Open Agenda

Planning Committee (Major Applications) B

Tuesday 15 July 2025
6.30 pm
Ground Floor Meeting Room G02A - 160 Tooley Street, London SE1 2QH

Membership	Reserves
Councillor Richard Livingstone (Chair)	Councillor Gavin Edwards
Councillor Kath Whittam (Vice-Chair)	Councillor Esme Hicks
Councillor Sam Dalton	Councillor Nick Johnson
Councillor Ketzia Harper	Councillor Jason Ochere
Councillor Cleo Soanes	Councillor Reginald Popoola
Councillor Emily Tester	Councillor Catherine Rose
Councillor Joseph Vambe	Councillor Martin Seaton

INFORMATION FOR MEMBERS OF THE PUBLIC

Access to information

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

Babysitting/Carers allowances

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Access

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

Contact

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

Members of the committee are summoned to attend this meeting
Althea Loderick
Chief Executive
Date: 7 July 2025

PRINTED ON RECYCLED PAPER

Planning Committee (Major Applications) B

Tuesday 15 July 2025
6.30 pm
Ground Floor Meeting Room G02A - 160 Tooley Street, London SE1 2QH

Order of Business

Item No.	Title	Page No.
	PART A - OPEN BUSINESS	
1.	**APOLOGIES** To receive any apologies for absence.	
2.	**CONFIRMATION OF VOTING MEMBERS** A representative of each political group will confirm the voting members of the committee.	
3.	**NOTIFICATION OF ANY ITEMS OF BUSINESS WHICH THE CHAIR DEEMS URGENT** In special circumstances, an item of business may be added to an agenda within five clear days of the meeting.	
4.	**DISCLOSURE OF INTERESTS AND DISPENSATIONS** Members to declare any personal interests and dispensation in respect of any item of business to be considered at this meeting.	
5.	**MINUTES** To approve as a correct record the minutes of the meeting held on 14 May 2025.	1 - 6
6.	**PROPOSED LOCAL LISTED BUILDING CONSENT ORDER FOR THE INSTALLATION OF SOLAR PANELS ON GRADE II LISTED RESIDENTIAL PROPERTIES IN THE SUTHERLAND SQUARE AND LIVERPOOL GROVE CONSERVATION AREAS**	7 - 59

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7.	**DEVELOPMENT MANAGEMENT**	60 - 64
7.1.	**24/AP/2074 - THE AYLESHAM CENTRE, RYE LANE, LONDON, SE15 5EW**	65 - 305
7.2.	**24/AP/3800 - CHAMBERS WHARF, CHAMBERS STREET, LONDON, SE16 4XQ**	306 - 320
7.3.	**24/AP/3801 - CHAMBERS WHARF, CHAMBERS STREET, LONDON, SE16 4XQ**	321 - 496

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."

DISTRIBUTION LIST

Date: 7 July 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.

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
Environment, Neighbourhoods and Growth
Tel: 020 7525 5403

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

Agenda Item 5.

Planning Committee (Major Applications) B

MINUTES of the OPEN section of the Planning Committee (Major Applications) B held on Wednesday 14 May 2025 at 6.30 pm at Ground Floor Meeting Room G02A - 160 Tooley Street, London SE1 2QH

PRESENT:
Councillor Richard Livingstone (Chair)
Councillor Kath Whittam
Councillor Ketzia Harper
Councillor Jon Hartley
Councillor Cleo Soanes

OFFICER SUPPORT:
Colin Wilson; (Assistant Director Strategic Development)
Kamil Dolebski; (Specialist Planning Lawyer)
Patrick Cronin; (Team Leader–Old Kent Road Planning and Growth Team)
Connor Fitzgerald; (MRTPI – Planner Old Kent Road Planning and Growth Team)
Charlotte Brooks-Lawrie; (Planning Policy Manager-Resource)
Gregory Weaver (Constitutional Officer)

1. APOLOGIES

Apologies were received from Councillor Emily Tester and Michael Situ.

2. CONFIRMATION OF VOTING MEMBERS

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

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

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

4. DISCLOSURE OF INTERESTS AND DISPENSATIONS

The following members' declared an interest in item:

7.1 – 24/AP/3687 – 79-161 ILDERTON ROAD, LONDON SE16 3JZ

Councillor Richard Livingstone, non-prejudicial, because while the site in question were in his ward, he did not have any prejudicial interest in this item.

5. MINUTES

RESOLVED:

That the minutes for the Planning Committee (Major Applications) B meeting held on 14 May 2025 be approved as a correct record signed by the chair.

6. ADOPTION OF THE AFFORDABLE HOUSING SUPPLEMENTARY PLANNING DOCUMENT, SECTION 106 AND COMMUNITY INFRASTRUCTURE LEVY SUPPLEMENTARY PLANNING DOCUMENT AND HOUSEHOLDER DEVELOPMENT SUPPLEMENTARY PLANNING DOCUMENT.

Report: See pages 7-183 of the main agenda report.

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

RESOLVED:

1. The following Supplementary planning documents (SPDs) will go to Cabinet in July 2025 for approval following public consultation earlier this year:

    - Householder Development SPD
    - Section 106 (S106) and Community Infrastructure Levy (CIL) SPD
    - Affordable Housing SPD

2. Part 3C (paragraph 21) of the council's Constitution sets out the requirement for Cabinet to adopt SPDs, taking account of comments from the planning committee.

3. This report is being presented to Planning Committee B to provide the Committee with the opportunity to ask any questions in relation to the documents.

7. DEVELOPMENT MANAGEMENT

RESOLVED:

1. That the determination of planning application, or formal observations and comments, the instigation of enforcement action and the receipt 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.

7.1 24/AP/3687 - 79-161 ILDERTON ROAD, LONDON, SE16 3JZ

Planning Application Number: 24/AP/3687

Report: See pages 189-452 of the main agenda and pages 1-3 of the addendum.

Proposal:

Redevelopment of the site to provide two separate buildings comprising large scale purpose built shared living (LSPBSL) units, conventional residential dwellings, flexible commercial floorspace, accessible parking, children's play space, public realm improvements, landscaping and other associated works.

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

Members put questions to the officers.

There were no objectors present.

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

There were no supporters present.

There were no ward councillors present.

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

Members asked for the following to be included:

- Accept 14 hours would be the average time of operation and that officers and applicant could work to adopt something akin to dawn to dusk policy.

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

RESOLVED:

1. a) That full planning permission be granted for 24/AP/3687, subject to conditions, referral to the Mayor of London and the applicant entering into a satisfactory legal agreement.

   b) That in the event that the legal agreement has not been entered into by 14th November 2025 the Director of Planning and Growth be authorised to refuse planning permission for 24/AP/3687, if appropriate, for the reasons set out in paragraph 708 of this report.

7.2 20/AP/2993 - RICH INDUSTRIAL ESTATE, CRIMSCOTT STREET AND WILLOW WALK, LONDON SE1 5TE

Planning Application Number: 24/AP/2993

Report: See pages 1-239 of the main agenda and pages 3- of the addendum.

Proposal:

Demolition of existing building and the development of a mixed-use development of up to 14 storeys in height plus a basement to provide up to 183 residential units (Use Class C3); flexible retail/restaurant/office (Use Class E) floorspace at ground floor and part first floor levels; plus associated public realm works, landscaping, car and cycle parking, and associated works. The application is supported by an Environmental Statement (ES) and a corresponding Addendum in line with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

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

Members put questions to the officers.

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

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

There were no supporters present.

There were no ward councillors present.

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

Members asked for the following to be included:

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

RESOLVED:

1. That planning permission is granted subject to conditions and the completion of a S106 Agreement;

2. That the director of planning and growth be authorised under delegated authority to make 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 Panning (Environmental Impact Assessment) Regulations 2017 (as amended); and

4. 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

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 the 14th November 2025, the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 949.

Meeting ended at 22:15pm.

CHAIR:

DATED:

Agenda Item 6.

Meeting Name:	Planning Committee (Major Applications) B
Date:	15 July 2025
Report title:	Proposed Local Listed Building Consent Order for the installation of solar panels on grade II listed residential properties in the Sutherland Square and Liverpool Grove Conservation Areas
Ward(s) or groups affected:	Newington Faraday
Classification:	Open
Reason for lateness (if applicable):	N/A
From:	Director of Planning and Growth

RECOMMENDATION(S)

That the Planning Committee:

1. Approves the draft Local Listed Building Consent Order (LLBCO) for the installation of solar panels on Grade II listed residential properties in the Sutherland Square Conservation Area and the Liverpool Grove Conservation Area (draft attached at Appendix 1).

2. Approves that statutory consultation be undertaken on the draft LLBCO.

3. Notes that the outcome of the statutory consultation be reported back to the Planning Committee with a recommendation on the possible making and adoption of the LLBCO.

4. Notes the findings of the Equality Impact and Needs Analysis (EINA) (attached at Appendix 2).

BACKGROUND INFORMATION

5. LLBCOs grant listed building consent for works of any description for the alteration or extension (but not demolition) of listed buildings in an area (section 26 of the Planning (Listed Buildings and Conservation Areas) Act 1990). This means that owners and developers do not need to submit repetitive applications for listed building consent for works covered by an LLBCO.

6. The residents of Sutherland Square Conservation Area (CA) approached the Council in September 2024 regarding the potential for a bespoke LLBCO for

the installation of solar panels at residential listed buildings within Sutherland Square CA. The initiative aligns with the Council's commitment to reduce carbon emissions and is supported in principle. Due to the similar size and geographical proximity, the project was expanded to cover Liverpool Grove CA as well.

7. The making of a LLBCO is not a matter specifically reserved to the Planning Committee. In accordance with Part 3F of the Council's Constitution, matters not expressly reserved to Planning Committee are delegated to the Director of Planning and Growth. However, due to the importance of the proposed LLBCO, the Director has chosen to refer the matter to the Planning Committee for a decision.

8. In drafting the LLBCO, research and careful consideration have been undertaken to define the specific circumstances where an installation of solar panels is not likely to cause any harm to the special interest of the listed buildings and CAs. The next step is to consult the public, affected property owners and Historic England on the draft LLBCO as required by the relevant legislation.

KEY ISSUES FOR CONSIDERATION

Climate change implications

9. The Council declared climate emergency in March 2019. The Southwark Climate Change Strategy and Action Plan, adopted in July 2021, sets out how to achieve carbon neutrality by 2030. *Renewable Energy* is one of the priority areas. The Council Delivery Plan 2022-2026 also includes *healthy environment* as one of the seven themes, and commits to reducing carbon emissions from buildings.

10. Solar energy is a type of renewable energy. Currently, installations of solar panels at listed buildings require a listed building consent. A LLBCO is intended to streamline the process and encourage the installation of solar equipment at historic buildings. Clear scope and conditions have been specified and, if complied with, solar equipment can be installed without the need to apply for a listed building consent.

11. Instead of a blanket order for listed buildings across the borough, two CAs, Liverpool Grove and Sutherland Square, have been selected as the subject for a pilot initiative. This allows the Council to identify specific properties that are eligible for the Order (see appendices 8.2 and 8.3 of the draft LLBCO). Given the physical proximity of listed buildings within each CA, eligible property owners may benefit from economies of scale by hiring a single contractor as a group.

12. Note that planning permission will still be required for solar panels on listed buildings notwithstanding a LLBCO granting listed building consent for such work. There is no legal mechanism to waive the need for planning permission, for solar panels on listed buildings.

Heritage impact

13. Section 26F of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that in considering whether to make a LLBCO the Council must have special regard to the desirability of preserving listed buildings of a description to which the order applies, their setting or any features of special architectural or historic interest which they possess. Meanwhile, paragraph 212 of the National Planning Policy Framework (2024) requires great weight to be given to the conservation of designated heritage assets.

14. Section 4.2 of the draft LLBCO discusses the significance of the listed buildings and CAs and assesses the impact of the installation of solar equipment on their special interest in detail. For the sake of brevity, the findings are summarised as follows –

15. Historic roof forms and features are essential parts of a listed building's architectural detailing. On a broader scale, the composition of roof forms and features across properties define the roofscape that contribute to the character and appearance of a CA. Where roof forms are consistent, they create a sense of visual cohesion and rhythm. The basic roof forms, uninterrupted rooflines and distinctive roof features are important characteristics which should be preserved.

16. Solar PV and solar thermal equipment are modern installations. Where visible from the streets, they would appear incongruous with the historic character and appearance of listed buildings and the CAs. Without careful consideration, they could also disrupt roof features. These would constitute harm to the significance of the listed buildings and the character and appearance of the CAs.

17. To prevent harm, the draft LLBCO only allows installations of solar equipment where they will be almost invisible from the streets, i.e. the inverted slopes of a butterfly roof or a flat roof at a minimum of two storeys or 6 metres above street level. A schedule and map of eligible properties are provided in the appendices of the draft Order.

18. Section 3 of the draft LLBCO clearly specifies the scope of works covered and includes a list of conditions. The conditions have been written with reference to the relevant permitted development right for non-listed building[1] and guidance under the draft Householder Development Supplementary Planning Document (2024), and are designed to minimise potential impact on the appearance and historic fabric of the listed buildings.

19. It is considered that the installation of solar equipment, subject to the conditions, would have limited and easily reversible impact on the special interest of the listed buildings and CAs. No harm will be resulted from the works

[1] Town and Country Planning (General Permitted Development) (England) Order 2015, Sch. 2, Pt. 14, Class A.

under the proposed LLBCO. The LLBCO would be compliant with the relevant legislative and policy requirements.

20. Officers note that there is no statutory time limit for the duration of a LLBCO. However, officers have considered that a term of 5 years from the date of the order is appropriate to meet appropriate standards and principles for conservation and has regard to the special interest of the affected buildings.

Consultation plan

21. In accordance with the requirements of the Planning (Local Listed Building Consent Orders) (Procedure) Regulations 2014, a public consultation and consultation with Historic England of at least 28 days are required for the draft LLBCO. Officers anticipate that the consultation will commence in August 2025.

22. The proposed means of consultation include:

Method	Consultee
Hard copy of the draft LLBCO and statement of reasons for inspection at the Tooley Street office and the Southwark Heritage Centre and Walworth Library	General public
Website	General public
Site notices	General public and affected property owners
Planning register (A dummy application has been set up to collect consultation responses on the register.)	Historic England, amenity groups (Victorian Society, Georgian Group), affected property owners, general public.
Press notice in local newspaper (optional)	General public
Information leaflet (optional)	Affected property owners
Attend TRA meetings where requested	Those who attend the TRA meetings

23. Representations can be made by:
    - Submitting a comment via planning register
    - Mailing us at –
      Design, Conservation and Transport Team
      Planning and Growth
      160 Tooley Street
      London
      SE1 2QH

24. Representations received in response to these consultations including those from Historic England will be considered in drawing up the final version of the LLBCO. The tentative timeline is as follows.

Stage	Timescale
Consultation	August 2025 - September 2025
Review of consultation responses	October 2025
Adoption	November 2025

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

25. Section 149 of the Equality Act 2010 sets out the Public Sector Equality Duty (PSED). This requires public bodies to consider all individuals when carrying out their day-to-day work – in shaping policy, in delivering services and in relation to their own employees. It requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between different people when carrying out their activities. The council's Approach to Equality commits the council to ensuring that equality is an integral part of our day-to-day business. The Equality Framework for Local Government exists to help organisations, review and improve their performance for people with characteristics protected by the Equality Act 2010.

26. An EINA has been undertaken to assess the impact on the community at large and on people identified as possessing protected characteristics. It is concluded that the LLBCO would have no negative impacts on equalities in Southwark. It will offer benefits to residents of the eligible properties and the wider community, regardless of their protected characteristics. The benefits include climate change mitigation, protection of built heritage and townscape, and potential reduction in energy bills.

27. The EINA found that the LLBCO may benefit some groups more than others, as the works consented under the LLBCO are simpler to implement if in home ownership.

28. The LLBCO could also be of particular benefit to some protected groups who are more likely to experience fuel poverty.

29. Apart from ensuring the accessibility of public consultation and documents, there are no mitigating or improvement actions to be taken as a result of the EINA as no negative impacts are identified.

30. A full analysis can be found in Appendix 2 to this report. Following consultation, the EINA will be revised and updated as necessary.

Resource implications

31. The operational costs associated with the making and consultation of the draft LLBCO, subsequent reviews will be funded within the approved budget of the planning division. Such undertakings are part of the management of the historic environment and as such will be carried out by the Design, Conservation and Transport Team within its existing staffing resources.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Assistant Chief Executive, Governance and Assurance (AGG 24/06/25)

32. Planning Committee is asked to approve the draft LLBCO for the installation of solar panels on Grade II listed residential properties in the Sutherland Square Conservation Area and the Liverpool Grove Conservation Area, and for officers to commence the statutory consultation process. The making of a LLBCO is not a matter specifically reserved to the Planning Committee. In accordance with Part 3F of the Council's Constitution, matters not expressly reserved to Planning Committee are delegated to the Director of Planning and Growth. However, due to the importance of the proposed LLBCO, the Director has chosen to refer the matter to the Planning Committee for a decision.

33. Planning Committee is reminded of the PSED under section 149 of the Equality Act 2010 which has been considered by officers at paragraphs 25 to 30. Planning Committee should consider the EINA attached at Appendix 2 when making this decision.

34. 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 climate consequences of taking the decision. This has been considered at paragraphs 9 to 12.

Strategic Director of Resources (FG – 85)

35. The strategic director of resources notes that this report seeks Planning Committee approval to:

    a) Approve a draft Local Listed Building Consent Order (LLBCO) for the installation of solar panels on Grade II listed residential properties in the Sutherland Square and Liverpool Grove Conservation areas and as per the proposal contained in paragraph 17.

    b) Approve the proposed statutory consultation on the LLBCO.

    c) Note that the outcome of the consultation will be reported back to Planning Committee and with a possible recommendation of making and adopting the LLBCO.

36. The strategic director of resources also notes that there are no direct costs or income arising from this report and all subsequent costs/income will be met from existing approved budgets in Planning division.

APPENDICES

No.	Title
Appendix 1	Draft LLBCO
Appendix 2	Equality Impact and Needs Analysis
Appendix 3	Photos of the conservation areas and listed buildings

AUDIT TRAIL

Lead Officer	Stephen Platts, Director of Planning and Growth
Report Author	Sandy Ng, Planner in Design, Conservation and Transport Team
Version	Final
Dated	25 June 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 of Resources	Yes	Yes
Cabinet Member	Yes	Yes
Date final report sent to Constitutional Team		26 June 2025

Local Listed Building Consent Order for the Installation of Solar Panels on Grade II Listed Residential Properties in the Sutherland Square and Liverpool Grove Conservation Areas, London Borough of Southwark

This Order is made under the provisions as set out in the Planning (Local Listed Building Consent Orders) (Procedure) Regulations 2014; Sections 26D-G, 28A and Schedule 2A of the Planning (Listed Buildings and Conservation Areas) Act 1990.

1 Introductory

The **LOCAL LISTED BUILDING CONSENT ORDER** is made on [ ].

2 The listed buildings covered by the Order

2.1. Grade II listed residential properties within the Sutherland Square and Liverpool Grove Conservation Areas (CAs) that have either:

i) a butterfly roof; or
ii) a flat roof at a minimum of two storeys or 6 metres above street level.

2.2. A schedule and map of eligible properties are provided in the appendices.

3 Description of the consented works

3.1. Installation of microgeneration solar photovoltaics (PV)[1] or solar thermal panels and associated works, including:

i) installation of associated equipment necessary for the operation of the system; and
ii) minor repairs and making good of the roof.

3.2. Consent is granted subject to the following conditions:

<u>Siting</u>

i) The solar panels should be installed on the inverted slopes of a butterfly roof, or a flat roof at a minimum of two storeys or 6 metres above street level[2];

[1] For the purpose of this Order, solar PV includes only solar panels but not ‘solar tiles’ or ‘solar slates’
[2] For the purpose of this Order, this includes the roof of any extension, outrigger or structures ancillary to the principal listed building.

ii) The solar panels will not protrude more than 0.2 metre beyond the plane of the roof when measured from the perpendicular with the external surface of the roof;
iii) If installed on a flat roof, the solar panels should be set in at least 1m from all edges;
iv) The solar panels should be positioned to avoid disruption to roof features, if any;

Associated works

v) No guard rails are to be installed on the roof;
vi) Associated equipment like batteries or pumps (except cabling, mounting rails, and pipes) should be no more than 0.3m deep, 1.5m tall and 1m wide, unless agreed in writing by the Local Planning Authority prior to the commencement of works.
vii) Repairs to the roof and works of making good, whether internal or external, should be finished to match the adjacent work in terms of material, colour, texture, size, shape, detailed arrangement and construction; and should be limited to localised repairs of roof coverings, maintenance of drainage and rainwater goods, retention and strengthening of existing roof structures by setting new timbers alongside, unless agreed in writing by the Local Planning Authority prior to the commencement of works.

Maintenance

viii) The solar system should be maintained in good order and removed as soon as reasonably practicable when no longer needed.

4 Statement of reasons for the consented works

4.1. Justification for making this Order

4.1.1. The Council declared climate emergency in March 2019. The Southwark Climate Change Strategy and Action Plan, adopted in July 2021, sets out how to achieve carbon neutrality by 2030. *Renewable Energy* is one of the priority areas. The Council Delivery Plan 2022-2026 also includes *healthy environment* as one of the seven themes, and commits to reducing carbon emissions from buildings.

4.1.2. Solar energy is a type of renewable energy. Currently, installations of solar panels at listed buildings require a listed building consent. In line with our commitment to achieve carbon neutrality by 2030, this Order is prepared to encourage the installation of solar equipment on historic buildings by streamlining the process. Clear scope and conditions have been set out and, if complied with, solar equipment can be installed without the need to apply for a listed building consent.

4.1.3. Instead of a blanket order for listed buildings across the borough, two CAs, Liverpool Grove and Sutherland Square, have been selected as the subject for a pilot initiative. This allows the Council to identify specific properties that are eligible for this Order (see appendices 8.2 and 8.3). Given the physical proximity of listed buildings within each CA, eligible property owners may benefit from economies of scale by hiring a single contractor as a group.

4.2. Heritage considerations

4.2.1. Section 26F of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that in considering whether to make the Order the Council has special regard to the desirability of preserving listed buildings of a description to which the Order applies, their setting or any features of special architectural or historic interest which they possess. Meanwhile, paragraph 212 of the National Planning Policy Framework (2024) requires great weight to be given to the conservation of designated heritage assets.

Significance of the listed buildings and conservation areas

4.2.2. The Liverpool Grove CA is a remarkable example of social housing from the 1890s with the backing of Octavia Hill. The Arts and Crafts language, cottage-style design, and village townscape lined with trees dominate much of the area's character. Other notable buildings, including the grade I listed St. Peter's Church designed by Sir John Soane and grade II listed Regency/ early Victorian houses to the south of the church, also contribute to the area's significance.

4.2.3. Meanwhile, the Sutherland Square CA is significant for its well-preserved 19th-century terraces/ linked blocks of two to four storeys, many of which are listed or locally listed. The oldest houses pre-date the railway development and are situated around Sutherland Square on the former pleasure gardens of Walworth. Other houses on Lorrimore Square, Lorrimore Road and Carter Steet are later. The heart of the CA was extensively damaged in WWII and rebuilt.

4.2.4. Further details of the CAs and listed buildings are described in the conservation area appraisals and official list entries. For the purpose of this Order, this assessment focuses on how roof forms contribute to the significance of the listed buildings and CAs.

4.2.5. Historic roof forms and features, e.g. chimney stacks, upstand parapets and cornice, are essential parts of a listed building's architectural detailing. On a broader scale, the composition of roof forms and features across properties define the roofscape that contribute to the character and appearance of a CA. Where roof forms are consistent, they create a sense of visual cohesion and

rhythm. The basic roof forms, uninterrupted rooflines and distinctive roof features are important characteristics which should be preserved.

4.2.6. The map in appendix 8.1 identifies the different roof typologies of grade II listed residential properties within the selected CAs. These include butterfly, crown, pitched and hipped roofs. Some properties have a combination of hipped/ pitched and flat roofs.

4.2.7. Butterfly roofs are historically associated with Georgian and late Victorian eras. Their inverted, downward-sloping surfaces drain rainwater efficiently via a central gully. The butterfly roofscape has created a cohesive townscape along the southern edge of St Peter's Churchyard in Liverpool Grove CA and parts of Sutherland Square within Sutherland Square CA. While the front parapets of these buildings are linear, the V-shaped, symmetrical roof form can be appreciated from the rear.

4.2.8. The hipped roofs and crown roofs, with few exceptions on the western side of Sutherland Square, are often arranged in pairs with a shared chimney stack. In particular, the combination of hipped roofs to the main house and flat roofs to the entrance bays at nos. 48-74 (even) Lorrimore Road presents a strong rhythm.

4.2.9. Pitched roofs contribute to the sense of visual continuity in both CAs. They are particularly steep at nos. 1A, 1-23 (odd) Portland Street within Liverpool Grove CA and are gabled at the terraces' ends. Meanwhile, those lining the southwestern corner of Sutherland Square are pitched to the front but flat to the rear.

4.2.10. Overall, roof forms are integral to the architectural and historic character of the listed buildings. They vary across properties but often appear in clusters which contribute to the rhythmic rooflines within the CAs.

Impact of the consented works on significance

4.2.11. Solar PV and solar thermal equipment are modern installations. Where visible from the streets, they would appear incongruous with the historic character and appearance of listed buildings and the CAs. Also, they could add visual clutter to the roofscape. Their visual impact could be exacerbated by the shiny/ reflective finish and contrast in colour with existing roof tiles. Without careful consideration, the installations could also disrupt roof features. These would constitute harm to the significance of the listed buildings and character and appearance of the CAs.

4.2.12. To prevent harm, this Order only allows installations of solar PV and solar thermal equipment where they will be almost invisible from the streets. Having surveyed the roof typologies of listed buildings within the CAs through satellite

images and site visits, it is considered that the inverted slopes of a butterfly roof or a flat roof at a minimum of two storeys or 6 metres above street level would offer the opportunity for discreet installations.

4.2.13. Conditions attached to this Order will further minimise the visual impact of the solar installations – through (ii) limiting their height, (iii) requiring minimum set in from the roof edges, (v) prohibiting the installation of guard rails, and (vi) restricting the size of associated equipment unless agreed otherwise. With these conditions in place, any view of the installations from the public realm would be incidental and immaterial.

4.2.14. Further conditions are imposed to preserve the appearance of the listed buildings and the wider CAs. Condition (iv) ensures surviving roof features remain undisrupted. Condition (vii) requires roof repairs are localised and like-for-like.

4.2.15. Potential impact on the historic fabric of listed buildings has also been considered. It is considered that standard methods of fixing solar panels or solar equipment on rails mounted to hooks attached to rafters will have negligible impact on historic fabric. Meanwhile, the installation of solar tiles and solar slates could result in the irreversible loss of historic roof coverings. It is therefore excluded from this Order. While minor repairs and making good of the roof are permitted under this Order, condition (vii) requires prior consent to be obtained for any structural strengthening works. This allows the Council to control over the potential loss of historic roof structures and ensure structural integrity of the listed buildings.

4.2.16. The conditions have been written with reference to the relevant permitted development right for non-listed buildings[3] and guidance under the draft Householder Development Supplementary Planning Document (2024).

4.2.17. For the reasons set out above, the Council considers that the installation of solar equipment under this Order, subject to the conditions set out above, would have limited and easily reversible impact on the appearance and fabric of the listed buildings. No harm will be resulted from the works under this Order. The Order is therefore compliant with the relevant legislative and policy requirements.

5 Term of Order

5.1. A period of no more than 5 years from the starting date of the Order.

6 Operation of the Order

[3] Town and Country Planning (General Permitted Development) (England) Order 2015, Sch. 2, Pt. 14, Class A.

6.1. The Order has been made in accordance with the requirements of the Planning (Local Listed Building Consent Orders) (Procedure) Regulations 2014, including a public consultation of at least 28 days, and consultation with Historic England of at least 28 days. Representations received in response to these consultations have been considered in drawing up the final version of the Order.

6.2. The Council will review the operation of the Order periodically both quantitively, in terms of the instances of solar equipment installed under its provisions, and qualitatively, in terms of the effects on the listed buildings affected. If at any time during the life of the Order it is considered that it is either ineffective in encouraging the use of solar panels or is giving rise to unexpected and unacceptable harm to listed buildings to which it applies, it will be varied or revoked.

6.3. If the Council revokes this Order at any point prior to the end date given above, any works authorised by the Order which have been started but not completed may be completed within six months of the date of revocation. Works which have been started but not completed at the end date given above may also be completed within six months of that date. However, once the Order expires or is revoked, any works previously covered by the Order which have not been started will no longer benefit from the consent granted through the Order.

6.4. If at the end of the term of the Order it is considered that it is operating effectively and does not give rise to undue harm, it will be renewed, and a longer term considered.

6.5. As an Order confers listed building consent for specified works, a breach of the Order by carrying out works not authorised by the Order may lead to enforcement action.

7 Further guidance

7.1. <u>Requirement for other permissions</u>

7.1.1. While this Order removes the need to apply for a listed building consent, other permissions may still be required for the works covered by this Order.

7.1.2. The permitted development right for the installation or alteration of solar equipment on domestic premises does not apply to listed buildings. A Local Development Order cannot be made [4] grant planning permission for development affecting a listed building either. As such, planning permission is required for the works consented by this Order. Under our “Green Deal” policy, the relevant planning applications will be processed within an

[4] Town and Country Planning (Development Management Procedure) (England) Order 2015, Pt. 8, art. 38(12)(a).

accelerated timeframe. The internal deadline is streamlined to 42 days instead of the standard 56 days.

7.1.3. Trees in CAs are protected if they have a diameter of 7.5cm or more, or are part of a group with a diameter of 10cm or more when measured at 1.5m above ground level. If you plan to prune or remove a protected tree to facilitate the installation, you will need to give the Council 6 weeks' notice via a section 211 notice. Alternatively, you should include works to trees as part of the proposal to be considered under a planning application.

7.1.4. Building regulations will normally apply for installations of solar equipment. You are advised to consider the following issues to ensure compliance with building regulations:

- Structural safety: The roof must be able to support the additional weight of the solar equipment. This should be checked by a structural engineer.
- Electrical safety: Electrical faults can cause fires. The system should be designed and installed by competent contractors, adhering to industry best practice and regulations.
- Ventilation: The system, including panels and associated equipment like battery and inverter, generates a fair amount of heat. Care should be taken to ensure adequate ventilation, hence prevent overheating and fire.

7.1.5. A building regulations application will not be required if the system is installed by a member of an approved Competent Persons Scheme (CPS) for microgeneration technology. Otherwise, you will have to submit a Building Notice or Full Plans Application and pay a fee to for a building control person to inspect the work. Note not all CPS installers are certified to carry out a structural assessment of roof structures. Some are only able to deal with the electrical aspects of the installation. It may be necessary for a building regulation application to be made for the structural assessment. It should be checked that the installer is a member of a scheme covering all the work they will be doing.

7.1.6. Before works begin, a Certificate of Lawfulness of Proposed Works to a Listed Building can be applied for optionally. It offers formal confirmation that the installation of solar equipment in compliance with the conditions attached to this Order is lawful and will not require listed building consent.

7.2. Design guidance

7.2.1. The following design guidance is useful to minimise any potential impact of the installation on the appearance and historic fabric of a listed building.

- Layout: For a tidy appearance, panels should be well aligned and arranged in the same direction, with even distance to roof edges.

- Colour and finish: To remain discreet, the colour of panels, frames, exposed cabling/ pipes should resemble that of the roof and the building's exterior.
- Strengthening of roof structures: Strengthening works should only be what is necessary to support the panels. Conventional carpentry techniques should be used where possible. Any change in the roof profile, introduction of modern materials such as steelwork, or extensive replacement of historic structural timbers will not be supported unless robustly justified.
- Associated equipment: These should be kept to a minimum and located discreetly. For example, new cabling or pipes could follow existing servicing routes. Other associated equipment could be located in existing utility cupboards, roof voids, a new cupboard on the uppermost floor, the rear garden or attached to the wall of a later extension. Disturbance to historic features such as skirting and wall panelling should be avoided.

7.3. External guidance

7.3.1. Historic England has produced a useful guide to the installation of solar panels on historic buildings: https://historicengland.org.uk/advice/technical-advice/building-services-engineering/installing-photovoltaics/

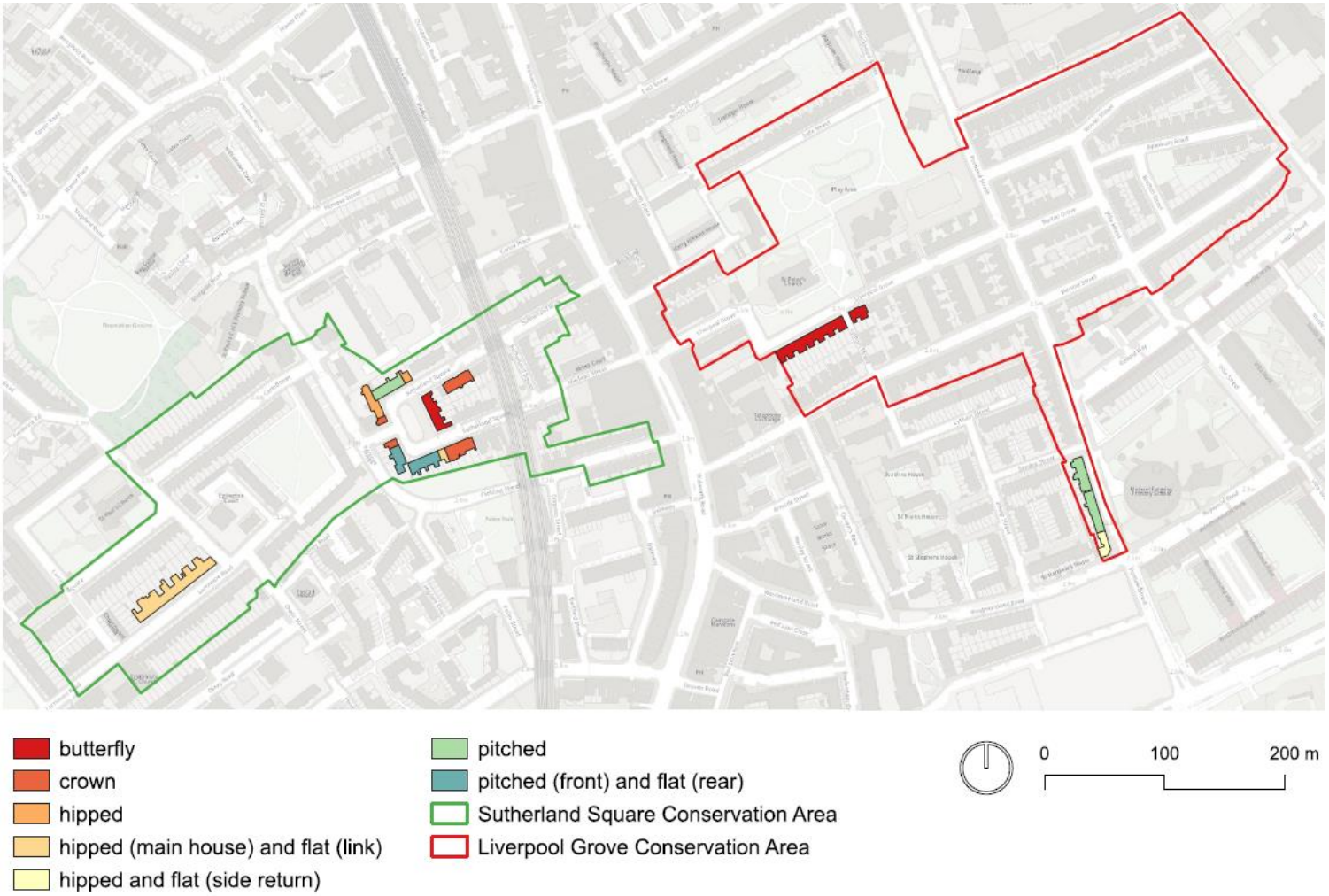
7.3.2. The Campaign for the Protection of Rural England (CPRE) has produced advice on 'Ensuring Place-Responsive Design for Solar Photovoltaics on Buildings'. This is summarised in their leaflet 'Solar Design Tips – Your 10 Point Guide'. While primarily focused on rural locations, the design guidance is also relevant in the urban environment, particularly where there is some visibility of the roof which is to host the solar equipment.

The Common Seal of the Mayor and Burgesses of the London Borough of Southwark was hereto affixed in the presence of:

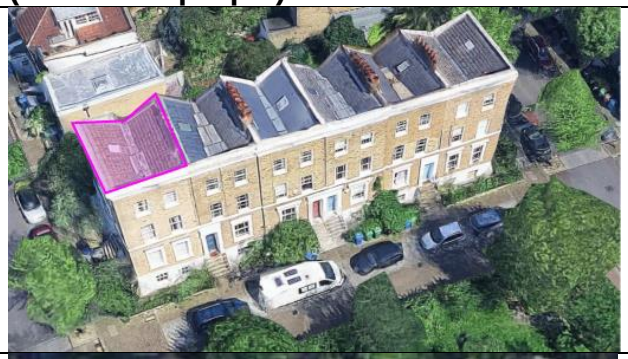
Authorised Signatory

8 Appendices

8.1. Map of roof typology of grade II listed residential properties within the CAs



8.2. Schedule of eligible properties

Address	**Roof type**	**Suitable area for installation (shaded in purple)**
55-60 Sutherland Square, SE17 3EL 28-58 (even) Liverpool Grove, SE17 2HJ	Butterfly	
25-32 Sutherland Square, SE17 3EQ	Pitched (front) and flat (rear)	

48-74 (even) Lorrimore Road, SE17 3LZ 24 Sutherland Square, SE17 3EQ	Hipped (main house) and flat (link)	
Aycliffe House, Portland Street, SE17 2PE	Hipped and flat (side return)	

8.3. Map of eligible properties



Appendix 2 Equality Impact and Needs Analysis

Equality Impact and Needs Analysis

Proposed Local Listed Building Consent Order for the Installation of Solar Panels on Grade II Listed Residential Properties in the Sutherland Square and Liverpool Grove Conservation Areas

Section 1: Equality impact and needs analysis details

Proposed policy/decision/business plan to which this equality analysis relates	Proposed Local Listed Building Consent Order for the Installation of Solar Panels on Grade II Listed

	Residential Properties in the Sutherland Square and Liverpool Grove Conservation Areas

Equality analysis author		Sandy Ng, Planner in Design, Conservation & Transport Team			
Strategic Director:		Clive Palfreyman			
Department		Resources	**Division**		Planning and Growth
Period analysis undertaken		2 June 2025 to 13 June 2025			
Date of review (if applicable)					
Sign-off	Michael Tsoukaris	**Position**	Head of Design, Conservation and Transport	**Date**	26 June 2025

Section 2: Brief description of policy/decision/business plan

1.1 Brief description of policy/decision/business plan
The Council is proposing a bespoke Local Listed Building Consent Order (LLBCO) to waive the need to apply for a listed building consent for the installation of solar panels at grade II listed residential properties within Sutherland Square and Liverpool Grove Conservation Areas (CAs), subject to conditions. A schedule and map of eligible properties are provided in appendices 8.2 and 8.3 of the draft LLBCO. The policy aims to remove barriers in the planning system and promote the installation of solar panels in line with the Council's commitment to achieve carbon neutrality by 2030. The initiative was proposed by residents in the Sutherland Square Conservation Area. It was later expanded to cover grade II residential listed buildings in the Liverpool Grove Conservation Area due to the similar size and physical proximity of the two areas.

Section 3: Overview of service users and key stakeholders consulted

2. Service users and stakeholders	
Key users of the department or service	Externally, the key users of the Order will be the owners/ residents of the eligible properties identified. Other users may include architects, contractors or those employed to design and install solar panels in line with the conditions specified in the Order. Internally, the Order will be used by planning/ enforcement officers to monitor and review the installation of solar panels at residential listed buildings in the conservation areas. It will also be used to assess and decide Approval of Details applications in relation to the Order.
Key stakeholders involved in this policy/decision/ business plan	The idea was initially proposed by residents in the Sutherland Square Conservation Area. The draft Order was prepared and developed by Design, Conservation & Transport Team within the planning division, with informal advice from Building Control and Applications Teams. An early draft of the Order was reviewed by the Cabinet Member for New Homes and Sustainable Development in February 2025. The final draft will be taken to the Planning Committee B (Majors) in July 2025 to agree on public consultation. Members of the public, affected property owners, Historic England and amenity groups will be consulted on the draft Order for a minimum of 28 days.

Section 4: Pre-implementation equality impact and needs analysis

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This section considers the potential impacts (positive and negative) on groups with 'protected characteristics', the equality information on which this analysis is based and any mitigating actions to be taken, including improvement actions to promote equality and tackle inequalities. An equality analysis also presents as an opportunity to improve services to meet diverse needs, promote equality, tackle inequalities and promote good community relations. It is not just about addressing negative impacts.

The columns include societal issues (discrimination, exclusion, needs etc.) and socio-economic issues (levels of poverty, employment, income). As the two aspects are heavily interrelated it may not be practical to fill out both columns on all protected characteristics. The aim is, however, to ensure that socio-economic issues are given special consideration, as it is the council's intention to reduce socio-economic inequalities in the borough. Key is also the link between protected characteristics and socio-economic disadvantage, including experiences of multiple disadvantages.

Socio-economic disadvantage may arise from a range of factors, including:

- poverty
- health
- education
- limited social mobility
- housing
- a lack of expectations
- discrimination
- multiple disadvantage

The public sector equality duty (PSED) requires us to find out about and give due consideration to the needs of different protected characteristics in relation to the three parts of the duty:

1. Eliminating discrimination, harassment and victimisation
2. Advancing equality of opportunity, including finding out about and meeting diverse needs of our local communities, addressing disadvantage and barriers to equal access; enabling all voices to be heard in our engagement and consultation undertaken; increasing the participation of under-represented groups
3. Fostering good community relations; promoting good relations; to be a borough where all feel welcome, included, valued, safe and respected.

The PSED is now also further reinforced in the two additional Fairer Future for All values that we will:

- Always work to make Southwark more equal and just
- Stand against all forms of discrimination and racism

Age Where this is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).	
Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	**Potential Socio-Economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)**
<u>Climate change mitigation</u> The LLBCO encourages the installation of solar panels to reduce carbon emissions and mitigate the effects of climate change. This will benefit residents of all ages. <u>Heritage conservation</u> The LLBCO includes a list of conditions to guard against harmful installations. This will protect the designated heritage assets and preserve the visual amenity of the local areas for the enjoyment of residents and visitors of all ages.	<u>Cost saving and reliable energy source</u> The LLBCO grants listed building consent for the installation of solar panels at grade II listed residential properties within the conservation areas, subject to conditions. Once installed, residents of all ages could benefit from reduced energy bills and a reliable energy source. This may provide particular relief to young adults as they are more likely to live in fuel poverty than any other adult age group. <u>Home ownership</u> Works may be easier to carry out for home or freehold owners. Renters and leaseholders are less likely to pay for substantial works to a property or freehold they do not own. Older adults are more likely to own their home or the freehold than young adults. This means that older residents may benefit greater from the LLBCO as they are the group which can likely make the most use of it.
Equality information on which above analysis is based	**Socio-economic data on which above analysis is based**
<u>General data</u> Properties covered by the draft LLBCO are within the Burgess Park West & John	<u>Cost saving and reliable energy source</u> Nationally, households where the age of the oldest member is between 16 and

Ruskin Street (BPW&JRS) and Walworth South (WS) Middle Layer Super Output Areas (MSOAs). The median ages are 34 and 32 respectively. (Source: Census 2021, ONS)

Their demographics by age group reflects the borough-wide structure.

	Aged 15 or below	Aged 16-64	Aged 65 or above
BPW&JRS	15.8%	75.6%	8.7%
WS	19.2%	73.4%	7.3%
LBS	16.7%	74.9%	8.3%

(Source: Census 2021, ONS)

Southwark has an ageing population. Between 2011 and 2011, the percentage changes are:

	Aged 15 or below	Aged 16-64	Aged 65 or above
BPW&JRS	-2.9%	+2.5%	+0.4%
WS	-3.3%	+2.5%	+0.8%
LBS	-1.8%	+1.2%	+0.6%

(Source: Census 2021, ONS)

A 79% increase in the population of Southwark aged 65 or more is forecast between 2019 and 2039. This incorporates a 92% increase in those over 75 and 87% growth in those over 85. (Source: Strategic Housing Market Assessment Update 2019, Southwark Council)

24 have the highest likelihood of being in fuel poverty (25%). No other adult age group exceeds 15%. (Source: Annual fuel poverty statistics in England, 2024 (2023 data) , Department for Energy Security & Net Zero)

Home ownership

In 2019, only 5% of households in London headed by someone aged 16-24 owned their own home. By contrast, home ownership rates for householders headed by someone aged 45+ are over 50%. (Source: Housing in London 2020, GLA).

Leasehold households generally have younger household reference persons than non-leasehold households. In the England Housing Survey 2021-2022, there was a significantly higher proportion of 25-34-year-olds in leasehold households in the owner-occupied sector (14%) than in non-leasehold households overall (8%). (Source: English Housing Survey 2021 to 2022: leasehold households, DLUHC)

Mitigating and/or improvement actions to be taken

Public consultation

Older people with limited IT skills may find it difficult to access the information and consultation documents online. A mix of methods, online and offline, will be used for public consultation such that people of all ages are aware of and have a chance to comment on the draft LLBCO.

As there are no negative impacts, no mitigating actions are required.

Disability - A person has a disability if s/he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities. Please note that under the PSED due regard includes: *''the steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.''* This also includes the need to understand and focus on different needs/impacts arising from different disabilities	
Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	**Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)**
<u>Climate change mitigation</u> The LLBCO encourages the installation of solar panels to reduce carbon emissions and mitigate the effects of climate change. This will benefit all residents, including those who are disabled. <u>Heritage conservation</u> The LLBCO includes a list of conditions to guard against harmful installations. This will protect the designated heritage assets and preserve the visual amenity of the local areas for the enjoyment of all residents and visitors, including those who are disabled.	<u>Cost saving and reliable energy source</u> The LLBCO grants listed building consent for the installation of solar panels at grade II listed residential properties within the conservation areas, subject to conditions. Once installed, residents, regardless of disability, could benefit from reduced energy bills and a reliable energy source. This may provide particular relief to disabled people as they are more likely than non-disabled people to struggle to afford their energy bills. <u>Home ownership</u> Works may be easier to carry out for home or freehold owners. Renters and leaseholders are less likely to pay for substantial works to a property or freehold they do not own. Disabled people are less likely than non-disabled people to own their own home. This means the LLBCO could be less of a benefit to disabled residents.
Equality information on which above analysis is based	**Socio-economic data on which above analysis is based**

General data In 2021, 8.2% of Southwark residents identified as being disabled and limited a lot. This was a decrease from 11.1% in 2011. Almost a quarter of households (33,000) had at least one resident with a disability. (Source: How life has changed in Southwark: Census 2021, ONS). The neighbourhoods with higher proportions of disability are Old Kent Road, South Bermondsey and Nunhead & Queen's Road. (Source: Census 2021, quoted in JSNA Annual Report 2023, Southwark Council).	Cost saving and reliable energy source The poverty rate for disabled people was 30%, 10 percentage points higher than the rate for people who were not disabled. (Source: UK Poverty 2025, Joseph Rowntree Foundation) 55% of disabled adults in the UK reported finding it difficult to afford their energy bills. This compares with 40% of non-disabled people. (Source: Impact of increased cost of living on adults across Great Britain: June to September 2022, ONS) Home ownership 40% of disabled people in the UK owned their own home, compared to 53% of non-disabled people. (Source: Outcomes for disabled people in the UK: 2021, ONS)
Mitigating and/or improvement actions to be taken	
Public consultation Disabled people may find it difficult to attend in-person consultation meetings. A mix of methods, online and offline, will be used for public consultation such that people with special needs are aware of and have a chance to comment on the draft LLBCO.	As there are no negative impacts, no mitigating actions are required.

Gender reassignment - The process of transitioning from one gender to another. **Gender Identity -** Gender identity is the personal sense of one's own gender. Gender identity can correlate with a person's assigned sex or can differ from it.	
Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	**Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)**
Climate change mitigation The LLBCO encourages the installation of solar panels to reduce carbon emissions and mitigate the effects of climate change. This will benefit all residents, regardless of their gender identity. Heritage conservation The LLBCO includes a list of conditions to guard against harmful installations. This will protect the designated heritage assets and preserve the visual amenity of the local areas for the enjoyment of all residents and visitors, regardless of their gender identity.	Cost saving and reliable energy source The LLBCO grants listed building consent for the installation of solar panels at grade II listed residential properties within the conservation areas, subject to conditions. Once installed, residents, regardless of their gender identity, could benefit from reduced energy bills and a reliable energy source. Home ownership Works may be easier to carry out for home or freehold owners. Renters and leaseholders are less likely to pay for substantial works to a property or freehold they do not own. Transgender people are less likely than cisgender people to own their own home. This means the LLBCO could be less of a benefit to transgender residents.
Equality information on which above analysis is based.	**Socio-economic data on which above analysis is based**
General data 1.23% of people aged 16 years and over in Southwark have a gender identity different from their sex registered at birth. (Source: Census 2021)	Home ownership 31% of cisgender Southwark residents responded that they lived in a home that is owned by themselves or someone they live with (either outright, or with a mortgage, loan or shared ownership). By contrast, only 13.3% of trans women and 16.7% of trans men in Southwark selected one of these housing tenures.

