358 long stay spaces for students which would fall short of the required 477. However, the London Plan requires that 0.75 spaces are provided per bedroom, and the proposals would meet that requirement on site.

303. The applicants have provided a note that they have surveyed 50 purpose-built student housing developments within London in order to establish the take up of cycle parking within these developments. The Transport Statement notes that on average, the take up within these developments has been approximately 0.2 cycle spaces per bedroom and notes that this is due to the temporary nature of residence at student accommodation and the likelihood of there being overseas students being present on-site. This is noted, and on balance the evidence that has been provided is sufficient to evidence why there is a shortfall in cycle spaces when considered against the Southwark Plan requirements. As the cycle storage would meet the London Plan requirements, this is considered acceptable.

304. The TA also notes that cycle parking for the development's ground floor flexible Class E use would be provided to the standards of the Southwark Plan and would be located within the unit to which the cycle parking relates. The provision would be made as part of the unit's fit out and details of this will be secured by condition.

305. In relation to short stay cycle parking spaces, the proposal would provide three Sheffield stands which provides 6 cycle parking spaces within the public realm along Ilderton Road and a further 10 Sheffield stands (20 spaces) would be located within the under-croft parking area for visitors and one Sheffield stand located on Rollins Street outside of the industrial entrance.

306. The Southwark plan requirements for short stay spaces are for one visitor space per 10 dwellings, 1 space per 10 bed spaces and 1 space per 500sqm of industrial floorspace. In total, that would require 60 short stay cycle parking spaces, which the proposals fall short of. When looking at the London Plan requirements, the proposals would require 17 short stay spaces

### Improving access to cycle hire options

307. Given that the development would introduce 477 students upon full occupation, and 79 residential dwellings the applicant has agreed to contribute £11,900 (index linked) towards expansion of one or more TfL (Santander) cycle docking stations in the vicinity of the site. To be secured in the Section 106 Agreement, this contribution would meet the requirements of Policy T5 of the London Plan and Policy P53 of the Southwark Plan.

## Environmental matters

### Construction management

308. The applicant has submitted an Outline Environmental Construction Management Plan explaining how construction activities will be managed to minimise neighbour amenity, environmental and highway network impacts. This document has been reviewed by the relevant transport and environment consultees, who have deemed it to be a satisfactory framework document.

309. In order to ensure that increases in traffic, noise and dust associated with the demolition and construction phases of the development are minimised, a Final Construction Environmental Management Plan and a Construction Logistics Plan are to be required by condition. The applicant has also agreed to pay a sum of £9,440 to the Council's Highways Network Management to fund their work in monitoring adherence to the CEMP through the demolition and construction phases.

### Water resources and Flood risk

310. 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.

311. 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.

312. 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. Concerns have been raised by neighbouring residents regarding increased risk

of flooding.

313. 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.

314. 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 residential amenity spaces and ancillary residential spaces at basement level which are classified as ‘more vulnerable’ uses under the NPPF.

315. 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.

316. Although the site is allocated for development in the Southwark Plan, the proposed development includes a basement and other uses within the building which were not considered when the site allocation was being prepared. 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.

317. 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. The Environment Agency has advised that they have no objection to the application, because its most recent flood modelling demonstrates that the site is not at risk if there were to be a breach of the Thames flood defences, with no sleeping accommodation at ground floor level. A condition was recommended in relation to water source contamination which has been included within the recommendation. Thames Water have also

commented on the application and raised no objections, subject to the imposition of a piling method statement condition which has been included within the recommendation.

## Sustainable urban drainage

318. The applications have provided a proposed surface water drainage strategy, which sets out that the proposal is to provide rainwater gardens to reduce the surface water flows and to provide attenuation tanks below ground before connecting into the sewer systems along Rollins Street and Ilderton Road. The discharge rate from the proposed development will be restricted as far as practicably possible, however it would fall slightly short equivalent greenfield runoff rate for the 2, 30 and 100-year plus climate change storm events. This is due to the constraints of the site, however it would provide significant improvements of 94% from the existing runoff rates from the current site which discharges unattenuated to the existing sewer network and therefore would help significantly reduce local surface water flood risk.

## Land contamination

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

320. The ground conditions at the site are anticipated to comprise varying thicknesses of hardstanding over superficial deposits of Alluvium and the Kempton Park Gravel Member, overlying a small strip of Thanet Formation bedrock in the south beneath which is the Lewes Nodular Chalk Formation. Made Ground is anticipated to be present on site due to historical developments in the south and an infilled canal along the northern boundary. Additionally, significant potential pollutant linkages have been identified, such as the infilled canal, unspecified tanks, underground fuel storage tanks, and timber yard on site which have the potential to have an impact on site.

321. Southwark's Environmental Protection Team (EPT) has reviewed the Phase 1 assessment and following review recommends that a Phase 2 site intrusive investigation is undertaken before any works commence on site. The recommended condition is attached to the recommendation.

322. The Environment Agency have reviewed the proposals in relation to contaminated land and noted that it is possible to suitably manage the risk posed to controlled waters by this development. Further detailed information will however be required before built development is undertaken, which is secured by condition.

323. Given the above, it is considered that any contaminated land can be properly treated and made safe before development of the site, and as such the long-

term health of future users or occupiers of the site can be suitably mitigated.

## Air quality

324. 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.

325. 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.

326. An Air Quality Assessment compiled by Tetra Tech Consulting has been submitted with this application which assesses the potential impacts both during construction phase and at operation stage once the development is completed.

327. During the demolition and construction phase, the impacts from PM10 and dust were assessed with regards to current LBS, GLA and IAQM guidance. The statement does state 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.

328. In relation to the completed development, the assessment concludes that pollutant concentrations are predicted to be below the relevant air quality objectives and the proposed development, once operational, will be air quality positive. Southwark’s EPT Officer has reviewed the AQA and raises no objection to the information contained within the assessment.

## Wind

329. The applicants have provided a wind microclimate report, in which 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 Proposed Development with Existing Surrounding Buildings;
- Configuration 3: The Proposed Development with Cumulative Surrounding Buildings;
- Configuration 4: The Proposed Development with Proposed Landscaping, Wind Mitigation Measures and Existing Surrounding Buildings; and

330. Prevailing winds are from the southwest throughout the year albeit with some northeast 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 when looking at the proposed and cumulative impacts from the proposal.

331. The assessment goes on to demonstrate that the proposed development, with mitigation measures added, which include the addition of a 10m tall tree, setbacks and recessed facades would ensure that all areas within the ground floor and at roof amenity spaces would ensure that all amenity spaces would be suitable for sitting or standing. In relation to public realm, whilst there will be some spaces which would only be suitable for walking or strolling, these are public footpaths along Surrey Canal Road and as such would still be suitable for the use. There would be no locations which would be considered as uncomfortable.

332. As such, 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 in terms of wind shear as the image below shows.

## Energy and sustainability

### Whole life cycle and carbon capture

333. 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.

334. 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.

335. 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.

## Carbon emission reduction

336. 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.

337. 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)

338. 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.

339. 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.

340. Measures under this category would result in a 79% reduction in carbon emissions for the residential element, 27% for the student housing element and 40% for the commercial elements. However, overall, this would exceed the 15% requirement set out in the London Plan.

## Be Clean (supply energy efficiently)

341. Having minimised the demand for energy, the energy systems have been selected in accordance with the hierarchy for selection:
I. Connect to an existing decentralised energy network; then
II. Be future-proofed to connect to a planned decentralised energy network; or
III. Implement a site-wide low carbon communal heating system; and
IV. Explore and evaluate the potential to oversize the communal heating system for connection and supply to adjacent sites and, where feasible be implemented.

342. However, the submitted energy strategy sets out that there is no current district heat network within the immediate vicinity of the development, but there is a proposal for one. The applicants have set out that the proposal would ensure that the development will be made futureproof to ensure that connection to any future DHN is feasible and achievable through the addition of simple in-takes into the proposed plant room. Given that the initial strategy would not include the connection to the DHN, there would be no savings at be clean stage initially.

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

343. The current proposal for the development is to maximise available roof space for the provision of solar Photovoltaics (PV). There is limited roof space due to the massing of the building, with a small footprint relative to the building height, and the provision of rooftop amenity space, however, space has been identified for solar PV provision and the provision of Air Source Heat pumps to provide heating and hot water.

344. The proposed implementation of low and zero carbon technologies, a combination of solar PV serving the units, and a ASHP system for the commercial spaces, provides an overall site-wide carbon reduction of 5% for the residential element, 9% for the PBSA development and 10% for the non-residential elements of the proposal.

## Be Seen (Monitor and review)

345. 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:

346. As noted above, the applicants have ensured that all carbon reductions have been maximised on site providing overall cumulative savings above Building Regulations of 84% for the residential element, 35% for the PBSA element and 50% for the non-residential elements, resulting in a large carbon saving above the required policy level. This results in a site-wide carbon saving of 68% above Building Regulations.

347. The development adheres to the energy hierarchy, heating hierarchy and cooling hierarchy. The systems specified represent the best available for the development to save carbon while future proofing to allow connection to the proposed SELCHP DHN, should this become possible in the future. The PV system is the largest that the roof can accommodate. Overall carbon savings over the notional Part L baseline represents a 67% carbon reduction, well in exceedance of the 35% and 40% minimum reduction mandated by the GLA and Southwark, respectively.

348. However, in order to ensure that the proposals would be fully carbon neutral, a financial contribution is required to secure off-site carbon off-setting measures in order to achieve 'zero carbon' through an offset payment, in line with the London Plan and Southwark guidance. The overall offset amount required to be subject to the s106 for the application site is calculated to be £115,797.

## Circular economy

349. 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.

350. 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.

351. 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 and a planning condition requiring a Circular Economy Statement to be agreed in writing by the Council prior to commencement of any works on site is proposed. Subject to the condition, the submitted details meet the requirements of London Plan Policy SI7 which is considered acceptable.

## Whole life carbon

352. 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.

353. 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.

354. A condition is attached to the decision notice regarding an updated Whole Life-Cycle (WLC) Carbon Assessment demonstrating compliance with Part F of Policy SI 2 - Minimising greenhouse gas emissions of the London Plan 2021. The final wording of the condition will be agreed with the GLA during the Stage 2 process post committee.

## Overheating

355. 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.

356. 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).

357. 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 mechanical and natural ventilation measures and a strategy to minimise internal heat gains. The submitted details are considered appropriate, and following further discussions with the GLA, they have also confirmed the acceptability of the overheating strategy for the development.

## BREEAM

358. 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.

## Health Impacts

359. The evidence base to the OKR APP includes a health impact assessment (forming part of a wider Integrated Impact Assessment), the conclusions of which are threaded through and underpin the content and policies of the draft AAP.

360. Nonetheless, a site-specific health impact assessment has been provided with the application, prepared by Volterra. The assessment considers how the Proposed Development could impact factors that can influence human health and wellbeing and suggests ways in which potential ways in which positive health impacts could be enhanced through the design of the development.

361. It outlines that the proposal would deliver positive impacts in relation to accessibility and transport through measures such as widening of the footpaths, providing enhanced cycle facilities and encourage use of public transport through contributions towards bus improvements, whilst also providing crime reduction measures through delivering secure by design principles.

362. The proposal would also provide positive benefits to access to work by increasing job opportunities within the site and delivering social cohesion through the delivery of affordable housing and the delivery of a community café.

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

## Economic impacts

364. London Plan Policy E11 requires development proposals to support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases. This requirement is also covered by Southwark Plan Policy P28, with the methodology for securing these opportunities prescribed by the Council's Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015 with 2020 Update).

365. In accordance with the policy framework, there would be a requirement for this development to deliver training and employment during the construction phase only. 14 construction industry apprentices, 59 short courses and 59 sustained jobs for unemployed Southwark Residents would be required. These would all need to be filled by the applicant in accordance with a Construction Phase Employment, Skills and Business Plan. These obligations will be secured through the Section 106 Agreement.

366. The existing site was formally occupied by Jewson builders' merchants, however they have subsequently vacated the site as it was no longer required for their use. It contains approximately 658sqm (GIA). The remainder of the Site consists of 2,479sqm of external yard space. Applying the metrics advised by the Homes and Communities Agency Employment Density Guide, the existing warehouse uses currently have the potential to employ a combined total of approximately 9 people, albeit that with the large external storage yard, it is likely that the employee numbers could be higher, however given the poor and deteriorating quality of the buildings, any prospect of re-use would be limited.

367. The applicants have provided an economic impact statement which states that the proposed development would deliver over 1,669 sqm (GIA) of industrial and flexible floorspace, including 198 sqm affordable workspace at the Southern element of the site. In addition to this, there would be 98sqm of flexible E class space with further jobs being created through the proposed student housing. Overall, the proposed development is expected to support approximately 75 full time equivalent jobs. This is equivalent to approximately 80 jobs when accounting for part time working patterns.

368. Overall, the proposed development would represent an uplift of up to 66 potential jobs and 75 currently based on the site's current employment given the premises are vacant now. It would satisfy the aims of the London Plan and the Southwark Plan in creating new jobs within the Opportunity Area and is considered a positive aspect to the scheme.

Television, radio and telecommunications networks

369. The NPPF requires local planning authorities to consider the potential for new development to interfere with broadcast and electronic communications services, and to mitigate this adequately. Part C of London Plan Policy D9, which is concerned with the functional impacts of tall buildings, echoes this, requiring that "buildings, including their construction, should not interfere with […] telecommunication".

370. Proposed buildings that are tall and/or broad, and in particular this proposal have the potential to reduce coverage of mobile phone networks. The applicants have provided an Electromagnetic Interference Assessment with the application which outlines that the proposals would generally not result in any impacts in relation to TV radio and mobile phone networks, however that there may be some highly localised and minimal impacts as a result of the development. Arqiva has not objected to the proposal. On this basis, it is not considered that there would be any harmful impacts on wider telecommunications equipment and is considered acceptable.

## Aviation

371. The NPPF recognises the need for new development to maintain the national network of general aviation airfields, and their need to adapt and change over time. Part C of London Plan Policy D9 requires tall buildings not to interfere with aviation or navigation.

372. No consultation response has been received from the Civil Aviation Authority and NATS has not objected to the proposals.

## Digital connectivity infrastructure

373. The NPPF recognises the need to support high-quality communications infrastructure for sustainable economic growth and to enhance the provision of local community facilities and services.

374. To ensure London's long-term global competitiveness, Policy SI6 "Digital Connectivity Infrastructure" of the London Plan requires development proposals to:

- be equipped with sufficient ducting space for full fibre connectivity infrastructure.
- achieve internet speeds of 1GB/s for all end users, through full fibre connectivity or an equivalent.
- meet expected demand for mobile connectivity; and
- avoid reducing mobile capacity in the local area.

375. The applicants Electromagnetic Interference Assessment confirms that the proposed development will have sufficient ducting space for full fibre connectivity in line with London Plan Policy SI6 which is supported.

## Planning obligations (S.106 agreement)

376. IP Policy 3 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

377. 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.

| Planning Obligation | Mitigation | Applicant Position |
|---|---|---|
| Affordable housing | Delivery of 40% on-site affordable housing. This equates to 79 Affordable homes consisting of 59 social rented properties and 20 intermediate properties. This equates to 242 habitable rooms for social rent and 76 habitable rooms intermediate. | Agreed. |
| Viability Review | Early-stage review should the development not come forward within 24 months. | |
| Wheelchair accessible housing | 24 wheelchair accessible student beds and 7 wheelchair accessible dwellings (total hab rooms of 32) 3 x 2B4P and 4 x 3B5P | |
| Public Open Space Provision / In-Lieu | Provision of on-site open space of 830sqm | |

| | | | |
|---|---|---|---|
| Contribution | and a contribution of £162,565 towards delivering new public open space off site. | | |
| Community improvements | Contribution of £30,000 to be made to Ilderton Primary School for upgrades to their playground. | | |
| Construction Phase Employment: Jobs/Contributions | This development would be expected to deliver 59 sustained jobs to unemployed Southwark residents, 59 short courses, and take on 14 construction industry apprentices during the construction phase, or meet the Employment and Training Contribution.<br><br>The maximum Employment and Training Contribution is £283,550 (£253,700 against sustained jobs, £8,850 against short courses, and £21,000 against construction industry apprenticeships). | | |
| Affordable workspace | delivery of 12.6% of the flexible industrial floorspace which is either 198sqm GIA as on site affordable workspace | | |
| Car club | For affordable housing tenants and commercial tenants to provide 3 years membership | | |
| Electric vehicle charging point contribution | £15,500.00 towards off site delivery. | | |
| Parking Permit Restriction | Future residents to be restricted from applying for parking permits. | | |

| | | | |
|---|---|---|---|
| Construction Environmental Management Plan<br>S278 works | Construction plan monitoring - £9,440<br><br>Repave the footways, including new kerbing fronting the development and carriageway tie-ins, on Ilderton Road, Surrey Canal Road and Rollins Street, using materials in accordance with SSDM.<br>4. Refresh road markings following kerb installation and carriageway tie-in works.<br>5. Construct the new vehicular entrances on Ilderton Road and Rollins Street in accordance with SSDM standards.<br>6. Reinstate redundant vehicle crossover on Rollins Street as footway in accordance with SSDM standards.<br>7. Construct the new loading bay on Ilderton in accordance with SSDM standards and provide access arrangements such as a dropped kerb construction within the proposed Ilderton Road loading bay to accommodate refuse collection etc.<br>8. Promote all necessary Traffic Regulation Orders including restrictions for the proposed loading bay on Ilderton | | |

| | | | |
|---|---|---|---|
| | Road.<br>9. Upgrade street lighting within the vicinity of the development to current LBS standards.<br>10. Install 2 no. new street trees and associated tree pits on the footway on Ilderton Road. | | |
| Delivery and Servicing Plan Bond | DSP Bond - £23,600. Delivery And Servicing Nonrefundable Deposit -£1,600 | | |
| Cycle Club Scheme | TfL Cycle Hire Docking Station Contribution - £11,800 | | |
| Travel Plan | Travel Plan Monitoring | | |
| Bus contribution | Bus Services contribution - £637,200 | | |
| Archaeological monitoring | £11,171 Monitoring fee | | |
| Carbon Offset Fund Contribution | £115,797 | | |
| Energy | District CHP - Futureproofing for Connection | | |
| Biodiversity Net Gain | BNG - significant provision. The baseline value of onsite habitats were calculated to be 0.17 habitat units.<br>The onsite measures propose to deliver an increase of<br>0.49 habitat units to 0.66. | | |

378. In the event that an agreement has not been completed by *October 31st 2025*, the committee is asked to authorise the director of planning to refuse permission, if appropriate, for the following reason:

379. 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)

380. Section 143 of the Localism Act states that any financial contribution received as community infrastructure levy (CIL) is a material 'local financial consideration' in planning decisions. The requirement for payment of the Mayoral or Southwark CIL is therefore a material consideration. However, the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport invests in London as a whole, primarily Crossrail. Southwark's CIL will provide for infrastructure that supports growth in Southwark

The site is located within Southwark CIL Zone 2, MCIL2 Band 2 Zone. Based on the floor areas provided in the applicant's CIL Form 1 dated 26-Nov-2024 and Schedule of Accommodation dated 19-Nov-2024, the gross amount of CIL is £7,057,659.47 (pre-relief). Subject to the correct CIL forms being submitted on time, CIL social housing relief of approximately £3,131,675.86 can be claimed for a number of types of affordable housing. Thus, the resulting CIL amount is estimated to be £3,925,983.61 net of relief. It should be noted that this is an estimate, floor areas will be checked and measured when related CIL Assumption of Liability and Relief Claim Forms are submitted, after planning approval has been secured.

## Other matters

381. No other matters identified.

## Community involvement and engagement

### Development Consultation Charter

382. This application was accompanied by a Statement of Community Involvement, and engagement summary confirming the public consultation that was undertaken by the applicant during the pre-application phase. The SCI sets out that that consultation began in April 2024 with members of the Bonamy and Bramcote TRA after which a website was set up and initial flyer distribution and public events including a public exhibition and door knock was subsequently undertaken in July 2024 as part of the initial round of consultation.

383. A second round of consultation was then undertaken in September 2024, with updates to the dedicated website, additional flyering and newsletters, followed by two further public exhibitions in October 2024, in addition to further door knocking, stakeholder meetings with local stakeholder and newsletters.

384. Overall, the SCI notes that letters were sent to circa 3,544 addresses close to the site to invite neighbours to consultation events on the proposals and advise about the proposal's website, where comments could be submitted. In total 144 individual residents visited the proposals website and noted that following comments were received:

• Acknowledgement of the need to re-develop the currently underutilised site.
• Support for the provision of affordable housing on-site, at a rate of 40%.
• Support for the public realm proposals, including the provision of a new community garden.
• Suggestions as to how the flexible class E unit at ground level off Ilderton Road could be used, which included a convenience store, pharmacy and events space.
• Some local residents at the consultation events said that they were supportive of the proposed employment floorspace due to local jobs being created.
• Some questions about the need for PBSA in the area, with respondents stating that a number of student accommodation developments are already being built in the area. An exhibition board which contained information regarding the need for PBSA in London helped to answer these questions.

385. The SCI notes that the proposals have responded to a number of the comments raised by local residents, including clarifying the proposed E-class use and providing justification for the proposed student accommodation within the site.

386. 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

387. 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

388. **Land Use -** The proposed optimisation of this Opportunity Area site for a mixed-use development with affordable workspace is supported in principle, subject to the affordable housing and workspace uses being appropriately secured, and a Bakerloo Line Extension phasing obligation (where required).

**Housing** - The proposal delivers 79 affordable housing units (36% by NIA floorspace), with a tenure split of 67% social rent /33% shared ownership. An Early-Stage Viability Review mechanism should be secured.

**Urban design -** Officers welcome the optimisation of the site through a design-led approach. The layout, scale, massing and detailed design of the proposal is generally supported. The northern and southern elevation 'gable end' would benefit from further refinement to achieve further articulation. The principle of tall buildings complies with the locational requirements of Policy D9(B) and is acceptable in strategic planning terms, subject to appropriately addressing impacts.

**Transport –** Generally no significant concerns but further information on cycle storage, car parking and servicing. Contributions should be sought towards bus improvements and cycle hire scheme.

**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 applicants have subsequently revised their affordable housing offer to weight the delivery more towards social rented tenure, in order to increase the equivalent amount of floorspace so that it would hit 40% NIA. The relevant design and transport conditions would be secured on any consent issued and the applicant has provided clarification to the GLA on transport, sustainability and the design refined to take into account the comments raised.

## Health and Safety Executive

389. 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

390. No response.

## Historic England

391. No response.

## Arqiva

392. No response.

## London Fire Brigade

393. No response.

## London Underground

394. No objection.
**Response** – Noted.

## Metropolitan Police

395. 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.

## National Air Traffic Services (NATS)

396. No safeguarding objections.
**Response** – Noted.

## Thames Water

397. No objection subject to conditions.
**Response** – Noted, the relevant condition would be attached to any consent issued.

## London Borough of Lewisham

398. No response received.

## Network Rail

399. No response received.

## Transport for London (TfL)

400. **Public Transport** - The application is supported by a full Healthy Streets Transport Assessment. Until the BLE is delivered, buses will be the main mode of transport. Currently the site is only served by the P12 bus route but there are plans, subject to necessary funding and other approvals, to provide a new route/s to support growth in this part of the OKROA. However, the existing network is already at or close to capacity and cannot cater for the additional peak time demand. Therefore, if this development is permitted, officers would expect a tariff of £2,700 per home (or equivalent) indexed by the Building Cost Information Service (BCIS) from 2019 to be secured within the S106, to be used towards bus service improvements in line with the agreement with the Council, and as committed by all other developers and included in the extant consent.

401. **Car Parking** - Six disabled persons' car parking spaces have been proposed, which does not meet the three per cent requirement in Policy T6. Improvements to active travel links and bus stops within the vicinity are required for this to be deemed acceptable, along with exploration of re-housing students requiring blue badge spaces nearer their universities.

A Parking Design and Management Plan should be secured demonstrating compliance with Policy T6.1.

All proposed spaces should be electric vehicle charging point enabled to align with London Plan policy. Currently, no spaces have active or passive provision which is not supported.

402. **Servicing and deliveries –** Deliveries and Servicing are proposed in an on-street loading bay, which does not align Policy T7. A full Delivery and Servicing Plan should be secured by condition to align with Policy T7.
A full Construction Logistics Plan should be secured by condition to align with Policy T7. Deliveries should occur off-street; use of sustainable transport should be explored; and safe movement of pedestrians and cyclists maintained throughout the construction period.
A full Travel Plan should be secured through condition, including measures to encourage active and sustainable travel as per Strategic Mode Shift in Policy Funding for the implementation and monitoring of the Travel Plan should be secured in the S106.
A student move in/out management plan should be secured through condition. Officers have concerns about the reliance on disabled persons' parking bays during move in/out. Further thought on this is required.

403. **Cycle parking** - Cycle parking does not yet meet the minimum standards in Policy T5, including the London Cycling Design Standards. Furthermore, short-stay cycle parking is proposed on public highway on Ilderton Road which is also contrary to Policy T5.

404. **Officer Response –** These comments are noted with the contributions and conditions secured as part of the recommendation. Further discussions have been held in relation to the servicing, and clarification and updates provided in relation to cycle storage and parking.

## Old Kent Road Community Review Panel

405. It should be noted that the Community Review Panel took place prior to the planning application being submitted in July 2024. As such, the comments from the Panel, as summarised below, are a reflection on the proposal at a less developed stage than the planning application. The below summaries the response received from the panel:

Design, Scale and massing

- The panel supports the way the massing has been broken up, moderating the visual impact of the tall building.
- The neighbouring terrace of houses is much smaller in scale than the

development, and every effort should be made to minimise the impact of the scheme on them.
- The architectural expression is not yet fully resolved, and it encourages careful thought about how materials and colour are used.

Community and non-residential uses
- The space doubling up as both café and community space is welcomed.
- A pharmacy is also proposed, and the panel asks if this is what's most needed in the area, other options could be explored.
- A community garden is welcomed.
- Management of the café / community space and other shared areas will be crucial to their success, as would the affordability of the use of these spaces.

Industrial space
- The panel is pleased that some industrial space is being provided as part of the development. Could more be provided? Affordability and flexibility of the spaces will be important.

Student accommodation
- The diversity of student rooms is welcomed, suiting different budgets and lifestyles.

Residential layout
- Ilderton Road is heavily trafficked and there is a train line on the other side of the site. Sound proofing will be essential, and the panel suggests family units should be located in the least noisy areas of the site.
- Balcony layouts with access from both living and bedrooms are positive.

Landscape
- Retention of existing trees along Surrey Canal Road is welcomed.
- A podium garden, roof terraces, and a small ground level community garden are shown in the landscape plan. More information on these spaces would be valuable as design work progresses, for example to clarify planting, seating, and how much sunlight each will receive.
- The panel would also like more detail on public realm improvements that will be delivered as part of the scheme.
-

Officers responses:
The panels views are welcomed by officers, and the designs have evolved significantly since being presented to the CRP, with additional detail provided to the architecture, landscape and public realm elements to respond to some of the queries raised by the panel. Residential layouts have also been further worked up with the majority of family units facing onto the proposed roof top terrace which is supported. Overall, the proposals have responded positively to the comments raised by the panel and officers overall support the proposals.

## Consultation responses from internal consultees

Highways

406. 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.

Environmental Protection Team

407. 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

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

409. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.

410. 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.

411. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership. This scheme would provide new accessible affordable housing which would benefit groups with protected characteristics particularly BAME groups who are disproportionately effected by a lack of access to affordable homes. The public realm improvements would better accessibility for those with mobility and other impairments. The affordable workspace would provide opportunities for local small business users which may also benefit BAME groups. It is not considered that the development would create and harms to those with protected characteristics.

## Human rights implications

412. 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.

413. This application has the legitimate aim of delivering a comprehensive development comprising large-scale purpose-built student accommodation units, affordable housing, affordable workspace, light industrial uses, public realm improvements, landscaping and other associated works. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

## Positive and proactive statement

414. 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.

415. 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.

## 416. 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

417. This application would bring into productive and optimised re-use this underutilised site, providing a complementary mixture of affordable housing, students homes, light industrial unit, a community café and flexible retail space contributing to the creation of a mixed and inclusive community. These uses would be supported by high quality hard- and soft-landscaped new public realm along Ilderton Road with a new community garden adjacent to Surrey Canal Road.

418. All residential units have access to large private amenity spaces in the form of balconies or winter gardens. The scheme also benefits from two communal outdoor amenity spaces which meets all requirements for communal and children's playspace on site, with the communal amenity spaces being accessible to all residents within the development.

419. The quality of the proposed residential accommodation is considered to be of a high quality, meeting or exceeding the minimum space standards and providing 58% dual aspect accommodation. The proposal also provides a range of housing choices from one-bed one-person to three-bedroom properties, including, 81% two-bed plus homes, 25.31% three-bed family homes and 10% wheelchair housing by habitable room.

420. In terms of the environmental benefits of the proposed development, it would achieve 68% on-site carbon emissions, with the deficit being captured by way of a financial contribution. In addition, the proposal would result in no loss of trees, with four additional street trees being proposed, alongside 45 additional trees at roof level resulting in a significant urban greening of the site, meeting the GLA 0.4 requirements for Urban Greening.

421. The proposed development would reduce car dependency whilst significantly increasing cycle provision within the development. The increased width of the public footway along both frontages is anticipated to significantly enhance the public realm and improve the pedestrian experience through comfort and circulation when entering, visiting or moving past the site.

422. The impacts of the scheme on neighbouring properties in relation to daylight and sunlight would not result in significant detrimental harm to the living conditions of neighbouring occupiers. Whilst there would be some instances where the results would not satisfy the BRE Guidelines, the retained levels would be within the range considered acceptable for an urban location.

423. The proposed development would be of a high quality of architecture and is considered to enhance the existing appearance of the subject site whilst

referencing the surrounding context. The design has ensured that there would be depth and articulation to facades of the development.

424. The proposal would also enable major new transport infrastructure upgrades, enhancing links with the surrounding areas by providing safe and accessible walking, cycling and public transport routes. This would support the aspirations of the Old Kent Road Opportunity Area as set out in the adopted site allocation (NSP70) and the draft site allocation (OKR16).

425. 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<br>160 Tooley Street<br>London<br>SE1 2QH | Planning enquiries telephone:<br>020 7525 5403<br>Planning enquiries email:<br>planning.enquiries@southwark.gov.uk<br>Case officer telephone:<br>0207 525 0254<br>Council website:<br>www.southwark.gov.uk |

## APPENDICES

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

## AUDIT TRAIL

| | |
|---|---|
| **Lead Officer** | Stephen Platts, Director of Planning and Growth |
| **Report Author** | Alex Cameron, Team Leader |
| **Version** | Final |
| **Dated** | 20 June 2025 |
| **Key Decision** | No |

| **CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER** | | |
|---|---|---|
| **Officer Title** | **Comments Sought** | **Comments included** |
| Strategic Director of Resources | No | No |
| Strategic Director Environment of Sustainability & Leisure | No | No |
| Strategic Director of Housing | No | No |
| **Date final report sent to Constitutional Team** | | 20 June 2025 |

**Appendix 1**

# Recommendation (draft decision notice)

| | | | |
|---|---|---|---|
| **Applicant** | Fifth Rose Ilderton Limited | **Reg. Number** | 24/AP/3575 |
| **Application Type** | Major application | | |
| **Recommendation** | GRANT subject to Legal Agreement (GLA) | **Case Number** | PP-13527370 |

## Draft of Decision Notice

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

Demolition of the existing buildings on the site and the construction of a linked building with a tower housing purpose built student accommodation (Use Class Sui Generis), a shoulder element housing affordable residential housing (Class C3) both with basement level, and an industrial building including affordable workspace at the southern element of the Site (Classes B2, B8, E(g)(iii), and Sui Generis), alongside the delivery of a flexible Class E unit at ground floor level, and a mixed community cafe and PBSA co-working space (Class E/Sui Generis) at ground floor level on the corner of Ilderton Road and Surrey Canal Road, in addition to the delivery of hard and soft landscaping, pedestrian and vehicle access including the provision of a loading bay on Ilderton Road, cycle parking, blue badge car parking, wider public realm improvements including new public open space, with associated highway works and all other ancillary works associated with the development.

For information:

- The student housing tower element would be a part 23 and part 27 storey (max 89.5m AOD height), plus basement, element containing 477 purpose-built student accommodation rooms (Use Class Sui Generis), alongside communal student amenity space, student co-working space and associated ancillary spaces.

- The affordable housing block would be a part 10, part 13 storey (max 51.7m AOD height) shoulder element, plus basement, containing 79 affordable homes (Class C3), comprising 58 social rented homes and 21 shared ownership intermediate homes. The ground floor would contain a 98.4sqm flexible e-class use, entrance lobby, bin stores and 6 Blue Badge parking spaces, together with associated amenity and ancillary spaces.

- The industrial buildings proposed would consist of a part 1, part 2 and part 4 building (max 18.4m AOD height), containing 1,747sqm of industrial floorspace, including affordable workspace at the southern element of the Site (Classes B2, B8, E(g)(iii), and Sui Generis.

Ilderton Wharf 1 - 7 Rollins Street London Southwark

**In accordance with application received on** 5 December 2024 **and Applicant's Drawing Nos.**:

Existing Plans

Proposed Plans

Other Documents

received

**Time limit for implementing this permission and the approved plans**

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

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

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

3. a) Prior to the commencement of development works, an intrusive site investigation and associated risk assessment shall be completed to fully characterise the nature and extent of any contamination of soils and ground water on the site.

b) In the event that contamination is found that presents a risk to future users or controlled waters or other receptors, a detailed remediation and/or

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

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

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

Reason

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off-site receptors in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P64 (Contaminated land and hazardous substances), and the National Planning Policy Framework 2024.

4. No development approved by this planning permission shall commence until a strategy to deal with the potential risks associated with any contamination of the site has been submitted to, and approved in writing by, the Local Planning Authority. This strategy will include the following components:
1. A preliminary risk assessment which has identified:

- all previous uses;

- potential contaminants associated with those uses;

- a conceptual model of the site indicating sources, pathways and receptors;

- and potentially unacceptable risks arising from contamination at the site.

2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.

3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the written consent of the local planning authority. The scheme shall be implemented as approved.

Reason

To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P64 (Contaminated land and hazardous substances) and the National Planning Policy Framework (NPPF) 2024.

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

Reason: In order that the applicants supply the necessary archaeological information to ensure suitable mitigation measures and/or foundation design proposals be presented in accordance with Policy P23 Archaeology of the Southwark Plan (2022) and the National Planning Policy Framework 2024.

6. Before any work hereby authorised begins, [excluding archaeological evaluation, demolition to slab level, and site investigation works] the applicant shall secure the implementation of a programme of archaeological mitigation

works in accordance with a written scheme of investigation, which shall be submitted to and approved in writing by the Local Planning Authority.

Reason: In order that the details of the programme of works for the archaeological mitigation are suitable with regard to the impacts of the proposed development and the nature and extent of archaeological remains on site in accordance with Policy P23 Archaeology of the Southwark Plan (2022) and the National Planning Policy Framework 2024.

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

Reason: In order that all below ground impacts of the proposed development are known and an appropriate protection and mitigation strategy is achieved to preserve archaeological remains by record and/or in situ in accordance with Policy P23 Archaeology of the Southwark Plan (2022) and the National Planning Policy Framework 2024.

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

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

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

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

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

o A commitment to adopt and implement of the ICE Demolition Protocol and Considerate Contractor Scheme; Site traffic - Routing of in-bound and

outbound site traffic, one-way site traffic arrangements on site, location of lay off areas, etc.;

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

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

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

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

o Section 61 of Control of Pollution Act 1974,

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

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

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

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

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

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

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

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

Reason

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

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

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

a) Purpose Built Student Accommodation

b) Affordable residential Accommodation

c) Self Storage and light industrial units

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

The development shall not be carried out otherwise than in accordance Construction Logistics Plan or any amendments thereto.

Reason: To ensure that construction works do not have an adverse impact on the transport network and to minimise the impact of construction activities on local air quality, in accordance with the National Planning Policy Framework (2024); T1 (Strategic approach to transport), Policy T4 (Assessing and mitigating transport impacts), Policy T7 (Deliveries, servicing and construction), Policy SI 1 (Improving air quality) of the London Plan (2021); Policy P56 (Protection of amenity) of the Southwark Plan (2022).

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

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

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

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

- how the wheelchair accessible parking spaces are to be allocated on the basis of need (reflecting the fact that not every owner and/or occupier of a wheelchair dwelling may own a vehicle and not every disabled driver will require a wheelchair dwelling); and

- how, in the event that there is demand from the residential occupiers of the development, additional wheelchair accessible parking spaces to serve the wheelchair accessible residential units could be provided (including timeframe commitments for delivery such additional spaces).

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

Reason:

To ensure that there would be adequate provision for wheelchair accessible parking spaces, and that a strategy is in place to deliver more parking spaces in the event that there is occupier demand, in accordance with: the National Planning Policy Framework 2024; Policy T6.1 (Residential parking) of the London Plan 2021; and Policy P55 (Parking standards for disabled people and the physically impaired) of the Southwark Plan 2022.

11. Details of native planting as part of the landscape strategy/plan shall be submitted to and approved in writing by the Local Planning Authority prior to any superstructure works commencing on site.

Ideally the landscape planting should contain a minimum of 60% of plants on the RHS perfect for Pollinators list.

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with the National Planning Policy Framework (2024); Policy: G5 (Urban greening) and G6 (Biodiversity and access to nature); of the London Plan (2021); Policy P59 (Green infrastructure) and Policy P60 (Biodiversity) of the Southwark Plan (2022).

12. Before any above grade work hereby authorised begins, detailed drawings of a hard and soft landscaping scheme showing the treatment of all parts of the site not covered by buildings shall be submitted to and approved in writing by the Local Planning Authority. The site shall be landscaped strictly in accordance with the approved details in the first planting season after completion of the development. Details shall include:

1) a scaled plan showing all existing vegetation and landscape features to be retained with proposed trees, hedging, perennial and other plants;

2) proposed parking, access, or pathway layouts, materials and edge details;

3) location, type and materials to be used for hard landscaping including specifications, where applicable for:

a) permeable paving

b) tree pit design

c) underground modular systems

d) sustainable urban drainage integration

e) use within tree Root Protection Areas (RPAs);

4) typical cross sections;

5) a schedule detailing sizes and numbers/densities of all proposed trees/plants;

6) specifications for operations associated with plant establishment and maintenance that are compliant with best practise; and

7) types and dimensions of all boundary treatments.

There shall be no excavation or raising or lowering of levels within the prescribed root protection area of retained trees unless agreed in writing by the Local Planning Authority.

The landscaping shall not be carried out otherwise than in accordance with any such approval given and shall be retained for the duration of the use. Any trees, shrubs, grass or other planting that is found to be dead, dying, severely damaged or diseased within five years of the completion of the building works OR five years of the carrying out of the landscaping scheme (whichever is later), shall be replaced in the next planting season by specimens of the equivalent stem girth and species in the first suitable planting season.

Unless required by a separate landscape management condition, all soft landscaping shall have a written five-year maintenance programme following planting.

Works shall comply to BS: 4428 Code of practice for general landscaping operations, BS: 5837 (2012) Trees in relation to demolition, design and construction; BS3998: (2010) Tree work - recommendations, BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf); EAS 03:2022 (EN) - Tree Planting Standard.

Reason:

So that the Council may be satisfied with the details of the landscaping scheme, in accordance with: Chapters 8, 12, 15 and 16 of the National Planning Policy Framework 2021; Policies SI 4 (Managing heat risk), SI 13 (Sustainable drainage), G1 (Green Infrastructure, G5 (Urban Greening) and G7 (Trees and Woodlands) of the London Plan 2021; Policy P13 (Design of Places), Policy P14 (Design Quality), Policy P56 (Protection of Amenity), Policy P57 (Open Space), Policy P60 (Biodiversity) and P61 (Trees) of the Southwark Plan (2022).

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

1. Intensive green roof or vegetation over structure. Substrate minimum settled depth of 150mm Or, extensive green roof with substrate of minimum settled depth of 80mm (or 60mm beneath vegetation blanket) - meets the requirements of GRO Code 2014;

2. laid out in accordance with roof plans hereby approved; and.

3. planted/seeded with an agreed mix of species within the first planting season following the practical completion of the building works (focused on minimum 75% wildflower planting, and no more than a maximum of 25% sedum coverage).

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

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

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

Reasons:

a) To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with the National Planning Policy Framework 2024; policies: G1, G5, G6, and SI 13 of the London Plan 2021, Policy P59 and P60 of the Southwark Plan 2022.

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

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

No less than two bat tubes, bricks or boxes shall be provided and the details shall include the exact location, specification and design of the habitats.

(ii) Full details of the roost features and mapped locations to meet the requirements of (i) shall be submitted to and approved in writing by the Local Planning Authority

(iii) Evidence shall be submitted in writing to the Local Planning Authority to show that the roost features have been installed in full in accordance with part (ii)

(iiii) The bat tubes, bricks or boxes shall be installed with the development prior to the first occupation of the building to which they form part or the first use of the space in which they are contained and maintained in perpetuity

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with the National Planning Policy Framework (2024); Policy G1 (Green Infrastructure), Policy G5 (Urban Greening), Policy G6 (Biodiversity and access to nature) of the London Plan (2021); Policy P59 (Green infrastructure) and Policy P60 (Biodiversity) of the Southwark Plan (2022).

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

No less than three Swift nesting bricks shall be provided and the details shall include the exact location, specification and design of the bricks.

(ii) Full details of the nesting features and mapped locations to meet the requirements of (i) shall be submitted to and approved in writing by the Local Planning Authority

(iii) Evidence shall be submitted in writing to the Local Plannng Authority to show that the nesting features have been installed in full in accordance with part (ii)

(iiii) The nesting features 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 and maintained in perpetuity

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with National Planning Policy Framework (2024); Policy G1 (Green Infrastructure), Policy G5 (Urban Greening), Policy G6 (Biodiversity and access to nature) of the London Plan (2021); Policy P59 (Green infrastructure) and Policy P60 (Biodiversity) of the Southwark Plan (2022).

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

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

b) unless otherwise agreed in writing by the Local Planning Authority, full scale mock-ups of the facades shall be presented on site (or near to the site) for each building and approved in writing by the Local Planning Authority (the detailed scope of mock up requirements to have been agreed with the Local Planning Authority in advance of them being constructed and presented on site).

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

Reason:

In order that the Local Planning Authority may be satisfied that these samples will make an acceptable contextual response in material terms, will achieve a high quality of design and detailing, and are consistent with the consented scheme, in accordance with: the National Planning Policy Framework 2024; Policy D4 (Delivering Good Design) of the London Plan 2021; and Policies P13 (Design of Places) and P14 (Design Quality) of the Southwark Plan 2022.

17. Before any above grade work hereby consented begins (with the exception

of demolition and site clearance), section detail-drawings at a scale of 1:5 together with 1:50 scale context drawings through:

i. Facades (reveals etc.) including:

- The various brick treatments;

- Canopies/awnings;

- Junctions of exposed structural elements (columns, beams and floors);

- Head, cills and jambs of openings;

- Parapets and roof edges;

- Rooftop balustrades;

ii. Entrances (including any access sashes, security gates, entrance portals and awnings);

iii. Typical windows;

iv. Plant screening/ enclosure;

v. Shopfront of the commercial units and the Large-scale Purpose-built

Student accomondation and affordable housing foyers;

vi. Signage zones; and

vii. Gates and fencing to all external spaces of the proposal to be constructed in the carrying out of this permission;

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

Reason

In order to satisfy the Local Planning Authority that the construction details

will achieve a high quality of design and detailing, are suitable in context and

are consistent with the consented scheme, in accordance with: the National

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Planning Policy Framework 2024; Policy D4 (Delivering Good Design) of the London Plan 2021; and Policies P13 (Design of Places) and P14 (Design Quality) of the Southwark Plan 2022.

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

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

Reason: In pursuance of the Local Planning Authority's duty under Section 17 of the Crime and Disorder Act (1998) to consider crime and disorder implications in exercising its planning functions and to improve community safety and crime prevention, in accordance with the National Planning Policy Framework (2023); Policy D11 (Safety Security and Resilience to Emergency) of the London Plan (2021); and Policy P16 (Designing out Crime) of the Southwark Plan (2022).

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

19. The Rated sound level from any plant, together with any associated ducting, shall not exceed the Background sound level (LA90 15min) at the nearest noise sensitive premises. Furthermore, the Specific plant sound level shall be 10dB(A) or more below the background sound level in this location. For the purposes of this condition the Background, Rating and Specific Sound levels

shall be calculated fully in accordance with the methodology of BS4142:2014+A1:2019.

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

Reason

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance or the local environment from noise creep due to plant and machinery in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2024.

20. Party walls, floors and ceilings between the non-residential or shared areas of the building (including the Class E use, car park/servicing area, PBSA amenity areas) and residential dwellings shall be designed to achieve a minimum weighted standardized level difference of 55dB DnTw+Ctr. Pre-occupation testing of the separating partition shall be undertaken for airborne sound insulation in accordance with the methodology of ISO 16283-1:2014. Details of the specification of the partition together with full results of the sound transmission testing shall be submitted to the Local Planning Authority for written approval prior to the use commencing and once approved the partition shall be permanently maintained thereafter.

Reason

To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of noise nuisance and other excess noise from activities within the commercial premises in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2024.

21. Prior to occupation, building envelope sound insulation of any commercial use shall be so adapted as necessary in light of the intended commercial use in order to provide reasonable resistance to the transmission of sound sufficient to ensure that noise due to the commercial premises does not exceed NR40 when measured as an LAeq across any 5 minute period at any location 3m from the commercial facade.

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 Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2024.

22. Prior to any part of the permitted development being occupied a verification report demonstrating the completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to, and approved in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

Reason

To ensure that the site does not pose any further risk to human health or the water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete, in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P64 (Contaminated land and hazardous substances) and the National Planning Policy Framework (NPPF) 2024.

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

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

Living and Dining rooms- 35dB LAeq T †

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

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

A report shall be submitted in writing to and approved by the LPA detailing acoustic predictions and mitigation measures to ensure the above standards are met. Following completion of the development and prior to occupation, a validation test shall be carried out on a relevant sample of premises. The results shall be submitted to the LPA for approval in writing. The approved scheme shall be implemented and permanently maintained thereafter.

Reason

To ensure that the occupiers and users of the development do not suffer a loss of amenity by reason of excess noise from environmental and transportation in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2024.

24. Prior to first occupation of the development hereby permitted a Delivery and Service Management Plan detailing how all elements of the site are to be serviced shall be submitted to and approved by the Local Planning Authority. The servicing of the development shall be carried out in accordance with the approval given and the Service Management Plan shall remain extant for as long as the development is occupied.

Reason: To ensure compliance with the National Planning Policy Framework (2024); Policy P49 (Public transport); Policy P50 (Highways impacts); Policy P51 (Walking) of the Southwark Plan (2022).

25. Prior to the occupation of the development, hereby approved, a student accommodation management plan shall be submitted to, and approved in writing by, the local planning authority. Details should include:

-Safety and crime prevention

-Management and maintenance of the site (including all amenity spaces)

- Move in/move out strategy

-Code of conduct (including details on student welfare, and landlord tenant relationship)

-Student behaviour (including how noise nuisance will be addressed)

-Emergency plans

-Service providers

-Security (including lost keys)

The management of the student accommodation shall be carried out in accordance with the approval given and the Student Management Plan shall remain extant for as long as the development is occupied.

Reason: To ensure compliance with the National Planning Policy Framework 2024; Policy P14 (Design Quality), and Policy P56 (Protection of Amenity) of the Southwark Plan (2022).

26. Prior to occupation, a lighting design strategy for biodiversity shall be submitted to and approved in writing by the local planning authority. The strategy shall:

a) identify those areas/features that are particularly sensitive for bats and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging;

and

b) show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their

territory or having access to their breeding sites and resting places.

All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority. Prior to the new development being first brought into use/occupied a bat friendly Lighting Plan shall be submitted to and approved by the Local Planning Authority.

Reason: To ensure compliance with the Habitats Regulations and the Wildlife & Countryside Act (1981), (as amended), the National Planning Policy Framework (2024); Policy G1 (Green Infrastructure), Policy G5 (Urban Greening), Policy G6 (Biodiversity and access to nature) of the London Plan (2021); Policy P59 (Green infrastructure) and Policy P60 (Biodiversity) of the Southwark Plan (2022)

27. a) The noise control scheme (including sound insulation and isolation measures) implemented in order to minimise as far as practicable both airborne noise and structure-borne noise from the use of the health and fitness studios/gym, shall ensure that the airborne and impact noise target levels detailed in Table 1 below are achieved when tested in accordance with Method 2 (ANC ProPG: Gym Acoustics Guidance (GAG) March 2023).

Airborne noise health and fitness activity noise shall be no greater than curve G15 as an Leq,5minutes, in accordance with ProPG:GAG2023 methodology in any structurally adjoining habitable areas of residential properties located above or adjoining the health and fitness studio or Gym.

Impact noise (airborne & structure-borne) health and fitness activity noise shall be no greater than G20 LMax, in accordance with ProPG:GAG2023 methodology in any structurally adjoining habitable areas of residential properties located above or adjoining the health and fitness studio or Gym.

b) Following completion of the development but prior to first occupation, validation testing shall be completed to assess that the noise scheme of works has been successfully implemented to the design expectations. A compliance report shall be submitted to and approved by the LPA. Once approved the scheme of noise control shall be permanently maintained thereafter

Reason:

To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of noise nuisance and other excess noise from activities within the fitness studios/gyms in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2024.

28. Prior to the commencement of any use involving commercial cooking of food, full particulars and details of a scheme for the extraction and ventilation of the commercial kitchen shall be submitted to and approved by the Local Planning Authority. The scheme shall include:

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

To ensure that fumes and odours from the kitchen to do affect public health or residential amenity. Once approved the scheme shall be implemented in full and permanently maintained thereafter.

Reason

In order to ensure that that any installed ventilation, ducting and ancillary equipment in the interests of amenity will not cause amenity impacts such as odour, fume or noise nuisance and will not detract from the appearance of the building in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P65 (Improving air quality), and the National Planning Policy Framework 2021.

29. Prior to the occupation 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 compliance with the National Planning Policy Framework (2024); Policy SI 2 (Minimising Greenhouse Gas Emissions) of the London Plan (2021) and Policy P70 (Energy) of the Southwark Plan (2022).

30. 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 Post Construction Monitoring Report shall be submitted to the GLA, currently via email at: circulareconomystatements@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.

Reason: In the interests of sustainable waste management and in order to maximise the re-use of materials in accordance with Policy P62 (Reducing waste) of the Southwark Plan (2022).

31. Before the first occupation of the development hereby approved, the cycle facilities (including cycle storage, showers, changing rooms and lockers where appropriate) as shown on the drawings hereby approved; shall be provided and made available to the users of the development. Thereafter, such facilities shall be retained and maintained in perpetuity.

Reason: To ensure that satisfactory safe and secure bicycle parking is provided and retained for the benefit of the users and occupiers of the building in order to encourage the use of alternative means of transport and to reduce reliance on the use of the private car in accordance with the National Planning Policy Framework (2024); Policy T5 (Cycling) of the London Plan (2021); and Policy P53 (Cycling) of the Southwark Plan (2022).

32.

a) Before the first occupation of any part of the development hereby consented, an interim report/letter (together with any supporting evidence) from the licensed BREEAM assessor shall be submitted to and approved in writing by the Local Planning Authority. The report/letter shall confirm that sufficient progress has been made in terms of detailed design, procurement and construction to be reasonably well assured that the commercial elements of the development hereby approved will, once completed, achieve the agreed 'Excellent' BREEAM Standards.

b) Within nine months of first occupation of the development hereby permitted, a certified Post Construction Review (or other verification process agreed with the Local Planning Authority) shall be submitted to and approved in writing by the Local Planning Authority, confirming that the agreed 'Excellent' BREEAM standards have been met.

Reason.

To ensure the proposal achieves high environmental standards and plays its role in reducing the extent of man-made climate change, in accordance with: the National Planning Policy Framework 2024; Policy SI2 (Minimising Greenhouse Gas Emissions) of the London Plan 2021; and Policies SP6 (Climate Emergency) and P69 (Sustainability Standards) of the Southwark Plan 2022.

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

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

Reason: To ensure that the refuse will be appropriately stored within the site thereby protecting the amenity of the site and the area in general from litter, odour and potential vermin/pest nuisance in accordance with the National Planning Policy Framework (2024) and Policy P56 (Protection of amenity) and P62 (Reducing waste) of the Southwark Plan (2022).

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

34. Any external lighting system installed at the development shall comply with Institute of Lighting Professionals Guidance Note 01/21 'Guidance notes for the reduction of obtrusive light'.

Reason

In order that the Council may be satisfied as to the details of the development in the interest of the visual amenity of the area, the amenity and privacy of adjoining occupiers, and their protection from light nuisance, in accordance with the Southwark Plan 2022 Policy P16 (Designing out crime); Policy P56 (Protection of amenity), and the National Planning Policy Framework 2024.

35. The use hereby permitted for use-class sui generis, E, B2 or B8 shall not be carried on outside of the hours 07:00 to 23:00 on any day.

Reason

To safeguard the amenity of neighbouring residential properties in accordance with Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2024.

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

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

Reason

To ensure that the users of the proposed development do not suffer a loss of amenity by reason of excess environmental noise in accordance with strategic policy 13 'High environmental standards' of the Core Strategy (2011), saved Policy 3.2 Protection of Amenity of the Southwark Plan (2007) and the National Planning Policy Framework 2024.

37. All deliveries or collections to the development hereby approved shall only be between the following hours:

- 06:30 to 22:00 Monday to Saturday; and

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

Reason

To ensure that the occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance, and to reduce vehicle movements on the local road network during peak times, in accordance with: the National Planning Policy Framework 2024; Policy T7 (Deliveries, Servicing and Construction) of the London Plan 2021; and Policy P50 (Highways Impacts) of the Southwark Plan 2022.

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

38. No infiltration of surface water drainage into the ground is permitted other than with the written consent of the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason

To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P64 (Contaminated land and hazardous substances) and the National Planning Policy Framework (NPPF) 2024.

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

Reason

To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P64 (Contaminated land and hazardous substances) and the National Planning Policy Framework (NPPF) 2024.

40. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.

Reason

To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P64 (Contaminated land and hazardous substances) and the National Planning Policy Framework (NPPF) 2024.

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

Reason: In order that the archaeological interest of the site is secured with regard to the details of the post-excavation works, publication and archiving to ensure the preservation of archaeological remains by record in accordance with Policy P23 Archaeology of the Southwark Plan (2022) and the National Planning Policy Framework 2024.

**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.

2 Piling can result in risks to groundwater quality by mobilising contamination when boring through different bedrock layers and creating preferential pathways. Thus, it should be demonstrated that any proposed piling will not result in contamination of groundwater. If Piling is proposed, a Piling Risk Assessment must be submitted, written in accordance with EA guidance document "Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention. National Groundwater & Contaminated Land Centre report NC/99/73".

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

o Duty of Care Regulations 1991
o Hazardous Waste (England and Wales) Regulations 2005
o Environmental Permitting (England and Wales) Regulations 2016
o The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standard BS EN 14899:2005 'Characterization of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays. If the total quantity of hazardous waste material produced or taken off-site is 500kg or greater in any 12-month period, the developer will need to register with us as a hazardous waste producer. Refer to the hazardous waste pages on gov.uk for more information.

4 The CLAIRE Definition of Waste: Development Industry Code of Practice (version 2) provides operators with a framework for determining whether or not excavated material arising from site during remediation and/or land development works are waste or have ceased to be waste. Under the Code of Practice:

o excavated materials that are recovered via a treatment operation can be re-used on-site providing they are treated to a standard such that they fit for purpose and

unlikely to cause pollution
- treated materials can be transferred between sites as part of a hub and cluster project formally agreed with the EA
- some naturally occurring clean material can be transferred directly between sites.

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed-on site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

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

**Appendix 2**

# 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
- Section15.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 H10 Housing size mix
- Policy H15 Purpose Built Student Accommodation
- Policy E2 Providing Suitable Business Space
- Policy E3 Affordable workspace
- Policy E4 Land for Industry, logistics and services to support London's Economic Function
- Policy E6 Locally significant Industrial sites
- Policy E7 Industrial Intensification, co-location and substitution
- Policy 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
- P1 Social rented and intermediate housing
- P2 New family homes
- P5 Student 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
- P29 – Strategic Protected Industrial Land
- P30 - Office and Business Development
- 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

21/AP/4757 – Demolition of existing buildings and erection of a mixed use development comprising a building of part 9, 23 and 25 storeys above ground to provide a replacement builders merchants with associated office, trade counter sales area , showroom and external storage/racking, a commercial unit fronting Ilderton Road (Use Class E),163 residential apartments (Use Class C3) and other associated infrastructure. Granted on 28.06.2024.

24/AP/2057 - Request for an EIA Screening Opinion for the demolition of the existing building on site to deliver three buildings linked by a podium, with the tallest of the buildings being up to 27 storeys in height. In total, the development would comprise:

- approximately 80 residential (Class C3) housing units, with 40% of the total habitable rooms to be provided in affordable tenures;
- a 477-bedspace Purpose Built Student Accommodation premises (Sui Generis);
- approximately 1,800 square metres of employment/business use (some to be Class B2/B8/Sui Generis) and 100 square metres of commercial use (Class E);
- enhanced public realm including hard and soft landscaping;
- cycle parking and provision for servicing and deliveries; and
- ancillary and related works.

Confirmed that the proposals would not result in any significant Environmental impacts and as such an EIA was not required.

**Appendix 4**

# Consultation undertaken

**Site notice date:** 18/12/2024
**Press notice date:** 19/12/2024
**Case officer site visit date:** n/a
**Neighbour consultation letters sent**: 17/12/2024

## Internal services consulted

Bonamy And Bramcote Estate TRA
LBS Community Infrastructure Team
LBS Transport Policy Team
LBS Environmental Protection Team
LBS Transport Policy Team
LBS Archaeologist
LBS Design And Conservation Team [Formal Consultation]
LBS Local Economy
LBS Ecology Officer
LBS Highways Development & Management
Flood Risk Management & Urban Drainage Team
LBS Urban Forester
LBS Waste Management Team
LBS Planning Policy [Formal Consultation] - General

## Statutory and non-statutory organisations

Port Of London Authority
Civil Aviation Authority
LB Lewisham
UK Power Networks
NHS London Healthy Urban Development Unit
National Air Traffic Safeguarding Office
Vital OKR
HSE Fire Risk Assessments
Fire And Emergency Department
Natural England - London Region & South East Region

Environment Agency
Greater London Authority
London Fire & Emergency Planning Authority
London Underground
Natural England - London Region & South East Region
Network Rail
Metropolitan Police Service (Designing Out Crime)
Transport For London
Transport For London
Thames Water

**Neighbour and local groups consulted:**

Flat 202 Milli House 171 - 177 Ilderton Road
Flat 19 Shirley Chisholm Court 62 Hatcham Road
Flat 16 Shirley Chisholm Court 62 Hatcham Road
Flat 12 Shirley Chisholm Court 62 Hatcham Road
Flat 6 Shirley Chisholm Court 62 Hatcham Road
Flat 3 Shirley Chisholm Court 62 Hatcham Road
235 Record Street London Southwark
Flat 12 Atar House 179 Ilderton Road
Flat 8 Atar House 179 Ilderton Road
Flat 6 Atar House 179 Ilderton Road
Flat 56 Shirley Chisholm Court 140 Ilderton Road
Flat 55 Shirley Chisholm Court 140 Ilderton Road
Flat 39 Shirley Chisholm Court 140 Ilderton Road
Apartment 38 Eden House 14 Penarth Street
Apartment 35 Eden House 14 Penarth Street
Apartment 32 Eden House 14 Penarth Street
Apartment 31 Eden House 14 Penarth Street
Apartment 18 Eden House 14 Penarth Street
Apartment 8 Eden House 14 Penarth Street
Apartment 34 Argo 16 Penarth Street
Apartment 33 Argo 16 Penarth Street
Apartment 20 Argo 16 Penarth Street
Apartment 17 Argo 16 Penarth Street
Apartment 8 Argo 16 Penarth Street
Apartment 1 Argo 16 Penarth Street
Unit 22C The Penarth Centre Penarth Street
Flat 104 Milli House 171 - 177 Ilderton Road
Flat 21 Shirley Chisholm Court 62 Hatcham Road
Flat 15 Shirley Chisholm Court 62 Hatcham Road
Flat 11 Shirley Chisholm Court 62 Hatcham Road
Second Floor Flat 209 Ilderton Road London
Unit 22 The Penarth Centre Penarth Street
International Secretariat 215 Ilderton Road London
Apartment 5 90 Varcoe Road London
Studio 5 40 - 50 Hatcham Road London
First Floor Flat 209 Ilderton Road London
Unit 4 62 Hatcham Road London
Flat 1 221 Ilderton Road London
Flat 5 55 Varcoe Road London
24 Gerards Close London Southwark
148 - 150 Ilderton Road London Southwark
Studio 6 40 - 50 Hatcham Road London
Studio 4 40 - 50 Hatcham Road London
Unit 19 The Penarth Centre Penarth Street
Unit 28B The Penarth Centre Penarth Street
Corner Of Sharratt Street 257 - 283 Ilderton Road London
Unit 1 2 And 4 The Penarth Centre Penarth Street
Unit 34 The Penarth Centre Penarth Street
Ilderton Primary School Ilderton Road London
Unit 29 The Penarth Centre Penarth Street
Flat 1 213 Ilderton Road London
Unit 3 62 Hatcham Road London
Flat A 219 Ilderton Road London
Unit 14 And 15 The Penarth Centre Penarth Street
Unit 24A The Penarth Centre Penarth Street
The Waterhouse Project 3 Stockholm Road London
Flat B 219 Ilderton Road London
Flat 6 55 Varcoe Road London
Flat 3 55 Varcoe Road London
Unit 32D The Penarth Centre Penarth Street
Unit One And Two 202 Ilderton Road London

Unit 32 A To C The Penarth Centre Penarth Street
Flat 1 55 Varcoe Road London
Flat 3 211 Ilderton Road London
Christ Apostolic Church 163 Ilderton Road London
Unit 1 62 Hatcham Road London
217 Ilderton Road London Southwark
Unit 30 The Penarth Centre Penarth Street
Unit 6 202 Ilderton Road London
140 Ilderton Road London Southwark
23 Gerards Close London Southwark
22 Gerards Close London Southwark
180 Ilderton Road London Southwark
Flat 3 223 - 225 Ilderton Road London
Flat 5 223 - 225 Ilderton Road London
Flat 2 223 - 225 Ilderton Road London
Flat 1 223 - 225 Ilderton Road London
223 - 225 Ilderton Road London Southwark
Flat 6 223 - 225 Ilderton Road London
Flat 4 223 - 225 Ilderton Road London
Studio 1 40 - 50 Hatcham Road London
90 Varcoe Road London Southwark
21 Gerards Close London Southwark
Unit 13 The Penarth Centre Penarth Street
Unit 24 The Penarth Centre Penarth Street
Unit 2 62 Hatcham Road London
Unit 23 The Penarth Centre Penarth Street
Units 5 And 6 The Penarth Centre Penarth Street
221 Ilderton Road London Southwark
152 - 154 Ilderton Road London Southwark
Unit 9 The Penarth Centre Penarth Street
Unit 10 The Penarth Centre Penarth Street
Flat 2 213 Ilderton Road London
202 Ilderton Road London Southwark
Units 16 And 17 The Penarth Centre Penarth Street
Unit 7 The Penarth Centre Penarth Street
Unit 2 140 Ilderton Road London
Unit 1 140 Ilderton Road London
Units 18 And 33 The Penarth Centre Penarth Street
Unit 32A The Penarth Centre Penarth Street
179A Ilderton Road London Southwark
Unit 21A The Penarth Centre Penarth Street
Unit 28A The Penarth Centre Penarth Street
Unit 20 Right The Penarth Centre Penarth Street
Unit 12 The Penarth Centre Penarth Street
Unit 8 The Penarth Centre Penarth Street
Unit 3 The Penarth Centre Penarth Street
Unit 25 And 26 The Penarth Centre Penarth Street
Unit 11 The Penarth Centre Penarth Street
Apartment 4 90 Varcoe Road London
Apartment 1 90 Varcoe Road London
Apartment 6 90 Varcoe Road London
Apartment 3 90 Varcoe Road London
Flat A 217 Ilderton Road London
Flat 2 221 Ilderton Road London
Flat B 154 Ilderton Road London
Flat 2 211 Ilderton Road London
Flat 1 211 Ilderton Road London
Unit 28 The Penarth Centre Penarth Street
Flat 7 Atar House 179 Ilderton Road
Flat 86 Shirley Chisholm Court 140 Ilderton Road
Flat 84 Shirley Chisholm Court 140 Ilderton Road
Flat 76 Shirley Chisholm Court 140 Ilderton Road
Flat 75 Shirley Chisholm Court 140 Ilderton Road
Flat 73 Shirley Chisholm Court 140 Ilderton Road
Flat 69 Shirley Chisholm Court 140 Ilderton Road
Flat 62 Shirley Chisholm Court 140 Ilderton Road
Flat 60 Shirley Chisholm Court 140 Ilderton Road
Flat 44 Shirley Chisholm Court 140 Ilderton Road
Flat 34 Shirley Chisholm Court 140 Ilderton Road
Apartment 30 Eden House 14 Penarth

Street
Apartment 22 Eden House 14 Penarth Street
Apartment 15 Eden House 14 Penarth Street
Apartment 14 Eden House 14 Penarth Street
Apartment 12 Eden House 14 Penarth Street
Apartment 45 Argo 16 Penarth Street
Apartment 41 Argo 16 Penarth Street
Apartment 40 Argo 16 Penarth Street
Apartment 39 Argo 16 Penarth Street
Apartment 15 Argo 16 Penarth Street
Apartment 12 Argo 16 Penarth Street
Apartment 10 Argo 16 Penarth Street
Unit A Milli House 171 - 177 Ilderton Road
Flat 301 Milli House 171 - 177 Ilderton Road
Flat 203 Milli House 171 - 177 Ilderton Road
Flat 29 Shirley Chisholm Court 62 Hatcham Road
Flat 28 Shirley Chisholm Court 62 Hatcham Road
Flat 23 Shirley Chisholm Court 62 Hatcham Road
Flat 13 Shirley Chisholm Court 62 Hatcham Road
Flat 7 Shirley Chisholm Court 62 Hatcham Road
Studio 11 40 - 50 Hatcham Road London
Studio 7 40 - 50 Hatcham Road London
Unit A3 Atar House 179 Ilderton Road
Flat 85 Shirley Chisholm Court 140 Ilderton Road
Flat 83 Shirley Chisholm Court 140 Ilderton Road
Flat 79 Shirley Chisholm Court 140 Ilderton Road
Flat 72 Shirley Chisholm Court 140 Ilderton Road
Flat 57 Shirley Chisholm Court 140 Ilderton Road
Flat 54 Shirley Chisholm Court 140 Ilderton Road
Flat 50 Shirley Chisholm Court 140 Ilderton Road
Flat 46 Shirley Chisholm Court 140 Ilderton Road
Apartment 39 Eden House 14 Penarth Street
Apartment 28 Eden House 14 Penarth Street
Apartment 44 Argo 16 Penarth Street
Apartment 38 Argo 16 Penarth Street
Apartment 16 Argo 16 Penarth Street
Apartment 11 Argo 16 Penarth Street
Apartment 4 Argo 16 Penarth Street
Flat 201 Milli House 171 - 177 Ilderton Road
Flat 103 Milli House 171 - 177 Ilderton Road
Flat 22 Shirley Chisholm Court 62 Hatcham Road
Flat 9 Shirley Chisholm Court 62 Hatcham Road
Flat 8 Shirley Chisholm Court 62 Hatcham Road
Studio 8 40 - 50 Hatcham Road London
Studio 13 40 - 50 Hatcham Road London
Studio 3 40 - 50 Hatcham Road London
Unit 20 Left The Penarth Centre Penarth Street
236 Record Street London Southwark
Flat 10 Atar House 179 Ilderton Road
Flat 77 Shirley Chisholm Court 140 Ilderton Road
Flat 70 Shirley Chisholm Court 140 Ilderton Road
Flat 64 Shirley Chisholm Court 140 Ilderton Road
Flat 59 Shirley Chisholm Court 140 Ilderton Road
Flat 52 Shirley Chisholm Court 140 Ilderton Road
Flat 45 Shirley Chisholm Court 140 Ilderton Road
Flat 41 Shirley Chisholm Court 140 Ilderton Road
Flat 33 Shirley Chisholm Court 140 Ilderton Road
Flat 32 Shirley Chisholm Court 140 Ilderton Road
Apartment 33 Eden House 14 Penarth Street
Apartment 25 Eden House 14 Penarth Street
Apartment 20 Eden House 14 Penarth Street
Apartment 3 Eden House 14 Penarth Street
Apartment 43 Argo 16 Penarth Street

Apartment 35 Argo 16 Penarth Street
Apartment 32 Argo 16 Penarth Street
Apartment 29 Argo 16 Penarth Street
Apartment 21 Argo 16 Penarth Street
Apartment 18 Argo 16 Penarth Street
Apartment 13 Argo 16 Penarth Street
Unit 22A The Penarth Centre Penarth Street
Flat 27 Shirley Chisholm Court 62 Hatcham Road
Flat 26 Shirley Chisholm Court 62 Hatcham Road
Flat 10 Shirley Chisholm Court 62 Hatcham Road
Flat 4 Shirley Chisholm Court 62 Hatcham Road
Flat 2 Shirley Chisholm Court 62 Hatcham Road
Studio 9 40 - 50 Hatcham Road London
Unit 21B The Penarth Centre Penarth Street
Unit A1 Atar House 179 Ilderton Road
Flat 81 Shirley Chisholm Court 140 Ilderton Road
Flat 80 Shirley Chisholm Court 140 Ilderton Road
Flat 74 Shirley Chisholm Court 140 Ilderton Road
Flat 68 Shirley Chisholm Court 140 Ilderton Road
Flat 65 Shirley Chisholm Court 140 Ilderton Road
Flat 47 Shirley Chisholm Court 140 Ilderton Road
Flat 35 Shirley Chisholm Court 140 Ilderton Road
Flat 30 Shirley Chisholm Court 140 Ilderton Road
Apartment 26 Eden House 14 Penarth Street
Apartment 21 Eden House 14 Penarth Street
Apartment 42 Argo 16 Penarth Street
Apartment 36 Argo 16 Penarth Street
Apartment 9 Argo 16 Penarth Street
Apartment 6 Argo 16 Penarth Street
Apartment 2 Argo 16 Penarth Street
Flat 5 Shirley Chisholm Court 62 Hatcham Road
182 - 196 Ilderton Road London Southwark
Studio 2 40 - 50 Hatcham Road London
Flat 4 55 Varcoe Road London
Flat 82 Shirley Chisholm Court 140 Ilderton Road
Flat 61 Shirley Chisholm Court 140 Ilderton Road
Flat 49 Shirley Chisholm Court 140 Ilderton Road
Apartment 16 Eden House 14 Penarth Street
Apartment 13 Eden House 14 Penarth Street
Apartment 9 Eden House 14 Penarth Street
Apartment 6 Eden House 14 Penarth Street
Apartment 2 Eden House 14 Penarth Street
Apartment 1 Eden House 14 Penarth Street
Apartment 37 Argo 16 Penarth Street
Apartment 28 Argo 16 Penarth Street
Apartment 27 Argo 16 Penarth Street
Apartment 23 Argo 16 Penarth Street
Apartment 22 Argo 16 Penarth Street
Apartment 7 Argo 16 Penarth Street
Unit 31 The Penarth Centre Penarth Street
Flat 204 Milli House 171 - 177 Ilderton Road
Flat 25 Shirley Chisholm Court 62 Hatcham Road
Flat 24 Shirley Chisholm Court 62 Hatcham Road
Flat 17 Shirley Chisholm Court 62 Hatcham Road
Flat 14 Shirley Chisholm Court 62 Hatcham Road
Apartment 2 90 Varcoe Road London
Flat A 209 Ilderton Road London
Flat 2 55 Varcoe Road London
Unit A2 Atar House 179 Ilderton Road
Flat 11 Atar House 179 Ilderton Road
Flat 5 Atar House 179 Ilderton Road
Flat 4 Atar House 179 Ilderton Road
Flat 3 Atar House 179 Ilderton Road
Flat 67 Shirley Chisholm Court 140 Ilderton Road
Flat 58 Shirley Chisholm Court 140 Ilderton Road
Flat 51 Shirley Chisholm Court 140 Ilderton Road
Flat 48 Shirley Chisholm Court 140

Ilderton Road
Flat 37 Shirley Chisholm Court 140 Ilderton Road
Flat 31 Shirley Chisholm Court 140 Ilderton Road
Apartment 37 Eden House 14 Penarth Street
Apartment 34 Eden House 14 Penarth Street
Apartment 23 Eden House 14 Penarth Street
Apartment 5 Eden House 14 Penarth Street
Apartment 4 Eden House 14 Penarth Street
Apartment 26 Argo 16 Penarth Street
Apartment 25 Argo 16 Penarth Street
Apartment 19 Argo 16 Penarth Street
Apartment 5 Argo 16 Penarth Street
Flat 102 Milli House 171 - 177 Ilderton Road
Flat 101 Milli House 171 - 177 Ilderton Road
Flat 20 Shirley Chisholm Court 62 Hatcham Road
Flat 18 Shirley Chisholm Court 62 Hatcham Road
Flat 1 Shirley Chisholm Court 62 Hatcham Road
Studio 12 40 - 50 Hatcham Road London
Studio 10 40 - 50 Hatcham Road London
Units 1 And 2 237 Record Street London
Flat 9 Atar House 179 Ilderton Road
Flat 2 Atar House 179 Ilderton Road
Flat 1 Atar House 179 Ilderton Road
Unit 5 202 Ilderton Road London
Flat 78 Shirley Chisholm Court 140 Ilderton Road
Flat 71 Shirley Chisholm Court 140 Ilderton Road
Flat 66 Shirley Chisholm Court 140 Ilderton Road
Flat 63 Shirley Chisholm Court 140 Ilderton Road
Flat 53 Shirley Chisholm Court 140 Ilderton Road
Flat 43 Shirley Chisholm Court 140 Ilderton Road
Flat 42 Shirley Chisholm Court 140 Ilderton Road
Flat 40 Shirley Chisholm Court 140 Ilderton Road
Flat 38 Shirley Chisholm Court 140 Ilderton Road
Flat 36 Shirley Chisholm Court 140 Ilderton Road
Apartment 36 Eden House 14 Penarth Street
Apartment 29 Eden House 14 Penarth Street
Apartment 27 Eden House 14 Penarth Street
Apartment 24 Eden House 14 Penarth Street
Apartment 19 Eden House 14 Penarth Street
Apartment 17 Eden House 14 Penarth Street
Apartment 11 Eden House 14 Penarth Street
Apartment 10 Eden House 14 Penarth Street
Apartment 7 Eden House 14 Penarth Street
Apartment 31 Argo 16 Penarth Street
Apartment 30 Argo 16 Penarth Street
Apartment 24 Argo 16 Penarth Street
Apartment 14 Argo 16 Penarth Street
Apartment 3 Argo 16 Penarth Street
Unit 22B The Penarth Centre Penarth Street
Unit B Milli House 171 - 177 Ilderton Road

**Re-consultation:**

# Appendix five: Consultation responses received

## Internal services

LBS Community Infrastructure Levy Team
LBS Transport Policy
LBS Environmental Protection
LBS Transport Policy
LBS Archaeology
LBS Design & Conservation Team [Formal]
LBS Ecology
LBS Highways Development & Management
LBS Urban Forester
LBS Planning Policy

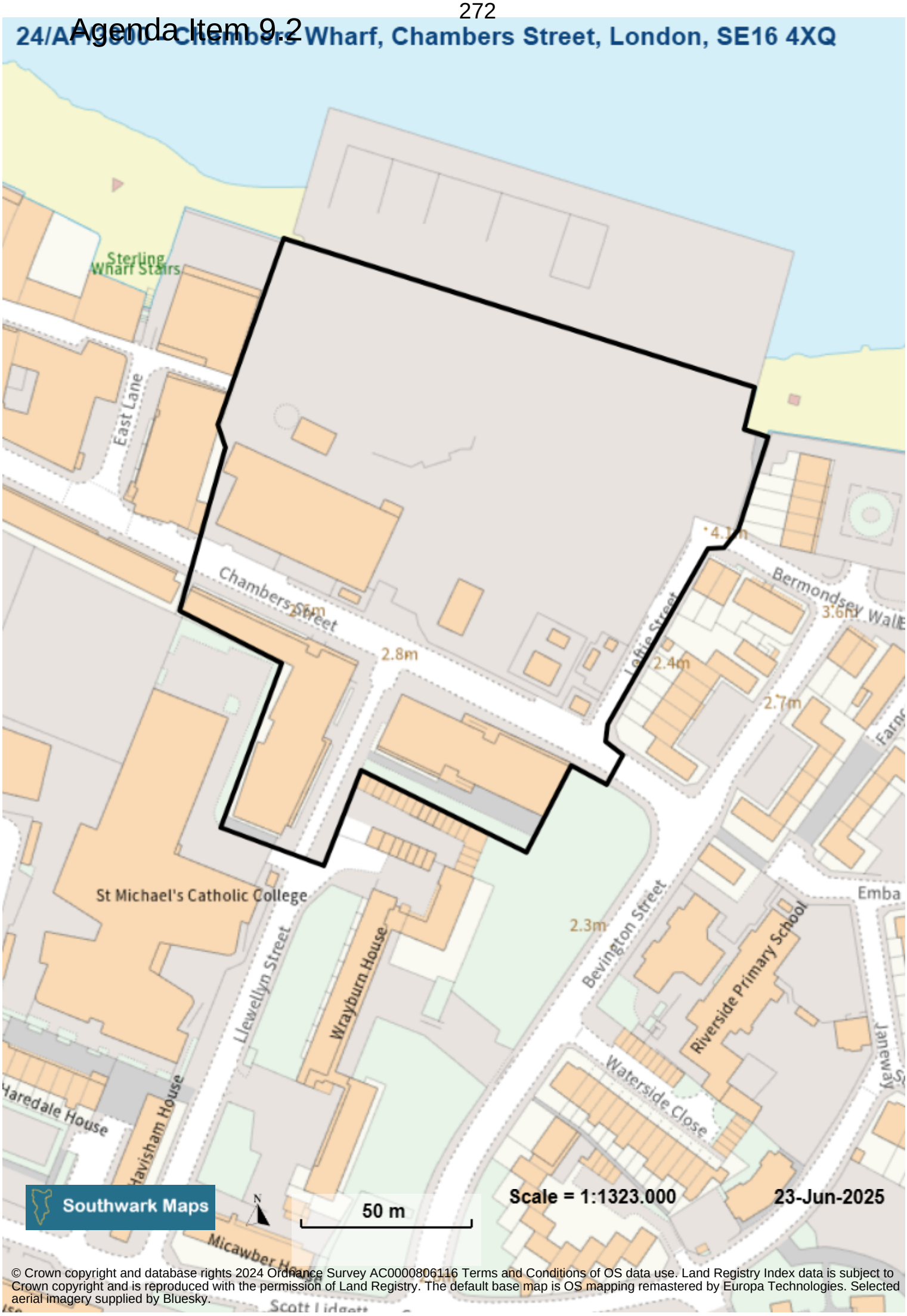
## Statutory and non-statutory organisations

Environment Agency
London Underground
Metropolitan Police Service
Thames Water

## Neighbour and local groups consulted:

Links Community centre 353 Rotherhithe new road London
London River House Royal Pier Road Gravesend, Kent
24 Ryder Drive, LONDON SE16 3BB

Agenda Item 9.2

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| | |
|---|---|
| **Meeting Name:** | **Planning Committee (Major Applications) A** |
| **Date:** | 2 July 2025 |
| **Report title:** | **Development Management planning application:**<br>Application 24/AP/3800 for: S73 Material Amendment<br><br>**Address:**<br>Chambers Wharf , Chambers Street, London, SE16 4XQ<br><br>**Proposal:**<br>Non material amendment to planning permission reference number 07/AP/1262, as amended by 13/AP/4266, to amend the description of development as set out below and to add a new condition of consent to secure the quanta of residential units and commercial floor space to be delivered:<br>Current description of development attached to reference number 13/AP/4266<br>Variation of Condition (34) (approved drawings) of planning permission 11/AP/1875 [related to parent permission 07/AP/1262 which consented the erection of six residential buildings providing 587 residential units and 275 sq. m. of flexible A/B1 floorspace at ground floor level along Chambers Street and 203 sq. m. of Class D1 floorspace along Llewellyn Street] to allow for two additional affordable dwellings to the scheme;<br><br>Proposed description of development<br>Variation of Condition 34 (Approved Drawings) of planning permission 11/AP/1875 (Related to parent permission 07/AP/1262) which consented the erection of six residential buildings and flexible Class A/B1 floorspace at ground level along Chambers Street and Class D1 floorspace along Llewellyn Street to allow for two additional affordable dwellings to the scheme. |
| **Ward(s) or groups affected:** | North Bermondsey |
| **Classification:** | Open |
| **From:** | Director of Planning and Growth |
| **Application Start Date**: 24/12/2024 | **Application Expiry Date**:<br>20/01/2025 |
| **Earliest Decision Date**: | **PPA Date:** |

## Recommendation

1. That the application for non-material changes is AGREED, subject to the recommended condition; and

## Details of the proposed non-material changes

2. Planning permission for the redevelopment of the site was granted by Southwark Council on 08 October 2010 (Ref: 07/AP/1262). This 2010 permission was subsequently amended to allow for the introduction of two additional affordable units and introduced site wide phasing through a Section 73 application granted on 06 February 2014 (Ref: 13/AP/4266). Blocks F and G of the development were built out under this later permission and it is therefore the 2014 (Ref: 13/AP/4266) permission under which the proposed variations are sought.