	(Source: Gender identity by tenure: Census 2021, ONS)
Mitigating and/or improvement actions to be taken	
Public consultation Transgender people may be afraid to express their views in public meetings due to fear of discrimination. A mix of methods, online and offline, will be used for public consultation such that people of all gender identities are aware of and have a chance to comment on the draft LLBCO.	As there are no negative impacts, no mitigating actions are required.

Marriage and civil partnership – In England and Wales marriage is no longer restricted to a union between a man and a woman but now includes a marriage between a same-sex couples. Same-sex couples can also have their relationships legally recognised as 'civil partnerships'. Civil partners must not be treated less favourably than married couples and must be treated the same as married couples on a wide range of legal matters. (Only to be considered in respect to the need to eliminate discrimination.)	
Potential impacts (positive and negative) of proposed policy/decision/business plan	**Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)**
<u>Climate change mitigation</u> The LLBCO encourages the installation of solar panels to reduce carbon emissions and mitigate the effects of climate change. This will benefit all residents, regardless of their marital status. <u>Heritage conservation</u> The LLBCO includes a list of conditions to guard against harmful installations. This will protect the designated heritage assets and preserve the visual amenity of the local areas for the enjoyment of all residents and visitors, regardless of their marital status.	<u>Cost saving and reliable energy source</u> The LLBCO grants listed building consent for the installation of solar panels at grade II listed residential properties within the conservation areas, subject to conditions. Once installed, residents, regardless of their marital status, could benefit from reduced energy bills and a reliable energy source.
Equality information on which above analysis is based	**Socio-economic data on which above analysis is based**
<u>General data</u> The latest census found that 26.9% of Southwark residents were married or in a civil partnership. This was a fall from 29.4% in 2011. Southwark had the fourth-highest percentage of adults who had never been married or in a civil partnership of all English local authorities. (Source: <u>How life has changed in Southwark: Census 2021, ONS</u>) In the BPW&JRS and WS MSOAs specifically, the percentage of residents	N/A

that were married or in a civil partnership were 21.8% and 23.3% respectively. (Source: Census 2021, ONS)	
Mitigating or improvement actions to be taken	
As there are no negative impacts, no mitigating actions are required.	As there are no negative impacts, no mitigating actions are required.

Pregnancy and maternity - Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.	
Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	**Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)**
<u>Climate change mitigation</u> The LLBCO encourages the installation of solar panels to reduce carbon emissions and mitigate the effects of climate change. This will benefit all residents, including those who are pregnant or in maternity. <u>Heritage conservation</u> The LLBCO includes a list of conditions to guard against harmful installations. This will protect the designated heritage assets and preserve the visual amenity of the local areas for the enjoyment of all residents and visitors, including those who are pregnant or in maternity.	<u>Cost saving and reliable energy source</u> The LLBCO grants listed building consent for the installation of solar panels at grade II listed residential properties within the conservation areas, subject to conditions. Once installed, residents, regardless of pregnancy or maternity, could benefit from reduced energy bills and a reliable energy source.
Equality information on which above analysis is based	**Socio-economic data on which above analysis is based**
<u>General data</u> The total number of babies born in Southwark has been decreasing year on year over the past 10 years. The decline in the fertility rate in Southwark is seen across all age groups, but particularly among younger women. The average age of mothers giving birth in Southwark in 2022 was around 33 years. (Source: JSNA Annual Report 2023, Southwark Council). Across the borough there is substantial variation in the number of births each year. In 2021, the birth rate per 1.000	N/A

females aged 15-44 is 39-50% in Faraday and 27-38% in Newington. (Source: NHS Digital: Local birth files, quoted in JSNA Annual Report 2023, Southwark Council)	
Mitigating and/or improvement actions to be taken	
Public consultation Those who are pregnant or in maternity with caring responsibilities may find it difficult to attend in-person consultation meetings. A mix of methods, online and offline, will be used for public consultation such that people who are pregnant or in maternity will also be aware of and have a chance to comment on the draft LLBCO.	As there are no negative impacts, no mitigating actions are required.

Race - Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins. N.B. Gypsy, Roma and Traveller are recognised racial groups and their needs should be considered alongside all others	
Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	**Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)**
<u>Climate change mitigation</u> The LLBCO encourages the installation of solar panels to reduce carbon emissions and mitigate the effects of climate change. This will benefit all residents, regardless of their race/ ethnicity. <u>Heritage conservation</u> The LLBCO includes a list of conditions to guard against harmful installations. This will protect the designated heritage assets and preserve the visual amenity of the local areas for the enjoyment of all residents and visitors, regardless of their race/ ethnicity.	<u>Cost saving and reliable energy source</u> The LLBCO grants listed building consent for the installation of solar panels at grade II listed residential properties within the conservation areas, subject to conditions. Once installed, residents, regardless of their race/ ethnicity, could benefit from reduced energy bills and a reliable energy source. This may provide relief to ethnic minority residents in particular as they are more likely to live in fuel poverty than white households. <u>Home ownership</u> Works may be easier to carry out for home or freehold owners. Renters and leaseholders are less likely to pay for substantial works to a property or freehold they do not own. Home ownership varies greatly between ethnic minorities and is below average for most. This means the LLBCO could be less of a benefit to some minorities.
Equality information on which above analysis is based	**Socio-economic data on which above analysis is based**
<u>Ethnicity</u> Demographic data on ethnicity vary at a granular level. 2021 census data at the Output Area (OA) level are reported below, highlighting the top three ethnic	<u>Cost saving and reliable energy source</u> In the 2 years to March 2021, an average of 12.6% of white households were in fuel poverty, compared with 19.1% of households from all other ethnic groups combined. In every period

groups in each relevant OA affected by the LLBCO. (Source: ONS)

OA E00020126 (Lorrimore Road): White British (36.2%), African (24.3%), Other White (10.9%)

OA E00020119 (Sutherland Square): White British (55.8%), Other White (14.6), Bangladeshi (8%)

OA E00020120 (Sutherland Square): White British (30.1%), African (24.4%), Other White (10.8%)

OA E00019978 (Liverpool Grove): White British (39.3%), Other White (18.8%), African (9.7%)

OA E00019987 (Aycilffe House): White British (50.2%), Any other ethnic group (9.7%), African (9%)

Languages

244,000 (79%) Southwark residents reported their main language to be English. This is comparable to London, where 76% of residents recorded English as their main language, but lower than across England (88% of the population).

Spanish is the most common main language other than English, spoken by 13,000 Southwark residents. 'All other Chinese' is the most common Asian language, while Somali is the most spoken African language of Southwark residents.

Of the 53,700 Southwark residents whose main language is not English, 10,200 (19%) cannot speak English well or have no English proficiency.

(Source: Census 2021 Profile: Ethnicity, National Identity, Language and Religion, Southwark Council)

covered by this data, white households were less likely to be in fuel poverty than households from all other ethnic groups combined. (Source: Ethnicity facts and figures: Fuel poverty, Department for Business, Energy & Industrial Strategy)

Home ownership

The English Housing Survey 2017-2018 found that 68% of White British households owned their own home (outright or with a mortgage). The level of home ownership is lower among all other ethnic groups except Indian and Mixed White/Asian. The level of home ownership is lowest among Black African and Arab households (20% and 17% respectively). (Source: Ethnicity facts and figures: Home ownership, Ministry of Housing, Communities and Local Government).

Mitigating and/or improvement actions to be taken	
<u>Public consultation</u> Those whose main language is not English may find it difficult to understand the LLBCO. To mitigate this, the Council can translate the LLBCO into different languages upon request. Also, illustrations have been produced to explain some conditions of the LLBCO graphically.	As there are no negative impacts, no mitigating actions are required.

Religion and belief - Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live for it to be included in the definition.	
Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	**Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)**
<u>Climate change mitigation</u> The LLBCO encourages the installation of solar panels to reduce carbon emissions and mitigate the effects of climate change. This will benefit all residents, regardless of their religion and belief. <u>Heritage conservation</u> The LLBCO includes a list of conditions to guard against harmful installations. This will protect the designated heritage assets and preserve the visual amenity of the local areas for the enjoyment of all residents and visitors, regardless of their religion and belief.	<u>Cost saving and reliable energy source</u> The LLBCO grants listed building consent for the installation of solar panels at grade II listed residential properties within the conservation areas, subject to conditions. Once installed, residents, regardless of their religion and belief, could benefit from reduced energy bills and a reliable energy source. <u>Home ownership</u> Works may be easier to carry out for home or freehold owners. Renters and leaseholders are less likely to pay for substantial works to a property or freehold they do not own. Home ownership varies greatly between religious and belief groups. The level of home ownership is below average among Muslims, Buddhists, and non-religious people. This means the LLBCO could be less of a benefit to these groups.
Equality information on which above analysis is based	**Socio-economic data on which above analysis is based**
<u>General data</u> In the relevant OAs, most residents either have no religion or identify as Christian. The percentage of residents who have no religion ranges from 24.9% to 45.9%. The percentage of residents who are Christian ranges from 36.8% to 50.2%. The second	<u>Home ownership</u> The 2021 Census found that 63% of people in England and Wales lived in households that owned their own accommodation (outright, with a mortgage, or shared ownership). Only 46% of Muslim people and 57% of Buddhist people lived in a household that

largest religious group is Muslim: 6.5%-9.3% of the residents identify as Muslim in the relevant OAs. This is reflective of the borough-wide data. (Source: Census 2021, ONS)	owned their own accommodation. For people of no religion the figure is 59%. The figure is higher than average for people who are Sikh, Jewish, Christian or Hindu. (Source: Religion by housing, health, employment, and education, England and Wales: Census 2021, ONS).
Mitigating and/or improvement actions to be taken	
As there are no negative impacts, no mitigating actions are required.	As there are no negative impacts, no mitigating actions are required.

Sex - A man or a woman.	
Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	**Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)**
Climate change mitigation The LLBCO encourages the installation of solar panels to reduce carbon emissions and mitigate the effects of climate change. This will benefit all residents, regardless of their sex. Heritage conservation The LLBCO includes a list of conditions to guard against harmful installations. This will protect the designated heritage assets and preserve the visual amenity of the local areas for the enjoyment of all residents and visitors, regardless of their sex.	Cost saving and reliable energy source The LLBCO grants listed building consent for the installation of solar panels at grade II listed residential properties within the conservation areas, subject to conditions. Once installed, residents, regardless of their sex, could benefit from reduced energy bills and a reliable energy source.
Equality information on which above analysis is based	**Socio-economic data on which above analysis is based**
General data The Census 2021 found that 51.6% of Southwark's residents are women and 48.4% are men. (Source: Census 2021) The percentages vary across the relevant OAs but only by a minimal extent.	N/A
Mitigating and/or improvement actions to be taken	
Public consultation Women may not feel safe attending consultation meetings at certain times of the day. A mix of methods, online and offline, will be used for public consultation such that people of both sex will be aware of and have a chance to comment on the draft LLBCO.	As there are no negative impacts, no mitigating actions are required.

Sexual orientation - Whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes	
Potential impacts (positive and negative) of proposed policy/decision/business plan; this also includes needs in relation to each part of the duty.	**Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative)**
Climate change mitigation The LLBCO encourages the installation of solar panels to reduce carbon emissions and mitigate the effects of climate change. This will benefit all residents, regardless of their sexual orientation. Heritage conservation The LLBCO includes a list of conditions to guard against harmful installations. This will protect the designated heritage assets and preserve the visual amenity of the local areas for the enjoyment of all residents and visitors, regardless of their sexual orientation.	Cost saving and reliable energy source The LLBCO grants listed building consent for the installation of solar panels at grade II listed residential properties within the conservation areas, subject to conditions. Once installed, residents, regardless of their sexual orientation, could benefit from reduced energy bills and a reliable energy source. Home ownership Works may be easier to carry out for home or freehold owners. Renters and leaseholders are less likely to pay for substantial works to a property or freehold they do not own. Home ownership levels vary between people of different sexual orientations. Data shows that lesbian and gay people in Southwark are more likely to own their own home (or live with someone who does) than heterosexual people, but for bisexual people this is much less likely. This means the LLBCO could be less of a benefit to bisexual residents.
Equality information on which above analysis is based	**Socio-economic data on which above analysis is based**
General data Across the borough, 8.08% of Southwark's residents identified as LGB+. This is the fourth highest figure of any local authority district in England and Wales.	Home ownership In the last census, 30.2% of heterosexual Southwark residents responded that they lived in a home that is owned by themselves or someone they live with (either outright, or with a mortgage, loan or shared ownership). For lesbian and gay people, this figure

In the BPW&JRS and WS MSOAs specifically, 9.36% and 7.49% of the residents identified as LGB+ respectively. (Source: Census 2021, ONS)	was 45.4%, but for bisexual people it was only 24.4%. For people who selected the 'all other sexual orientations' option, the figure was 16.7%. (Source: ONS)
Mitigating and/or improvement actions to be taken	
Public consultation People from the LGB+ community may be afraid to express their views in consultation meetings for fear of discrimination. A mix of methods, online and offline, will be used for public consultation such that people of all sexual orientations will be aware of and have a chance to comment on the draft LLBCO.	As there are no negative impacts, no mitigating actions are required.

Human Rights There are 16 rights in the Human Rights Act. Each one is called an Article. They are all taken from the European Convention on Human Rights. The Articles are The right to life, Freedom from torture, inhuman and degrading treatment, Freedom from forced labour, Right to Liberty, Fair trial, Retrospective penalties, Privacy, Freedom of conscience, Freedom of expression, Freedom of assembly, Marriage and family, Freedom from discrimination and the First Protocol
Potential impacts (positive and negative) of proposed policy/ decision/ business plan
In relation to First Protocol, Article 1 (Protection of property), the LLBCO would empower residents of eligible properties to install solar panels by removing the need to apply for listed building consent. The LLBCO would encourage the adoption of domestic solar energy, which helps reduce carbon emissions and mitigate the effects of climate change. Residents could also benefit from reduced energy bills following the installation of solar panels. The conditions attached to the LLBCO are designed to guard against harmful installations. This will protect the designated heritage assets and preserve the visual amenity of the local areas for the enjoyment of all residents and visitors. No negative impacts on human rights are expected to arise as a result of the LLBCO.
Information on which above analysis is based
All data illustrated in Southwark Plan Integrated Impact Assessment (February 2022) for Strategic Policy 2 Southwark Together, Strategic Policy 5 Thriving neighbourhoods and tackling health inequalities and Strategic Policy 6 Climate Emergency. The LLBCO contributes to IIAO6 ‘To reduce contributions to climate change’, IIAO11 ‘To protect and enhance quality of landscape and townscape’, IIAO12 ‘To conserve and enhance the historic environment and cultural assets’.
Mitigating and/or improvement actions to be taken
As there are no negative impacts, no mitigating actions are required.

Conclusions

Overall, the LLBCO will have no negative impacts on the equalities of residents in the two conservation areas. It will benefit residents of the eligible properties and the wider community, regardless of their protected characteristics.

The LLBCO grants listed building consent for the installation of solar panels at eligible properties subject to conditions. This would encourage the adoption of domestic solar energy, which helps reduce carbon emissions and mitigate the effects of climate change. This would benefit all residents and visitors, regardless of their protected characteristics.

Once installed, residents regardless of their protected characteristics would benefit from reduced energy bills. This would offer particular economic relief for young adults, disabled people and ethnic minorities, who are more likely to live in fuel poverty.

The LLBCO may be more of a benefit to those who own their home or the freehold and less likely to benefit renters or leaseholders. This is because the works may be easier to carry out for home or freehold owners. Renters and leaseholders are also less likely to pay for substantial works to a property or freehold they do not own. The LLBCO does not cause a negative impact to renters or leaseholders, but these groups are less likely to make use of the LLBCO.

The conditions attached to the LLBCO are designed to guard against harmful installations. This will protect the designated heritage assets and preserve the visual amenity of the local areas for the enjoyment of residents and visitors, regardless of their protected characteristics.

Members of the public will be able to give comments on the draft LLBCO during the consultation stage and any consultation feedback which is pertinent to the matters raised within the EINA will be taken into account for any further revisions of the EINA.

A mix of online and offline consultation methods will be used to enable all groups in participating in the public consultation. Those whose primary language is not English may find it challenging to understand the LLBCO. Mitigation measures to address this concern have been set out in section 5.

Section 5: Further equality actions and objectives

Further actions			
Based on the initial analysis above, please detail the key mitigating and/or improvement actions to promote equality and tackle inequalities; and any areas identified as requiring more detailed analysis.			
No.	**Description of issue**	**Action**	**Timeframe**
1	Ensure that the LLBCO is adopted within the shortest timeframe possible by the Council so that the benefits identified can be secured.	Progress the draft LLBCO towards public consultation and then final confirmation at Planning Committee.	Public consultation proposed to be agreed at Committee in July 2025.
2	Ensure that there is no language barrier preventing residents from understanding the LLBCO.	Upon request the Council can translate the documents into other languages.	Upon request

Photos of the conservation areas and listed buildings
(Note: This is a selection of photos and not an exhaustive list of listed buildings in the areas.)

Sutherland Square CA



Looking east on Sutherland Walk. No listed buildings in this part of the Sutherland Square CA.



Nos. 51a to 56 Sutherland Square (from left to right). All are grade II listed except no. 55a.



Looking east on Sutherland Square. Nos. 51a-55a on the right.



Butterly roof to nos. 55-56 Sutherland Square (grade II listed), visible from the rear.



Butterfly roof to nos. 58-60 Sutherland Square (grade II listed), somewhat visible from the rear.



Nos. 55-60 Sutherland Square (grade II listed).



Nos. 35-39 Sutherland Square (grade II listed).



Nos. 25-32 Sutherland Square (grade II listed).



Rear of nos. 30-33 Sutherland Square (grade II listed)



Rear of nos. 24-29 Sutherland Square (grade II listed).

Liverpool Grove CA



St Peter’s Church (grade I listed) in the distance.



Nos. 28-52 (even) Liverpool Grove (grade II listed).



Nos. 50-58 (even) Liverpool Grove (grade II listed).



Butterfly roof of nos. 42-52 (even) Liverpool Grove, visible from the rear.



Butterfly roof of nos. 52-58 (even) Liverpool Grove, visible from the rear.

Agenda Item 7.

Meeting Name:	Planning Committee (Major Applications) A
Date:	15 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

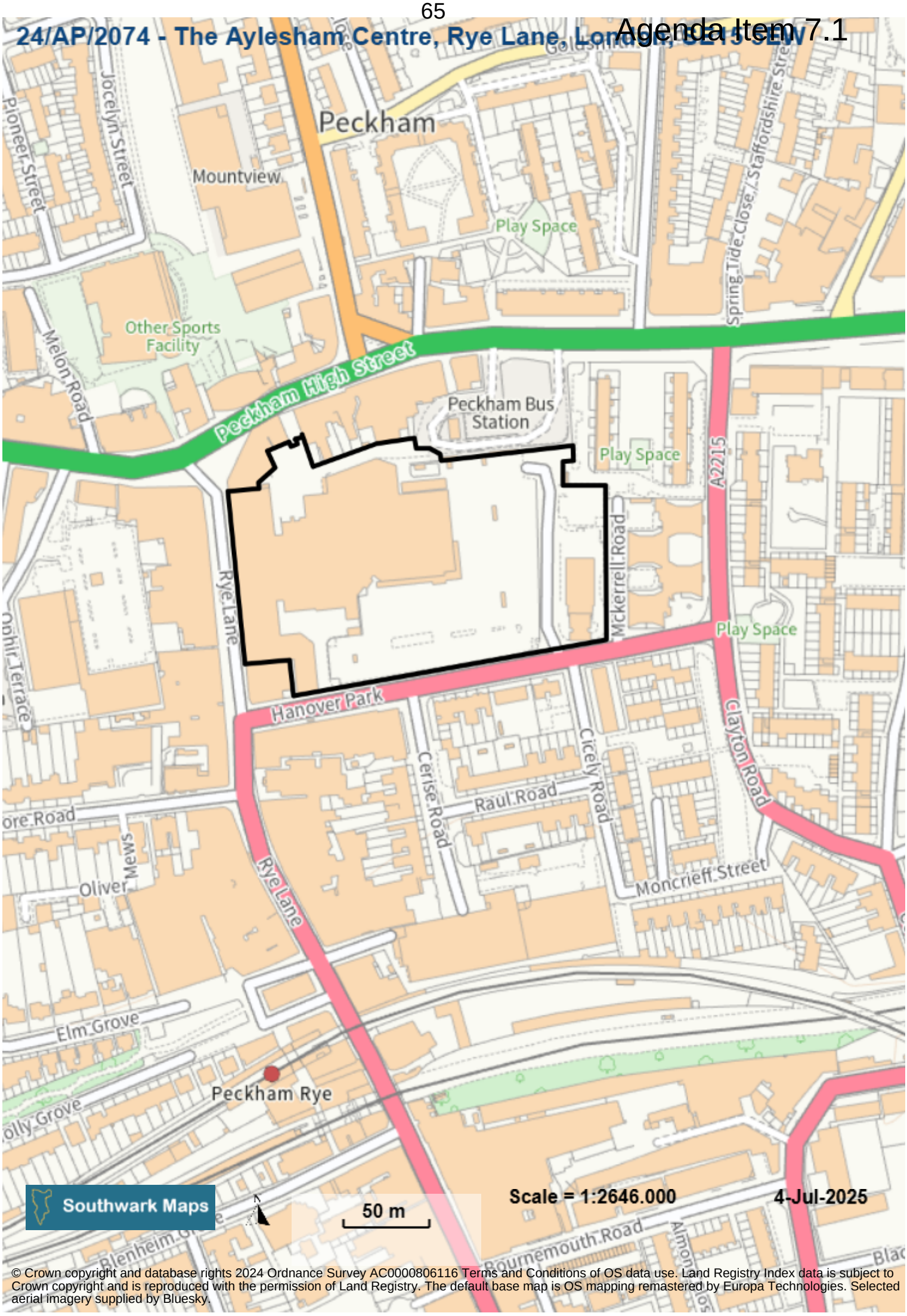
Background Papers	Held At	Contact
Council assembly agenda 23 May 2012	Constitutional Team 160 Tooley Street London SE1 2QH	Virginia Wynn-Jones 020 7525 7055
Each planning committee item has a separate planning case file	Development Management 160 Tooley Street London SE1 2QH	Planning Department 020 7525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

APPENDICES

No.	Title
None	

AUDIT TRAIL

Lead Officer	Chidilim Agada, Head of Constitutional Services	
Report Author	Alex Godinet, Lawyer, Finance and Governance Gregory Weaver, Constitutional Officer	
Version	Final	
Dated	7 July 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		7 July 2025



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Meeting Name*:*	Planning Committee (Major Applications) B
Date:	15 JULY 2025
Report title:	**Development Management planning application:** Application 24/AP/2074 for: Full Planning Application **Address:** The Aylesham Centre, Rye Lane, London SE15 5EW **Proposal:** Demolition of existing buildings and phased redevelopment to provide a replacement supermarket and associated service yard and car parking (Use Class E(a)), flexible retail, leisure (including drinking establishment), and commercial accommodation (Use Class E/Sui Generis), dwellings (Use Class C3), landscaping and associated works.
Ward(s) or groups affected:	Rye Lane
Classification:	Open
Reason for lateness (if applicable):	Not Applicable
From:	Director of Planning and Growth
Application Start Date: 03.09.2024	**Application Expiry Date**: 24.12.2024 (PPA date: January 2025)
Earliest Decision Date: 17.06.2024	

1. The council has received notice from the Planning Inspectorate that a planning appeal has been received on the grounds of 'non-determination' of the above application. The council is therefore no longer able to determine the application. A decision will now be taken by the Secretary of State via the Planning Inspectorate following the Inquiry procedure.

Recommendation

That the Planning Committee:

2. 1) Notes that an appeal for non-determination has been received in respect of planning application reference 24/AP/2074 which is a major application which would normally have been considered and determined by planning

committee (following referral to the Mayor of London) but will now be determined by the Secretary of State.

2) Notes that a planning inspector had been appointed to decide the appeal and that a planning inquiry has been listed with a time estimate of eight days commencing on the 27th October 2025.

3) Consider the officer report and endorse the following reason for refusal had the applicant not appealed against non-determination:

The proposed development, owing to the low level of affordable housing and the uncertainty regarding the delivery of Community Land Trust homes would fail to deliver sufficient public benefits to outweigh the heritage harm to the character and appearance of the Rye Lane Peckham Conservation Area, owing to the height, scale and massing of proposed blocks A, B and C. As such the proposed development would be contrary to paragraphs 212, 213 and 214 of the NPPF (2024), policies D1'Design, character and capacity for growth' and HC1 'Heritage conservation and growth' of the London Plan 2021, and policies P13 'Design of places', P20 'Conservation areas', P21 'Conservation of the historic environment and natural heritage' and site allocation NSP74 of the Southwark Plan 2022, and the Rye Lane Peckham Conservation Area Appraisal (October 2011).

4) Authorise officers to defend the appeal on the basis of the above reason for refusal, which would form the basis for the council's evidence at the Inquiry.

5) Notes that officers consider that it would be necessary for any s.106 obligation submitted in respect of the appeal to include the provisions set out in detail in the report.

6) Delegates authority to the Director of Planning and Growth to agree final s106 terms as he considers appropriate due to the likely time constraints in the appeal process which may prevent the matter being referred back to Committee for further consideration.

EXECUTIVE SUMMARY

3. The application before the committee relates to the Aylesham Centre in Peckham, which is a 1980s shopping centre with a range of independent and national chain shops, a Morrisons supermarket, a petrol station and a 353 space surface level car park. The site is subject to site allocation NSP74 in the Southwark Plan which requires a comprehensive redevelopment of the site including retail floorspace, new homes including Community Land Trust homes, new public realm and new routes through the site. Site allocation NSP74 also includes Peckham bus station which sits to the north, although this does not form part of the planning application. NSP74 gives an indicative residential capacity of 850 homes, and states that development of up to 20 storeys could be appropriate in this location.

4. In July 2024 Berkley Homes (Capital) Plc applied for full planning permission for redevelopment of the site comprising new retail floorspace including a new supermarket for Morrisons, new workspace and 877 new homes, all set around new public realm and new routes through the site. At that point the application included 35% affordable housing by habitable room, equating to 270 affordable homes, 185 of which would have been social rented and 85 would have been intermediate.

5. In December 2024 however, some amendments were made to the application, including minor alterations to the commercial floorspace, some minor elevational changes, a reduction in the number of homes to 867, and the proposed affordable housing was reduced from 35% to 12% by habitable room. The applicant advised that the reduction in affordable housing was due to uncertainty around the availability of GLA grant funding, not securing planning permission as soon as was hoped, build cost increases, regulatory changes, sales values remaining flat, and sale rates decreasing. The 12% affordable housing proposal would equate to 77 affordable homes, comprising 50 social rented and 27 intermediate homes. None of these affordable homes would be Community Land Trust homes, which is an explicit requirement of site allocation NSP74.

6. Whilst there have been over 50 comments in support of the scheme, the application has generated objections from over 2,500 local residents, businesses and community groups. Many of the objections raise concerns regarding the scale of the proposed development including the building heights, lack of affordable housing, impacts upon existing businesses including those currently operating from the site, and increased house prices and rents following the proposed development which would effectively price the existing community out of the area; these objections are set out in full later in this report.

7. The viability of the proposed development has been independently reviewed by BPS on behalf of the council, and whilst there are some differences in opinion regarding certain inputs into the FVA, BPS agrees with the applicant that the proposed development cannot currently support any affordable housing with standard inputs for profit. The 12% affordable housing proposed would therefore exceed the maximum viable amount that the development could support.

8. In May 2025, officers advised the applicant that the reduction in affordable housing meant that the public benefits of the proposed development would not be sufficient to outweigh heritage harm which would occur as a result of the proposed development. The western part of the site along the Rye Lane frontage sits within the Rye Lane Peckham Conservation Area, and the predominant building heights along the northern section of this street are 3-5 storeys. The application proposes to build up to seven storeys along this key frontage, and officers consider that this would be excessive, and would fail to preserve the character and appearance of this part of the conservation area. Shortly after this the applicant submitted a non-determination appeal to the Secretary of State on the basis that the council had not determined the application within the required timescale. As such the application will now be determined by the Planning Inspectorate, following an inquiry, and the council is no longer able to determine the planning application. Members are therefore

being asked to agree the grounds on which the council will defend the appeal i.e. what the reasons for refusal would have been had the council been able to determine the application.

9. This report sets out a full assessment of the application, and it is recommended that the council should seek to defend the appeal on one ground only. This ground is that the public benefits of the proposal would be insufficient to outweigh heritage harm which would occur to the character and appearance of the Rye Lane Peckham Conservation Area. As explained in the report, the key shortcomings in terms of public benefits are the reduced offer of affordable housing and the lack of Community Land Trust Homes (as expected by policy NSP 74). The Council has townscape concerns regarding the size of proposed block L facing the bus station (at 10-11 storeys high) although this would not cause any heritage harm.

10. The National Planning Policy Framework (NPPF) is clear that great weight should be given to a heritage asset's conservation irrespective of any harm, and that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use; this approach is echoed in the relevant London Plan and Southwark Plan policies. In this instance the harm which has been identified is considered by officers to be a medium to high level of Less than Substantial Harm, which would not be outweighed by the public benefits. Although the low level of affordable housing is underpinned by a viability assessment (which BPS do not substantively challenge) , the reduction in affordable housing is relevant to the assessment of the extent to which the proposal does deliver public benefit in accordance with the development plan led vision for the site. The amendments made in December 2024 materially reduced the amount of public benefit which the scheme delivers.

11. Whilst there are a number of other areas in which the proposed development would not fully comply with the development plan, in the main these could be overcome through the imposition of planning conditions or planning obligations (s106). Planning permission should not be refused for reasons which could be overcome by way of conditions, and to do so would put the council at risk of having to pay the appellant costs at appeal. In light of this, throughout the report officers have identified which issues could be addressed by condition, and which could be addressed by planning obligations. As part of the appeal process, officers will need to identify which conditions and planning obligations would be required if planning permission were granted on appeal, and the report therefore includes a list of the obligations which officers consider would be necessary. These will then have to be negotiated with the appellant as part of the appeal process.

Planning summary tables

12.

Homes	Private Homes	Private HR	Aff. SR Homes	Aff. SR HR	Aff. Int Homes	Aff. Int HR	Homes Total (% of total)	HR Total

Studio	4	8	0	0	0	0	4	8
							0.5%	0.3%
1b1p	86	132	0	0	0	0	86	132
							9.9%	4.7%
1b2p	252	574	0	0	2	5	254	579
							29.3%	20.5%
2-bed	308	1066	17	59	25	93	350	1218
							40.4%	43.2%
3-bed	140	702	15	75	0	0	155	777
							17.9%	27.5%
4-bed	0	0	18	108	0	0	18	108
							2.1%	3.8%
Total and % of total	790	2482	50	242	27	98	867	2822
	91.1%	88.0%	5.8%	8.6%	3.1%	3.5%	100.00%	100.0%

13.

Greening, Drainage and Sustainable Transport Infrastructure			
	Existing	Proposed	Change +/-
Urban greening factor	Unknown	0.38	+0.38
BNG uplift	1.72	3.26	1.54 (89.91%)
Green roof coverage	0 (zero)	5,550 sqm	+5,550 sqm
Electric Vehicle Charging Points	0 (zero)	28 on-site	+28 This means that 20% of the total (140) car parking spaces would be electric

Cycle parking spaces	Unknown	1,614 long stay 256 short stay	+ 1,614 long stay +256 short stay

14.

CIL and Section 106 (or Unilateral Undertaking)	
Criterion	*Total Contribution*
CIL (estimated)	£15,270,228.06 (pre-relief) £14,141,885.86 (post relief).
MCIL (estimated)	£ To be confirmed
Section 106 Contributions	As set out in the 'Planning Obligations' section of this report

BACKGROUND INFORMATION

Site location and description

15. The site is located in the heart of Peckham Major Town Centre which extends from Peckham Square in the north to Peckham Rye in the south. Peckham is a lively town centre which provides a range of daytime and night time activities including a library, a leisure centre, a cinema, market stalls, and many independent retailers, a lot of which specialise in West African goods. Much of the retail activity is concentrated on Rye Lane which is a bustling shopping street and a protected shopping frontage, with activity spilling over onto the busy side streets. There are also a number of religious buildings in the town centre, which further add to the activities taking place in the area.

16. Peckham has a burgeoning sector of small and medium sized enterprises, with a strong focus on creative industries. Many of these are located within the town centre including at Copeland Park, the Bussey Building, within some of the railway arches, and at Peckham Levels.

17. Peckham has a rich and diverse history, with much of the town centre forming part of the Rye Lane Peckham Conservation Area. There are a number of listed and locally listed buildings nearby, including the Baptist Chapel on Rye Lane (grade II) and the Jones and Higgins building which adjoins the site to the north (locally listed). The town centre is well served by public transport, including Peckham Rye rail station and a number of bus routes. Queens Road Peckham railway station is slightly further afield, to the east of the town centre.

Peckham Town Centre (pink = town centre boundary, blue = protected shopping frontages



18. This application relates to the Aylesham Centre which is located at the northern end of Rye Lane, on the eastern side of the street. The redevelopment of this site is a long held aspiration, having first been allocated for redevelopment in 2014 in the Peckham and Nunhead Area Action Plan (now rescinded), and more recently in the 2022 Southwark Plan. The Aylesham Centre is a 1980s shopping centre with associated servicing yard, 353 space surface level car park and a petrol station. The shopping centre is laid out as a number of retail units fronting Rye Lane, with the main entrance also from this street which leads to a covered retail arcade with a Morrisons supermarket at the end. There are 20 individual retail units within the shopping centre (including the supermarket), together with 10

carts which provide a range of retail services. The building is part single, part 2-storeys, and the upper floors of the building are in use as storage and ancillary facilities for the supermarket. The site measures approximately 2.7hectares.

19. Immediately adjoining the site to the north is Peckham Bus Station and the rear of properties on Peckham High Street which include an Islamic Centre, ground floor retail / commercial uses and residential uses on the upper floors. McKerrell Road is to the east of the site which contains a large building containing mostly key worker housing, with Purdon House (a residential building) to the north-east. Hanover Park is to the south of the site and the southern side of this street contains houses and flats, with a large retail unit at the junction with Rye Lane; the shopping street of Rye Lane is to the west.

20. The western portion of the shopping centre building sits within the Rye Lane Peckham Conservation Area, and the site is within the setting of the Peckham Hill Street Conservation Area.

Existing aerial view



Front elevation of the Aylesham Centre from Rye Lane



View of the Jones and Higgins building, looking south down Rye Lane



View of the car park and existing entrance to Morrisons



View of the trees and car park down McKerrell Road looking west. These trees have since been pollarded



View of corner building at junction of Rye Lane with Hanover Park, and view of site frontage along Hanover Park looking east





Views of bus station, from Peckham High Street looking south





21. The site is subject to the following designations in the Southwark Plan (2022):

- Site allocation NSP74
- Rye Lane Peckham Conservation Area
- Major town centre
- Archaeological Priority Zone (Peckham Village);
- Air Quality Management Area
- Borough view 1: The London panorama of St Paul's cathedral from One Tree Hill.
- Hot food takeaway primary school exclusion zone
- Hot food takeaway secondary school exclusion zone
- Protected shopping frontage

22. There are a number of trees along the southern boundary of the site which are protected by a Tree Preservation Order (TPO). The site has a PTAL rating of 6b and is located within Flood Zone 1 and a Critical Drainage Area.

<u>Site allocation NSP74: Aylesham Centre and Peckham Bus Station</u>

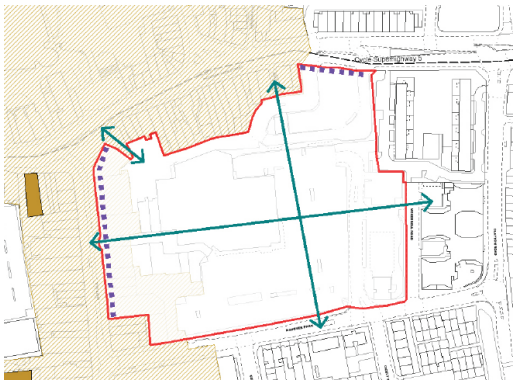
23. Site allocation NSP74 covers the application site and also extends northwards to include Peckham Bus Station. The site allocation states that redevelopment of the site must:

- Retain the supermarket use (E(A)); and
- Provide at least the amount of retail floorspace currently on the site;
- Retain bus station capacity; and
- Provide enhanced public realm and civic space; and
- Provide new north-south and east-west green links; and
- Provide active frontages with retail, community or leisure uses (as defined in the glossary) at ground floor facing Rye Lane and Peckham High Street; and
- Diversify and complement the existing retail offer in the town centre, with new opportunities for a range of shop sizes, including suitable space to attract a variety of retailers to Peckham; and
- Provide new homes (C3); and
- Provide new intermediate affordable housing through a community land trust.

Redevelopment of the site may:

- Accommodate meanwhile uses on the car park.

Site allocation NSP74 and proposed site plan





24. The site allocation gives an indicative residential capacity of 850 new homes. It also advises that comprehensive mixed-use redevelopment of the site could include taller buildings (subject to consideration of impacts on character, heritage and townscape), and that assessment of the site concluded that development of up to 20 storeys could be appropriate in this location. Of note is that whilst the site allocation includes the bus station, the bus station does not form part of the planning application.

25. A list of the relevant planning policies is contained in Appendix 1.

26. Southwark Law Centre has commented that the draft Peckham Area Character Study (December 2023) is a material consideration and should be taken into account. This document provides guidance and information for homeowners and developers including details of the character of the area, the planning context, the priorities, preferences and concerns of the local community, and an insight into market demand and trends to help a developer to tailor a project to meet the needs of potential buyers or tenants. Consultation on the document closed in March 2024 and whilst it provides useful guidance, it has not been formally adopted and there is currently no timetable for doing so. As such officers consider that it can only be afforded very limited weight.

Details of proposal

27. Berkeley Homes (Capital) Plc purchased the site in 2021 and has applied for full planning permission for a comprehensive, mixed-use development on the site following the demolition of all of the existing buildings and structures. The development would provide a range of uses comprising a new supermarket and associated 140 space car park, workspace, flexible retail, leisure and commercial space, drinking establishments, and 867 new homes. There would be new public realm, landscaping, parking, cycle storage, plant and servicing areas, and a range of other associated and ancillary works and structures. The application is accompanied by an Environmental Statement (ES).

28. A breakdown of the existing and proposed non-residential floorspace is set out below:

29.

Land use	**Existing GIA sqm**	**Proposed GIA sqm**	**Net difference GIA sqm**
Supermarket (use class E(a)) (excluding service yard, plant and car parking)	4,975.7	4,436 sqm	-539.7 sqm
Flexible retail, leisure, commercial (use class E(a-g)) and sui generis (drinking establishments)	5,109 sqm (in classes E(a-c) and sui generis only)	3,812.7 sqm	-1,296.3 sqm
Internal mall / atrium	1,392 sqm	0 sqm	0 sqm
Petrol station Sui generis	98 sqm	0 sqm	-98 sqm
Workspace	0 sqm	2,725.3 sqm	+2,725.3 sqm
Total	11,574.9 sqm	10,974 sqm	-627.9 sqm

30. At present the existing shopping centre has two external servicing yards and car parking and as they are external, they do not form part of the existing Gross Internal Area (GIA). The proposed development would internalise these uses by providing a basement car park and an internal servicing yard for the supermarket. When these uses are included, the total proposed supermarket floorspace would be 10,712 sqm comprising front and back of house spaces, plant space, service yard and car parking. It is intended that the existing Morrisons supermarket would remain, albeit in a new building on the site.

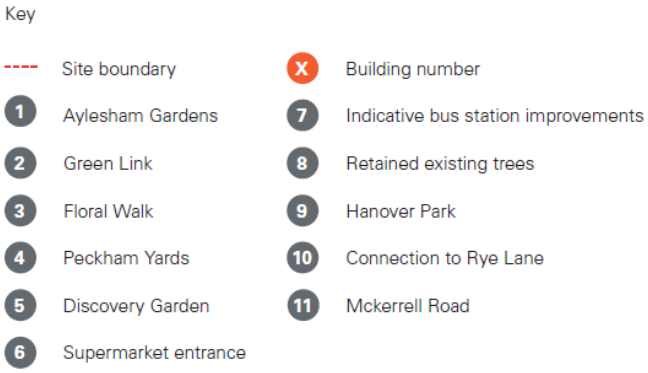
31. The proposed development would be laid out as a series of 16 buildings ranging from four to 20-storeys in height (maximum 78.4m AOD or 70.4m above ground

level), with a basement on the eastern part of the site. They would be set around new areas of public realm, some of which would also be used for servicing. The buildings would be broadly arranged around a diagonal east-west route through the site, together with three north-south routes.

32. The buildings would generally comprise retail uses on the ground floors with residential above, although there would be an entirely workspace building on the north-western part of the site. A new building for the supermarket would be constructed on the eastern part of the site and would be completed prior to the closure of the existing supermarket so that there would be continuous trading throughout the construction period.

Proposed site layout plan





33. Taking each of the proposed blocks in turn:

34. Blocks A, B, C – This would essentially be a single block which would sit parallel with Rye Lane on the western part of the site. It would be four to 7 storeys high (a maximum of 26.1m above ground level) and would contain 1,245.2 sqm (GIA) of flexible retail / leisure / commercial space on the ground floor together with ancillary and back of house space. The retail units in this block would essentially be double-fronted, and there would be two new routes through to the remainder of the site from Rye Lane. The upper floors of this block would contain 65 new homes which would be accessed from the rear, with private homes in blocks A and C and intermediate homes in block B. There would be a communal terrace at 5th floor level. The building would consist of glazed frontages; pink and green horizontal bands of metalwork and the upper floors would have coloured bricks.

Front elevation of proposed blocks A, B and C



35. Block D - This block would be located on the north-western part of the site and would be seven storeys high (a maximum of 25.8m above ground level). It would contain 2,725sqm (GIA) of workspace, together with back of house and ancillary space. The entrance to this building would be from Peckham Yards which would be the east-west route running along the north of the site. The building would be faced with white brick with white and dark grey mortar, together with black metalwork. There would be a communal terrace at 5th floor level. Building D would be constructed from 2 brick types, a dark red glazed brick and a white brick. Doors and window frames will be primarily dark grey / black metalwork but some would be dark red as to add interest.

Proposed front (north) elevation of block D



Building D - north-facing elevation

36. Block E - This block would be located to the south of block D, behind the Rye Lane frontage, and would be separated from block D by a 9.4m wide east-west route. It would be 11-storeys high (40.8m above ground level) and would contain 341sqm (GIA) of flexible retail space on the ground floor and 79 homes above. The building would be faced with brickwork of varying colours. Metalwork would also be used.



Building E - east elevation

37. Block F - This block would front onto Hanover Park and would be six-storeys high (22.5m above ground level). It would contain 207.5 sqm (GIA) of flexible retail space on the ground floor and 20 homes above. The building would be faced with different coloured brick on both the ground and upper floors. Each elevation of the ground floor could be different colour and this is highlighted below.



View across Aylesham Gardens (northern elevation)









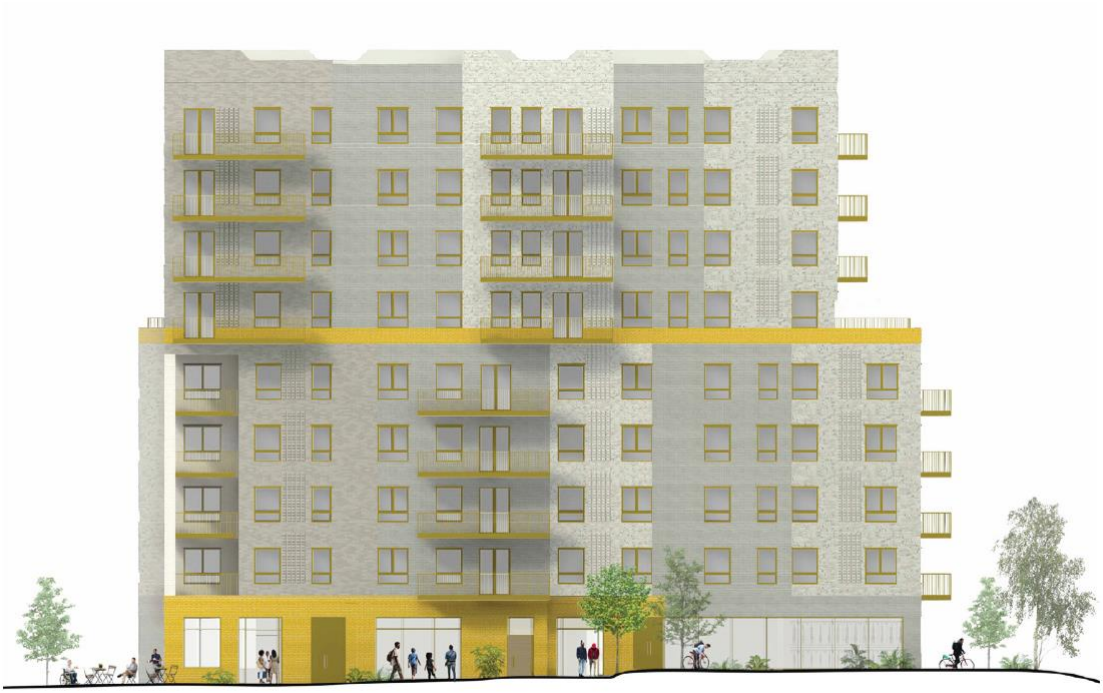
Image showing the different coloured elevations.

38. Block G - This block would be located broadly in the centre of the site and would adjoin block K. Both blocks would sit above a large podium which would have a shared communal terrace at first floor level. Block G would be 12-storeys high and would measure 43.6m above ground level. It would contain 276.2 sqm (GIA) of flexible retail space on the ground floor with 71 homes above, and there would be a communal terrace at 9th floor level. The building would be faced with white brickwork and page green metalwork for window framed and balconies.



Building G - west elevation

39. Block H - This block would be located on the southern part of the site close to Hanover Park. It would be nine-storeys high (32.5m above ground level) and would contain 224.2 sqm of flexible retail space on the ground floor and 43 homes above. It would be faced with brick colours. Dog-tooth bricks as well as inset bricks would also be utilised. The facades of the inset balconies to the north would be white brick.



Building H - west elevation facing onto Aylesham Gardens

40. Blocks J1 and J2 - This would essentially be a single block located on the southern part of the site, broadly in the centre; J1 would occupy the northern part of the block and J2 would occupy the southern part fronting Hanover Park. Block J1 would contain 125.3 sqm (GIA) of flexible retail floorspace on the ground floor with 108 new homes above, and J2 would be entirely residential, comprising 21 new homes. Block J1 would be 11-storeys high (55.2m above ground level), and J2 would be six-storeys high (22.6m). It would be faced with four brick colours which have a similar underlying hue. Coloured metalwork balconies and window frames would match the brick.



Building J1 is the taller of the buildings

41. Block K - This block would be located on the northern part of the site; it would adjoin block G and they would share a communal terrace. Block G would be ten-storeys high (36.6m) and would contain 1,259.4 sqm of retail space on the ground floor with 85 new homes above, and there would be a communal terrace at 6th floor level. The building would be faced with bricks of different colours as well as coloured metalwork. These could be orange, white and green.



Building K - north elevation

42. Blocks L, M, N, P and Q would sit around the edges of a large podium block on the east side of the site which would have frontages to the bus station, McKerrell Road, Hanover Park and within the site. The ground floor of this block would contain the supermarket including its servicing yard and car park, both of which would be accessed from Hanover Park. It would also contain a range of ancillary and back of house spaces including residential lobbies, cycle parking and refuse storage. On top of this podium block there would be a large communal garden which would be accessible to all of the new homes within the development.

43. Block L - This block would face the bus station and would be 10-11 storeys high (a maximum of 37.9m above ground level). At ground floor level it would contain a residential lobby, 16.5 sqm of flexible retail space, back of house space and cycle parking, and there would be further cycle parking at upper ground and mezzanine level. This block would contain 85 new homes and there would be a communal terrace at 9th floor level. It would be faced with different tones of orange brick and metalwork.

Proposed north elevation of block L



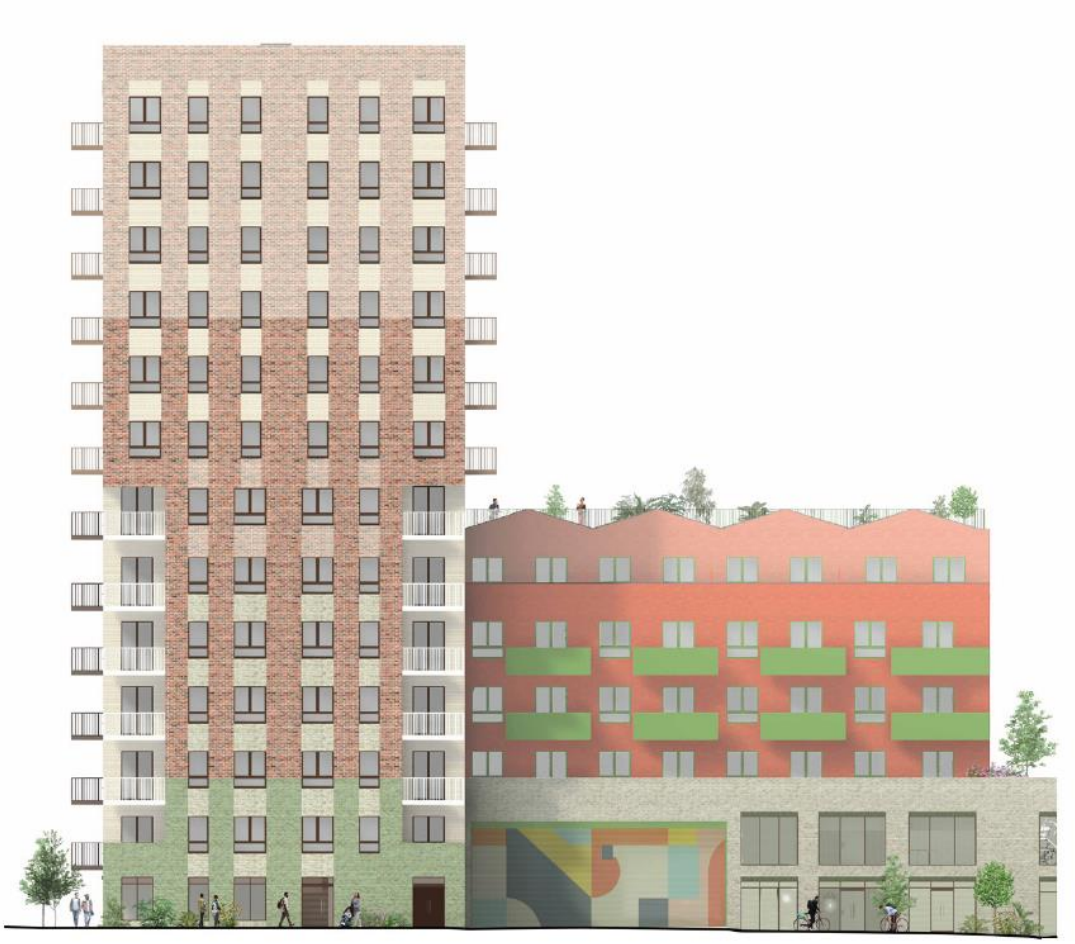
Northern elevation of Building L

44. Block M - This block would contain the supermarket lobby and back of house / ancillary space, with 149 new homes on the upper floors of the building. It would be 20-storeys high (a maximum of 70.4m above ground level) and there would be a communal terrace at 18th floor level. This block would be a gradient of white, grey and green brick colours.



Building M - west elevation

45. Block N - This block would front Hanover Park and would contain a 97.4 sqm flexible retail unit on the ground floor and 64 new homes above. It would be 13-storeys high and would measure a maximum of 43.3m above ground level, with a communal terrace at 5th floor level. This block would be faced with dark brown, red, green, white, orange and gold.



Building N - north elevation

46. Block P - This block would be located on the northern end of McKerrell Road and would contain a residential lobby and back of house space at ground floor level and 50 social rented homes above, one of which would be located at upper ground floor level. It would be 12-storeys high, and a maximum of 41.3m above ground level. It would be faced with contrasting grey bricks. The scheme would also utilise white and blue bricks as well as dark blue metalwork.



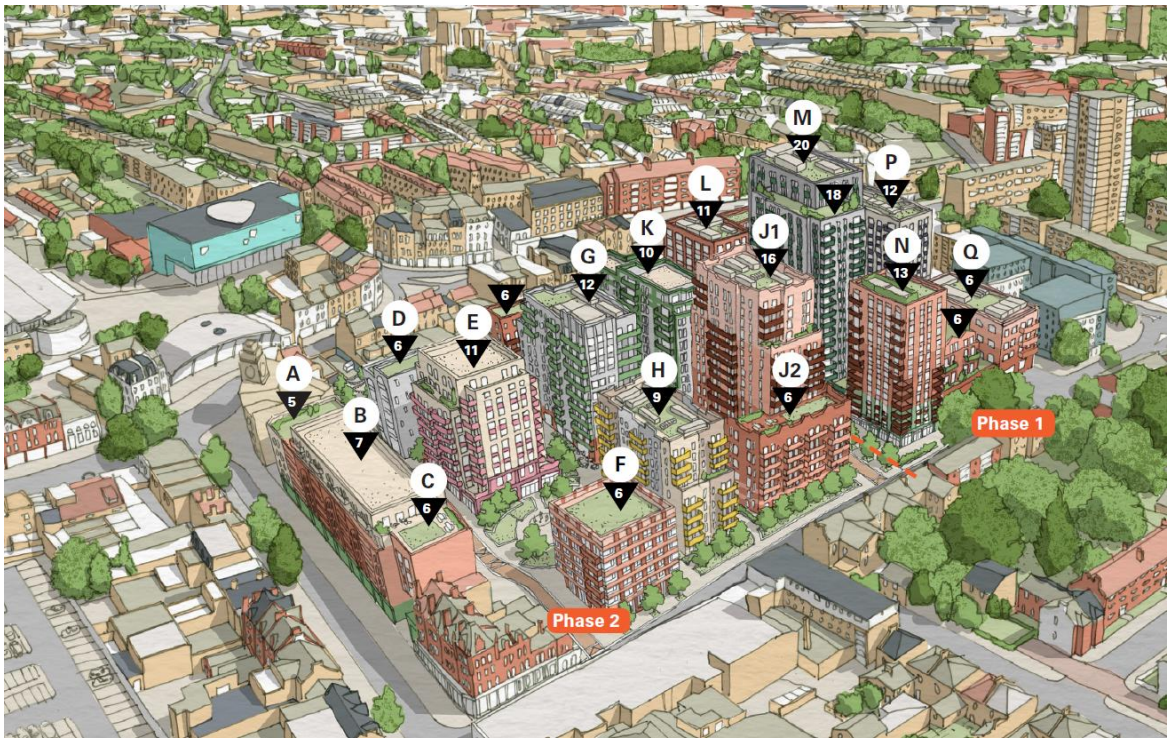
Building P - east elevation

47. Block Q - This block would sit at the junction of Hanover Park and Mekerrell Road. It would contain a residential lobby and back of house / ancillary space at ground floor level with 27 new homes above, including three at upper ground floor level, together with cycle parking. It would be six-storeys high and a maximum of 22m above ground level and would be faced with white and orange brick.

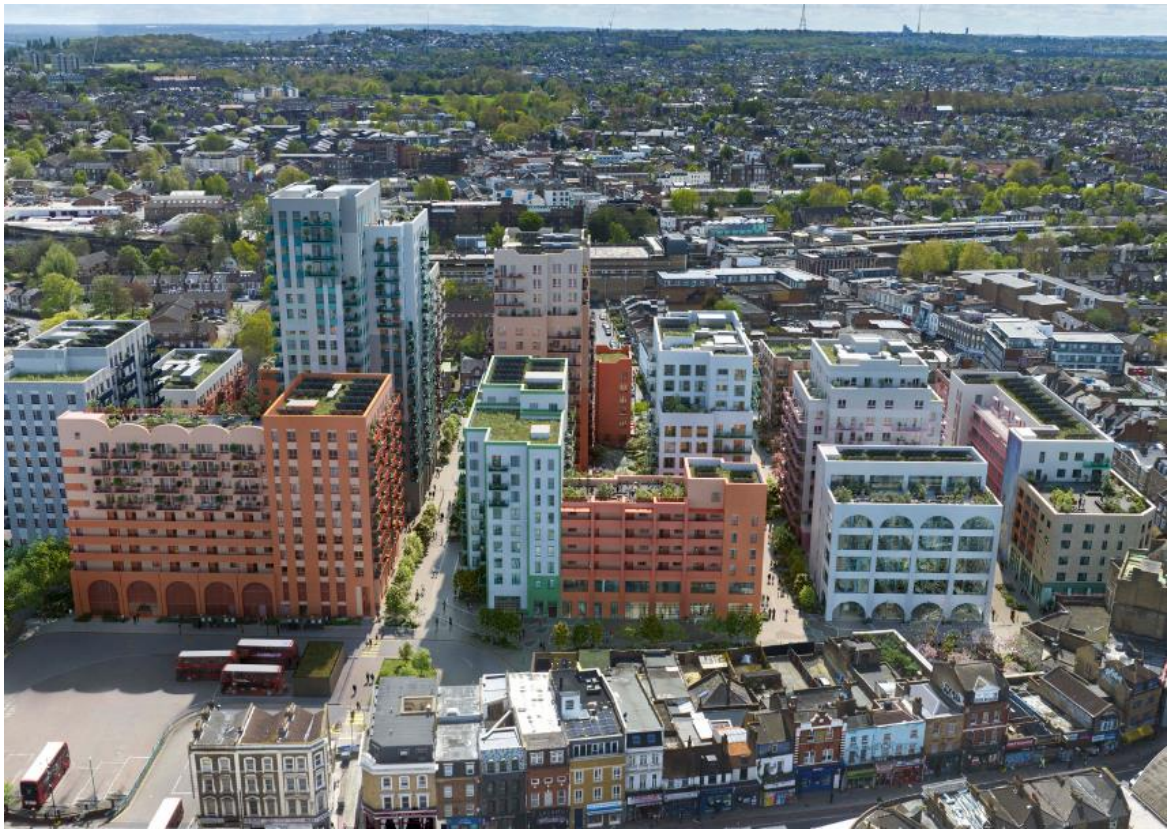


Building Q - east elevation

The following image shows the whole of the site and with the proposed heights of the buildings:



View of the site looking south:



48. Phasing – The proposed development would be delivered in two broad phases, in accordance with a plan which has been submitted with the application. Phase 1 would comprise blocks L, M, N, P and Q together with the proposed supermarket, all located on the eastern side of the site. Phase 2 would comprise demolition of the existing Morrisons supermarket and construction of blocks A, B, C, D, E, F, G, H and J. This phasing strategy is proposed to enable the replacement supermarket to be completed and Morrisons to move into it prior to the closure of the existing supermarket. The ES submitted with the application estimates that each phase would take 4 years to complete.

Amendments

49. In January 2025 the following changes were made to the application:

- A reduction from 877 to 867 homes;
- An amendment to some of the commercial areas (-14 sqm for the supermarket and +13 sqm for the flexible retail/ leisure/ commercial space);
- A reduction in the number of affordable homes from 270 to 77 homes (a reduction from 35% to 12% by habitable room);
- A change in the mix of new homes with consequent amendments to bin stores, plant rooms, cycle parking, amenity space and children's playspace;
- Changes to the elevation of block L at ground and first floor levels;
- Changes to the roof of the 18 storey part of block M.

50. A number of revised plans and supporting documents were submitted to show the above changes, together with information to address comments made by consultees and LUC which has reviewed the applicant's ES on behalf of the council. Amended plans were also submitted to reconfigure some balconies to block P so that they would sit fully within the application red line rather than slightly overhanging the adjacent pavement.

Relevant planning history

51. Details of the relevant planning history for the site and surrounding sites is set out in Appendix 2.

KEY ISSUES FOR CONSIDERATION

52. The council is no longer in a position to determine the application or issue a formal decision. The purpose of this report is to establish the grounds upon which the
council will defend the appeal which has been submitted on the basis of non-determination. Officers recommend that the members endorse the following putative reason for refusal:

The proposed development, owing to the low level of affordable housing and the uncertainty regarding the delivery of Community Land Trust homes would fail to deliver sufficient public benefits to outweigh the heritage harm to the character and appearance of the Rye Lane Peckham Conservation Area, owing to the height, scale and massing of proposed blocks A, B and C. As such the proposed development would be contrary to paragraphs 212, 213 and 214 of the NPPF (2024), policies D1'Design, character and capacity for growth' and HC1 'Heritage conservation and growth' of the London Plan 2021, and policies P13 'Design of places', P20 'Conservation areas', P21 'Conservation of the historic environment and natural heritage' and site allocation NSP74 of the Southwark Plan 2022, and the Rye Lane Peckham Conservation Area Appraisal (October 2011).

53. These matters are considered in full later in the report. The following other issues which are assessed in the report are considered to be in general compliance with the development plan and would not have raised grounds for refusal of planning permission:

- Principle of proposed development in terms of land use and compliance with site allocation NSP74
- Equality implications
- Environmental impact assessment
- Trees and landscaping
- Ecology and biodiversity net gain
- Mix of homes
- Wheelchair accessible homes
- Quality of accommodation
- Impact of proposed development on amenity of adjoining occupiers and surrounding area

- Transport impacts
- Air quality
- Ground conditions and contamination
- Flood risk and drainage
- Sustainable development implications
- Wind microclimate
- Fire safety
- Digital connectivity
- Archaeology
- Socio-economic impacts and health
- Planning obligations (S.106 undertaking or agreement)
- Mayoral and Borough community infrastructure levy (CIL)
- Community involvement and engagement
- Community impact and human rights

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

Legal Context

55. 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.

56. 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.

ASSESMENT

Principle of the proposed development in terms of land use, and compliance with site allocation NSP74

57. The National Planning Policy Framework (NPPF) was published in December 2024. At the heart of the NPPF is a presumption in favour of sustainable development, and the framework sets out a number of key principles, including a focus on driving and supporting sustainable economic development. The NPPF advises that permission should be granted for proposals unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, having particular regard to key policies for directing development to sustainable

locations, making effective use of land, securing well-designed places, and providing affordable homes, individually or in combination.

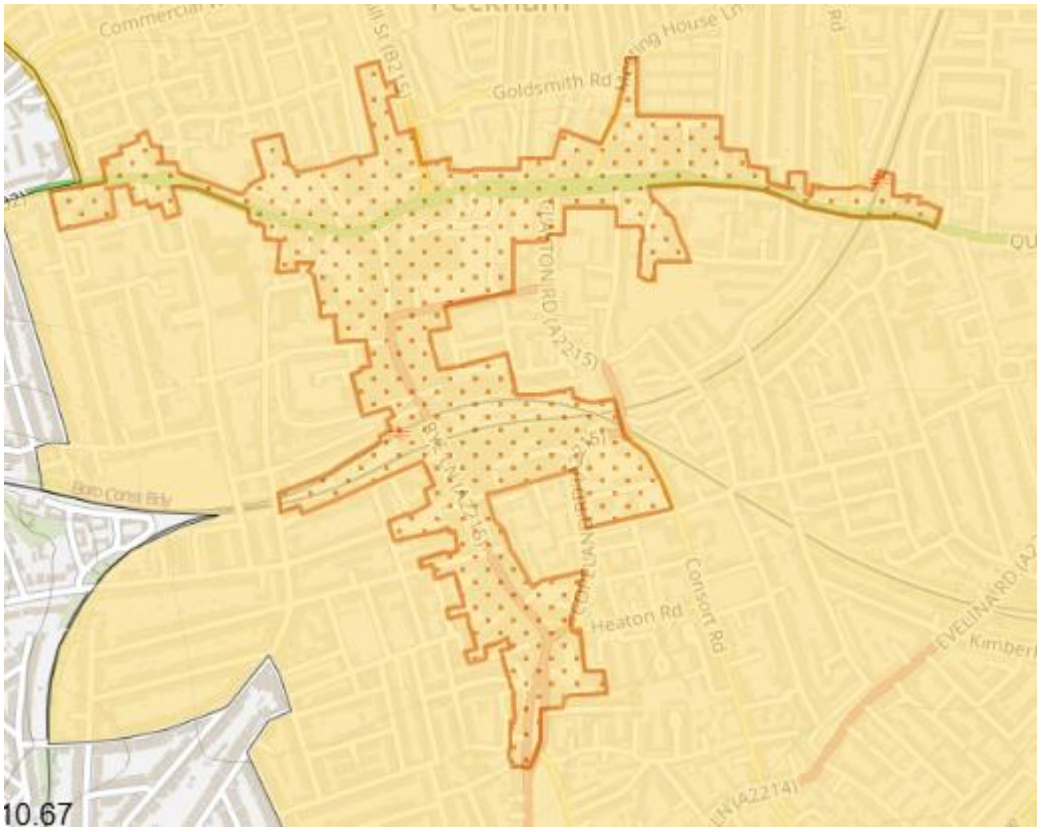
58. At borough level policy ST1 of the Southwark Plan 'Southwark's development targets' sets out targets including for housing, council housing, jobs, employment floorspace and retail floorspace. Further detail is provided in policy ST2 of the Southwark Plan 'Southwark's places', which sets specific targets for each of the Area Visions in the borough. Peckham has its own area vision (AV.14) as set out below, which requires 19,089 sqm of employment floorspace (i.e. an additional 15,378sqm), 23,281 sqm of retail, leisure and community use floorspace (an additional 7,139sqm), and gives an approximate housing capacity of 1,370 new homes.

59. Peckham Area Vision – The area vision sets out a number of criteria which development in Peckham should achieve. These include complimenting and improving the town centre with more large and small shops, market stalls, entertainment, cultural, community and leisure spaces alongside new employment space for small and medium enterprises including start-ups. Development in Peckham should provide as many homes as possible of all tenures including social housing, while respecting the local character and not compromising the operation of existing commercial and night time uses, particularly in the town centre.

60. The Area Vision goes on to set out support for new education uses, and that development should reveal and enhance Peckham's underlying historic townscape, increase or improve local open spaces and squares, prioritise walking and cycling, improve public transport, and improve servicing and waste management. Development in Peckham should contribute towards the development of the Low Line and the Peckham Coal Line by providing new public realm corridors adjacent to historic railway arches, with lively accessible spaces for creativity, new jobs and retail.

61. The site is also located in Peckham Action Area Core, the boundary of which is shown below.

Boundary of Peckham Action Area Core



62. Objections to the application raise concerns including a loss of retail floorspace on the site, failure to complment and diversify the existing retail offer, impact upon the existing businesses on the site, and indirect impacts of increased rents in the area following the completion of the proposed development. Representations in support include the creation of new jobs, amenities and public space, the mix of uses could simulate the local economy, and the proposal enhance Peckham's position as a thriving commercial hub.

63. Comprehensiveness – As set out earlier in the report, site allocation NSP74 includes the bus station but the planning application does not. The bus station is owned by Transport for London (TfL) and it is not currently known when it may come forward for redevelopment. As such officers have considered whether the proposed development would compromise the ability to deliver a cohesive development across both parts of the site allocation in the future, and the following requirements of NSP74 are considered to be particularly relevant in this respect:

64. - Retain bus station capacity; and
- Provide new north-south and east-west green links; and
- Provide active frontages with retail, community or leisure uses (as defined in the glossary) at ground floor facing Rye Lane and Peckham High Street

65. The impact upon the bus station is considered in detail later in the report in relation to transport impacts, and it is concluded that subject to the provision of a package of works to the bus station, its capacity would be retained. Agent of change principles are also considered later in the report owing to the proposal for

a large number of new homes in close proximity to the bus station, and it is concluded that the two uses could co-exist successfully side-by-side.

66. The proposed site layout would provide new north-south and east-west green links through the site, and the potential improvements to the bus station would enable these routes to extend beyond the site boundary providing connectivity to the wider area. The proposed development would not impact upon the ability to provide active frontages facing Peckham High Street as part of a comprehensive redevelopment of the bus station.

Retail floorspace

67. Section 7 of the NPPF relates to 'Ensuring the vitality of town centres' and paragraph 90 states that planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Paragraph 91 sets out a town centre first approach (the sequential test) for main town centre uses which are defined in the NPPF as retail, leisure, entertainment and more intensive sport and recreation uses, offices, arts, culture and tourism. The site is located within a town centre and there is an up-to-date plan in place; as such no sequential test is required.

68. The London Plan identifies Peckham as a major town centre; major centres are defined in the London Plan as those typically found in inner and some parts of outer London with a borough-wide catchment. They generally contain over 50,000 sqm of retail, leisure and service floorspace with a relatively high proportion of comparison goods relative to convenience goods. They may also have significant employment, leisure, service and civic functions.

69. There are a number of policies in the London Plan which relate to town centres, including SD6 which requires the vitality and viability of London's varied town centres to be promoted and enhanced, and sets out ways in which this can be achieved. Policy SD7 of the London Plan reinforces the town centre first approach and sets out criteria for development proposals in town centres, including that commercial floorspace relates to the size, role and function of the town centre and its catchment, that commercial space is fit-for-purpose including at least a basic level of fit-out, and that a range of commercial unit sizes are provided, particularly on larger-scale development. Policy SD8 of the London Plan advises that major town centres should be the focus of the majority of higher order comparison goods retailing whilst securing opportunities for higher density employment, leisure, and residential development in a high quality environment, and policy SD9 encourages a strategic and local partnership approach to develop strong, resilient and adaptable town centres

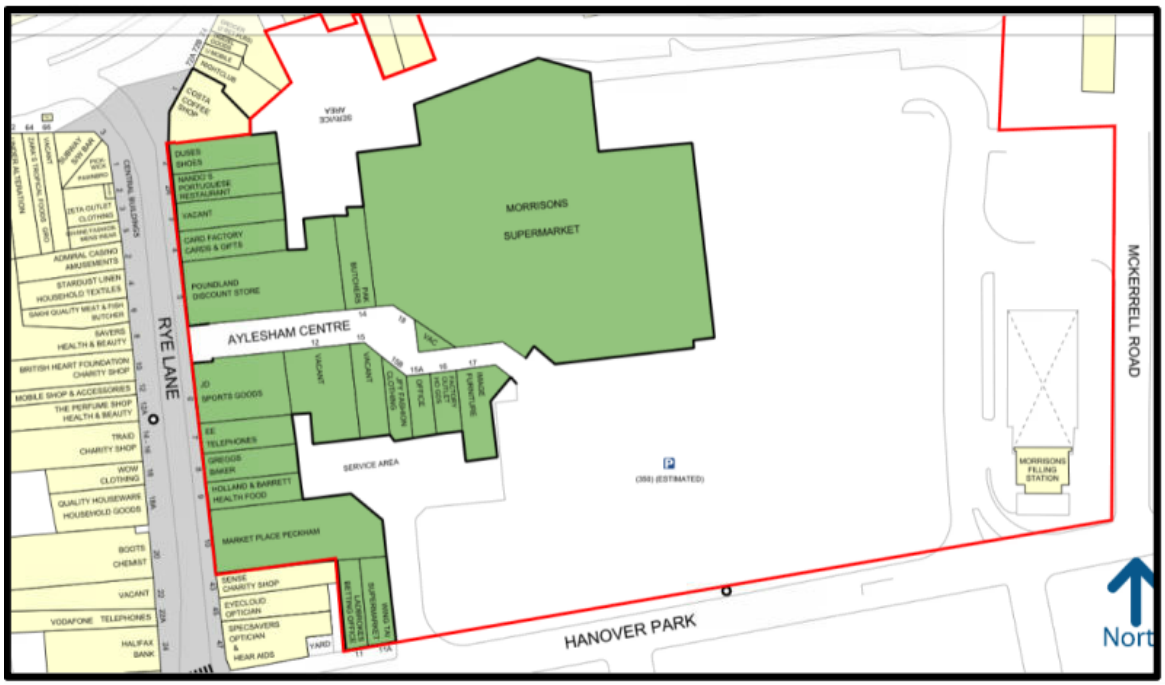
70. At borough level, policy P35 of the Southwark Plan also reinforces the NPPF town centre first approach and sets out a number of criteria for development in town centres. The Southwark Plan also contains policies on small shops, business relocation and protected shopping frontages and these are considered in detail later in the report.

71. The New Southwark Plan background paper : Retail and Town Centre Uses (December 2019) forms part of the evidence base for the 2022 Southwark Plan. It identifies Peckham as the borough's largest town centre in terms of the number of outlets and amount of retail floorspace, with a total retail provision of 56,630m² within 384 retail units; the split of retail uses is given as 22,280sqm of convenience retail, 27,270sqm of comparison retail, and 7,080sqm of food and drink uses. Peckham town centre contains a large number of small, independent shops with many specialising in West African goods, together with a high number of market stalls.

72. The Planning Statement submitted with the application also sets out the types of retail uses within the town centre, but using data from 2023. This includes a comparison with national average figures for town centres in the UK, together with a comparison of vacancy rates. It identifies that Peckham has a lower than average amount of comparison retail compared to other town centres (29.87% compared to 33.54%), that it has a higher than average amount of convenience retail (18.44% compared to 10.16% nationally), a lower than average amount of services (37.66% compared to 40.80% nationally) and a lower than average vacancy rate of 14.03% compared to 15.50%.

73. There is currently 10,182.9sqm (GIA) of retail floorspace on the site comprising the supermarket and the flexible retail uses (including sui generis uses), together with approximately 271m of protected shopping frontage. The protected shopping frontage spans Rye Lane and extends inside the shopping centre atrium. It is noted that the site allocation gives the existing retail figure as 11,420sqm, although this is in Gross External Area (GEA) as opposed to the applicant's GIA figure which is based on detailed surveys. The shopping centre is currently laid out as 20 retail units including the supermarket, together with 10 retail hand carts within the shopping centre atrium. The shops are a mix of independent businesses and national chain stores, and three units are currently vacant.

Layout of existing shopping centre (hand carts not shown)



Note: Unit 12 has subsequently been occupied by Clarks Shoes.

74. The proposed development would provide 10,974 sqm of main town centre uses, excluding the car parking and servicing areas. Concerns have been raised during public consultation on the application that workspace and sui generis uses do not form part of the site allocation requirements, and therefore the proposal would result in a loss of retail floorspace which would be contrary to site allocation NSP74. The council's Planning Policy Team has raised some concerns including the reduction in retail floorspace and the proposed Business Relocation Strategy. A local Church has requested some space within the development to provide services to the local community. However, there is no church use currently located on the site which would require business relocation support, therefore any space for this use would be a matter for discussion between the appellant and the church.

Retail impact and scale

75. Policy P35 of the Southwark Plan states that development must:

1. Ensure main town centre uses including markets, community, civic, leisure and cultural uses are located in town centres and local centres; and

2. Be of a scale and nature that is appropriate to the role and catchment of the centre; and

3. Retain retail floorspace or replace retail floorspace with an alternative use that provides a service to the general public, and would not harm the vitality and viability of the centre; and

4. Not harm the amenity of surrounding occupiers or result in a concentration of uses that harms the vitality, viability and economic growth of the centre; and

5. Provide an active use at ground floor in locations with high footfall; and

6. For large schemes for main town centre uses that are 1,000 sqm (gross GIA) or more provide free public toilets, public drinking fountains and public seating. Public toilets may be provided either on or off site and not reserved for customer use only.

76. The policy states that on new development in the Central Activities Zone, Opportunity Areas, Action Area Cores, Major and District Town Centres, retail uses (Use Class E(a), (b), (c)) will be secured through the implementation of conditions and/or planning obligations which will restrict change of use within Use Class E.

77. The Southwark Plan sets out the council's aim of expanding shopping space in its town centres. It identifies Peckham, Elephant and Castle, Canada Water, Old Kent Road and Peckham as having the most potential for growth, and supports the delivery of an additional 7,139sqm of retail, leisure and community use floorspace in Peckham town centre. The supporting text to policy P35 sets out that other activities and uses such as offices, community facilities, cultural uses and new homes will also help make Southwark's town centres more vibrant and independent, which will reduce the amount of trips people need to make to reach their local services and jobs. In addition to NSP74, site allocations NSP76 and NSP77 in Peckham also include requirements to deliver new retail floorspace.

78. As the additional circa 7,000sqm of retail floorspace has been tested through the Southwark Plan which is up-to-date, it is not anticipated that there would be any detrimental impact on the vitality and viability of any other town centres as a result of the proposed development. Moreover, it is noted that whilst there would be a broader range of uses on the site, there would be a reduction in retail floorspace as set out in detail later in the report.

79. Both policy P35 and site allocation NSP78 require the development to provide at least the amount of retail floorspace that is currently on the site, and the council's Planning Policy Team has confirmed that this means class E (a-c)(display or retail sale of goods (other than hot food), sale of food and drink for consumption (mostly) on the premises, and financial and professional services). At present there is 9,213sqm of such floorspace on the site within 18 of the retail units including the supermarket, and the table below sets out the existing and proposed provision.

Existing and proposed class E (a-c) floorspace

80.

Use	**Existing sqm (GIA)**	**Proposed sqm (GIA)**	**Difference sqm (GIA)**

Supermarket (excluding service yard, plant and car parking)	4,975.7 sqm	4,436 sqm	-539.7 sqm
Class E (a-c) including ground and first floor levels)	4,237.3 sqm	3,142.7sqm – 3,812.7 sqm (range due to caps on sui generis and class E(g) floorspace	-1,094.6 sqm to -424.6 sqm
Total	**9,213 sqm**	**7,578.7 sqm – 8,248.7sqm**	**-1,634.3 sqm to -964.3 sqm**

81. The above table shows that there would be a loss of class E (a-c) floorspace as a result of the proposal, ranging from 964.3sqm to 1,634.3sqm depending on how the flexible retail floorspace is used; the applicant wishes to use up to 350sqm of the flexible retail space as drinking establishments (sui generis) and up to 320sqm as workspace (use class E(g)). It is also noted that the ten hand carts add approximately 44sqm to the existing class E (a-c) provision and a further 68sqm arises from the consultation hub in unit 15A; this use benefits from temporary planning permission but must revert to class E (a-c) use by 8th February 2026 (reference: 23/AP/3555). These uses increase the existing class E(a-c) floorspace on the site to 9,325sqm (an additional 112sqm) and increase the loss of retail floorspace to up to 1,746.3sqm.

82. The loss of retail floorspace on the site would not comply with policy P35 of the Southwark Plan, although as explained later in the report officers do not consider that there would be any conflict with site allocation NSP74 in this regard. The application seeks to justify the proposed retail provision for a number of reasons, and incudes a Retail / Main Town Centre Use Strategy and a report by CF Commercial. These documents set out the need to ensure that the retail provision is flexible, that it can respond to retail trends which have emerged since the London Plan and Southwark Plan were prepared as well as to future trends,

the need to ensure a diverse mix of uses so that town centres are used at different times of the day and night, and to ensure that the development would be deliverable, with reduced potential for vacancies.

83. Whilst the proposed loss of retail floorspace on the site is noted, it is in part because of the inclusion of drinking establishments and workspace within the development, both of which are considered to be positive and would introduce greater commercial diversity on the site. Although these uses are not included in the site allocation, they are main town centre uses which would support the retail uses, encourage dwell time, create jobs and add to footfall at different times of the day and night. The proposed workspace would fall under class E (g) which comprises offices to carry out any operational or administrative functions, research and development of products or processes, and industrial processes; these are generally uses which can be carried out in a residential area without detriment to its amenity. Whilst these types of uses do not generally provide a service to the general public, the applicant has advised that they are likely to be maker type spaces which could generate some animation and activity, and they are considered to be acceptable in principle. However, if planning permission is granted on appeal officers would recommend a condition preventing class E(g) uses along the Rye Lane frontage in order to maximise the active frontages along this street in accordance with policy P37 of the Southwark Plan.

84. Also relevant to the proposed loss of retail floorspace is that NSP74 includes the bus station, and sets out a requirement for active frontages with retail, community or leisure uses at ground floor level fronting Peckham High Street. The site allocation therefore expects some retail uses to come forward on the bus station site where currently there are none. As set out earlier in the report it is not considered that the proposal would harm the redevelopment potential of the bus station or the ability to provide additional retail space on that part of the site allocation.

85. Overall, while there would be a loss of retail floorspace, , workspace and drinking establishment spaces would be positive additions to the town centre and officers do not consider that this should have formed a reason for refusing planning permission.

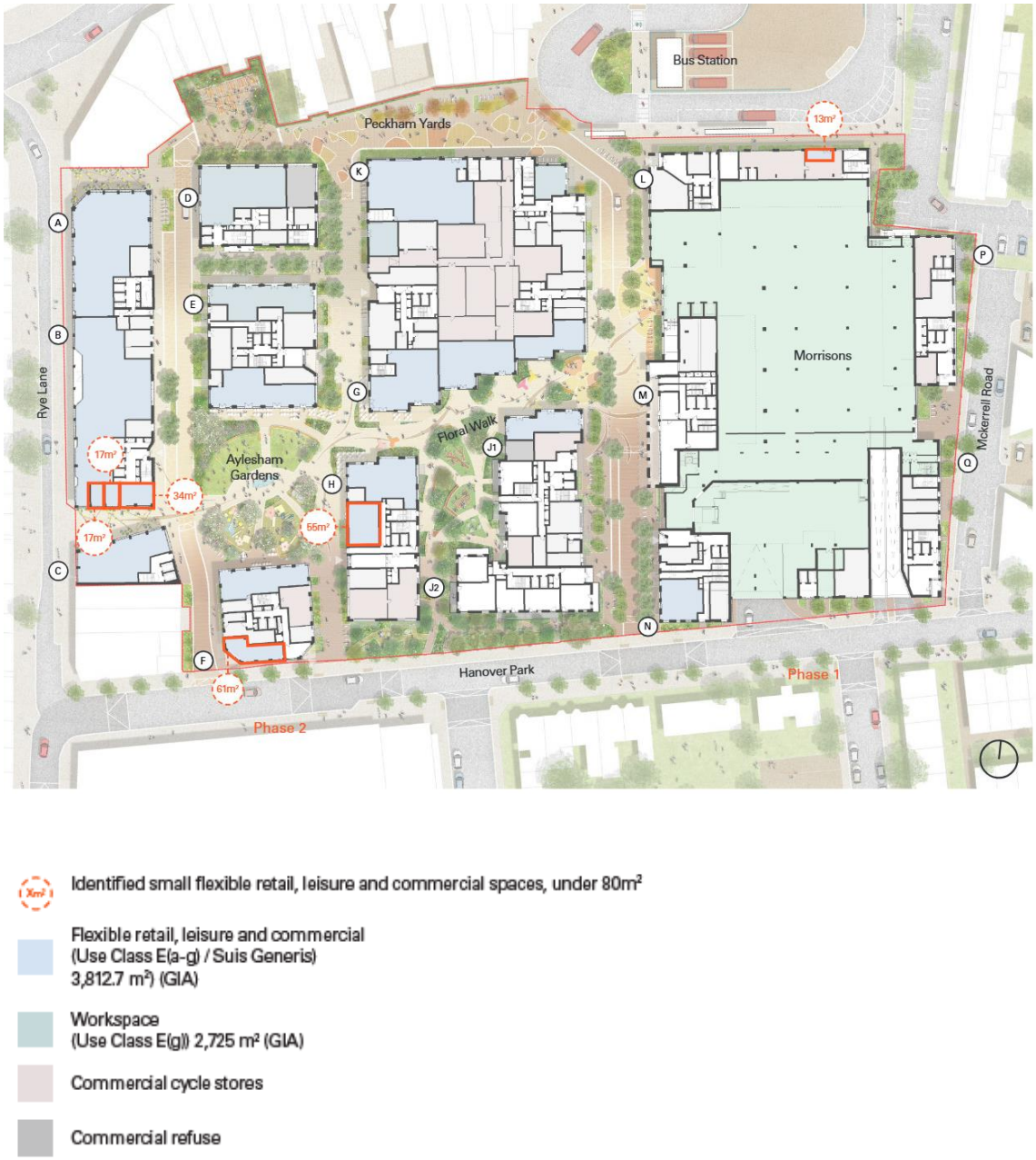
Location, size and mix of retail units

86. With the exception of block L which is considered further later in the report, the proposed location of the retail units on the site is considered to be logical. They would be focussed along the existing shopping street of Rye Lane and the main routes through the site, and the new supermarket would be visible from Rye Lane which would help to draw people in. The intention is to create a retail loop / circuit which would connect Rye Lane, Peckham High Street and the new supermarket. The retail uses would line the new public realm helping to activate it, and there would be spill out spaces for food and drink uses.

87. With regard to block L, officers consider that it would benefit from additional activation along its northern elevation facing the bus station. Whilst one small retail kiosk is proposed, the remainder of the ground floor would be taken up by a

residential lobby, cycle hub and back of house space. Additional retail along this frontage would increase activity and surveillance close to the bus station, where people often wait alone at night.

Proposed distribution of flexible retail space, workspace and supermarket (ground floor)



Identified small flexible retail, leisure and commercial spaces, under 80m²

Flexible retail, leisure and commercial
(Use Class E(a-g) / Suis Generis)
3,812.7 m²) (GIA)

Workspace
(Use Class E(g)) 2,725 m² (GIA)

Commercial cycle stores

Commercial refuse

88. With regard to the size and mix of retail units, policy E9 of the London Plan is relevant. This policy supports additional comparison goods retailing, especially in international, metropolitan and major town centres, convenience retail in all town centres, and requires proposals to enhance local and neighbourhood shopping facilities and prevent the loss of retail and related facilities that provide essential convenience and specialist shopping. Site allocation NSP74 requires

development on the site to diversify and complement the existing retail offer in the town centre, with new opportunities for a range of shop sizes, including suitable space to attract a variety of retailers to Peckham. Concerns have been raised by local residents that the proposal would not comply with this requirement, and
is geared towards more expensive shops and services which would be out of the reach of many residents.

89. There would be 11 flexible retail and sui generis units within the development which would range in size from 16.2sqm to 1, 259.4 sqm, with the supermarket and workspace in block D in addition to this. The size of the retail units have been informed by the retail studies appended to the Planning Statement, and have been flexibly designed so that they could be adapted to meet the size requirements of future occupiers. As such it is considered that this should make them attractive to a variety of retailers, including those selling comparison goods.

Supermarket use

90. Site allocation NSP74 of the Southwark Plan specifically requires the supermarket use to be retained. The existing Morrisons supermarket measures 4,975.7 sqm (GIA), excluding plant space, the external service yard and car parking. Measured surveys appended to the December 2024 Planning Statement show that the existing sales area is 3,230.5sqm, and it includes a pharmacy, click and collect facilities, dry cleaning, a laundrette, and publicly accessible toilets.

91. The proposed development would include a new supermarket which would comply with the site allocation. Excluding the servicing yard, plant space and car parking the supermarket would measure 4,436 sqm which would be 539.7 sqm smaller than the existing store; its sales area would be 2,252.92sqm which would be 977.58 sqm smaller than the existing Morrisons sales area. Whilst this reduction in size is noted, the size and specification of the store has been set by Morrisons, the intended operator, ensuring that it would function in a similar manner to the existing store including the number of checkout lines and the ability to undertake a ‘main’ food shop. Officers also note that the existing supermarket is an irregular shape, and the broadly rectangular shape of the new supermarket could make for a more efficient layout internally. The supermarket would continue to act as an anchor store for the site and the town centre, and its location on the eastern part of the site would allow for continuous trading throughout the construction process

92. In terms of facilities in the new supermarket, it is understood that they would be similar to the existing, although this would ultimately be a commercial decision for the operator. The supermarket would be connected to the basement car park via three large lifts located in the entrance lobby, and it would also contain publicly accessible toilets which would comply with the requirement in Southwark Plan policy P35. One local resident has raised concerns regarding the potential loss of the laundrette facility, and that the nearest alternative laundrette (Peckham wash and dry at 137 Peckham High Street) opens at irregular hours. In response the applicant has advised that Morrisons has not yet made a decision as to

whether a laundrette would be included, and that they expect to have a better understanding of demand for this as time goes on.

93. Overall the supermarket element of the proposal is considered to be acceptable and would comply with the requirement in site allocation NSP74. If planning permission is granted on appeal officers would recommend clauses within a s106 agreement to secure its delivery, together with a condition to secure the public toilets.

Proposed entrance to new supermarket



View of Morrisons customer entrance from Green Link

Small shops and affordable retail

94. Policy P32 of the Southwark Plan 'Small shops' states that development must retain small shops where existing small shops are at risk of displacement from a development. There should be full consideration of the feasibility of providing affordable and suitable space for existing occupiers in the completed development. Replacement shops should be like for like in terms of floorspace or bespoke to suit the requirements of the business, including provision of storage and servicing space. Part 2 of the policy requires developments proposing 2,500sqm (GIA) of retail space to provide 10% as small shops, which will be secured as planning obligations. Small shops are defined in the Southwark Plan as a market stall or shop measuring less than 80sqm GIA in floorspace (excluding storage). If the 10% requirement is based on the proposed class E(a-c) uses, then this would require between 314.27sqm to 381.27sqm of the floorspace as small shops.

95. There is currently only one unit within the shopping centre which complies with the small shop definition which is unit 15A, the temporary consultation hub, which measures 68sqm. However, the hand carts are considered to be similar to market stalls and would therefore also fall within this definition, which would increase the existing small shops floorspace on the site to approximately 112sqm.

96. The plan at paragraph 86 above identifies six proposed retail units which would measure less than 80sqm in size. They would range from 13sqm to 61sqm and whilst it would not be an exact fit, the 61sqm unit would be similar in size to existing unit 15A. This unit would be located in block F fronting Hanover Park, and should be suitable for a small business.

97. The six small retail units would provide 197sqm of small shop floorspace in total. This which would equate to between 5.1% and 6.2% of the proposed class E(a-c) floorspace, well below the 10% policy requirement. However, the Planning Statement sets out that the intention is to provide 10% of the retail space as small shops, to be secured by way of a condition. In light of this officers do not consider that this should have formed a reason for refusal, because it could be addressed by way a condition or obligation.

98. Southwark Law Centre has raised concerns that the report by CF Commercial indicates that larger operators would be provided with more preferable terms than affordable retail tenants. If planning permission is granted on appeal officers would seek to secure both on-site small shops and affordable retail space, to be offered in priority to the existing independent businesses on the site. This would require the submission of a small shops and affordable retail strategy (or similar) including details of the location, fit-out, rent levels and service charges. This strategy would need to be developed based on an understanding of the needs of the independent businesses, including what rent levels they could afford.

Business relocation strategy

99. Policy P33 of the Southwark Plan ‘Business relocation’ seeks to protect existing small or independent businesses or shops which may be displaced by development. Small businesses are defined in the Southwark Plan as those operating with 50 employees or less, and an independent business is defined as a business operating on no more than 3 sites. Where such businesses are likely to be displaced, part 1 of the policy requires a business relocation strategy (BRS) to be provided, written in consultation with affected businesses, and it must set out viable relocation options.

100. The applicant has submitted a Business Relocation Strategy together with an addendum. An objection received from the cart traders has raised concerns that they have not been included in the redevelopment process, that they constitute small shops which are afforded protection, that the impact upon small traders has been overlooked, that deferring discussions to a later date is not acceptable, and that the proposal would disrupt these businesses and jeopardize people’s livelihoods. Many of the objections received raise concerns regarding the adequacy of the BRS, including that it has not been written in consultation with

the affected businesses, and that it does not set out viable relocation options. SLC has commented that whilst it is recognised that the impact upon these businesses would be some time into the future, it is unacceptable to wait until after this moment and avoid full scrutiny of the support to be offered to them.

101. Officers agree that the BRS does not currently meet all of the requirements of policy P33 (part 1) because it has not been written in consultation with affected businesses and it does not set out viable relocation options. This is due to the timescales involved, which is explained further later in the report.

102. Part 2 of the policy requires the following to be included within a BRS:

1. Existing amount of non-residential floorspace (GIA) separated by use class, including vacant units and yards. This should include any floorspace demolished; and
2. Schedule of existing businesses operating on the site including business sector, estimated number of employees and lease terms; and
3. Proposed levels of non-residential floorspace (GIA) and yard space, separated by use class, business sector and estimated number of employees; and
4. Details of engagement with existing businesses on site regarding re-provision of premises or relocation options; and
5. Details of engagement with the council, local agents, businesses, business associations and workspace providers to secure occupiers for new employment space.

103. Officers have reviewed the BRS in consultation with the council's Local Economy Team (LET), and consider that it broadly complies with the policy requirements in relation to part 2 (1-3). It identifies the following existing businesses which would be considered independent under the Southwark Plan definition:

Unit 2 – Duses Shoes
Unit 11a – Wing Tai
Unit 14 – Pak Butchers
Unit 15B – Just for you
Unit 16 – Factory outlet
Unit 17 – Image (furniture)
Hand carts 1-10

104. Southwark Law Centre has raised concerns that the traders in Market Place are sole traders and therefore also meet the definition of small or independent businesses which should be offered relocation support. Market Place occupies unit 10 within the shopping centre, and is a sui generis use containing a number of individual food and drink kiosks. The objection refers to a recent Planning Permission for a scheme at Borough Triangle where individual traders operating under the Mercato umbrella have been offered relocation assistance which will be secured through a s106 agreement (reference: 24/AP/1958).

105. Given that these businesses are understood to be sole traders, officers consider that relocation assistance should be offered to them in addition to the businesses

outlined above. Concerns have also been raised that Eye Cloud opticians have not been included, but whilst this business adjoins the site, it does not sit within the planning application boundary.

106. With regard to part 2 (4) of the policy which requires details of engagement with the existing businesses, the BRS sets out that Tree Shepherd (a business engagement charity) has been appointed to work with the existing independent businesses. It advises that various events have been held including a workshop to discuss initiatives to support wider Rye Lane businesses, 1-to-1 discussions through door-knocking, pop-up events, and coffee morning events at the Aylesham Centre.

107. Officers requested additional information regarding the survey, and the applicant has advised that Tree Shepherd has conducted in person and digital surveys with all of the independent businesses including the hand carts, and that 21 survey responses have been completed, from employees and business owners. Of these, many have expressed a desire to remain on the site within the completed development (issues log). The BRS is intended as a live document to be updated over time, and further engagement would take place with the existing businesses in the future.

108. Part 2 (5) of policy P33 sets out the requirements for new employment floorspace, and this is considered later in the report in relation to the provision of workspace within the development.

109. Part 3 of policy P33 set out the details which are required where a business would be relocated within the new development (including details of fit-out, lease terms and temporary arrangements), and part 4 sets out the details which are required where a business would be relocated off-site. At present the applicant's BRS does not contain much information to address part 3 of the policy, and it provides some details of the assistance which would be available in relation to part 4. Details of the support proposed and the broad timescales are set out below:

- Continued engagement with the businesses to understand their specific needs (through Tree Shepherd)
- Provision of independent property agency services to assist the businesses in finding and negotiating a new premises;
- Connecting tenants with other professionals such as solicitors, planning consultants and contractors;
- Establishing a business relocation fund for financial support;
- Support for temporary retail space during construction works, potentially on the site;
- Exploring the provision of temporary and permanent covered space within the development for the hand cart traders. The permanent space currently being explored would be in Peckham Yards.

110. The BRS sets out the broad timescales for some of these measures as follows:

3 years to 1 year before Vacant Possession

• Berkeley Homes would identify which businesses qualify for relocation strategy support under policy P33;
• Berkeley Homes would identify which existing tenants could be accommodated during the construction phase (in the form of meanwhile use space) or can be relocated into a new unit space once the proposed development has been completed.

1 year to 9 months before Vacant Possession

• Tree Shepherd to update and recirculate questionnaire to understand the identified businesses specific relocation requirements;
• Berkeley Homes to introduce identified businesses to local agency services to help assist in the sourcing and negotiation of new business premises;
• The appointed agency would prepare a Site Options Report within the immediate and surrounding area. In line with policy P33, this would be prepared on a tiered system approach as follows:

• Identifying premises in Peckham;

• Identifying premises in Southwark;

• Identifying premises in neighbouring boroughs.

The report will contain the following information relevant to the business:

- Address
- Size
- Availability
- Rent and service charge (if available)
- If possible, a photograph of the premises

•The appointed agent would list business requirements on appropriate professional platforms and distributed within the market.
• The appointed agent would contact neighbouring large landlords within the vicinity of the redevelopment for space.

9 months before Vacant Possession

• Appointed agent to help advise tenant on preparation and negotiation of Heads of Terms;
• Berkeley Homes to monitor tenants who have issued break notices to their existing contract so that they can move into their new premises.

111. Business relocation fund - The applicant has offered to set up a relocation fund for the existing independent businesses. In the event that planning permission is granted on appeal, officers would recommend that this should be £200,000. This figure has been provided by the council's Local Economy Team and reflects the number and type of businesses based on reasonable estimates

of costs relating to professional advice, capital costs including towards fit-out and signage, a per day cost reflecting loss of time to traders when searching for locations, relocating, restocking and other reasonable costs; of note is that this does not indicate a flat rate for each business, and payouts to each business should be on a case-by-case basis.