3. A non-material amendment application was initially submitted under reference 24/AP/1547 which was withdrawn by the applicant and replaced by application 24/AP/3800 (s96a to amended the description of development) and 24/AP/3801 (the Proposed s73 for Amendments to Blocks A, B, C, and D and associated landscaping). Under the public consultation process under 24/AP/3801, residents were made aware of this non-material amendment application (24/AP/3800) when neighbour consolation letters were issued. While public comments have been received in relation to 24/AP/3801, no public comments have been received in relation to 24/AP/3800.

4. As initially approved, the site benefits from planning permission for the erection of six residential buildings providing 587 residential units and 275m² of flexible Class A/B1 floorspace at ground floor level along Chambers Street; 203m² of Class D1 floorspace along Llewellyn Street; basement parking; service and access roads, works of hard and soft landscaping together with other works incidental to the application. The number of units was later increased to 589 through the approval of two additional affordable homes. The affordable component of the approved scheme has already been delivered on site and the proposals relate only to the private elements of the scheme.

5. As explained in the submission, the Proposed s73 amendments considered separately under ref: 24/AP/3801 will reduce the overall quantum of residential units and commercial floorspace approved by the 2014 permission. Both are referenced in the description of development but amendments to the operative part of the permission are not within the scope of section 73. This Section 96a application proposes to amend the approved description of development by removing reference to the residential unit numbers and quantum of types of non-residential floorspace and placing the unit and floorspace quanta into a new planning condition as a control point. The proposed amended description of development alongside the proposed new condition are set out as follows –

6. <u>Approved 2014 Description of Development</u>

*Variation of Condition 34 (Approved Drawings) of planning permission 11-AP-1875 (Related to parent permission 07/AP/1262) which consented the erection of six residential buildings providing 587 residential units and 275m² of flexible Class A/B1 floorspace at ground floor level along Chambers Street and 203m² of Class*

*D1 floorspace along Llewellyn Street to allow for two additional affordable dwellings to the scheme'*

Proposed Amended Description of Development
*'Variation of Condition 34 (Approved Drawings) of planning permission 11-AP-1875 (Related to parent permission 07/AP/1262) which consented the erection of six residential buildings providing residential units and flexible Class A/B1 floorspace at ground floor level along Chambers Street and Class D1 floorspace along Llewellyn Street to allow for two additional affordable dwellings to the scheme'*

7. Proposed Additional Condition (13/AP/4266)

Condition 34
*The development approved by this permission provides for 589 residential units and 275 sqm of Class E and 203sqm of Class F Floorspace*

## Planning history

8. 07/AP/1262 - The erection of six residential buildings providing 587 residential units and 275m² of flexible Class A/B1 floorspace at ground floor level along Chambers Street; 203m² of Class D1 floorspace along Llewellyn Street; basement parking; service and access roads, works of hard and soft landscaping together with other works incidental to the application. Granted 8/10/2010

11/AP/1875 - Application for non-material amendment to planning permission ref 07/AP/1262 to allow details to be discharged in phases related to the construction phases of the overall development. Variation of associated s106 agreement dated 8 October 2010 in relation to construction phases. Approved 6/07/2011

11/AP/3102 - Non-material amendments to Buildings F and G of planning permission dated 08/10/2010 (07-AP-1262) for the erection of six residential buildings providing 587 residential units and 275m² of flexible Class A/B1 floorspace at ground floor level along Chambers Street; 203m² of Class D1 floorspace along Llewellyn Street; basement parking; service and access roads, works of hard and soft landscaping together with other works incidental to the application. Amendments to the scheme:

Removal of basements
Re-organisation of building cores
Consolidation of bin stores in Building F
External entrances to Building F townhouses
Building F townhouse increased from 3 to 4 bedrooms
Entrance screen re-positioned in Building F
Internal re-planning of the 3 bed unit on typical floors
Re-positioning of the facade panels
CHP boiler flues rising to vent at roof level
Balcony depths increased to 100mm
Single entrance to Building G, secondary entrance becomes townhouse entrance
Building G footprint moved away from boundary
Re-positioned location of 1 bed wheelchair unit on typical floors of Building G

Re-organisation of the 4 bed apartment locations on typical floors in Building G
Switch of 1 and 2 bed unit locations in Building G on typical floors
Decrease of Building G townhouse from 4 to 3 bedrooms
External column introduced to Building F
Re-positioning of 3 bed wheelchair ground floor duplex

13/AP/0369 - Proposed deed of variation to the existing S106 agreement of planning permission 07/AP/1262 dated 10 October 2010 (residential development comprising 587 dwellings) to vary the terms of provision of affordable housing so that the 18 x 1-bed and 71 x 2-bed dwellings will be provided at affordable rent (circa 65% of market rent) rather than at target rent as previously permitted. The remaining affordable housing remains as previously proposed (17 x 3 bed and 13 x 4 bed affordable dwellings to be provided at target rent and 49 x 1-bed and 12 x 2-bed dwellings as shared ownership). Approved 8/04/2013

13/AP/2182 - Variation of Condition 34 (approved drawings) of planning permission 11-AP-1875 [related to parent permission 07/AP/1262 which consented the erection of six residential buildings providing 587 residential units and 275 sq. m. of flexible A/B1 floorspace at ground floor level along Chambers Street and 203 sq. m. of Class D1 floorspace along Llewellyn Street] to allow for two additional affordable dwellings to the scheme. Withdrawn 20/10/2013.

13/AP/4266 - Variation of Condition (34) (approved drawings) of planning permission 11/AP/1875 [related to parent permission 07/AP/1262 which consented the erection of six residential buildings providing 587 residential units and 275 sq. m. of flexible A/B1 floorspace at ground floor level along Chambers Street and 203 sq. m. of Class D1 floorspace along Llewellyn Street] to allow for two additional affordable dwellings to the scheme. Approved 06.02.2014[1]

15/AP/3481 - Non-material amendment to planning permission 07-AP-1262 for: 'The erection of six residential buildings providing 587 residential units and 275m² of flexible Class A/B1 floorspace at ground floor level along Chambers Street; 203m² of Class D1 floorspace along Llewellyn Street; basement parking; service and access roads, works of hard and soft landscaping together with other works incidental to the application'. The amendments consist of changes to the basement floor level to accommodate new Thames Tideway Tunnel infrastructure passing through the site. Approved 22/09/2015

[1]For the avoidance of doubt, the permission which was issued in relation to 13/AP/4266 is an amendment to the permission attached to 07/AP/1262 as varied by 11/AP/1875.

## Preliminary Matters

## Planning policy

9. This application is to be determined on matters of fact and degree and planning law in respect of the extent and effect of the proposed change to the permitted development. Matters of planning policy are not a relevant consideration.

10. The detailed planning policy relating to this development is set out in the report on the original planning application.

## Key Issues for Consideration

11. The main issue in respect of this application is to determine if the proposed changes are:

(a) non-material and do not require the submission of an application for planning permission by reason that they:

(i) do not in themselves constitute development, or

(ii) are considered to be so trivial or inconsequential that they may be regarded as *de minimis*, that is legally of no consequence, and that planning permission is not required;

or

(b) are materially different from the permitted development and require the submission of an application for planning permission.

12. This is discussed in detail in the 'Assessment' section of this report.

13. Community impact, equalities and human rights implications are relevant considerations, as is working proactively and positively with applicants and agents. These matters are discussed in the 'Assessment' section of this report.

14. 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.

## Assessment

15. The applicant proposes to amend the approved description of development by removing reference to the residential unit numbers and quantum of types of non-residential floorspace and placing the unit and floorspace quanta into a new planning condition. Officers consider the principle of this is acceptable as the heart of the permission, to deliver six blocks of residential housing and associated flexible mixed used space, would not be amended as a result of securing the quantums of development as a condition of consent. Further, due to the previously approved increase in affordable housing units, officers note that there is currently some discrepancy with the approved quantum of development and the proposed change would resolve this.

16. In regard to the proposed condition wording, officers not that the applicant has proposed that non-residential uses be secured as Class E and Class F, as opposed to flexible Class A/B1 floorspace as is secured by the current description of development. Class E has superseded Use Class A/B1, but it has also incorporated other uses which were not previously associated with Use Classes A and B1. Accordingly, officers consider it necessary to maintain the reference to Use Class A/B1 in the amended condition wording. The recommended amended description are set out below and subject to this change are considered acceptable.

17. Approved 2014 Description of Development

*Variation of Condition 34 (Approved Drawings) of planning permission 11-AP-1875 (Related to parent permission 07/AP/1262) which consented the erection of six residential buildings providing 587 residential units and 275m² of flexible Class A/B1 floorspace at ground floor level along Chambers Street and 203m² of Class D1 floorspace along Llewellyn Street to allow for two additional affordable dwellings to the scheme'*

Recommended Amended Description of Development

*'Variation of Condition 34 (Approved Drawings) of planning permission 11-AP-1875 (Related to parent permission 07/AP/1262) which consented the erection of six residential buildings providing residential units and flexible Class A/B1 floorspace at ground floor level along Chambers Street and Class D1 floorspace along Llewellyn Street to allow for two additional affordable dwellings to the scheme'*

18. Recommended Additional Condition (13/AP/4266)

Condition 35
*The development approved by this permission provides for 589 residential units and 275 square metres of flexible Class A/B1 floorspace at ground floor level along Chambers Street and 203 square metres of Class D1 floorspace along Llewellyn Street.*

19. Overall the proposed changes, individually, as a group, and together with previously approved non-material amendments, are considered to be non-material.

## Community Impact and Equalities Assessment

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

21. The Council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.

22. The Public Sector Equality Duty (PSED) contained in Section 149 (1) of the Equality Act 2010 imposes a duty on public authorities to have, in the exercise of their functions, due regard to three "needs" which are central to the aims of the Act:
    1. The need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act
    2. The need to advance equality of opportunity between persons sharing a relevant protected characteristic and persons who do not share it. This involves having due regard to the need to:
        - Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
        - Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it, and;

- Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

3. The need to foster good relations between persons who share a relevant protected characteristic and those who do not share it. This involves having due regard, in particular, to the need to tackle prejudice and promote understanding.

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

## Human Rights Implications

24. 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.

25. This application has the legitimate aim of providing the details required by a grant of planning permission. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

## Positive and Proactive Statement

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

27. 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.

## 28. 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 statutory | NO |

| | |
|---|---|
| determination date? | |

## Conclusion on the Materiality of the Changes

29. As explained in detail in the 'Assessment' part of this report, the proposed changes are considered to be 'non-material', subject to the recommended amended description and additional condition. Accordingly, it is recommended that the application be granted, subject to the amended description and added condition of consent below which would be considered as applying to ref 13/AP/4266 and its associated amendment.

Recommended Amended Description of Development

*'Variation of Condition 34 (Approved Drawings) of planning permission 11-AP-1875 (Related to parent permission 07/AP/1262) which consented the erection of six residential buildings providing residential units and flexible Class A/B1 floorspace at ground floor level along Chambers Street and Class D1 floorspace along Llewellyn Street to allow for two additional affordable dwellings to the scheme'*

Recommended additional Condition
Condition 35 (considered as attached to 13/AP/4266)
*The development approved by this permission provides for 589 residential units and 275 square metres of flexible Class A/B1 floorspace at ground floor level along Chambers Street and 203 square metres of Class D1 floorspace along Llewellyn Street.*

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

## BACKGROUND INFORMATION

## BACKGROUND DOCUMENTS

| Background Papers | Held At | Contact |
|---|---|---|
| Site history file:<br>Application file: 24/AP/3800<br>Southwark Local Development Framework and Development Plan Documents | Resources Department, attention Strategic Planning Applications, 160 Tooley Street London SE1 2QH | Planning enquiries telephone: 020 7525 5403<br>Planning enquiries email: planning.enquiries@southwark.gov.uk<br>Case officer telephone: 0207 525 0254<br>Council website: www.southwark.gov.uk |

## APPENDICES

| No. | Title |
|---|---|
| Appendix 1 | Recommendation (draft decision notice) |
| Appendix 2 | Planning history of the site and nearby sites |

## AUDIT TRAIL

| | | |
|---|---|---|
| **Lead Officer** | Steve Platts, Director of Planning and Growth | |
| **Report Author** | Andy Sloane, Senior Planning Officer | |
| **Version** | Final | |
| **Dated** | 23 June 2025 | |
| **Key Decision** | No | |
| **CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER** | | |
| **Officer Title** | **Comments Sought** | **Comments included** |
| Strategic Director of Resources | No | No |
| Strategic Director of Environment, Sustainability and Leisure | No | No |
| Strategic Director of Housing | No | No |
| **Date final report sent to Constitutional Team** | | 23 June 2025 |

**Appendix 1**

# Recommendation

This document shows the case officer's recommended decision for the application referred to below.

This document is not a decision notice for this application.

---

| | | | |
|---|---|---|---|
| **Applicant** | C/O Agent | **Reg. Number** | 24/AP/3800 |
| **Application Type** | S.96a non-material amendment | | |
| **Recommendation** | AGREE changes are considered to be 'non-material' | **Case Number** | 24/AP/3800 |

## Draft of Decision Notice

**The determination is AGREE changes are considered to be 'non-material' for the following development:**

Amended Description of Development (considered as attached to 13/AP/4266)

*'Variation of Condition 34 (Approved Drawings) of planning permission 11-AP-1875 (Related to parent permission 07/AP/1262) which consented the erection of six residential buildings providing residential units and flexible Class A/B1 floorspace at ground floor level along Chambers Street and Class D1 floorspace along Llewellyn Street to allow for two additional affordable dwellings to the scheme'*

**In accordance with application received on** 24/12/2024 **and Applicant's Drawing Nos.**:

Existing Plans: LOCATION PLAN 002 P6

Proposed Plans: N/A no amendments to plans proposed.

Other Documents: COVERING LETTER LE/OMJ/DP6644 dated 23 December 2024)

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

Recommended additional Condition

Condition 35 (considered as attached to 13/AP/4266)
*The development approved by this permission provides for 589 residential units and 275 square metres of flexible Class A/B1 floorspace at ground floor level along Chambers Street and 203 square metres of Class D1 floorspace along Llewellyn Street.*

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

**Appendix 2**

**(**

**Relevant planning history)**

07/AP/1262 - The erection of six residential buildings providing 587 residential units and 275m² of flexible Class A/B1 floorspace at ground floor level along Chambers Street; 203m² of Class D1 floorspace along Llewellyn Street; basement parking; service and access roads, works of hard and soft landscaping together with other works incidental to the application. Granted 8/10/2010

11/AP/1875 - Application for non-material amendment to planning permission ref 07/AP/1262 to allow details to be discharged in phases related to the construction phases of the overall development. Variation of associated s106 agreement dated 8 October 2010 in relation to construction phases. Approved 6/07/2011

11/AP/3102 - Non-material amendments to Buildings F and G of planning permission dated 08/10/2010 (07-AP-1262) for the erection of six residential buildings providing 587 residential units and 275m² of flexible Class A/B1 floorspace at ground floor level along Chambers Street; 203m² of Class D1 floorspace along Llewellyn Street; basement parking; service and access roads, works of hard and soft landscaping together with other works incidental to the application. Amendments to the scheme:

Removal of basements
Re-organisation of building cores
Consolidation of bin stores in Building F
External entrances to Building F townhouses
Building F townhouse increased from 3 to 4 bedrooms
Entrance screen re-positioned in Building F
Internal re-planning of the 3 bed unit on typical floors
Re-positioning of the facade panels
CHP boiler flues rising to vent at roof level
Balcony depths increased to 100mm
Single entrance to Building G, secondary entrance becomes townhouse entrance
Building G footprint moved away from boundary
Re-positioned location of 1 bed wheelchair unit on typical floors of Building G
Re-organisation of the 4 bed apartment locations on typical floors in Building G
Switch of 1 and 2 bed unit locations in Building G on typical floors
Decrease of Building G townhouse from 4 to 3 bedrooms
External column introduced to Building F
Re-positioning of 3 bed wheelchair ground floor duplex

13/AP/0369 - Proposed deed of variation to the existing S106 agreement of planning permission 07/AP/1262 dated 10 October 2010 (residential development comprising 587 dwellings) to vary the terms of provision of affordable housing so that the 18 x 1-bed and 71 x 2-bed dwellings will be provided at affordable rent (circa 65% of market rent) rather than at target rent as previously permitted. The remaining affordable housing remains as previously proposed (17 x 3 bed and 13 x 4 bed affordable dwellings to be provided at target rent and 49 x 1-bed and 12 x 2-bed dwellings as shared ownership). Approved 8/04/2013

13/AP/2182 - Variation of Condition 34 (approved drawings) of planning permission

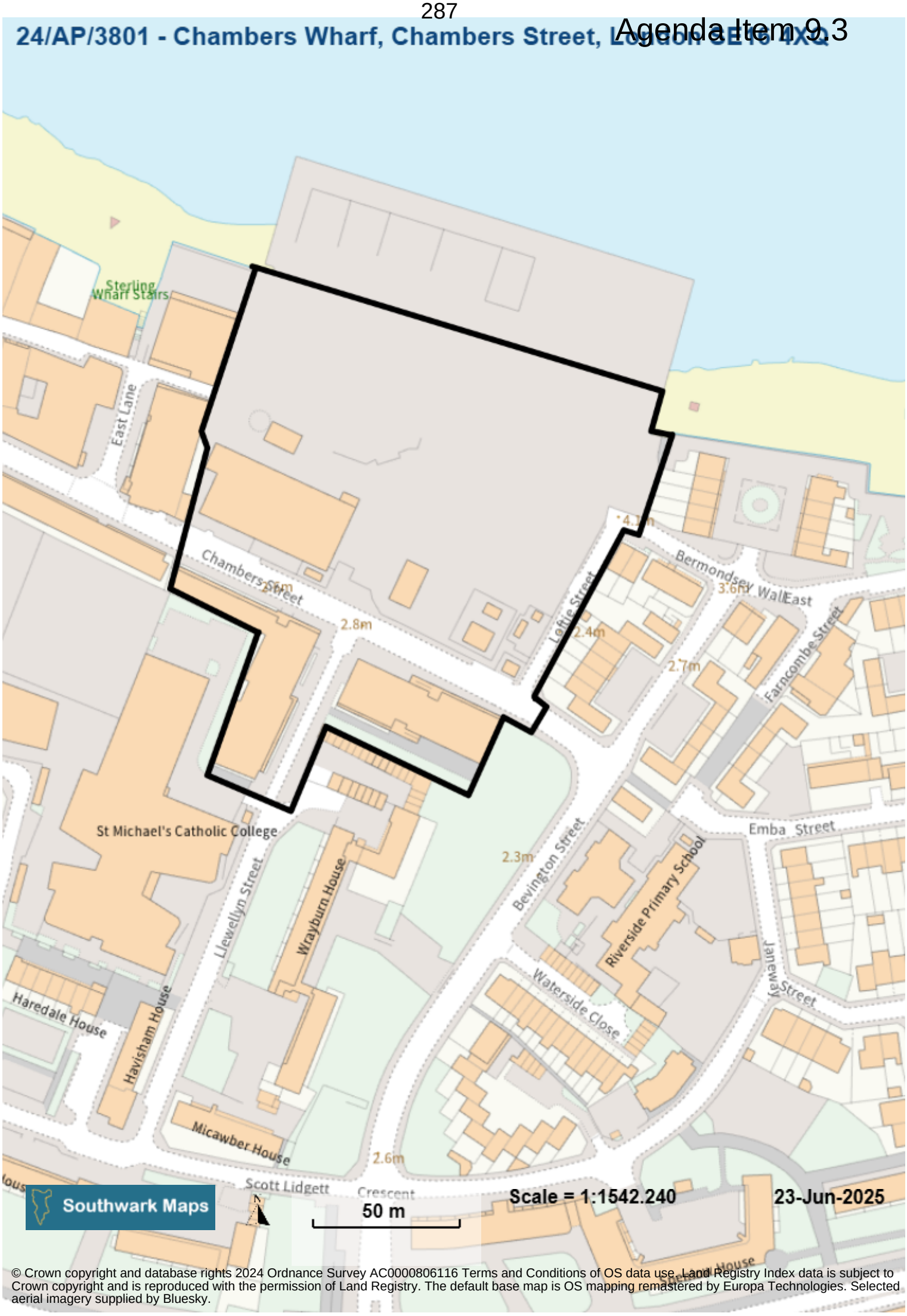
11-AP-1875 [related to parent permission 07/AP/1262 which consented the erection of six residential buildings providing 587 residential units and 275 sq. m. of flexible A/B1 floorspace at ground floor level along Chambers Street and 203 sq. m. of Class D1 floorspace along Llewellyn Street] to allow for two additional affordable dwellings to the scheme. Withdrawn 20/10/2013.

13/AP/4266 - Variation of Condition (34) (approved drawings) of planning permission 11/AP/1875 [related to parent permission 07/AP/1262 which consented the erection of six residential buildings providing 587 residential units and 275 sq. m. of flexible A/B1 floorspace at ground floor level along Chambers Street and 203 sq. m. of Class D1 floorspace along Llewellyn Street] to allow for two additional affordable dwellings to the scheme. Approved 06.02.2014[1]

15/AP/3481 - Non-material amendment to planning permission 07-AP-1262 for: 'The erection of six residential buildings providing 587 residential units and 275m² of flexible Class A/B1 floorspace at ground floor level along Chambers Street; 203m² of Class D1 floorspace along Llewellyn Street; basement parking; service and access roads, works of hard and soft landscaping together with other works incidental to the application'.  The amendments consist of changes to the basement floor level to accommodate new Thames Tideway Tunnel infrastructure passing through the site. Approved 22/09/2015

[1]For the avoidance of doubt, the permission which was issued in relation to 13/AP/4266 is an amendment to the permission attached to 07/AP/1262 as varied by 11/AP/1875.

# 24/AP/3801 - Chambers Wharf, Chambers Street, London SE16 4XQ

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| | |
|---|---|
| **Meeting Name:** | **Planning Committee (Major Applications) A** |
| **Date:** | 2 July 2025 |
| **Report title:** | **Development Management planning application:** Application 24/AP/3801 for: S73 Material Amendment Application<br><br>**Address:** Chambers Wharf, Chambers Street, London, SE16 4XQ<br><br>**Proposal:** Material amendment under section 73 of the Town and Country Planning Act 1990 to reference number 07/AP/1262, as amended by 13/AP/4266, to secure amendments to **Blocks A, B, C, D and associated landscape only including amendments to** the internal configuration, external design and overall massing, mix and unit numbers, and variation of the conditions of consent including to allow for:<br>• Changes to façade design and composition of all buildings to meet updated fire regulations and energy and sustainability standards as well as addressing overheating;<br>• Adjustments to building footprint, form, and massing;<br>• Internal reconfiguration of units to address the current Nationally Described Space Standards, resulting in a change in mix and a reduction in units from 589 to 566;<br>• Re-organisation of building cores, additional staircases and inclusion of additional fire safety features including sprinklers;<br>• Change from winter gardens to a mix of winter gardens and balconies;<br>• Addition of plant, lift overruns, smoke vents and risers on the roof of buildings, contributing to overall increases in building massing and heights ranging between 3.9 and 4.9 metres;<br>• Addition of new residential amenity facilities in Building A, C and D, including swimming pool a gym uses;<br>• Amendments to condition 34 to reflect the reduction in commercial floorspace by 113m2;<br>• Inclusion of revised energy strategy, facilitated by inclusion of rooftop plant;<br>• Amendment to basement layout to accommodate Thames Tideway Tunnel infrastructure;<br>• Rise in finished floor level of building C for flood protection. |

| | |
|---|---|
| | Application 07/AP/1262 was accompanied by an Environmental Statement pursuant to the Town and Country Planning Act 1990, which can be viewed on southwark.gov.uk/planningregister under reference 07/AP/1262. This application is supported by a note prepared Trium dated March 2025 assessing the compliance against the Environmental Statement, which can be viewed on southwark.gov.uk/planningregister under reference 24/AP/3801. Copies of the application documents are available by request. |
| **Ward(s) or groups affected:** | North Bermondsey |
| **Classification:** | Open |
| **Reason for lateness (if applicable):** | Not Applicable |
| **From:** | Director of Planning and Growth |
| **Application Start Date**: 24/12/2024 | |
| **Earliest Decision Date**: 25/03/2025 | |

## Recommendation

1. That planning permission be granted subject to revised conditions to those on the existing permission and the completion of a deed of variation to the existing s106 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 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

4. That the Planning Committee in making its decision has due regard to the potential equalities impacts that are outline in this report; and

5. 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 Environmental Impact Assessment Regulations; and

6. That following issue of the planning permission, the Director of Planning and Growth shall place a statement on the statutory register pursuant to regulation 28 of the Environmental Impact Assessment Regulations and for the purposes of regulation 28(1)(h) the main reasons and considerations on which the local planning authority's decision is based shall be set out as in this report; and

7. That in the event that the requirements of paragraph 1 above are not met by 30 September 2025, the Director of Planning and Growth be authorised to refuse planning permission, if appropriate, for the development not complying with IP3 of the Southwark Plan 2022

## Executive Summary

8. Planning permission for the redevelopment of the site was granted by Southwark Council on 08 October 2010 (Ref: 07/AP/1262). This 2010 permission was subsequently amended to allow for the introduction of two additional affordable units and introduced site wide phasing through a Section 73 application granted on 06 February 2014 (Ref: 13/AP/4266). Blocks F and G of the development were built out under this later permission and it is therefore the 2014 (Ref: 13/AP/4266) permission under which the proposed variations are sought.

9. The focus of this application is the site Blocks A, B, C, D and the landscaping associate with these blocks. This area of the site has been used as a main construction site for the Thames Tideway Tunnel (TTT), a new combined sewer running from West to East London, which has meant that this portion of the scheme has been unable to proceed. The TTT scheme was established by a development consent order and by LBS reference 14/AP/0000, and subsequent associated applications. The TTT project on this site is due to complete in 2025, and following the completion of TTT works the site will be available for the residential development on the site to proceed. Officers note that the phasing of the development was established by non-material amendment application 11/AP/1875 which was approved by the Council on 6/07/2011 to enable the early delivery of the affordable housing (Buildings F and G) in acknowledgement of the impacts of the TTT project on the Chambers Wharf development. To achieve this, the approved conditions were amended alongside an associated deed of variation to the s106 which established that the development was to proceed in four construction phases, which are:
Phase 1 – Blocks F and G (affordable housing component),
Phase 2 – Blocks A and B,
Phase 3 – Block C, and
Phase 4 – Block D.

Further to the above, the basement level underneath Buildings A, B, C, and D was amended to accommodate the TTT requirements under LBS application reference 15/AP/3481.

10. This application seeks to secure amendments to the internal configuration, external design and changes to the overall massing, mix and unit numbers through the variation of condition 1 (approved drawings) of the 2014 permission, and these changes are described in more detail below.

11. The proposed changes relate only to buildings A, B, C, D and the associated landscaping and in summary the proposed changes are:

- Changes to façade design and composition of all buildings to meet updated fire regulations and energy and sustainability standards as well as addressing overheating;
- Adjustments to building footprint, form, and massing;
- Internal reconfiguration of units to address the current Nationally Described Space Standards, resulting in a change in mix and a reduction in units from 589 to 566;
- Re-organisation of building cores, additional staircases and inclusion of additional fire safety features including sprinklers;
- Change from winter gardens to a mix of winter gardens and balconies;
- Addition of plant, lift overruns, smoke vents and risers on the roof of buildings, contributing to overall increases in building massing and heights ranging between 3.9 and 4.9 metres;
- Addition of new residential amenity facilities in Building A, C and D, including swimming pool a gym uses;
- Amendments to condition 34 to reflect the reduction in commercial floorspace by 113m2;
- Inclusion of revised energy strategy, facilitated by inclusion of rooftop plant;
- Amendment to basement layout to accommodate Thames Tideway Tunnel infrastructure; and
- Rise in finished floor level of building C for flood protection.

12. Officers note that there the proposed drawings show Blocks F and G as approved under the 2007 submission (planning reference 07/AP/1262), as opposed to the drawings approved under the subsequent amended proposal under references 11/AP/1875, 13/AP/4266, and 15/AP/3481. The applicant has confirmed that no amendments are proposed to the approved plans for Blocks F and G which were completed around 2015. For the avoidance of doubt, the description of development has been updated to confirm that the proposed amendments relate only to Buildings A, B, C, D and the associated landscaping. Further, for the avoidance of doubt, an informative has been added to confirm the approved drawings which relate to Blocks F and G.

13. Application 07/AP/1262 was accompanied by an Environmental Statement pursuant to the Town and Country Planning Act 1990. The current application is supported by a note on compliance with the existing Environmental Statement which was prepared Trium and is dated March 2025. An updated and revised package of condition and obligations is recommended which would secure the necessary mitigation measures and policy compliance for most assessment topics. However, further daylight and sunlight losses to neighbouring properties have been identified; these are considered in more detail below. The likely equalities impacts from the revised scheme have been considered.

14. As set out above, since construction has begun on the site, the site was temporarily acquired for use as part of the TTT development, which prevented the progression of the approved residential development on site. The introduction of the new fire regulations, together with changing energy and sustainability requirements, a number of changes have been proposed in order to meet the new requirements and to enable the deliverability of the remainder of the development.

15. The proposed amendments allow the site to continue to provide substantial public benefits, stemming from the mixed-use redevelopment of a brownfield site, which in turn makes a significant contribution to delivering the vision and objectives of the development plan, including in relation to Southwark Plan 2022 Site Allocation NSP15 (Chambers Wharf).

16. It is recognised that there would continue to be some degree of harm to surrounding residential amenity (as was the case under the original permitted development), and again, on balance, while recognising the impacts, it is concluded that the merits of the scheme, and the context within which it would sit, would not justify the refusal of planning permission. Officers consider that the balance continues to weigh in favour of the development.

17. Having given this application careful consideration to weigh the balance of the proposed amendments to the scheme, officers recommend the application for approval, subject to revised conditions (updated versions of those on the existing permission as well as new conditions to address further policy areas), and completion of a deed of variation to the existing s106 agreement.

Planning Summary – Tables

Approved Scheme – Summary of Blocks A, B, C, and D only

| Private Homes | Block A | Block B | Block C | Block D | Homes Total | % of total |
|---|---|---|---|---|---|---|
| 1-bed/1P (Studio) | 2 | 0 | 0 | 4 | 6 | 1.47% |
| 1-bed/ 1P-2P* | 58 | 58 | 49 | 1 | 166* | 40.79% |
| 2-bed/3p | 41 | 56 | 40 | 13 | 150 | 36.86% |
| 2-bed/4p | | | | | | |
| 3-bed/4p | 10 | 26 | 26 | 23 | 85 | 20.88% |
| 3-bed/5p | | | | | | |
| 3-bed/6p | | | | | | |
| 4-bed/8p | 0 | 0 | 0 | 0 | 0 | 0% |

| | | | | | | |
|---|---|---|---|---|---|---|
| Total and % of total | 111 | 140 | 115 | 41 | 407 | |

* Under the current policy guidance,158 of these units would be assessed as 1Bedroom 1person flats as they are less than 50sqm.

Proposed Scheme - Blocks A, B, C, and D only

| Private Homes | Block A | Block B | Block C | Block D | Homes Total | % of total |
|---|---|---|---|---|---|---|
| 1-bed/1P (Studio) | 17 | 14 | 22 | 1 | 54 | 14.06% |
| 1-bed/2P | 17 | 37 | 32 | 3 | 89 | 23.18% |
| 2-bed/3p | 17 | 25 | 8 | 8 | 58 | 15.10% |
| 2-bed/4p | 24 | 35 | 32 | 5 | 96 | 25.00% |
| 3-bed/4p | 8 | 0 | 0 | 0 | 8 | 2.08% |
| 3-bed/5p | 0 | 11 | 0 | 12 | 23 | 5.99% |
| 3-bed/6p | 9 | 13 | 23 | 8 | 53 | 13.80% |
| 4-bed/8p | 1 | 1 | 1 | 0 | 3 | 0.78% |
| Total and % of total | 93 | 136 | 118 | 37 | 384 | |

| Habitable rooms | Consented * | Proposed | % Change |
|---|---|---|---|
| Building A | 317 | 280 | -11.67% |
| Building B | 447 | 428 | -4.25% |
| Building C | 344 | 367 | 6.69% |
| Building D | 164 | 152 | -7.32% |
| Total | 1272 | 1227 | -3.54% |

*For an equal comparison, the applicant has calculated habitable rooms for both the consented and proposed scheme in line with the Council's current Section 106 and CIL SPD which stipulates any room that is over 28sqm will be considered as two habitable rooms.

| Height change AOD | Consented | Proposed | Change |
|---|---|---|---|
| Building A | 34.5 | 39.2 | 4.7 |

| | | | |
|---|---|---|---|
| Building B | 43.5 | 48.28 | 4.78 |
| Building C | 40.5 | 44.42 | 3.92 |
| Building D | 49 | 53.41 | 4.41 |

Use class changes

| Use Class | Existing sqm | Proposed sqm | Change +/- sqm |
|---|---|---|---|
| Ancillary residential uses (use class C3) Building A | 0 | Resident's Lounge 103<br><br>Spa (inc changing) 95<br><br>Swimming Pool 179<br><br>Cinema Room 43<br><br>Fitness suite 46<br><br>Gym 229 | +695 |
| Use Class A/B1 Building B | 150 | 78 | -72 |
| Use Class A/B1 Building C | 127 | 86 | -41 |
| Ancillary residential uses (use class C3) Building C | 0 | Residents' amenity 104 | +104 |
| Ancillary residential uses (use class C3) Building D | 0 | Residents' amenity 120 | +120 |
| | | | |
| Total Use Class A/B1 | 277 | 164 | -113 |
| Total Ancillary residential uses (use class C3) | 0 | 919 | +919 |

Public realm

| | Existing sqm | Proposed sqm | Change +/- |
|---|---|---|---|
| Public realm | 4,620 | 4,880 | +260 |
| Communal external amenity (for residents use only) | | | |
| Building A | | 321* | |

| | | | |
|---|---|---|---|
| Building B | | 921 | |
| Building C | | 844 | |
| Building D | | 0 | |
| Play space | | 470** | |

**This area of communal external amenity space includes 100sqm of play space.*

***100sqm to be included within communal external amenity space for Building A and remainder (370sqm) to be confirmed at the submission of details stage and included either within communal external amenity space or public realm*

| Sustainability and environment | |
|---|---|
| CO2 savings beyond Part L Building Regulations | 65% over Part L 2021 at Be Lean Stage<br><br>% over Part L 2021 reduction at Be Green Stage to be established through discharge of details with minimum offset payment of £280,107 proposed |
| Trees lost | N/A |
| Trees gained | To be established through discharge of landscape details in accordance with extant permission. A minimum of 5 additional street trees on Chambers Street secured by condition. |

| | Existing | Proposed | Change +/- |
|---|---|---|---|
| Urban Greening Factor | 2.9 | No amendments proposed to landscaping plan / UGF of 4.0 to be secured via condition and assessed at submission of details stage | Increase of +1.1 to be secured by condition |
| EVCPS (on site) | | | |
| Car parking spaces | 163 and 24 motor cycle spaces | 100 (including 44 regular parking space and 56 Blue Badge spaces) and 24 motor cycle spaces | -63 |
| Cycle parking spaces | 450 2 tier | 670 comprising:<br><br>608 2 tier (90%)<br>34 larger tubular stands (5.07%)<br>28 tubular stands (4.17%) | +220 |

| | |
|---|---|
| Southwark CIL (estimated) | £401,999.06 |
| MCIL (estimated) | £93,768.91 |
| Section 106 contributions | £294,168.00 |

## Background Information

## Site location and description

18. The application site is approximately 2ha and is located on Chambers Street. The site comprises three plots. Plot 1 (1.0102 ha) is located between Chambers Street and the River Thames and currently acts as the a main construction site for the Thames Tideway Tunnel (TTT) which is a combined sewer running from west to east London. This application focuses on Plot 1. As set out above, Blocks F and G to the south of Chambers Street have already been developed by the applicant and where completed in 2015.

To the north of Plot 1, the application site, is the River Thames.

The east of the application site is bounded by Loftie Street and Bermondsey Wall East. The nearest developed sites to the east are Fountain House, 210-212 Bermondsey Wall East, and 8-14 Fountain Green Square.

To the south of the application site is Chambers Street and the developed part of the consented scheme known as Blocks G (Jacobs House) and F (Hartley House).

To the west of the site are the Luna House and Axis Court residential developments which front East Lane and Bermondsey Wall West, which terminates into the application site.

As noted above, the application site has been used as a main construction site for the TTT a project. The applicant advises that TTT works on the application site are due to be completed in 2025 and some associated infrastructure will remain on site and be integrated into the development on the application site.

19. The site is subject to the following designations:

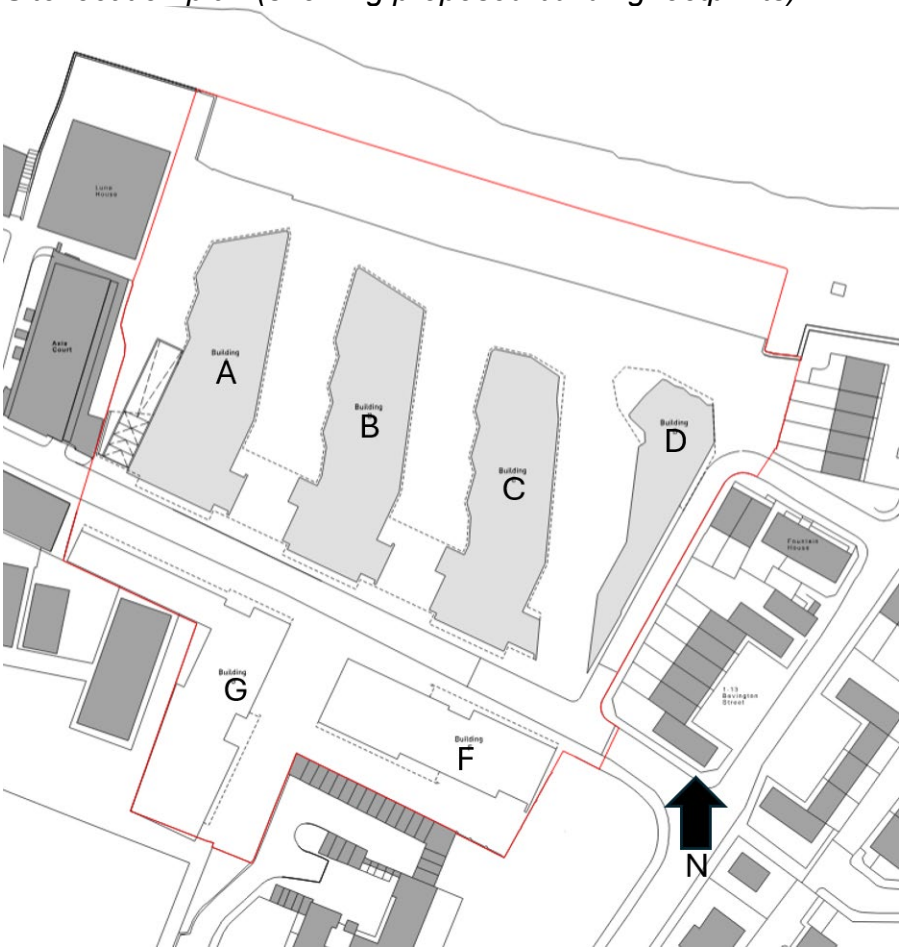
- NSP15 Site Allocation Chambers Wharf
- Area Vision: AV.03 Bermondsey
- London View Management Framework Landmark Viewing Corridor (Greenwich Park Wolfe statue to St Paul's Cathedral) – North eastern site corner only
- London View Management Framework Wider Setting Consultation Area (Greenwich Park Wolfe statue to Tower Bridge WSCA)
- London Views Management Framework – Extended background vistas (Primrose Hill summit to St Paul's Cathedral)
- Thames Policy Area
- Archaeological Priority Area
- Hot food takeaway primary and secondary school exclusion zone
- Urban Zone
- Air Quality Management Area
- Partially within The River Thames and tidal tributaries Site of Importance for Nature Conservation

- Partially within National Cycle Network NCN 4
- Flood Zone 3 (flood-map-for-planning.service.gov.uk)

The site is not within a conservation area, and there are no listed buildings within it. It is situated within the wider setting of conservation areas and lies between St Saviours Dock Conservation Area and Edward III's Rotherhithe Conservation Area. As set out in NSP15 of the Southwark Plan the site is not considered to impact a Scheduled Ancient Monument. As set out in NSP15 of the Southwark Plan, the site is within the setting of heritage assets including the setting of the Grade II listed buildings Riverside School, the Old Justice Public House, 33 Bermondsey Wall West and East Lane Stairs. Further, as noted above, the site lies within the river prospect Borough View from Kings Stairs Gardens to Tower Bridge and the site lies within LVMF view 5A.2 - Greenwich Park Wolfe Statue to Tower Bridge and St Paul's Cathedral.