112. Overall whilst the Business Relocation Strategy does not currently fully comply with policy P33, given the construction timescales involved, officers do not recommend that this should have formed a reason for refusal. With the exception of the Morrisons petrol station, all of the existing businesses are located in the shopping centre, which the applicant does not expect to have vacant possession of until January 2030 following the completion of the phase 1 works. Given that this is almost four and a half years into the future and the requirements of the businesses could change during that time, it is reasonable to have these detailed discussions closer to the time, provided that the businesses have sufficient time to plan for the change. If planning permission is granted on appeal, officers would seek to secure an ongoing Business Relocation Strategy as a planning obligation, and would also request that the following additional measures are secured:

- The s106 agreement should obligate the developer to notify the council 6 months in advance of the anticipated date of the closure of the shopping centre and confirm that the relocation fund is in place;

- A detailed construction management plan should be required which includes measures to minimise disruption to the existing businesses during the course of the building works;

- There should be no predetermined restrictions on which independent businesses can access the fund based on length of occupancy or statutory compensation;

- Allocation of money from the relocation fund should be overseen by the developer in conjunction with Tree Shepherd;

- Payments from the relocation fund could be put towards the cost of professional services such as solicitors and surveyors, advertising to ensure that customers know where businesses are relocating to, capital expenses such as shop fronts or fit out, and compensation for loss of trade during relocation;

- Provision of on-site affordable retail space / units.

113. <u>Proposed employment floorspace</u> – Section 6 of the NPPF ‘Building a strong, competitive economy’ states at paragraph 85 that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

114. Policy GG5 of the London Plan 'Growing a good economy' sets out ways in which those involved in planning and development in London must ensure that London's
global economic competitiveness is conserved and enhanced, and that economic success is shared amongst all Londoners. Policy E1 of the London Plan relates to offices and supports the delivery of new office space in town centres, and policy E2 supports the provision of a range of business floorspace to meet the needs of micro, small and medium-sized enterprises and to support firms wishing to start-up or expand. As set out above, policy ST2 of the Southwark Plan requires 19,089 sqm of employment floorspace (i.e. an additional 15,378sqm) to be provided in Peckham.

115. The proposed development would include 2,725.3sqm of workspace in block D, and the application seeks permission to use up to 320sqm of the flexible retail space as workspace, all falling within use class E (g). There is not currently any workspace on the site, and a number of objections received have commented that workspace does not form part of site allocation NSP74.

116. Whilst workspace is not specifically included in the site allocation, it is a town centre use and P30 (office and business development) encourages development in town centres to increase employment floorspace where it would deliver a number of benefits which have been outlined earlier in the report. It would contribute towards the additional 15,378sqm of employment floorspace which policy ST2 of the Southwark Plan requires in Peckham, and is estimated to generate between 155 and 174 jobs.

117. Quality of employment floorspace – The Design and Access Statement sets out that that block D has been designed as flexible co-working space, which could be subdivided depending on user requirements, and all floors would have openable glazing and access to the roof terrace. Overall the quality of this block is considered to be acceptable.

118. Affordable workspace – Policy E2 of the London Plan requires proposals for new B1 floorspace (now class E (g)) greater than 2,500 sqm (GEA) or a locally determined lower threshold to consider the scope to provide a proportion of flexible workspace suitable for micro, small and medium-sized enterprises. Policy E3 of the London Plan relates to affordable workspace and the use of planning obligations to secure affordable workspace at below market rates, and policy E8 requires the delivery of suitable workspaces to support the evolution of London's diverse sectors including start-up space and affordable workspace.

119. At borough level policy P31 of the Southwark Plan states that developments proposing 500sqm GIA or more of employment floorspace must:

- Deliver at least 10% of the proposed gross employment floorspace as affordable workspace on site at discount market rents; and

- Secure the affordable workspace for at least 30 years; and

- Provide affordable workspace of a type and specification that meets current local demand; and

- Prioritise affordable workspace for existing small and independent businesses occupying the site that are at risk of displacement. Where this is not feasible, affordable workspace must be targeted for small and independent businesses from the local area with an identified need; and

- Collaborate with the council, local businesses, business associations and workspace providers to identify the businesses that will be nominated for occupying affordable workspace.

120. The Planning Statement includes an Affordable Workspace Statement rather than a strategy, and it only provides very limited detail. The workspace building would be delivered in phase 2 of the development and the application sets out that 10% affordable workspace could be secured as a planning obligation. If planning permission is granted it is considered that a number of detailed obligations would be required, as follows:

121. • 10% affordable workspace to be provided;
• The affordable workspace to be secured for a 30 year term;
• No more than 50% of the market rate floorspace to be occupied until the affordable workspace has been fitted-out ready for occupation;
• Rent on the affordable workspace to be £27 per square foot (index linked) inclusive of service charge for the 30 year term. This currently equates to a 25% discount on market value as advised by BPS which is advising the council on viability matters;
• Flexible leases;
• Applicants for the affordable workspace must either have an existing small and independent business in Southwark or be a resident of Southwark and the proposed use must be from a specific sector which has a social, cultural or economic development purpose or to accommodate an existing occupier at the site;
• On completion, the affordable workspace must be marketed using a website, newspapers, agencies, managing agent, database, and external signage. It must be actively marketed for nine months to Southwark businesses and residents. Only if the space remains unoccupied after this period of marketing can it be made available to the same types of businesses outside of Southwark which would be permitted to remain in the affordable space, paying affordable rent, for up to five years. After those five years, the process would start again. During this time the existing tenant(s) could remain until a suitable Southwark tenant is found; • The day-to-day management of the space to be carried out by a suitably competent management company;
• Each unit to be equipped with mechanical and electrical fit-out, sprinklers, heating and cooling provision and kitchen and WC facilities.

122. A comment has been made by a neighbouring resident that there is currently a space in the Aylesham Centre where work by local artists is displayed. This appears to occupy part of unit 6, the remainder of which is occupied by JD Sports. The Design and Access Statement identifies an area to the north of the site close

to proposed block D where public art is proposed, and if planning permission is granted on appeal, officers would seek to secure a public art strategy through a s106 agreement, in accordance with policy P46 of the Southwark Plan 'Leisure, arts and culture'.

123. Provision of new homes – Section 5 of the NPPF relates to the delivery of new homes. Paragraph 125 (c) advises that "substantial weight" should begiven to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused. London Plan policies GG4 and H1 set out the importance of delivering new homes, setting a 10-year target of 23,550 new homes in Southwark. This is reinforced through the policies in the 2022 Southwark Plan, including policy SP1 'Homes for all'. There are currently more than 16,500 households on the council's housing waiting list, and more than 3,400 households living in temporary accommodation. Representations received in support of the application comment that the proposed development would turn car parking into new housing, and would contribute to housing targets.

124. The proposed development would deliver 867 new homes in a highly accessible location in Peckham town centre, and this would be in accordance with site allocation NSP74. The site allocation gives an indicative residential capacity of 850 homes and the proposal would exceed this by 17. Whilst this would not be a significant amount, as set out later in the report there are concerns regarding the height, scale and massing of blocks A, B and C fronting Rye Lane and block L which would face the bus station. However, in terms of land uses the proposed homes would be acceptable in principle and would comply with the site allocation; affordable housing and Community Land Trust homes are considered in detail later in the report.

125. Petrol station – Some objections to the planning application raise concerns regarding the loss of the existing petrol station. However, there are no policies in the Southwark Plan to protect this use and its retention does not form part of the site allocation. The move towards electric vehicles and localised charging points is also noted. The nearest alternative petrol stations are understood to be on the Old Kent Road to the north-east of the site.

126. Land use conclusion – The proposed development would result in a loss of retail floorspace compared to that which currently exists on the site, and would also include workspace and drinking establishments which do not form part of the site allocation but are uses supported by polices about development in town centres. For the reasons outlined in detail above, officers consider that the land uses proposed and quantum of floorspace are in compliance with the development plan read as a whole.

127. The application proposes a planning obligation to secure a detailed and ongoing Business Relocation Strategy, and officers consider that this approach would be acceptable because of the phasing of the proposed development and the fact that traders' circumstances may change in the time to the second phase of development. Other matters including the provision of publicly accessible toilets

and water fountains in the public realm could also be secured by a planning obligation, and it is considered that the proposal would be in overall conformity with site allocation NSP74 in terms of land uses. The only exception to this is the lack of Community Land Trust homes, and this is considered in detail later in the report in relation to affordable housing.

Equality implications

128. Peckham is a very diverse part of Southwark in terms of ethnicity, and this diverse population is reflected in the number of specialised shops and services in the area and contributes to its character and vitality. Many comments from local residents and community groups in response to public consultation on the application have identified that this unique and vibrant character is something which they value highly, and they are concerned that this would be eroded as a result of the proposed development.

129. Information gathered by the applicant to-date shows that people visit the site for a wide variety of reasons. The vast majority of people visit the site to go to the Morrisons supermarket, and other people go there to use the car park, to access other shops and businesses, to go to the bus station, for work, to meet and socialise with friends, and to undertake informal activities such as flyering.

Legal context

130. The Equality Act 2010 provides protection from discrimination in respect of certain protected characteristics namely: age, disability, gender reassignment, pregnancy and maternity, race, religion, or beliefs and sex and sexual orientation. Section 149 of the Equality Act 2010 places the Local Planning Authority under a legal duty to have due regard to the advancement of equality in the exercise of its powers including planning powers. Officers have taken this into account in the assessment of the application and Members must be mindful of this duty, inter alia, when determining all planning applications. In particular Members must pay due regard to the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act;

- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;

- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

131. There are also a number of planning policies which are relevant to equalities, including policy GGA of the London Plan ‘Building strong and inclusive communities’. Policy SP2 of the Southwark Plan ‘Southwark Together’ states that the council will continue to revitalise our places and neighbourhoods to create new opportunities for residents and local businesses, to promote

wellbeing, and reduce inequalities so that people have better lives in stronger communities.

132. This section of the report examines the impact of the proposal on those with protected characteristics and with a particular focus on the council's legal duties under s.149 of the Equality Act 2010. A range of issues are discussed below. One particular issue is the displacement of existing businesses. The proposed development would require the demolition of all the existing buildings on the site, albeit that this would take place in two broad phases. The existing businesses are all located within phase 2 of the proposed development, and as such would have to relocate prior to demolition works on phase 2 commencing. This raises a number of issues which are discussed in detail below, along with other equality issues.

Available material

133. A number of documents have been submitted with the application which are relevant to equality implications, including the ES, an Equality Impact Assessment (EQIA), a Statement of Community Involvement and the Business Relocation Strategy. The Tree Shepherd survey of the existing independent businesses is appended to the Business Relocation Strategy, and includes a number of questions which are relevant to equalities such as age, ethnicity, employees, customer base and provision of specialist goods or services. The appellant also submitted a follow-up email dated 4th June 2025 responding to some questions equalities questions raised by officers.

134. Concerns have been raised by SLC that the assessment of socio-economic impacts in the ES fails to consider and therefore mitigate against indirect impacts on the surrounding area, such as increased house prices, increased rents including commercial rents, and changes to the type of retail uses in the area. SLC has commented that the applicant's EQIA acknowledges this broader context and the potential impacts, but fails to offer any meaningful mitigation. SLC therefore considers that this results in a failure to meet the public sector equality duty. Many representations received following public consultation on the application refer to equality issues, including the wider impact of potentially increased commercial and residential rents and the loss of affordable food options following the closure of the Aylesham Centre.

135. The EQIA identifies a number of positive and negative equality effects which could arise as a result of the proposed development, and considers whether they would be disproportionate or differential. Disproportionate effects are described in the EQIA as where people with a particular protected characteristic make up a greater proportion of those affected than in the wider population. The EQIA explains that there may be a differential equality effect where people with a protected characteristic are affected differently to the general population as a result of circumstances, vulnerabilities or restrictions they face because of that protected characteristic.

136. Officers consider that whilst the applicant's EQIA provides a lot of general detail about the local area, which it defines as the Rye Lane and Peckham wards, it

does not provide focused detail about the owners and employees of the existing independent businesses. Additional information has however, been provided in the appellant's follow-up email, and a summary of the information gathered about them to date is set out below:

137.
- All of the respondents to the Tree Shepherd survey are non-white and come from a variety of ethnic minority backgrounds;
- 71% of the respondents to the survey are between 35 and 64 years old. Of these 48% are between 45 and 64 years old and as such fall within an older demographic;
- There are both men and women who own independent business on the site, but 62% of the survey respondents are male;
- Most survey respondents report having a religion, with 43% having Islamic beliefs and 24% having Christian beliefs;
- Some survey respondents state that their clientele includes a specific group e.g. women, black women or older people;
- Survey respondents were in favour of having options for small affordable spaces for them to relocate to;
- 86% of the business owners do not have any disabilities or long-term conditions.

138. The applicant intends to carry out further engagement with the independent businesses closer to obtaining vacant possession of the shopping centre in January 2030. Given that some of these businesses could relocate or close prior to this date for reasons not linked to the planning application, there could be equality impacts which it is not currently possible to identify. The following paragraphs set out potential equality impacts which have been identified to date. If planning permission is granted on appeal, officers would seek to secure a planning obligation requiring a detailed EQIA to be carried out specifically for the existing independent businesses closer to the time of any likely impacts. This could then inform the updated Business Relocation Strategy which officers would also seek to secure. This provision is necessary given the Council's continuing legal obligations under s.149 of the Equality Act 2010 and the fact that the impacts of relocation will need to be assessed in the circumstances which exist at the relevant time.

Affected groups

139. Potential adverse effects upon the following groups sharing protected characteristics have been identified within the applicant's EQIA:

- **Race** (differential and disproportionate effects upon existing businesses, their employees and customers)

- **Age** (differential effects during construction due to differential experiences of noise and air pollution, and impacts upon business owners and employees falling within an older demographic)

- **Disability** (differential effects during construction due to differential experiences of noise and air pollution)

- **Religion** (differential effects during construction on the ability to use the Islamic Cultural Centre on Peckham High Street for prayer and quiet contemplation)

Race

140. The EQIA sets out that 37% of residents in Peckham self-identify as being of Black ethnicity, compared to 25% in Southwark and 14% in London. In Peckham most of these residents identify themselves as African, particularly Nigerian, and Black Caribbean.

141. The EQIA advises that all of the independent business owners are non-white and come from a variety of ethnic backgrounds. As such based on the information currently available, people from ethnic minority backgrounds would be most vulnerable to the effects of the loss of their existing business premises.

142. The EQIA also identifies a Gypsy and Traveller site to the north of the site, at Springtide Close. It notes that feedback from Southwark Travellers' Action Group reports that the site is over-crowded, but that it is not anticipated that the site would be affected by the proposed development. Having reviewed the application, officers do not anticipate any adverse equality impacts upon this group.

Impacts on existing independent shops and businesses

143. There are a range of leases and lease statuses for the existing independent businesses which are set out in the Business Relocation Strategy; the leases expire between December 2025 and March 2033 and the hand cart traders operate under licenses. The objection from the hand cart traders advises that some of these businesses have traded from the site for over 20 years and serve the local community.

144. Adverse effects on the existing businesses could include temporary effects during relocation including the ability of their customers to access their goods and services and disruption to their businesses operations. Officers consider that there could be financial or other barriers to re-opening within the new development or within in the wider area, including commercial rents in the proposed development being higher than existing rents, and less suitable units for the types of businesses which they operate.

Impacts on employees of existing independent businesses

145. These employees may experience temporary or permanent loss of income and / or employment until relocated, and/or if their employer closes/downsizes/relocates elsewhere.

Impacts on goods and services

146. A number of the existing independent businesses serve the needs of people from a shared ethnic background, including an oriental supermarket, Chinese medicines and remedies, African textiles, accessories, dress-making and repairs, and a butcher's selling halal meat. However, there are a number of similar shops and services nearby, including an oriental grocery shop at 47 Peckham High Street, a shop selling Chinese medicines at 86 Peckham High Street, halal butchers along Rye Lane and African textiles and dress makers along Rye Lane and within Peckham market. A concern has been raised during public consultation on the application that the closure of the Aylesham Centre would result in the loss of affordable food options. However, there are considered to be a number of similar options available near to the site, including along Rye Lane.

147. The EQIA considers the loss or displacement of the other businesses operating from the site which do not meet the definition of being independent, including Poundland, Greggs and Morrisons. Owing to the ethnic make up of the local area these shops are likely to have a higher proportion of their customers from an ethnic minority background compared to the national average. The EQIA concludes however, that these shops are unlikely to provide a specialist or unique service to those customers and as such their potential loss or relocation is not considered to be sensitive from an equality point of view. Officers concur with this conclusion, and note that Morrisons would remain on the site and would continue to trade throughout the construction process.

Proposed mitigation

148. A number of mitigation measures are proposed, and these are set out earlier in the report in relation to land uses. In summary, the following mitigation measures are proposed:

149. Appointment of an independent business advisor - The applicant has appointed Tree Shepherd in order to engage with the existing independent businesses on the site and support them through the relocation process. Work in this regard has commenced, and if planning permission is granted on appeal officers would seek to secure Tree Shepherd's or a similar organisation's ongoing involvement throughout the construction process. The appointment of an independent business advisor would support the existing independent businesses on the site and in turn their employees, and should better enable them to retain their existing customer bases.

150. Business relocation fund - The applicant has offered to set up a relocation fund for the existing independent businesses and as set out earlier in the report, officers believe that this should be £200,000. If planning permission is granted on appeal, officers would seek to secure this.

151. Agency services- The Business Relocation Strategy sets out that the independent businesses would be provided with independent property agency services to assist them in finding and negotiating a new premises. The business owners would be connected with other relevant professionals such as solicitors, planning consultants and contractors.

152. Temporary and permanent accommodation - The Business Relocation Strategy sets out that the applicant would provide support for temporary retail space during construction works, potentially on the site. It also advises that the applicant is exploring the provision of temporary and permanent covered space within the development for the hand cart traders, with the permanent space potentially within Peckham Yards. If planning permission is granted on appeal, officers would expect these measures to be secured within a s106 agreement.

153. In addition to the above, the land use section of the report sets out a number of other measures which officers consider would be required if planning permission is granted on appeal. This includes the provision of affordable retail space within the proposed development. Whilst there is currently no guidance on what constitutes affordable retail space, it would need to be affordable to the existing independent businesses, including any service charges. The applicant has submitted a tenancy schedule dated 21st November 2024 which covers all of the businesses on the site except for Wing Tai and sets out the rents which they pay. If planning permission is granted on appeal the existing rent levels together with any findings from Tree Shepherd would be relevant to negotiating an appropriate cap on rent levels.

Age, disability and religion

154. With regard to age, the EQIA identifies that Peckham and Rye Lane has a higher proportion of people aged 20 to 35 than the London average, but it is similar to the proportion across Southwark. The proportion of working age residents (16 to 74) is similar to the Southwark and London averages, and there are slightly more people over the age of 75. The survey work by Tree Shepherd identifies that most of the independent business owners fall within an older demographic (aged 45-64).

155. With regard to disability, the EQIA advises that the proportion of residents in the local area who reported a disability was 15% which is slightly higher than the Southwark and London averages of 14% and 13%. The survey work by Tree Shepherd identifies that 14% of the respondents have reported disabilities or long-term conditions, which aligns with the London average.

156. With regard to religion, the EQIA advises that the proportion of residents in the local area who identify themselves as belonging to a religion is 60%, which is higher than Southwark average (56%) but lower than the London average (66%). The Tree Shepherd surveys reveal that 67% of the respondents have religious beliefs which is similar to the London-wide average. There are four churches and two mosques within 400m of the site.

157. The EQIA identifies that people sharing the protected characteristic of age and disability may have differential experiences of noise and air pollution during the construction period than the wider population. This is because these protected characteristics could make them more vulnerable to noise, and schools are noted in the EQIA as particularly sensitive; the nearest schools to the site are St James the Great school, Cherry Garden school (which is for children with special educational needs), John Donne primary school and Peckham Park primary school. Officers have identified that there could be disproportionate and differential impacts in relation to the age of the independent business owners, most of which fall within an older demographic. Older business owners may find it difficult to relocate or to access the support available to them.

158. Adverse effects have also been identified in relation to religion, as a result of noise and disturbance to the Peckham High Street Islamic Centre which adjoins the site. Noise and disturbance arising during the construction period could affect the use of this facility for quiet contemplation or during prayer times. Objections received refer to impacts based on religion / belief on the basis that businesses and spaces on the site serve religious and cultural communities, and that their loss would hinder access to services for specific groups, including those from faith-based communities that rely on culturally specific businesses. This has been considered above in relation to race, and given the broad range of alternative provision within the town centre and subject to on-site affordable retail space, it is not considered that any significant harm would arise.

159. The proposed mitigation outlined in the EQIA includes a Construction Environmental Management Plan (CEMP) and signing up for the Considerate Constructors scheme. As part of the CEMP noise levels and air quality would be monitored and mitigated as far as possible, although officers note that it would not be possible to mitigate these impacts entirely. The impacts would be temporary however, albeit that there is an estimated eight year build period. The applicant's
Demolition and Construction Environment Management Plan states that consultation would be carried out with various stakeholders including schools and youth groups. It does not include the Peckham High Street Islamic Centre and if planning permission is granted on appeal, officers would recommend that a CEMP is secured by way of condition or obligation, including a requirement for the applicant to consult this neighbour.

160. Objection letters have raised concerns that the equality analysis does not consider the impact of the loss of the covered space within the shopping centre on people with disabilities. The EQIA notes that whilst most people visit the site to use the Morrisons, people also visit for a variety of other reasons, one of which is to meet friends or socialise. It also sets out that pre-application feedback regarding accessibility issues has been received from a Community Champions Panel which was set up by the applicant, which includes a number of wheelchair users. Access to and safety and security around the bus station has been raised as a concern, and this is considered later in the report in relation to transport impacts.

161. As noted earlier in the report, the applicant is exploring the potential to provide covered space within Peckham Yards, although no details have currently been provided. The Design and Access Statement contains a section on 'Inclusive design principles' which sets out measures which would be incorporated into ensure an inclusive design for all. It also includes a separate access strategy which considers the needs of people with mobility impairments, visual impairments, people with neurodiverse requirements, deaf people, older people and small children. Measures proposed include step-free access to all buildings including the landscaped podiums, terraces and balconies, the provision of wheelchair accessible and adaptable homes with two lifts to all of the upper floors, an evacuation lift in each core to assist with the evacuation of people with disabilities, and accessible car parking, cycle parking and mobility scooter parking.

Wider socio-economic effects

162. Concerns have been raised by SLC that the application would not adequately mitigate wider socio-economic impacts which would arise as a result of the proposed development. This includes increased house prices and rent levels in the local area, including commercial rents, and that over time this could have the effect of pricing existing residents and businesses out of the area, especially those in the greatest need. This is a concern which has been echoed in the many objections received, particularly since the affordable housing offer was reduced from 35% to 12%.

163. The potential for increased rents and house prices in the area as a result of the proposed development has not been explored in detail in the application, although officers recognise that this is often an effect of large-scale schemes. This highlights the need to ensure that such schemes deliver sufficient affordable housing and where appropriate, affordable retail and workspace so that the local community can benefit from the development and not effectively be pushed out. In this instance there is also a specific requirement in site allocation NSP74 for Community Land Trust Homes. It is understood that these homes would be available to people living in the local community, helping to imbed the benefits of a scheme into the local area. As explained later in the report in relation to affordable housing, there are currently no Community Land Trust homes proposed.

Positive equality effects

New employment and training opportunities

164. The proposed development would create 271 construction jobs over the eight year build programme. Jobs within the completed development are estimated to range from 510-660 compared to 410-550 at present, therefore there could be a reduction of 30 jobs or an increase of up to 110. The EQIA advises that the majority of the jobs would be retail, restaurant and leisure based and that these are likely to be taken by local people. This is because 57% of the current retail workers on the site live within 5km of it.

165. Affordable workspace would be provided within the development, and the EQIA sets out that the applicant would implement an employment and training strategy which would likely disproportionately benefit young people. This would include the applicant's Future Skills Programme together with a training and employment strategy which would include paid internships and skills and training opportunities for the local community. The EQIA advises that this could have a disproportionate beneficial impact on local children and young people, and if planning permission is granted on appeal officers would recommend clauses within a s106 agreement to secure this strategy, including measures to ensure that those sharing protected characteristics are able to fully benefit from the opportunities on offer. This would be in order to address policy P28 'Access to employment and training' of the Southwark Plan.

Provision of new housing including affordable housing

166. The provision of a significant quantum of new housing on the site would contribute towards the council's housing target. The EQIA states that the provision of affordable housing would benefit older people and children, and there is a high proportion of people from ethnic minority backgrounds living in the local area. These groups could stand to benefit from the proposed affordable housing, and people sharing the protected characteristics of disability and age could benefit from the wheelchair accessible and adaptable homes. However, as set out later in the report the proposal for 12% affordable housing would be significantly below the minimum 35% expected in the London Plan and Southwark Plan, and the application does not include any Community Land Trust homes. The impact of this reduction in affordable housing (in the scheme as amended in December 2024) on those with protected characteristics is relevant to the assessment of the extent of public benefit delivered by the scheme. The implications of this for the planning balance are considered further in the conclusion and planning assessment below.

New public realm and playspace

167. The new public realm within the proposed development could particularly benefit disabled people and older people, with physical measures such as gentle gradients, resting places and high quality lighting incorporated into the design. New routes through the site would be created, providing better connections through and across the site, whereas currently access is through the shopping centre or the car park. Aylesham Gardens would create a place for social interaction, and childrens' playspace would be provided within the public realm and within the communal residential terraces.

Transport improvements

168. The proposed development would include wheelchair accessible car parking for some of the new homes, together with accessible and parent and child parking for the new supermarket. Accessible cycle parking would be provided, and if planning permission is granted on appeal officers would seek to secure

improvements to the bus station. As set out above, there would be improved connections through the site.

Improvements to safety and security

169. The EQIA identifies a number of positive effects in relation to crime, fear of crime and anti-social behaviour. This incudes more activity on the site including the new routes through it, areas for local public art, concierge and estate management presence, CCTV, passive surveillance from homes and balconies, and activation of the ground floor with uses operating at different times of the day and night. This could have benefits for people across all of the protected characteristics, particularly, younger people, older people, women and people with disabilities. If planning permission is granted on appeal, officers would recommend a s106 contribution towards mitigating impacts upon the council's CCTV network and an estate / public realm management plan.

Conclusion on equality implications

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

171. There is clearly the potential for equality impacts to arise in relation to race and age, which could particularly affect the existing independent businesses owners, their employees and customer base. It is difficult to be precise as to the exact number of Black and Minority Ethnic (BAME) owned businesses which would be affected, because if permission is granted, existing businesses could cease or relocate of their own accord prior to closure of the shopping centre. People sharing the protected characteristics of race and age may face more financial or other barriers to relocating or returning to the site and whilst the Business Relocation Strategy puts forward some measures to help to mitigate this, further work would be required in the future. The appellant has committed to continuing to engage with these businesses and if planning permission is granted on appeal, officers would seek to secure this through a s106 agreement, supported by an updated EQIA for the independent businesses.

172. Potential adverse effects could also occur for people sharing the protected characteristics of age and disability in relation to construction impacts, namely noise and air pollution. This is because these protected characteristics could exacerbate people's vulnerability to noise, and schools are noted in the EQIA as being particularly sensitive; potential adverse effects have also been identified in relation to noise and disturbance to the Peckham High Street Islamic Centre which adjoins the site. Mitigation is proposed in the form of a CEMP which would monitor noise, vibration and air quality, although officers note that it would not be

possible to mitigate these impacts entirely. The impacts would be temporary however, albeit that there is an estimated eight year build period.

173. Based on the information received to-date there could be a number of positive and negative equality impacts arising from the application, which must be taken into account. Officers consider that further commitments should be secured to support for the independent businesses on the site as outlined above, in order to safeguard and promote the objectives protected by s.149 of the Equality Act as far as reasonably possible. It is however, considered that these matters could be secured by way of a planning obligation and officers would seek to secure this in the event that planning permission is granted on appeal.

Environmental impact assessment (EIA)

174. The application is accompanied by an Environmental Statement (ES) dated July 2025. The ES has been independently reviewed by Land Use Consultants (LUC) on behalf of the council, and following the submission of additional information and clarifications, including an Environmental Statement Addendum (dated December 2024), most of the issues raised by LUC have been resolved. The outstanding matters relate to townscape, unexploded ordnance devices (UXO), and air quality, and these are explained later in the report.

175. Prior to the submission of the application the applicant requested a formal Scoping Opinion under Regulation 15 of the EIA Regulations, to ascertain what information the Local Planning Authority (LPA) considered should be included within the ES (application reference 24/AP/0111).

176. Applications where an Environmental Impact Assessment (EIA) is required will either be mandatory or discretionary depending on whether they constitute Schedule 1 (mandatory) or Schedule 2 (discretionary) development in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended). In this case the proposed development falls under Schedule 2, Category 10b ‘urban development project’ of the EIA Regulations where the threshold for these projects is development including one hectare or more of urban development which is not dwellinghouse development, or development including more than 150 dwellings, or development where the overall area of the development exceeds 5 hectares. Notwithstanding this, an EIA is only required if the development is likely to generate significant environmental effects having regard to the criteria set out in Schedule 3 of the Regulations, which include:

- the characteristics of the development;
- the location of the development; and
- the types and characteristics of the potential impact.

177. It is considered that the proposed development could generate significant environmental effects based upon a review of Schedule 3, and therefore an EIA is required.

178. Regulation 26 of the EIA Regulations precludes the granting of planning

permission unless the council has first taken the environmental information into consideration. The environmental information means the ES including any further information, together with any representations made by consultation bodies and any other person about the environmental effects of the development.

179. The ES must assess the likely environmental impacts at each stage of the development programme, and consider impacts arising from the demolition and construction phases as well as the impacts arising from the completed and operational development.

180. The 2017 EIA Regulations introduced a requirement for mitigation and monitoring of significant residual (i.e. after mitigation) adverse effects on the environment, which should be secured by planning obligations and conditions.

181. The submitted ES comprises the Environmental Statement Main Report (volume 1), a Heritage, Townscape and Visual Impact Assessment (volume 2), Technical Appendices (volume 3), and a Non-Technical Summary (NTS). Following amendments to the application and in order to address a number of consultee comments including from LUC, amendments were made and update reports were submitted pursuant to Regulation 25. The ES and ES Addendum set out the results of the EIA and provides a detailed verification of the potential beneficial and adverse environmental impacts in relation to the proposed development, including the following areas of impact (in the order that they appear in the ES):

- Demolition and construction
- Socio-economics
- Traffic and Transport
- Air Quality
- Noise and Vibration
- Daylight, Sunlight and Overshadowing
- Wind Microclimate
- Archaeology
- Ground Conditions and Land Contamination
- Climate Change and Greenhouse Gasses

182. Issues relating to aviation, ecology and biodiversity, health, land take and soils, light pollution and solar glare, project vulnerability, waste and water resources/ flood risk have been scoped out of the ES on the basis that no significant environmental effects would be likely to occur. Ecology, soil conditions, land contamination and waste are considered later in the report.

183. The 2017 EIA regulations introduced health as topic which must be considered. Health impacts are considered later in the report, and a separate Health Impact Assessment has been provided.

184. In assessing the likely environmental effects of a scheme, the ES must identify the existing (baseline) environmental conditions prevailing at the site, and the likely environmental impacts (including magnitude, duration, and significance) taking account of potential sensitive receptors. It further identifies measures to

mitigate any adverse impacts, and a summary of potential positive and negative residual effects remaining after mitigation measures is included in the ES in order to assess their significance and acceptability. The ES takes account of the phased nature of the development and considers the impact in each section of the ES.

185. The assessment of the ES and the conclusions reached regarding the environmental effects of the proposed development as well as mitigation measures (where required), are set out in the relevant section of this report.

186. The ES defines the scale of effects as follows:

- Major – These effects may represent key factors in the decision-making process. Potentially associated with sites and features of national importance or could be important considerations at a regional or district scale. Major effects may also relate to resources or features which are unique to a receptor and which, if lost, cannot be replaced or relocated.
- Moderate - These effects, if adverse, are likely to be important at a local scale and on their own could have a material influence on decision-making.
- Minor - These effects may be raised as local issues and may be of relevance in the detailed design of the project, but are unlikely to be critical in the decision-making process.
- Negligible - Effects which are beneath levels of perception, within normal bounds of variation or within the margin of forecasting error, these effects are unlikely to influence decision-making, irrespective of other effects.

The ES defines the nature of effects as follows:

187.
- Adverse - Detrimental or negative effects to an environmental / socio-economic resource or receptor. The quality of the environment is diminished or harmed.
- Beneficial - Advantageous or positive effect to an environmental / socioeconomic resource or receptor. The quality of the environment is enhanced.
- Neutral - Where the quality of the environment is preserved or sustained or where there is an equal balance of benefit and harm.

Geographic extent of effect:

188. At a spatial level, ‘site’ or ‘local’ effects are defined in the ES as those affecting the application site and neighbouring receptors, while effects upon receptors in the borough beyond the vicinity of the application site and its neighbours are at a ‘district / borough’ level. Effects upon Greater London are at a ‘regional’ level and those which affect different parts of the country, or England, are considered as being at a ‘national’ level.

Effect duration:

189. For the purposes of the ES effects that are generated by demolition and construction activities are classed as temporary, and further classified as short-term or medium-term depending on the duration. Effects from the completed and operational development are classed as permanent or long-term effects.

Direct and indirect effects:

190. The ES identifies whether an effect is direct, i.e. resulting without any intervening factors, or indirect, i.e. not directly caused or resulting from something else.

Effect significance:

191. Following the identification of an environmental effect, it's scale, nature, geographical extent and duration and whether it is direct, indirect, reversible or irreversible, the ES sets out whether the effect (pre-mitigation) is significant or not significant. Following identification of whether the potential or 'unmitigated' effects are significant or not, the requirement for any mitigation to either eliminate or reduce likely significant adverse effects has been considered. Where mitigation measures are identified to eliminate or reduce significant adverse effects, these have been incorporated into the proposed development or through measures such as management plans. The ES then highlights whether the 'residual' effect (i.e. after mitigation) would remain significant and generally classifies them as follows:

- 'Moderate' or 'major' effects are deemed to be 'significant'.
- 'Minor' effects are 'not significant', although they may be a matter of local concern; and
- 'Negligible' effects are 'not significant' and not a matter of local concern.

192. As set out above, additional environmental information or 'Further Information' was submitted during the course of the application and some of the plans have been amended; an ES Statement of Conformity setting out that the additional information does not alter the conclusions of the ES has therefore been submitted. In accordance with Regulation 25 of the EIA Regulations all statutory consultees and neighbours have been re-consulted in writing, site notices have been displayed and an advertisement has been displayed in the local press. The assessment of the ES and Further Information and the conclusions reached regarding the environmental effects of the proposed development as well as mitigation measures (where required), are set out in the relevant sections of this report, and alternatives and cumulative impacts are considered below.

Alternatives:

193. The EIA Regulations require that alternatives are explored with a view to reducing the significance of the environmental effects. The Alternatives and Design Evolution chapter of the ES presents the alternatives to the proposed development which the applicant has considered, and these are set out below:

- The No development/ do nothing scenario: The consequences of no redevelopment taking place on the site would result in a range of negative effects, namely being a lost opportunity to fulfilling the site's housing and employment generating potential and a lost opportunity in assisting with the fulfilment of site allocation NSP74. This option would also not deliver any benefits associated with the proposed development and has therefore been rejected by the applicant, with the reasoning for this considered to be appropriate.

- The alternative site option: As the site is owned by the applicant and is allocated for development in the Southwark Plan, no other alternative sites have been considered. Officers consider that this is acceptable.

- Alternative design: No reasonable or largely different alternative schemes or designs (as a whole for the site) have been identified by the applicant which would warrant a comparison of environmental effects. The ES advises that the proposed design would deliver the applicant's objectives and those of the site allocation and development plan. Officers view in this regard is set out in full in this report.

Residual effects:

194. Where significant effects are still likely to occur, additional measures have been proposed as to reduce the effects where practicable. Any effects that would remain once these measures are taken into account are reported as 'residual effects' and this has been addressed in each chapter of the ES.

Cumulative effects

195. The ES has considered the cumulative effects and for the majority, there would either be no significant or minimal impact. There are no cumulative schemes within 400m of the site so a cumulative assessment was not undertaken with regards wind/ microclimate. Given the siting and distances, air quality and noise/ vibration would also be negligible (not significant).

196. There would be benefits with regards socio-economy of the site with an example being an increase in the number of jobs on the site during construction and the increase in housing provision.

197. No cumulative effects have been tested in relation to daylight, sunlight and overshadowing on the basis that the neighbouring schemes identified would be too far away to have cumulative effects alongside the proposed development. Officers have reviewed this and concur with this assessment.

198. LUC when reviewing the ES raised a concern with regards the cumulative effects with regards archaeology. The documentation has however been assessed by the Council's Archaeologist and any harm could be addressed through

appropriately worded conditions were the application recommended for planning permission. This would therefore have a non-significant impact.

Conclusions of the EIA and ES:

199. The ES identifies a number of significant adverse effects which have been expanded upon in the relevant sections of the report. This includes some significant adverse effects in relation to noise during demolition and construction work, major adverse effects on daylight and sunlight to properties around the site, and significant effects in relation to built heritage and townscape. These impacts are all considered in the relevant sections of this report, including any required mitigation.

200. LUC has concluded that the ES meets the relevant legislative requirements, that the nature and magnitude of impacts are clear, and that appropriate mitigation measures have been set out. Officers consider that the ES is comprehensive, and concur with this conclusion.

Design, including building heights

201. Chapter 12 of the NPPF "Achieving well-designed places" at paragraph 131 states "Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities". Paragraph 135 requires planning decisions to ensure that developments meet the expectation of the NPPF as set out in points a-f, while paragraph 139 states that "Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes".

202. There are a number of policies in both the London Plan and the Southwark Plan which seek to secure high standards of design, including London Plan policies D1 'London's form, character and capacity for growth', D3 Optimising site capacity through the design-led approach and D4 'Delivering good design'. In the Southwark Plan policy P13 'Design of places' is particularly relevant. Heritage policies are set out later in the report in relation to heritage impacts.

203. Volume 2 of the ES is a Heritage, Townscape and Visual Impact (HTVIA) which sets out the findings of an assessment of the effects of the proposed development upon the heritage significance of above ground heritage assets, townscape and visual amenity. It includes a series of views of the proposed development as it would be seen from the surrounding areas, the locations for which have been agreed with officers. An addendum to the HTVIA has also been submitted, which considers whether changes made to the application affect the conclusions of the original ES, seeks to address comments made by consultees and LUC, and considers additional cumulative schemes i.e. developments on other sites which the appellant has identified. LUC requested an additional view from Cicely Road, however officers have reviewed this and consider that sufficient information has been submitted to assess the visual

impact from this street This includes a Vu City model which is an interactive electronic model of the proposed development which enables people to view it from the surrounding area.

204. Objections to the application raise concerns regarding the height, scale and massing of the proposed development, heritage impacts, and that the proposal would not be in keeping with the character of the area. Some representations in support of the scheme comment that much of the site is currently a car park, the proposed density of the development would be appropriate in zone 2, that the proposed height and massing takes account of the site location, and that the development should be taller to accommodate more housing.

The Masterplan (including height, scale and massing)

205. Extensive discussions have taken place with officers over the masterplan for the site, including layout, access, tall building location plus heights, and distribution of uses. The general masterplan for the site would be structured around two main routes, a north/south "green" route from the bus station to Hanover Park, and a route diagonally from Rye Lane to the bus station. These routes have been informed by a space syntax analysis which tracked people's movements across the site, and is considered to be a sensible layout which would meet the requirements of site allocation NSP74.

206. The site would be further sub-divided with a grid of development plots, the largest of which would be on the eastern edge of the site and would accommodate the re-located supermarket. This site would have a frontage both onto the internal north-south route and onto McKerrell Road. On the western edge of the site the existing Aylesham Centre frontage onto Rye Lane would be removed and replaced with a new line of three blocks to establish a new frontage onto Rye Lane. Within the site a 'loop' road would enable access and servicing across the site.

207. In addition, the main routes would traverse the main areas of public realm in the site. A principal garden space in the southwest quadrant of the site, the "Aylesham Gardens", and green route, the "Floral Walk" would form the north/south route and would provide the main landscaped areas across the masterplan, offering relief to the density of the development with high quality open space. There would also be open space to the north of the site (Peckham Yards) which would sit behind some of the properties on Peckham High Street. The planning application sets out that it is envisaged that the rear of these neighbouring buildings could have double-frontages in the future, so that they would also open out onto the site.

208. Reinstating the street to Rye Lane with a replacement frontage building with both the larger southern access to the street behind and the northern alley access is considered to be a natural fit. There would generally be a good distribution of active frontages around the edges of the site and towards the "Aylesham Gardens" and "Floral Walk" areas of the site. In the main the green landscaped

areas would be separated from service routes, limiting access to these only for maintenance and emergency vehicles, and ensuring that they could be as “green” and planted as indicated in the application.

209. With regard to the locations of taller buildings, the applicant’s team has worked constructively with officers to provide views from Peckham Road towards the Jones and Higgins building, and the taller buildings would be located towards the south of the site, leaving views of the head and shoulders of Jones and Higgins clocktower free from a clutter of buildings in the background when approached from the north and west.

210. There is also a general acceptability of the organisation of heights across the site, with no building above the 20 storey height limit set out in NSP74 and the taller buildings located on the eastern side of the site to preserve the protected borough view. In the main the heights of the blocks would be tapered down towards the edges of the site, including down to six-storeys on Hanover Park and 7-8 storeys along the northern edge of the masterplan. This careful articulation of height has ensured that, in the main, the masterplan would appear in the backdrop of the more historic townscape in a layered arrangement, with most of the taller elements masked by lower buildings in the foreground.

211. In this way the scheme has been shaped around views of Peckham form various approaches, although it is noted that the view from the nearby Bussey Building rooftop towards the city and St Paul’s Cathedral would be affected. The tallest buildings would however, be located on the eastern part of the site which would comply with the site allocation.

212. Views from Peckham Hill Street over the rooftops of the locally listed 100-105 Peckham High Street would be affected by the proposed development, but the layering effect proposed would be part of an evolving townscape, with a scale and calm architectural language which officers consider would be appropriate in this location.

213. The masterplan breaks down into three linear plots or development zones; the western block which includes Aylesham Gardens, the workspace building, the Rye Lane frontage and blocks D, E and F; a central block with both individual and a smaller podium block with food and drink and retail uses facing the Floral Walk and Aylesham Gardens (blocks G, H, J & K); and the eastern podium block, with taller buildings around the edges and the supermarket in the base (blocks L, M, N, P and Q). This simple layout would be permeable and would create routes and connections through the site, with a hierarchy of spaces and character areas informed by existing spaces in the Peckham area.

The Rye Lane frontage (blocks A, B and C), blocks D, E and F, and Aylesham Gardens

214. Blocks A, B and C would sit within the Rye Lane Peckham Conservation Area. It is considered that the design of this block has been successfully articulated

as a vertical framework with tall ground floor shopfronts facing the street, and a coherent style taking its cues from the historic shopfronts found in the Jones and Higgins department store which formerly occupied the site. The locations of the routes through this frontage, comprising a smaller, more intimate alley to the north and a large, double height cut through to the south, are welcomed; successful elements of these include glazing lining the passageways, presenting opportunities for activity and overlooking. The overall height of this block – set at seven-storeys, rising sheer on the Rye Lane frontage with a limited set-back, is however, of significant concern.

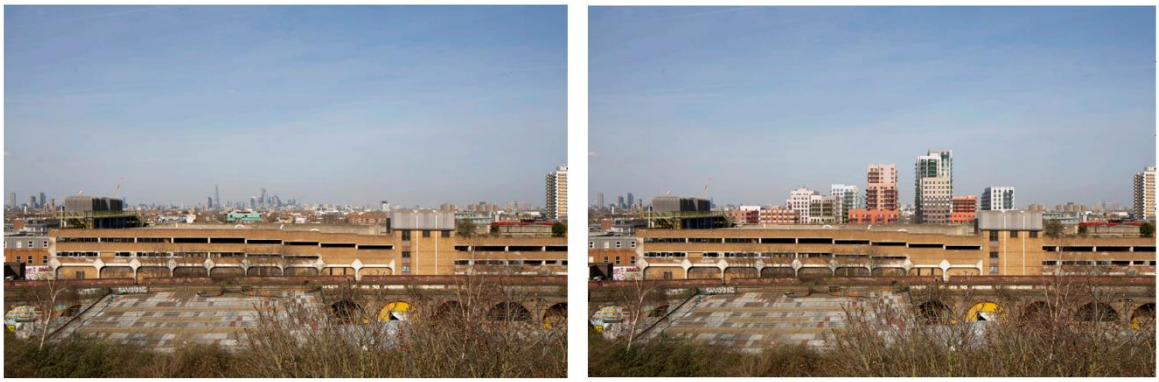
215. The Heritage, Townscape and Visual Impact Assessment (HTVIA) submitted with the application includes local views 9 (Rye Lane / Highshore Road), 32 and 33 (from the roof of the Bussey Building, east and west). These views illustrate the concerns raised regarding the height, massing and alignment of blocks A, B and C, which would have a direct and enduring impact on the significance of the conservation area. View 9 is a strong linear view of the Rye Lane Peckham Conservation Area taking in both the bank building at 47-49 Rye Lane and the historic landmark of the Jones and Higgins clocktower. The views demonstrate that blocks A, B and C would obstruct views of the clock tower and show how dominant the upper-most floors would appear in what is essentially a 3-5 storey historic townscape.

<u>Existing and proposed views from Rye Lane / Highshore Road (view 9)</u>



216. Views 32 and 33 are not protected views, but are nonetheless characterful views of Peckham with the World City in the backdrop. From this elevated location there are clear views of St Paul's Cathedral. The views demonstrate that the upper-most floor of blocks A, B and C would block views of this landmark from the viewer. The harm arising as a consequence of blocks A, B and C to the character and appearance of this part of the conservation area is considered to be medium to high 'Less than Substantial' harm as defined by paragraph 208 of the NPPF.

Existing and proposed view 32 (Bussey Building west)



217. In light of the above there are concerns in urban design terms regarding the massing and design of this large and prominent frontage block within the conservation area. The conservation area is dotted with characterful rooflines and gables, and a reduced scale and massing, a more sculptural element to the roofline as well as a more subtle vertical articulation reflecting the plot widths and grain of the conservation area is called for here, and the proposed development would not deliver this.

218. The distribution of massing of this area of the masterplan would generally be lower and quieter in character than the east of the site, and, with the exception of blocks A, B and C, would respond well to the townscape and conservation area. Whilst the architectural details of block D with its arched windows at ground floor would be acceptable, the south elevation would benefit more articulation, although this has been deliberately designed to avoid any impact upon the amenity of the residents in blocks A and E. Block E would appear more complete in its form and architecture, with retail space facing Aylesham Gardens and a double height plinth with projecting double bay which would create a successful, handsome appearance to the building. Raising the height of the ground floor frontage to block F would help it to better integrate into the townscape of Hanover Park, however, the issues identified with these blocks are not considered to be so significant that officers would have recommended a reason for refusal on this basis.

The central block (buildings G, H, J and K)

219. This central block would contain both individual and a smaller podium blocks with food and drink and retail uses facing the Floral Walk and Aylesham Gardens. The blocks would include retail and residential, providing active frontages along the public realm, and residential uses along the southern edge facing Hanover Park. The height and massing of the buildings in this part of the masterplan is generally considered to be successful.

The “podium block” (buildings L, M, N, P and Q)

220. In general, the distribution of scale and massing across the site would be acceptable. There are concerns however, regarding the articulation of the massing of block L, particularly the height and massing of the east/west section of block L which would face the bus station. In this location whilst the layered arrangement and highly articulated silhouettes of blocks K G and D would appear complement the historic townscape in various views, block L would appear monolithic and unrelenting. Block L would not benefit from a historic foreground and, in the views from the east approach along Queens Road, would rise cliff-like in the townscape and would fail to respond to its context successfully. It would tower over its setting, dwarfing the nearby Purdon House and rising in an unrelenting manner over the bus station.

221. Bock L would also be prominent in the view from Peckham Square (view 17) and more obviously in view 37 from Queens Road. As a consequence this building would introduce a mid-level of Less than Substantial Harm to the Rye Lane Peckham Conservation Area when viewed from Peckham Hill Street. In light of this the proposal would not comply with policies P13 of the Southwark Plan 'Design of places' because its height, scale, massing and arrangement would not respond positively to the existing townscape, character and context.

Existing and proposed view from Peckham Square (view 17)





Existing and proposed view of bus station from Peckham High Street (view 37)





222. A reduction in the height of block L was requested at pre-application stage in order to bring the building closer to the height and massing of the nearby

Purdon House, leaving a tower on the corner, but this change was not made. This amendment would have aligned block L more closely with the approach to massing of block K nearby, and introduce a greater articulation into this prominent edge of the masterplan. Officers consider that the reduction in height is also required to reduce the harsh impact that the scale of the building would have on the experience of the bus station, to soften this important outer edge of the development.

223. Block M, the tallest tower, has been developed to achieve a more slender profile; this has been done by the inclusion of a crown top and a re-distribution of some balconies to the facades. The tower would present its slender profile towards the north and south, and its location in the masterplan would help to mask its more prominent flanks from the immediate townscape. The combination of taller elements in blocks N and P and the shorter areas of block Q and above the service yard entrance would translate to an acceptable juxtaposition of the massing, and easily identifiable features of the street. It is considered that the height of block Q would relate well to the outer edges of the site and would book end Hanover Park appropriately.

224. It is considered that the view along Hanover Park would be successfully articulated, with a general shoulder height of around six-storeys onto the street frontages of blocks F, H, J and N, with the taller elements behind. Generally the architecture on this southern edge of the masterplan would be a combination of brick and tile-led mansion block style, with detailing around the base, shopfront fronts, fenestration and balconies. There would be some stand out buildings in this part of the site which would reflect the lively character of Peckham, such as the pink and green elements of block N and the wash of colour of block Q.

225. Officers have assessed the application in light of policies D9 of the London Plan and P17 of the Southwark Plan which relate to tall buildings. These policies set out a number of criteria which proposals for tall buildings must comply with. In the main the proposed development is considered to comply with these policies, and of note is that the site allocation specifically states that development of up to 20-storeys could be appropriate in this location. As set out earlier in the report the tallest buildings would be located on the eastern side of the site so that the protected borough view would be preserved.

Ground floor experience

226. Generally, the ground floor experience throughout the site is welcome, with entrances to new homes, food and drink and retail units facing the street and the principal routes, especially Floral Walk and around Aylesham Gardens, in commercial use with a wayfinding emphasis towards the proposed supermarket entrance on the east of the site. The extension of the architectural facades of the podium blocks to the ground is also welcome, grounding them properly in the streetscape. Officers consider that further work is required regarding the ground floor experience of blocks D, K and L, especially in relation to Peckham Yards and the bus station in order to reinforce these aspects of the street

experience; this could however, be addressed by way of a condition in the event that planning permission is granted on appeal. There are concerns regarding the ground floor experience of blocks Q and P facing McKerrell Road which lacks architectural flair, particularly block Q which would be harshly against the back edge of the pavement. Overall however, it is not considered that these issues are so significant as to warrant the refusal of planning permission.

Conclusion

227. The overall masterplan for the development would generally conform with the urban design principles of site allocation NSP74; there would be a good level of permeability and legibility, and in general the massing would be appropriately distributed across the centre of the site. There would be clear areas of activity and a variety of spaces which would complement the existing townscape of Peckham and add vibrancy and interest to a complex and mature existing townscape.

228. However, owing to the excessive height of blocks A, B and C on the Rye Lane it is considered that the proposal would fail to accord with paragraphs 212, 213 and 214 of the NPPF (2024), policies D1'Design, character and capacity for growth' and HC1 'Heritage conservation and growth' of the London Plan 2021, and policies P13 'Design of places', P20 'Conservation areas', P21 'Conservation of the historic environment and natural heritage' and site allocation NSP74 of the Southwark Plan 2022, and the Rye Lane Peckham Conservation Area Appraisal (October 2011).

229. Amendments have been sought during the course of pre-application discussions and the application in order to address these concerns, but these have not been forthcoming. The council's design policies respond to the principle in the NPPF of the presumption in favour of sustainable development and require development, especially in urban setting such as this, to adjust in scale, massing and arrangement to better knit into the established and historic townscape, and officers consider that the proposed development would fail to do this in these two locations.

Impact upon heritage assets

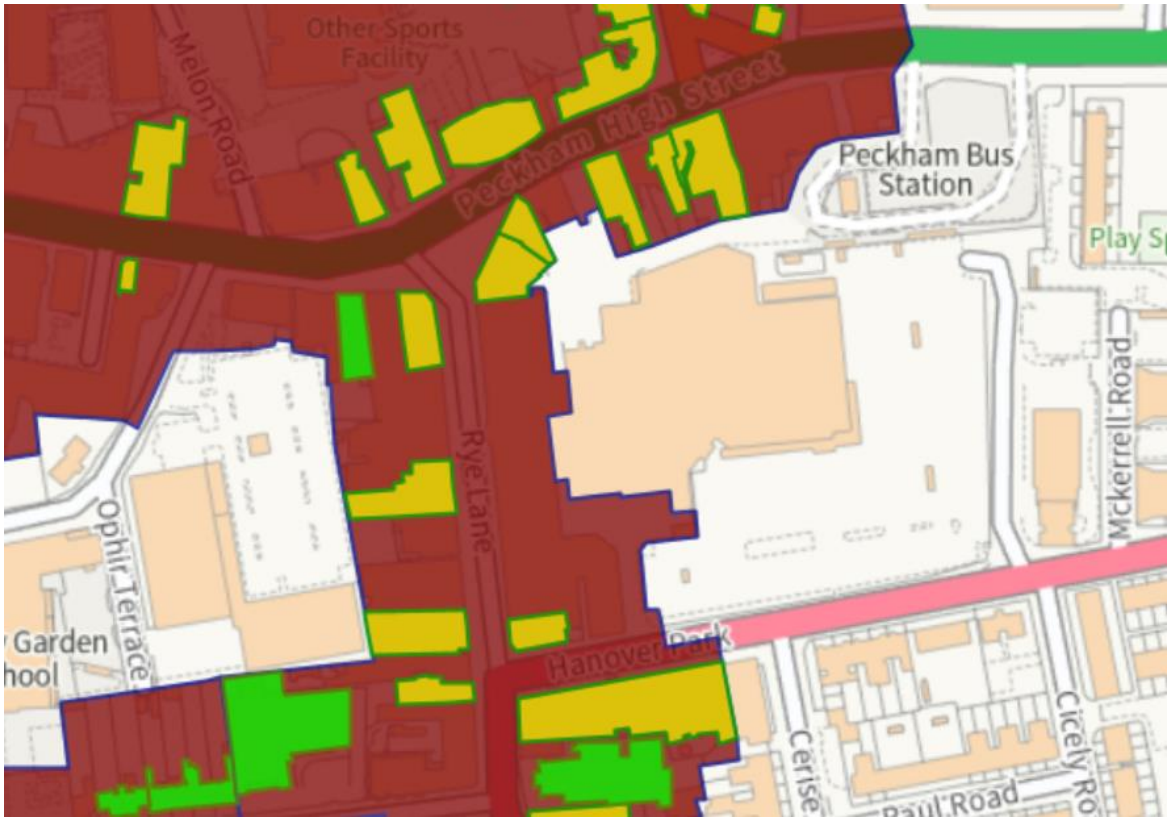
230. The legislation governing listed buildings and conservation areas is the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act'). Section 66 (2) of the Act requires decision makers with respect to any listed building or their setting to have special regard to the desirability of preserving the building or any features of special architectural or historic interest which it possesses. Section 72(1) of the Act requires decision makers with respect to any buildings or other land in a conservation area to pay 'special attention… to the desirability of preserving or enhancing the character or appearance of that area'.

231. With regard to the NPPF (2024), the paragraphs in chapter 16 'Conserving and enhancing the historic environment' are of material consideration. In particular, paragraph 212 requires "great weight" to be given to a heritage asset's conservation irrespective of any harm. Paragraph 213 requires that any harm or loss should require clear and convincing justification, and paragraph 214 advises that "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."

232. There are a number of policies in both the London Plan and the Southwark Plan which seek to protect heritage assets, including their settings. In the London Plan this includes policy HC1 'Heritage conservation and growth' and in the Southwark Plan the relevant policies include P13(2) 'Design of places' P19 'Listed buildings and structures', P20 'Conservation areas' and P26 'Local list'; further guidance is set out in the council's adopted Heritage SPD.

233. Many of the objections received from residents and local groups raise concerns regarding the impact of the proposed development on townscape, visual amenity and heritage assets, and that the proposal would be out of keeping with the area. Historic England considers that the overall height and distribution of tall buildings would have in an incongruous relationship with the more modest-scale and fine grain townscape along Rye Lane and Peckham High Street, from some locations appearing as an enormous wall of development in the background of key views of the Rye Lane Peckham Conservation Area. Historic England considers that these impacts would cause harm to the conservation area's character.

Heritage assets near to the site



Brown = conservation areas
Green = listed buildings
Yellow = locally listed buildings

234. As set out earlier in the report, the HTVIA submitted with the application considers the impacts upon heritage assets. Officers have reviewed this and the advice from LUC and are satisfied that the approach to the assessment is acceptable. However, for the reasons set out below it is considered that the proposal would fail to preserve or enhance the character and appearance of the Rye Lane Peckham Conservation Area.

Demolition of the existing buildings

235. Around one third of the Aylesham centre sits within the Rye Lane Peckham Conservation Area. This is mainly the western part of the shopping centre and includes the full length of the shopping centre's Rye Lane frontage, and it pre-dates the conservation area designation. It was incorporated into the conservation area not because of its historic significance, but because of the significance of the historic townscape which surrounds it; it is flanked by two of the most significant buildings in the conservation area, the Jones and Higgins building to the north and the former HSBC buildings to the south. Beyond this and across the street Nos 1-5 and 6—30 (even) Rye Lane make up the most cohesive and well-preserved historic frontage in the conservation area. The

adopted Conservation Area Appraisal notes this, and recognises the Aylesham Centre frontage as a negative contributor to the conservation area.

236. Notwithstanding this, the existing frontage, owing to its height, is not particularly harmful because it is not visually dominant and it retains key views within the conservation area, including of the Jones and Higgins building and its distinctive clock tower. As such, and in accordance with the NPPF, the demolition of the existing building is considered to be acceptable. However, if planning permission is granted on appeal officers would recommend a condition preventing its demolition until / unless a contract for erecting a new building in its place has been submitted for approval, to ensure that there would be no harmful 'gap' in the frontage for an excessive amount of time.

Rye Lane Peckham Conservation Area

237. Blocks A, B and C have been designed to follow the street alignment of the existing historic 'bookends' of this important conservation area frontage, these being the Jones and Higgins building to the north and the former bank building to the south. Whilst the design of these blocks reflects a degree of articulation arising from the collaboration of three architects commissioned to design this part of the masterplan, they would however, tower over its historic bookends. Moreover, rising to seven-storeys in height the three blocks would seem to merge into a singular building, punctuated by two routes which would provide access to the remainder of the site beyond.

238. A strong shopfront presence and vertical emphasis within a wider framework would be successful at grade, but it is considered that the transition between the immediately adjacent historic landmarks would be uncomfortable. In its singular form these blocks would introduce a medium to high level of Less than Substantial Harm to the character and appearance of the Rye Lane Peckham conservation area. In taking up such a prominent frontage in the conservation area the sheer scale and massing, coupled with the lack of substantial set-back at the upper levels would introduce an incongruous and overly dominant incursion into this well-established and sensitive historic context.

239. In longer views of the site from the south, blocks A B and C would be prominently visible in the townscape, anchoring the middle of the street adjacent to the Jones and Higgins building; the taller elements of the development (blocks L, M, N, P and Q) would be visible in longer views from the south, but in the background, providing point blocks in the distance. From the junction of Rye Lane and Hanover Park, the buildings' mass would step down, providing a successful streetscene of buildings with active frontages on the ground floor.

240. The buildings would be visible in the context of the locally listed former bank building and would affect its setting. However, its setting has changed throughout its history, and it would remain a prominent decorated corner building within an historic high street context.

Jones and Higgins (locally listed)

241. This important local landmark of townscape value sits pride of place at the junction of Rye Lane with Peckham High Street. Whilst it has been altered historically, it still has architectural detail and a cultural impact upon the locality and is a positive reminder of the area's town centre prosperity. The taller buildings in the site have been clustered away from the "head and shoulders" of the clock tower, and in views from Peckham Road, the top of the clocktower outline would remain free from clutter behind when viewed in the more important views along Peckham High Street from the west.

Proposed view of the Jones and Higgins building looking east from Peckham High Street (view 12 – block M in the background)



242. The taller buildings would come into view in some townscape views, but there would be many other uncluttered views available within the street, mostly from the southern side of Peckham High Street. In closer experiences of the Jones and Higgins building the development would be visible as a new piece of townscape, replacing the out of character and dated Aylesham Centre façade on Rye Lane. A prominent southern flank of the Jones and Higgins building would be exposed by the development, therefore if planning permission is granted on appeal officers would seek to secure a condition for a scheme of works to make-good the exposed flank.

243. In many respects it has become apparent during the course of pre-app discussions how important it has been for the design to be shaped around these views of the Jones and Higgins building. Nonetheless is it considered that

there is some impact on the locally listed Jones and Higgins building arising especially due the discordant scale and massing the new Rye Lane frontage block (Blocks A, B and C) accentuated by the proximity of this block to this undesignated heritage asset. The impact is considered to give rise to a mid-level of Less than Substantial harm to its setting, arising due to the excessive scale of the this block potentially diminishing the Jones and Higgins contribution to the Rye Lane Peckham Conservation Area.

Proposed view 6 from Peckham High Street



Shards Terrace (locally listed)

244. At the junction of Rye Lane and Peckham High Street there are a collection of locally listed buildings which contribute to the historic and contemporary townscape of Peckham. These are a mix of terraces (Shards Terrace – locally listed - 12 strong curved terrace facing the street of three stories with commercial shop front on the ground floor), the two pubs or former pubs at 109 and 119 Peckham High Street, and 86-88 Peckham High Street, a handsome red brick 3.5-storey building with traditional shopfront at ground floor. These buildings are positive contributors to the conservation area and good examples of locally significant high street architecture and character. The setting of Shards Terrace buildings would be impacted by the proposed development as the taller elements would be visible within their context. However, it is considered that this impact would not harm its significance as Victorian town centre terrace and it would remain a positive contributor to the conservation area.

98-104 Peckham High Street (local list)

245. The taller buildings within the proposed development would be visible in the background context of the buildings to the south side of Peckham High Street. Townscape layering can have wide impacts on well-established street patterns and scale, and the applicant team has worked positively with officers to achieve a suitable size of buildings (blocks D and K) which would sit to the rear of 98-104 Peckham High Street. The architectural language of these blocks is considered to be acceptable, with a warehouse aesthetic to block D, a point block to the corner of block K in an art-deco style, and a simpler warehouse style adjacent. The scale and architectural development of these blocks would not cause significant harm to the conservation area and locally listed buildings of 98-104 High Street. These buildings would also create a group of buildings facing north fronting onto Peckham Yards, which would improve the immediate setting at the rear of this group of buildings.

Baptist Chapel – grade II

246. Rye Lane Baptist chapel is a grade II listed Victorian chapel, with stucco front and pilasters imposing onto the street. It is a recognisable anomaly in the wider townscape of Rye Lane due to its set back from the pavement, community and religious use, form and materials. This building greatly contributes to the townscape and is a well-known building in Peckham. It setting is the immediately adjacent Victorian and Georgian townscape, with residential to the rear, and the setting contributes to the significance of the building through this clear historic link.

247. The taller elements of the proposed development and blocks A,B and C would be visible within the same context as the chapel, but they would be visible within a wider townscape and would not impinge upon views or the experience of the chapel from Rye Lane or from the rear. It is therefore considered that the proposals would preserve the significance of this grade II listed building.

58 Peckham High Street – grade II

248. This 18th century house is nestled in the middle of a terrace and the upper storeys are glimpsed over a Victorian shop build-out and modern shopfront. Its primary significance lies in its materiality, and it has lost its original neighbours. It contributes positively to the conservation area by adding to the tapestry of ages and designs of the surrounding buildings. The proposed development would be visible within the setting of the building, but it is considered that they would preserve its significance.

Peckham Hill Street Conservation Area

249. The significance of Peckham Hill Street Conservation Area is as a good example of speculative suburban development in the early 19th century, of terraces and villas fronting a principle street, largely built in London stock brick to 3-4 storeys.

The former Peckham branch of the Surrey Canal ran to the western side of the street, and the north/south linear street frames the view of the site from the north. The taller elements of the proposed development would be visible in longer views, but would primarily impact the Rye Lane Peckham Conservation Area rather than the suburban significance of Peckham Hill Street Conservation Area. Officers consider that this significance would be preserved.

Holly Grove Conservation Area

250. Holly Grove Conservation Area is situated to the west of Peckham town centre, to the south of Peckham Road. A railway line runs east-west through the conservation area with Rye Lane forming a boundary to the east. The Holly Grove Conservation Area is essentially a 19th century planned suburban development with a strong landscape element, which contrasts with its immediate surroundings of the town centre and former industrial areas associated with the canal and railway.

251. The taller elements of the proposed development would be visible in glimpses from Highshore Road, Holy Grove and Lyndhurst Way, but other elements of the townscape are also visible in these views including the school buildings of the Harris Academy in Lyndhurst Way, and the rear elevations and roof tops of buildings on Rye Lane when viewed from Highshore Road and Holly Grove. The proposed buildings would be far enough away as to not impact the Holly Grove Conservation Area in a negative manner, as overall the suburban townscape would be preserved.

Conclusion on heritage impacts

252. The adopted Rye Lane Peckham Conservation Area Appraisal recognises the contribution of the Rye Lane and Peckham High Street frontages to the significance and the setting of the conservation area. It also anticipates future development at the rears and, given the limited potential for visibility afforded by the urban morphology of the area, includes guidance for that development and advises that to the rear development could rise to up to eight-storeys in height and that development on the frontage should remain within the prevalent historic heights of around four to five-storeys.

253. In the main a large part of the central masterplan would generally conform with this guidance and that within site allocation NSP74. However, there would be a high level of Less than Substantial Harm as outlined above relating to the Rye Lane frontage (blocks A, B and C). This part of the site sits within the Rye Lane Peckham Conservation Area and as such has an important job to do in completing this highly significant street frontage. The monolithic design, sheer seven-storey scale and massing of these linear blocks would be the main cause of that harm. They would be highly visible along the entire Rye Lane frontage, as well as the approaches along Peckham High Street and Peckham Square, affecting views both within the conservation area as well as views into and out of

the conservation area and adjacent conservation areas.

254. In these cases decision-making bodies are required to give great weight to the harm identified and to take steps to avoid that harm. The NPPF and legislation requires that decision-makers consider the desirability to conserve or enhance the character and appearance of heritage assets and their settings. Paragraph 213 of the NPPF (Dec 2024) states that "*Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification*."

255. Having recognised the level of harm arising – in this case the scale and design of the Rye Lane frontage blocks A , B and C – paragraph 215 of the NPPF requires decision-makers to consider the level of harm in the balance against the public benefits of the proposal, including securing its optimum viable use. In this case the harm would be localised and focused on this key frontage of the conservation area. The public benefits which can be considered in the balance include the new public realm which would be available to the people in the area, the new retail uses, workspace and housing, as well as any heritage benefits. The provision of affordable housing is a key consideration, and this is considered in detail later in the report. The assessment of whether there is sufficient public to outweigh the heritage harm is set out in the conclusion and planning assessment section below.

256. In this case a question remains about how the harm could have been avoided simply by lowering the height of the blocks on Rye Lane and instead drawing on the fine grain and architectural dexterity of the conservation area and still deliver a successful development on what is essentially an open-air car park in a key town centre. As it stands, it is considered that the design, scale, massing and arrangement of blocks A, B and C would fail to comply with chapter 16 of the NPPF, as they would fail to preserve or enhance the character and appearance of the conservation area, or to enhance the heritage asset and its setting with an innovative and creative contextual architectural response as required by policy HC1 of the London Plan (2021). Whilst the delivery of 35% affordable housing may have been sufficient to outweigh this heritage harm on the basis of the public benefits, this is not considered to be the case for the 12% affordable housing now proposed. It is therefore concluded that the proposal would fail to conserve or enhance the character and appearance of the Rye Lane Peckham Conservation Area, contrary to a number of policies in the London Plan and Southwark Plan, together with paragraphs 212-214 of the NPPF and the Rye Lane Peckham Conservation Area Appraisal.

Design Review Panel (DRP)

257. The development was reviewed by the Southwark DRP in March 2024 whilst still in the pre-application stage. The Panel commented on the masterplan and the individual buildings, taking time to discuss each block with the individual designers. In respect of the masterplan overall, they made a number of observations and found some of the spaces unconvincing, requiring further finessing. However, the panel's main concern focused on the McKerrell Road

and Hanover Park frontages and the north east edge of the site next to the bus station, where they found the design to be disappointing and poor quality.

258. In respect of the individual buildings the Panel were most critical of the Rye Lane frontage (blocks A, B and C). Whilst they welcomed the involvement three architects, the panel felt that the building lacked clarity and definition and also failed to respond to its historic setting. The panel advised that this building should be revised, perhaps broken down into six parts rather than three. The panel did not endorse the seven-storey height and challenged the designers to respond more closely to the modest scale and design of the historic buildings on Rye Lane.

259. In conclusion the panel generally welcomed the arrangement of blocks and spaces across the masterplan and found the armature of movement, access to and servicing of the site to be intuitive and natural. They recognised the early stage of design development and required further design development of the architecture of all the buildings.

260. In response to the panel the architectural design of all the blocks was refined further, although not substantially altered. No adjustment was made to the height or massing of any of the blocks, and blocks A, B and C remained at a maximum of seven-storeys in height. The massing and height was generally retained, and block L and remains largely unchanged.

Trees and landscaping

261. Policy G7 of the London Plan ‘Trees and woodlands’ states that development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees, there should be adequate replacement based on the existing value of the benefits of the trees removed. Policy P61 of the Southwark Plan ‘Trees’ states that development must retain and protect significant existing trees and must retain and enhance the borough’s trees and canopy cover.

262. An arboricultural survey impact assessment and method statement report has been submitted with the application. This confirms that seven silver maple trees and two claret ash trees on the site have been felled in recent years (9 in total), with just their stumps left in-situ.

263. Applications 25/AP/1085 and 25/AP/1086 were granted in May this year to carry out works to protected trees along Hanover park, including the removal of one tree and pollarding of others. The removal of the tree and the pollarding have taken place.

Trees

264. The following image shows the location of 46 existing trees on the site which are covered by a Tree Preservation Order (TPO), including those which would be felled and those which would be retained:



Existing tree without TPO to be retained

Existing tree with TPO to be retained

Existing tree without TPO to be removed

Existing tree with TPO to removed

Existing tree felled due to recent storm

X Building Name

Photograph of some of the existing trees on the site, near to McKerrell Road



265. The following table highlights the existing trees on the site which are to be retained and those to be felled. This includes those covered by a Tree Preservation Order (TPO) and Non TPO trees.

266.

	Trees to be retained			Trees to be removed		
	TPO	Non-TPO	Total	TPO	Non-TPO	Total
Category B	0	2	2	0	6	6
Category C	6	1	7	9	13	22
Category U	0	0	0	2	0	2
Felled trees	0	0	0	7	0	7
Totals	6	3	9	18	19	37

267. The different categories referenced above relate to the quality and retention value of the tree. Category B are moderate quality, Category C are low quality and Category U are unsuitable for retention.

268. As referenced above, the existing trees on the site would fall within Category B, C and U. There are no category A trees on the site. It is noted that there are trees with preservation orders that are intended to be removed/ felled and although these are not category A trees, they are considered important. These would however be replaced and there would be a significant increase in planting.

269. For instance, there would be an increase from 46 trees to 168 trees on the site. This is an increase of 122 trees being planted on the site and this change would also offer the opportunity to replace the predominantly low-quality tree population with site-appropriate, climate-resilient species. The loss of the TPO trees could therefore be accepted.

270. It is noted that the existing trees to Hanover Park would largely be retained as they provide an important buffer to the road and to the residential area to the south. Their retention could be controlled through a planning condition were the application recommended for approval.

271. The proposed development would result in a minor encroachment into root protection zones, but like with the pruning, this could be controlled through a condition if planning permission is granted on appeal.

Landscaping

272. Policy G1 of the London Plan ‘Green infrastructure’ states that development proposals should incorporate appropriate elements of green infrastructure that are integrated into London’s wider green infrastructure network. Green infrastructure is defined in the plan as comprising the network of parks, rivers, water spaces and green spaces, plus the green elements of the built environment such as street trees, green roofs and sustainable drainage systems. Policy G4 of the London Plan ‘open space’ states that development proposals should, where possible, create areas of publicly accessible open space, particularly in areas of deficiency.

273. At present, the majority of the site is either buildings or hardstanding, but there are a number of trees along Hanover Park as well as at sporadic locations within the car park. There is also a cluster of trees to the northern boundary, some of which would be removed.

Photograph of existing mature trees on the north-eastern part of the site



274. This development would significantly alter the current situation with regard to the layout and siting of buildings, as well as the removal of the car park. The proposed changes with regard to the landscaping of the ground floor of the site are shown on the image below. This shows the proposed grassed and play area of Aylesham Gardens (1), the 'Discovery Garden' located between blocks H and 'greenery' between blocks D and E.

Proposed ground level landscaping



- Site boundary
- X Building number
- 1 Aylesham Gardens
- 2 Green Link
- 3 Floral Walk
- 4 Peckham Yards
- 5 Discovery Garden
- 6 Supermarket entrance
- 7 Indicative bus station improvements
- 8 Retained existing trees
- 9 Hanover Park
- 10 Connection to Rye Lane
- 11 Mckerrell Road

Proposed landscaping at upper floor levels



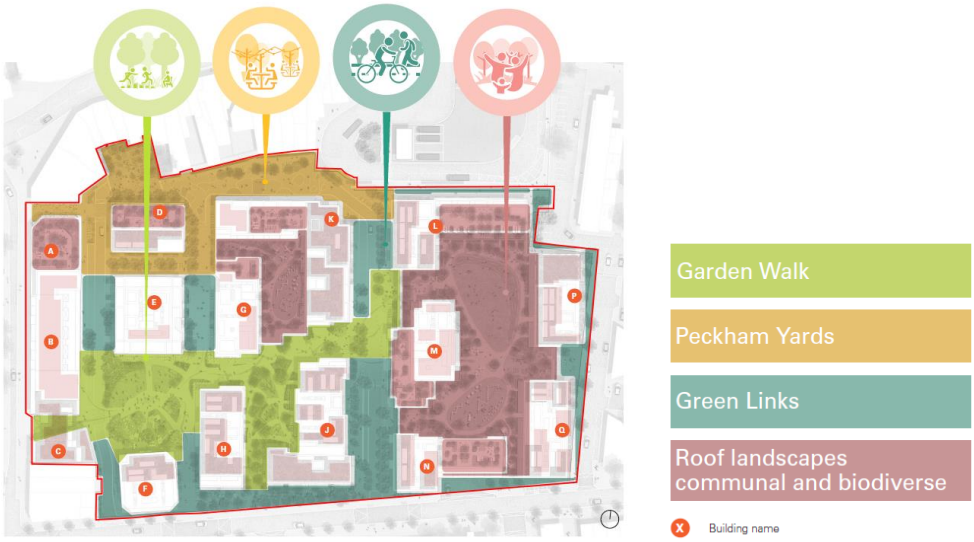
275. The ground level landscaping would comprise different character areas across the site, including an urban orchard (located in Peckham Yards, to the north of the site) and woodland planting between blocks H and J. There would also be biodiverse wildflower meadow planting at roof level.

Open space

276. As referenced elsewhere in the report and shown on the image below, the scheme would include large areas of open space and this would be create four character areas. These would be:

- Garden Walk
- Green Links
- Peckham Yards
- Roof landscape

Proposed landscape character areas



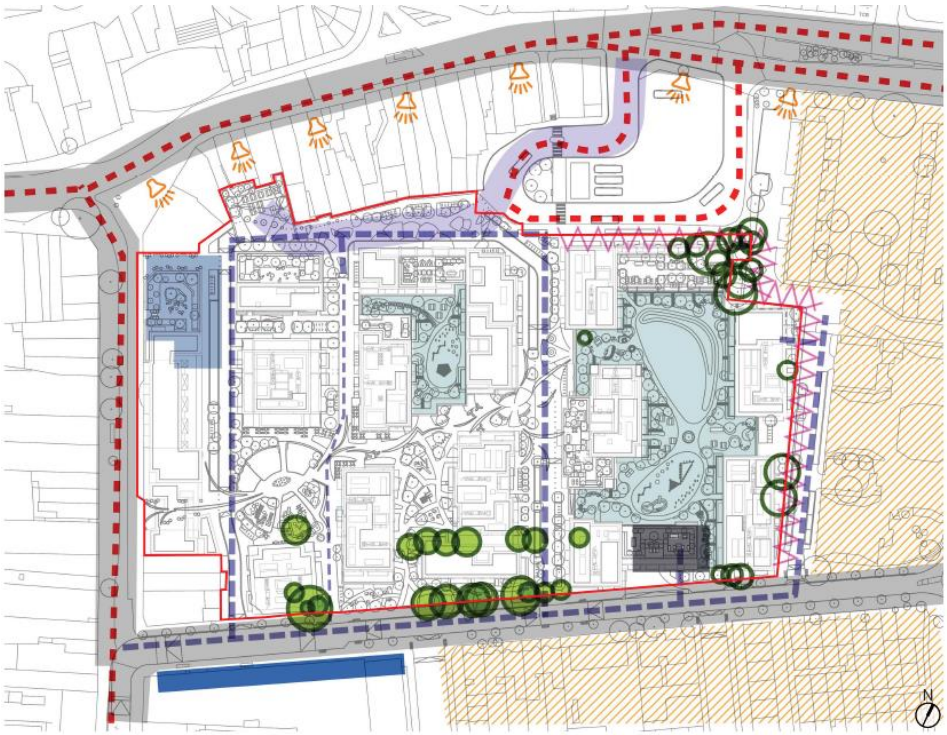
Concerns have been raised following public consultation on the application that the site is located in an open space deficiency area, and that additional open space should be provided in line with other London councils which require more open space than that which is proposed on the site.

277. The proposed development would provide 1.02 hectares (ha) (10,240sqm) of new publicly accessible space, which would contribute towards the 11 hectares required by policy ST1 of the Southwark Plan. The proposal must be considered against the relevant policies in the London Plan and the Southwark Plan. In this instance site allocation NSP74 does not provide a specific amount of public realm or open space which the development must provide, and officers consider that sufficient open space would be provided, commensurate with the scale of the development and the different uses it would accommodate.

278. Members of the public have also made reference to the Southwark Open Space Strategy (2013) which provides recommendations on issues such as the protection of open space, biodiversity and the provision of green space. These are all however, covered by newer Southwark Plan policies and have been considered in the relevant sections of this report.

279. When considering the quality and usability of the new open space, it is noted that there would be servicing routes across some of it as shown on the image below; the dotted line shows the proposed servicing routes and the red line to the north shows the bus station.

Proposed servicing routes



280. These vehicular routes would have some impact on the use of the proposed footpaths, but vehicles would not be able to enter the public/ amenity spaces. The vehicles delivery, servicing and refuse collection vehicles, and as set out later in the report in relation to transport impacts, the number of vehicles would not be significantly high and would predominantly be managed through a booking system. Overall it is considered that the public/ amenity spaces would still be good and usable spaces for the local community.

281. Letters of objection have raised concerns that the proposed development would not include a community garden, and that this would be of benefit to the local area. As mentioned above, the development plan and site allocation does not require this and the proposal would provide large areas of communal space which could be readily enjoyed by the public. The maintenance and upkeep of these communal spaces would need to be secured as a planning obligation in the event that planning permission is granted on appeal, together with public access provisions through the site.

Proposed view along Hanover Park looking east (potential pedestrian crossing for illustrative purposes)



Proposed route from Rye Lane into the site



Proposed view of the entrance to the proposed supermarket



Lighting

282. The proposed development would incorporate a number of different styles and types of lighting. Lighting of the proposed pedestrian routes would be via a combination of pole mounted fittings, path bollards, and building mounted light fittings. This would help to ensure that areas are visible, and assist in providing a safe and secure environment. Letters of objection have raised light pollution as a concern, although this could be dealt with by way of a condition.

Conclusion on trees and landscaping

283. As referenced above, the proposed works would remove a number of trees covered by a preservation order but in total, there would be a significant increase in the number of trees on the site, from 46 to 168 (an increase of 122). It is noted that the felled trees could be more mature than the new/ replacement trees but when coupled with the changes in landscaping, there could be an overall improvement to the site. These measures could be secured through conditions and planning obligations, together with obligations for a public realm and landscape management strategy and securing public access through the site. With these in place it is considered that the proposed development would be acceptable in terms of trees and landscaping.

Ecology and biodiversity net gain

Biodiversity Net Gain (BNG)

284. Policy G6 of the London Plan ‘Biodiversity and access to nature’ requires development proposals to manage impacts on biodiversity and aim to secure net 72 biodiversity gain. Policy P60 of the Southwark Plan ‘Biodiversity’ requires development to contribute to net gains in biodiversity, including features such as green and brown roofs, green walls and soft landscaping.

285. 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.

286. 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.

287. The Biodiversity Gain hierarchy sets out a list of priority actions:

- first, in relation to onsite habitats which have a medium, high and very high distinctiveness, the avoidance of adverse effects from the development and, if they cannot be avoided, the mitigation of those effects; and
- then, in relation to all onsite habitats which are adversely affected by the development, the effect should be compensated by prioritizing the enhancement of existing onsite habitats, creation of new onsite habitats, allocation of registered offsite gains and finally the purchase of biodiversity credits.

288. <u>On site BNG</u>

The draft Biodiversity Report and follow up information submitted by the applicant state that the mandatory 10% BNG can be achieved on-site. It would achieve an increase of 89.91% which would be in accordance with the Biodiversity Hierarchy.

289. 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.

290. Non-significant enhancements are habitat enhancements whose loss will not significantly decrease the development's biodiversity value

291. Government guidance (PPG Biodiversity, 2024) on determining whether BNG to be delivered on a development site is 'significant' sets out five factors. These are set out below and the following assessment has been undertaken by the council's ecologist to determine whether the development is significant or non-significant.

Government Guidance on Significance; **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: 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 other green roof is proposed to deliver 0.54 and 0.38 units. Ground level planters are proposed to deliver 0.44 units.
Habitat creation or enhancement where distinctiveness is increased relative to the distinctiveness of the habitat before development.	
Areas of habitat creation or enhancement which are significant in area relative to the size of the development .	A parcel of Urban trees are proposed to deliver 0.6026 ha.
Enhancements to habitat condition e.g. from poor or moderate to good.	N/A

292. The BNG to be provided as part of this development is significant as set out in the above table. A planning obligation would be required to secure the biodiversity gain for 30 years, together with a monitoring fee to cover the cost of periodic monitoring over 30 years. A Biodiversity Net Gain Plan and Habitat and Management and Monitoring Plan would also be required in the event that planning permission is granted on appeal.

293. For the avoidance of doubt, the submitted Ecological Assessment did not identify any European or National statutory designated sites within the relevant zone of influence. There is however, one Local Nature Reserve (LNR) and nine Sites of Importance for Nature Conservation (SINCs) within the respective zone of influence. Nunhead Cemetery LNR is located approximately 1.5 km to the north-east of the site, whilst the closest SINC would be the Surrey Canal Walk located approximately 125 m to the north of the site and separated from it by several roads and urban development. Given the distance between the proposed development and the identified designated sites, it is considered that there would

be no adverse impacts to these ecological areas The scheme is therefore be in compliance with policies G6 of the London Plan and P60 of the Southwark Plan.

Urban Greening

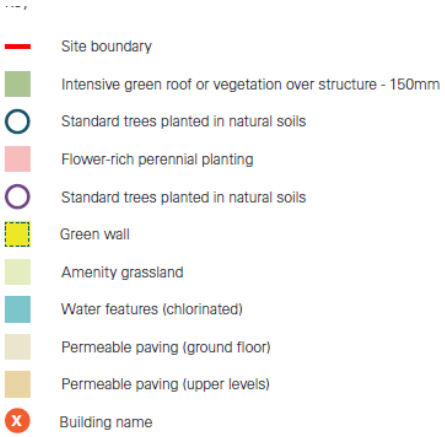
294. Policy G6 of the London Plan references biodiversity and access to nature whilst Policy G5 (Urban greening) of the London Plan 2021 encourages major developments to contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. The policy also recommends a target score of 0.4 for residential developments and 0.3 for predominantly commercial properties.

295. The majority of the development would be residential so the development would need to comply with the 0.4 figure.

296. The application proposes an urban greening factor (UGF) of 0.38 which is under the 0.4 requirement, and this has been raised in some of the objections to the planning application. The supporting information has however stated that the proposed development has sought to maximise urban greening through measures such as perennial planting throughout the public realm, green walls and green roofs as shown on the image below:

297.





298. As shown on this image, there are constraints on the site such as the provision of servicing routes, pedestrian routes and playspace which reduce the potential for urban greening. The 0.38 score and the non-compliance with the London Plan is therefore noted, but given the extent of public realm and how hard it would have to work in terms of supporting the variety of proposed uses and high levels of footfall, officers consider that the proposed UGF score would be acceptable.

Affordable housing

299. When the planning application was first submitted 35% affordable housing by habitable room was proposed, which equated to 270 affordable homes (185 social-rented and 85 intermediate). This level of affordable housing was proposed even though the applicant's Financial Viability Assessment (FVA) showed that it was not financially viable, and this was confirmed by BPS which is acting as the council's independent viability advisor for the application. In December 2024 the applicant reduced the affordable housing offer to 12% by habitable room, equating to 77 affordable homes (50 social rented and 27 shared-ownership), and the Planning Statement advises that this was necessary to ensure the deliverability of the proposal. The viability for the proposed 12% affordable housing is set out in the applicant's Financial Viability Assessment Addendum dated December 2024. Whilst there are still some areas of disagreement between the applicant and BPS as explained later in the report, both parties agree that the proposed development is not financially viable and cannot support any affordable housing. The 12% proposed therefore exceeds the maximum viable affordable housing.

300. The proposed level of affordable housing has been raised as a concern by many local residents following public consultation on the application, particularly since it was reduced from 35% to 12%. Many objectors also raise concerns that the new dwellings would be used as second homes and as such would not serve the needs of the local community. Whilst the council and housing associations can exercise control over who can occupy affordable housing due to eligibility criteria, there is no such provision for private homes. Representations received in support of the application comment that too many affordable homes would undermine the viability of the proposed development.

301. A number of detailed viability concerns have been raised by Southwark Law

Centre (SLC) and these are considered later in the report. SLC has also raised more general concerns that there is an acute need for affordable housing in Peckham, that the high level of private housing would likely increase rents in the area and exacerbate deprivation, that the council has stopped its own house building programme, and that the weight to be given to viability appraisals is a matter for the decision maker.

302. 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. Policy H4 of the London Plan 'Delivering affordable housing' states that the strategic target is for 50% of all new homes delivered across London to be genuinely affordable. Policy H5 of the London Plan sets out the threshold approach for affordable housing. Under this policy, developments which would deliver 35% affordable housing can follow the fast-track route which means do not need to be accompanied by an FVA. Applications which fall below this threshold need to follow the viability-tested route, and must be accompanied by an FVA; tenure split requirements for affordable housing are set out under policy H6 of the London Plan.

303. At borough level, strategic policy SP1 of the Southwark Plan 'Homes for all' requires 2,355 new homes to be delivered per annum. Policy P1 of the Southwark Plan 'Social rented and intermediate housing' 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. The policy sets out that for affordable housing purposes a habitable room of up to 28sqm is counted as one habitable room, a room between 28.1-42sqm is counted as two habitable rooms and so on.

304. In Southwark the threshold for following the fast-track route is 40% affordable housing by habitable room, as set out in policy P1. In light of this the planning application was accompanied by an FVA which, together with various updates to the document, has been reviewed by BPS. Following the reduction in affordable housing from 35% to 12% the application no longer meets the London Plan fast-track threshold, therefore the FVA has now also been reviewed by the GLA's Viability Team (GLAVT), which provided a report dated 26th March 2025 and follow-up emails.

305. The 12% affordable housing proposed would equate to 77 affordable homes, comprising 50 social rented and 27 intermediate homes. The social rented homes would be located in block P on the eastern edge of the site within phase 1, and the intermediate homes would be provided in blocks A, B and C on the western edge of the site in phase 2.

Sketch image showing location of affordable homes

306.



307. There would be 2,822 habitable rooms within the development for the purposes of affordable housing, 340 of which would be affordable which would equate to 12%. The proposed tenure split would comprise 8.5% social rented habitable rooms and 3.4% intermediate habitable rooms; it is noted that the Planning Statement gives these figures as 9% and 3% respectively, but policy P1 of the Southwark Plan does not permit rounding up.

308. Mix of affordable homes by type

Unit type	Social rented	Intermediate	Total
1-bed	0	0	0
2-bed	17	27	44
3-bed	15	0	15
4-bed	18	0	18
Total	**50**	**27**	**77**

309. Mix of homes by habitable room

Unit type	Private /	Social	Intermedia	Total

	market habitable rooms	rented habitable rooms	te	habitable rooms
Studios	8	0	0	8
1-bed	706	0	5	711
2-bed	1,066	59	93	1,218
3-bed	702	75	0	777
4-bed	0	108	0	108
Total	**2,482 (87.95%)**	**242 8.58%**	**98 (3.47%)**	**2,822 (100%)**

310. Concerns have been raised during public consultation on the application regarding the quality of the affordable homes including their location on the eastern and western edges of the site, and this is considered later in the report in relation to quality of accommodation. Of note is that most of the affordable homes (33) would be 3 and 4-bedroom social rented homes.

Financial viability

311. Paragraph 59 of the NPPF relates to planning obligations, and sets out that where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at application stage. It goes on to state that the weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and the viability evidence underpinning it is up to date, and any change in site circumstances since the plan was brought into force. All viability assessments, including any undertaken at the plan-making stage, should reflect the recommended approach in the national Planning Practice Guidance, including standardised inputs, and should be made publicly available. Paragraph 66 of the NPPF states that where major development involving the provision of housing is proposed, planning policies and decisions should expect that the mix of affordable housing required meets identified local needs, across social rent, other affordable housing for rent and affordable home ownership tenures.

312. Further viability guidance is contained within the Mayor of London's 'Homes for Londoners Affordable Housing and Viability SPG (2017) and the council's adopted Development Viability SPD (2016). In December 2024 the GLA issued a practice note 'Accelerating Housing Delivery' which sets out a number of measures including continued support for the fast-track route and changes to affordable housing funding. There are also two draft London Plan Guidance documents (LPGs), 'Affordable Housing' (2023), and 'Development Viability' (2023). However, the GLA has advised that it is unclear when the draft LPGs will be adopted, and that they should be given limited weight.

313. As set out above this application needs to follow the viability-tested route and is therefore accompanied by an FVA, an FVA addendum, and various updates and additional information. The applicant's FVA addendum concludes that the

proposed development cannot viability support any affordable housing, and that the 12% proposed is therefore the maximum reasonable amount which can be delivered. Both the applicant and BPS have identified that the scheme would be in deficit, although there is disagreement as to the extent of the deficit. With the provision of 12% affordable housing and the standard profit inputs for market housing, affordable housing and commercial development, the applicant considers that the deficit would be £67,317,696, and BPS considers that it would be £41,428,938; these figures are taken from BPS's report dated 8th April 2025, The respective actual profits would be £39m (7% on GDV) and £84m (15% on GDV). Given the extent of the deficit BPS has questioned the deliverability of the proposed development, and it is noted that paragraph 3.10 of the Mayor's Affordable Housing and Viability SPG requires applicants to demonstrate that their proposal is deliverable and that their approach to viability is realistic.

314. The reason for the difference in the deficit figures between the two parties is that it has not been possible to reach agreement on all of the inputs into the FVA. The GLAVT has also raised concerns regarding a number of the inputs, and the table below summarises the respective positions of each of the parties:

Input	DS2 (April 25)	BPS (April 25)	GLA VT (April 2025)	Applicant Comments
Open Market Sales (inc. AH)	£501,636,686 (£9,257psm/ £860psf)	£501,636,686 (£9,257psm/ £860psf)	£501,636,686 (£9,257psm/ £860psf)	Agreed
Open Market Sales (Full Open Market Housing)	£562,000,000 (£9,299psm/ £863psf)	£562,000,000 (£9,299psm/ £863psf)	£562,000,000 (£9,299psm/ £863psf)	Agreed
Shared Ownership	£10,643,746 (£5,606psm/ £520psf)	£10,643,746 (£5,606psm/ £520psf)	Clarification required	BPS agree to DS2 position on without prejudice basis. GLA appear to agree with this, however, their appraisals have adopted a different figure of £640psf. DS2 have sought clarification from GLA on their position.
Social Rent	£10,158934 (£2,328psm/ £216psf)	£10,158,934 (£2,328psm/ £216psf)	Clarification required	BPS agree to DS2 position on without prejudice basis. GLA appear to agree with this, however, their appraisals have adopted a different figure of

				£263psf. DS2 have sought clarification from GLA on their position.
Commercial	£40,102,387 £40,814,256 (£2,428psm/ £226psf)	£50,093,837 (£4,844psm/ 450psf).	£50,093,837 (£4,844psm/ 450psf).	Disagreed. DS2 and BPS agree that this it is immaterial as values would get picked up as part of the review mechanism. Clarification is required from GLA as they appear to agree with BPS position but have not included a rent free period for the proposed supermarket.
Benchmark Land Value	£29,353,500	£29,353,500	Clarification required	GLA appear to agree with this, however, their appraisals have adopted a different figure of £25,280,000. DS2 have sought clarification from GLA on their position.
Construction Costs (exc. contingency)	£333,296,967	£333,296,967	£333,296,967	Agreed
Contingency	5%	5%	5%	Agreed
Third Party Costs	£5,307,500	£5,307,500	£nil	Agreed between DS2 and BPS. GLA are not against the inclusion of these costs but require further information and have therefore assumed nil until further evidence is provided. Evidence will be provided at the point of the review mechanism.
Tenants Compensati	£4,187,298	£nil	£nil	BPS and GLA are not against

on & Legals				the inclusion of these costs but require further information and have therefore assumed nil until further evidence is provided. Evidence will be provided at the point of the review mechanism.
Post Completion maintenance & service charge voids	£2,370,000	£2,370,000	£2,370,000	Agreed on a without prejudice basis by BPS and GLA
Professional Fees	10%	10%	10%	Agreed
OMS Marketing & Agent Fees	4.7%	3%	3%	Disagreed. Actual costs would get picked up as part of review mechanism.
Commercial Sales Agent, Marketing & Legal fees	1.5%	1.5%	1.5%	Agreed
Letting Agent Fee	10%	10%	10%	In agreement apart from applying letting agent fees to the proposed supermarket. Actual costs would get picked up as part of review mechanism.
Letting Legal Fees	5%	5%	10%	In agreement apart from applying letting legal fees to the proposed supermarket. Actual costs would get picked up as part of review mechanism.
Affordable Sales legal fee	0.50%	0.50%	0.50%	Agreed
CIL	£12,465,088	£12,465,088	£12,465,088	Agreed, however, figures

				are approximates and can only be finalised once planning permission has been granted. All parties reserve the right to update figures should the level of obligations change
S106 charges (Carbon Offset)	£880,000	£880,000	£800,000	Agreed, however, figures are approximates and can only be finalised once planning permission has been granted. All parties reserve the right to update figures should the level of obligations change
Finance	8%	7%	7%	Disagreed. Actual costs would get picked up as part of review mechanism.
Profit: OMS Affordable Housing Commercial Supermarket	20% 6% 15% 10%	20% 6% 15% 10%	Clarification required	DS2 have sought clarification from GLA on their final position.
Pre-construction Period	6-months (phase 1) 3- months (phase 2)	6-months (phase 1) 3- months (phase 2)	6-months (phase 1) 3- months (phase 2)	Agreed
Construction Period	100-months (8.3 years)	100-months (8.3 years)	100-months (8.3 years)	Agreed
Sales Rate	Unclear	6 units pcm	6 units pcm	Agreed
Viability Position (inc. affordable)	**-£67,335,933 (11.97% on GDV) (12%AH)**	**-£41,428,938 (7.2% on GDV) (12%AH)**	Clarification required	Disagreed
Actual Profit/ Loss (inc. affordable)	**+£39,348,927 (7% on GDV) (12% AH)**	**+£84,387,625 (15% on GDV) (12%AH)**	Clarification required	Disagreed

315. Southwark Law Centre (SLC) has also made comments regarding some of the inputs into the FVA, the first of which is that the existing use value for the site is too high given that the applicant has claimed that the existing buildings are in a poor condition; SLC also considers that the EUV with the addition of a landowners

premium (EUV+) is not appropriate for this development. In response BPS has advised that the applicant has provided some evidence in respect of future repairs required to the existing shopping centre, and this has been taken into account in BPS's assessment. BPS also note that the shopping centre is currently occupied, in which case the assumption of a nil EUV would not be appropriate. BPS has received a rental schedule outlining the current tenancies, and note that although the shopping centre is dated, it is clearly capable of occupation. Given that it is an income-generating asset, BPS consider the inclusion of a landowner premium to be appropriate, but consider that the 20% adopted by the applicant was overly optimistic given the age of the building. BPS has therefore adopted a 10% landowner premium in their assessment, and this has been accepted by the applicant. It has therefore been agreed that the existing use value of the site should be £26,418,150 plus a 10% landowner premium.

316. Both SLC and the GLA's Viability Team have raised concerns that a 20% developer profit on the open market homes is too high. SLC notes that viability evidence underpinning the 2021 London Plan only sets a 20% return for buildings over 20-storeys, of which there would be none within the proposed development; the GLA's Viability Team has advised that many applications referred to the GLA Viability Team include a developer's profit no greater than 17.5% of GDV for private residential sales. Whilst this is noted, BPS has accepted 20% on the basis that the proposed development is a multi-phase scheme which is expected to be delivered over eight years, during which many inputs could change. This therefore poses additional risk to the developer. It is also noted that this would be in line with the viability section of the National Planning Practice Guidance which advises that 15-20% profit on gross development value (GDV) may be considered a suitable return for developers.