- 

20. *Site location plan (showing proposed building footprints)*



21. The photographs below show the appearance of the site.

*Aerial photo taken in 2019-2020 showing part of the site in use for the delivery of the Thames Tideway Tunnel*

22. There are no tree preservation orders in place on or around the site.

## Details of proposed amendments

23. The proposed development is summarised in the Design and Access Statement (DAS), covering letter, and EIA compliance note and the explanations in these documents are summarised below. Further, the DAS states that it should be read in conjunction with the Design and Access Statement (planning application ref. 13/AP/4266) submitted in support of the approved planning application.

24. The Applicant, St James, bought the site from St Martins who held the initial planning permission. The development comprises four phases, of which Phase 1 (Blocks F and G) has been delivered, and Phase 2 (Blocks A-B), Phase 3 (Block C), and Phase 4 (Block D) remain undelivered as the site has been in use for the delivery of the Thames Tideway Tunnel (TTT) development. With the site due to be released from the TTT in 2025, the Applicant is seeking to complete Phases Two to Four of the consented scheme under Ref: 13/AP/4266. However, given the date of this permission, the nature of the scheme at that time and the need to bring it up to current standards in terms of fire regulations, building regulations, space standards and market-led expectations, the applicant considers it is necessary to secure a series of amendments to the buildings and basement. The architects who completed the originally approved designs, SimpsonHaugh, have been retained and have prepared the designs for the current proposal.

25. The changes proposed do not include any amendments to Phase 1 of the development which has already been delivered, although it is within the same red line application site. The proposed amendments and changes related to the TTT delivery mean drawings need to be amended and some conditions are no longer relevant, and accordingly the approved conditions need to be amended as part of the proposals.

26. In summary the proposed site-wide changes include:

- Changes to façade design and composition of all buildings to meet updated fire regulations and energy and sustainability standards as well as addressing overheating;
- Adjustments to building footprint, form, and massing;
- Internal reconfiguration of units to address the current Nationally Described Space Standards, resulting in a change in mix and a reduction in units from 589 to 566;
- Re-organisation of building cores, additional staircases and inclusion of additional fire safety features including sprinklers;
- Change from winter gardens to a mix of winter gardens and balconies;
- Addition of plant, lift overruns, smoke vents and risers on the roof of buildings, contributing to overall increases in building massing and heights ranging between 3.9 and 4.9 metres;
- Addition of new residential amenity facilities in Building A, C and D, including swimming pool a gym uses;
- Amendments to condition 34 to reflect the reduction in commercial floorspace by 113m2;
- Inclusion of revised energy strategy, facilitated by inclusion of rooftop plant;
- Amendment to basement layout to accommodate Thames Tideway Tunnel infrastructure;
- Rise in finished floor level of building C for flood protection.

27. The relevant visual examples of these changes are shown below:

*Comparison of Consented (Blue) and Proposed Red) massing and height*

*Buidling A*

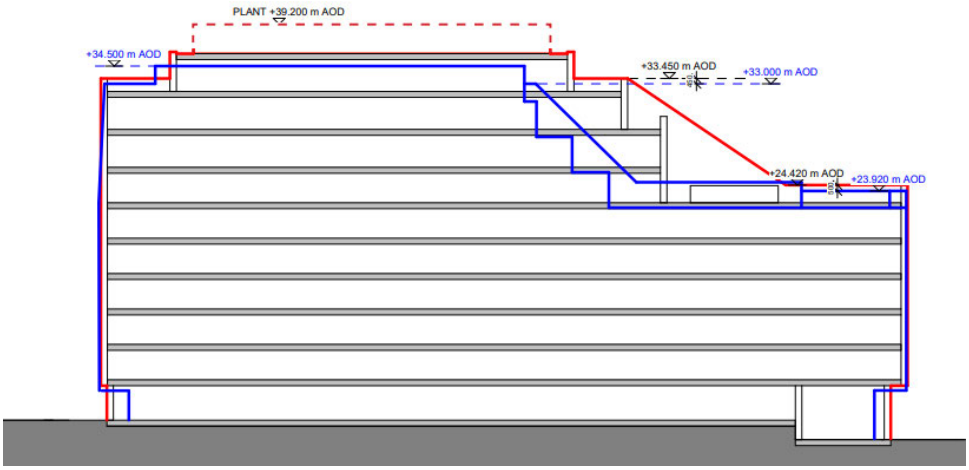



*Figure 1 Height and massing increases Building A*

*Buidling B*

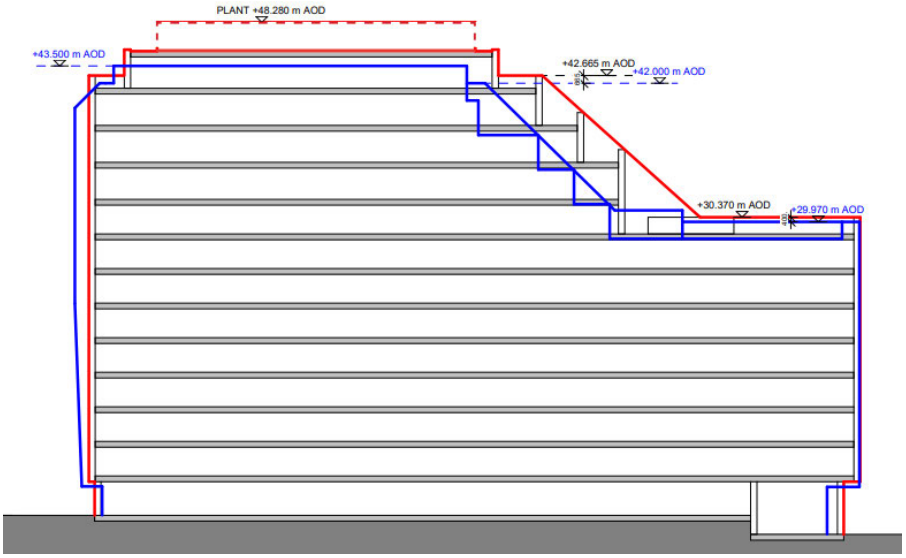



*Figure 2 Height and massing increases Building B*

*Building C*

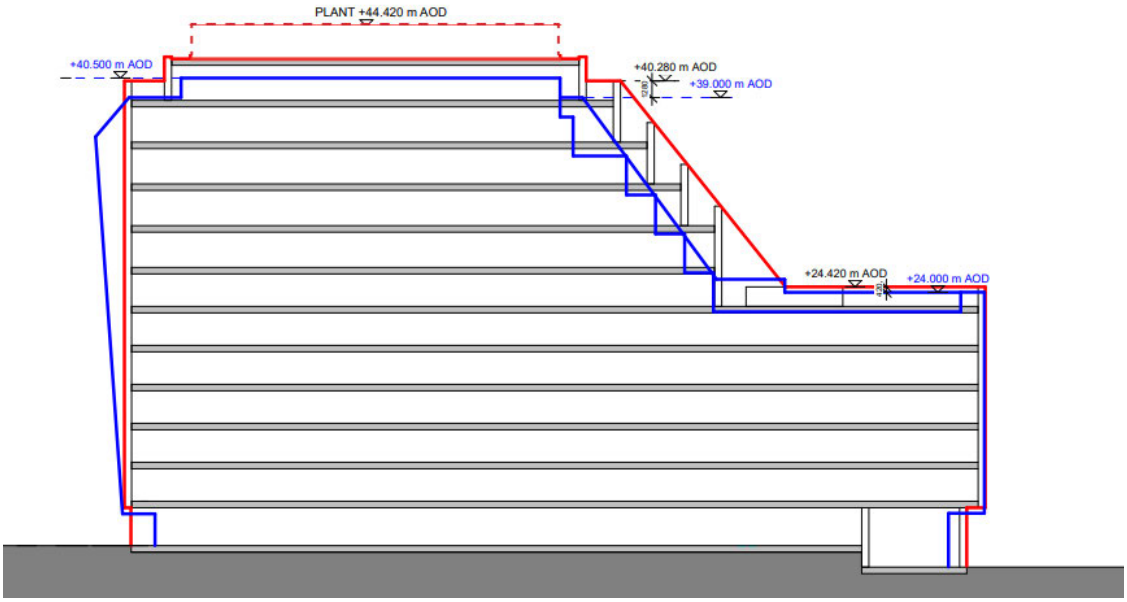



*Figure 3 Height and massing increases Building C*

*Building D*

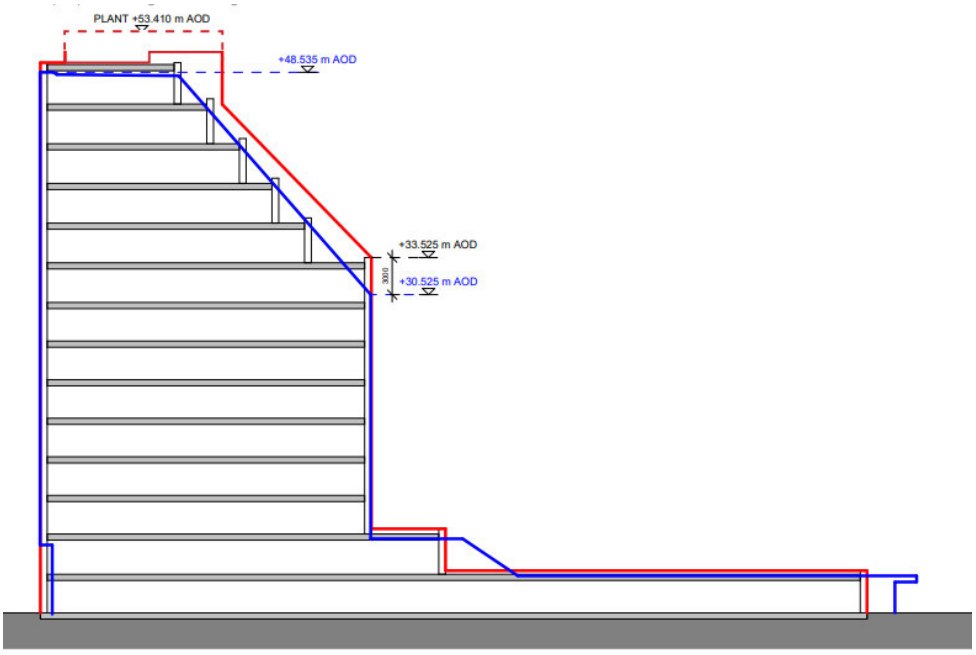
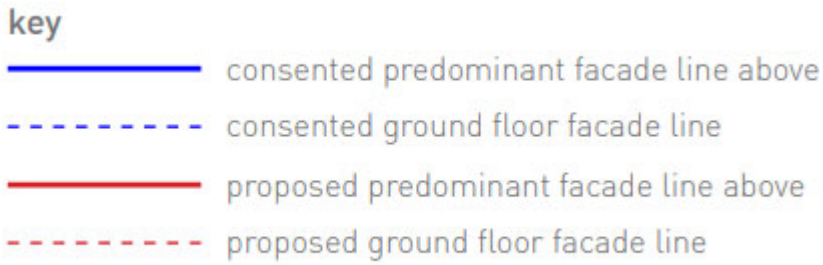



*Figure 4 Height and massing increases Building D*

*Comparison of Consented (Blue) and Proposed Red) layout*




*Predominant façade lines*

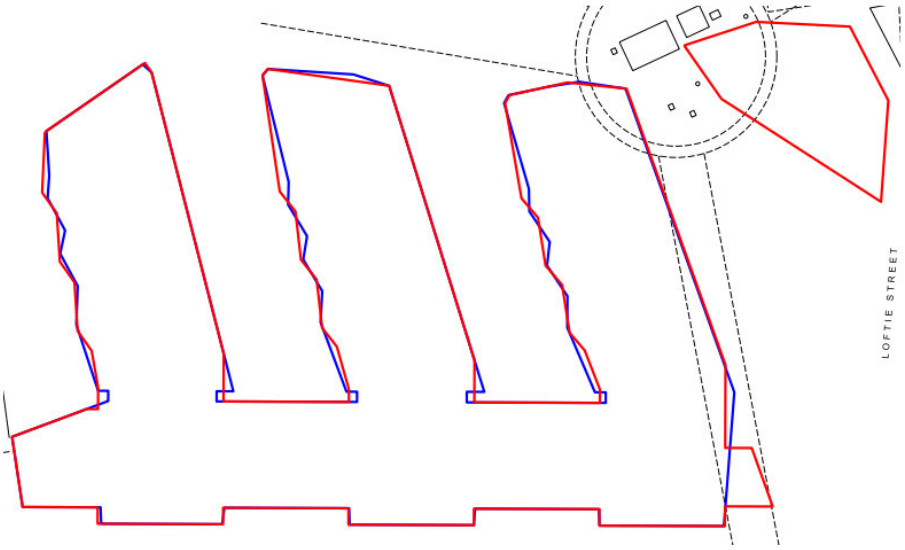



*Figure 5 Updated predominant facade lines shown in red*

*Ground floor façade lines*

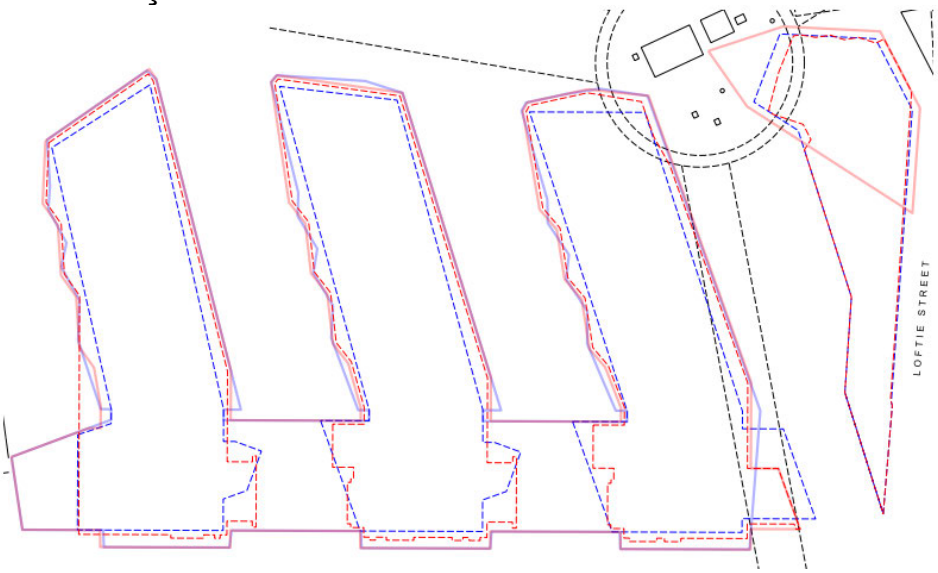



*Figure 6 Updated ground floor facade lines shown in red*

*Visual of the approved scheme*

*Figure 7 Approved - East end of Chambers Street looking west*

*Figure 8 Approved - West end of Chambers Street looking east*

*Figure 9 Approved - Bermondsey Wall East (adjacent to the Old Justice public house) looking west*

*Visual of Proposed Scheme*

*Figure 10 Proposed - East end of Chambers Street looking west*

*Figure 11 Proposed - West end of Chambers Street looking east*

*Figure 12 Proposed - Bermondsey Wall East (adjacent to the Old Justice public house) looking west*

28. The TTT infrastructure occupies an area of 460sqm on the site comprising the shaft chamber, ventilation chamber and surface ventilation shafts, services kiosk, and a further maintenance area of approximately 1,370sqm (including the 460sqm). As set out in the DAS, the TTT infrastructure imposes the following key constraints upon the residential development:

- The extent of the basement has been revised to accommodate the shaft chamber protection zones – consented through a non-material amendment in September 2015;
- The main shaft chamber needs to remain independent from structures of the residential development;
- Structural implications for Buildings C and D, the footprints of which both extend over the shaft chamber; and
- Retained infrastructure and maintenance requirements for the lifetime of the development which have implications upon the external landscaping and uses and extent of Buildings C and D at ground level.

29. Given the substantive works that TTT undertook across the site in delivering their infrastructure, there are a number of planning conditions from the 2014 permission which the applicant considers are no longer valid, or applicable to the proposed development. As such this application proposes the deletion of the following planning conditions –
2 Building Recording
3 Archaeological Mitigation Strategy
4 Archaeological Work - River Wall/Deck

5 Archaeological Reporting
6 Feasibility Study For River - Spoilt/Construction Material
7 Jetty Removal Method Statement
8 Bat/Reptile Survey
10 River Wall Condition Survey & Flood Defence Works
13 River Wall/Jetty Works
14 Contamination
20 Tree Protection
24 Sound Insulation – Community Space
25 CHP Feasibility Study

These are considered within this report and recommendations are made whether the existing conditions should deleted or amended..

30. The applicant has amended the scheme to accord with Approved Document B 2022 (Department for Levelling Up, Housing and Communities consultation) and the GLA's Fire Safety London Plan Guidance (LPG) including by the following changes:

- Second staircase added to buildings over 18m;
- Sprinklers included (including commercial sprinkler tanks in basement) and additional smoke ventilation added; and
- Winter garden compartmentation achieved by horizontal and vertical solid panels added to façade which affects façade materiality and architectural expression.

31. Further amendments to the scheme were required in relation to building control, space standards, and flooding, including:

- To meet energy and overheating regulations; façade wall thickness has been increased, floor to floor heights have increased in certain locations, the proportion of solid façade has been increased, openable windows and ventilation panels have been added. This affects internal planning, building heights and façade composition.
- A revised energy strategy (low temperature air source heat pump) has been introduced to meet energy regulations. This adds rooftop plant, requires additional plant in the basement and affects internal planning.
- Mechanical ventilation heat recovery has been provided for all units. This impacts internal planning.
- To meet accessibility regulations, layouts of accessible homes have been revised.
- Internal layouts have been revised to meet space standards including compliance with Nationally Described Space Standards and London Borough of Southwark's policies on minimum room and unit sizes.
- The finished floor level of Building C has been raised to Maximum Likely Water Level anticipated in a breach of the River Thames defences.
- It is proposed that 10% the apartments were designed to be M4(3) wheelchair accessible and all other apartments to M4(2).

32. In addition to the above changes, amendments are proposed in relation to the provision of residential amenity facilities in Buildings A, C and D and reduction

in the square meterage of the approved commercial uses as set out below.

| Use Class | Existing sqm | Proposed sqm | Change +/- sqm |
|---|---|---|---|
| Ancillary residential uses (use class C3) Building A (level 0) | 0 | Residents' Lounge 103<br><br>Spa (inc changing) 95<br><br>Swimming Pool 179<br><br>Cinema Room 43<br><br>Fitness suite 46<br><br>Gym 229 | +695 |
| Use Class A/B1 Building B | 150 | 78 | -72 |
| Use Class A/B1 Building C | 127 | 86 | -41 |
| Ancillary residential uses (use class C3) Building C (level 0) | 0 | Resident's amenity 104 | +104 |
| Ancillary residential uses (use class C3) Building D (level 1) | 0 | Resident's amenity 120 | +120 |
| | | | |
| Total Use Class A/B1 | 277 | 164 | -113 |
| Total Ancillary residential uses (use class C3) | 0 | 919sqm | +919 |

33. The net result of the above changes results in amendments to the height, massing, and form including:

- increased ground floor and soffit heights to maintain a consistent soffit level across Buildings A – C while accommodating the change in the ground floor levels of Buildings B & C to accommodate the increased flood risk and also accommodate the functional requirements of the residents amenity within Building A;
- increased lift overrun heights - to reflect the current lift standards, due to the changes in floor to floor heights, and to achieve enhanced thermal performance. However, the lift overruns which are near the

street and those at the main roof level are concealed behind either the parapet height (book ends) or roof plant screens.

- increased balustrade heights for the terraces – as a result of increased terrace build ups to achieve enhanced thermal performance and maintaining a guarding height compliant with Building Regulations .
- increased roof heights as a result of amended energy strategy including ASHP configurations - ASHP units will be located on Buildings A and B and the screens are shown at 3500mm height to accommodate these and their acoustic enclosure.

## Planning history

34. 07/AP/1262 - The erection of six residential buildings providing 587 residential units and 275m² of flexible Class A/B1 floorspace at ground floor level along Chambers Street; 203m² of Class D1 floorspace along Llewellyn Street; basement parking; service and access roads, works of hard and soft landscaping together with other works incidental to the application. Granted 8/10/2010

11/AP/1875 - Application for non-material amendment to planning permission ref 07/AP/1262 to allow details to be discharged in phases related to the construction phases of the overall development. Variation of associated s106 agreement dated 8 October 2010 in relation to construction phases. Approved 6/07/2011

11/AP/3102 - Non-material amendments to Buildings F and G of planning permission dated 08/10/2010 (07-AP-1262) for the erection of six residential buildings providing 587 residential units and 275m² of flexible Class A/B1 floorspace at ground floor level along Chambers Street; 203m² of Class D1 floorspace along Llewellyn Street; basement parking; service and access roads, works of hard and soft landscaping together with other works incidental to the application. Amendments to the scheme:

Removal of basements
Re-organisation of building cores
Consolidation of bin stores in Building F
External entrances to Building F townhouses
Building F townhouse increased from 3 to 4 bedrooms
Entrance screen re-positioned in Building F
Internal re-planning of the 3 bed unit on typical floors
Re-positioning of the facade panels
CHP boiler flues rising to vent at roof level
Balcony depths increased to 100mm
Single entrance to Building G, secondary entrance becomes townhouse entrance
Building G footprint moved away from boundary
Re-positioned location of 1 bed wheelchair unit on typical floors of Building G
Re-organisation of the 4 bed apartment locations on typical floors in Building G
Switch of 1 and 2 bed unit locations in Building G on typical floors
Decrease of Building G townhouse from 4 to 3 bedrooms

External column introduced to Building F
Re-positioning of 3 bed wheelchair ground floor duplex

13/AP/0369 - Proposed deed of variation to the existing S106 agreement of planning permission 07/AP/1262 dated 10 October 2010 (residential development comprising 587 dwellings) to vary the terms of provision of affordable housing so that the 18 x 1-bed and 71 x 2-bed dwellings will be provided at affordable rent (circa 65% of market rent) rather than at target rent as previously permitted. The remaining affordable housing remains as previously proposed (17 x 3 bed and 13 x 4 bed affordable dwellings to be provided at target rent and 49 x 1-bed and 12 x 2-bed dwellings as shared ownership). Approved 8/04/2013

13/AP/2182 - Variation of Condition 34 (approved drawings) of planning permission 11-AP-1875 [related to parent permission 07/AP/1262 which consented the erection of six residential buildings providing 587 residential units and 275 sq. m. of flexible A/B1 floorspace at ground floor level along Chambers Street and 203 sq. m. of Class D1 floorspace along Llewellyn Street] to allow for two additional affordable dwellings to the scheme. Withdrawn 20/10/2013.

13/AP/4266 - Variation of Condition (34) (approved drawings) of planning permission 11/AP/1875 [related to parent permission 07/AP/1262 which consented the erection of six residential buildings providing 587 residential units and 275 sq. m. of flexible A/B1 floorspace at ground floor level along Chambers Street and 203 sq. m. of Class D1 floorspace along Llewellyn Street] to allow for two additional affordable dwellings to the scheme. Approved 06.02.2014[1]

15/AP/3481 - Non-material amendment to planning permission 07-AP-1262 for: 'The erection of six residential buildings providing 587 residential units and 275m² of flexible Class A/B1 floorspace at ground floor level along Chambers Street; 203m² of Class D1 floorspace along Llewellyn Street; basement parking; service and access roads, works of hard and soft landscaping together with other works incidental to the application'. The amendments consist of changes to the basement floor level to accommodate new Thames Tideway Tunnel infrastructure passing through the site. Approved 22/09/2015

TTT: Officers note that there is extensive site history related to the Thames Tideway Tunnel under Southwark Council and the relevant Development Consent Order. The full TTT consent history is not included here in full. However, the following applications are discussed in this report:

24/AP/1176 - Discharge of (Air Management Plan)
Formal application for the Discharge of (Operational Noise) pursuant to Requirement PW14 of Schedule 3 of the Thames Water Utilities Limited (Thames Tideway Tunnel) Order 2014 (the Order) (as amended)(hereafter referred to as The Order) for the works at Chambers Wharf (CHAWF) work site only.

22/AP/2017 - Construction of a new river wall as a flood defence including Inter-tidal terrace with a planting scheme and safety features. Approved 15/11/2022

[1]For the avoidance of doubt, the permission which was issued in relation to 13/AP/4266 is an amendment to the permission attached to 07/AP/1262 as varied by 11/AP/1875.

## Key Issues for Consideration

## Summary of main issues

35. The ability to seek minor material amendments to extant planning permissions is set out within S.73 of the Town and Country Planning Act 1990. Unlike an application for 'non-material changes' (S.96a applications) an application under S.73 results in a new permission being issued, although the time given to implement the permission remains unchanged, and is not extended as a result of any S.73 permission. Whilst a planning authority should take into consideration all relevant matters, including current policies at the point it determines a S.73 application, it must also take into account the scope of the changes being requested, and the status of the permission, in terms of how far construction has progressed.

36. The planning issues relevant to the overall development were set out in full in the officer reports on application 07/AP/1262 dated 1/07/2008, 17/07/2009, and 30/09/2010. The currently proposed amendments relate to:

- Land uses within the development;
- Height, massing, form, and layout;
- Design of residential accommodation and unit mix;
- Energy performance and sustainability;
- Architecture and materiality; and
- Transportation.

37. The principle of redeveloping the Site for mixed-use development has been established through the implemented planning permission that was approved on 8 October 2010 (ref. 07/AP/1262). Therefore, this report provides an assessment of the Proposed Amendments only, in respect of the key planning policy and material considerations and as such it is not considered reasonable or necessary to carry out a comprehensive reassessment of all planning matters. The main issues to be considered in respect of this application are:

- Land use including commercial use;
- Housing including affordable housing, quality of residential accommodation, and mix;
- Quality of residential accommodation - Design, including layout, building heights, fire safety and residential amenity space and child play space;
- Jobs and training specification
- Heritage and townscape considerations and archaeology;
- Landscape and public realm;
- Urban Greening Factor and ecology;
- Daylight, sunlight and overshadowing - Internal performance of proposed scheme;
- Impact of proposed development on amenity of adjoining occupiers and surrounding area;

- Transport and highways;
- Fire safety;
- Energy and sustainability;
- Environmental matters and environmental impact assessment;
- TV, radio and telecoms networks;
- Digital connectivity infrastructure;
- Aviation;
- Planning obligations (S.106 deed of variation);
- Mayoral and borough community infrastructure levy (CIL);
- Consultation responses and community engagement; and
- Community impact and equalities assessment, and human rights.

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

**Legal Context**

39. 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, as discussed further below in the section on planning policy, the development plan comprises the London Plan 2021 and the Southwark Plan 2022. The National Planning Policy Framework (NPPF) (2024) and the existing planning permission for the redevelopment of this site, as detailed above in paragraph 38, are material considerations.

40. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires decision-makers determining planning applications with impacts upon 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 local planning 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.

41. 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**

42. The statutory development plan for the Borough comprises the London Plan 2021 and the Southwark Plan 2022.The National Planning Policy Framework 2024, LPGs, SPDs, SPGs and emerging policies constitute material considerations but are not part of the statutory development plan. The 2010 planning permission and its subsequent amendments are material in the consideration of this s73 application, as described in the above section on planning history. A list of policies, which are relevant to this application are provided in Appendix 2. The policies which are particularly important to the consideration of this s73 application, and the changes from the 2010 permission are highlighted in this report.

**Planning Designations**

43. The application site is within Bermondsey and is subject to the following policy designations:

- NSP15 Site Allocation Chambers Wharf
- Area_Visions : AV.03 Bermondsey
- London View Management Framework Landmark Viewing Corridor (Greenwich Park Wolfe statue to St Paul's Cathedral) – North eastern site corner only
- London View Management Framework Wider Setting Consultation Area (Greenwich Park Wolfe statue to Tower Bridge WSCA)
- London Views Management Framework – Extended background vistas (Primrose Hill summit to St Paul's Cathedral)
- Thames Policy Area
- Archaeological Priority Area
- Hot food takeaway primary and secondary school exclusion zone
- Urban Zone
- Air Quality Management Area
- Partially within The River Thames and tidal tributaries Site of Importance for Nature Conservation
- Partially within National Cycle Network NCN 4
- Flood Zone 3 (flood-map-for-planning.service.gov.uk)

44. The application site is allocated site within the Southwark Plan 2022 (NSP15 Site Allocation Chambers Wharf). The indicative allocation plan for NSP15 is shown below. The site is anticipated to provide a minimum residential capacity of 587 homes. Further, the plans states that redevelopment of the site must:

- Provide a significant number of new homes (C3),
- specifically larger unit sizes; and
- Provide retail, community or leisure uses (as defined in the glossary) or employment (E(g)) uses compatible with residential use; and
- Enhance the Thames Path; and
- Deliver a new community hall (F2(b)) – at least 200m$^2$ .

NSP15 identifies that the site has planning permission to provide six residential buildings with A/B1/D1 uses at ground floor level, approved under planning application 07/AP/1262.

Further, the allocation states Development should continue the River Thames Path along the water frontage, supported by active frontages along the route of the path and that development should encourage new access routes to the River Thames from Chambers Street and create a new high quality space adjacent to the riverfront.

The site allocation includes the below table:

| The site location | |
|---|---|
| Approach to tall buildings | Proposals for tall buildings should be set at least one block back from the river bank. Redevelopment must be sensitive to the Thames Policy Area, where building heights should be lower in close proximity to the River Thames. |
| Impacts Listed Buildings or undesignated heritage assets | The site is proximity of Grade II listed buildings Riverside School, the Old Justice Public House, 33 Bermondsey Wall West and East Lane Stairs. |
| Impacts a Conservation Area | The site lies between St Saviours Dock Conservation Area and Edward III's Rotherhithe Conservation Area. |
| Impacts a distinctive Borough View or London View Management Framework View (LVMF) | The site lies within the river prospect Borough View from Kings Stairs Gardens to Tower Bridge. The site lies within LVMF view 5A.2 - Greenwich Park Wolfe Statue to Tower Bridge and St Paul's Cathedral. |
| Impacts an Archaeological Priority Area | Tier 1 APA designation. The site is located in APA1- North Southwark and Roman Road. Very significant archaeological remains are known from the area. Extensive archaeological investigations over the whole site are taking place in advance of the Thames Tideway Tunnel project. |
| Impacts a Scheduled Ancient Monument | No |
| Is in close proximity to the River Thames | Yes, the site is within the Thames Policy Area. |
| Is in a Town Centre | No |
| Is in an Opportunity Area | No |
| Is in the Central Activity Zone (CAZ) N | No |
| Can provide Low Line walking routes | No |
| Impacts a designated open space | The site is in proximity to Cherry Gardens (Borough Open Land and Site of Importance for Nature Conservation) |

- Site Boundary
- Conservation Area
- Grade I Listed Building
- Grade II Listed Building
- Grade II* Listed Building
- Opportunity for Active Frontages
- Cycleways
- Improved connectivity for pedestrians and cyclis
- Open Spaces
- Buildings of architectural and historic merit
- Buildings of townscape merit
- Locally Significant Industrial Sites
- Strategic Protected Industrial Land
- New Public Open Space

## Assessment

### Land use including commercial use

45. The principle of the Chambers Wharf development was agreed in the 2010 approved permission (07/AP/1262) and subsequent amendment applications. The proposed mix of residential, commercial, leisure and community uses continues to accord in principle with the NPPF, London Plan and Southwark Plan, as set out below for each use in turn.

46. At the heart of the NPPF (2024) is a presumption in favour of sustainable development. The framework sets out a number of key principles, including a focus on driving and supporting sustainable economic development, delivering a sufficient supply of homes, and ensuring the vitality of town centres. The NPPF also states that permission should be granted for proposals unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF as a whole. Since the 2010 permission was granted the development plan has changed with the adoption of the London Plan in 2021 and the Southwark Plan in 2022. The new development plan still supports the principle of brownfield development for different uses, and in particular the principle of the development of this site is set out by Southwark Plan 2022 NSP15 Site Allocation Chambers Wharf as detailed in the above section on planning designations.

47. The London Plan's chapter "Good growth" includes Good Growth objectives GG2 "Making the best use of land", GG4 "Delivering the homes Londoners need" and GG5 "Growing a good economy" which are relevant to the proposal. Objective GG2 seeks to make best use of land and requires proactively exploring the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. Objective GG4 requires those involved in planning to ensure more homes are delivered, good quality homes, and to allocate a range of sites to deliver housing locally, with ambitious build out rates.

48. The Southwark Plan (2022) in its strategic vision, ST1 "Southwark's development targets" aims to achieve targets for 40,035 homes and 58,000 new jobs in the borough between 2019 and 2036, and also targets 76,670sqm net new retail floorspace. These targets feed into the policies SP1 "Homes for all" and SP4 "A green and inclusive economy," and the area visions. The Southwark Plan's area vision AV.03 for Bermondsey states that development should "*provide as many homes as possible while respecting the local character*" and states that "*there may be opportunities for taller buildings on key development sites*". Further, AV.03 supports that development in Bermondsey should '*enhance the environment of Tower Bridge Road as a gateway leading to Tower Bridge'.*

49. As approved, the site benefits from planning permission for the erection of six residential buildings providing 587 residential units and 275m² of flexible Class A/B1 floorspace at ground floor level along Chambers Street; 203m² of Class D1 floorspace along Llewellyn Street; basement parking; service and access roads, works of hard and soft landscaping together with other works incidental to the application. The number of units was later increased to 589 through the approval of two additional affordable homes. As previously set out in this report, the affordable component of the approved scheme has already been delivered on site and the proposals relate only to the private elements of the scheme.

50. The applicant proposes to reduce the number of private residential units on the application site. The principle of residential development is established on

this site, Officers note that the Southwark Plan 2022 Site Allocation for Chambers Wharf (NSP15) anticipates a minimum residential capacity of 587 homes. Although the quantum of residential units will decrease from 589 to 566 units, officers note the preceding quantum was the result of a design which predated the current internal space standards (NDSS) and fire safety regulations, which typically require more space to achieve compliance than the historic standards. Further, officers note that applicant has sought to minimise height and massing changes and associated amenity impacts.

51. Officers note that site allocation NSP15 anticipates the deliver a new community hall (F2(b)) of at least 200m$^2$. The 203m² of Class D1 floorspace along Llewellyn Street is not associated with Blocks A, B, C, and D and this aspect of the development would not be changing as a result of the proposed development.

52. As set out in paragraph 37 above, an additional 919sqm of ancillary residential uses are proposed including spaces to be used for residents' lounge, spa, swimming pool, cinema room, fitness suite, gym, and residents' amenity space and a reduction of 113sqm of commercial use class A/B1 is proposed. This ancillary residential use would be within Use Class C3.,

53. The DAS advises that the reduction in commercial space is a result of space a design of the residential entrances to better front the street. Officers note that fire safety requirements have imposed further facilities such as additional refuge spaces and additional means of escape. While Southwark Plan 2022 NSP15 Site Allocation Chambers Wharf anticipates commercial space, no minimum space requirement or target value is set for commercial space within NSP15 or elsewhere within the development plan. The combined total of approved commercial space in buildings B and C is 277sqm and this would reduce to 164sqm. However, the two units to be provided would still be of a good size with an active frontage onto Chambers Street, representing an attractive offer for future occupiers. The reduction in size of the commercial units allows for a residential access lobby onto Chambers Street. The residential lobbies will also help to activate the street which is welcome.

54. Objections have been received in relation to the proposed reduction in commercial space, particularly in relation to desire for a larger scale grocery store. Officers note that it was never secured by condition or planning obligation that this space would function as a grocery store, and small scale of the approved units would not have provided sufficient space to function as a full sized grocery store and this aspect of the scheme is not changing as a result of the proposed amendments. Due to the size constraints, it was likely the case that these units would have come forward as smaller scale retail and/or hospitality offerings, and this remains the case under the proposed amendments. Accordingly, due the general consistency with the approved scheme and compliance with Site Allocation NSP15, officers consider the proposed reduction in commercial space is acceptable

55. The proposed mix of land uses comply with site allocation NSP15, are in line with the original planning permission, and are therefore considered acceptable, subject to detailed review in the remainder of this report.

56. The applicant has proposed that the commercial units be reclassified as Class E. The permission was granted before the introduction of the Class E use class, which partly replaced and reorganised the Class A, B and D uses. It is correct to continue to refer to the approved Class A, B, D uses in this s73 application.

## Housing including quality of residential accommodation and mix

Housing Quantum

57. As set out in full in the applicant's cover letter, the unit numbers in Buildings A, B, C, and D would decrease from 407 homes to 384 homes, a reduction of 23. This is due to a series of amendments which the applicant indicate are driven by Building Regulations and the requirement to meet current space standards. The approved private amenity space for the units has been reduced from the consented scheme but remains compliant with the London Plan. Since the 2010 permission and subsequent amendments were granted, the policy support for new housing to address the borough's ten-year housing targets in London Plan policy H1 and the Southwark Plan's ST1 development targets has continued. The site allocation for Chambers Wharf NSP15 sets a minimum residential capacity of 587 homes for the site. The current planning permission exceeds this as the quantum of affordable units was increased by two. The proposed reduction of 23 units would fall short of the NSP15 by 21 units.

58. In terms of mix, the proposed amendments reduce the proportion of studio and one bed homes (42% to 37%) and increase the proportion of two-plus bed homes (58% to 63%).

59. The reduction in homes within the market tenure of this development is in response to changes to the regulatory regimes, most significantly, fire safety and energy within the building regulations and to bring the homes in line with the national dwelling size standards. They are also necessary because of restrictions form the TTT and in response to changes in market conditions since the original consent where expectations from buyers has changed. The applicant has advised that the intention of the design is to minimise impacts to neighbouring development and to work within the constraints of the existing scheme as much as possible. Officers consider the rational to meet the relevant space standards while minimising height and massing increases is acceptable justification in principle for the net reduction in units.

Affordable housing

60. The consented scheme features four phases, which as approved provide for the delivery of 589 units (182 affordable (30.9% total comprising a tenure split of 62 intermediate units and 120 socially rented units) and 407 private (69.1%)). The affordable housing is concentrated in Phase 1 (182 affordable housing units) which were completed by St James in 2015.

**Unit Mix**

61. Policy H10 of the London Plan requires schemes to generally consist of a range of unit sizes, taking into account a variety of factors including local evidence, delivering mixed and inclusive neighbourhoods, a range of unit types at different price points, the aim to optimise housing potential on sites, the nature and location of the Site with a higher proportion of smaller units in highly accessible locations close to a town centre or station.

62. The site is within the "urban zone" where Southwark Plan policy P2 requires major residential developments to provide a minimum of 60% of homes with two or more bedrooms, a minimum of 25% family homes with three or more bedrooms, a maximum of 5% studios, and a mix of two-bedroom three person and four person homes. London Plan policy H10 states that schemes should generally consist of a range of unit sizes, with regard to local need, delivering mixed and inclusive neighbourhoods, provide a range of unit types at different price points and range of tenures in a scheme. Further, Southwark Plan 2022 NSP15 Site Allocation Chambers Wharf specifies that the redevelopment of the site must provide for larger unit sizes.

63. Officers note that existing scheme was approved by the Council prior to these requirements being in place and that the existing planning permission has been implemented.

64. A comparison of the impact on unit numbers and habitable rooms in Blocks A, B, C, and D is detailed in the tables below:

| | **Units** | **Hab rooms** |
|---|---|---|
| Consented | 407 | 1272 |
| Proposed | 384 (23 unit reduction) | 1227 (45 room reduction) |

| Habitable rooms | Consented | Proposed | % Change |
|---|---|---|---|
| Building A | 317 | 280 | -11.67% |
| Building B | 447 | 428 | -4.25% |
| Building C | 344 | 367 | 6.69% |
| Building D | 164 | 152 | -7.32% |
| Total | 1272 | 1227 | -3.54% |

65. Approved Scheme – Summary of Blocks A, B, C, and D only

| Private Homes | Block A | Block B | Block C | Block D | Homes Total | % of total | |
|---|---|---|---|---|---|---|---|
| 1-bed/1P (Studio) | 2 | 0 | 0 | 4 | 6 | 1.47% | 42.26% |
| 1-bed/ 1P-2P* | 58 | 58 | 49 | 1 | 166* | 40.79% | |
| 2-bed/3p<br>2-bed/4p | 41 | 56 | 40 | 13 | 150 | 36.86% | 36.86% |
| 3-bed/4p<br>3-bed/5p<br>3-bed/6p | 10 | 26 | 26 | 23 | 85 | 20.88% | 20.88% |
| 4-bed/8p | 0 | 0 | 0 | 0 | 0 | 0% | |
| Total and % of total | 111 | 140 | 115 | 41 | 407 | | |

* Under the current policy guidance,158 of these units would be assessed as 1Bedroom 1person flats as they are less than 50sqm.