317. SLC has raised concerns that the applicant's appraisal includes a 10% profit on the new supermarket, and that paragraph 4.3.34 of the draft Viability LPG suggests that it should be "nominal" as it would be for Morrisons, a returning tenant. In response BPS has advised that whilst it is recognised that the risk associated with a returning tenant with a pre-let arrangement would be lower than a typical commercial unit, they do not consider a nominal return to be realistic. This is because there would be other types of risks associated with the delivery of the supermarket, such as construction management, and this needs to be reflected in the appraisal. Moreover, BPS has commented that it would not be a realistic market expectation for the applicant not to receive any return for the works, and as such a 10% profit is considered to be reasonable.

318. As set out in the table, some of the inputs where it has not been possible to reach agreement would be picked up through review mechanisms when the actual costs and values are known. Viability review mechanisms assess the viability of the development as the scheme progresses, to establish whether any additional affordable housing can be delivered. The council's adopted Development Viability SPD requires any surplus identified through review mechanisms to be split 50:50 with the council, with the council's share to be used towards additional affordable housing which would be on-site for early and mid-stage reviews and most likely a payment-in-lieu for the late stage review. If permission is granted on appeal, officers would expect it to be subject to early, mid and late-stage reviews, and the

applicant would need to provide a plan identifying where on the site they would expect to provide additional affordable homes.

319. The GLAVT has concerns with leaving many of the inputs to review mechanisms, on the grounds that an early stage review might not be triggered (they are generally only triggered if the development has not reached a certain stage of construction within a specified timeframe), and that large deficits within legal agreements can make it difficult to secure additional affordable housing through viability reviews. Whilst this is noted, BPS has advised that their figures should be included in any s106 agreement in order to establish an appropriate baseline for future viability reviews, and this would be discussed during the appeal.

320. The GLAVT has advised that growth and inflation testing should be carried out on all proposed developments exceeding c.400 homes and, especially, where there is a longer, multi-phased construction period. A similar comment has been made by Southwark Law Centre which considers that the predicted sales values for the proposed development should better reflect the likelihood of increased house prices in Peckham by the time the sales values are realised. In response, BPS (for the council) has confirmed that sensitivity analysis has been included in their assessment, which essentially considers how much sales value growth would be required for the scheme to become viable. BPS has advised that although future growth and inflation indicators could have an impact on the developer's decisions, they do not consider there to be a solid enough evidence basis at the moment to support incorporating these into the viability outcome. This is because there is limited evidence in the market as whole to suggest sustained value growth above general cost inflation. Moreover, in accordance with the Royal Institute of Chartered Surveyors (RICS) guidance on Assessing viability in planning under the National Planning Policy Framework (March 2021), viability should be considered on a present-day basis and increases in sales values over time would be captured through review mechanisms.

321. The GLAVT considers that the impact of grant funding should be taken into account in the FVA, and has modelled a scenario where 40% affordable housing is provided in phase 1, all within the social rented tenure, with grant funding included. The GLAVT considers that this would improve the viability of the scheme by increasing cash flow from the affordable homes early in the development process, and would be less risky in terms of finding occupiers for the homes. However, the applicant has not modelled this scenario on the basis that the scheme would not currently be eligible for grant funding.

322. The applicant's FVA uses the residual method of valuation which is where a fixed Benchmark Land Value (BLV) and all expected construction costs as well as the profit target on gross development value (GDV) is deducted from the gross development value. The GLAVT has commented that the scheme should be valued using the Internal Rate of Return (IRR) method which is an alternative measure of expected developer's profit which is especially useful in long, multi-phase schemes. Although BPS consider the IRR analysis to be an appropriate method of measuring the return given the long development period, profit on GDV (used by both parties) and IRR-based targets are not readily interchangeable nor necessarily supportive of each other; as they are effectively

unrelated. Unlike a profit based on GDV, there is limited evidence from other schemes which would specify an appropriate IRR to be used in this instance . As such whilst valuing the scheme based on IRR may make the viability more marginal, given that the applicant is not deviating from a generally accepted measure of profit, there is no reasonable basis for an alternative method to be imposed as the primary approach to testing viability.

323. Regarding the deliverability of the proposed development, the applicant has advised that 12% affordable housing can be delivered and that a commercial decision on this has been made based on the risk profile of the proposed development and with regard to the eight year build programme.

Community Land Trust (CLT) homes

324. Site allocation (NSP74) states that redevelopment of the site must provide new intermediate affordable housing through a community land trust. CLT homes are defined in the Southwark Plan as 'homes for sale where values are capped by a fixed multiple of household income for eligible residents and allocated to eligible residents. Community Land Trust homes remain affordable in perpetuity'. SLC has raised concerns that the application proposes no CLT homes and therefore breaches this clear site allocation requirement; SLC considers that the provision of CLT homes should not be subject to viability.

325. Under the Southwark Plan CLT homes are considered to be intermediate homes, and officers therefore consider that they should reasonably be subject to viability. Whilst it is understood that the appellant has had some initial discussions with a CLT organisation and had previously identified block Q as a potential location for CLT homes (prior to the overall reduction in affordable housing), these discussions are understood to have been some time ago. Officers understand that the main sticking point was agreeing the way in which the CLT homes should be valued, with the appellant wishing to value them on the basis of shared-ownership homes and the CLT organisation wishing to value them based on fixed multiples of household incomes in the area, creating a funding gap.

326. The Planning Statement (July 2024) advises that the applicant will continue to proactively engage with the council and other relevant stakeholders, including community land trusts, with the aim of agreeing terms for the viable disposal of a number of intermediate homes to a community land trust (CLT). Given that there is currently no agreed method of valuing these homes, this does not offer any certainty that CLT homes would come forward in the development. CLT homes are an explicit requirement for the site allocation and this type of housing is not proposed as part of the development.

327. To conclude: the proposed development would provide 12% affordable housing by habitable room, which would equate to 77 affordable homes (50 social rented and 27 intermediate). This would be significantly below the minimum 35% required by policy, although it is noted that this is subject to viability. The viability of the proposed development has been independently reviewed by BPS on behalf of the council, and BPS has concluded that the proposed development cannot support any affordable housing. The proposed 12% would exceed the

maximum viable, and the applicant has taken a commercial decision on its ability to provide this, bearing in mind the eight year build programme and risk profile of the development. Whilst the level of affordable housing would not be contrary to policy in viability terms, officers consider that the extent of affordable housing benefit secured is material to the assessment of the extent of public benefits delivered by the proposal. Whilst it may be possible to increase the affordable homes through review mechanisms, this is not guaranteed. Given the pressing need for affordable homes in the borough, officers are of the view that the 12% affordable housing proposed and the uncertainty around the ability to deliver any CLT homes reduce the extent of public benefits delivered by the scheme. This is relevant to the planning balance as to whether the heritage harm is outweighed by sufficient public benefit, which is addressed further below in the conclusion and planning balance section.

Housing mix

328. Policy P2 of the Southwark Plan 'New family homes' requires a minimum of 60% of the homes to contain two or more bedrooms with a mix of 2-bed 3 person and 2-bed 4 person homes, and a minimum of 25% of the new homes to contain three or more bedrooms in the Urban Zone. A maximum of 5% studio flats are permitted and these can only be in the private tenure.

329. The scheme would provide a variety of different size of properties and this is highlighted below:

Homes	Private Homes	Aff. SR Homes	Aff. Int Homes	Homes Total (% of total)
Studio	4	0	0	4
				0.5%
1b1p	86	0	0	86
				9.9%
1b2p	252	0	2	254
				29.3%
2-bed	308	17	25	350
				40.4%
3-bed	140	15	0	155
				17.9%
4-bed	0	18	0	18
				2.1%
Total and % of total	790	50	27	867
	91.1 %	5.8%	3.1 %	100.00 %

330. The above table confirms that the proposed development would be in compliance with the 60% requirement for 2 bed + units as set out in policy P2 (60.4% of the proposed flats would be 2 bed or larger.) The proposed development would be located within the Peckham Action Area Core and would provide the required 20% 3+ bedroom homes.

331. Studio flats – A number of letters of objection have raised concerns with regards the unit mix and in particular, the number of studio flats. The Southwark Plan defines a 'studio' as homes with only one main room with no separate bedroom. Only four of the proposed 867 properties would fit within this definition of not having a separate bedroom, and these would all be private sale properties.

332. There would then be 86 x 1b1p flats (all private sale) which would have a separate bedroom measuring under 12sqm. As the size of the bedrooms would be under 12 sqm, they would be classed as a single bedrooms which means that these properties would be defined as 1b1p flats. An example of the layout of these units is shown below – (1b1p - flat BE-00-07, located on Floor 1 in Block E):

333. 

334. The single bedrooms for these properties would be above 7.5 sqm, so would be in compliance with the minimum requirement for a single bedroom (as set out in the Council's Residential Design Standards SPD as well as the Technical Housing Standards). Given that there is a separate bedroom and given the size of the room (being defined as a single bedroom), this property would be defined as a 1-bedroom, 1 person flat and not a studio flat.

335. In terms of unit mix, policy P2 of the Southwark Plan states that a maximum of 5% (of the proposed unit mix) should be 'studios'. As referenced above, the application would provide four 'studio' apartments which would equate to a 0.5% provision. This would therefore be in compliance with this policy requirement.

336. The layout of the studio and 1b1p flats was raised as an issue by the Southwark Law Centre and many of the other objections received, which consider that these homes would not provide a good standard of accommodation. They also considered that the 1b1p, where the bedroom would only have enough room for a single sized bed, would fail to meet housing needs. As shown in the image above, the flats would provide a good standard of living for one person. The kitchen and lounge would be of a good size and the bedroom could readily

accommodate a single bed. These would therefore provide a good standard of accommodation and with regards the number of flats that would be provided, these would be in compliance with policy.

337. Numerous objection letters also drew attention to the Greater London Authority (GLA) requiring 16% of the proposed development to be 4 bedroom+ properties. This was raised directly with the GLA who confirmed that there is no policy basis for this requirement. The GLA drew attention to Policy H10 which references the requirement to deliver mixed and inclusive neighbourhoods. This policy does not reference the 16% figure.

338. Policy H10 of the London Plan makes reference to well-designed one- and two-bedroom units in suitable locations and how these can attract those wanting to downsize from their existing homes. As the proposed development would provide a good mixture of both smaller and larger flats, the development would be in compliance with the policies referenced above as well as AV14 of the Southwark Plan (Peckham Area Vision).

Wheelchair housing

339. 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 P8 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.

340. In total, there would be 784 accessible and adaptable dwellings to M4(2) standard and there would be 83 wheelchair user dwellings to M4(3) standard. This would equate to 90.4% provision of M4(2) homes and 9.6% provision of M4(3) homes with regards the total number of properties. This is technically under the 10% requirement (as set out in Policy D7 of the London Plan) but given that you cannot have 0.4% of a dwelling, this would need to be rounded up to 10%, which would be in compliance with this policy. In terms of habitable rooms, 287 would be M4(3) compliant which equates to a 10.2% provision. This is therefore in compliance with policy P8 of the Southwark Plan.

341. The council's Public Health Team has noted that the wheelchair housing would be located all around the site and suggested that they be clustered together nearer the car park and bus stop. Whilst this is noted and this change could provide benefits in terms of transportation, the proposed siting all around the development would allow greater flexibility with regards shortening the access to facilities such as local shops both within the site as well as outside of the site, such as on Rye Lane. The suggested siting is therefore noted but the proposed siting would have an acceptable impact.

342. With regard to the Social Rented properties, five out of the 50 would be M4(3) properties. This would equate to a 10% provision and would be in compliance with policy.

343. The following mix of M4(3) units are being proposed:

Private homes

1b2p = 22 homes
2b3p = 29 homes
2b4p = 27 homes
Total private = 78 (9%)

Social rented homes

2b4p = 5 homes
Total private = 5 (1% - rounded up)

(For the avoidance of doubt, the 1% is with regards the total number of flats. The 10% figure referenced above relates to the proposed affordable properties only and that 5 out of the 50 would be M4(3) dwellings which equates to 10%. There would also be zero 2b3p affordable properties. It would therefore be in compliance with this part of the policy.)

Shared ownership

0 - Zero

Overall total = 83 homes

344. As referenced above, there would be 5 (five) M4(3) social rented homes and these would have an enlarged GIA as required by Policy P8 of the Southwark Plan. For example, these would have a GIA of 87.2 sqm which is 2.2 sqm above the minimum requirement set out in Policy P8 (85 sqm).

345. The marketing of these units to wheelchair users, and confirmation of how the social rent flats would include the enhanced fit out standards for the affordable wheelchair units (as set out in policy P8 table 5) could be secured as a planning obligation in the event that permission is granted on appeal. The proposed development would therefore provide good quality wheelchair homes.

Quality of accommodation

346. Policy D6 of the London Plan ‘Housing quality and standards’ requires housing developments to be of high quality design, and to provide adequately-sized rooms with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures.

347. Policy P15 of the Southwark Plan requires developments to achieve an

exemplary standard of residential design and sets out a number of criteria which must be met. The Council's Residential Design Standards SPD establishes minimum room and overall flat sizes dependant on occupancy levels, and units should be dual aspect to allow for good levels of light, outlook and cross-ventilation

Number of flats per core:

348. Planning policy P15 of the Southwark Plan states that a development should avoid having more than eight flats accessed from a single core per floor. The proposed development would vary with regards the number of flats per core, such as block M which would have nine flats per core on the lower levels, decreasing higher up the building.

349. The following table references the number of flats per core . This can vary depending on the layout/ unit mix:

Block	**Dwellings per core**
Block ABC	8-14 (varies – 2 cores)
Block D	N/A – commercial
Block E	9
Block F	4
Block G	6-7 (varies)
Block H	5-6 (varies)
Block J1	4-9 (varies)
Block J2	4
Block K	8-13 (varies – 2 cores)
Block L	10 (5 in top level)
Block M	9 (3 in top 2 levels)
Block N	4-8 (varies)
Block P	5 (4 in top level)
Block Q	6

350. Of note is that block ABC has been shown as a single building, but it would have two cores and two entrance lobbies.

351. The most flats per core would be associated with Block L and the floor plan of this block is shown below. This would accommodate ten flats per core:

Proposed layout of block L



352. The lifts for this block would be located in the middle of the floorplan and there would be a secondary stair at the end of the deck access. The number of flats per core would be above that recommended by policy P15 (at eight flats per core), but the layout is considered to be acceptable and would have an acceptable impact upon the living conditions of the future residents.

Dwelling sizes

353. All of the new homes would meet or exceed the minimum overall floorspace requirements set out in the Nationally Described Space Standards. All of the homes would also meet the required storage spaces set out in the council's adopted Residential Design Standards SPD. All of the bedrooms would meet the requirements of policy D6 of the London Plan which requires bedroom widths to be at least 2.15m for single bedrooms, 2.75m for a first double bedroom and 2.55m for a second double bedroom, and for single bedrooms to be at least 7.5sqm.

354. The table below shows the size and proportions of the flats along with the proposed amenity space:

Flats	**SPD minimum requirement**	**Proposed home sizes sqm**	**SPD amenity space minimum sqm**	**Amenity space proposed sqm**
Studio	37-39	43.9	10	10
1b1p*	37 - 39	37.1-43.6	10	5-11.3
1b2p	50	50.1-67.7	10	5-15

2-bed	Single storey: 61-70 Duplex: 70-79	61.3-92.7 79.6–96.5	10 10	5-31.3
3-bed	Single storey: 74-95 Duplex: 84-102	86.1-107.4 115-136.3	10 10	9.1-55
4-bed	90-117 (4b6p=-99)	104.24 (all)	10	10-35.1

* The applicant has confirmed that all the studio and 1b1p flats under 39sqm, would have a shower and not a bath as required by the Technical Housing Standards

355. With regard to the social rented dwellings, the GIA for these would range from between 0.3 sqm to 17.2 sqm above the minimum requirement (as set out in the National Dwelling Space Standards as well as the Council's Residential Design Standards SPD). For the Intermediate housing the GIA would range from between 3.6 sqm to 8 sqm above the minimum requirement. For private sale flats, the GIA would range from 6.5 sqm to 22.5 sqm above the minimum requirement.

356. The dwellings have been designed to a minimum of 2.5m floor to ceiling covering at least 75% of the area of the dwelling (and a minimum of 2.3m in the rest of the flat which would typically occur in the bathrooms). This would be in compliance with the requirements as set out in the London Plan.

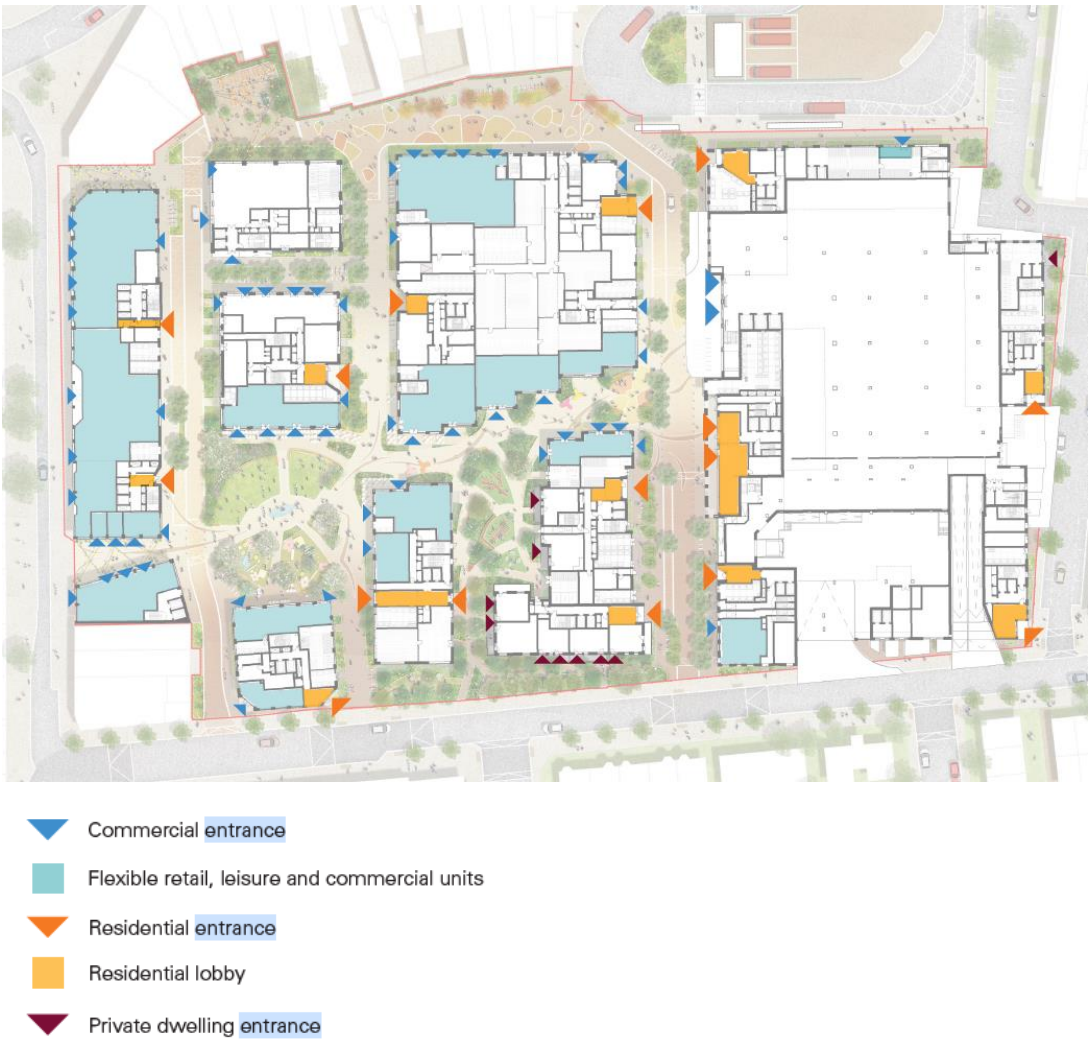
357. The majority of the proposed room sizes would be in accordance with the Residential Design Standards SPD, although 232 (27%) of the proposed open plan living / kitchen / dining spaces would not comply with this guidance, with shortfalls ranging from 0.1-3sqm. Most of these (136) would be one-bedroom flats which is where most of the larger shortfalls would occur, together with 67 x 2-bed flats and 29 x 3-bed flats. This would mainly affect private homes (217), together with 15 x 3-bed 5 person social rented homes which would have a 1sqm shortfall in these rooms. Whilst these shortfalls are noted, the homes would meet or exceed the overall floorspace requirements and all of them would have access to private amenity space. It is considered that these homes would provide a good standard of accommodation nonetheless.

Access/ entrance to flats:

358. The proposed access to the new flats would be located in various positions within

the site. For instance, there would also be access points from Hanover Park and McKerrell Road. There would be no access from Rye Lane.

359. The following image shows the access points to all the flats and the lobbies are highlighted in yellow with the access an orange arrow. The access to the ground floor properties that have a separate entrance are also shown as a red arrow.



360. It is noted that the access points for a number of the blocks would be in close proximity to the servicing/ on-street loading spaces. This is not unusual for developments of this complexity providing the uses needed in a town centre.

Internal daylight and sunlight

361. A daylight and sunlight assessment for the proposed dwellings has been submitted, based on the Building Research Establishment (BRE) Guidance (2022). This guidance provides advice, but also clearly states that it "is not mandatory and the guide should not be seen as an instrument 104 90 of planning policy." The guidance also acknowledges in its introduction that "Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout. In special circumstances the developer or

planning authority may wish to use different target values. For example, in an area with modern high-rise buildings, a higher degree of obstruction may be unavoidable if new developments are to match the height and proportions of existing buildings". The BRE guidance uses two methods for assessing the daylight quality within new developments: the illuminance method and the daylight factor method, details of which are set out below.

362. The illuminance method - Climate Based Daylight Modelling (CBDM) is used to predict daylight illuminance using sun and sky conditions derived from standard meteorological data (often referred to as climate or weather data). This analytical method allows the prediction of absolute daylight illuminance based on the location and building orientation, in addition to the building's daylight systems (shading systems, for example). The guidance proposes target illuminances to exceed 50% of daylight hours across half the room.
This is considered to be the most accurate approach when using climate data, however, it provides a very large amount of data for each assessed room which then needs to be interrogated.

363. The guidance sets out a minimum illuminance level that should be exceeded over half the space for more than 50% of the daylight hours in the year. Within high density residential settings the following targets apply:

- 100 lux for bedrooms
- 150 lux for living rooms
- 200 lux for living/kitchen/diners, kitchens, and studios.

364. With regards daylight, a sample of the 867 dwellings has been considered within each of the proposed buildings. The sample that was tested comprises of rooms situated at first floor level, which is the lowest residential floor level of each building. This was chosen because the rooms located here are most likely to experience lower light levels than units located on the upper floors. Two additional floors were tested within each building at every other level, meaning accommodation at first, third and fifth floor levels were tested. Overall there would be a compliance rate of 67% and the impact has been broken down into the corresponding buildings.

365. It should be noted that the submitted report has assessed the LKD rooms against a lux level of 150 and not the recommended 200 lux as referenced above. This was raised during the course of the application and attention was drawn to the location of the kitchens and these either being to the side or rear of the flats. When assessing the submitted results, it appears that 16 LKD would have lux levels below 200.

Block A:

366. Of the 28 rooms that were tested, 14 would be in compliance with the above guidance which equates to 50% compliance. Of the 14 that would not be in compliance, 7 would be bedrooms and 7 would be living/ kitchen dining rooms (LKDs).

367. 6 of the 7 bedrooms that would fall short of the guidance, would be located under the overhanging walkway on the eastern side. The other bedroom would have its window located in a recess under a balcony, which given the siting, would restrict access to skylight. The bedrooms that fail would achieve a lux level of between 6.7 (lux) to 91.7 (lux) which is up to 93.3 (lux) below the required level. It is noted that a bedroom would mainly be utilised at night time and BRE guidance also states that living rooms and kitchens need more daylight than bedrooms. These rooms would however require a high reliance on artificial light.

368. With regards the 7 LKDs that would fall short of the guidance, the main windows would be located under projecting balconies. These spaces would achieve between 30 (lux) to 116.3 Lux on the first floor. On the third floor, the results would increase from between 85.5 (lux) to 284.3 lux. The LKD's on the fifth floor would be in compliance with required lux levels. This means that 4 properties on the first floor would be up to 170 lux beneath the guidance and would require a high reliance on artificial light.

Block B:

369. Of the 36 rooms that were tested, 9 rooms would be in compliance which would equate to a 25% compliance rate. 27 rooms would not be in compliance (with the required lux levels) and these would be 24 bedrooms and 3 LKDs.

370. The bedrooms that would fall short, would have a lux level of from between 16.6 (lux) to 68.1 lux. This is up to 83.4 lux beneath the guidance for bedrooms so could require a high reliance on artificial light. These would be located on all floors (first, third and fifth).

371. With regards the lux levels for the 3 LKDs that would fall short, these would range from 141.1 to 144.6 lux and would be located on the first floor. The LKDs on the third and fifth floors would be in compliance.

372. This building contains 1 of the 16 LKDs that would be affected by the 150/200 lux testing issue. The report has stated that 1 of the LKDs would receive 151.6 lux and that this would be above the 150 lux levels so would be in compliance.

Block C:

373. 19 out of the 30 rooms that were tested would be in compliance with the recommended guidelines. This would equate to 63.3% compliance. Of the 11 rooms that would fall short, 6 are bedrooms, and 5 are LKDs.

374. Like with Building B, the bedrooms would be located on the eastern elevation and would be hindered by walkways. The bedrooms that would fail, would be compromised by balconies range from 15 (lux) to 51.4 lux which is a maximum shortfall of 75 lux.

375. The LKDs would again be affected by overhanging balconies and the shortfall would range from 43.6 to 126.7 lux.

Block D:

376. This is purely a commercial unit. This has therefore not been considered.

Block E:

377. 22 out of the 54 rooms that were tested would be in compliance with the recommended guidelines. This would equate to 40.7% compliance. Of the 32 rooms that would not be in compliance, 14 are bedrooms,12 would be LKD's and 6 would be associated with studio/ 1b1p flats.

378. As noted with other properties/ other blocks, the proposed design would impact upon the amount of light that would be received, such as overhanging balconies inhibiting light into properties. The location of the bedrooms in this block, generally being in the midsection, would also have windows either directly under or between the two adjacent balconies.

379. Of the 14 bedrooms that would not comply, these would have a lux level from between 33.6 (lux) to 96 lux.

380. The LKDs that would fall short would range from 30.1 (lux) to 181.5 lux..

381. With regards the 'studio flats', these would range from 26.2 (lux) to 152.2 lux.

382. This building contains 2 of the 16 LKDs that would be affected by the 150/200 lux testing issue. The report has stated that x2 of the LKDs would receive 168.2 and 181.5 lux and that these would be above the 150 lux levels so would be in compliance.

Block F:

383. Out of the 42 rooms that were tested, 1 would fail be in compliance with the recommended guidelines which would equate to a 97.6% compliance rate. With regards the 1 room that would not be in compliance, this would be a LKD and would receive a lux level of 136.7 lux.

Block G:

384. 9 out of the 52 rooms that were tested would comply with the recommend guidelines which would equate to a compliance rate of 17.3%. Of the 43 rooms that would not comply, 27 would be bedrooms,13 would be LKD's and 3 would be associated with studio/ 1b1p flats.

385. Of the 27 bedrooms that would not comply, these would have a lux level from between 26.3 (lux) to 221.8 lux. This is up to 73.7 lux below the recommended guidance which suggests that rooms would need a high reliance on artificial light. This would occur on all floors, first, third and fifth.

386. The LKD's would range from 28.4 (lux) to 94.5 lux beneath the guidance. This is

up to 171.6 lux beneath the guidance which suggests a high reliance upon artificial light. This would occur on all floors, first, third and fifth.

387. With regards the 'studio flats', these would range from 28.4 (lux) to 321.7 lux. These would therefore be up to 171.6 lux beneath the recommended guidance which suggests that there would be a high reliance on artificial lighting.

Block H:

388. Out of the 50 rooms that were tested, 30 would be in compliance with the recommended guidelines which would equate to a pass rate of 60%. Of the 20 rooms that would not comply, 12 are bedrooms and 8 are LKD's.

389. Of the 12 bedrooms that would not comply, these would have a lux level from between 16.6 to 81.2 Lux. This is up to 83.4 lux below the recommended guidance which suggests a high reliance on artificial light. This would occur on all floors, first, third and fifth.

390. Of the 8 LKD's that would not be in compliance, these would obtain a lux level of between 23.3 (lux) to 135 lux which is up to 176.7 lux below the guidance. The affected properties are not purely located on the lower floors and are affected on both the 3rd and 5th floors. These results suggest that these rooms could require a high reliance on artificial light.

391. This building contains 2 of the 16 LKD's that would be affected by the 150/200 lux testing issue. The report has stated that x2 of the LKD's would receive 185.6 and 184.2 lux and that these would be above the 150 lux levels so would be in compliance. When these rooms are assessed against the 200 lux levels required by the guidance, these would be 14.4 (lux) and 15.8 lux beneath the 200 lux guidance.

Block J:

392. Of the 59 rooms that were tested, 29 would be in compliance with guidelines which would equate to a pass rate of 49.2%. Of the 30 rooms that would fall short, 10 are bedrooms, 14 are LKD's and 6 are 1b1p/ studio properties.

393. Of the 10 bedrooms that fall short of the guidance, these would have a lux level of between 17.1 (lux) to 74.2 lux. This would be up to 82.9 lux beneath the recommended guidance. This would occur on all the tested floors.

394. Of the 14 LKD's that would not be in compliance, these would have a lux level of between 39 (lux) to 134.6 lux. This would be up to 161 lux beneath the recommended guidance. This would occur on all the tested floors.

395. This building contains 1 of the 16 LKD's that would be affected by the 150/200 lux testing issue. The report has stated that the LKD's would receive 182.8 lux which is above the 150 lux level so would be in compliance. When this rooms is assessed against the 200 lux levels required by the guidance, it would be 17.2 lux beneath the 200 lux guidance.

396. With regards the ‘studio flats’, these would range from 32 (lux) to 477 lux. These would therefore be up to 171.6 lux beneath the recommended guidance which suggests a high reliance on artificial lighting.

Block K:

397. Of the 85 rooms that were tested, 30 would be in compliance with the guidelines which would equate to 35.3%. Of the 55 rooms that would not be in compliance, 27 would be bedrooms, 25 would be LKD’s and there would be 3x1b1p/ studio properties.

398. The 27 bedrooms that would not be in compliance with the recommended guidance, would have a lux level of between 31.6 (lux) to 93.4 lux. This would be up to 68.4 lux beneath the guidance. This would occur on all the tested floors.

399. Of the 25 LKD’s that would not be in compliance, these would have a lux level of between 31.4 (lux) to 135.7 lux. This would be up to 168.6 lux beneath the guidance and would suggest that these rooms would require a high reliance on artificial light. This would occur on all the tested floors.

400. With regards the ‘studio flats’, these would range from 26.9 (lux) to 47.7 lux. These would therefore be up to 173.1 lux beneath the recommended guidance which suggests a high reliance on artificial lighting.

Block L:

401. 82 rooms were tested and there would be a compliance rate of 57.3%. This means that 47 rooms would be in compliance with the guidance and 35 would fail. Of the 35 rooms that would fail, 13 are bedrooms and 22 are LKD’s.

402. With regards the bedrooms that would fail, these would receive a lux level from between 42.2 to 99.3 lux which would be 57.8, to 0.7 lux beneath the 150 lux guidance. Concerning LKD’s, these would range from between 30.8 to 143.5 lux which would be between 169.2 and 56.5 lux beneath the 200 lux requirement. This would occur on all the tested floors.

403. This building would contain 2 of the 16 LKD’s that would not comply with the 150/200 lux level issue. The LKD in flat F5/3105 would obtain 156.9 lux whilst the LKD in flat F5/3103 would obtain a lux level of 162.8. This is 43.1 lux and 37.2 lux below the 200 lux guidance. This would occur on all the tested floors.

Block M:

404. 68 rooms were tested and there would be a compliance rate of 60.3%. Of the 27 rooms that would not be in compliance, 13 are bedrooms, 12 are LKD’s and 2 are studios/ 1b1p flats.

405. Building M is the tallest building within the site with residential dwellings projecting up to the twentieth floor. With regards the 13 bedrooms that would not

be in compliance with the guidance, these would have a lux level from between 23.3 (lux) to 80 lux. This would be up to 76.7 lux beneath the recommended guidance.

406. In reference the LKD's, the rooms that would not be in compliance with the guidance would range from 43.7 (lux) to 145.6 lux. This is up to 156.3 lux beneath the recommended guidance. This would occur on all the tested floors.

407. This building would contain 4 of the 16 LKD's that would not comply with the 150/200 lux level issue. The LKD in flat R17/3202 would obtain a lux level of 174.1, the LKD in flat F2/3204 would obtain a lux level of 151.8, the LKD in flat F2/306 would obtain 194.6 lux whilst the LKD in flat F4/3206 would obtain a lux level of 191.6. This would be between 48.2 lux and 5.4 lux beneath the recommended guidance of 200 lux. This would occur on all the tested floors.

408. With regards the 'studio flats', these would range from 140.1 (lux) to 289 lux. These would therefore be up to 59.9 lux beneath the recommended guidance which suggests that they would receive a level of light but would still be under the recommended guidance.

Block N:

409. 47 rooms were tested with a compliance rate of 70.2%. Of the 14 rooms that would not be in compliance, 5 would be bedrooms and 6 would be LKD's. 3 of these would be 1b1p flats.

410. Of the 5 bedrooms that would not be in compliance, these would have a lux level of 52.9 (lux) to 88.4 lux. This would therefore be up to 47.1 lux beneath the recommended guidance. This would occur on the first and third floors. The bedrooms on the fifth floor would be in compliance.

411. Of the 6 LKD's that would not be in compliance, these would have a lux level of 34.7 (lux) to 147.7 lux. This would be up to 165.3 lux beneath the minimum guidance. This would suggest a high reliance on artificial light. This would occur on all floors.

412. This building would contain 3 of the 16 LKD's that would not comply with the 150/200 lux level issue. The LKD in flat F7/3303 would obtain a lux level of 151.6, the LKD in flat F6/3305 would obtain a lux level of 166.4, the LKD in flat F7/3305 would obtain 176.9 lux whilst the LKD in flat F8/3305 would obtain a lux level of 179.7. This would be between 48.4 lux and 23.1 lux beneath the recommended guidance of 200 lux.

Block P:

413. This building is slightly different to the other blocks, in that this building contains properties that have a separate kitchen. 71 rooms were tested which equates to a compliance rate of 70.4%. This means that 21 rooms would fail to meet the guidelines and of these, 8 are kitchens, 11 are bedrooms and 1 is a living room.

414. The kitchens would require a lux level of 200 and the kitchens that would not comply with this recommendation, would range from between 46.2 to 176.1 lux. This is between 153.8 and 23.9 lux below the 200 lux guidance. These rooms could therefore require a high reliance upon artificial light. This would occur on all floors.

415. With regards the bedrooms, these would require a lux level of 100 and the rooms that would fail would have a lux level of between 44 to 95.8 lux. This would be from between 56 to 4.2 lux under the required 100 lux. This would occur on all floors.

416. In reference to the only LKD's that would not be in compliance, these would receive a lux level of 90.4. This is 109.6 lux under the required 200 lux. This therefore suggests a good reliance on artificial light.

Block Q:

417. 38 rooms were tested and 16 would be in compliance with the guidance which would equate to a pass rate of 47.1%. Of the 18 rooms that would not be in compliance, 12 would be bedrooms and 6 would be LKD's.

418. With regards the bedrooms that would fail, these would receive a lux level from between 33 to 94.2 lux which would be between 67 to 5.8 lux beneath the 150 lux guidance. Concerning LKD's, these would range from between 28.9 to 125.7 lux which would be 171.1 to 74.3 lux beneath the 200 lux requirement. This would occur on all the tested floors.

419. This building would contain 1 of the 16 LKD's that would not comply with the 150/200 lux level issue. The LKD in flat F1/3401 would obtain 189 lux. This is 11 lux below the 200 lux guidance. These flats would still require artificial light but not as much as other rooms within the site.

Internal sunlight:

420. With regard to sunlight (to new dwellings), the BRE guidance recommends that:

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

421. A daylight and sunlight assessment based on the 2022 BRE guidance has been submitted, which uses the above criteria for testing daylight to the proposed flats. It concludes that 57% of the flats would have at least one room meeting the above requirements.

422. These results would also be impacted upon by overhanging balconies. Attention is also drawn to this being an allocated site as well as being within the centre of Peckham. These tests additionally also only relate to 3 floors and given the lack of tall buildings surrounding the site, the results are likely to improve when assessing the upper floors. These tests have not been carried out but there is a

high level of probability that they would provide better results than what is stated above.

Aspect:

423. There would be 244 single aspect properties. These would relate to 4 studio properties, 197 one-bed flats and 43 two-bed flats. There would be no 3-bedroom and above properties that would be single aspect. The mixture of single, enhanced single aspect, dual and triple aspect is shown in the table below. There would also be zero north facing single aspect dwellings. The following table shows the single, enhanced, dual aspect and triple aspect dwellings:

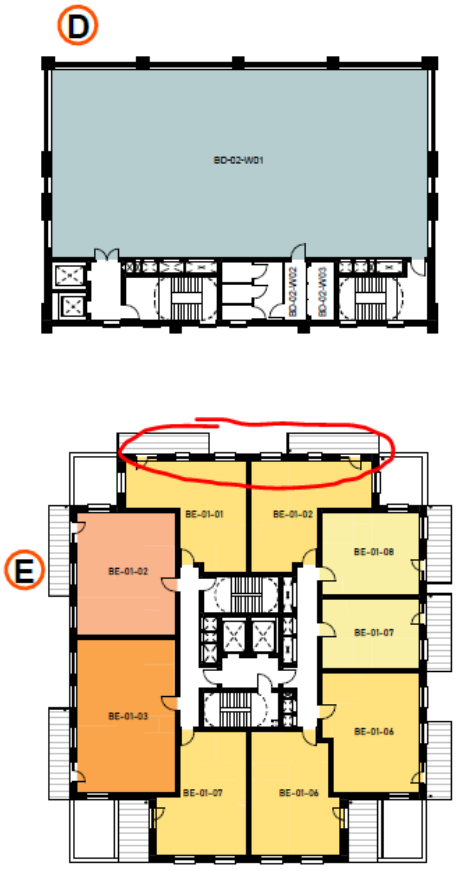
	Single	Enhanced single aspect	Dual aspect	Triple aspect	Total
Studio	4	0	0	0	4
1b1p	77	8	1	0	86
1b2p	120	32	98	4	254
2b3p	27	0	93	2	122
2b4p	16	0	210	2	228
3b5p	0	0	52	8	60
3b6p	0	0	93	2	95
4b6p	0	0	18	0	18
Total	244	40	565	18	867

424. 40 flats would not be in compliance with the GLA definition of dual aspect so have been defined as enhanced single aspect properties. Although these properties are not dual aspect, they would still offer a good level of outlook and would be better than single aspect properties. As referenced in the table above, there would be 40 enhanced single aspect properties, all of which would be private sale.

425. The majority of the proposed single aspect properties would be private sale (231). There would then be 12 social rent and one Intermediate home that would be single aspect. 38 social rent homes and 16 intermediate homes would be dual aspect.

Outlook:

426. There are issues with the outlook to properties within the proposed development such as flats BE-01-01 and BE-01-02 in Block E. These would look immediately out onto the rear elevation of Block D. This relationship is highlighted in the following images with Block D at the top and in Blue and Block E in Yellow and Orange. The following image also highlights the layout and relationship between the northern elevation of Block E and the southern elevation of Block D. For the avoidance of doubt, these would again relate to private sale properties only.



427. There would be a distance of approximately 9.4m between these 2 buildings and the windows to the rear of Block D would be to service spaces such as the stairs or toilets. They could therefore be obscure glazed by an appropriately worded condition as to limit privacy concerns. The proposed siting would however affect the outlook of the new residential flats in Block E and the following image shows what the new residents would have to look out onto:



Image showing the (rear) elevation of Block D.

428. The Urban Greening section of the submitted Design and Access Statement

(DAS) states that the elevation of Block D would be a 'green wall'. This has not however, been highlighted/ shown on the elevational plans. Having a green wall on this elevation would help mitigate a portion of the impact and would help 'soften' the outlook from the adjacent residential windows. This would however need to be conditioned/ referenced in a legal agreement so as to ensure that this would become a green wall.

429. This compromised outlook would relate to 12 flats but these properties would also have a secondary opening on the side elevation. The layout of the affected dwellings is highlighted below:

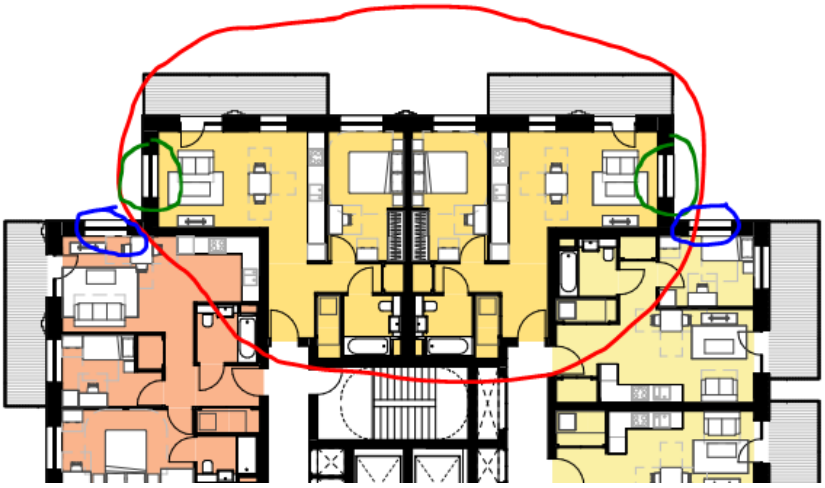


Image showing the affected flats with the openings to the side elevation highlighted in green.

430. For the avoidance of doubt, the relationship between the windows highlighted in green and the adjacent windows highlighted in blue is noted but would not cause harm. A condition could be imposed to ensure that these windows would be at an angle/ potentially obscure glazed which would limit any direct overlooking between the two properties.

431. The compromised outlook of these properties as well as the harm that would be caused to other flats such as those referenced above, is noted. This does however need to be weighed against the site being within an urban location and this space being allocated for housing. The scheme would also bring about benefits that are referenced elsewhere in this report.

432. Further consideration of the outlook and privacy of the proposed dwellings is expanded upon below:

Privacy

433. 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. These distances would prevent unnecessary problems of overlooking/ loss of privacy and disturbance.

434. The distances between the proposed buildings would be below the requirements referenced above. For instance, there would be a distance of approximately 9m between Block H and Block J2. The layout of Block H and Block J2 is shown below with Block H on the left and Block J2 on the right:



435. From the above image, it is evident that there would be direct overlooking between the single aspect property at BH-03-05 (2b3p – private sale) in Block H (left) and BJ2-03-01 (3b5p – private sale) in Block J2 (right). At approximately 9m, the distance between the two properties would be under the recommended 12m and would lead to overlooking/ loss of privacy to both residents. Given the siting and proposed layout of the properties, which include habitable rooms, it would not be reasonable to obscure glaze any of these openings via a condition. It is also worth noting that the relationship referenced above is not limited to just one floor and would affect each of the corresponding flats on the four floors on Block H and Block J2.

436. The limited distance between blocks such as those referenced in the above paragraphs, occurs all over the site such as between Blocks G and K (approximately 8.4m) Blocks F and H (approximately 8.4m) and between Blocks N and M (approximately 10m). There would also be a distance of approximately 8.1m between Blocks Q and Block N.

437. The flats within Block Q and Block N would however, have a different relationship as to that of Block H and J2 shown in the above image. These properties are dual aspect/ triple aspect whilst BH-03-05 (in Block H) is single aspect. There would however still be harm caused by the proposed layout and the siting and location of habitable rooms would again inhibit the use of obscure glazing conditions.

438. The following image shows the distances between the Blocks:



439. Table showing the shortest distances between the windows and blocks:

From Building	To Building	Distance
ABC	D	11.2 m
ABC	E	12.8 m
ABC	F	16.6 m
D	E	9.3 m
D	K	11.9 m
E	F	38.3 m
E	G	12.8 m
F	H	8.5 m
G	H	10.9 m
G	K	8.4 m
H	J	9.0 m
J	K	12.1 m
J	M	15.7 m
J	N	16.2 m
K	L	15.6 m
L	M	11.9 m
M	N	10.0 m

M	P	31.0 m
N	Q	8.1 m
P	Q	13.1 m

440. As shown in the table above there would be a range of separation distances between the new homes, some of which would fall below the 12m recommended in the Residential Design Standards SPD. Whilst this is noted, there is a need to make an efficient use of the site, which is allocated for a significant number of new homes. This issue is therefore considered to be acceptable.

Summary:

441. The harm to the living conditions of the future properties that has been referenced above is noted. It is also understood that there are other examples within the site that have not been specifically referenced that would be affected. It is not considered however, that the impact and level of harm would be so significant that planning permission should have been refused on this basis.

442. The site is within a Major Town Centre and it is an allocated site with an indicative residential capacity of 850 new homes (NSP74). If there were a reduction in the number of residential blocks within the site as to increase the distances between facing windows and to improve the light to properties, then this could reasonably lead to a change in design and a potential increase in height. Furthermore, the impact and the harm that is caused needs to be weighed against the benefits the proposed development would bring, as referenced elsewhere in the report.

Amenity space and children's play-space

443. London Plan D6 requires new homes to have private external amenity space whilst Policy S4 references play and informal recreation space. Southwark Plan policy P15 requires the provision of 10sqm of private amenity space for 3-bedroom units in flatted developments, and states that for smaller units, 10sqm should be provided (at a minimum balcony size of 5sqm to be counted towards communal amenity space).

444. All of the homes would have private amenity space but that 383 of the homes would have outside areas under 10 sqm. No flats that would have less than 5sqm of amenity space. The private amenity space for the social rent flats would range from 10 sqm to 35.1 sqm. For the intermediate flats, the private amenity space would range in size from 5.2 sqm to 12 sqm in size.

445. Any shortfall in amenity space below 10 sqm would need to be re-provided as communal space. It is also noted that each block would be required to provide an additional 50 sqm of communal amenity space.

Amenity space:

446. The proposed development would provide both private and communal amenity

space but there would be compromises on both. An example being that 383 residential properties would have a private amenity space measuring under 10sqm. The smallest of the amenity spaces would measure 5sqm which is under that required by Policy P15.

447. This shortfall in amenity space would need to be made up within communal provision and this along with the required 50 sqm per block, would be located in the following areas (highlighted in pink)



	Site Boundary - Total Area:	**26,987 sqm**
	Public Open Space	**10,240 sqm**
	Private Residential Amenity Space	**404 sqm**
	Communal Residential Amenity Space	**3,954 sqm**
	- Podium level above the supermarket	1,793 sqm
	- Podium level of buildings G & K	480 sqm
	- Roof level of Block A	369 sqm
	- Roof level of Block K	208 sqm
	- Roof level of Block G	104 sqm
	- Roof level of Block L	429 sqm
	- Roof level of Block M	308 sqm
	- Roof level of Block N	263 sqm
	Communal Workspace Amenity Space	**279 sqm**
	- Roof of Block D	

Note:
The figure above do not include proposed play areas.
The private residential amenity figure does not included areas of balconies.

448. The image above shows the location of the communal amenity space. The podium level above the supermarket that contains both communal amenity and play space has also not been ‘double counted’. At approximately 3,094 sqm, this space is large enough to accommodate both the proposed amenity and play space.

449. As highlighted in the table above, the total communal amenity space that is required (which includes the shortfall in private space and the 50 sqm per block), would be 2217.7 sqm. The development as a whole, would provide a total amenity space of 3954 sqm. The proposed development would therefore provide 1736.3 sqm of amenity space above and beyond the minimum requirement (2217.7 sqm).

450. During the course of the application, amended plans were received which altered balconies on the eastern part of Block P. These balconies would have (previously) projected beyond the red line of the site and were amended so that they would now be located within the red line. This has meant a decrease in depth of part of the balcony and that an area would be below the required 1.5m (in depth) though with the shape of the balcony altered , much of the width would be more than 1.5m. Part of the balcony would be approximately 1.4m in depth which is only slightly below the policy requirement.

451. The area that is below 1.5m in depth has not been included in the amenity calculation and to ensure compliance, the width of these balconies was increased. This would ensure that these areas would still provide 10sqm of private amenity space as required by Policy P15.