Proposed Scheme - Blocks A, B, C, and D only

| Private Homes | Block A | Block B | Block C | Block D | Homes Total | % of total | |
|---|---|---|---|---|---|---|---|
| 1-bed/1P (Studio) | 17 | 14 | 22 | 1 | 54 | 14.06% | 37.24 |
| 1-bed/2P | 17 | 37 | 32 | 3 | 89 | 23.18% | |
| 2-bed/3p | 17 | 25 | 8 | 8 | 58 | 15.10% | 40.1 |
| 2-bed/4p | 24 | 35 | 32 | 5 | 96 | 25.00% | |
| 3-bed/4p | 8 | 0 | 0 | 0 | 8 | 2.08% | 22.66% |
| 3-bed/5p | 0 | 11 | 0 | 12 | 23 | 5.99% | |
| 3-bed/6p | 9 | 13 | 23 | 8 | 53 | 13.80% | |
| 4-bed/8p | 1 | 1 | 1 | 0 | 3 | 0.78% | |
| Total and % of total | 93 | 136 | 118 | 37 | 384 | | |

66. In summary these changes would have the following impacts on the approved mix:

- The approved scheme featured 7 studios and 166 one bedroom flats. If the consented 1 bedroom layouts were assessed under the current NDSS standards, 158 of these units would now be assessed as 1Bedroom 1person units because they are less than 50sqm. In this context, the provision of 54 open plan studio units is not considered a significant departure from the existing development which featured many similar sized units but with partitioned rooms.
- While the number of studio units would increase to 14% (from 6 to 54 units), the overall mix of policy compliant sized 1Bedroom 2Person flats (greater that 50sqm or above) would increase to 89, meaning the outcome would be an improvement over the existing scheme with a net increase in larger 1 bedroom units provided.
- There would be an increase in two bedroom properties and positively the majority of these would be 2 bedroom 4 person flats.
- There would be an increase in the percentage of 3 bedroom and 4 person units from the existing permission which is welcomed.

67. Overall, the percentage of 2-bedrooms or larger has improved from 57.74% of the approved scheme to be 62.75%. This achieves and exceeds the minimum threshold of 60% required by policy P2, and is an improvement over the extant permission. The scheme is short of the 25% 3-bedrooms or larger proportion sought by policy P2, but it increases somewhat from 20.88% to 22.65% which again is an improvement. There in an increase in studio units from 1.4% to slightly over 14%, which exceeds the minimum threshold of 5% studio units set by Policy P2. However, it needs to borne in mind that policy P2 and the minimum space standards which currently apply were not applicable when the scheme was initially designed and to some extent the shortfalls are a result of working within the constraints of the scheme. As demonstrated above, while studios have increased the total provision which would now be counted a 1b-1bedroom flats has been significantly reduced. Further, these changes impact the private elements of the scheme only and

no impact is proposed to the affordable housing provision. Overall, while there is some amendments to the mix including an increase in studio units, the amendments are overall positive in term of providing larger units in general accordance with the aims of policy P2 and Southwark Plan 2022 NSP15 Site Allocation Chambers Wharf in regard to unit mix. Therefore, on balance, officers consider that the scheme is acceptable and generally in accordance with the requirements of London Plan Policy H10 and Southwark Plan Policy P2 and NSP15.

Quality of residential accommodation - Design, including layout, building heights, fire safety

68. As set out above, the outstanding phases in this development comprise blocks A, B, C and D, running west to east across the site, and which have a complex built form. Blocks A, B and C generally form three long 'finger' blocks, set perpendicular to the riverfront, and that cascade in height down onto Chambers Street, albeit the 'fingers' are slightly cranked to optimise views of the river. The blocks are linked at their southern end by lower-rise infill blocks that help frame the streetscape but are raised to create entryways at ground floor level. Block D is located at the end of the run and is primarily a tower with a low-rise tail that aligns with Loftie Street.

69. In the extant scheme, private communal residential gardens are located to the west of block a and between blocks B and C. New public realm was approved between blocks C and D, providing access from Bevington/ Loftie Street through to the new riverwalk at the front of the site and onwards through to Bermondsey Wall West. These aspects are largely unchanged in the amended proposals.

70. In the extant scheme, link blocks between blocks A, B and C notably help frame the streetscape within Chambers Street and are raised above ground floor, allowing covered access to the buildings' main residential entrances, as well as providing public views of the intervening private communal gardens and glimpses through to the riverwalk beyond. Commercial uses are provided at ground floor level at the base of buildings B and C, with shop windows onto Chambers Street and their entrances positioned to the sides beneath the links. Lastly, a vehicle entrance is located in the gap between block A and neighbouring Axis Court building, accessing a ramp to the development's basement carpark. This configuration with the link blocks, and the ground floor commercial uses and basement access is largely unchanged in the amended proposals.

**Layout and planform**

71. In terms of the proposed amendments, the site layout and general plan form have not been altered, maintaining the scheme's high quality of urban design. The development retains it well-connected, permeable layout that reinforce Chambers Street as the main east-west public and vehicular route and offers pedestrian connections and an extension to the wider public realm, including the riverside walk. Furthermore, the visual permeability of the designs is maintained, with the views of the private gardens adding glimpses of greenery and visual amenity to the streetscape and riverside walk. The commercial

uses continue to activate and animate the street scene, enhanced by the provision of new picture windows onto the new communal leisure facilities provided at ground floor within Block A, as well as those of the residential amenity lounges within blocks A and C onto the riverside walk at the 'rear'.

72. Other ground floor changes include the slight raising of the ground floor threshold towards the rear of the site and the replacement of gardens with slightly raised balconies for those apartments located at ground floor level. The adjustment is to address fixed floor level in relation to flood requirements in part, but also revisions to the building envelope, as discussed below. Importantly, the individual entrances to the flats and duplex apartments within block D are retained, maintaining their direct engagement with the public realm. Overall, the changes to the planform at ground floor level represent a slight improvement compared to the consented scheme, with a more animated building frontages and more rational layout of the residential and commercial entrances.

**Height and Massing**

73. The applicant has raised that some plans in the approved scheme did not correctly show the required roof plant on the development. In addition to this, changes related to modern servicing, increases floor levels related to flood protection, and increased floor to ceiling heights have resulted in the building parapet and rooftop plant enclosures extending the maximum heights of the consented buildings. These changes are related to meeting emerging fire safety guidance, meeting current internal spaces standards, changes related to energy performance, and providing compliant amenity spaces.

74. The significant change is to the detailed scale (height and massing) of what are already large and tall buildings, with all four consented buildings exceeding the 30m LBS policy threshold for tall buildings, as well as the 25m GLA/HE threshold for riverside tall buildings. The consented buildings are 34.5m (block A), 43.5m (block B), 40.5m (block C) and 49.0m (block D). While the changes have increased the heights of all blocks, the majority of the increase is noticeable at the plant level and the changes to the parapet heights are minimal. With the rooftop plant added, the full increase in height to Buildings A, B, C, and D ranges from to c3.79-c5m as shown in the table and figures below. Additionally, the massing of some buildings have increased, as shown in the figures below. Internally the development has sought to retain the consented floor-to-ceiling heights for the apartments at 2.5m, meeting the council's residential standard.

| Maximum Height change at top of plant AOD | Consented | Proposed | Change |
|---|---|---|---|
| Building A | 34.5m | 39.2m | 4.7m |
| Building B | 43.5m | 48.28m | 4.78m |
| Building C | 40.5m | 44.42m | 3.92m |
| Building D | 49m | 53.41m | 4.41m |

*Comparison of Consented (Blue) and Proposed (Red) massing and height*

*Buidling A*

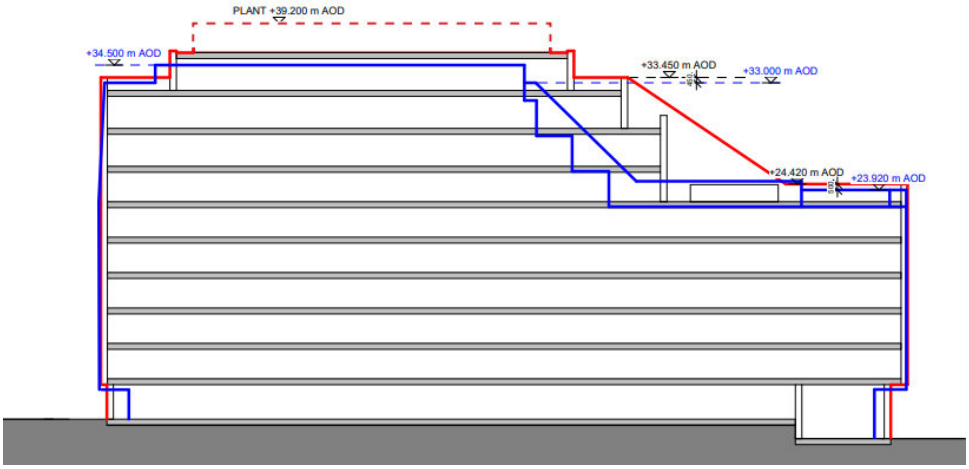



*Figure 13 Height and massing increases Building A*

*Buidling B*

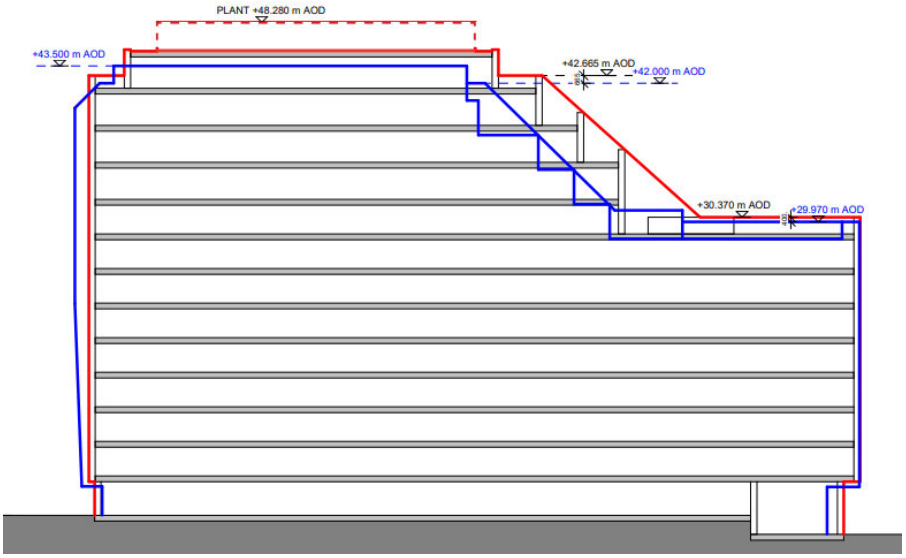



*Figure 14 Height and massing increases Building B*

*Building C*

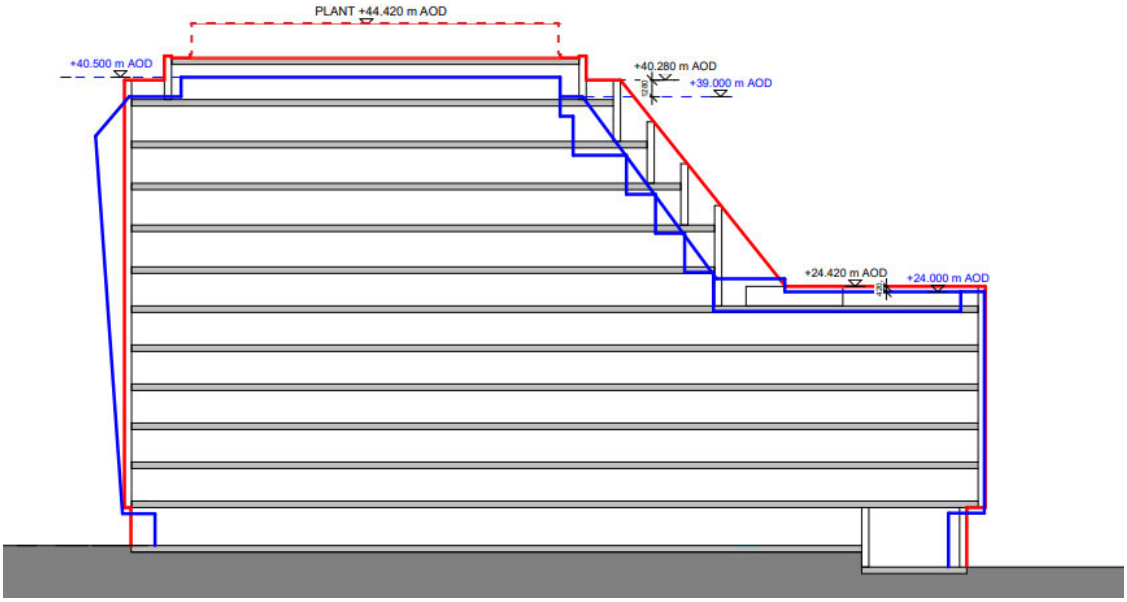



*Figure 15 Height and massing increases Building C*

*Building D*

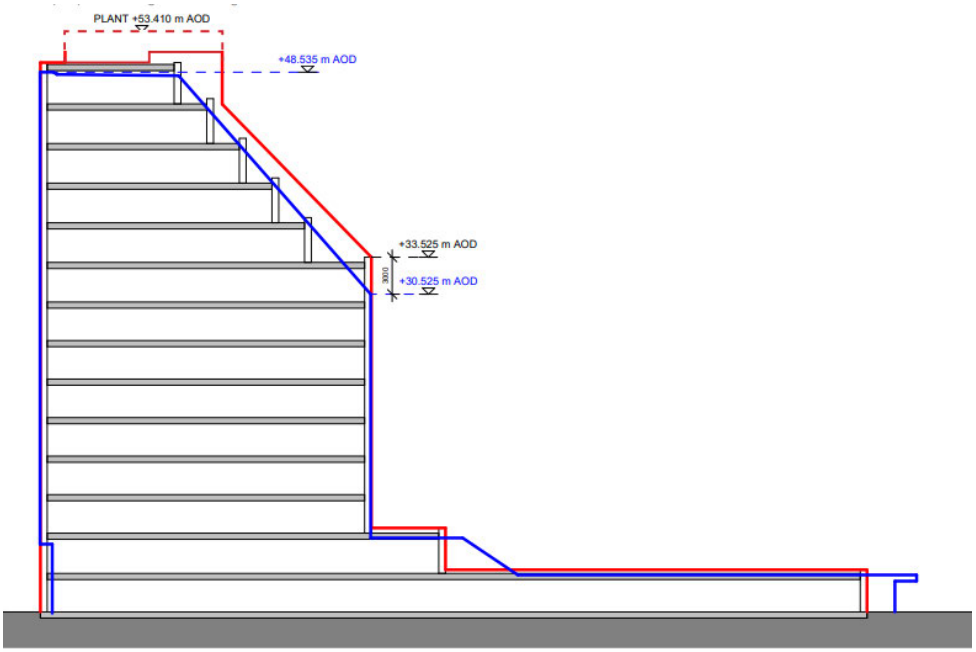



*Figure 16 Height and massing increases Building D*

75. In terms of the detailed changes, the proposals slightly increase the ground floor height to incorporate improved ceiling heights both for the communal residential facilities and commercial units. As stated earlier, blocks C and D have also been raised slightly to ensure the ground floor flats comply with the Environment Agency's flooding standards. Ceiling voids have also been increased slightly to allow for new services, with the provision of additional pipework serving a new sprinkler system and the use of air source heat pumps. As a result, each building has increased in height above the original design scheme. The maximum heights are taken from the added plant and required screening, however the changes to the formed building height are below this and the plant is inset form the roof edges which mitigates visual impacts of these additions. Given the scale of the existing development the

changes represents a relatively modest increase in height.

76. In terms of the detailed changes, the proposals slightly increase the ground floor height to incorporate improved ceiling heights both for the communal residential facilities and commercial units. As stated earlier, blocks C and D have also been raised slightly to ensure the ground floor flats comply with the Environment Agency's flooding standards. Ceiling voids have also been increased slightly to allow for new services, with the provision of additional pipework serving a new sprinkler system and the use of air source heat pumps. As a result, each building has increased in height above the original design scheme. The maximum heights are taken from the added plant and required screening, however the changes to the formed building height are below this and the plant is inset form the roof edges which mitigates visual impacts of these additions. Given the scale of the existing development the changes represents a relatively modest increase in height.

77. While the addition of the plant increases some buildings by the equivalent of another storey in some cases, as shown in figure 1-4 above, this is somewhat mitigated by the siting and scale of plant, which are set back from the roof parapet boundaries and in most cases the plant does not occupy the full extent of the roof as shown in the figures below.

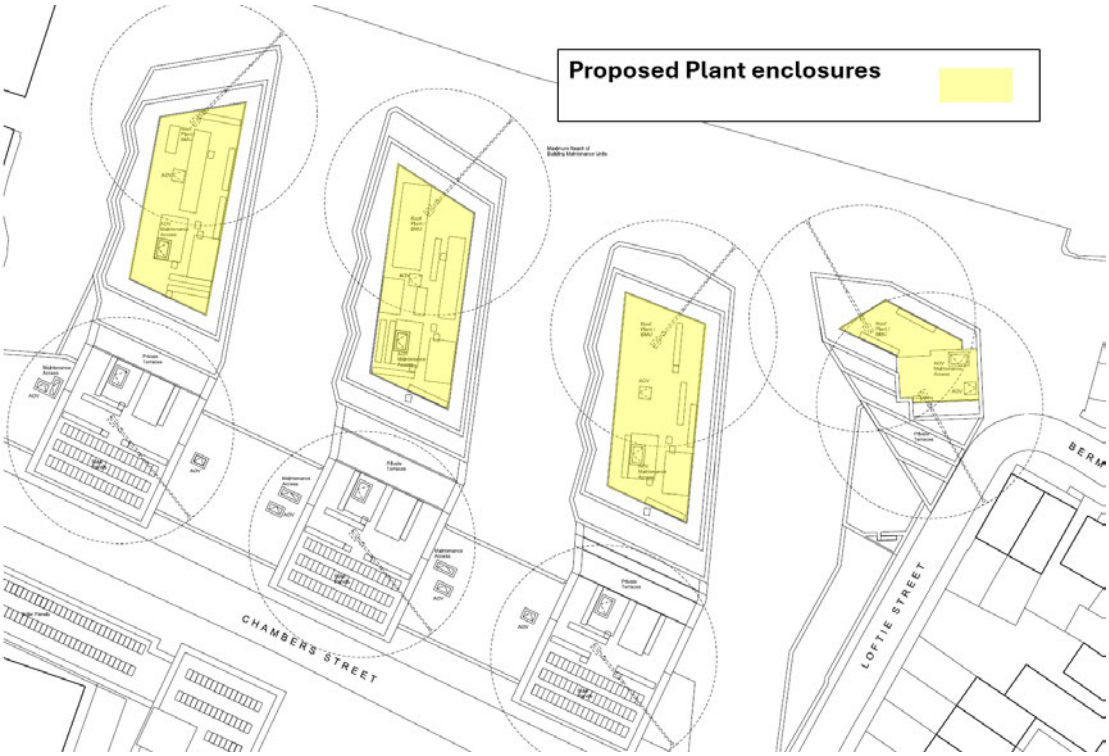



*Figure 17Plant enclosures as shown on proposed plan 115 P8*

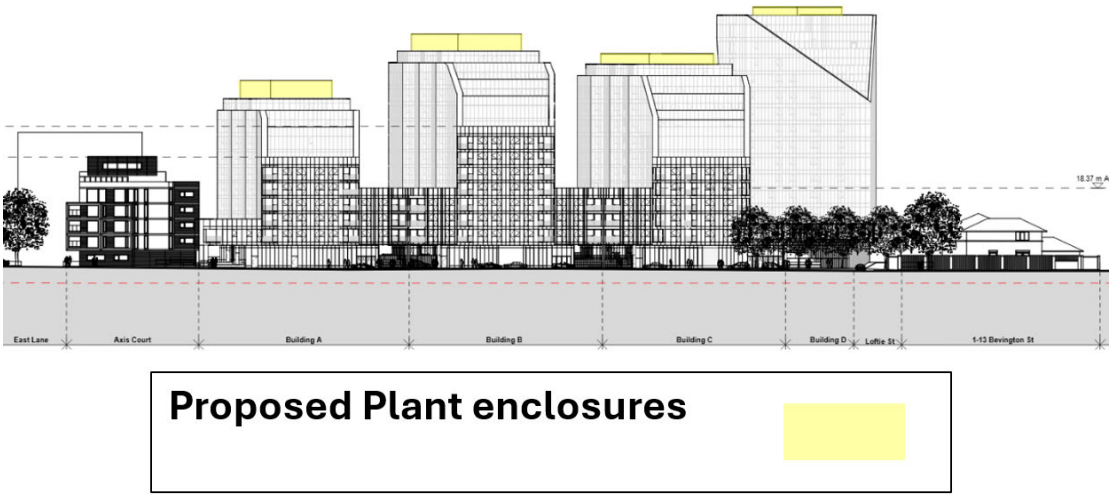



*Figure 18 Plant enclosures as shown on proposed plan 031 P6*

78. Additional massing is incorporated at high level towards the mid sections of the buildings where they cascade in height to the south down to 6-storeys. In this instance, the flats are extended to incorporate part of the current balcony spaces, with the balconies extended southward to make up the shortfall. The extended massing is at high level and it is important that it would not significantly impact the general townscape when viewed from street level, particularly onto Chambers Street where a general consistency with the heights of nearby development is maintained at the interface with the street, as shown in the example of Building A in figure 19 and 20 below. Overall, the relationship to the south of the site with Chambers Street in terms of height, massing, and layout remain largely unchanged from the existing planning permission. While the maximum additions to height of the added plant range from increase of m to these are inset from the roof edge, and the additions to formed height of the shoulder are minimal in most cases.

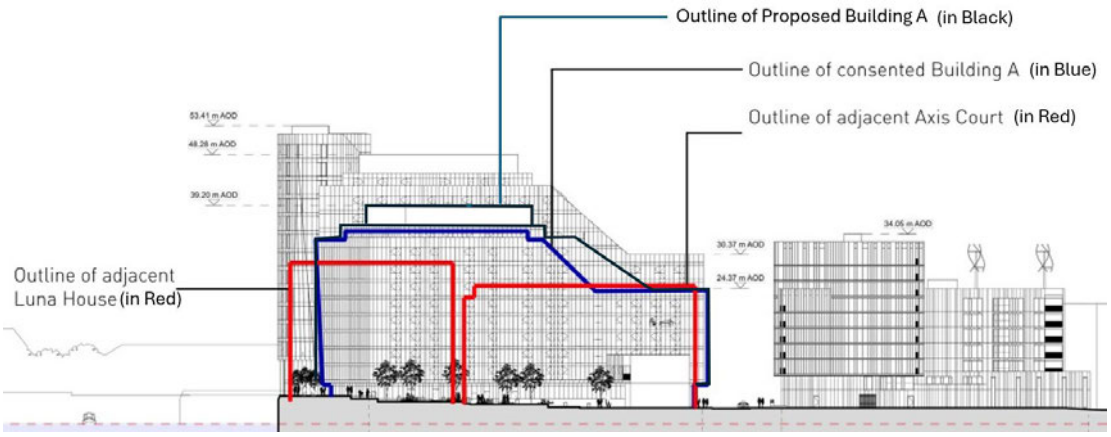



*Figure 19 Building A height and massing comparison*

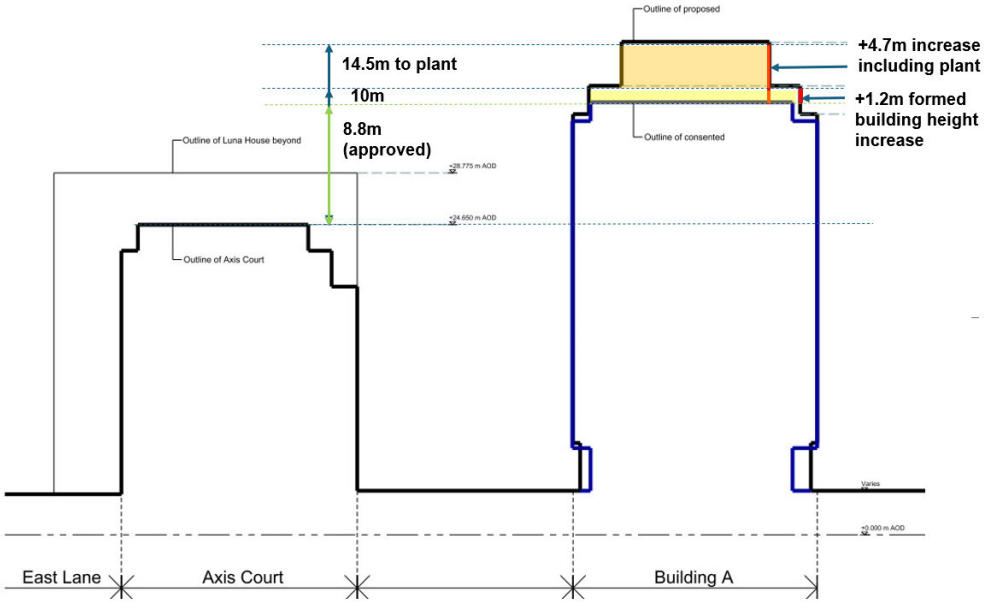



*Figure 20 Building Maximum height comparison of building A to Axis Court*

79. The proposed footprints of the finger blocks have been amended with the buildings widening slightly and the façade lines adjusting, mainly to accommodate the introduction of the second staircase to comply with the new fire safety requirements, but also a higher fire rated façade build up without greater reduction in the quantum of residential accommodation. The increase in footprint is relatively modest, given the scale of the building and has been minimised by partly infilling the winter gardens. In addition, the commitment to the serrated floor plate remains, with a dynamic façade design retained on the west façade of each building, albeit the detailed form has been adjusted to work with the internal layouts.

80. In addition, the ground floor plan is regularised around the building entrance foyer, which is brought forward and squared off towards the street. The simplification is sensible and makes for a better relationship with the street.

81. Overall, the changes in scale (height and massing) and layout are relatively modest and remain considerate of the architecture and the amenity within the new development. The wider townscape and amenity implications remain an important factor. In terms of the submitted Twonscape Heritage Visual Impact Assessment views, the overall building profiles remain similar to the consented scheme. The additional height and massing have a marginal impact on local views, generally remaining as comfortably scaled with the context as the parent scheme. Importantly, the additional bulk at the ‘rear’ does not unduly impact on the streetscape within Chambers Street, which retains its moderate scale and coherent enclosure. There is an additional element of rooftop visible in views from Loftie Street and Bevington Street, although as shown above in figures 7-12, the changes in massing are largely not perceptible considering the overall scale of the building and particularly officers note that the added rooftop plant is not readily visible in these verified views.

*Elevational designs and material palette*

82. At upper floor level, the vertical language of glass and metalwork panelling remains, and textured metalwork is utilised to achieve a sense of depth, visual interest and texture. The omission of the slightly slanted façade design for the north elevation is not considered problematic, its visual contribution is compensated by the visual interest created elsewhere, including through variations in the main façade lines. Lastly, the profiled infill panels for the bridge links between the buildings within Chambers Wharf work well achieve an interface with Chambers Street which is similar to the design of the approved scheme.

83. Overall, the proposed design amendments are relatively modest in scale and do not add harmful height and bulk to the development or appear overbearing within the local townscape. This is confirmed by the updated of local verified views in the EIA compliance note which are copied above as figures 7-12. The elevational architecture retains its engaging quasi-industrial character, which largely maintains the envisioned high design quality and final details of materials would be secured by condition.

Space Standards

84. In terms of the existing scheme, the DAS confirms that all the consented studios, 1 beds and majority of 2 beds, of 68% of the approved units, fall below the minimum unit area of the nationally designed space standards and additionally the majority feature no built in storage, insufficient wall thicknesses for modern building regulations and thermal envelope requirements. and some external amenity spaces which do not comply with current London Plan minimum dimension requirements.

85. In contrast, the revised scheme has been amended to comply with the Nationally Described Space Standards as required by London Plan Policy D6 and Southwark Plans design polices, building regulations, enhanced thermal and acoustic performance, and policy compliant private amenity spaces. The majority of the units meet or exceed the minimum internal unit sizes, with some minor shortfalls. The proposed wheelchair units achieve the larger minimum internal sizes set out in table 4 of Southwark Plan policy P8. The great majority of the rooms achieve or exceed the suggested room sizes in the guidance within the council's Residential Design Standards SPD. Ceiling heights are proposed to be a minimum of 2.5m and each unit would be served by at least two lifts, and have two fire escape cores.

86. London Plan Policy D5 states that development proposals should achieve the highest standards of accessible and inclusive design. The key access principles of the amended scheme are inclusive, secure and provide step free with accessible routes to all public areas and the avoidance of barriers to anyone with disabilities or impaired mobility. London Plan Policy D7 requires residential development to ensure that at least 10 per cent of dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings' and all other dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings. Southwark Plan Policy P8 and London Plan Policy D7 requires developments to provide at least 10% provision of wheelchair accessible homes Part M4(3), with the remainder achieving Part M(4)2 (calculated by habitable room).

87. In terms of accessible units, the existing scheme features 10% wheelchair accessible units. However, a number of the approved wheelchair units were 1 bedroom apartments and the Building Regulations Part M and the London Borough of Southwark's Residential Design Standards could not be achieved.

88. In the revised scheme, 10% (38) of the apartments were designed to be M4(3) wheelchair accessible and all other apartments to M4(2) and are provided across buildings A, B, C, and D with the below mix:
19 1Bed-2Person units
2 2Bed-3Person units
5 2Bed-4Person units, and
12 3Bed-6Person units.
The delivery of these units in accordance with Part M4(3) and the remainder achieving Part M(4)2. This would provide homes for wheelchair users compliant with modern standards and is a notable benefit of the amendments

## Private amenity space

89. As part of enhancing the quality of the scheme it is proposed to replace some of the winter gardens with balconies and to provide all units with private amenity space. This is a welcome improvement on the extant scheme and is overall considered acceptable.

90. Policy P15 of Southwark's Local Plan requires flatted developments to provide 10sqm of private amenity space per unit alongside the provision of 50sqm of communal amenity space per block. Where there is a shortfall in the 10sqm provision, this should be added to the communal amenity space. There are some shortfalls with the minimum private amenity space provision which overall add up to a shortfall of 1,412sqm. To offset these shortfalls, the applicant proposes to provide 2,086sqm of external community amenity space for Blocks A, B, C, and D.

*Aspect and outlook*

91. Southwark Plan policy P15 in part 2.8 seeks development to be predominantly dual aspect and allow for natural cross ventilation. London Plan policy D6 part C states "*Housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirement of Part B in Policy D3 Optimising site capacity through the design-led approach than a dual aspect dwelling, and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating".*

92. The submitted accommodation schedule demonstrates that Buildings A, B, and C feature a mix of single and dual aspect units. Building D is the exception and features primarily dual and triple aspect units. The aspect and outlook of the homes follows that which has already been approved and implemented. Officers note that, as discussed further below, the amendments have resulted in improved sunlight and daylight conditions for the proposed

units. Offices consider that the scheme is acceptable in term of outlook and privacy as the orientation, layout, and separation distances remain largely consistent with the approved scheme which is established. The proposed amends are would overall provide better quality of accommodation or future residents through compliance with current space standards, improvements to sunlight and daylight and importantly, compliant wheelchair accessible homes, the amendments are acceptable in regard to Policy P15 of the Southwark Plan and Policies D3 and D6 of the London Plan.

*Internal noise and vibration levels*

93. The largest change from a noise and vibration perspective is the addition of the new residential amenity facilities, which include gym and swimming use which have the potential to cause noise and vibration emissions from users and associated plant equipment, and the proposed transition to air source heat pumps, which have potential implication for noise generation if not appropriately mitigated. The proposed amendments have been reviewed by the Council's Environmental Protection Team who have recommended conditions to manage potential impacts to residents of the proposed development along with neighbours.

94. For the above reasons, the proposed amendments will mean that the Site continues to deliver a range of high-quality dwellings achieving high standards of residential quality and amenity, which are generally compliant with the London Plan 2021 and Southwark Plan 2022.

Residential Amenity Space and Child Play Space

95. London Plan Policy D6 requires residential developments to provide public, communal and private open spaces. Southwark Local Plan Policy P15 states that development should provide private amenity space, communal amenity space and facilities for all residents, and child play space on site.

96. The residential units will continue to benefit from private amenity space in the form of balconies, as well as a sqm of amenity space for residents' use.

97. Southwark Plan Policy P15 also requires developments to provide child play space in line with the London Plan requirements, calculated by GLA child yield calculator. The child yield 78 and the GLA requirements and play space proposals are set out below:

| Child Age | Space Required | Proposed play provision |
|---|---|---|
| 0-5 | 39.8 | 100sqm (associated with Block A) |
| 5-11 | 27.0 | 370sqm (to be confirmed through submission of detailed) |
| 12+ | 722.5 | |
| Total | 789.3sqm | 470sqm |
| Shortfall | 319sqm | |

Calculated on GLA Play Space Calculator

98. Play space for the amended scheme has been designed in consideration of the approved scheme and the constrains it presents. Although the proposal will fall short of the GLA standards, the proposal will exceed the existing quantum of approved play space by 370sqm and while it cannot be counted as play space the scheme will provide outdoor community amenity space and an increased provision of internal residential amenity space including a pool. For the under 5s, 100sqm of doorstep play provision is accommodated within the outdoor amenity space for Building A, as per the approved scheme. For under 12s, 370sqm of play area will be provided within the scheme landscaping with a location to be determined once the landscape plans are submitted for discharge. A further condition related to play is recommended to ensure the play provision will be designed and delivered to a high-quality standard.

99. The consented scheme proposed 100sqm provision of doorstop play space alongside a £100,000 contribution as required in the S106 agreement which the applicant advises was made upon implementation of the Phase1 element and was to be used for improvements to facilities in the local area such as 11 Kings Stairs Gardens, Southwark Park and George Row Playground which are all within walking distance of the Site. The s106 agreement includes a plan that identifies where the playspace was to be provided and the intention remains that the full 100sqm of playspace in this location will be provided in the revised scheme and an additional 370sqm will be secured for the 0-11yr age group.

100. Overall, the Proposed Development provides a balanced mix of private and communal amenity space, as well as play space that is focussed towards meeting the needs of younger age groups on-site. The scheme's amenity and play space will be maximised wherever feasible as part of the amendments and anticipated submission of landscaping and play space details.

Jobs and training specification

101. An employment contribution of £265,197.50 was secured as part of the existing planning permission. It is proposed that the commitments in the existing s106 are retained as part of the amended proposal. This is in line with the aspirations of Southwark Plan Policy P28.

## Heritage and townscape considerations and archaeology

102. The principle of tall buildings on the site has been established through the permitted scheme and current site allocation within the Southwark Plan 2022. The new buildings are taller than their surroundings, although it has been demonstrated through the original consent that this approach is sensitive to the character and appearance of the Conservation Area and commensurate with the river front location of the Site.

103. Changes to the height and massing since the permission have been sensitively considered, to ensure that the general layout and form of the existing scheme are maintained. The new massing follows the same

principles as the permitted scheme, with greater height focused toward the river frontage which steps down to the south where the Buildings meet Chambers Street. Details of the amendments to the massing can be found in Section 3.4 of the DAS.

104. The submitted Note on the Environmental Impact Assessment, prepared by Trium, assesses the impacts of the amendments on Townscape, Visual and Built Heritage and is supported by a study of verified views which compares the consented development with the development including the proposed amendments, as well as the impact upon character and function of the area. Overall, the compliance note concludes that the effects presented in the Consented ES remain valid in respect of townscape, visual and heritage considerations.

105. The legislative and planning policy context for consideration of effects on heritage are principally set out in the Planning (Listed Building and Conservation Areas) Act 1990 (Sections 66 and 72), the NPPF (Chapter 16 in particular) and PPG, the London Plan (Chapter 7) and Southwark Plan (P19, P20, P21 and P26 in this case).

106. Paragraph 207 of the NPPF states that when determining applications, local planning authorities (LPAs) should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. This level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

107. Paragraph 212 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

108. Paragraph 213 sets out that any harm to the significance of a designated heritage asset, including from development within its setting, should require clear and convincing justification. Paragraph 215 adds that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.

109. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the general duties of Local Planning Authorities in regard to development which affects a listed building or its setting. Section 66 states " *In considering whether to grant planning permission [F1or permission in principle] for development which affects a listed building or its setting, the local planning authority … shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses*."

110. London Plan Policy HC1 (Heritage conservation and growth) requires proposals affecting heritage assets to demonstrate a clear understanding of

the historic environment and integrate this understanding into the planning and design process. Proposals should respect and conserve the significance of heritage assets and their settings, actively managing cumulative impacts. Proposals must also identify archaeological assets, avoid or minimize harm, and integrate heritage considerations early in the design process to deliver positive benefits.

111. Southwark Policy P21 (Conservation of the historic environment and natural heritage) requires proposals to conserve and enhance the significance of designated and non-designated heritage assets and their settings.

112. The site is not within a conservation area, and there are no listed buildings within it. It is situated within the wider setting of conservation areas and lies between St Saviours Dock Conservation Area and Edward III's Rotherhithe Conservation Area. Accordingly has the potential to indirectly impact the setting of these conservation areas and designated and non-designated heritage assets. The site is not considered to impact a Scheduled Ancient Monument. The impacts on the setting of these areas and structures have been grouped into townscape groups for ease of reference.
Conservation Areas:

- Adjacent to Edward III's Rotherhithe – Adjacent to the east
- Adjacent to St Saviours Dock – Approximately 35m to west
- Wilson Grove – Approximately 80m to east

The following adjacent heritage assets that have been identified:

- Grade I Listed Structure Tower Bridge – Approximately 700m to the west,
- Tower of London World Heritage Site,
- Grade II listed Riverside School,
- the Old Justice Public House, and
- 33 Bermondsey Wall West and East Lane Stairs.

The site lies within the:

- LVMF view 5A.2 - Greenwich Park Wolfe Statue to Tower Bridge and St Paul's Cathedral;
- river prospect Borough View from Kings Stairs Gardens to Tower Bridge; and
- LVMF view 4A.1 - background vista of the view from Primrose Hill to St Paul's Cathedral.

## Heritage Implications

113. In terms of the historic services environment, the site is outside of a conservation area and does not include any listed buildings. There are, however, several Grade II listed buildings nearby, including the former warehouse and granary at no.29 and no.33 Bermondsey Wall West, and workshop at no.67 George Row. The site is also close to three conservation areas, with the boundary of St Saviours Dock conservation area located in East Lane, some 30m to the west; the Edward III's Rotherhithe conservation area almost abutting its riverfront to the immediate east, as bordering at the junction of Farncombe Street/Bermondsey Wall West, some 60m to the east;

and the Wilson Grove conservation area, some 100m to the southeast. The site can also be seen from the Tower of London and Tower Bridge and is within the borough's protected panoramic view from King Stairs. It also falls within its strategic views from Greenwich Park and Blackheath Point.

114. The settings of the Grade II listed buildings have greatly changed in this area with much of the rivers that riverfront area being rebuilt. The development is seen as part of a variety of built forms and architecture in this location and, although large, would not impose on their settings as to appear unduly disruptive

115. In terms of the conservation areas, although the townscape is generally low or mid-rise, the streets generally do not align with the site, reducing its visibility from within the conservation areas. Where the development is seen between buildings or above the roofline, it is not read as especially disruptive. Historically, the backdrop to the streets and conservation areas would have been a scene of large commercial riverside wharfs and industrial buildings.

116. The intervening distance is too great to unduly detract from the settings of the Tower Bridge of the Tower of London; while the development itself would read as an engaging full-stop to the larger scaled riverfront developments along the south bank when viewed from upstream, switching to the more domestic scale of Rotherhithe and Surrey Quays riverfront beyond. The scheme is very evident in the view from King Stairs, but is read more as an engaging riverfront development that would not distract from an appreciation of the broad sweep the river, with Tower Bridge in the distance.

117. The development is visible in the LVMF view from Blackheath Point. Phase 1 is directly in line with St Paul's, but remains below the threshold height, preserving the appearance of the base of the dome. The later phase(s) would be seen stepping to the right, but would remain sufficiently low-key in their appearance not to be unduly disruptive. Lastly, in terms of the view from Greenwich Park, the development would appear within the wider consultation zone to the LVMF view and, although close, would not interfere with the view of St Paul's itself, preserving the view.

118. Overall, despite the revisions to the heights and detailed appearance of the later phase(s) of the masterplan scheme, the development would sufficiently preserve the settings of nearby listed buildings and conservation areas, and would not unduly affect the settings of the Tower of London and Tower Bridge, and the protected borough and strategic views, including those of St Paul's. As such, the development would comply with Southwark Plan's heritage policies.

## Heritage conclusion

119. The site does not include any designated heritage assets or fall within any conservation areas and accordingly. Therefore, the proposal will result in no direct harm to identified heritage assets or conservation areas.

120. In terms of indirect impacts to heritage setting, the ES compliance note and heritage assessment note indicates that current findings are largely similar to

preceding 2007 ES findings including in regard to the operational phase impacts on built heritage. The Council's conservation officer has reviewed the submission documents and has concluded that despite the exceedance of the LVMF view 5A.2 height limits, any visual harm resulting from the proposed development would not be significant, if at all, to protected views. The conservation officer considers that any impact to the LVMF would be readily mitigated by the siting of the development to the edge of the LVMF view 5A.2 view where it would appear in long range views as part of the existing cluster of tall buildings at the edge of the LVMF view 5A.2 in a similar manner as the extant scheme. Similarly, in terms of visual impacts to the settings of the identified conservation areas and heritage assets, the Council's conservation officer has reviewed the submission documents and has concluded that any visual harm resulting from the proposed development would not be significant, subject to the recommendation of conditions of consent securing the delivery in accordance with the approved plans and subject to a review of final materials. Historic England have confirmed that they do not wish to comment on the applicant and are content for this to be assessed by the council's design and conservation experts.