Usability of communal amenity space:

452. As referenced above and for blocks of flats, the Southwark Plan requires an additional 50sqm of communal amenity space to be provided per block and the proposed development would (generally) provide this additional space within the blocks. For instance, Blocks G and K would share communal space as would Blocks L to Q. It is noted that blocks E, F, H and J would not have access to any communal amenity space located within their block but all residential properties (irrespective of tenure) would have access to the large amenity space located in the podium of Block L to Q. This would be accessed via the concierge on Block M.

453. The private blocks that would not provide any communal amenity space, would meet the required private amenity space for each individual dwelling. Block E for instance (given the number of flats), would require 790sqm of private amenity space but would provide 952.7sqm of private amenity space. The same would be applicable for Blocks F (requires 200sqm, provides 200sqm) and Block H (requires 430 sqm but provides 470 sqm). The individual flats in these blocks would be in compliance with the minimum 10 sqm requirement for private amenity space.

454. The supporting information submitted as part of the application has referenced the London Charter and confirmed that the amenity spaces located on the ground floor would be available to the public. The submitted information also confirmed that the public areas (on the ground floor), would have unrestricted access. It is therefore deemed to be in general compliance with the criteria as set out in the London Charter and to ensure compliance, these could be addressed via the legal agreement. (S106).

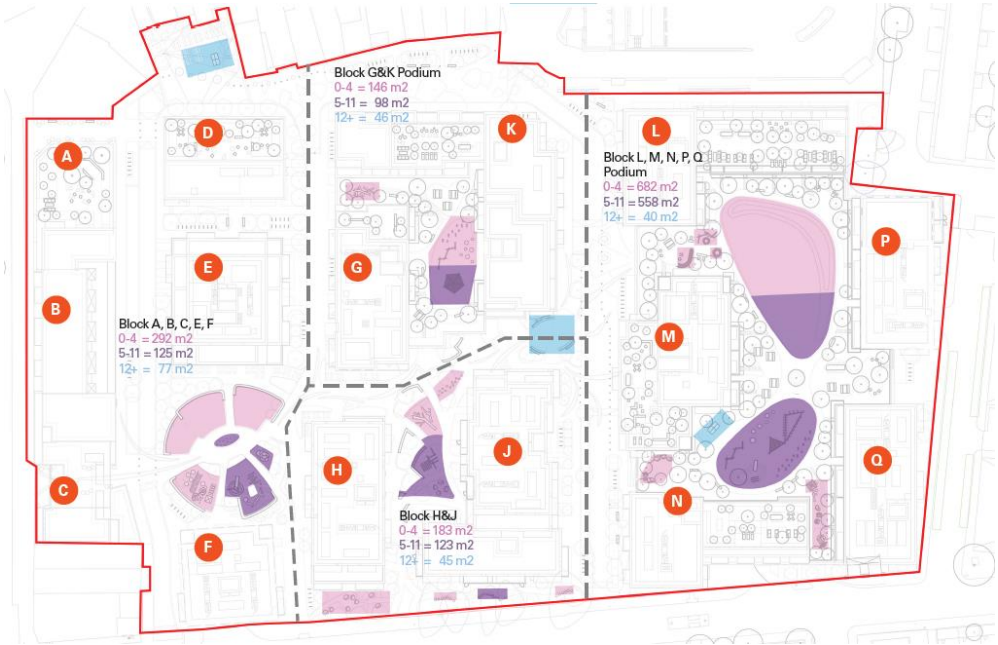
455. Given the above, it is considered that the proposed development would provide a good level of both private and communal amenity space for the future occupiers.

Play-space:

456. The scheme would provide all age ranges of play space within the site and would provide a total provision of 2417 sqm. Given the overall scale of the site, this has been broken down into corresponding blocks and this is visible in the following image and table. For the avoidance of doubt, Block D would be commercial.

Block	Location	0-4 requirement (sqm)	0-4 provision (sqm)	5-11 requirement (sqm)	5-11 provision (sqm)	12+ requirement (sqm	12+ provision (sqm)	Total requirement (sqm)	Total play provision (sqm)
A,B,C, D,E,F	Aylesham Gardens	111	292	75	125	31	77		
G,K	G&K podium	107	146	75	98	38	46		
H,J	Woodland Walk	130	183	93	123	47	47		
L,M,N, P,Q	L,M,N, P,Q podium	585	682	498	558	442	40		
Total		942	1303	741	904	558	210	2241	2417

Location and different age ranges of the proposed play space



457. The proposed play space would be positioned in various locations around the site and these would either be located at ground level or within the podiums. The proposed blocks would also be in close proximity to an area of play space. For instance, Block A, B and C being close to Aylesham Gardens and there being a play area in-between Block H and J.

458. There would be no play space located on the upper floors of the buildings. Confirmation has also been received that all tenants, irrespective of what block they reside, would have access to the play areas on the podium for Blocks L-Q. This would be accessible through the concierge for Block M.

459. The scheme would be in compliance with the required amount of playspace for the 0-4 and 5-11 age groups. The proposal would provide 210 sqm of 12+ play space but this would be 348 sqm under the minimum requirement of 558 sqm and would need to be provided off-site. The above image has shown that 77 sqm of 12+ playspace would be located in Peckham Yards but the DAS advises that this would be a ‘vibrant and fun social space’ and that it would contain seating and landscaped elements. It also confirms that this space would be utilised as a night-time space and attraction. This therefore raises questions about the actual usability (of this space) as a 12+ play area. If this is not counted (in the 12+ figure), it would mean that additional shortfall would need to be provided off-site.

460. The shortfall of 12+ play space, including the possible shortfall such as at Peckham Yards, could be addressed through a financial contribution referenced in a s106 legal agreement. This contribution could potentially fund improvements to nearby parks including Bells Gardens, Warwick Gardens, and Cossall Park which could mitigate the shortfall of this type of playspace being provided on-site.

461. The designers of the proposed play areas have considered the requirement to be inclusive and accessible to children of all ages and with a wide range of abilities. This is a supported approach, however, more details are required and so a ‘Play Strategy’ could be required and addressed via a condition.

<u>Proposed Aylesham Gardens</u>



462. The council's Public Health Department have drawn attention to the large play area above block M and how this should not be a sculpted lawn and should instead be activated for sports opportunities. This change could bring about a level of concern with regards noise and could impact upon issues such as UGF. This is therefore noted but would not be considered feasible. but this could be acceptable but further details would be required.

463. As such, specifics of the proposed play space and how this could be used could be via condition and with this in place, as well as a Section 106 obligation concerning 12+ play, the scheme would have an acceptable impact in terms of the provision of playspace.

Overshadowing of amenity space

464. 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.
A total of 16 areas of external amenity were tested within the scheme for both March 21st and June 21st supplementary testing times. For March, 10 of the areas assessed would achieve adequate direct sunlight, including the main area of public open space at Aylsham Gardens. On June 21st, all but 1 (one) space would experience direct sunlight. These results are highlighted in the following images:

Image below showing the results for June 21st



Image below showing the results for March 21st.



465. One of the areas that would fail on March 21st, would be the amenity and play areas between Blocks G and K. This space would receive limited sunlight (in March). 7 % of Peckham Yards would receive 2 hours of sunlight on 21 March.. These figures do increase in June with Blocks G and K increasing to 31% and the area to Peckham Yards to 80%. Receiving 31% for Blocks G and K would still cause a level of harm but they would receive a better level of sun in the summer months.

466. In reference to the other areas and as shown in the above images, 64% of Aylesham Gardens (between blocks E and F) would receive two hours of sunlight on 21 March This is the main amenity space for the development and would incorporate lawn, water and play areas. This would provide a good, usable and within the summer, a well-lit space.

467. Given the density and heights of buildings, areas within the site would receive varying degrees of sunlight. With conditions to improve the visual appearance and usability of the external amenity spaces, the development would have an acceptable impact in terms of overshadowing.

Secure by Design

468. Policy D11 of the London Plan and policy P16 of the Southwark Plan require development proposals to reduce opportunities for crime and create and maintain

safe internal and external environments. The applicant's EQIA advises that crime and antisocial behaviour have been highlighted as a key local concern for residents and visitors to the site, including those accessing the Bus Station at night.

469. The Metropolitan Police Designing out Crime officer has confirmed that the proposed development has considered opportunity for natural surveillance. That it would incorporate excellent lines of site and that these are excellent crime prevention measures. They also confirmed that the ground floor footprint has been designed in such a way that there are no alcoves or secluded areas that are often associated with crime and are ASB generators.

470. Reference was made to items such as internal access but this can be controlled by installing a smart lift and gates creating a secure lift and stair core on each floor. There was also references to planting and site lines as well as graffiti and how this area suffers from this as well as tagging. A landscaping and graffiti/ tagging prevention/ maintenance condition could therefore be imposed as to mitigate this.

471. The response from the Designing out Crime Officer concluded stating that they are confident that the scheme would be able to achieve certification but to ensure that this is achieved, a two-part 'Secured by Design' condition has been imposed. Of note is that some of the representations in support of the application consider that the proposed development would improve safety and security around the site.

472. CCTV - Officers have consulted the council's CCTV Team regarding the application, and the team has advised that the proposed development would compromise the existing radio network link between CCTV cameras.

473. In addition to the above, constructing buildings of the proposed height could harmfully impact future expansion of the CCTV network. For instance, this could reasonably prohibit the increase of CCTV in an area and given the increase in footfall (to the area and bus station) that would be associated with the proposed development, it is likely that additional CCTV would be required.

474. To mitigate the issues referenced above, a financial contribution would be required. An area of the roof has also been requested so as to allow for the potential to house equipment in the future. With these in place, the scheme would have an acceptable impact with regards CCTV.

475. Whilst it is recognised that there are some areas where the proposed new homes would not fully comply with the council's Residential Design Standards SPD, there is a need to make an efficient use of the land, and the site is allocated for a significant number of new homes. In spite of the identified shortcomings in certain areas, overall it is considered that the proposed development would provide a high standard of accommodation for future occupiers.

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

476. 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. Amenity concerns have been raised by neighbouring residents, including loss of light, overshadowing and loss of privacy.

477. A development of the size and scale proposed would clearly have potential significant impacts on the amenities and quality of life of occupiers of properties both adjoining and in the vicinity of the site. The proposal has required an EIA in order to ascertain the likely associated environmental impacts and how these can be mitigated. The accompanying Environmental Statement deals with the substantive environmental issues. An assessment then needs to be made as to whether the residual impacts, following mitigation, would amount to such significant harm as to justify the refusal of planning permission.

Demolition and construction

478. The effects of demolition and construction are considered throughout the ES in relation to the various topics including noise, vibration and air quality, and are considered in the relevant sections of this report.

479. Impact of the proposed uses – Policy GG2 of the London Plan relates to making the best use of land, in order to create successful, sustainable, mixed-use places. Policy P18 of the Southwark Plan 'Efficient use of land' is also relevant, which states that development will be permitted which optimises land use, does not unreasonably compromise the development potential or legitimate activities on neighbouring sites, and provides adequate servicing facilities, circulation space and access to, from and through the site.

480. It is not considered that the proposal would hinder the operation of any of the neighbouring uses, including the existing shops, services and community facilities on Rye Lane. As set out in the transport section of this report, two hours free parking would be provided within the supermarket car park, which would not be restricted to those using the supermarket.

481. The site is located in Peckham Town Centre and accommodates a range of retail uses within a 1980s shopping centre, including a large supermarket, a large surface level carpark, and petrol station. With the exception of the proposed workspace and the new homes, the range of uses proposed would be similar to those which currently exist on the site, and it is not considered that they would result in any significant loss of amenity to neighbouring properties. Conditions could be used to mitigate any potential impacts arising from hours of use, plant

noise, and odours from cooking activities.

482. The existing supermarket is on the western part of the site, close to the retail activity on Rye Lane. The servicing hours are not known, and servicing takes place from an external yard. The proposed supermarket would be located on the eastern part of the site, much closer to homes on McKerrell Road and Hanover Park and given the new location, if planning permission is granted on appeal officers would seek to restrict the servicing hours to limit any loss of amenity to the neighbouring homes. It is noted however, that there are already a high number of busses travelling along Hanover Park each day.

483. It is not considered that the proposed workspace within block D would cause any significant loss of amenity to neighbouring occupies. The application documents set out that this is expected to be used as co-working space and maker space, and it is not considered that this would result in any significant noise or disturbance; if permission is granted on appeal, officers would recommend limiting the hours that the terrace can be used.

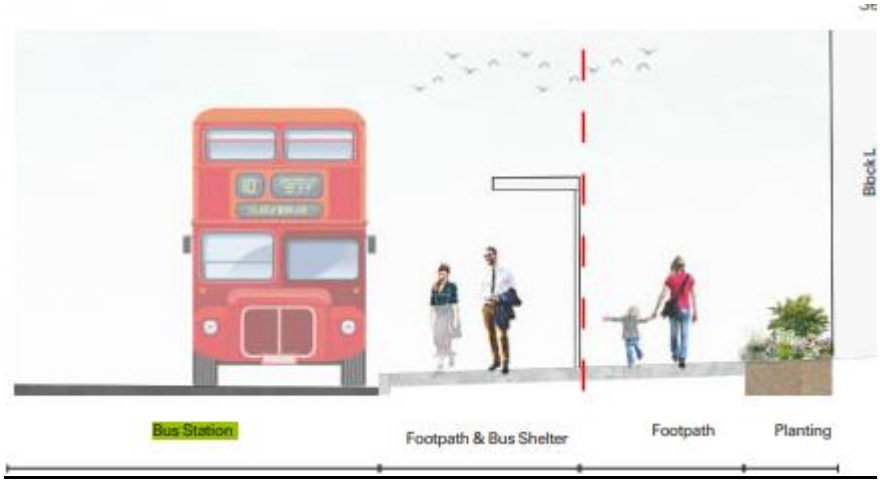
Agent of change

484. Policy D13 of the London Plan 'Agent of change' places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. It requires development to be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them.

485. The proposed development would introduce a significant number of new homes in close proximity to the existing bus station, which raises the potential for noise and air quality complaints against the bus station operator (TfL). The closest relationship would be with proposed block L, which would be located approximately 3m from the boundary with the bus station which is demarked by a brick boundary wall with railings on top (approximately 2m high in total). There are bus stops very close to where block L would be located.

486. The applicant has sought to address this by providing deck access to floors 02-04 in block L, with the balconies and main living spaces on these levels facing south over the communal garden; balconies facing the bus station would only begin on floor 05-08, when they would be well above the level of the bus station. This, together with the move towards electric vehicles which are generally quieter, is considered to be sufficient to minimise the likelihood of noise complaints. Air quality has been considered separately later in the report, and the use of electric vehicles has a positive impact upon air quality.

Proposed section between block L and the bus station



487. In May 2024 planning permission was granted for change of use of the adjoining Jones and Higgins clocktower building to a mixed-use nightclub, live music venue and drinking establishment with expanded food provision (reference: 23/AP/2878);the retail use on the ground floor are to be retained It is understood that the applicant owns the freehold of this building which has been outlined in blue on the site location plan, together with another of other buildings on Peckham High Street which adjoin the site.

488. Planning permission 23/AP/2878 is subject to a number of conditions relating to sound-proofing, and the accompanying officer report highlighted the need to ensure that potential new homes coming forward on site allocation NSP74 were not adversely affected by noise and disturbance. A number of conditions for the nightclub permission have been discharged, and it is understood that the venue will open in October this year. Subject to appropriate sound-proofing of the nightclub, the new homes should not compromise the ability of the nightclub to operate.

Daylight, sunlight and overshadowing

489. Section 11 of the NPPF relates to making effective use of land. Paragraph 124 requires planning policies and decisions to promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. 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).

490. Policy D9 (d) of the London Plan 'Housing quality and standards' states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space. Policy D9 of the London plan relates to tall buildings, and states that daylight and sunlight conditions around the proposed tall building(s) and neighbourhood must be carefully considered.

491. Many of the objection letters received raise concerns regarding loss of daylight, sunlight and overshadowing, including overshadowing of neighbouring solar panels. Southwark Law Centre has raised concerns that some council-owned homes would experience significant daylight and sunlight impacts, potentially impacting upon lower income households. Daylight, sunlight and overshadowing effects are considered within chapter 10 of the ES, and LUC has commented on the categorisation of some of the impacts, and these are considered in the relevant sections of the report.

Demolition and construction

492. The ES advises that daylight, sunlight and overshadowing effects have not been modelled during demolition and construction because they would be constantly changing, including impacts from cranes, scaffolding and hoarding. Officers concur with this approach and consider that it is acceptable.

Completed development

493. Chapter 10 of the ES sets out that the following tests have been undertaken based on the 2022 Building Research Establishment (BRE) guidance 'Site layout planning for daylight and sunlight':

494. Vertical Sky Component (VSC) is the amount of skylight reaching a window expressed as a percentage. The guidance recommends that the windows of neighbouring properties achieve a VSC of at least 27%, and notes that if the VSC is reduced to no less than 0.8 times its former value (i.e. 20% reduction) following the construction of a development, then the reduction will not be noticeable.

495. No-Sky Line (NSL) is the area of a room at desk height that can see the sky. The guidance suggests that the NSL should not be reduced to less than 0.8 times its former value (i.e. no more than a 20% reduction). This is also known as daylight distribution.

496. Sunlight - Annual Probable Sunlight Hours (APSH). This should be considered for all windows facing within 90 degrees of due south (windows outside of this orientation do not receive direct sunlight in the UK). The guidance advises that windows should receive at least 25% APSH, with 5% of this total being enjoyed during the winter months. If a window receives less than 25% of the APSH or less than 5% of the APSH during winter, and is reduced to less than 0.8 times its former value during either period and has a reduction in sunlight received over the whole year of greater than 4%, then sunlight to the building may be adversely affected.

497. Overshadowing - 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 sunlight is reduced by more than 20% it is considered that the change may be noticeable.

498. The ES categorises the daylight, sunlight and overshadowing impacts as follows:

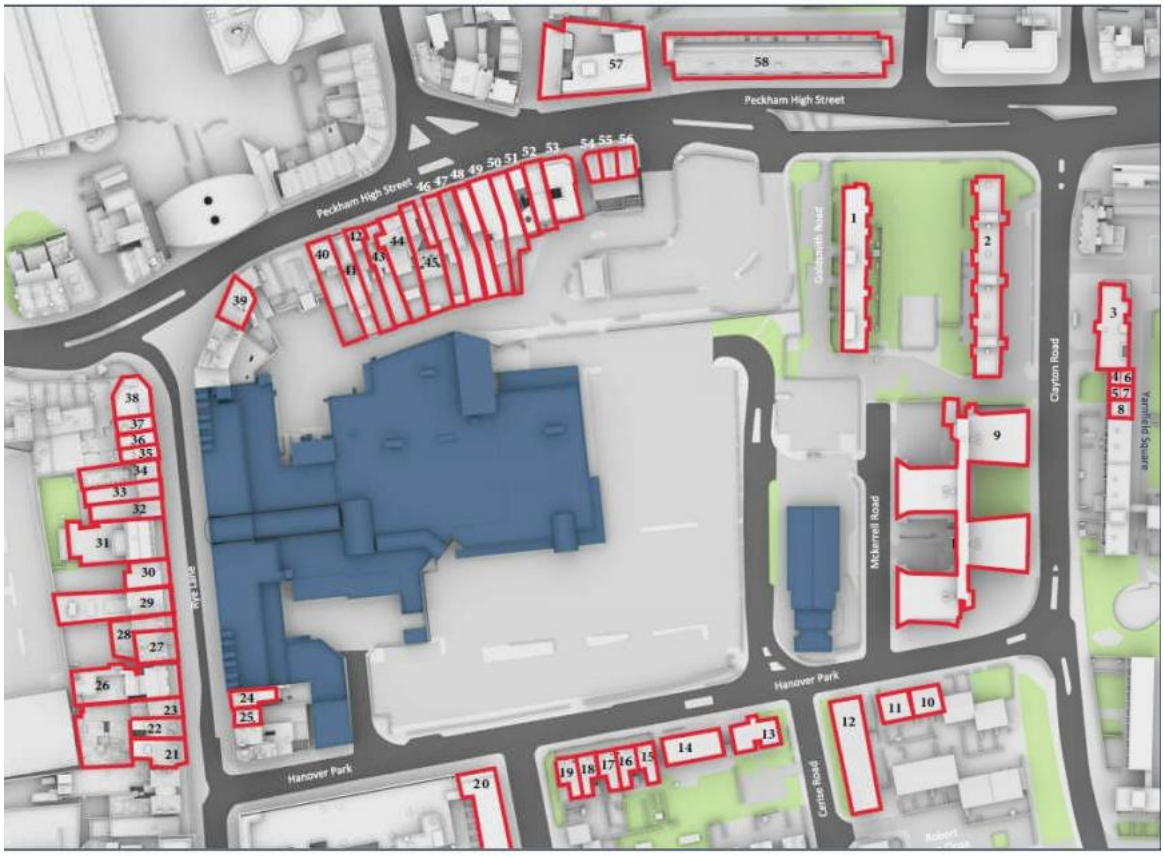
Magnitude of Impact	Daylight criteria
Negligible	0 –20% reduction
Low (minor adverse)	20-30% reduction
Medium (moderate adverse)	30-40% reduction
High (major adverse)	40%+ reduction

499. The following properties have been assessed for daylight and sunlight:

- Purdon House, Goldsmith Road
- Flamborough House, Clayton Road
- Parish Apartments
- 35, 36, 44, 45 and 46 Yarnfield Square
- 14-16, 20, 22, 24, 26, 28, 30-36, 40, 44, 46 and 81 Hannover Park
- 11-12 Robert Keen Close
- 2, 4, 6, 8-10, 12-12A, 14-16, 18, 18A, 18B, 20, 22, 22A, 24, 43 and 45 Rye Lane
- 1-2, 3, 4 and 5 Central Buildings
- 74, 86, 88, 90, 92, 96, 98, 102, 104, 106, 108, 110, 112, 114, 116, 118, 120, 122, 121-125 (excluding 122) Peckham High Street
- Dunstall House

Location of properties tested for daylight and sunlight

500.



501. In summary, of the 905 windows tested for VSC 495 (55%) would comply with

the BRE guidance and as such would experience negligible effects, and 102 (11% would experience minor adverse effects therefore in total, 66% of the windows tested would experience negligible or minor adverse effects. Of the remaining windows, 89 (10%) would experience moderate adverse effects and 219 (24%) would experience major adverse effects.

502. For NSL of the 964 rooms tested, 549 (79%) would comply with the BRE guidance and as such would experience negligible effects and 35 (5%) would experience minor adverse effects therefore in total, 84% of the rooms would experience negligible or minor adverse effects. Of the remaining rooms, 26 (4%) would experience moderate adverse effects and 84 (12%) would experience major adverse effects.

503. For APSH of the 302 rooms tested, 276 (91%) would comply with the BRE guidance and as such would experience negligible effects and two (0.6%) would experience minor adverse effects. Of the remaining rooms one (0.3%) would experience a moderate adverse effect and 23 (7.6%) would experience major adverse effects.

Daylight

504. The impacts upon the following properties would comply with the BRE guidance for VSC and NSL:

- Parish Apartments;
- 35, 36, 44, 45 and 46 Yarnfield Square
- 22, 22A and 24 Rye Lane
- 1-2 Central Buildings
- 121-125 Peckham High Street

Existing and proposed VSC

Road name	No of windows tested	BRE compliant	20-30% reduction	30-40% reduction	40+ reduction	Retained VSC range for 40%+ reduction
Purdon House	47	18	13	6	10	
Flamborough House	80	60	16	4	0	
Hanover	351	151	29	24	147	

Park (nos 14-16, 20-36, 40, 44, 46, 81)						
10-12 Robert Keen Close	8	2	4	0	2	
Rye Lane (2, 4, 6, 8-10, 12-12a, 14-16,18, 18a, 18b, 20, 22, 22a, 24, 43, 45)	112	47	8	12	45	
Central buildings (1-2, 3, 4, 5)	32	18	4	4	6	
Peckham High Street (74, 86, 88, 90, 92, 96, 98, 102-122 (evens), 121-125)	138	75	18	37	8	
Dunstall House	107	95	8	4	0	

Existing and proposed NSL

Road name	**No of rooms tested**	**BRE compliant**	**20-30% reduction**	**30-40% reduction**	**40+ reduction**
Purdon	47	47	0	0	0

House					
Flamborough House	80	80	0	0	0
Hanover Park (nos 14-16, 20-36, 40, 44, 46, 81)	274	206	10	15	43
11-12 Robert Keen Close	6	6	0	0	0
Rye Lane (2, 4, 6, 8-10, 12-12a, 14-16,18, 18a, 18b, 20, 22, 22a, 24, 43, 45)	64	22	6	6	30
Central buildings (1-2, 3, 4, 5)	13	13	0	0	0
Peckham High Street (74, 86, 88, 90, 92, 96, 98, 102-122 (evens), 121-125 - hotel)	106	72	18	8	8
Dunstall House	76	73	3	0	0

The buildings listed below would not comply with the BRE guidance in relation to VSC, but would comply in relation to NSL:

Purdon House;
Flamborough House
11-12 Robert Keen Close
20, 22, 22a, 24 Rye Lane
1-2 and 3 Central Buildings
74, 96, 120, 122 and 121-125 Peckham High Street

505. Purdon House – This six-storey block of flats is located to the north-east of the site, within the Clifton Estate. Of the 47 windows tested for VSC, 18 (38.2%) would comply with the BRE guidance, 13 windows would experience a minor adverse effect, six would experience a moderate adverse effect, and ten would experiencing a major adverse effect. Southwark Law Centre has commented on the impact to this building, and that it may impact people from lower socio-economic groups given that it is a council-owned block.

506. For the windows experiencing moderate and major effects the VSC reductions would range from 31.27% to 55.57%, with retained VSCs ranging from 9.36% to 20.34%, affecting bedrooms and kitchens. All of the rooms tested would comply with the BRE guidance for NSL. The ES concludes that the impact upon this building would be moderate adverse and significant. However, given that impacts to all of the rooms would comply in relation to NSL, this impact is considered to be acceptable. The most affected windows and rooms sit behind the access deck and ES includes a test with the this deck removed; in this condition, the VSC compliance rate would increase to 74.4% which shows that the impacts can partly be attributed to the restriction the deck has on light to the building.

507. Flamborough House, Clayton Road - This five-storey block of flats sits behind Purdon House. Of the 80 windows tested for VSC, 60 (75%%) would comply with the BRE guidance, 16 would experience a minor adverse effect, and four would experience a moderate adverse effect. For the windows experiencing moderate adverse effects the VSC reductions would range from 30.87% to 36.16% and the retained VSCs would range from 14.63% to 21.33% (affecting lounge / diners and bedrooms). The impacts upon all of the rooms would comply with the BRE guidance in relation to NSL. The ES categorises the overall impact upon this building as moderate adverse and significant. However, given that the impacts upon all of the rooms would comply in relation to NSL, officers consider that this impact would be acceptable. With the existing balconies removed assessment, the VSC compliance rate would increase to 83%.

508. 11-12 Robert Keen Close - These are two-storey houses to the south of the site, the flank elevations of which face Hanover. Of the eight windows tested, two (25%) would comply with the BRE guidance, four would experience moderate adverse effects and two would experience major adverse effects, both within number 12 at ground and first floor level. The major adverse effects would be VSC reductions of 50.06% and 46.40 %, and their retained VSCs would be 17.27% and 19.28%. Whilst the use of the rooms is not known, the windows

appear to be secondary. They currently have high VSCs of 34.58% and 35.97% owing to their location opposite the existing low-rise petrol station. All of the rooms tested would comply with the BRE guidance in relation to NSL. The overall effect is considered in the ES as being moderate adverse and significant. However, for the reasons outlined above, officers consider that this impact would be acceptable.

509. Hanover Park - With the exception of number 81 which is considered in detail below, these properties sit on the southern side of the street and are three-storeys high. A total of 351 windows across 274 rooms have been assessed on this street. For VSC, 151 windows (43%) would comply with the BRE guidance which would be in 14-16 and 81 Hanover Park; 29 windows would experience minor adverse effects, 24 would experience moderate adverse effects and 147 would experience major adverse effects. The windows experiencing moderate and major adverse effects would have VSC reductions ranging from 33.10% to 69.65% and retained VSCs ranging from 2.27% to 22.09%.

510. For NSL, 206 of the rooms tested would comply with the BRE guidance (75%), ten would experience minor adverse effects, 15 would experience moderate adverse effects and 43 would experience major adverse effects. The rooms experiencing moderate and major adverse effects would have NSL reductions ranging from 30.7% to 66.8%. Where the room uses are known, this affects bedrooms and reception rooms. The ES concludes that the impacts upon the properties on Hanover Park would range from minor adverse and not significant and moderate to major adverse and significant.

511. 81 Hanover Park is a large 5-7-storey building which sits between Clayton Road and McKerrell Road. It is understood to be owned by housing association and mainly provides key worker housing; it contains 172 homes including 76 x 2 and 3 bedroom homes and 96 studios. The building has two projecting wings fronting McKerrell Road which extend right to the back edge of the pavement. Some of the flats currently look out onto the low-rise petrol station and as such receive very high levels of daylight, with VSCs in the mid to late 30s (up to 39%). Whilst some of the flats have balconies, daylight levels have been tested with the balconies removed but it has very little effect in this instance, indicating that the impacts to this building would mainly arise from the proposed development.

512. Of the 252 windows tested 136 (54%) would comply with the BRE guidance for VSC, 164 would experience minor adverse effects, 17 would experience moderate adverse effects and 71 would experience major adverse effects. The moderate adverse effects would be VSC reductions ranging from 30.05% to 39.85%, with retained VSCs ranging from 6.69% to 25.27%. For the major adverse effects the VSC reductions would range from 41.18% to 90.98%, with the retained VSCs ranging from 2.27% to 21.92%. The window experiencing a 90.98% VSC reduction would see its retained VSC change from 25.17% to 2.27%. This window (reference W10/370) is at ground floor level fronting McKerrell Road, and has a projecting balcony directly above it.

513. For NSL of the 208 rooms tested, 176 (84.6%) would comply with the BRE guidance, ten would experience moderate adverse effects and 15 would

experience major adverse impacts, with the reductions ranging from 30.7% to 65.9%. The overall conclusion of the ES is that the daylight impacts to this building would be major adverse and significant.

514. Rye Lane – All but two of the buildings tested on Rye Lane are located on the western side of the street, opposite the site. The remaining two adjoin the site to the south. All of the buildings are in retail or commercial use at ground floor level with flats above, and are 3-4 storeys high.

515. A total of 112 windows across 64 rooms have been assessed on this street. For VSC, 47 windows (41.9%) would comply with the BRE guidance, eight windows would experience minor adverse effects, 12 would experience moderate adverse effects and 45 would experience major adverse effects. The windows experiencing moderate and major adverse effects would have VSC reductions ranging from 38.10% to 58.01% and retained VSCs ranging from 12.7% to 26.19%. One exception to this is at 8-10 Rye Lane where one window would experience a 99.01% reduction in VSC (0.13% retained), although the room is also served by two other windows which would have retained VSCs of 11.49% and 15.05%; the use of this room use is not known.

516. For NSL of the 64 rooms tested, 22 would comply with the BRE guidance (34%), six would experience minor adverse effects, six would experience moderate adverse effects and 30 would experience major adverse effects. The rooms experiencing moderate and major adverse effects would have NSL reductions ranging from 32.4% to 77.9%. Where the room uses are known this affects studio flats, bedrooms and an open plan kitchen / living / dining space. The ES concludes that the daylight impacts upon numbers 12-12A, 14-16, 18, 18A, 18B, 20, 38 and 45 would be minor adverse and not significant, largely on account of quite high retained VSCs. The impacts upon the remaining buildings is categorised as major adverse and significant.

517. Of note is that LUC in its review of the ES does not agree with the ES categorisations of impacts to 12-12a, 14-16 and 18a and b Rye Lane. The ES reports the impacts to these properties as minor adverse whereas LUC considers that the impacts to 12-12a and 18a and b Rye Lane would be moderate adverse and the impact upon 14-16 Rye Lane would be major adverse. Having reviewed the detailed results, officers agree with the LUC categorisation, and note the moderate and major adverse effects which would occur.

518. Central Buildings - This is a 3-storey building located at the northern end of Rye Lane, at the junction with Peckham High Street; it contains commercial space on the ground floor and residential above.

519. At 3 Central Buildings all four windows tested for VSC would experience moderate adverse effects, with reductions ranging from 21.76% to 27.65% and retained VSCs ranging from 20.68% to 22.74% which would be quite high for a dense urban area. Both rooms tested would comply with the BRE guidance for NSL. The ES categorises this effect as minor adverse and not significant.

520. At 4 Central Buildings all four windows tested for VSC would experience moderate adverse effects with reductions ranging from 31.61% to 37.18% and retained VSCs ranging from 18.49% to 20.51% which would be quite high for a dense urban area. For NSL, one room would experience a moderate adverse effect with a 36.8% reduction and the other would experience a major adverse effect, with a 42.2% reduction. The overall effect is categorised as minor adverse and not significant within the ES.

521. LUC considers that the impact to this building would be moderate adverse given the reductions in NSL. This has been noted, but officers consider that the retained VSC levels would such that the impact upon this building would not be significant.

522. At 5 Central Buildings all six windows tested for VSC would experience major adverse effects, with reductions ranging from 45.50% to 48.63% and retained VSCs ranging from 12.73% to 16.71%. For NSL both rooms tested would experience major adverse effects, with reductions of 40% and 42.6% (room uses unknown). The ES categorises the overall effect to this building as major adverse and significant.

Peckham High Street

523. Most of the properties along this street which have been tested are located on the southern side of the street, and are 3-4 storeys high with commercial space on the ground floor and residential above. 121-125 Peckham High Street has been tested which is a five-storey building on the northern side of the street which is in use as a Travel Lodge hotel. Whilst the BRE guidance is generally for existing and new homes, it states that it may also be applied to any existing non-domestic building where the occupants have a reasonable expectation of daylight, including hotels. However, in this instance less weight would be given to impacts upon hotel accommodation given that it is only for short-stay accommodation.

524. Excluding the hotel which is considered separately later in the report, a total of 105 windows across 78 rooms have been assessed on this street. For VSC the impact upon 42 windows would comply with the BRE guidance (40%), 18 would experience minor adverse effects, 37 would experience moderate adverse effects and eight would experience major adverse effects. The windows experiencing moderate and major adverse effects would have VSC reductions ranging from 30.24% to 72.82% and retained VSCs ranging from 4.02% to 26.09% (the lowest retained VSCs would be at 112 and 116 Peckham High Street, including one bedroom).

525. For NSL of the 78 rooms tested 44 would comply with the BRE guidance (56.4%), 18 would experience minor adverse effects, eight would experience moderate adverse effects and eight would experience major adverse effects. The rooms experiencing moderate and major adverse effects would see NSL reductions ranging from 30.1% to 50.9%. The ES categorises the daylight impacts upon all but two of the buildings on this street which were tested as

minor adverse and not significant. The remaining two are at 108 and 112 Peckham High Street and the impacts are categorised as moderate adverse and significant.

526. LUC considers that the impacts upon 98, 104, 106, 108, 110 and 112 Peckham High Street would be one category worse than set out in the ES, including major adverse effects at 108 and 112 Peckham High Street. Having reviewed the detailed results officers agree with the LUC categorisations in the main, except for 112 Peckham High Street where officers agree with the ES categorisation of moderate adverse effects. This is because the majority of the windows tested would comply in relation to VSC, and for NSL, of the four rooms tested one would comply with the BRE guidance, two would experience minor adverse effects and one would experience a moderate adverse effect.

527. Travel Lodge hotel, 121-125 Peckham High Street- all 33 windows tested would comply with the BRE guidance in relation to VSC and all 28 rooms would comply in relation to NSL. The ES categorises the daylight effects on this building as negligible and not significant and officers concur with this assessment.

528. Dunstall House (127-149 Peckham High Street – This five-storey building is located on the northern side of Peckham High Street and contains commercial uses on the ground floor and flats above. Of the 107 windows tested for VSC, 95 would comply with the BRE guidance (88.7%); eight would experience minor adverse effects and four would experience moderate adverse effects with VSC reductions ranging from 30.09% to 33.11% and retained VSCs ranging from 9.13% to 10.92% . For NSL, 73 of the 76 rooms tested would comply with the BRE guidance and three would experience minor adverse effects. The overall effect is categorised in the ES as minor adverse and not significant and officers concur with this assessment.

529. Based on the above the ES concludes that there would be significant adverse effects on daylight to a number of homes close to the site. These major adverse effects are duly noted, and are in part owing to the low-rise nature of the existing buildings and large expanse of surface level carpark which are present on the site. Many of the neighbouring properties therefore have high existing VSCs of between 30-39% and would be disproportionately affected by increased massing on the site. Also of note is that the site is allocated for a significant number of new homes in the Southwark Plan, and site allocation NSP74 sets out that this could include development of up to 20-storeys.

530. In recognition of the above officers agreed with the appellant during pre-application discussions that an alternative VSC target value of 15% would be acceptable in this instance, rather than the 27% recommended in the BRE guidance. The BRE guidance itself sets out that it should be applied flexibly, and appendix F of the guidance sets out the rationale for using alternative target values, based on the particular circumstances of a site. Paragraph 130c of the NPPF also endorses this approach, and states that local planning authorities should refuse applications which they consider fail to make efficient use of land,

taking into account the policies in NPPF. In this context, 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).

531. The appellant has sought to justify the 15% alternative target value based on a number of appeal decisions across London where VSCs within the mid-teens have been accepted. The appellant has also referred to a number of schemes in Southwark where similar retained VSCs have been accepted, including Ruby Triangle and Borough Triangle. If this alternative VSC value of 15% is used, then the overall compliance rate would increase from 55% to 77%, with 700 windows retaining a VSC of at least 15%.

Sunlight

532. A total of 302 rooms across 26 properties have been tested for sunlight, and of these 276 (91%) would comply with the BRE guidance for APSH, including at the following properties:

Purdon House
45 and 46 Yarnfield Square
10-12 Robert Keen Close
18A and 18B Rye Lane
74, 86, 88, 90, 92, 96, 98, 104, 104, 106, 108, 110, 118, 120, 122 and 121-125 Peckham High Street

533. Properties where the impacts would not fully comply with the BRE guidance:

Property	No. of rooms	BRE compliant	Non-Compliant					
			Winter APSH			Total APSH		
			20-30% Loss	30-40% Loss	>40% Loss	20-30% Loss	30-40% Loss	>40% Loss
81 Hanover Park	112	93	0	1	18	8	1	8
102 Peckham High Street	2	0	0	0	2	1	0	0
112 Peckham High Street	4	3	0	0	1	0	0	1

114 Peckham High Street	6	5	0	0	1	0	1	0
116 Peckham High Street	6	5	0	0	1	0	0	1
Dunstall House	76	74	2	0	0	2	0	0

534. 81 Hanover Park – Of the 112 rooms tested within this building, 93 (83%) would comply with the BRE guidance for both winter and annual sunlight. Of the 19 remaining rooms, one would experience a moderate adverse effect with a reduction in APSH of between 30-40% and the remaining 18 would experience major adverse effects of greater than 40%.

535. For the rooms experiencing major adverse effects the reduction in APSH would range from 45.2% to 67.6% with retained APSH ranging from 11% to 24%. For winter sun, the major adverse effects be reductions ranging from 50% to 100% and retained winter sun ranging from 0% to 4%. Of note is that three rooms which would lose all of their winter sun would retain APSH of 24%, 26% and 27%, close to the 25% recommended within the BRE guidance. The ES categorises the overall sunlight impact on this building as moderate adverse and significant.

536. 102 Peckham High Street – Of the two rooms tested in this property, one would experience a major adverse effect in relation to winter sun (a 70% reduction and 3% retained) and a minor adverse effect in relation to annual sun (a 22.6% reduction and 24% retained). The other room would also experience a major adverse effect in relation to winter sun (75% reduction and 2% retained), but would comply with the BRE guidance in relation to annual sun. The ES categorises the overall sunlight impact on this building as negligible and not significant. Given the high levels of annual sun, officers consider that this categorisation is acceptable.

537. 112 Peckham High Street – Of the four rooms tested, three would comply with the BRE guidance and one bedroom would experience major adverse effects for both annual and winter sun, with a 64% reduction in annual sun (9% retained) and it would lose all of its winter sun (R1/970). The overall effect on sunlight is categorised in the ES as moderate adverse and significant.

538. 114 Peckham High Street – Of the six rooms tested within this building five would comply with the BRE guidance. The remaining room would comply in relation to APSH but would experience a major adverse effect for winter sun, with an 82.4% reduction and 3% retained. This room is at ground floor level and its

window is partially obstructed by a neighbouring building. The ES categorises the impact upon sunlight to this building as minor adverse and not significant.

539. 116 Peckham High Street – Of the six rooms tested, five would comply with the BRE guidance and one bedroom would experience a major adverse effect in both annual and winter sun. There would be a 57.7% reduction in annual sun (11% retained) and a 65.2% reduction in winter sun (8% retained – which complies with the BRE guidance). Bedrooms are generally considered to be less sensitive to sunlight, and as such this impact is considered to be acceptable. With balcony removed test would comply with BRE guidance so existing structure is having an effect. The overall effect on sunlight is categorised in the ES as minor adverse and not significant.

540. Dunstall House - Of the 76 rooms tested, 74 would comply with the BRE guidance (97%). Two rooms would experience minor adverse effects in relation to both annual and winter sun and as such the impact upon this building is considered to be acceptable. The overall effect on sunlight is categorised in the ES as minor adverse and not significant.

Overshadowing

541. The amenity spaces at the following properties have been tested, and all of them would comply with the BRE guidance. In light of this the ES concludes that the proposed development would have a negligible effect in terms of overshadowing, and officers concur with this conclusion.

- Rear gardens of 8-14 Highshore Road
- Peckham Square and Surrey Canal Walk
- Rear gardens of 114 Peckham Hill Street
- Wakefied House courtyard
- Goldsmith Square and Marmont playground
- Purdon House and Flamborough House courtyard
- 81 Hanover Park amenity space fronting Clayton Road
- Martock Court amenity space
- Rear gardens of 17-30 Winford Court
- Rear gardens of 27-46 Yarnfield Square

Spaces tested for overshadowing (in yellow)



542. TfL has raised overshadowing as a concern in relation to the bus station and agent of change principles; given that it is located directly to the north of the site the proposed development could result in some overshadowing. However, this would be transient, and given the frequency of the local bus services it is unlikely that people would have to wait there for long periods of time. Overall therefore, any impact upon the bus station in terms of overshadowing is not considered to be significant, and it is not considered that it would hinder the redevelopment potential of the bus station site in the future.

Privacy and overlooking

543. With the exception of 43 and 45 Rye Lane, the separation distances between the existing and proposed new homes would range from approximately 12m (to the rear of properties on Peckham High Street) to 25m (to the front of properties on Hanover Park). For the rear of properties on Peckham High Street, the 12m is measured to the rear boundary of these properties, which generally have single-storey rear additions to them. The residential properties on the upper floors of these buildings are set much further back, and as such it is not considered that they would experience any significant loss of privacy or overlooking.

544. There are flats on the upper floors of 43 and 45 Rye Lane which adjoin the existing Aylesham Centre building. The rear windows of these properties currently look out onto the side of the 2-storey part of the shopping centre which

contains a Ladbrokes betting shop and the Wing Tai oriental supermarket, and which is separated from the site by an alleyway which measures approximately 2.5m wide. The existing building would be replaced by proposed block F and the minimum separation distance would be approximately 9.5m which would fall below the 12m recommended when properties face each other across a street. The distance between the main back wall of these properties and block F would be 25m.

545. There would be a number of communal roof terraces within the proposed development, but their location and separation distance from the neighbouring properties is considered such that no undue loss of amenity would occur in terms of overlooking. If planning permission is granted on appeal, officers would recommend a condition requiring the roof terraces to close at 10pm daily.

546. The separation distances between the proposed buildings and the existing neighbouring buildings are considered to be sufficient to ensure that there would be no unacceptable loss of outlook or any unacceptable sense of enclosure.

Conclusion on amenity impacts

547. As stated earlier in the report, a development of the size and scale proposed would clearly have potential significant impacts on the amenities of occupiers of properties adjoining and in the vicinity of the site. With the exception of the new workspace and new homes which are not envisaged to cause any loss of amenity, the uses proposed would be similar to those which already exist at the site. Agent of change principles have been considered in accordance with the London Plan, and it is not considered that any significant adverse effects would arise. There would be some major adverse daylight effects and moderate adverse sunlight effects, but it is recognised that the site is allocated for a significant quantum of new housing and the BRE guidance should be used flexibly. In light of this, overall it is considered that the proposed development would not cause a significant loss of amenity to neighbouring occupiers which would have warranted a refusal of planning permission.

Noise and vibration

548. Policy D14 of the London Plan ‘Noise’ seeks to reduce, manage and mitigate noise in order to improve health and quality of life, and provides details of how this can be achieved including through design elements such as adequate separation distances, screening, layout, and adopting good acoustic principles. Policy P66 of the Southwark Plan seeks to mitigate adverse impacts caused by noise.

549. Chapter 9 of the submitted ES has confirmed that baseline noise survey comprised of unattended noise monitoring that was undertaken at the site from approximately 13:00 hours on Wednesday 3rd August 2022 to 14:30 hours on Monday 8th August 2022. It also confirmed that further attended noise monitoring were undertaken between approximately 15:00 hours and 15:30 hours on 3rd August 2022 and between approximately 12:30 hours and 13:45 hours on 9th August 2022. The purpose of the baseline survey was to inform the assessment

criteria for the construction noise, operational plant and traffic noise assessments. The survey also informed the site suitability assessment. Given that that commercial spaces are considered less sensitive to environmental noise, the report focused on residential properties .

550. The measurement data taken during the survey has been summarised in ES Volume 3, Annex 3. The assessment uses the ABC method to assess potential noise impact, which is the preferred approach. This compares the predicted or measured noise levels against baseline levels as to determine the significance of noise effects and whether mitigation is required.

551. The ES indicates a moderate to major significant effect for a number of receptors during specific works within the site. The ES has stated that the demolition and construction programme is anticipated to take approximately 9 years comprising of two main phases. During the demolition and construction works, there would be the potential for noise and vibration associated with demolition, earthworks, installation of necessary services and building construction works. This would be a moderate to major adverse significant impact upon a number of receptors during specific works.

552. The primary source of ground-borne vibration would be on-site piling activities. The predicted effects (to the closest receptors) would however be classed as negligible to minor and would not be significant. When the distance increases beyond 20m, all receptors would experience a negligible impact.

553. The vehicle movements and composition of HGVs have been used to calculate the change in noise levels due to the addition of construction traffic. The predicted increase in noise level would however result in a negligible effect.

554. The predicted change in noise level as a result of operational road traffic indicates that there would be a negligible effect on all of surrounding public roads.

555. If planning permission is granted on appeal, a condition would be required to ensure that operational plant would have an appropriate impact. This condition would also include an updated baseline noise survey as to establish background sound levels once the proposed development has been completed.

556. The proposed retail, office, food and drink units would create a level of noise but these again could be controlled through appropriately worded conditions. For instance, restriction upon opening times.

557. The recommended internal noise levels could be achieved a condition and with this in place, the scheme would have an acceptable impact in terms of internal noise.

558. The proposed report has considered the impact the development would have upon the adjacent residential properties upon both McKerrell Road and Hanover Park from construction to completion. Through the predicted demolition and construction vibration period, the impact upon these nearby residential properties

would be minor adverse (not significant). When completed, the scheme would then have a negligible impact upon the adjacent residential properties. This includes the impact from commercial as well as operational road traffic noise.

559. The submitted equalities assessment has referenced nearby schools to the west and north of the east of the site. For instance, there is John Donne primary which is approximately 0.5 mile to the East of the site and there is also a nearby SEN school at Cheery Garden School (to the west) which is approximately 0.3 miles from the site. It is noted that these could reasonably be affected by noise and that the submitted noise report does not specifically reference the impact upon these schools. This was raised with the applicant who drew attention to the number of buildings and other residential properties in the surrounding area which are located in-between the site and the schools and which would help mitigate any impact. Any impact upon them in terms of noise is therefore unlikely to cause harm but this would need to be addressed and mitigated against in an updated noise report were the application to be approved on appeal.

560. The Equality Impact Assessment references the impact upon the Islamic Centre and like the schools, this is not specifically mentioned in the Noise Report. The siting of the Islamic Centre is however in the same position as Receptor B as highlighted in the report. The impact upon the Islamic Centre has therefore not been specifically referenced but has been considered. Like the other surrounding properties, noise to this receptor would range from negligible to moderate adverse (during demolition and construction). This does raise concern and given that this is a place of worship, further mitigation measures would be required. This would therefore need to be explored further were the development granted permission on appeal, and could be addressed by way of a condition.

561. As such and with conditions in place, the office/ commercial premises as well as the impact from the adjacent road/ bus station would not cause undue harm and the living conditions of the future occupiers would be preserved.

Transport impacts

562. Section 9 of the NPPF ‘Promoting sustainable transport’ requires transport issues to be considered from the earliest stages of plan-making and development proposals. Paragraph 117 requires applications for development to give priority first to pedestrian and cycle movements so far as possible, to address the needs of people with disabilities and reduced mobility, to minimise conflict between pedestrians, cyclists and vehicles, and be able to accommodate vehicle charging. Paragraph 118 of the NPPF states that all developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a vision-led transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored.