121. Officers are of the view that the Proposed Amendments are minor in nature and would continue to result in no harm to the significance of the relevant heritage assets. Where there is any potential harm, including in relation to the LVMF view 5A.2, Officers consider it would be less than substantial harm and that it would be readily outweighed by the benefits of the proposal, including brining forwards new housing on this site, in accordance with the aspiration of the Southwark Plan 2022 set out in by Site Allocation NSP15, which is compliant with current fire safety and internal space requirements. Accordingly, officers consider the amendments are consistent with the approved heritage impacts and that any potential heritage harm arising from the proposed amendments would be less than substantial and readily outweighed by the anticipated benefits of the scheme and acceptable on balance in terms of Paragraph 215 and 221of the NPPF.

122. Subject to conditions, the Proposed Amendments would comply with national and local planning policies on design and the historic environment, including London Plan Policy HC1, and LB Southwark's policies P20 (Conservation Areas) and P21 (Conservation of the Historic Environment and Natural Heritage). The amendments are also in compliance with the relevant provisions outlined in Chapter 16 of the NPPF (Conserving and enhancing the historic environment), paragraphs 207, 212, 213, 215, and 221. The impact of the proposals on the special interest of the listed buildings and the conservation area will be beneficial and the statutory duties set out in Sections 66(1) and 72(1) are met and the proposals are compliant with the development plan policies.

## Archaeology

123. London Plan Policy HC1 part d identifies that "development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation".

124. Policy P23 of the Southwark Plan further states that development must

conserve the archaeological resources commensurate to its significance, and where archaeological remains cannot be preserved in situ the remains must be excavated, recorded, archived, published, interpreted and displayed through a detailed planned programme of works.

125. The application site falls within an Archaeological Priority Area and conditions related to archaeology were placed on the existing consent. As noted above, since the original scheme was consented, the site has been utilised as a construction site for the delivery of the TTT development. The applicant notes that as part of the TTT development extensive archaeological excavation has been undertaken on the Site. As a result of the significant work that have already been completed on the application site, the applicant has requested that the current archaeology conditions be removed from any further permission for the application site.

126. The applicant has requested that the existing archelogy condition attached to the 2014 permission (conditions 2 Building Recording, 3 Archaeology Mitigation Strategy, 4 Archaeological Work – River Wall/Deck, and 5 Archaeological Reporting) be removed from any forthcoming decision given the TTT works onsite are also subject to archaeological requirements.

127. The council's Archaeology specialist has reviewed the proposal and consider updated conditions are necessary in light of changes to the Development and discoveries onsite during the TTT works. Specifically, the specialist has requested updated conditions in relation to Archaeological Evaluation, Archaeological Mitigation, Archaeological Pre-commencement Foundation and Basement Design, Archaeological Reporting, and Archaeological Public Engagement Programme. Further, the archeologically specialist has requested section 106 planning obligations to support Southwark Council's effective monitoring of archaeological matters, which planning officer have confirmed should be £11,171 in line with the Council's planning obligations SPD. These provisions are included in the recommended conditions and heads of terms.

128. Overall, in archaeological terms, subject to the recommended conditions and obligations officers consider that the proposals will comply with local and national policy and that the development will be in accordance with the originally approved application.

## Landscape and public realm

129. London Plan Policy D8 states that development proposals should encourage and explore opportunities to create new public realm, which is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain. Southwark Local Plan Policy P13 states that development must ensure a high-quality public realm that encourages walking and cycling and is safe, legible, and attractive, and eases the movement of pedestrians, cyclists, pushchairs, wheelchairs and mobility scooters and vehicular traffic. Development should also provide landscaping which is appropriate to the context, including the provision and retention of street trees. Policy P25 of the Southwark Plan requires that development within the Thames Policy Area establish or

continue the River Thames Path along the water frontage and it promotes protection of biodiverse where new moorings are proposed.

130. It is proposed to amend the landscape strategy to address constraints imposed by the Thames Tideway Tunnel and to better respond to the amended design and layout of the buildings. Further, amendments are proposed in relation to accommodating the updated access ramp for the car park. Notwithstanding these amendments, the landscape proposal remains largely as was initially approved and it is noted that relevant landscaping conditions are attached to the extant permission which have not been discharged at this stage, as shown in the figures below. The original proposal to maintain public realm along the river frontage would not change with pedestrian links maintained between Axis Court and Luna House adjacent to Block A, to the north of Luna House, between Blocks C and D, and adjacent to the east of Block D. Similarly, the scheme continues to feature private communal amenity spaces adjacent to Buildings A, B, and C for the use of residents of these blocks as is the case in the extant planning permission.

*Figure 21 Current landscape plan with public realm and access (with TTT infrastructure added in red)*

*Figure 22 Access strategy considered under 07/AP/1262*

131. In response to requests of local residents and Ward Councillors, the applicant has agreed to improvements to the proposed landscaping along Chambers Street in the form of additional tree planting, with 5 additional trees planted along Chambers Street. Further, the applicant has agreed to improve the landscape design to achieve a policy compliant Urban Greening Factor (UGF) of 0.4 despite this requirement not applying to the extant planning permission. These improvements would be secured by recommended conditions of consent related to landscaping. Accordingly, due to the minimal nature of the changes from the approved plans and the agreed improvements, Officers raise no object to the landscape amendments and consider that final landscape details will be submitted through discharge of conditions in accordance with the extant permission.

## Urban Greening Factor and ecology

132. London Plan Policy G5 suggests an Urban Greening Factor target score of 0.4 for predominantly residential development developments, whilst Southwark Plan Policy P60 states that development must contribute to net gains in biodiversity. Further, P60 seeks to enhance populations of protected species and increase biodiversity net gains by requiring developments to include features such as green and brown roofs, green walls, soft landscaping and nest boxes.

133. As explained in the preceding section, the landscape proposal remains largely as was initially approved and it is noted that relevant landscaping conditions are attached to the extant permission which have not been discharged at this stage. The historic buildings on the site are demolished and the site is currently in use for the delivery of the TTT development. The application site is adjacent to the River Thames and tidal tributaries Site of Importance for

Nature Conservation (SINC). The extant permission features a UGF of .29 and no substantive amendment are proposed to the landscaping. The development is not subject to Biodiversity Net Gain requirements, however the applicant has submitted an ecological assessment, prepared by Ecology Solution, which assess BNG and confirms that a BNG of over 10% would be achieved.

134. The proposed amendments have been reviewed by the Council's Urban Forester officer and Ecologist who overall have raised not objection to the proposed development subject to further details being secured by condition. The recommended ecology conditions related to the:

- securing of a Construction Environmental Management Plan,
- Native planting,
- Green roof details,
- securing bat boxes x 4 and Bird boxes x 6, and
- Wildlife friendly lighting.

The recommended urban forestry conditions relate to

- improvement to UGF through standard trees planted in connected tree pits to achieve a policy complaint UGF of 0.4,
- supporting the use of heat-island tolerant trees,
- confirmation and details of Tideway infrastructure landscape details,
- cross sections of connected tree pits, and
- planting schedules and soft landscape maintenance.

135. Subject to the recommended condition of consent and light of the proposed improvements to UGF and tree planting on Chambers Street, Officers consider that the proposed development will proceed in accordance with London Plan Policy G5 and Southwark Plan Policy P60.

## Daylight, sunlight and overshadowing

Internal performance of proposed scheme

136. When considering applications for housing, the NPPF states that authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (paragraph 130 C). The London Plan (2021) requires design of development to provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst the GLA Housing SPG (2017) also advocates an appropriate degree of flexibility to be applied to use of the BRE guidelines. As suggested in the BRE Guidelines, natural lighting is only one factor in site layout design and care should be taken to apply the guidance flexibly, taking into consideration the context of the Site and advantages of the Proposed Development. The Housing Design Standards LPG (2023) states that as a minimum, at least one habitable room should receive direct sunlight – preferably the living area and/or the kitchen and dining space. Locally, Southwark Plan Policy P14 states that development must provide adequate daylight and sunlight for new and existing residents.

137. Policy D6 of the London Plan requires developments to be designed to ensure there would be sufficient daylight and sunlight to new and surrounding houses that is appropriate for its context. Policy D9 states that daylight and sunlight conditions around a proposed tall building(s) and neighbourhood must be carefully considered. Policy P56 of the Southwark Plan "Protection of amenity" states that development will not be permitted where it causes an unacceptable loss of amenity to present or future occupiers or users, taking into account the impacts on privacy, outlook, sense of enclosure, odour, lighting, daylight, sunlight and microclimate. The adopted Residential Design Standards SPD expands on policy and sets out guidance for protecting amenity in relation to privacy, daylight and sunlight.

138. Paragraph 130 C of the NPPF states that when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).

139. The accompanying internal daylight and sunlight reports are prepared by Eb7 which are:

- Applicant's initially submitted sunlight and daylight study: 3864329-Daylight Sunlight assessment-DAYLIGHT SUNLIGHT REPORT-24.AP.1547
- Applicant's supplemental sunlight and daylight response with further consideration of neighbour impacts: 6421-250310-EKJB (DS Cons vs Prop Letter) + Excel copy of results (6421_R05_DS01- 6421-DSPR240617 TC and 6421_R05_DS02- 6421-DSPR240617 – TC)
- Applicant's EIA compliance note: CW_EIA_Note_FINAL 04 March 2025_compressed
- Applicant assessment of 2007 baseline: 6421-250523-EKJB (2007 Baseline Letter)
- Applicant assessment of 2007 baseline: 6421-250610-EK (2007 BASELINE ADDENDUM LETTER)
- Applicant assessment of 2007 baseline: 2007 Surveyed Baseline vs Consented – Images
- Applicant assessment of 2007 baseline: 2007 Surveyed Baseline DSO Results for Issue
- Applicant assessment of 2007 baseline: 2007 Surveyed Baseline vs Proposed - Images

140. The assessment produced by EB7 has been scrutinised by the Council's third party consultant Point2. Point2 have also reviewed the relevant documents submitted in objection to the scheme. Point2 have highlighted that EB7 have undertaken Daylight Illuminance and Sunlight Exposure assessments in line with the current (2022) edition of the BRE guideline. To achieve comparable results, EB7 have modelled both the consented and proposed schemes against the current guidance. The 2007 planning application assessed the consented scheme in relation to ADF (daylight) and ASPH (sunlight) guidance, as recommended by the previous editions of BRE guidance. Point2 confirm that current guidance sets more rigorous standards which are

generally more difficult to achieve than the now superseded ADF methodology. Both Point2 and council officers consider that assessing the scheme under the current BRE standards is appropriate.

141. In comparison to the consented position, the levels of compliance with the BRE daylight standards have increased from a level of 23% compliance to 53% compliance with daylight standards across Blocks A, B, C, and D. Similarly, compliance with sunlight standards has increased from 16% to 72% across Blocks A, B, C, and D. Eb7 summarise that the improvements are a result of the positive amendments to the design of the external façade and wintergarden design. Eb7's assessment identifies that the BRE guidance is to be interpreted flexibly and that full compliance may not always be possible in urban development where a number of important design factors such as the provision of balcony private amenity space and limiting solar gain / overheating may lead to a trade-off against achieving higher internal amenity levels.

142. Point2 requested some clarifications in terms of Eb7's methodology and the materials assumptions which have been relied on. Eb7 have responded and overall Point2 have confirmed they have no reason to the accuracy of the models completed by Eb7 or the figures presented.

143. In terms of daylight, Point2 have highlighted that, overall, the Proposed Scheme will achieve better levels of daylight and sunlight internally than the consented scheme. In terms of the compliance rate 53%, Point2 note that, while typically urban developments will achieve slightly higher levels of compliance, this is a marked improvement on the 23% compliance rate achieved under the consented scheme. Point2 note that note that there are a number of main living rooms within the scheme that achieve single figure Median Daylight Illuminance figures (i.e. these are significantly below the suggested targets), but they highlight that this is also the case for the consented scheme, which officers understand is a result of the design, siting and orientation of the currently approved scheme. Accordingly, given the achieved improvement against the consented position and the recognition of the constraints of delivering a scheme largely in line with the general parameters of the existing consent, Officers consider the achieved daylight levels are acceptable in this instance.

144. In relation to sunlight, Point2 highlight that the Proposed Scheme shows a marked improvement from the consented position, with the overall level of compliance increasing from 16% to 72%. Point2 consider that a compliance rate of 72% is acceptable for high density urban scheme such as this. Officers concur with Point2 assessment that the achieved sunlight performance is acceptable in this instance considering the improvements achieved over the consented scheme and constraints created by the existing consent.

145. Overall, officers consider that the amendments from the consented scheme result in a positive shift in sunlight and daylight levels and are therefore considered acceptable. The design of internal layouts and fenestration has maximised daylight and sunlight ingress as much as possible considering the constraints of the orientation and siting of the consented scheme. Where more significant transgressions occur, they are predominately due to the

delivery of private amenity spaces such as obstruction caused winter gardens or by a balconies overhead, which is a trade-off in terms of providing necessary private amenity spaces.

## Sunlight, Daylight and overshadowing impacts to adjoining neighbours

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

BRE Daylight Tests

147. The BRE Guidance sets out the rationale for testing the daylight impacts of new development through various tests. The first and most readily adopted test prescribed by the BRE Guidelines is the Vertical Sky Component assessment (VSC). This test considers the potential for daylight by calculating the angle of vertical sky at the centre of each of the windows serving the residential buildings which look towards the site. The target figure for VSC recommended by the BRE is 27%, which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. HoweverThe BRE have determined that the daylight can be reduced by approximately 20% of the original value before the loss is noticeable.

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

BRE Sunlight Tests

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

be adversely affected if the centre of the window:

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

150. In addition, the BRE sets out specific guidelines relating to balconies on existing properties. This guidance acknowledges that balconies and overhangs above an existing window tend to block sunlight, especially in summer. Even a modest obstruction may result in a large relative impact on the sunlight received.

151. The existing permission has been partially implemented and has been delayed due to the construction of the Thames Tideway Tunnel. Amendment have been approved by the Council to account for the presence of the required Thames Tideway Tunnel infrastructure and equipment on the application site. On this basis, Officers consider that the permission remains implementable. As set out earlier in the report, the consented scheme features four phases, which as approved provide for the delivery of 589 units. The affordable housing is concentrated in Phase 1 (182 affordable housing units) which were completed by St James in 2015.

152. To determine what is a perceptible or non-perceptible alteration beyond the consented scheme, Officers note that the approach referenced in the Enterprise House, 21 Buckle Street Appeal Decision (APP/ E5900/W/17/3191757) is a helpful example of refence where the Planning Inspector accepts and states, "*Many of the flats face onto narrow streets or buildings opposite and already have low VSC levels. That is a characteristic of the area. The appellants show that, while the calculated impact figures may indicate a drastic change, in practice, starting from an existing low level, many would experience no more than a 3% absolute loss of daylight, a virtually imperceptible change. The worst affected living rooms would experience less than 5% absolute loss, a barely noticeable change.*" Buildings to the west of the site do have narrow streets with low existing VSCs and are analogous in this respect. Changes above 3% VSC would potentially be noticeable, and changes in excess of these levels are considered in further detail.

153. The earlier application was subject to an Environmental Impact Assessment (EIA) and accompanied by an Environmental Statement, described in this section as the 2007 ES. The current s73 application for amendments to the 2013 permission is accompanied by an ES compliance note, which considers daylight, sunlight, and overshadowing. This report and the supporting reports prepared by EB7 identify and assess the following sensitive receptors of the proposed development:
To the east

- 208 Bermondsey Wall East
- 2-10 (evens) Bevington Street
- 210-212 Bermondsey Wall East
- 1-13 (odds) Bevington Street
- 8-14 Fountain Green Square

- Fountain House, Bermondsey Wall East
- 1-7 Fountain Green Square

To the south

- 14-28 Chambers Street
- Jacob House – Part of application scheme
- Hartley House – Part of application scheme

To the west

- Luna House
- Axis Court

154. The table below sets out the sunlight test results for the 2024 proposal in bold for the annual sunlight hours (APSH) and winter sunlight hours (winter PSH or WPSH), and the figures in (brackets) beneath are the equivalent number of rooms in the 2010 permission approved under 07/AP/1262. These are calculated against the surveyed 2007 baseline.

| | | APSH Reductions | | | | WPSH Reductions | | | |
|---|---|---|---|---|---|---|---|---|---|
| **Address** | **# of rooms tested** | **Pass APSH** | **20-29.9% loss** | **30-39.9% loss** | **40%+ loss** | **Pass WPSH** | **20-29.9% loss** | **30-39.9% loss** | **40%+ loss** |
| 208 Bermondsey Wall East | **4** (4) | **4** (4) | **0** (0) | **0** (0) | **0** (0) | **4** (4) | **0** (0) | **0** (0) | **0** (0) |
| 2-10 (evens) Bevington Street | **5** (5) | **5** (5) | **0** (0) | **0** (0) | **0** (0) | **5** (5) | **0** (0) | **0** (0) | **0** (0) |
| 210-212 Bermondsey Wall East | **15** (15) | **15** (15) | **0** (0) | **0** (0) | **0** (0) | **15** (15) | **0** (0) | **0** (0) | **0** (0) |
| 1-13 (odds) Bevington Street | **4** (4) | **4** (4) | **0** (0) | **0** (0) | **0** (0) | **4** (4) | **0** (0) | **0** (0) | **0** (0) |
| 8-14 Fountain Green Square | **1** (1) | **1** (1) | **0** (0) | **0** (0) | **0** (0) | **1** (1) | **0** (0) | **0** (0) | **0** (0) |
| Fountain House, Bermondsey Wall East | **24** (24) | **24** (24) | **0** (0) | **0** (0) | **0** (0) | **24** (24) | **0** (0) | **0** (0) | **0** (0) |
| 14-28 Chambers Street | **2** (2) | **2** (2) | **0** (0) | **0** (0) | **0** (0) | **2** (2) | **0** (0) | **0** (0) | **0** (0) |
| Luna House | **71** (71) | **68** (68) | **0** (1) | **2** (1) | **1** (1) | **65** (67) | **0** (0) | **0** (0) | **6** (4) |
| Axis Court | **53** | **28** | **1** | **1** | **23** | **31** | **0** | **2** | **20** |

| | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | (53) | (37) | (1) | (0) | (15) | (42) | (0) | (0) | (11) |
| Total | **179** (179) | **151** (160) | **1** (2) | **3** (1) | **24** (16) | **151** (164) | **0** (0) | **2** (0) | **26** (15) |

155. As Jacob House and Hartley House were part of the 2010 proposal and did not exist during the 2007 baseline, these receptors were considered under the 2024 baselineIs this. The same format applies here.

| | | **APSH Reductions** | | | | **WPSH Reductions** | | | |
|---|---|---|---|---|---|---|---|---|---|
| **Address** | **# of rooms tested** | **Pass APSH** | **20-29.9% loss** | **30-39.9% loss** | **40%+ loss** | **Pass WPSH** | **20-29.9% loss** | **30-39.9% loss** | **40%+ loss** |
| Jacob House | **69** (69) | **69** (69) | **0** (0) | **0** (0) | **0** (0) | **69** (69) | **0** (0) | **0** (0) | **0** (0) |
| Hartley House | **23** (23) | **23** (23) | **0** (0) | **0** (0) | **0** (0) | **23** (23) | **0** (0) | **0** (0) | **0** (0) |
| Total | **92** (92) | **92** (92) | **0** (0) | **0** (0) | **0** (0) | **92** (92) | **0** (0) | **0** (0) | **0** (0) |

156. The comparison tables below show the VSC and NSL results for these residential buildings which would experience a material change in daylight as a result of the proposed amendments (figures in bold), and the figures in brackets are the equivalent figures from the 2010 scheme approved under 07/AP/1262. These are calculated against the 2007 baseline.

| **VSC** | | | | | | |
|---|---|---|---|---|---|---|
| **Address** | **# of windows tested** | **Windows that pass** | **20.1-29.9% loss** | **30-39.9% loss** | **40%+ loss** | **proposal VSC reduction range** (2007 VSC range) |
| 208 Bermondsey Wall East | **11** (11) | **11** (11) | **0** (0) | **0** (0) | **0** (0) | **-** - |
| 2-10 (evens) Bevington Street | **31** (31) | **29** (29) | **2** (2) | **0** (0) | **0** (0) | **26.3% - 27.2%** (22.2% - 23.1%) |
| 210-212 Bermondsey Wall East | **32** (32) | **28** (28) | **1** (1) | **0** (0) | **3** (3) | **24.7% - 88.7%** (24.7% to 86.9%) |
| 1-13 (odds) Bevington Street | **45** (45) | **10** (10) | **7** (16) | **10** (2) | **18** (17) | **21.7% - 95.6%** (20.4% to 95.6%) |
| 8-14 | **37** (37) | **37** | **0** | **0** | **0** | **-** |

| | | | | | | |
|---|---|---|---|---|---|---|
| Fountain Green Square | | (37) | (0) | (0) | (0) | - |
| Fountain House, Bermondsey Wall East | **55** (55) | **55** (55) | **0** (0) | **0** (0) | **0** (0) | **-** - |
| 14-28 Chambers Street | **99** (99) | **94** (95) | **2** (2) | **1** (1) | **2** (1) | **26.3% - 58.5%** (20.5% to 49.3%) |
| Luna House | **171** (171) | **164** (167) | **4** (2) | **3** (2) | **0** (0) | **21.4% - 38.9 %** (25.4% to 33.5%) |
| Axis Court | **128** (128) | **64** (75) | **8** (13) | **14** (22) | **42** (18) | **20.2% - 95.5%** (20.7% to 100%) |
| Total | **609** (609) | **492** (507) | **25** (36) | **28** (27) | **65** (39) | |

157. As Jacob House and Hartley House were part of the 2010 proposal and did not exist during the 2007 baseline, these receptors were considered under the 2024 baseline. The same format applies here.

| **VSC Reduction** | | | | | | |
|---|---|---|---|---|---|---|
| **Address** | **# of windows tested** | **Windows that pass** | **20.1-29.9% loss** | **30-39.9% loss** | **40%+ loss** | **proposal VSC reduction range** (2007 VSC range) |
| Jacob House | **227** (227) | **97** (109) | **9** (9) | **18** (24) | **96** (85) | **20% to 99%** (20% to 97%) |
| Hartley House | **193** (193) | **90** (101) | **24** (23) | **30** (26) | **49** (43) | **20% to 93%** (20% to 90%) |

158. Officers have received an independent assessment of sunlight and daylight prepared on behalf of parties associated with Luna House and Axis Court (prepared Rights of Light Consulting(ROLC)) and other written objections. The following documents have been received in objection to the scheme in terms of sunlight and daylight and are uploaded to the Council's planning register:

- Response from consultee acting on behalf of neighbouring properties: ROLC Letter 281124
- Response from consultee acting on behalf of neighbouring properties (Objection to lack of consideration of original warehouse layouts): ROLC Letter 170425
- Objection to lack of consideration of original warehouse layouts: Additional doc for planning portal # 7 re warehouses

- pages 9-17 (16a-16i) of Objection to DSO impacts: Briefing doc chambers Wharf 3801 V1.0

The applicant's consultants EB7 has responded to the letters from ROLC in their reports dated 17 December 2024, 10th March 2025, 23 May 2025, and 10 June 2025. The document have also been reviewed by the Council's independent third party consultant Point2. An objector has suggested that the amendments to buildings B, C and D may be approved with a condition imposed saying that notwithstanding the submission, no changes to building A are approved. The changes to building A are part of the overall scheme and include changes to comply with fire safety requirements and for a change from gas to renewable energy on site. Officers to not believe that it would be reasonable to impose such a condition.

159. When granting the current permission Council Officers in the report for 07/AP/1262 dated 1/07/08 concluded at paragraph 83 that '*for an urban area the level of impact will be modest and has been kept to the minimum possible, and the retained levels of both daylight and sunlight to existing surrounding properties would be adequate and in keeping with a normal built up urban environment'*. Objectors have highlighted that they disagree with the assessment in the initial officer reports on they basis that they consider there were significant impacts to the west of the development, particularly at Axis Court, on the basis that objectors consider the recorded shifts in sunlight and daylight were significant. Further, objectors are concerned that the officer at that stage relied on similar wording to the application submission which they feel indicates a thorough assessment was not completed. That application was approved weighing the scheme as a whole, including the significant affordable housing proposed which is a material consideration for this amendment and a relevant baseline for the current assessment of sunlight, daylight, and overshadowing impacts.

160. The applicant has highlighted that there was an omission in the original scheme in relation to the necessary rooftop plant which was not included in all of the approved plans. In regard to this, the response from eb7 states:

> '*It is pertinent to note that the original daylight and sunlight assessment undertaken for the original application (ref: 07/AP/1262) did not account for the inclusion of roof top plant which would have the potential to slightly reduce daylight levels to neighbours. For the consented scheme to have been delivered in full, roof top plant would have been required. In accordance with Officer's requests, the current proposed scheme has been assessed with all the necessary plant, however the consented scheme has been assessed without any rooftop plant to align with the consented elevations. As a result, the height differential between the two schemes is greater than it would be in reality. This presents and absolute worst case in terms of assessment and potential differential in daylight levels.'*

161. As a result of the inclusion of the rooftop plant in the assessment of the current proposal and the continued omission of the rooftop plant from baseline, Officers consider that the applicant has conducted an accurate worst case comparison of the extant permission and proposed development.

162. As detailed above, the greatest changes in the impact from the implemented scheme to this amendment on the dwellings of Axis Court. Impacts on other residential buildings around the site not significantly different to the implemented scheme. The impact on Axis Court is a due to the inclusion of rooftop plant but mostly because of the increase in massing of Building A to the south as can be seen in the consented and proposed massing below.

Consented massing

Proposed massing

163. The results discussed by officers are based on the 2007 baseline result (as shown in the final issue excel file '2007 Surveyed Baseline DSO Results for Issue') with the exception of Jacob House and Heartley House which are considered against the 2024 baseline results as they are part of the application scheme.

**To the east**

**208 Bermondsey Wall East**

**Impacts on this property are compliance with the BRE guidance.**

**2-10 (evens) Bevington Street**
2 Bevington First floor, Room 3, Window 3, with existing VSC of 19.08 with15.2 approved 14.50 proposed equating to an absolute change of 5.2 and percentage change of 26.3%, a change of 0.7% from the consented baseline so a very small absolute change in VSC.
6 Bevington Ground floor, Room 2, Window 2, with existing VSC of 14.6 with 11.2 approved and 10.6 proposed equating to an absolute change of 4 and percentage change of 27.2%, a 0.6 change from the consented baseline. Acceptable on the basis that resulting change is 0.6 and likely imperceptible.

**210-212 Bermondsey Wall East (mislabelled Southwark Park Road in EB7 results)**

There are three windows which experience changes which result in non-compliance with VSC associated with this property, and that this was also the case under the preceding application. Further, the results of the NSL and APSH assessments are consistent with the consented position in terms of BRE compliance. The three properties which experience VSC non-compliance are discussed below.

- Ground floor Room 5 Window 7 - under the consented scheme the VSC shifts from 26.5 to 8.3 (68.6% change) and under the proposed scheme the VSC shifts to 7.8 (70.7% change), and reduction of 0.5 VSC from the baseline. This room is served by one other window which maintains the VSC achieved under the consented scheme.
- First Floor Room 5 Window 6 - under the consented scheme the VSC shifts from 32.2 to 8.1 and under the proposed scheme the VSC shifts to 7.60 (a 76.2% change). This room is served by three other windows which achieve VSC compliance.
- Second Floor Room 5 Window 5 - under the consented scheme the VSC shifts from 20.9 to 2.7 and under the proposed scheme the VSC shifts to 2.4 (88.7% change). This room is served by one other window which receives a VSC of 21.9% which is a good level for VSC in an urban location,

**1-13 (odds) Bevington Street –**

The impact for these properties is similar to the consented position.

**Fountain Green Square –**

The changes in VSC are modest with under 3% actual change in all cases. Instances where this impacts compliance with the BRE guidelines are discussed in further detail below.

- Second floor room R1 window 1 drops from 15.2% VSC under the consented position to 14.73%, which Officers is marginally below the established impact.

**Fountain House, Bermondsey Wall East –**

- The impact for these properties is in line with the guidance form the BRE

**To the south**

**14-28 Chambers Street –**

VSC: Overall, the resulting changes are all less than an absolute change of 1% VSC from the consented position in all instances, with the majority below 0.5 or lower, and therefore the changes are considered acceptable.
NSL: The There would be reductions in NSL compared to the impact form the consented scheme, however overall those impacts are in line with those established under the implemented scheme.
28 Chambers Street Ground Floor Room 1 – Consented NSL of 39% and a proposed NSL 35%, an absolute loss of 4% NSL from the consented position.
28 Chambers Street Ground Floor Room 3 – Consented NSL of 21% and proposed NSL 16%, an absolute loss of 5% NSL from the consented position.
28 Chambers Street First Floor Room 1 – Consented NSL of 33% proposed NSL of 30%, an absolute loss of 3% NSL from the consented position.
28 Chambers Street First Floor Room 2 – Consented NSL of 30% and proposed NSL of 26%, an absolute loss of 4% NSL from the consented position.
26 Chambers Street Ground Floor Room 1 – Consented NSL of 26% and proposed NSL of 21%, an absolute loss of 5% NSL from the consented position.
26 Chambers Street First Floor Room 1 – Consented NSL of 29% and proposed NSL of 27%, an absolute loss of 3% NSL from the consented position.
Flat 1 22 Chambers Street Second Floor Room 2 – Consented NSL of 67% and proposed NSL of 62%, an absolute loss of 5% NSL from the consented position.
Flat 1 22 Chambers Street Second Floor Room 4 – Consented NSL of 18% and proposed NSL of 15%, an absolute loss of 3% NSL from the consented position.
Flat 6 22 Chambers Street Third Floor Room 4 – Consented NSL 23% and proposed NSL of 21%, which is generally consistent with consented position.
Flat 11 22 Chambers Street Fourth Floor Room 4 – Consented NSL of 36% and proposed NSL of 28%, an absolute loss of 8% NSL from the consented position.
The impacts on NSL from this scheme would be noticeable for these properties, however, the residual levels would be similar to that which has already been consented.

**Jacob House –**

- 
- The council's advisors, Point2, have advised that In relation to the effects on Jacob House and Hartley House, rather than considering the effects of the Proposed Development by comparing to an existing baseline, it is more appropriate to compare to the consented position as these buildings were granted planning permission together with the consented massing on Phase 2 of the site. They have advised it is not relevant to consider the effects on these properties relative to the 2007 baseline, as the 2007 buildings were demolished prior to their construction. The below assessment considers the exiting 2024 baseline against the consented and proposed scheme as was initially submitted by EB7.
- VSC: Overall, the resulting changes are less than a 3% in VSC from the consented position.
- NSL: While the applicant has recorded that only 6 rooms would experience a noticeable reduction in NSL greater that 1m2, officers have recorded 8 instances which are set out below:
    - Fifth Floor Room 1 (LKD) (W1-2) – 20% reduction from consented position with 1.9m2 reduction
    - Fifth Floor Room 2 (bedroom) (W3) – 10% reduction from consented position with 1.2m2 reduction
    - Fifth Floor Room 3 (LKD) (W4-5) – 26% reduction from consented position with 1.8m2 reduction
    - Fifth Floor Room 5 (bedroom) (W6) – 13% reduction from consented position with 1.5m2 reduction
    - Sixth Floor Room 1 (LKD) (W1-2) – 25% reduction from consented position with 2.9m2 reduction
    - Sixth Floor Room 3 (LKD) (W4-5) – 29% reduction from consented position with 2.6m2 reduction
    - Ninth Floor Room 2 (bedroom) (W2) – 10% reduction from consented position with 1.5m2 reduction
    - Ninth Floor Room 3 (bedroom) (W3) – 14% reduction from consented position with 1.3m2 reduction

  The affected LKDs are set behind inset balconies which makes these rooms more susceptible to change and these impacts would be less severe without the balconies in place and the are considered acceptable. The impacts to bedrooms set out above are considered acceptable as in most cases the changes are only marginally above the 1m2

  **Hartley House –**
- As discussed above, the below assessment considers the exiting 2024 baseline against the consented and proposed scheme as was initially submitted by EB7.
- VSC: Overall, the resulting changes are less than a 3% in VSC from the consented position and therefore the changes are considered acceptable.
- NSL: While the applicant has recorded that only 7 rooms would experience a noticeable reduction in NSL greater that 1m2, officers have recorded 9 instances which are set out below:

- Second Floor Room 17 (LKD) (W20-21) – 10% reduction from consented position with 1.2m2 reduction
- Third Floor Room 17 (LKD) (W20-21) – 11% reduction from consented position with 2.1m2 reduction
- Fifth Floor Room 6 (Bedroom) (W8) – 9% reduction from consented position with 1.1m2 reduction
- Fifth Floor Room 8 (Bedroom) (W10) – 19% reduction from consented position with 1.2m2 reduction
- Fifth Floor Room 9 (Bedroom) (W11) – 14% reduction from consented position with 1.3m2 reduction
- Sixth Floor Room 8 (Bedroom) (W10) – 20% reduction from consented position with 1.5m2 reduction
- Sixth Floor Room 9 (Bedroom) (W11) – 16% reduction from consented position with 1.7m2 reduction
- Seventh Floor Room 8 (Bedroom) (W10) – 20% reduction from consented position with 2.1m2 reduction
- Eight Floor Room 8 (Bedroom) (W10) – 18% reduction from consented position with 2.2m2 reduction

- As with Jacob House, the affected LKD are set behind inset balconies which makes these rooms more susceptible to change. Therefore, as it is likely the impacts would be less severe without the balconies in place and therefore the impacts to the identified LKDs are considered acceptable.. The impacts to bedrooms set out above are considered acceptable as in most cases the changes are near the threshold where impacts would be readily noticeable and because, as is supported by the BRE guidance, bedrooms are typically accepted as less sensitive to sunlight and daylight changes.

**To the west**

**Luna House –**

VSC: Overall, the majority of resulting changes are less than a 3% absolute change in VSC from the consented position, or in compliance with VSC standard, and therefore the changes are considered acceptable including any cumulative impacts. The changes in access are below

- Flat 41 Luna House Sixth Floor Room 8 Window 13 Consented VSC of 37.4 Proposed VSC of 34.4 (alteration 3.4)
- Flat 41 Luna House Seventh Floor Room 11 Window 16 Consented VSC of 31.2 Proposed VSC of 27.7 (alteration 3.4)
- .

- NSL: Overall, the reductions in NSL are below 1m2 indicating the amendments would likely have an imperceptible impact. The exceptions are the below rooms. However, despite these reductions, as flagged by the eb7 these rooms retain NSL levels of 65% and 73% which officers consider are acceptable in an urban environment.
- Flat 4 Luna House Room R9 Reduces from consented NSL of 71% to proposed NSL of 65% (a 2.9m2 reduction)
- Flat 11 Luna House Room R9 Reduces from consented NSL of 80% to proposed NSL of 73% (a 3m2 reduction)

- APSH: Overall, 25 of the 32 main living spaces with windows show full compliance with the BRE Guidance and this level of compliance is consistent with the consented position.

**Axis Court –**

- Compared to the 2007 Baseline, the only property that would potentially experience a significantly increased level of effect compared to the consented scheme is Axis Court. Here reductions to 11 fewer windows accord with BRE guidance - reductions to 64 out of 128 windows are fully compliant with BRE guidance, as opposed to 75 (not 65 as stated by the 10 June EB7 letter) for the consented scheme, and 24 more windows will experience proportional reductions of more than 40%.
- The VSC shift of less than 3% absolute VSC from the consented position would be acceptable despite technical non-compliance with the BRE thresholds related to percentage change; these do result in some high percentage changes but are based on low existing and consented VSCs. Where there are reductions of more than 3% VSC, these are discussed further below. A15% absolute VSC referenced by EB7, Point2, and ROLC is commonly applied, including by Planning Inspectors. It is also the case that VSCs near 10 % VSC, may be acceptable in dense urban settings, especially where buildings feature overhanging massing which restricts their access to daylight and/or are sited in close proximity to neighbouring boundaries, as is the case in both instances with Axis Court. While the amended proposal features some properties with high percentages of VSC change, including some instances of 100% reductions, this was also the case under the extant planning permission. While the amended proposal feature some properties with low levels of retained VSC, including nil values, officers note the 2007 bassline data demonstrates that this was also the case in a number of instances for the existing and consented scheme. 41 windows will experience no change or positive change including improvements to the VSC of 14 windows ranging from absolute increase of 6.3 to 0.6. The largest anticipated shifts in absolute VSC are discussed below.
- Flat 33 Sixth Floor Room R4 Window 9 – VSC shift from 32.0 existing to 28.3 under the existing consent and 25.3 under the proposed amendments – A reduction of 3 from the consented position, this window retains a very good VSC.
- Flat 33 Sixth Floor Room R5 Window 10 – VSC shift from 32.7 existing to 28.9 under the existing consent and 25.7 under the proposed amendments – A reduction of 3.1 from the consented position and a VSC of more than 27% compliance with BRE guidance is achieved.
- Flat 33 Sixth Floor Room R5 Window 11 – VSC shift from 33.7 existing to 29.8 under the existing consent and 26.5 under the proposed amendments – A reduction of 3.3 from the consented position but with a good level VSC

- Flat 24 Fourth Floor Room R7 Window 15 – VSC shift from 29.3 existing to 20.8 under the existing consent and 17.3 under the proposed amendments – A reduction of 3.5 from the consented
- Flat 24 Fourth Floor Room R8 Window 16 – VSC shift from 29.8 existing to 22.1 under the existing consent and 18.1 under the proposed amendments – A reduction of 4.0 from the consented position.
- Flat 52 Fourth Floor Room R9 Window 17 – VSC shift from 30.1 existing to 23.4 under the existing consent and 19.0 under the proposed amendments – A reduction of 4.4 from the consented position.
- Flat 52 Fourth Floor Room R10 Window 18 – VSC shift from 29.5 existing to 23.9 under the existing consent and 19.5 under the proposed amendments – A reduction of 4.3 from the consented position.
- Flat 53 Fourth Floor Room R11 Window 19 – VSC shift from 26.1 existing to 21.4 under the existing consent and 17.5 under the proposed amendments – A reduction of 3.8 from the consented position.
- Flat 18 Third Floor Room R8 Window 18 – VSC shift from 27.3 existing to 18.2 under the existing consent and 15.1 under the proposed amendments – A reduction of 3.1 from the consented position.
- Flat 18 Third Floor Room R8 Window 19 – VSC shift from 27.4 existing to 18.7 under the existing consent and 15.4 under the proposed amendments – A reduction of 3.3 from the consented position. in accordance with generally accepted VSC in urban areas.
- Flat 47 Third Floor Room R9 Window 20 – VSC shift from 27.5 existing to 19.4 under the existing consent and 15.8 under the proposed amendments – A reduction of 3.6 from the consented position.
- Flat 47 Third Floor Room R10 Window 21 – VSC shift from 26.3 existing to 19.0 under the existing consent and 15.4 under the proposed amendments – A reduction of 3.7 from the consented position.

- Reductions resulting to less than 15% VSC.
  - Flat 48 Third Floor Room R11 Window 22 – VSC shift from 22.3 existing to 16.3 under the existing consent and 12.9 under the proposed amendments – A reduction of 3.4 from the consented position.
  - Flat 48 Third Floor Room R12 Window 24 – VSC shift from 16.8 existing to 12.2 under the existing consent and 9 under the proposed amendments – A reduction of 3.3 from the consented position.
  - Flat 42 Second Floor Room R10 Window 20 – VSC shift from 23.8 existing to 15.3 under the existing consent and 12.4 under the proposed amendments – A reduction of 3.0 from the consented position.
  - Flat 32 Fifth Floor Room R3 Window 6 – VSC shift from 30.4 existing to 24.0 under the existing consent and 20.9 under the

proposed amendments – A reduction of 3.0 from the consented position.

- Flat 32 Fifth Floor Room R4 Window 7 – VSC shift from 31.4 existing to 24.7 under the existing consent and 21.2 under the proposed amendments – A reduction of 3.4 from the consented position.
- Flat 30 Fifth Floor Room R5 Window 8 – VSC shift from 31.9 existing to 25.3 under the existing consent and 21.6 under the proposed amendments – A reduction of 3.7 from the consented position
- Flat 30 Fifth Floor Room R5 Window 9 – VSC shift from 32.5 existing to 26.5 under the existing consent and 22.4 under the proposed amendments – A reduction of 4.1 from the consented position.
- Flat 30 Fifth Floor Room R6 Window 10 – VSC shift from 32.8 existing to 27.6 under the existing consent and 23.2 under the proposed amendments – A reduction of 4.4 from the consented position.
- Flat 30 Sixth Floor Room R2 Window 14 – VSC shift from 35.2 existing to 31.7 under the existing consent and 28.2 under the proposed amendments – A reduction of 3.6 from the consented position.
- Flat 56 Fifth Floor Room R7 Window 11 – VSC shift from 33.2 existing to 28.9 under the existing consent and 24.6 under the proposed amendments – A reduction of 4.4 from the consented position.
- Flat 56 Fifth Floor Room R8 Window 12 – VSC shift from 33.7 existing to 30.1 under the existing consent and 26.9 under the proposed amendments – A reduction of  from the consented position. Acceptable on the basis that overall VSC of over 27% is achieved in accordance with BRE guidance.

164. Overall, as discussed in detail above, while there would be some reductions in sunlight and daylight provided to adjoining properties, these alterations would be generally consistent with levels which have been previously consented on this this site. Given the site allocation under the Southwark Local Plan, where more intensive development is expected and where the BRE guidelines should be applied flexibly in accordance with the NPPF, the impacts are considered on acceptable on balance. Whilst the majority of windows tested meet BRE guidelines, a relatively small minority of the impacts would go beyond the recommended guidelines but these are not of such significance that it would warrant a reason for refusal of an otherwise acceptable development.

## Overshadowing of amenity spaces

165. The BRE guidance advises that for an amenity area to be adequately lit it should receive at least 2 hours sunlight over half of its area on the 21st March. If the area receiving 2 hours of sunlight is reduced by more than 20% it is considered that the change may be noticeable. The approach within the ES addendum is to consider whether the proposed amendments now sought would result in a material or immaterial effect in terms of overshadowing over

and above those which would have arisen from the approved scheme. An immaterial effect is defined as:

- The change is less than 2% of the total area of an overshadowing receptor which receives at least two hours of sun on 21st March.

166. The minimum retained value for an overshadowing receptor which is considered immaterial is defined as:

- 50% of the total area of an overshadowing receptor retains at least 2 hours of sun on 21st March.

167. Overshadowing diagrams are provided in the initial 2007 ES. Due to the orientation of the scheme with the River Thames to the north of the application site and the path of travel of the sun, shadows from the scheme are cast directly northward over the Thames for a good portion of the day. Accordingly, officers anticipate the shadow will travel from the west in the morning hours toward the east in the afternoon limiting impacts to the south across Chambers Street and ensuring that amenity spaces to the west and east will achieve the minimum requirements throughout the day. For the avoidance of doubt and in response to concerns raised by objectors, the applicant has undertaken an assessment of the impact of both the consented and proposed s.73 massing on amenity spaces and balconies within the western neighbour Axis Court. The assessments consider 4 gardens at ground level and eight balconies / roof terraces across the fifth and sixth floor of Axis Court, although officers agree with the applicant's assessment that in line with the BRE guidelines this test is not typically applied to balconies. The results of the assessments show that with the proposed s.73 massing in place, 10 of the 12 areas show full compliance with the BRE Guidance, presenting no reduction in BRE compliance from the consented position as shown in the table below. Accordingly, officers agree with the applicant that this presents no material change from the consented position, with both areas presenting the same or similar impacts with the consented massing in place.

168. The below table summarises the results in relation to Axis Court. The minimum retained value for an overshadowing receptor which is considered immaterial is defined as: 50% of the total area of an overshadowing receptor retains at least 2 hours of sun on 21st March.

| **Address** | **Existing % 2+ hours sun on ground** | **Proposed % 2+ hours sun on ground** | **BRE compliant Proposed** (consented) |
|---|---|---|---|
| Axis Court Flat 2 | **0%** | **0%** | **Yes** (Yes) |
| Axis Court Flat 3 | **5%** | **0%** | **No** (No) |
| Axis Court Flat 4 | **0%** | **0%** (0%) | **Yes** (Yes) |

| | | | |
|---|---|---|---|
| Axis Court (ground floor space) | **0%** | **0%**<br>(0%) | **Yes**<br>(Yes) |
| Axis Court Flat 32 | **33%** | **26%** | **No**<br>(No) |
| Axis Court Flat 30 | **54%** | **54%** | **Yes**<br>(Yes) |
| Axis Court Flat 30 | **71%** | **71%** | **Yes**<br>(Yes) |
| Axis Court Flat 56 | **55%** | **55%** | **Yes**<br>(Yes) |
| Axis Court Flat 56 | **79%** | **79%** | **Yes**<br>(Yes) |
| Axis Court Flat 57 | **90%** | **89%** | **Yes**<br>(Yes) |
| Axis Court Flat 33 | **83%** | **83%** | **Yes**<br>(Yes) |
| Axis Court Flat 59 | **88%** | **88%** | **Yes**<br>(Yes) |

169. Based on interpterion of the overshadowing diagrams in the 2007 ES and the further information provided by the applicant in relation to outdoor spaces at Axis Court, the proposed amendments in terms of overshadowing impacts are acceptable..

Other impacts of proposed amendments on the amenity of adjoining occupiers and surrounding area

170. Policy P56 of the Southwark Plan “Protection of amenity” states that development will not be permitted where it causes an unacceptable loss of amenity to present or future occupiers or users, taking into account the impacts on privacy, outlook, sense of enclosure, odour, lighting, daylight, sunlight and microclimate.

Outlook and privacy

171. 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. The Residential Design Standards SPD suggests that to prevent unnecessary problems of overlooking, loss of privacy and disturbance, development should achieve a minimum 12m separation at the front of the building and any elevation that fronts onto a highway, and a

minimum distance of 21m at the rear of the building.

172. Separation distances between the proposed development and the surrounding buildings would be similar to those which would have arisen from the extant permission, and the following properties would either be unchanged from the consented position or comply with the Residential Design Standards SPD in terms of separation distances achieved:

To the east

- 208 Bermondsey Wall East – a minimum of 51.6m proposed compared to 51.6m under the consented development
- 2-10 (evens) Bevington Street – a minimum of 50.9m proposed compared to 50.9m under the consented development
- 210-212 Bermondsey Wall East – a minimum of 7.2m proposed compared to 7.2m under the consented development
- 1-13 (odds) Bevington Street – a minimum of 15.5m proposed compared to 15.5m under the consented development
- 8-14 Fountain Green Square – a minimum of m proposed compared to m under the consented development
- Fountain House, Bermondsey Wall East – a minimum of 25.2m proposed compared to 25.2m under the consented development
- 1-7 Fountain Green Square – a minimum of 64.3m proposed compared to 64.3m under the consented development

To the south

- 14-28 Chambers Street – a minimum of 12.8m proposed compared to 12.8m under the consented development
- Jacob House – a minimum of 12.5m proposed compared to 12.5m under the consented development
- Hartley House – a minimum of 12.5m proposed compared to 12.5m under the consented development

To the west

- Luna House – a minimum of 14.1m proposed compared to 14.8m under the consented development

173. In one instance, the proposed amendments to the scheme will result in an exceedance of the minimum separation distance of 12m recommended in the Residential Design Standards SPD. While this separation distance is generally applied across streets, as this section of the building hosts the car park entrance and further up the access from Bermondsey Wall West onto the Thames Path, this minimum separation distance is considered a useful point of reference in this instance considering the function of this space and the dense nature of the surrounding environment. This instance is to the west at Axis Court where a minimum separation distance of 11.7m is proposed compared to a 12.1m separation distance under the consented development. As shown in the image below, the southern extent of Building A is the closest point of the proposed development to Axis Court and the remainder of the building is setback at greater distances from the lower facades and upper-level dwellings at Axis Court. The southern element of Axis Court which will be affected by the 0.4m reduction in separation distance is a brick wall which

feature no glazing and therefore this minor exceedance of the recommended threshold is considered to have negligible impact in this instance. This situation is shown in the second figure. As shown in the first figure, all other aspects of Axis Court and the proposed development will exceed the minimum separation distance of 12m indicated by the SPD and will be generally consistent with the consented layout.

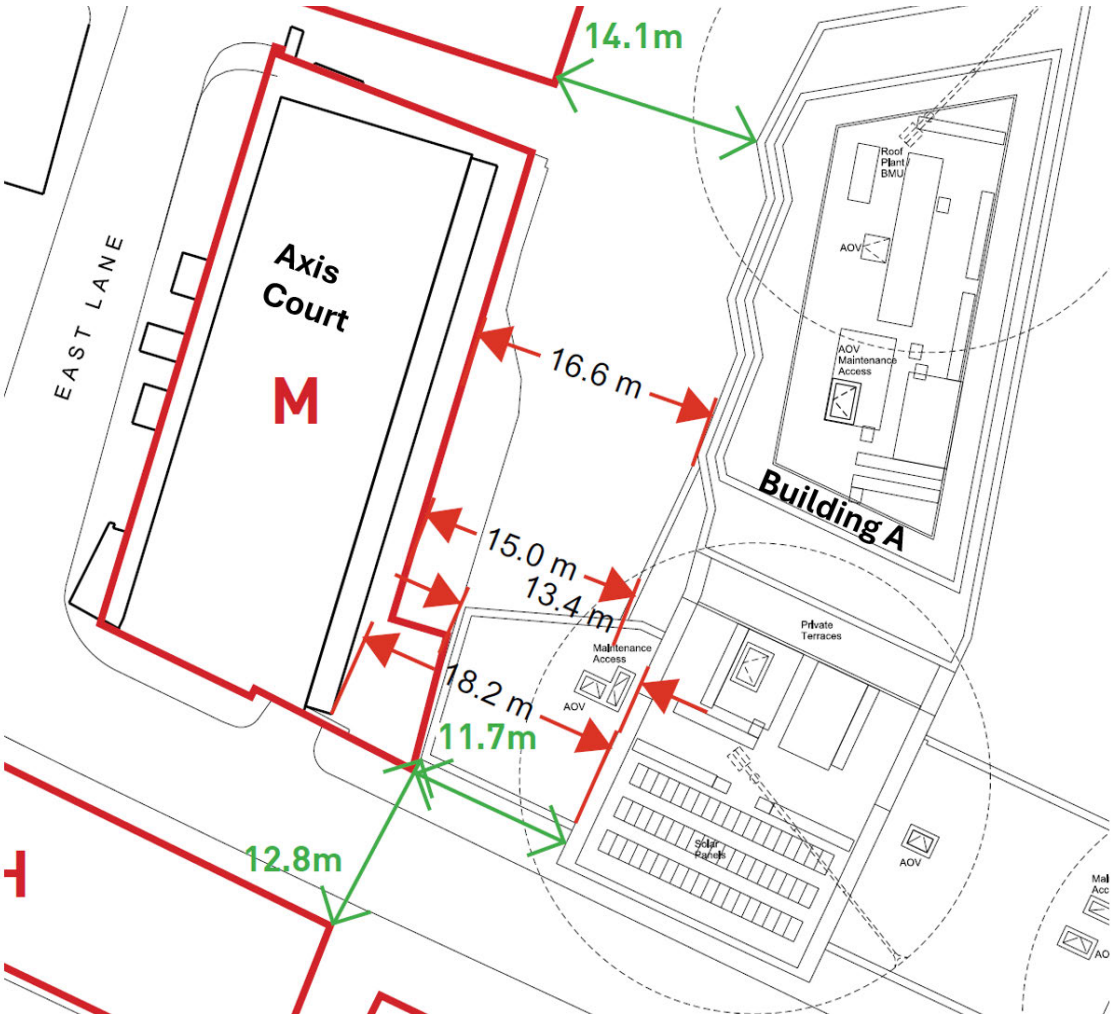



*Figure 23 Separation distance between easter façade of Axis Court and Building A*

*Figure 24 Eastern facade of Axis Court*

174. While the approved outdoor amenity space is amended from winter gardens to balconies, this is not considered to greatly change the relationship with adjoining site as the balconies will be inset in a similar manner to the consented development. Accordingly, the proposed amendments are not considered to protect the amenity of adjacent occupiers in a manner consistent with layout and approach approved under the existing consent.

**Impact of the proposed uses**

175. The proposed development would contain an increased provision of residential amenity space including new pool, theatre, and gym uses. Further, the proposed amendments include the introduction of Air Sourced Heat Pumps at the rooftop level. The Council's Environmental protection officer has recommended additional conditions of consent to ensure that occupier of the proposed development and neighbouring residents will be appropriately mitigated from impacts arising from the development.

**Construction impacts**

176. A representation has been received from the neighbouring school, St Michael's Catholic College, in relation to ensuring construction noise is minimised during exam times and that that public pathways on Chambers Wharf and Llewellyn Street are not closed as they are the school's evacuation routes. Further representation have been received in relation to construction impacts including in relation to the duration and intensity of works on site following the Thames Tideway development. Additionally, Transport for London and other consultee have also called for construction impacts to be managed through a condition securing a Construction Environmental Management Plan (CEMP). The previous consent did not have a construction management condition imposed and the applicant has agreed to the imposition of a condition of consent requiring a CEMP and this includes the provisions requested by the school. This requires a detailed construction management plan to be submitted for approval has been included in the draft recommendation, and this would require noise, vibration and dust monitoring to be carried out during construction works. Subject to the recommended conditions of consent, officers consider construction works would be adequately managed to control construction impacts arising from the development.

177. To conclude, it is considered that the proposed development would preserve the amenity of neighbours in accordance with the extant planning permission. No adverse privacy impacts would occur, and a number of conditions are recommended to limit the impact of the proposed uses and construction impacts. Issues related to wind are discussed further below in the section on environmental impacts.

**Transport and highways**

178. The key changes to the development proposals from the permitted scheme related to transport are:

- Changes in on-site provision for cyclists, including updated cycle parking provision;
- Changes to the approved car parking design including a net reduction of 63 spaces.

Additionally, the proposed amendments result in a reduction in commercial space, by Use Clase A/B1 space reduced by -113sqm, and reduction in unit numbers, by 23 units.

179. The transportation principles of the scheme, in relation to a basement level car park with access off of Chambers Street, an active street frontage along Chambers Street with shops and residential entryways, and public realm with connection through the site and along the river frontage for the Thames Pathway, remain largely unchanged. Accordingly, the information in the environmental statement addendum, compliance note prepared by Trium dated March 2025, is sufficient to assess the proposed amendment in this instance In line with London Plan Policy T4.

180. While car free development is cited as the starting place for new development in the London Plan, extant planning permission is a material consideration and features 163 car parking spaces, and this would be reduced to 100 spaces resulting in an improvement in this regard. TfL have raised that updated trip generation data should be provided as part of this application. Officers note that the principle of the delivery of 589 homes in this location is clearly established by the extant planning permission, and the delivery of these homes has been hampered by the TTT scheme. As the number of units (-23), size of commercial units, and number of car parking spaces (-63) are all being reduced, no significant impact to trip generation is anticipated. Accordingly, it is not considered that the revised proposals would have a significant adverse impact on the operation of the transport networks and, therefore, terms of London Plan Policies T1 and T4 and Local Plan Policy P50.

181. A draft Construction Environment Management Plan (CEMP) has also been submitted with the application, which fulfils the requirements of London Plan Policy T4, as it aims to reduce emissions, enhance vehicle and road user safety, and reduce congestion throughout the construction period of the amended proposals. TfL have requested that further details be provided on the draft CEMP at this stage and have requested that a Construction Logistics Plan (CLP) also be secured by condition. The applicant has advised it is not possible to provide further CEMP details at this stage in the development. Officers have recommended that conditions be imposed securing final approval of CEMP and CLP to address TfL's comments.

182. TfL indicated that Council should ensure that servicing movements will be accommodated on-site to align with Policy T7. Servicing vehicles should enter and exit the site in forward gear and should not impact on the safe movement of pedestrians and cyclists within or outside of the site. Further, TfL recommend that a Delivery and Servicing Plan is secured through condition to align with Policy T7. No amendments are proposed to the extant planning permissions in relation to delivery and servicing. Final details of delivery and service are secured by condition.

183. TfL have advised that a full Travel Plan should be secured through condition, providing targets for encouraging sustainable and active travel over five years in line with the Strategic Mode Shift outlined in Policy T1. The applicant has agreed to condition this requirements and a condition securing the submission and approval of a travel plan is recommended.

Cycle parking

184. The extant scheme features 450 two tier cycle parking spaces within the basement. Through discussions with the applicant prior to submission, the cycle parking facilities were redesigned to better align with current policy requirements, despite the constraints imposed the historic basement layout. The proposed amendments result in an increase of 220 cycle parking space, which is considered a significant improvement over the provision in the extant scheme. In total, the amended proposal features of 670 basement level cycle parking spaces comprising:

- 608 2 tier stands (90%),

- 34 larger tubular stands (5.07%), and
- 28 tubular stands (4.17%).

185. Overall, the Council's Transport Policy team consider the proposals appear to accord to London Plan 2021 and London Cycling Design Standards 2014, and as such the proposals for cycle parking are strongly supported by Transport Policy. The Council's Transport Policy team advised that the amended cycle store layouts be secured by condition to ensure that the quality of cycle provision is retained through to delivery. Transport for London have raised detailed questions related to the mix of stands and minimum and isle widths, which they have requested should be a minimum of 2.5m. Further TfL have requested that a mix of 20% Sheffield or tubular stands be provided including a minimum of 5% larger spaces stands. The Design and Access statement demonstrates the mix of stands and isle widths. The majority of isle widths are in accordance or exceed TfL's minimum requirements. There are some limited instances at pinch point with column where this is reduced. The applicant has provided c10% Sheffield stands with 5% provided as wider spaced stands. Considering the constraints of the historic basement design and that an increase of 220 cycle parking spaces was achieved, and a related reduction of 63 car parking spaces, officers consider the amendments are a significant improvement over the extant planning permission and accordingly are acceptable in this instance.

186. In terms of access, TfL have flagged that access to the stores is provided via the public realm and via the residential lobbies. TfL's preference is that access should be provided only via the residential lobbies. The applicant advised this point could be resolved at the submission of details stage. Considering the historic nature of the scheme, officers consider the arrangement with access provided through the lifts and the basement is acceptable in this instance, noting that this space will likely be closely managed and under CCTV.

187. The application features only limited amendments to the public realm plan, largely in relation to accommodation the required TTT infrastructure and accordingly no amendments are proposed to the approved short stay cycle parking provision as part of this application. Final short stay cycle parking details, and cycle parking details for the commercial units, would be secured by condition at a minimum of two commercial spaces and 46 short-stay spaces.

Cycle parking requirements

| Southwark Plan | Long Stay | Short Stay |
|---|---|---|
| Residenitial | 625 Spaces<br>Complies | 38 Spaces<br>Secured by condition |
| Commercial (food retail) | 2 Spaces<br>Secured by condition | 8 Spaces<br>Secured by condition |

| London Plan | Long Stay | Short Stay |
|---|---|---|
| food retail above 100 sqm | 1 Space<br>Secured by condition | 8 Spaces<br>Secured by condition |
| Residential | 670 cycle parking spaces | 11 Spaces |

| | | |
|---|---|---|
| | Complies | Secured by condition |

Healthy Streets

188. TfL have raised that a day and night-time Active Travel Zone Assessment (ATZ) is required to review the quality and safety of the walking and cycling environment to key destinations and to identify possible improvements that will further encourage active travel and mode shift the 10 Healthy Streets indicators in line with London Plan policy T4 (Assessing and mitigating transport impacts). To support the Mayor's strategic mode shift target, which is for 80% of all journeys to be made by sustainable and active modes by 2041, TfL have requested an ATZ and Night-time ATZ to be undertaken to ensure compliance with London Plan policies T2 (Healthy Streets) and T4 (Assessing and mitigating transport impacts). Officers note that this requirement would typically be resolved prior to determination. In the instance, as this requirement was not a material consideration when the preceding applications were determined, and considering the scope of the changes proposed, this has not been requested at this stage. The applicant has responded to TfL and confirmed that they agree for this requirement to imposed by condition. However, as this requirement did not apply to extant permission, officers do not consider this requirement is applicable in this instance.

**Fire safety**

189. Policy D12 of the London Plan (Fire Safety) requires all development proposals to achieve the highest standards of fire safety. All development proposals must be accompanied by a fire statement, i.e. an independent fire strategy produced by a third party, suitably qualified assessor.

190. The changes in fire safety requirements since the planning permission have partially driven the need for the proposed amendments. A fire statement (London Plan Fire Statement – Issue 06 dated 10 December 2024 prepared FDS Consult UK) and Gateway 1 Fire Statement (FDS Consult UK, Project Number 8198, Issue 6) prepared by suitably qualified personnel at FDS Consult UK have been submitted by the applicant, in accordance with Policy D12. The submitted Fire Statements, detail the fire safety strategy the proposed development, Blocks A, B, C, and D, and demonstrates compliance with London Plan Policy D12 (Fire Safety).

191. The Health and Safety Executive (HSE) have revised the submission and have advised that the HSE is content with the fire safety design as set out in the project description, to the extent it affects land use planning considerations. Further, the London Fire and Emergency Planning Authority have been consulted and they have raised no objections to the proposed amendments. On this basis, it is considered that the Fire Strategy addresses the requirements set out in the London Plan policy and that it should be secured by way of a condition. Detailed fire safety matters would be considered under the Building Regulations at the next stage of the design. The HSE has confirmed that the proposed amended plans are acceptable, and that any outstanding issues would need to be dealt with at the next stage of the design i.e. post-planning.

**Energy and sustainability**

192. Policy SI 2 ‘Minimising greenhouse gas emissions’ of the 2021 London Plan sets out that development proposals should be net zero carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the Mayor’s energy hierarchy. 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.

193. This policy requires major development to be zero carbon and to achieve an on-site reduction in carbon dioxide emissions of 35% beyond Building Regulations Part L 2013, including a 10% reduction through energy efficiency measures under the ‘be lean’ stage for residential uses and 15% for non-residential uses. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided either through a payment in lieu contribution to the borough’s carbon offset fund, or off-site provided an alternative proposal is identified and delivery is certain. The zero-carbon requirement is repeated through policy P70 of the Southwark Plan ‘Energy’, although with the requirement for 100% on-site savings for residential units and a minimum of 40% on-site savings for non-residential uses. The Southwark Plan policy also includes the option for the zero-carbon shortfall to be offset with a financial contribution or offsite provision to be secured where it has been demonstrated that achieving zero carbon on-site is not possible.

194. The requirements in the Development Plan related to sustainability and energy performance have greatly altered since the scheme was originally approved in 2010. Energy and sustainability measures for the amended proposal have been improved through pre-application discussion with the applicant, resulting in amendments that endeavours to reduce CO2 emissions as far as reasonably possible in the context of minimising changes to the extant planning permission.

195. The application includes an energy and overheating strategy prepared by Hodkinson, dated December 2024. The report explains that the extant scheme was designed in accordance with Part L 2006 of Building Regulations. The revised proposal has been amended to accord with Parts L and O 2021 of Building Regulations. Air source heat pumps are proposed to be the predominant heating source for the development, providing a site wide heat network. Solar PV panels on the roof are also proposed. This report estimates that the proposed Be Lean, Be Clean and Be Green measures will result in an estimated site wide 74% CO2 reduction over a Part L 2021 baseline. There will be obligations to secure the proposed measures and monitoring obligations, as well as the revised carbon offset contribution of £280,207, using the price of £95 per tonne of CO2, for a period of 30 years.

196. The proposed energy strategy would achieve an overall on-site reduction in

carbon emissions of 74% beyond the Building Regulations, significantly exceeding the 35% on-site requirement under the London Plan. Whilst it would not meet the Southwark Plan policy of 100% on-site savings for the new homes, a condition to secured compliance with this minimum requirements and to investigate further improvements is recommended. There are a number of detailed technical queries raised by the Council's sustainability officer which have been shared with the applicant to respond, including information on energy demand associated with the introduction of the ASHPs, mechanical ventilation, changes in wall thickness and other and clarification regarding some of the other and inputs into the energy strategy. In consultation with the sustainability officers, it is recommended that these matters be secured by way of a condition. In order to meet the carbon zero requirements that a minimum contribution of £280,207 be secured as planning obligation.

197. **Be seen** – Policy SI 2 of the London Plan introduces new 'be seen' requirements to monitor, verify and report on energy performance. Clauses would be included in the s106 agreement to verify the actual carbon savings delivered by the development, with an adjustment to the carbon off-set green fund contribution if required.

198. **Unregulated carbon emissions** - Policy SI-2 of the London Plan requires major development proposals to calculate and minimise carbon emissions from other parts of the development which are not covered by the Building Regulations (unregulated emissions) such as from plant and equipment. The applicant has advised that unregulated energy use would be reduced through measure such as energy efficient lighting and other efforts to enable future residents to minimise their unregulated electricity consumption.

199. **Overheating -** Policy SI 4 of the London Plan 'Managing heat risk' requires major development proposals to demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems. It sets out a cooling hierarchy which requires measures such as appropriate glazing, solar shading and the provision of green infrastructure to be provided first, before relying on mechanical ventilation and cooling systems.

200. The application includes an energy and overheating strategy prepared by Hodkinson, dated December 2024. An overheating assessment has been completed for both the consented and amended scheme, to demonstrate the passive design measures that have been implemented to reduce overheating risk, which the applicant considers has resulted in a significant reduction in overheating hours with cooling measure proposed to alleviate any shortfall in overheating requirements. Compliance with these contemporary Part O requirements have required amendments such as changing façade wall thickness which has been increased, floor to floor heights have increased in certain locations, the proportion of solid façade has been increased, and openable windows and ventilation panels have been added. Further, mechanical ventilation heat recovery has been provided for all units.

201. There are a number of detailed technical queries raised by the Council's sustainability officer which have been shared with the applicant to respond,

including information on energy demand associated will be changed as a result of the overheating related amendments including mechanical ventilation, changes in wall thickness and other and clarification regarding some of the other and inputs. In consultation with the sustainability officers, it is recommended that a finalised overheating strategy be secured by way of a condition. Overall, it is considered that the amendments to the scheme will greatly enhance the development's performance in terms of overheating performance and the securing final details by condition will ensure compliance with Policy SI 4 is achieved.

**Whole life-cycle carbon emissions and circular economy**

202. Part F of policy SI 2 of the London Plan states 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 carbon emissions resulting from the construction and the use of a building over its entire life, including producing construction materials right through to its demolition and disposal.

203. **Circular economy** – Policy SI7 of the London Plan 'Reducing waste and supporting the circular economy' seeks to achieve resource conservation, waste reduction, increases in material re-use and recycling, and reductions in waste going for disposal. Applications which are referable to the GLA should promote circular economy outcomes and aim to be net zero-waste, and should be accompanied by a Circular Economy Statement.

204. A Whole Life Cycle Carbon Emissions (WLCCE) Assessment prepared by Hodkinson has been submitted with the application. This considers how embodied carbon would be minimised throughout the stages of the development including by minimising construction emissions, minimising water use, utilising materials such as wood which naturally sequester carbon, and minimising materials used or using recycled materials. The applicant has estimated that this approach would result in approximately 93,230 tonnes of carbon savings over a 60 year period. While the Council's Suitability Officer has raised that the scheme will exceed the GLA's benchmarks, the GLA have reviewed the application and have confirmed the amendments are not considered to result in new strategic issues. The submission indicates that inputs are not finalised, and accordingly requirements have been secured by condition to assess final details in accordance with Policy SI7. As such a condition requiring a revised Circular Economy Statement has been included in the draft recommendation.

205. **BREEAM** - Policy P69 'Sustainability standards' of the Southwark Plan requires the non-residential development uses achieve at least BREEAM 'excellent'. A condition to secure this in relation to the commercial spaces has been included in the draft recommendation.

206. **Water resources** - Policy SI 5 requires developments to incorporate measures such as smart metering and water saving measures to help to achieve lower water consumption rates. In this instance the proposed

development would incorporate measures such as water meters, water efficient fittings and rainwater harvesting. The recommended energy and suitability conditions secure a requirement for a reduction in potable water demand to a maximum of 105 litres per person per day in accordance with policy SI 5 of the London Plan. Thames Water has requested a number of conditions and informatives, and these have also been included in the draft recommendation.

207. **Sustainable design and construction -** Sustainable design and construction is considered within the energy and overheating strategy prepared by Hodkinson, dated December 2024, which summarises the various measures which would be incorporated to reduce carbon emissions from the development.

208. The three overarching objectives for sustainable development set out in the NPPF relate to economy, society, and the environment. With regard to economic and social objectives, the proposed development would bring a a brownfield site into use, and would create jobs during construction and within the completed development. It would deliver additional public realm, new playspace, and a significant quantum of new housing. The environmental proposals have been outlined above, including measures to reduce carbon emissions and water consumption.

209. **Sustainability conclusions** - The applicant has agreed for the above requirements to be secured by condition and accordingly officers recommend conditions of consent related to the following be included a part of any forthcoming decision:

- Energy and Water Efficiency;
- On-site Renewable Energy Technologies;
- Ventilation, cooling and overheating mitigation;
- BREEAM;
- Circular economy – early stage;
- Whole life carbon – early stage;
- Circular economy – post-completion;
- Whole life carbon – post-occupation; and
- Be Seen (Policy SI2 (Minimising greenhouse gas emissions)).

**Environmental matters and environmental impact assessment**

210. Southwark Plan Policy P65 states that development must achieve or exceed Air Quality Neutral standards and address the impacts of poor air quality on building occupiers and public realm users. It further notes that any shortfall in air quality standards on site must be secured off site through planning obligations or as a financial contribution.

211. London Plan Policy SI 1 states that development proposals should not lead to further deterioration of existing poor air quality. Development proposals should, as a minimum, be Air Quality Neutral, and use design solutions to prevent or minimise increased exposure to existing air pollution.

212. The 2007 ES in Volume 2 Chapter 6 assessed the air quality impacts associated with approved scheme. This chapter identifies that the primary

anticipated air quality impacts were related to construction dust and vehicle traffic. In terms of impacts to nearby sensitive receptors, the anticipated impacts were assessed as ranging from negligible to slightly adverse. Overall, the magnitude of change was assessed as extremely small in the majority of instances to small. Accordingly, although some negative impacts were anticipated to local residents and future occupiers as a result of the construction and operation of the development, in all instances the predicted significant of these effects were anticipated to be not significant subject to appropriate mitigation.

213. The current application is supported by an environmental compliance note prepared by Trium, dated March 2025, which considered whether the conclusions in the 2007 ES remain valid in the context of the proposed amendments. With the exception of demolition mitigation, Trium conclude that the secured mitigation, relating to dust, plant equipment, emissions reduction, and environmental monitoring, would still be valid. Further, Trium indicate that primary amendment relevant to air quality would be the change from a combined heat and power (CHP) system to electric air source heat pumps system. Due the transition from the CHP which would have relied on-site combustion to an all electric system, Trium consider the amendments would result in an improvement to operational emissions to air quality. On this basis, Trium have concluded that the conclusion of the 2007 ES remain valid in terms of air quality.

214. Officers note that, while no Air Quality Neutral assessment was received, the current Air Quality Neutral standards were not in place when the extant planning permission was considered and considering the scope of the amendments proposed, which maintain the general scale of the development, this was not requested in this instance. Officers agree with Trium's conclusion the amendment to the energy strategy are anticipated to result in improvements to air quality, and further officers highlight that the onsite parking provisions has reduced since the extant planning permission was approved. Overall, as the proposed amendment are anticipated to improve the scheme's performance in terms of air quality, the proposed amendments are considered acceptable in this instance and in general accordance with Policy SI1 of the London Plan and Policy P65 of the Local Plan in ensuring London's are quality is not deteriorated. Any short-term effects on air quality during construction will be successfully mitigated through the CEMP and environmental compliance conditions.

Basement impact

215. The current proposal in in part led by a need to redesign the basement in accordance with Thames Tideway Tunnel (TTT) infrastructure. These amendments are considered minimal as they follow a previously approved non-material amendment (Ref: 15/AP/3481 approved in 2015) which initially redesigned the basement around the TTT main shaft. In the ES compliance note, Trium have concluded that the basement amendments do not alter the conclusions reached in the 2007 ES.

216. TTT have been consulted and have no objection to the proposed amendments subject to a condition of consent securing detail of piling,

basement construction, and ground floor structures for buildings C and D. Thames Water have also requested conditions of consent to secure a piling method statement for approval and protection of water mains. Further, Thames Water have requested that an informative be added in regard to the applicant's requirements related to basement dewatering. The Environment Agency have been consulted and have no objection to the proposed amendments. In additional to environmental conditions, the basement and foundation designs have been secured for archaeological purposes as well. In light of the consultee responses received and subject to the recommended conditions of consent, officers consider any impacts arising from the amendments will be appropriately mitigated.

217. Subject to the approved conditions, the proposed amendments are therefore considered to accord with London Plan Policy D10 and Southwark Plan Policy P14.

Flood risk and drainage

218. 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. Concerns have been raised by neighbouring residents regarding increased risk of flooding and that the applicant has not submitted an updated flood risk assessment.

219. The site is located in Flood Zone 3 as identified by the Environment Agency flood map, which indicates a high probability of flooding, and the site contains land designated as a flood defence barrier with the Thames River. 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.

220. Paragraph 172 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 buildings used for dwellings including ground floor homes in buildings B, C, and D (22 units) which are classified as 'more vulnerable' uses under the NPPF.

221. 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.

222. The site is allocated for development in the Southwark Plan (NSP15 Site Allocation Chambers Wharf) and the development of housing, including ground floor housing, in this location is established by the approved planning permission which is cited in NSP15. Therefore, the applicants need not apply the sequential test again. However, the NPPF sets out that 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. Although the original planning permission was submitted in 2007, the site allocation was included in the current Southwark Plan 2022, which was adopted following the adoption of the London Plan 2021. Accordingly, officers consider that the suitability of the site for housing was considered and that recent information about existing or potential flood risk were taken into account at the planning making stage.

223. Regardless of the need to complete the exemption test, officers consider the development would be exempt if assessed as 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 and primarily housing in the Southwark Plan, and the proposed design is capable of providing good quality housing.

224. NPPF Paragraph 181 states:

> *When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment[63]. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:*
> *a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;*
>
> *b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;*
>
> *c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;*
>
> *d) any residual risk can be safely managed; and*

*e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.*

*[63] 63 A site-specific flood risk assessment should be provided for all development in Flood Zones 2 and 3. In Flood Zone 1, an assessment should accompany all proposals involving: sites of 1 hectare or more; land which has been identified by the Environment Agency as having critical drainage problems; land identified in a strategic flood risk assessment as being at increased flood risk in future; or land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use where its development would introduce a more vulnerable use*

225. As set out above, the NPPF confirms that a site-specific flood risk assessment should be provided for all development in Flood Zones 3. The original application was accompanied by a site specific flood risk assessment which was conditionally accepted by the Council. The applicant has proposed amendments to the fixed floor levels in Building C, however no amendments are proposed to the overall drainage strategy. As no amendments are proposed to the approved drainage strategy, the originally submitted drainage strategy remains consistent with approved development. The Lead Local Flood Authority and the Environment Agency have been consulted on the proposed development and have raised no objections subject to the development proceeding in accordance with the existing conditions and drainage strategy. Further, the GLA have been consulted and have confirmed that they consider the development does not give rise to any new strategic issues.

226. As set out above, Officers consider the development is in accordance the sequential and the exemption test. The LLFA and Environment Agency have raised no objections to the development and accordingly Officers consider that the development will be appropriately flood resistant subject to discharge of the recommended flooding conditions. Requirements for sustainable drainage systems were not initially imposed and have not been requested by the LLFA or Environment Agency. Officers consider that residual risk, including safe access and escape routes, can be can be adequately secured through the existing conditions which are set out below.

227. The relevant flooding and drainage conditions of consent attached to extant permission were amended under ref: 13/AP/4266. The relevant flooding and drainage condition attached to 13/AP/4266 are set out below. Further, an amended application was approved under ref: 15/AP/3481 permitting ‘changes to the basement floor level to accommodate new Thames Tideway Tunnel infrastructure passing through the site’. Ref 15/AP/3481 did not establish any further changes to the conditions but did establish 098 Revision P9 as the approved basement plan. Flood comments were received on 15/AP/3481 and confirmed no objection to the those amendments.

13/AP/4266 flooding and drainage related conditions:

7 Unless previously discharged, prior to the commencement of development of Phases A, B, C and D, the applicant shall submit to the Council a Method Statement for the removal of the jetty, to include a methodology for a survey of the foreshore beneath and adjacent to the jetty, and a watching brief for the period of the removal. This Method Statement shall be approved in writing by the Council, in consultation with the Port of London Authority and the Environment Agency, prior to any works in relation to the jetty taking place.

Reason
In order to protect the ecology of the foreshore in accordance with Strategic Policy 11 Open Spaces and Wildlife, Strategic Policy 13 High environmental standards of the Core Strategy (2011), saved Policies 3.28 'Biodiversity' and 3.29 'Development within the Thames Special Policy Area' of the Southwark Plan 2007

10 Unless previously discharged, before development commences on Phases A, B, C and D the following shall be submitted and approved in writing by the Local Planning Authority:
a) A full structural survey including intrusive testing of the condition of all of the river wall and its supporting elements that are being retained to demonstrate that these have or can be improved to achieve the same life expectancy as the development; and
b) A scheme of works for the formation of the proposed new flood defences and the replacement of all of the river wall and its supporting elements not demonstrated to be suitable for retention, along with the needed remedial works to improve retained elements as needed to achieve the same life-expectancy as the development.
The approved scheme submitted under b), shall then be implemented in strict accordance with the approved scheme prior to the occupation of any new buildings allowed under this permission.

Reason
To minimise the risk of flooding, ensure that the flood defence river wall has a life expectancy no less than that of the new development (which is taken to be 100 years as residential development is included) and for the benefit of wildlife.

11 Surface water drainage works shall be carried out in accordance with details submitted and approved under 12/AP/3004. The drainage works shall achieve a discharge to the combined sewer from surface water drainage no greater than 36 litres per second and comply with the following documents submitted subsequently to the original planning submission: - Hoare Lea report Chambers Wharf 0208374 Drainage Calculations Addendum January 2008 Estimated Allowable Flow Rate to Existing Combined Sewer dated 11 January 2008; and The Hand Amended Version dated 11/01/08, of Ian Simpson Architects drawing Titled GA Ground Floor Plan No. 100 rev. P10.

Reason
To ensure the development is designed safely in reference to flood risk in accordance with The National Planning Policy Framework 2012, Strategic Policy 13 High Environmental Standards of the Core Strategy 2011 and Saved Policy 3.9 Water of the Southwark Plan 2007.

13 Unless previously discharged, no development approved by this permission relating to Phases A, B, C and D shall be commenced until a detailed method statement for all works to the river including removal of the existing jetty have been approved by and implemented to the satisfaction of the Local Planning Authority.

Reason
To protect the ecological value of the River Thames and to ensure there are no negative impacts from the removal of the jetty and to prevent any increased risk of flooding.

28 Throughout the occupation of the development a flood evacuation / safe refuge plan will be maintained and implemented.

Reason
To ensure the development is designed safely in reference to flood risk in accordance with The National Planning Policy Framework 2012, Strategic Policy 13 High Environmental Standards of the Core Strategy 2011 and Saved Policy 3.9 Water of the Southwark Plan 2007.

29 The finished floor levels and entrance to the car parking will be set no lower than as shown on Ian Simpson Architects drawing GA Ground Floor Plan no. 100 p10 dated 04/05/07.

Reason
To ensure the development is designed safely in reference to flood risk in accordance with The National Planning Policy Framework 2012, Strategic Policy 13 High Environmental Standards of the Core Strategy 2011 and Saved Policy 3.9 Water of the Southwark Plan 2007.

30 All lighting and wind turbines located between the buildings and the new flood defence walls will be designed to be demountable such that the surface does not then have any protrusions proud of the ground.

Reason
To retain operational access to the tidal flood defences.

32 No infiltration of surface water drainage into the ground is permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters.

Reason:
Soils remaining on site may be contaminated and not suitable for infiltration.

33 Piling or any other foundation designs using penetrative methods will not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater.

Reason
Piling through contaminated soil poses a risk to underlying aquifers.

228. Condition 11 as approved under ref: 13/AP/4266, seems to have amended the previous surface water condition, condition 23 attached to 07/AP/1262. This changed the condition from requiring the submission of drainage strategy for approval to a compliance condition against an approved submission of details, 12/AP/3004. Officers consider this is an error as 12/AP/3004 relates only to phase 1 (which are the units to the south of Chambers Street) and does not include details of the units to the north of Chamber Street (Buildings A, B, C, and D and associated landscaping) which are the subject of the current proposals. Accordingly, officers recommend that the previous condition wording be reinstated and that the trigger be changed to 'prior to the comment of Blocks A, B, C, and D and associated landscaping'. Subject to these amendments, officers consider that the finalised drainage strategy will be robustly secured in general accordance with the extant planning permission and requirements of the development plan and NPPF. The revised condition wording is recommended as follows:

Revised condition 11 with additions shown in bold:

Condition 11 Surface water drainage works **for phase 1 of the development (Blocks F and G)** shall be carried out in accordance with details submitted and approved under 12/AP/3004.

**Prior to the commencement of Blocks A, B, C and D and associated landscaping, a drainage strategy detailing any on and or off site drainage works shall be submitted to and approved in writing by the Local Planning Authority for Blocks A, B, C and D and associated landscaping.** The drainage works shall achieve a discharge to the combined sewer from surface water drainage no greater than 36 litres per second and comply with the following documents submitted subsequently to the original planning submission: - Hoare Lea report Chambers Wharf 0208374 Drainage Calculations Addendum January 2008 Estimated Allowable Flow Rate to Existing Combined Sewer dated 11 January 2008; and The Hand Amended Version dated 11/01/08, of Ian Simpson Architects drawing Titled GA Ground Floor Plan No. 100 rev. P10.

**No discharge of foul or surface water from the site shall be accepted into the public systems until drainage works referred to**

**in the strategy have been completed and the development shall not be carried out otherwise than in accordance with any such approval given.**

Reason: **To minimise the potential for the site to contribute to surface water flooding in accordance with the National Planning Policy Framework (2024); Policy SI 13 (Sustainable drainage) of the London Plan (2021); Southwark's Strategic Flood Risk Assessment (2017) and Policy P68 (Reducing flood risk) of the Southwark Plan (2022).**

229. The river wall forms a statutory flood defence and a design for this feature has been approved separately as part of the Thames Tideway Development under ref: 22/AP/2017. The landscape plans submitted under this application have been amended in accordance with the river wall designs approved under 22/AP/2017 and are considered not to supersede 22/AP/2017. Accordingly, the proposals are considered acceptable in relation to the river wall as no amendments are proposed. The development approved under permission 22/AP/2017 is permitted granted it is begun three years from the approval of that permission on 08/06/2022. Officers understand that works to deliver this river wall have been implemented.

230. The applicant has requested that the conditions related to the jetty removal methods statement be removed as they consider these requirements have been superseded by the requirements imposed under the Thames Tideway Tunnel Development Consent Order. Officers agree these conditions are no longer relevant as 22/AP/2017 has been implemented and the jetty demolished. Officers note that the Environment Agency comments on 22/AP/2017 confirm that works near the river would require a Flood Risk Activity Permit (FRAP) under a separate process to planning (the Environmental Permitting (England and Wales) Regulations 2016)). An informative consistent with the informative attached to 22/AP/2017 has been recommended to support this.

231. Overall, subject to the recommend conditions of consent and informative, officers do not consider that the proposals would increase the risk of ground or surface water flooding at the site or elsewhere. Accordingly, officers consider the proposed development would be in accordance with the approved development and development plan.

**Planning obligations (S.106 undertaking or agreement)**

232. A S.73 application results in a new consent however any new consent issued will remain bound by the original S.106 Agreement signed initially under application 07/AP/1262 and amended by subsequent deeds of variation. The main expected changes to the s106 will likely include:

| Planning Obligation | Amount if relevant |
|---|---|
| Deliver & Service Bond - £2,790 in accordance with Draft CIL s106 SPD | 2,790.00 |

| | |
|---|---|
| Car club - Membership offer to first-occupier of each residential unit to be secured via the s106 agreement for a minimum of 3-years. Membership offer to first commercial operators of any commercial spaces within the proposed building for free for first 1-year. | |
| Access to CPZ Parking Permits will not be permitted for any use classes within the site, within any area of the borough in any existing or future CPZs. | |
| Membership to the Cycle Hire scheme for a minimum of 3 years, to be provided upon first occupation of any residential unit | |
| Any vehicles access arrangements into the site need to be agreed with Highways Development Management | |
| To support Southwark Council's effective monitoring of archaeological matters of £11,171 in accordance with our 'S106 Planning Obligations and CIL' SPD (page 19). | £11,171 |
| The application includes a revised energy strategy. There will be obligations to secure the proposed measures and monitoring obligations, as well as the revised carbon offset contribution of £280,207, subject to review. | £280,207 |
| • One job lasting a minimum 26 weeks for an unemployed Southwark resident per 500sqm GEA. Where this is not possible to meet this requirement, a charge of £4,300 per job not provided will be applied.<br>• One Southwark resident trained in pre or post employment short courses per 500sqm GEA. Where this is not possible to provide a payment a charge of £150 per resident will be applied.<br>• One new apprenticeship start or in work NVQ per 2000sq. Where this is not possible to provide a payment a charge of £1,500 per apprenticeship will be applied. | |
| • Public access to the children’s playspace.<br>• Maintenance arrangements.<br>• Delivery strategy for approval to set out the phased delivery of the public realm across the site.<br>• Provision of public access to the public realm.<br>• Limited closures to the public, including for paid events up to 20 days a year (no more than 5 in a month), including reference to the Public London Charter. | |
| Updates to s106 plans | |

| | |
|---|---|
| Other amendments as necessary to ensure appropriate functioning of the draft | |
| Commitment and provision to ensure Blocks F and G will not be subject to service change requirements associated with these amendments | |
| Total | £294,168.00 |

233. These obligations are necessary to make the development acceptable in planning terms, mitigating for its adverse impacts. In the event that a satisfactory legal agreement has not been entered into by 30 November 2025 it is recommended that the director of planning refuses planning permission, if appropriate, for the following reason:

*"The proposal, by failing to provide for appropriate planning obligations secured through the completion of a Section 106 Agreement, fails to ensure adequate provision of mitigation against the adverse impacts of the development through projects or contributions in accordance with Southwark Plan 2022 SP6, SP4, P23, P28, P50, P54, P53 Polices and London Plan 2021 Polices SI 2, S4, E11, T1, T4, T5, T9 and DF1"*

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

234. In terms of Mayoral and Southwark CIL, this application for minor material design amendments does not alter the levy liability. As such the application is still bound to the CIL liability.

235. Both the Mayor of London and LBS have adopted CIL charging schedules. In LB Southwark, the Mayor's Levy is £60 per sqm (plus indexation) for all relevant land uses.

236. The Site falls within LB Southwark's CIL Charging Zone 2. There is a £218 per sqm charge for residential development and there is a £136 per sqm charge for all retail uses.

237. The Proposed Development is expected to generate a significant MCIL contribution, as well as an LBS CIL contribution (subject to indexation and confirmation of applicable reliefs/exemptions). The gross estimated CIL charge at this stage is £493,564.16. It should be noted that this is an estimate, floor areas will be checked when related CIL Assumption of Liability is submitted after planning approval has been secured.

238. For the purposes of CIL, this application proposes a 'phased' development, as set out in the previous CIL phasing NMAs.

**Community involvement and engagement**

239. This application was accompanied by a cover letter which includes a statement of community involvement. In summary, the document confirm that the following public consultation was undertaken by the applicant prior to submission of the application:

- St James has also had extensive conversations with the TTT team to

understand key local stakeholders and their consultation strategy to date, and appointed engagement consultant Iceni Projects to support the process.

- Project team met with local ward councillors, briefing them on the project, process and outlining the approach to engagement;.
- Local groups, resident associations and schools were also contacted by email, with meetings offered to those closest to the site. This includes Cherry Garden Tenants and Residents Association and Dickens Estate TRA.
- A leaflet drop was undertaken covering c.1,400 addresses via Royal Mail, in a 250m radius from the site, following the same radius as the TTT communications to date.
- Leaflets were hand delivered to those living closest to the site, including Chambers Wharf Phase 1 and Fountain Green Square, to enable any chance discussions with key neighbours.
- The leaflet advertised a drop-in at the Old Justice pub, which ran from 3 p.m. until 7.15 p.m. on the 13th of May. A team of 5 staff, including a representative from the architectural team, were on hand to talk to attendees. Exhibition boards showing the scheme in the context of the wider area, a plan illustrating heights, a phasing plan, a series of indicative CGIs including one of the riverside walk, together with a timeline for delivery.

240. The applicant summaries the following outcomes and key themes raise as follows:

- Following the leaflet distribution and in advance of the drop-in, Iceni received one email and a phone call, asking for details of the properties.
- Around 40 people attended the in-person drop-in including two ward councillors and two members of the TTT team.
- The vast majority who attended were aware of the project and the 2014 permission.
- There was widespread support for the opening of the riverside walk with attendees keen to understand how quickly this could be delivered and understand more about the look and feel of the space.
- Attendees were also keen to understand what elements of the public realm shown on the plans were open to the public generally.
- Attendees asked the team to outline the changes to the scheme and for clarity on heights.
- Some of those living closest to the site (Fountain Green Square) asked about timescales for construction, referencing the impact of construction of the TTT to date in terms of noise disturbance, expressing concern about the continued disruption and proximity to their homes.
- Several attendees asked about the potential for a Thames Clipper stop on this part of the river.

241. The applicant has also provided a completed equalities impact assessment template in relation to the Council's development consultation charter requirements.

242. As part of its statutory requirements, the council, 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 re-consultation undertaken by the local planning authority in respect of this application are set out in the appendices. The responses received are summarised later in this report.

**Consultation responses, and how the application addresses the concerns raised**

**Consultation responses from members of the public**

243. The consultation undertaken and lists of those who responded are set out in Appendix 4 and Appendix 5. The later "Community involvement and engagement" and "Consultation responses" sections of this report summarise the responses in more detail.

244. The application was initially submitted as a non-material amendment application under reference 24/AP/1547 which was withdrawn by the applicant and replaced by application 24/AP/3800 (s96a to amended the description of development) and 24/AP/3801 (s73 for amendments considered in this report). The public comments submitted under reference 24/AP/1547 were carried across to application 24/AP/3801 and residents were made aware of this when neighbour consolation letters were issued on initially on 21/01/25 after the application was made valid, and this included confirmation comments from 24/AP/1547 would be considered. Site notices were posted in the local area, a press notice was also published, and consultation letters sent to internal council teams and external consultees. As the application includes environmental information, the consultation period ran for at least 30 days. Following the receipt of further information, a further round of public consultation was completed form 19/03/2025 with public consultation letters issued to residents summarising the further information received. Site notices were posted in the local area, a press notice was also published, and consultation letters sent to internal council teams and external consultees. As the application includes environmental information, the consultation period ran for at least 30 days. Following the receipt of further information in response to issued raised by local objectors, neighbour consultation letters were issued on 03/06/2025 for a 14-day consultation period. As further updated information was submitted by the applicant, officers issued a further update by email to those who had previously commented on the application, and this extended the consultation period by a further 14 days. The consultation responses received under ref 24/AP/1547 and ref 24/AP/3801, as well as any comments received under 24/AP/3800, have been taken into account and are summarised below at the time of writing. Any further comments received prior to the scheduled planning committee will be reported to members of the planning committee.

245. Comments received under 24/AP/1547:
38 comments (3 previous/repeat submitters and 2 comments with no name or address) were received through the Council's planning register.
Additionally, the following document was received and published on the Council's planning register at the request of objectors:

- RIGHT OF LIGHT CONSULTING - LETTER 28.11.2024

The comments received were published on the planning register under 24/AP/3801.

Comments received under 24/AP/3801:
28 comments (from 10 previous/repeat submitters and 2 comments with no name or address) were received through the Council's planning register
Additionally, the following documents were received and published on the Council's planning register at the request of objectors:

- RIGHT OF LIGHT CONSULTING - LETTER 28.11.2024
- ADDITIONAL DOC FOR PLANNING REGISTER 1
- ADDITIONAL DOC FOR PLANNING REGISTER 2
- ADDITIONAL DOC FOR PLANNING REGISTER 3
- Letter of Objection (Prepared by Neighbouring Residents April 2025)
- LETTER OF OBJECTION - ADDITIONAL DOC FOR PLANNING PORTAL 5
- LETTER OF OBJECTION - ADDITIONAL DOC FOR PLANNING PORTAL 6
- LETTER OF OBJECTION - ADDITIONAL DOC FOR PLANNING PORTAL #7 RE WAREHOUSES.
- RIGHT OF LIGHT CONSULTING - LETTER 17.04.25
- ADDITIONAL DOC FOR PLANNING REGISTER 9.4.PDF

Where there has been extended correspondence with residents, this is not reported as further individual objections and as requested the above documents were uploaded to the Council's planning register and considered in the assessment of this application.

A further objection was received in writing from St Michael's Catholic College and is considered below.

Comments received under 24/AP/3800
0 comments

**Objecting comments**

246. The objections received from the public raised the following summarised topics in the objection comments.
<u>Objection due to amenity concerns</u>

- Impacts to neighbouring properties and consequent impacts on quality of life (as a result of loss of sunlight, daylight, overshadowing, noise and privacy impacts)
- Increased energy consumption due to need to rely on more electric lighting
- Increased need for light given increasing trends in home working
- Objection as wellbeing on existing community not considered
- The use of the roof garden is likely to create noise disturbance
- The proposed rooftop plant area poses a significant risk of noise disturbance to neighbouring residential buildings and limits opportunities for passive cooling and natural ventilation through open windows at neighbouring development
- Objection due to restriction of views

- No compensation has been offered or proposed for the loss of light
- Concern with sunlight impacts due to vitamin d deficiency as a result of being a woman of South Asian descent
- Objection due to the characterisation of sunlight and daylight results as not significant to Axis Court in the 2007 Environmental Statement results
- The applicant appears to rely on the exiting warehouses on data from the original warehouse which was much lower and smaller to assess the light loss
- Objection due to noise from rooftop garden

Officer comments: Amenity impacts have been considered in full in this report and are considered acceptable on balance subject to the imposition of the recommended conditions of consent, including in relation to controlling noise emissions. Right to light and compensation for amenity impacts are considered as a sperate legal process and are not a material planning consideration. The final sunlight and daylight study has been assessed by a third party consultant on behalf of the Council who consider the methodology and baseline used appropriate. In relation to rooftop level amenity, the majority of the roof will be either brown extensive roof or green extensive roof and no communal amenity spaces are proposed at roof level (see section 3.9.4 of the design and access statement). Private amenity spaces in the form of balconies and winter gardens are proposed which is similar to the existing scheme.

<u>Objection to design and impacts on character, heritage, and conservation</u>

- Out of keeping with existing character, particularly in relation to heigh increase
- Increased visual intrusions and a sense of enclosure
- Lack of matching height with Axis Court and Luna House
- Objection to proposed facade materials due to increased visual dominance compared to the approved materials
- Concerns raised with the quality and durability of materials
- Objection due to failure to preserve the warehouse look along this section of the Thames
- undermines the quality of the built environment in this key part of London including in relation to Tower Bridge and the Tower of London UNESCO World Heritage Site
- Objection as scheme does not adequately consider proximity to buildings of architectural and historic value, celebrates its rich heritage and iconic setting (including views of Tower Bridge)
- Insufficient place making in terms of recognising local vernacular and heritage
- Objection due to lack architectural quality and distinctiveness which does not appropriately respond to river front location
- The external envelope should be full height glazing (Curtain walling) as per the original consented scheme
- proposed elevation facing Chambers Street fails to respond sensitively to the established character of the area including warehouse architecture
- Impact on long-range views from Luna House (cumulative erosion of

visual connections to the riverfront and wider London skyline which impacts amenity and openness of the area)
- Design of public and semi-public spaces does not appear to adequately address these risks in line with Secured by Design principles
- massing and façade articulation appear to lack coherence with the local urban fabric appearing incongruous and poorly integrated
- Contradiction of Southwark Council planning policies in relation to approach to height and massing
- Undermines 2008 reductions in building heights resulting from democratic consultation.
- The submitted date for sunlight impacts differs from the data considered in 2010.

Officer comments: Design, heritage, and conservation impacts have been assessed in full in this report and are considered acceptable subject to the recommended conditions of consent.

247. Insufficient Green and Recreational Spaces and trees and inadequacy of the Thames Pathway design

- Objection due to negative impacts on public realm, including reducing potential interaction by local residents and Thames Path (and lack of active frontage on the Thames Pathway)
- increased footway encroachment on Chambers Street
- Objection to fenced private amenity spaces which was not a feature of the original permission
- Objection as plan shows that St James intend to build on the original footpath and overhanging into the original road.
- Careful consideration should be given to the public realm
- Is it possible to remove the pinch point at the east of the proposed riverside walk where it joins Cherry Gardens by allowing the developer to go a little further into the river so the proposed indentation is removed.
- Can further tree planting be considered
- it is not clear on the plans that there will be an uninterrupted river walk in front of the development

Officer comments: The landscape strategy remains largely unchanged from the consented potion. In accordance with the extant consent, final landscape details would be secured by condition and further tree planning and improvements to the Urban Greening Factor have been secured by condition. The layout of the river wall is secured by a separate consent (22/AP/2017) which has been implemented, and the submitted landscape plans have been amended to show this approved layout. The river walk adjacent to the Thames is secured as public space in the existing s106 agreement and this would not change as a result of the proposed amendments.

248. Increased Traffic and Parking Issues and concern with design

- objection due to increased density as a result of significantly increase local footfall, parking demand, and pressure on services-all without

proper planning for infrastructure.
- Insufficient provision in the design for vehicle charging

Officer comment: The principle of a 589 unit scheme on this site is established by extant planning permission. The number of units will be reduced by 23 units and accordingly the anticipated impacts to the network are considered in lien with the existing approval. Highways matters and parking design have been considered in full in this report and electric changing provisions have been secured by condition.

249. Objection due to lack of information and or lack of consultation
- Concern with level of consultation undertaken for extant planning permission
- Lack of clarity or contradictions in plans
- Request that the proposal be subject to a full public review with updated impact assessment
- Unclear that heights were increasing as developer indicates number of storeys not increasing
- drawings of sections did not show representative height differences between Axis Luna and Building A
- Full sunlight and daylight assessment not submitted under were not submitted in application 24/AP/1547
- Lacking visualisation from residents' windows, along Chambers Street, and aerial views and does not show neighbouring properties in all views
- Lacking wind analysis
- Lacking overshadowing assessment
- uses temporary Tideway structures as the 'existing' baseline in light studies
- Concern original estimates of light impact on adjacent properties was flawed
- Limited time to respond to consultation and concern that timing of January 2024 submission limited opportunities for public engagement
- substantially different from the models and plans we were shown by the developers at an earlier exhibition
- Application includes subjective statements

Officer comment: Further information has been submitted through the course of processing the application, including in relation to modelling the sunlight and daylight assessment against the original baseline data and provision of further visual and heritage assessment. Officers are content that sufficient information is available in this instance to assess the impacts of the proposed amendments. Wind and overshadowing impacts are discussed in full in this report.

250. Objection as planning permission no longer considered implementable
- Objection as considered CHAWF (Thames Tideway Tunnel DCO) superseded Chambers Wharf permission planning permission
- Objection due to time which has passed since initial approval

Officer comment: The existing permission has been partially implemented and

has been delayed due to the construction of the Thames Tideway Tunnel. Amendments have been approved by the Council to account for the presence of the required Thames Tideway Tunnel infrastructure and equipment on the application site.

251. Objection due to consideration under s96a and request that the matter be considered at Planning Committee

Officer comment: The proposal is to be considered by the Council's planning committee.

252. Objection in relation to construction impacts including in relation to heightened sensitive at this due to the duration and intensity of works on site following the Thames Tideway development.

- Respite should be offered to residents near the site and is not mentioned in the application documents

Officer comment: The sensitivity of this site is noted and additional conditions of consent including a construction environmental management plan have been secured to further mitigate construction impacts.

253. Affordable Housing

- Objection due to lack of social housing on site which objectors consider is an equality issue
- Concern viability should be revisited

Officer comment: Affordable housing for this scheme has already been delivered

254. Development mix and housing quality

- Objection to increase in studio and one bedroom flats, which are 14% and higher than the 5% maximum required by Southwark Council.
- One bedroom flats like to be bought by buy to let landlords
- Objection due to sunlight and daylight performance of proposed scheme

Officer comment: Housing mix and quality requirements are considered in full in this report.

255. Objection to the private amenity space (including pool and gym))

- Objection in the context of the increased height and light impacts to Building A, this should be removed to reduce height of building A.
- Objection due to increase of service charge as a result of the introduction of the swimming pool.

Officer comment: No objection is raised to the principle of the additional amenity spaces for residents and this is considered in full in this report.

256. Objection to reduction of size of commercial units

- Too small for a grocery store
- Fails to incorporate meaningful ground floor commercial space, particularly units that could support small and medium-sized enterprises (SMEs)

- leaves the ground floor underutilised and does not maximise the site's potential in line with local planning objectives for mixed-use development and active street frontages

Officer comment: The reduction in commercial space is considered in full in this report and overall officers raise no objection to the amendments to the quantity of commercial space.

257. Objection as two staircores are only proposed on 18m+ buildings

Officer comment: The application has been assessed by the Health and Safety Executive and London Fire and Emergency who have raised no objection in terms of the planning stage plans and strategy. Compliance with submitted fire safety materials is secured by condition.

258. Objection in relation to sustainability

- Overheating has not been adequately considered
- Objection to loss of CHP / GSHP and replacement with ASHP

Officer comment: Sustainability matters are assessed in full in this report. Subject to the recommended condition of consent and planning obligation, officers consider the amendment are an improvement of the extant planning permission and that the development will be acceptable in regard to energy performance and sustainability.

259. Objection due to Building D overhanging the Thames Tideway Tunnel due to potential for odour and H2S (hydrogen sulphide) impacts on future residents residing within blocks

Officer comment: The Council's Environment Protection officer has been consulted and has advised that the Tideway ventilation column itself is outside the scope of 24/AP/3801. The column is already consented by the Thames Tideway DCO and a detailed LBS consent for appearance. The odour risk and air treatment is covered by the Tideway DCO PW7 requirement and we have previously commented on this under LBS Ref: 24/AP/1176 - Discharge of (Air Management Plan).

We are satisfied that no significant adverse effect is likely from this ventilation column on the proposed dwellings in 24/AP/3801 or on users of public or private amenity space or the Thames path as long as the ventilation is operated as approved via the DCO PW7. This column is primarily an air inlet (for over 99% of the time), not an outlet, and for the tiny proportion of the time it does outlet, aside from during an extreme event it is subject to a full air monitoring and air treatment system including for Hydrogen Sulphide.

260. Other comments

- building work should start as soon as possible since this scheme has taken a very long time to get to where it is.
- I support the high quality amenities for the building occupants such as the proposed swimming pool and gym, and I would support additional similar amenities.

- I am delighted to see that the fire safety is being improved, in particular the addition of more staircases.

261. *St Michael's Catholic College*

We would object to any works that would disrupt the school due to increased noise levels during public examinations from the start of May to the end of June 9am-5.30pm each year. Examinations take place in the sports hall which is directly opposite Chambers Wharf. JCQ exam regulations require minimum noise levels and we have no other venue available at our school site.

It must be ensured that public pathways on Chambers Wharf and Llewellyn Street are not closed as they are the school's evacuation routes to our muster point in front of Wrayburn House.

Officer comment:
The applicant has agreed to accommodate the School's requests and confirmed that we would ensure that all sensitive receptors such as this would be carefully mitigated through the detailed CMP that will be secured under conditions. Further, the applicant advised that the contractor will liaise with the local community including the school prior to the CMP being issued. These requested accommodations have been included in the recommended conditions of consent.

**Consultation responses from external consultees**

262. **London City Airport**
Summary: No conflict identified

Officer comment: Noted

263. **Environment Agency**
Summary: We have no objection to the planning application as submitted.

Officer comment: Noted. Existing environmental planning conditions have been retained or updated where relevant as discussed in full report.

264. **HSE Fire Risk Assessments**
Summary: 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.

Officer comment: Noted. The recommended conditions secure that the development hereby approved shall be carried out in accordance with the recommendations of the Gateway 1 Fire Statement (FDS Consult UK, Project Number 8198, Issue 6) and therefore the development is considered in accordance with policies D5 (Inclusive design) and D12 (Fire safety) of the London Plan (2021).

265. **London Fire & Emergency Planning Authority:**
Summary: The London Fire Brigade (LFB) has been consulted with regard to the above-mentioned premises and have no further observations to make. It

should be ensured that if any material amendments to this consultation is proposed, a further consultation may be required.

Officer comment: Noted. Compliance with the submitted Gateway 1 Fire Statement is secured by condition.

266. **Port Of London Authority:**

**Summary:**
To confirm the PLA has no objection to the proposed amendments to the scheme.

To note within the submitted Construction Environmental Management Plan (CEMP) under section 3.3 (construction works) it is stated that the use of barges will be considered to remove excavated material during detailed discussion with contractors as part of the procurement period. With regard to this to highlight further information will be required as part of the required discharge of condition 17 of planning permission 07/AP/1262 on the use of the river as part of the construction stage of the development.

Officer comment: Noted. A CEMP is included in the recommended conditions of consent and Condition 6 attached to 13/AP/4266 (river transport feasibility study), which superseded condition 17 of planning permission 07/AP/1262, will be retained.

267. **Transport For London:**
Summary of comment:
Healthy Streets
TfL request for an ATZ and Night-time ATZ to be undertaken to ensure compliance with London Plan policies T2 (Healthy Streets) and T4 (Assessing and mitigating transport impacts).

Cycling
Updated plans should be provided prior to determination and design amendments may be required.

Car Parking

A significant reduction in car parking is required to align with Policy T6 and recommended to provide a development more aligned with the Healthy Streets indicators in Policy T2.

Trip Generation
We request that the expected trip generation is provided prior to determination.

Delivery and Servicing

We recommend that a Delivery and Servicing Plan is secured through condition to align with Policy T7.

Construction
Construction Logistics Plan (CLP) prior to determination, with a full CLP secured through condition (in line with Policy T7).

Travel Plan
A full Travel Plan should be secured through condition.

Conclusion
Amendments to the car and cycle parking provision are required to align with London Plan policy. Further information in an ATZ assessment, cycle parking design, delivery and servicing and construction are required for assessment prior to determination in order to assess compliance with London Plan policy.

Applicant response:

| | |
|---|---|
| | ATZ - We scoped the deliverables pre-submission and agreed that this would not required for the submission. We are happy though for these details to be conditioned. |
| | Cycle Parking - We have dealt with the cycle parking as best as we can at this stage given this is a s73 to an approved scheme. LBS highways are satisfied with the details and we can cover the actual design/detail of the cycle parking through conditions. |
| | Car Parking - We are not removing car parking through this s73. |
| | Trip Generation - We agreed that this level of detail was not required for the s73 and that we could rely upon the consented and as built scheme. |
| | D&SP – Agree to condition |
| | CEMP - We are not at the stage of providing a more detailed CEMP at this stage and this has been discussed with officers previously. We are happy to agree to the CEMP under condition |
| | Travel Plan – Agree to condition |

This response and the request to secure the above requirements by condition was sent to TfL on 17 February 2025. A follow up email was sent to TfL on 4 April 2025 confirming that officers would proceed with securing these matters by condition as no response was received from TfL. No further response has been received from TfL at the time of writing.

All of the above requirements (cycle parking, Delivery and Service Management Plan, Construction Environmental Management Plan (CEMP), and Travel Plan) have been secured by condition with the exception of ATZ requirements as this did not apply at the time the initial planning permission was approved.

268. **Thames Tideway Tunnel:**

**Summary:**
We request that any forthcoming planning permission includes the following condition. Condition: Details of piling, basement construction and ground floor structures for buildings C and D.

269. **Thames Water:**
No objections subject to conditions.

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270. **Greater London Authority**
Summary: The GLA have assessed the details of the application and, given the scale and nature of the proposals, conclude that the amendments do not give rise to any new strategic planning issues.

Officer comment: Noted.

271. **Historic England**

On the basis of the additional visual information provided, we confirm that we do not wish to comment, and are content for you to rely on advice from Southwark Council Design and Conservation.

Officer comment: Noted.

**Consultation responses from internal consultees**

272. **Highways Development & Management**

Summary:
No objection to footpath widths

Officer comment: Noted

273. **Ecology**

**Summary:**
The application site is adjacent to the River Thames and tidal tributaries Site of Importance for Nature Conservation (SINC).
Although not subject to mandatory BNG, a metric has been provided which

demonstrates a gain for biodiversity.
The proposed green roofs should include a varied substrate with a varied depth of 80mm-150mm. The roofs should be seeded and plug planted with wildflower species and meet the requirements of GRO Code 2014.
Soft landscaping should include native and pollinator friendly shrub and herbaceous planting. The use of nectar-rich and berry producing plants will provide habitat for a wide range of insects, birds and mammals. Where possible, larger shrubs should be under-planted to create greater structure and cover for wildlife. The use of block planting of single species should be avoided in favour of a higher diversity of plant types per square metre. At least 60% of the species used within planting areas should be on the RHS plants for pollinators list.

Recommend condition:
- -CEMP
- -Native planting
- -Green roof
- -bat boxes x 4
- -Bird boxes x 6
- -Wildlife friendly lighting

Recommended informative:
- -Nesting birds

Officer comment: Officer not that the ecology officer has raised no objection subject to the recommended conditions of consent. The recommended condition and informative have been included as part of this recommendation.

274. **Flood Risk Management & Urban Drainage Team (Lead Local Flood Authority (LLFA))**

Summary: No objection as no amendments have been proposed to flood management

Officer comment: The LLFA's comments are noted and are supported through amendments to the extant conditions as discussed in full in this report.

275. **LBS Urban Forester**
Although there is an increased amount of brown and extensive green roof there does not appear to be an assessment of how landscaping is affected nor the UGF, previously 2.9.

Minor improvements to attain the full compliant score should be considered via the provision of trees planted in connected tree pits.

Officer comment: Officer note that the landscape plan has not been amended as part of the current proposal as final landscape plans have been secured on the extant planning permission by condition. Further, Officers not that local residents have objected to the lack of trees on Chambers Street. To support the comments of the Urban Forestry officer and to address the concerns of local residents, an enhanced UGF including through enhanced tree planning on Chambers Street if possible has been secured as part of the updated landscape design condition.

**LBS Archaeology**

No objection and recommend conditions.

**Community impact and equalities assessment**

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

277. The Council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.

278. 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.

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

280. There are a range of potential impacts on the local community during construction and operation. Potential impacts in terms of infrastructure, environmental factors, amenity, accessibility, housing, employment creation and health have been discussed in detail in the relevant sections of this committee report and any necessary mitigation to limit adverse impacts has been secured through s106 obligations and planning conditions (for example construction impacts will be minimised through the use of a CEMP).

281. This application would deliver 10% provision of wheelchair accessible homes Part M4(3), with the remainder achieving Part M(4)2 (calculated by habitable room), increasing the provision of accessible and adaptable dwellings within this area. Further, the scheme will provide 5% widely space cycle parking

stands and 56 blue badge parking spaces. Final details of access gradients have been secured by condition to ensure appropriate access for wheele chair users. While not a feature of this amendment application, Phase 1 of the development has deliver 182 affordable housing units contributing to affordable housing which provide enhance access to affordable residential accommodation for those with protected characteristics, in particular BAME communities as they are disproportionately affected by lack of access to affordable housing. part M. There will also be positive health benefits in terms of enhanced public realm and landscaping works provide by the improved Thames pathway and connections to this through the site. The positive impacts arising from the development would benefit those groups with protected characteristics as well as the wider community.

282. Officers are satisfied that equality implications have been carefully considered throughout the planning process and that Members have sufficient information available to them to have due regard to the equality impacts of the proposal as required by Section 149 of the Equality Act 2010 in determining whether planning permission should be granted.

**Human rights implications**

283. 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.

284. This application has the legitimate aim of redeveloping this site for a range of mixed-use buildings comprising office, workspace, cultural, retail/café floorspace and residential units together with publicly-accessible realm. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

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

**Conclusion**

285. The proposed amendments to the consented scheme allow the site to continue to provide substantial public benefits, stemming from a mixed-use redevelopment of an existing under-utilised brownfield site, which in turn

makes a significant contribution to delivering the vision and objectives of the development plan.

286. It is recognised that there would continue to be some degree of harm to surrounding residential amenity (as was the case under the original permitted development) but that harm is relatively limited beyond what has been consented.

287. The proposed development would deliver a high quality residential led development together with residential amenity spaces, public realm including additions to the Thames Pathway, and improved street tree planting offered on Chambers Street. Overall the amendments sought and the delivery of housing on this site are considered in accordance with the Policies of the Southwark Plan 2022 Site Allocation NSP15. The principle of redevelopment (as amended) is therefore still strongly supported.

288. It is therefore recommended that Members grant permission, subject to conditions as set out in the attached draft decision notice, referral to the GLA, and the timely completion of a Section 106 Agreement.

## BACKGROUND INFORMATION

## BACKGROUND DOCUMENTS

| Background Papers | Held At | Contact |
|---|---|---|
| Site history file:<br>Application file: 24/AP/3801<br>Southwark Local Development Framework and Development Plan Documents | Resources Department, attention Strategic Planning Applications, 160 Tooley Street London SE1 2QH | Planning enquiries telephone: 020 7525 5403<br>Planning enquiries email: planning.enquiries@southwark.gov.uk<br>Case officer telephone: 0207 525 0254<br>Council website: www.southwark.gov.uk |

## APPENDICES

| No. | Title |
|---|---|
| Appendix 1 | Recommendation (draft decision notice) |
| Appendix 2 | Relevant planning policy |
| Appendix 3 | Consultation undertaken |
| Appendix 4 | Consultation responses received. |

**AUDIT TRAIL**

| | |
|---|---|
| **Lead Officer** | Steve Platts, Director of Planning and Growth |
| **Report Author** | Andy Sloane, Senior Planning Officer |
| **Version** | Final |
| **Dated** | 22 June 2025 |
| **Key Decision** | No |

| **CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER** | | |
|---|---|---|
| **Officer Title** | **Comments Sought** | **Comments included** |
| Strategic Director of Resources | No | No |
| Strategic Director of , Environment, Sustainability and Leisure | No | No |
| Strategic Director of Housing | No | No |
| **Date final report sent to Constitutional Team** | | 23 June 2025 |

**Appendix 1**

# Recommendation

This document shows the case officer's recommended decision for the application referred to below.

This document is not a decision notice for this application.

---

| | | | |
|---|---|---|---|
| **Applicant** | C/O Agent | **Reg. Number** | 24/AP/3801 |
| **Application Type** | S.73 Vary/Remove Conds/Minor Alterations | | |
| **Recommendation** | AGREE variation | **Case Number** | 24/AP/3801 |

**Draft of Decision Notice**

**The variation is AGREED for the following development:**

**In accordance with application received on** 5 October 2023 **and Applicant's Drawing Nos.**:

Existing Plans

Proposed Plans

Other Documents

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

**Appendix 2**

# (Relevant policies and guidance)

**National Planning Policy Framework (the Framework) 2023**

The revised National Planning Policy Framework ('NPPF') was published December 2023 and sets out the national planning policy and how this needs to be applied. The NPPF focuses on sustainable development with three key objectives: economic, social and environmental.

Paragraph 218 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications.

- Chapter 2 Achieving sustainable development
- Chapter 5 Delivering a sufficient supply of homes
- Chapter 6 Building a strong, competitive economy
- Chapter 7 Ensuring the vitality of town centres
- Chapter 8 Promoting healthy and safe communities
- Chapter 9 Promoting sustainable transport
- Chapter 10 Supporting high quality communications
- Chapter 11 Making effective use of land
- Chapter 12 Achieving well-designed places
- Chapter 14 Meeting the challenge of climate change, flooding and coastal change
- Chapter 15 Conserving and enhancing the natural environment
- Chapter 16 Conserving and enhancing the historic environment

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

- Policy SD1 - Opportunity Areas
- Policy SD4 - The Central Activities Zone (CAZ)
- PolicySD5 - Offices, other strategic functions and residential development in the CAZ
- Policy SD6 - Town centres and high streets
- Policy SD7 - Town centres: development principles and Development Plan Documents
- Policy D1 - London's form, character and capacity for growth
- Policy D2 - Infrastructure requirements for sustainable densities
- Policy D3 - Optimising site capacity through design-led approach
- Policy D4 - Delivering good design
- Policy D5 - Inclusive design
- Policy D6 - Housing quality and standards
- Policy D7 - Accessible housing
- Policy D8 - Public realm
- Policy D9 - Tall buildings

- Policy D10 - Basement development
- Policy D11 - Safety, security and resilience to emergency
- Policy D12 - Fire safety
- Policy D14 - Noise
- Policy H1 - Increasing housing supply
- Policy H4 - Delivering affordable housing
- Policy H5 - Threshold approach to applications
- Policy H6 - Affordable housing tenure
- Policy H10 - Housing size mix
- Policy S4 - Play and informal recreation
- Policy E1 - Offices
- Policy E2 - Providing suitable business space
- Policy E3 - Affordable workspace
- Policy E9 - Retail, market and hot food takeaways
- Policy E11 - Skills and opportunities for all
- Policy HC1 - Heritage conservation and growth
- Policy HC2 - World Heritage Sites
- Policy HC3 - Strategic and Local Views
- Policy HC4 - London View Management Framework
- Policy G4 - Open space
- Policy G5 - Urban greening
- Policy G6 - Biodiversity and access to nature
- Policy G7 - Trees and woodlands
- Policy SI 1 - Improving air quality
- Policy SI 2 - Minimising greenhouse gas emissions
- Policy SI 3 - Energy infrastructure
- Policy SI 4 - Managing heat risk
- Policy SI 5 - Water infrastructure
- Policy SI 6 - Digital connectivity infrastructure
- Policy SI 7 - Reducing waste and supporting the circular economy
- Policy SI 12 - Flood risk management
- Policy SI 13 - Sustainable drainage
- Policy T1 - Strategic approach to transport
- Policy T2 - Healthy Streets
- Policy T3 - Transport capacity, connectivity and safeguarding
- Policy T4 - Assessing and mitigating transport impacts
- Policy T5 - Cycling
- Policy T6 - Car parking
- Policy T6.1 - Residential parking
- Policy T6.2 - Office parking
- Policy T6.3 - Retail parking
- Policy 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, visions and site allocations are:

- AV.02 Bankside and the Borough area vision
- NSP07 Landmark Court (site allocation)
- P1 Social rented and intermediate housing
- P2 New family 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
- P19 Listed buildings and structures
- P20 Conservation areas
- P21 Conservation of the historic environment and natural heritage
- P22 Borough views
- P23 Archaeology
- P24 World Heritage Sites
- P26 Local List
- P28 Access to employment and training
- P30 Office and business development
- P31 Affordable workspace
- P33 Business relocation
- P35 Town and local centres
- P39 Shop fronts
- P44 Broadband and digital infrastructure
- P45 Healthy development
- P46 Leisure, arts and culture
- P49 Public transport
- P50 Highway impacts
- P51 Walking
- P53 Cycling
- P54 Car parking
- P55 Parking standards for disabled people and the physically impaired
- P56 Protection of amenity
- 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.

**Planning Guidance**

In addition to the statutory Development Plan, the following documents are considered potentially relevant and material in determining the planning application:

National Guidance

- National Planning Practice Guidance (PPG)
- Nationally Described Space Standards
- National Design Guide

Strategic Guidance (GLA)

- Accessible London - Achieving an Inclusive Environment SPG (2014)
- Affordable Housing and Viability SPG (2017) together with two recently published draft London Plan Guidance documents in respect of Affordable Housing and Development Viability (May 2023)
- Be Seen Energy Monitoring LPG (2021)
- Character and Context SPG (2014)
- Circular Economy Statements LPG (2022)
- Energy Assessment LPG (2022)
- Energy Planning Guidance (2020)
- Housing SPG (2016) and Housing Design Standards LPG (2023)
- London View Management Framework SPG (2012)
- Optimising Site Capacity: A Design-Led Approach LPG (2023)
- Play and Informal Recreation SPG (2012)
- Public London Charter LPG (2021)
- Social Infrastructure SPG (2015)
- The control of dust and emissions in construction SPG (2014)
- Whole Life-Cycle Carbon Assessments LPG (2022)

Local Guidance (LBS)

- Affordable Housing SPD (2011)
- Design and Access Statements SPD (2016)
- Development Viability SPD (2016)
- Residential Design Standards SPD (2011, as amended 2015)
- Section 106 and CIL SPD (2020)
- Southwark Heritage SPD (2021)
- Sustainability Assessments SPD (2009)
- Sustainable Design and Construction SPD (2009)

**Appendix 3**

## Consultation undertaken

**Site notice date:**
**Press notice date:**
**Case officer site visit date:**
**Neighbour consultation letters sent**:

**Internal services consulted**

**Statutory and non-statutory organisations**

**Neighbour and local groups consulted:**

**Re-consultation:**

**Appendix 4**

# Consultation responses received

**Internal services**

**Statutory and non-statutory organisations**

**Neighbour and local groups consulted:**

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**OPEN** **MUNICIPAL YEAR 2025-26**

**COMMITTEE:** **PLANNING COMMITTEE (MAJOR APPLICATIONS) A**

**NOTE:** Original held in Constitutional Team; all amendments/queries to Gerald Gohler, Constitutional Team, Tel: 020 7525 7420

## OPEN

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| Councillor Gavin Edwards | 1 | | |
| Councillor Darren Merrill | 1 | | |
| Councillor Reginald Popoola | 1 | | |
| Councillor Catherine Rose | 1 | | |
| Councillor Emily Tester | 1 | | |
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| Councillor Jon Hartley (reserve) | | Legal Officer | 1 |
| Councillor Nick Johnson (reserve) | | c/o Kamil Dolebski, Specialist Planning Lawyer | |
| Councillor Michael Situ (reserve) | | 2nd Floor, Hub 2 | |
| Councillor Cleo Soanes (reserve) | | | |
| **MEMBERS OF PARLIAMENT (Electronic)** | | **CONSTITUTIONAL TEAM** | |
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| | | 2nd Floor, Hub 2 | |
| Miatta Fahnbulleh MP, House of Commons, London, SW1A 0AA | | | |
| Helen Hayes MP, House of Commons, London, SW1A 0AA | | **TOTAL PRINT RUN** | 12 |
| | | List Updated: 24 June 2025 | |