563. The transport policies of the 2021 London Plan are set out in chapter 10 and seek to ensure sustainable modes of travel, with more journeys made by walking and cycling and the delivery of healthy streets. Policy T1 of the London Plan sets out the Mayor’s strategic approach to transport, including setting a target of 80%

of all trips in London to be made by foot, cycle or public transport by 2041; policy T2 relates to healthy streets and is considered in detail later in the report, and policy P3 relates to transport capacity including safeguarding existing land and buildings used for public transport. Policy T4 requires the transport impacts of proposals to be assessed and mitigated, and cycle and car parking requirements are set out in policies T5, T6, T6.1 and T6.5. Policy T7 relates to deliveries, servicing and construction and requires development proposals to facilitate safe, clean, and efficient deliveries and servicing. There are a number of transport related policies in the Southwark Plan, including policy P45 'Healthy developments' which includes a requirement for developments to be easily accessible from the walking and cycling network, P49 which relates to public transport, and policy P50 which relates to highways impacts.

564. The site has a public transport accessibility level (PTAL) of 6b which is the highest PTAL rating indicating excellent access to public transport. It sits within the Peckham (B) Controlled Parking Zone (CPZ) which operates between 8.30am and 6.30pm Monday to Saturday. Traffic and transport are considered in chapter 7 of the ES, which is accompanied by a Transport Assessment (TA) and TA addendum.

Demolition and construction

565. An Outline Construction Logistics Plan (CLP) has been submitted with the application, which predicts that during the peak construction period in quarter 4 in 2031 there would be 43 construction vehicles per day. Owing to the reduction in the size of the car park and the closure of the petrol station, traffic flows in the area would be reduced during the construction period, albeit with some increases in the number of HGVs. The ES considers the impact of this and concludes that there would be short-term significant adverse effects on severance of communities and delay for non-motorised users within the site, as a result of the temporary closure of routes through the site. Officers concur with this conclusion, and if planning permission is granted on appeal it is recommended that a detailed CLP be secured by way of a condition or planning obligation. The CLP should be subject to consultation with TfL in order to ensure that there would be no adverse impacts upon the bus station, and it should also include details of vehicle routes and how deliveries would be managed.

Completed development

566. Healthy streets assessment – Policy T2 of the London Plan requires development proposals to demonstrate how they would deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance, how they would reduce the dominance of vehicles on London's streets whether stationary or moving, and how they would be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport. The table below sets out the London Plan healthy streets criteria, and how the proposal would address these.

Indicator	**Response to indicator**

Pedestrians from all walks of life	There would be clear pedestrian routes through the site which have been informed by a study of existing desire lines. Whilst some of the routes would also be used for servicing, these would have segregated pedestrian areas which have been designed to be accessible to all.
Easy to cross	Improvement works are proposed along Hanover Park to make it easier for people to cross the street into the site. There would also be improvements to the pavements around the site to allow for safer pedestrian movements.
Shade and shelter	Shade and shelter would be provided through the new landscaping which could be secured by way of a condition.
Places to stop and rest	Seating would be provided in the public realm, and this could be secured through a landscaping condition.
Not too noisy	Traffic movements within the site would be limited to servicing vehicles which would travel around the edges of the site or the internal service yard for the supermarket. None of the uses proposed are likely to be particularly noisy.
People choose to walk, cycle and use public transport	The proposal would improve the pedestrian environment around the site by creating through routes in the site and providing landscaped public realm. Cycle parking would be provided on the

	site and measures are proposed to improve pedestrian and cyclist access through the bus station.
People feel safe	Active frontages would ensure that natural surveillance occurs. The range of uses would bring activity to the site at different times of the day and night.
Things to see and do	The proposal would deliver a range of town centre uses, offering services to the public.
People feel relaxed	The proposal would help to create a pleasant, landscaped environment for sitting and walking, and there would be areas for external seating outside some of the flexible retail spaces.
Clean air	There would be a significant reduction in the number of cars travelling to and from the site. Future occupiers would be prevented from obtaining parking permits which would encourage alternative modes of travel.

567. Active travel – The applicant has undertaken an Active Travel Zone Assessment, details of which are set out in the TA. It identifies six key routes between the site and local facilities, which are Peckham Rye Station, the Harris Academy, Lister Health Practice, Cossall Park, Peckham Library / Surrey Canal Path, and the northern stretch of Rye Lane down to the junction with Hanover Park; daytime and nighttime assessments have been carried out on all routes except to the Harris Academy and Cossall Park, which were only assessed during the daytime. The TA sets out a number of recommendations for works along these routes, and that closest to the site is improving the pavement and cycleway along Rye Lane.

568. TfL has reviewed the active travel assessment and requested further information in relation to the safety of women and girls, including along Peckham Yards, together with s106 contributions to secure improvements along Rye Lane and

Hanover Park, to provide lighting at Peckham Rye Station, and improvements to paving in the local area. The application proposes to carry out a package of measures along Hanover Park which would include narrowing the carriageway, widening the pavements and providing raised tables, which could be delivered as part of a package of s278 works. This is explained further later in the report, and if permission is granted on appeal, it is recommended that these works should be secured through a s278/ s106 agreement as appropriate.

569. With regard to the safety of women and girls, the range of uses and active frontages proposed are such that there are likely to be many people around at different times of the day and night. Conditions would ensure that the public realm is well lit and planting properly managed so that it would not obstruct sightlines or provide hiding places.

570. Access – Policy D5 of the London Plan 'Inclusive design' requires development proposals to achieve the highest standards of accessible and inclusive design. It specifically requires Design and Access Statements (DAS) to include an inclusive design statement; in this instance an access statement is appended to the DAS.

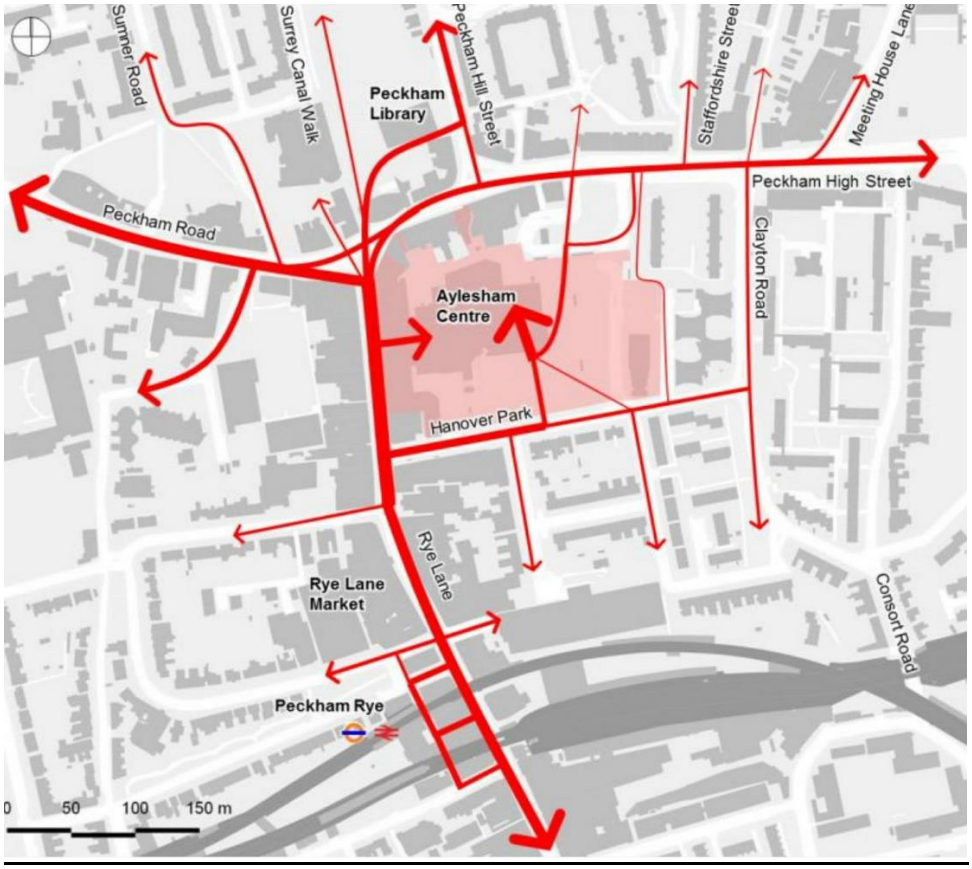
571. Pedestrians can currently access the site from Rye Lane (through the shopping centre), Hanover Park, and Peckham High Street via the bus station; although access to the bus station is only intended to be for people using the buses, it is a well-used local north-south route. For vehicles there are two access from Hanover Park, one of which is close to Rye Lane and leads to an internal servicing yard, and the other is close to McKerrell Road and leads to the car park and petrol station. McKerrell Road is effectively a dead-end with some partially open metal fencing at end, and there is a secondary, barriered access to the petrol station from this street. The applicant also has a vehicular right of access to the site across the bus station for servicing only, and this is explained further later in the report.

572. The proposed site layout has in part been informed by a Space Syntax study which was carried out in 2018. This study tracked the way in which people move through and around the site, in order to understand what the existing desire lines are.

573. Pedestrians - Policy P51 of the Southwark Plan 'Walking' requires development to enhance the borough's walking networks by providing footways, routes and public realm that enable access through development sites and adjoining areas; routes and accesses must be safe and inclusive, and any disruption to walking routes during construction must be minimised.

574. As shown on the image below, there are a number of pedestrian routes through the site, including to the bus station via an opening in a boundary wall which separates the two sites. There are two island crossings on Hanover Park (i.e. refuges), and another across the entrance to the supermarket car park on Hanover Park.

Existing pedestrian routes through and around the site

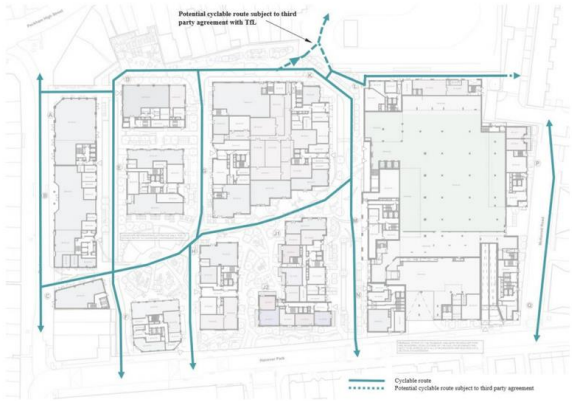


The proposed pedestrian, cyclist and vehicle routes through the site are shown on the image below.

Proposed pedestrian and vehicle routes



Proposed cycle routes



575. Concerns have been raised by neighbouring residents regarding the additional number of people using the site and the surrounding streets, leading to overcrowding and unsafe conditions on the pavements. Concerns have also been raised regarding the shared use of some of the internal routes by servicing vehicles, cyclists and pedestrians, and the potential for conflict between these

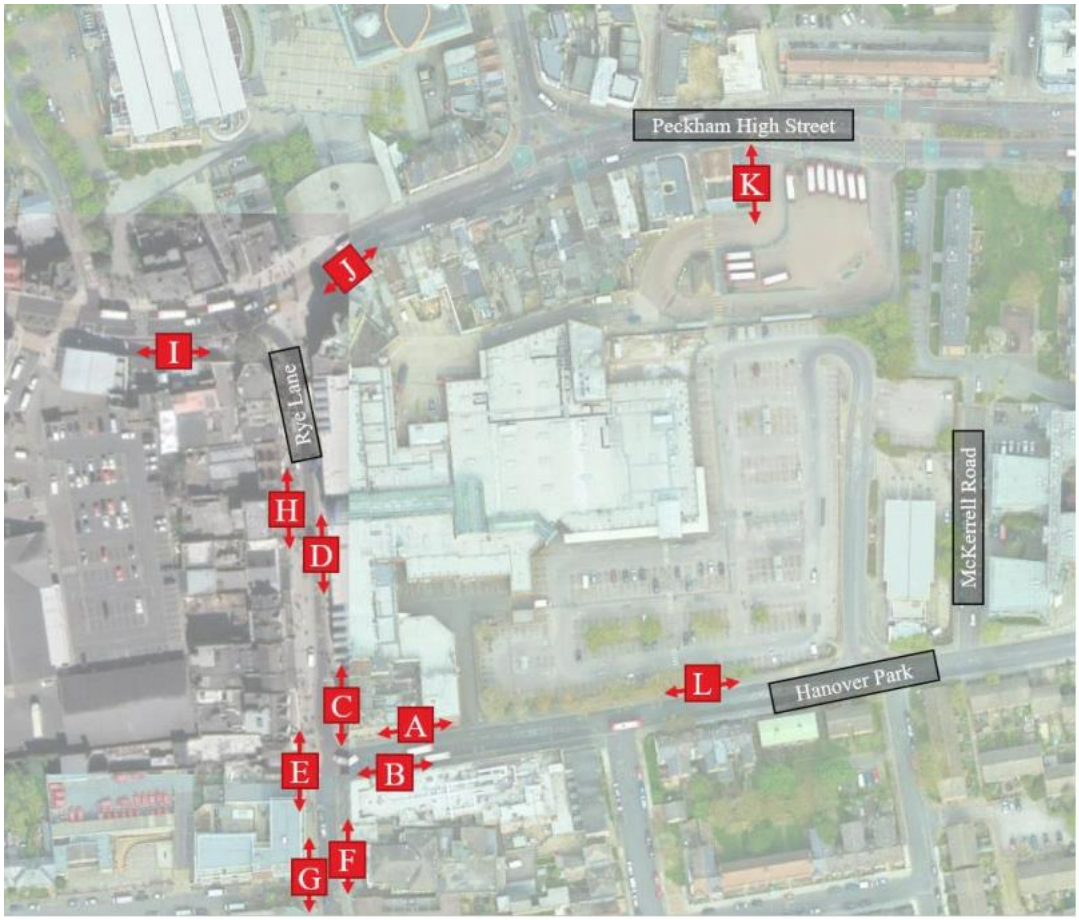
different users.

576. The TA includes information about Personal Injury Accidents (PIAs) in the vicinity of the site relating to pedestrians, cyclists and powered two-wheelers (including incidents involving cars, busses and goods vehicles). It concludes that Peckham Road and Peckham High Street (the A202) experience a higher number of collisions compared with the wider network, which reflects the higher volume of movement along this road. The TA states that the proposed development would result in a net reduction in vehicle movements, to offset any increase in pedestrian movements on this corridor.

577. Following on from the 2018 Space Syntax study, the TA includes an analysis of the number of pedestrians moving through the site based on additional surveys which were carried out in 2022. This was used to inform a Pedestrian Comfort Level Assessment based on TfL's Pedestrian Comfort Guidance (2010), which recommends minimum footway widths based on the estimated number of pedestrians using the footway per hour, and assigns a rating based on the level of crowding a pedestrian would experience.

578. Footway widths around the site boundary are currently a minimum of 2.5m wide along Rye Lane (outside the site), 2m on Peckham High Street, 1.5m on McKerrell Road, and 1.4m on Hanover Park. The TA concludes that pedestrian comfort levels around the site generally meet or exceed the recommended comfort levels, although it does identify some pinch points where the pavements are not currently wide enough; those closest to the site are an area on the northern side of Hanover Park close to the junction with Rye Lane, and also in the bus station (locations A and K on the image below).

Locations for pedestrian comfort level assessments



579. The TA predicts that there would be an additional 96 pedestrian trips in the morning peak hour and 106 pedestrian trips in the evening peak. Whilst TfL consider that this figure would be higher, the applicant has carried out an additional assessment in the TA addendum including sensitivity testing, and officers are satisfied that the trip rates which have been provided are acceptable. The TA confirms that the majority of the local footway network would continue to perform with a good level of pedestrian comfort, although the pinch points at locations A and K would remain. A package of highway works outside of the red line site boundary is proposed as detailed later in the report, and it is considered that subject to these works, pedestrian comfort levels in and around the site would be acceptable. Of note is that on Rye Lane one section of the pavement would be widened broadly in the centre of block A/B/C and there would be two new routes into the site from Rye Lane, potentially easing the pressure on this street. On Hanover Park the pavement widths would increase from a typical width of around 2.5m to in excess of 4m.

580. The TA also identifies that location E on the western side of Rye Lane would become 'at risk' in terms of pedestrian comfort levels following the proposed development, mainly due to the placement of an existing phone box. The TA refers to the TfL guidance which sets out that in circumstances where it is not possible to increase the footway width, it is important that the footway 6m either side of the pinch point is clear of obstructions; in this instance the footway either

side of the phone box is clear of obstructions therefore this stretch of Rye Lane would remain acceptable in terms of pedestrian comfort levels.

581. With regard to the use of shared spaces, most of the servicing vehicles would be limited to a servicing loop around the edges of the site, and this is explained in detail later in the report. Along this loop there would be segregated pedestrian areas to avoid conflict between pedestrians and vehicles. The number of servicing vehicles using the site is estimated to be a maximum of 19 vehicles per hour (excluding bicycles and motorcycles), which would be a relatively low level of use and vehicle speeds would be very low due to the design and layout of the proposed development. As explained later in the report officers would seek to secure a number of servicing restrictions, particularly concerning HGV trips, in the event that planning permission is granted on appeal.

582. Cyclists – Key cycling routes near the site are along Rye Lane and Peckham High Street. On Rye Lane there is a segregated southbound cycle lane outside the site, and cyclists travelling northwards use the carriageway. The TA advises that there is a high level of cycle movement along these streets, and estimates that there would be an additional 30 cycle trips in the morning peak hour and 35 in the evening peak as a result of the proposed development. Whilst cyclists would be able to ride through the site, the TA expects that for most cyclists the site would be a starting point or a destination rather than a route through for onwards travel elsewhere, and officers concur with this assessment.

583. In order to mitigate the impact of the additional cycle trips, it is recommended that a s106 contribution is sought towards cycling improvements on the stretch of Rye Lane outside the site. The council's Transport Projects Team has developed a scheme of works which is costed at approximately £226,000, and if planning permission is granted on appeal, officers would seek to secure funding for this scheme as part of the s106 agreement.

Proposed measures outside of the red line planning application boundary

584. As referred to above, the applicant proposes to carry out a package of works outside of the application boundary. The council's Highways Development Management Team has made a number of comments on the application, and has advised that the carriageways along Rye Lane (outside the site), Hanover Park and McKerrell Road would need to be resurfaced as a result of the proposals.

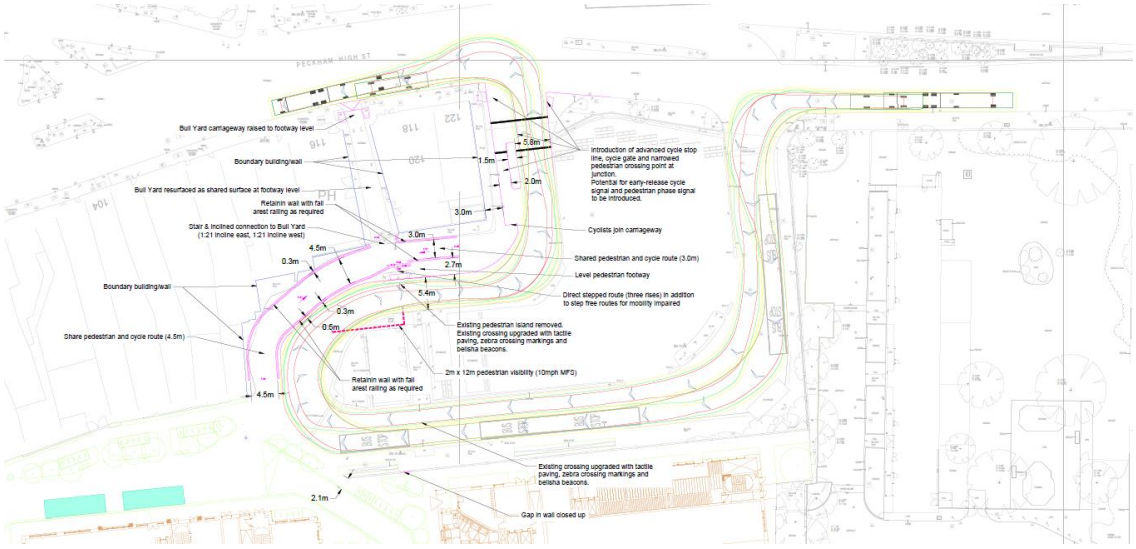
585. The bus station and Bull Yard – During the course of the application officers have held joint meetings with the applicant and TfL regarding a proposed scheme of works to the bus station, to mitigate the impacts of the proposed development upon it and to improve connections to and from Peckham High Street. The appellant estimates that the number of pedestrians walking through the bus station from the existing Aylesham Centre is approximately 3,000 per day, and that this would increase to around 3,500 per day as a result of the proposed development. Whilst there are currently two pedestrian crossings in

place in the bus station, access to it from the site is via a relatively narrow opening in the existing boundary wall. The northern-most pedestrian crossing within the bus station broadly aligns with Bull Yard, which sits between numbers 116 and 118 Peckham High Street. Bull Yard is at a lower level than the bus station and is separated from it by a set of railings; as such it does not currently provide any access between the bus station and Peckham High Street.

586. There have been several iterations of proposed works to the bus station, the latest of which includes a 4.5m wide pedestrian and cycle route on the western side of the bus station, with the gap in the existing boundary wall closed up to direct people to the new route. There would be both stepped and step-free access to Peckham High Street via Bull Yard, and works are proposed around the eastern and western bus station accesses to improve safety for cyclists. Whilst TfL has expressed concerns regarding the methodology applied in calculating the potential increase in trips, the proposed improvements to the bus station are considered to mitigate the impact of the development in this regard, and the council's Transport Policy Team is satisfied that the assessment is acceptable.

587. This proposal is currently with TfL for review, and officers will provide Members with an update through an addendum report. If a proposal can be agreed with TfL, officers would seek to secure this through a s106 agreement if planning permission is granted on appeal. Given the importance of ensuring the safety of all users of the bus station, officers would seek to prevent the occupation of any part of the development until / unless the bus station works have been completed. The applicant has advised that they would fund and carry out these works, and would need to obtain a separate licence from TfL to do so.

Proposed works to the bus station / Bull Yard



588. Hanover Park and McKerrell Road – On Hanover Park the proposed works include narrowing the carriageway whilst still allowing for 2-way bus movements, increasing the footway widths, new raised tables, a new bus shelter and removal

of the existing 'island' crossings. The proposals have been reviewed by the council's Highways Development Management Team and are supported, and should be secured through a s278 agreement if planning permission is granted on appeal. TfL has made some detailed technical comments including in relation to the raised tables and their impact upon bus passenger safety, and these matters could be resolved through a s278 agreement with the council as Highway Authority, in consultation with TfL.

589. On McKerrell Road the works would comprise a new raised table at the entrance to the street, a new off-street bollard controlled turning area for refuse vehicles mid-way along the supermarket block, a revised parking layout to accommodate this, and new tree planting. This work would result in the loss of eight on-street pay and display parking spaces, reducing the current 17 spaces to nine. The council's Parking and Development Team which has raised concerns about this on the basis that there are a lot of homes in the area but not many parking bays; of note is that the applicant's parking survey shows that the existing spaces were 100% and 88% occupied on the two days on which parking surveys were undertaken.

590. The Parking and Development Team has therefore suggested that the appellant explores whether these bays could be relocated nearby such as on Clayton Road or Hanover Park, where safe to do so, and has advised that any changes to on-street parking would be subject to a statutory consultation process and the council's decision making process. If planning permission is granted on appeal, officers would seek to secure the reprovision of these spaces elsewhere in the vicinity. Given the importance of these highway measures, officers consider that they should be completed prior to the occupation of any part of the development.

Proposed works to Hanover Park and McKerrell Road

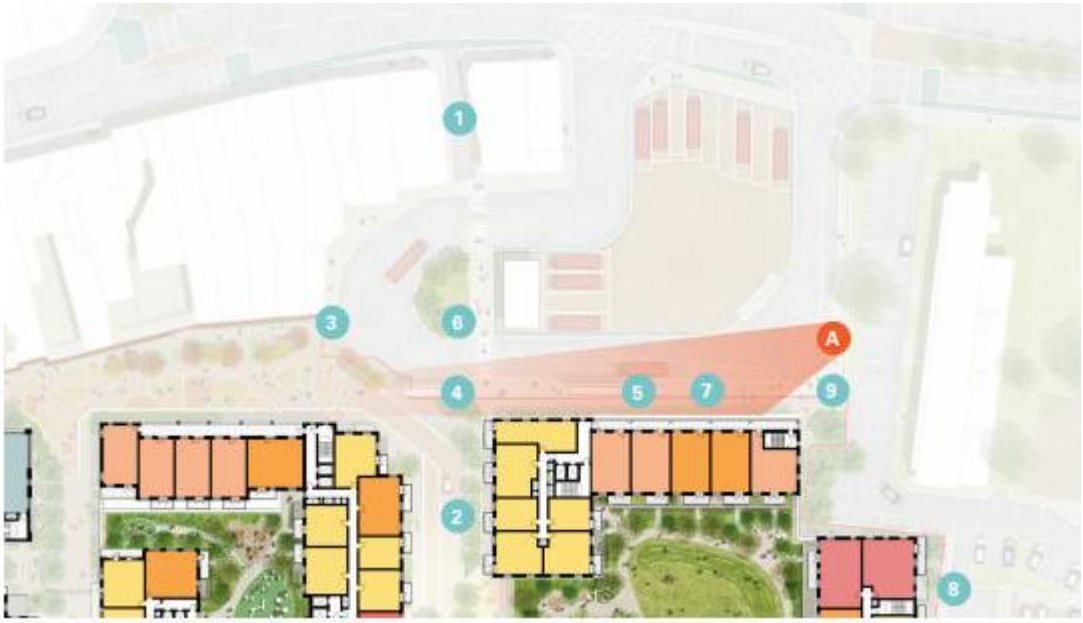


591. Purdon House and the Clifton Estate – The TA sets out the potential to create a new pedestrian connection from the site through the Clifton Estate, as shown on the image below. TfL has a strong preference for this route to be secured and delivered as part of the proposed works, on the basis that it would reduce the number of pedestrians and cyclists that would potentially cut through the bus station.

592. Whilst officers are supportive of the creation of this route in principle, it would need to be subject to a fully worked-up proposal and a council-led consultation with the residents of the Clifton Estate who would be most directly affected by it. The Clifton Estate Tenants and Residents Association (TRA) has objected to the application for a number of reasons, including questioning how the development would knit into the wider neighbourhood, the need for specific design engagement around mitigating the impacts of routes through the estate, questioning whether the transport assessment identifies the number of pedestrians/other journeys which would be made through the Clifton Estate as a result of the proposal, and questioning how the proposal would knit into neighbouring land.

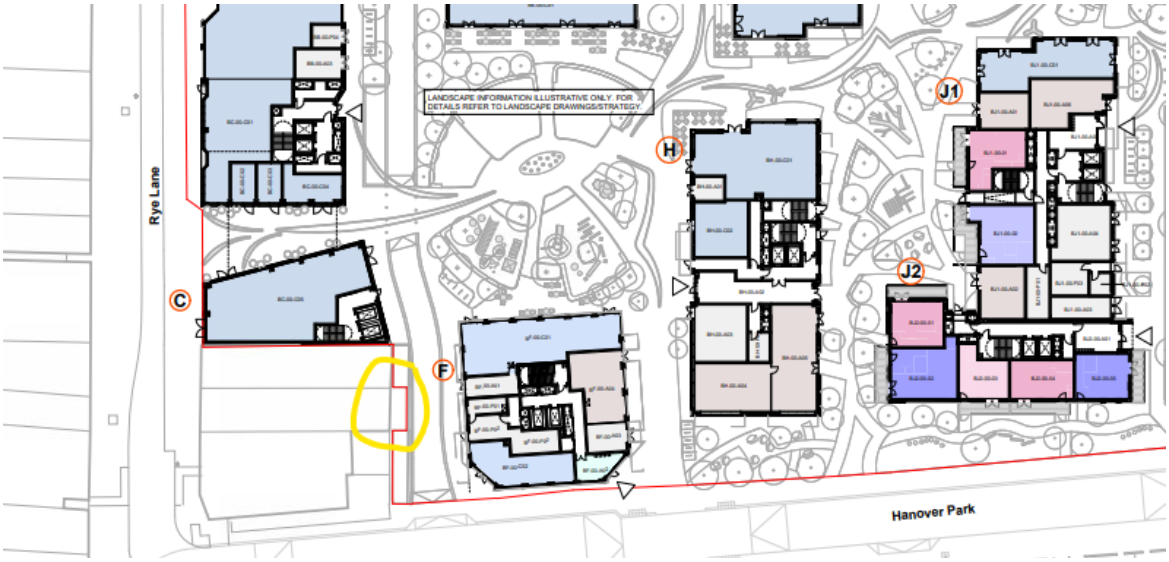
593. Provided improvement works to the bus station can be secured as outlined above, officers do not consider that it would be appropriate to prevent the occupation of the development until / unless a route to the Clifton Estate has been delivered. If planning permission is granted on appeal, it is recommended that it should be subject to a s106 obligation requiring the developer to prepare and submit to the council a scheme of works for a route to the Clifton Estate, and to fund and deliver it if appropriate, following consultation with the Clifton Estate residents.

Potential connection from the bus station to the Clifton Estate / McKerrell Road (no. 9 on the image below)



594. Rear of 45 Rye Lane - In addition to the above the TA identifies a 'notch' in the redline boundary at the rear of 45 Rye Lane in the south-western corner of the site. The TA suggests that a continuous footway should be delivered in this location and whilst officers concur with this, it would be contingent on the consent of the landowner. This issue is not considered to be so significant that permission should be withheld until / unless it is delivered.

'Notch' in red line boundary



595. Overall and subject to the delivery of the mitigation measures outlined above, the pedestrian and cyclist access arrangements through and around the site are considered to be acceptable. Moreover it is considered that they would deliver the new north-south and east-west green links required by site allocation NSP74. TfL has requested a contribution of £22,000 for the provision of legible London signage within and around the development to assist with wayfinding, together with a way-finding strategy including an audit of existing signage. As set out later in the report, there is a limit to the financial contributions which the development can viably support, and the recommended priorities are set out in the planning obligations section of this report.

596. Servicing – At present servicing for the site takes place from two shared service yards located on the west side of the site. The northern service yard serves Morrisons and the shops fronting Rye Lane to the north of the supermarket, and is accessed via the bus station. The southern service yard is accessed from Hanover Park and is used by the shops to the south of the supermarket. The applicant considers that the access right across the bus station for servicing runs with the land and would therefore remain post completion of the proposed development, whereas TfL consider that it only applies to the existing development.

597. A Delivery and Servicing Plan is appended to the TA. Servicing activities associated with the proposed development are likely to include maintenance activities, refuse collection, deliveries to the new retail uses and workspace,

deliveries to the supermarket, and deliveries to the new homes. Servicing would be carried out by a range of vehicles, including articulated Heavy Goods Vehicles (HGVs) for the supermarket, 10m rigid lorries, box/ light vans and mopeds/ cargo bikes, and the majority of servicing activities are predicted to take place between 7am and 7pm. Most of the servicing (with the exception of a small number of deliveries/ servicing trips on McKerrell Road) for the proposed development is expected to take place from within the site, as shown on the image below.

Proposed servicing vehicle routes (plus emergency vehicles)



598. Servicing vehicles would move through the site in a clockwise direction, entering from the western-most access off Hanover Park and predominantly exiting back onto Hanover Park next to proposed block N. Tracking diagrams have been submitted and the council's Transport Policy Team has advised that they are acceptable. This includes tracking diagrams for articulated lorries approaching from Clayton Road using the mini-roundabout, and entering and exiting the supermarket servicing yard in a forward gear.

599. The servicing 'loop' would contain clearly delineated pedestrian routes, and the central north-south route would have limited vehicular access which would be bollard controlled and managed by an on-site management team. There would be four marked loading bays along the servicing loop, and all of the commercial deliveries and servicing (including refuse collection) would be scheduled through a booking system which would provide a target delivery window. The loading bays could also be used for deliveries to the new homes, with most deliveries taken directly to a post room or to the concierge on the ground floor of block M; use of the loading bays would initially be restricted to 20 minutes, which would be

controlled by on-site management.

600. TfL requested further information regarding the likely use of the loading bays including dwell times, which the applicant has responded to through the TA addendum. This document sets out how many vehicles could be accommodated in the loading bays (depending on the vehicle type), and based on observations of similar mixed use developments dwell times are estimated as between three and 20 minutes.

601. With regard to refuse storage and collection, the proposals are set out in an Operational Waste and Recycling Management Strategy which was updated in December 2024. The council's Waste Management Team queried the drag distances between refuse stores and collection points, whether there would be dropped kerbs at the collection points, and whether space for storing food waste has been considered.

602. Refuse and recycling stores would be provided throughout the development and the size requirements for the residential stores have been calculated in accordance with the council's standards, including an allowance for future food waste collection. Most of the new homes would be within 30m of a refuse store, and on collection days bins would be moved by on-site staff to within 10m of the collection point, which would be the loading bays on the servicing loop which would have dropped kerb access. The on-site staff would then return the empty bins back to the refuse stores. Similar arrangements would exist for the non-residential uses, albeit that the collection would be via private contractors rather than the council. Waste from the supermarket would be collected from the internal servicing yard, and litter bins and cigarette bins would be provided throughout the public realm. Once full the litter bins would be emptied and the waste taken to a store room for collection.

603. Servicing access across the bus station - As set out earlier in the report, the applicant currently has a two-way right of access across the bus station for servicing, which is the only means of accessing the northernmost servicing yard; the TA advises that the Jones and Higgins building (of which the applicant is the freeholder) also has a right to service via this route. It is proposed to retain this route as part of the proposals, but use it as a one-way egress only, with servicing vehicles able to enter via the application site and exit via the bus station using bollard controls. TfL is of the view that the access right would not apply to any new development on the site and has advised that if planning permission is granted which relies upon a right of access which does not exist, then it will not be possible to implement some or all of the scheme.

604. The right of access is ultimately a private matter which must be resolved between the two parties. The TA states that use of this route is expected to be extremely low, although this is not quantified, and that the vehicle access strategy does not rely upon it. Regardless of whether the access right would apply to the new development, on highway safety grounds and in planning policy terms the site should service from its own land; servicing across a bus station is an unusual situation which could become problematic, especially given the additional numbers of cyclists and pedestrians likely to be travelling across the bus station.

In light of this and given that the proposed development could function adequately without this additional servicing access, officers would seek to restrict the use of it to emergency vehicles only in the event that planning permission is granted on appeal.

605. The site location plan shows that numbers 74, 76, 96, 98 and an area of land at the rear of 100 Peckham High Street are also within the applicant's control, and the applicant has advised that these buildings would be able to use the servicing loop upon completion of the development. The remaining buildings along this stretch would need to use an on-street loading bay which is the current authorised situation. The nearest on-street bay is on Peckham Hill Street at the junction with Peckham High Street, and is within 100m of all of the aforementioned properties.

606. Servicing for the proposed supermarket would take place from an internal service yard at ground floor level which would be accessed from Hanover Park. It would be large enough to accommodate a single maximum legal length (16.5m long) HGV at a time, and vehicles would be able to enter and exit the yard in a forward gear. The TA addendum sets out that there would typically be 6-7 deliveries / collections to the supermarket per day including waste collections, using a mix of articulated and rigid lorries. In addition to a detailed delivery schedule a system called Microlise would be used, which tracks delivery vehicles and sends an alert when the vehicle is 15 minutes away from the store. The TA sets out that Morrisons does not intend to use the store for the fulfilment of on-line orders for home deliveries, and if planning permission is granted on appeal officers would seek to secure this by way of a condition, because the transport implications of this have not been assessed and would likely be significant.

607. TfL has advised that servicing hours for the supermarket should be restricted to avoid peak hours and school pick-up times, to avoid safety and operational issues for busses travelling along Hanover Park. Officers agree with this, and would seek to restrict the use of HGVs to avoid peak / school times, potentially between 8-9am, 3-4pm and 5-6pm.

608. Servicing along McKerrell Road including refuse collection would take place from the street, with space to be provided for light goods vehicles to stand. At present this road terminates to the south of Purdon House, and there is no turning space for refuse vehicles. It is proposed to provide a turning-head on this street to enable refuse trucks to turn around rather than having to reverse down the street. The council's Highways Development Management Team is satisfied with these proposals in principle, and if planning permission is granted on appeal officers would seek to secure these works through a legal agreement. As set out earlier in the report this would result in the loss of some on-street parking, which should be relocated elsewhere in the vicinity.

609. Overall the servicing strategy for the proposed development is considered to be acceptable, subject to the restrictions outlined above including no servicing via the bus station. If planning permission is granted on appeal officers would seek to secure a detailed Delivery and Servicing Management Plan, together with a monitoring fee of £2,790 to enable the council to monitor the effectiveness of the

servicing strategy and implement additional measures in the future if required.

610. Trip generation – Trip rates for the proposed development are set out in the TA, and have been updated in the TA Addendum to reflect the changes which were made to the application. The TA sets out how the estimated trip generation for the proposed development has been arrived at, including a review of trip generation from other sites using TRICS (Trip Rate Information Computer System), and vehicle counts at the site. TfL has raised concerns regarding the estimated trip rates, and considers that they would be between 17%- 45% higher than those estimated by the applicant, particularly walking and cycling trips. The applicant has responded to this in the TA addendum by selecting some different TRICS sites for analysis and carrying out sensitivity testing, and has concluded that the trip rates set out within the TA are robust. TfL has however, requested active travel measures as mitigation, namely bus accessibility improvements.

611. The impact of additional walking and cycling trips has been considered earlier in the report. For vehicle trips the TA sets out that based on site surveys undertaken in November 2022 there were 269 vehicle trips and eight HGV trips during the morning peak hour and 650 vehicle trips and one HGV trip during the evening peak hour. It is estimated that the total vehicle trips generated by the site would reduce by 78 during the morning peak hour and 275 during the evening peak hour, due to the significant reduction in the number of parking spaces provided for the supermarket and the removal of the petrol station. Given the minimal on-site residential parking provision, the new homes would not generate a material number of vehicle trips (with the exception of deliveries and servicing).

612. Public transport trips – Policy P49 of the Southwark Plan 'Public transport' is relevant, which requires development to demonstrate that the public transport network has sufficient capacity to support any increase in the number of journeys by the users of the development. It sets out requirements to improve accessibility to public transport and improve, maintain enhance public transport services.

613. The site is very well served by public transport, as it adjoins Peckham bus station and there are bus stops along Hanover Park. The site is within 250-420m of Peckham Rye railway station which is located to the south of the site on Rye Lane and serves a number of routes across London and to the wider south- east. Concerns have been raised by neighbouring residents regarding overcrowding on public transport as a result of the proposed development.

614. The applicant has estimated that the proposal would result in 168 additional bus trips in the morning peak and 283 additional bus trips in the evening peak. TfL considers that there would be between 15-40% more trips across all modes than this, but that there is sufficient capacity on the bus network to absorb the additional bus trips and as such has not requested a s106 contribution towards increasing bus capacity. TfL has however, requested a contribution of £80,000 towards bus accessibility improvements along Hanover Park and Rye Lane including countdown facilities and shelters; officers consider that this should be secured through a s106 agreement if planning permission is granted on appeal.

615. In terms of trips by rail, it is estimated that the proposal would result in 206

additional trips in the morning peak and 147 additional trips in the evening peak, and an increase of 7-10% of people entering Peckham Rye Station; the TA concludes that this would not have a significant impact upon train capacity.

616. A neighbouring resident has raised concerns that table 44 in the TA indicates that the proposed development would only add 72 people using the train from Queens Road Peckham which is approximately 650m to the north-east of the site. The objector considers that the figure is likely to be much higher, particularly during the winter, and that currently trains are sometimes too full to board. The 72 additional passengers to which this refers would be boarding the London Overground at Peckham Rye Station and travelling in the direction towards Queens Road Peckham(eastbound). Officers have reviewed this and consider that, although the London Overground experiences congestion during peak periods, the impact of the additional passengers generated by the development would not be significant enough to make the development unacceptable in planning terms.

617. Network Rail has commented on the application and whilst they have not requested a contribution towards increasing train capacity, a contribution has been sought towards a scheme to upgrade Peckham Rye Station including wider platforms and step-free access, and this request is supported by TfL; no contribution amount has been included in the Network Rail response. As set out later in the report in relation to s106 obligations, given that the scheme is not financially viable, priorities will need to be established in terms of s106 contributions for mitigation. Officers have identified works to the bus station, Hanover Park, McKerrell Road and the Rye Lane cycle route as the immediate priorities, and do not therefore recommend that a contribution towards the rail station works is sought in this instance. It is noted that CIL contributions can be used for funding this type of infrastructure.

618. Cycle parking – Cycle parking requirements are contained in both the London Plan and the Southwark Plan, and is required to be weatherproof and secure; further guidance is contained within the London Cycling Design Standards.

619. There would be a total of 1,614 long-stay spaces within the development, comprising 1,520 for the new homes, 26 for the supermarket, 24 for the flexible retail space, and 44 for the proposed workspace. The spaces would be located in a number of centralised hubs within blocks C, F, G, H, J, L and Q, and within the public realm, and would include a minimum of 20% Sheffield stands and at least 5% Sheffield stands for oversized bicycles.

620. For short-stay cycle parking there would be 256 spaces within the public realm, comprising 44 spaces for the new homes, 63 for the supermarket, 142 for the flexible retail space, and seven for the proposed workspace. The image below shows the location of the proposed cycle stores and the access routes to them.

Proposed cycle stores and access routes



621. In terms of numbers, the proposed level of cycle parking would comply with the London Plan standards but not with the Southwark Plan, and this has been raised as a concern by the council's Cabinet Member for Clean Air, Streets and Waste (now Leader of the Council).

622. The applicant has estimated that in order to comply with the Southwark Plan standards an additional 1,200 sqm of space would be needed for long-stay cycle parking within the various buildings, and an additional 80sqm of space would be required within the public realm for the additional short-stay spaces required. Whilst the shortfall against the Southwark Plan standards is noted, it is recognised that all but one of the buildings would be mixed use and therefore require separate cores and would have different plant space requirements. Moreover, the public realm would have to work very hard to accommodate the demands likely to be placed on it, including high levels of footfall, servicing activities, and the need to provide high quality public space incorporating planting, seating and playspace. On balance therefore, the proposed number of cycle parking spaces is considered to be acceptable in this instance.

623. Some of the residential cycle parking would be above ground floor level, but would be served by two lifts and could be accessed from a stair core. Residents would need to walk between 6-95m to access a cycle store, with the 95m distance relating to block M and highlighted yellow on the image above. Whilst these distances are noted, it is not considered that they would be so large that they would discourage people from using the cycle stores and there is a need to make an efficient use of the site. TfL has raised concerns regarding the cycle hub in block L on the basis that it would increase cyclist movements through the bus station, and has also

questioned whether the 3m wide pathway between it and the bus station boundary wall would be wide enough; officers have reviewed this and consider that the proposed location and width of the pathway would be acceptable. The council's Transport Policy Team has advised that overall the proposed cycle parking would comply with the London Cycling Design Standards, and if planning permission is granted on appeal officers would seek to secure it by way of a condition.

624. With regard to cycle hire, both Forest and Lime currently operate dockless cycle hire schemes in Peckham, with electric bikes and electric scooters available for hire. TFL has requested a contribution of £270,000 towards the expansion of its own cycle hire scheme which requires docking stations, together with land to be safeguarded within the development for a potential future docking station. As set out earlier in the report, given that the proposed development is not financially viable, priorities for mitigation must be identified, and the works to the bus station, along Hanover Park, McKerrell Road and Rye Lane are considered to be a higher priority in this instance. Land for a docking station could however be secured within the development, and officers would seek to secure this if planning permission is granted on appeal, together with details of where dockless bikes and scooters could be parked.

625. Car parking – Policies T5 and T6 of the London Plan require the proposed workspace and retail space to be car-free; policy P54 of the Southwark Plan sets out a number of requirements, including maximum parking standards for new homes and requirements for town centre parking.

626. The existing shopping centre car park contains 353 spaces including 22 Blue Badge spaces and nine parent and child spaces. It provides two hours free parking which is monitored using automatic numberplate recognition, and it is not restricted to shoppers using the supermarket. The TA sets out that the car park is generally busiest on Fridays between 1pm and 3pm and on Saturdays between 11am and 2pm. During busy periods the car park ranges from 85% to 100% occupied, but on occasions slightly exceeds 100%. Surveys carried out at the site showed that 32% of the people surveyed were only visiting the Morrisons store, 32% were only visiting the town centre, and 36% were visiting both Morrisons and the town centre. On-street car parking stress surveys which were undertaken for all streets within 200m of the site (McKerrell Road, Ciceley Road, Moncrieff Street, Raul Road, Cerise Road, and Marmont Road) showed that the permit holder bays are between 77-78% occupied.

627. The proposed development would provide 140 parking space for the new supermarket, including eight Blue Badge spaces (6%) eight parent / child spaces, and 20% of the spaces would have electric vehicle charging points. 140 parking spaces would also be available throughout the construction period in a temporary car park on the site. Both TfL and the GLA in its Stage 1 report have raised concerns that there would be too much parking on the site, and responses from local residents have been mixed; some are concerned about the reduction in car parking on the site, and others consider that less parking should be provided.

628. The supermarket car park in the completed development would be at basement level on the eastern side of the site, accessed from Hanover Park; it would be

connected to the supermarket by three large lifts leading up to the supermarket lobby. Parking would be free for two hours as is currently the case, with no return within two hours, and would not be restricted to people using the supermarket.

629. The applicant has advised that 140 car parking spaces is the minimum number of spaces which Morrisons would accept in order to agree to vacate the existing store. This level of parking is understood to be part of the contractual obligation between the applicant and Morrisons, and officers have asked to have evidence of this for clarity.

630. The supermarket is an important local facility and a requirement of the site allocation, therefore any reduction in parking spaces could impact not just upon the delivery of the supermarket, but on the delivery of the scheme as a whole. Given that 140 spaces would be a significant reduction compared to the existing situation, it would be restricted to two hours and it would not just be for the supermarket, officers consider that the proposed level of car parking would be acceptable in this instance. If planning permission is granted on appeal, officers would seek to secure two hours free parking per day with no return in 24 hours, together with a plan to show how the car parking would be monitored and reduced over time, and potentially repurposed as cycle parking or other sustainable uses.

631. Other than accessible parking which is outlined below, there would be no car parking for the new homes. As the site is located in a CPZ, future occupiers including of the non-residential uses should be prevented from obtaining parking permits and this could be secured through a s106 agreement. A car club space is proposed within the public realm which could also be secured through a s106 agreement, together with three years membership for every eligible adult living within the development and for each of the non-residential uses, in accordance with policy P54 of the Southwark Plan.

632. Accessible car parking – Policy T6.1 'Residential parking' of the 2021 London Plan requires the development to provide 10% accessible car parking spaces, with 3% to be provided from the outset and details of how the remaining 7% could be provided to be set out in a Parking Design and Management Plan. This would require a total of 87 accessible parking spaces for the proposed development, of which 26 should be provided from the outset and space identified for the remaining 61. Policy P55 of the Southwark Plan requires accessible car parking spaces up to a maximum of one space per wheelchair accessible home. In this instance there would be 83 wheelchair accessible homes, therefore a maximum of 83 accessible car parking spaces would be permitted under this policy. A Parking Design and Management Plan is appended to the TA.

633. The proposed basement carpark would contain five accessible parking spaces for Blue Badge holders living in the development, which would be separated from the supermarket spaces by entry-controlled bollards. In addition to this there would be six Blue Badge spaces at ground floor level within the public realm and whilst the TA sets out that these would be for residents or employees, it has subsequently been agreed that these would be for residents only.

634. The 11 accessible spaces would equate to 1.3% provision based on the total

number of homes, or 13.2% based on the number of wheelchair accessible homes. However, given that one of the spaces could also be used as a car club space, this would reduce the accessible parking to 1.1% of the total homes or 12% of the wheelchair accessible homes. This would be well below the London Plan requirement for 3% provision from the outset, and TfL has commented that this low level of accessible parking should be supported by accessibility improvements in the town centre, including routes to bus stops and the station, bus stop accessibility improvements, and a contribution towards providing step-free access at Peckham Rye Station.

635. In response the TA addendum sets out that it is expected that the development would fund the delivery of raised kerbs at the bus stops around the site, works to the bus station and improvements along Rye Lane. Officers have considered these matters and given the high PTAL and subject to the delivery of the accessibility improvements outlined above, this level of provision is considered to be acceptable. If planning permission is granted on appeal, officers would seek to secure a detailed Parking Design and Management Plan which should identify how additional accessible parking spaces could be provided in the future.

636. Travel plan – A workplace and residential travel plan has been submitted with the application which sets out measures to encourage sustainable modes of travel to and from the site. These include the appointment of a travel plan coordinator to implement and monitor the travel plan, the provision of a travel pack for residents and occupiers, cycle parking, and a cycle to work scheme. If planning permission is granted on appeal, officers would seek to secure the travel plan together with a monitoring fee of £2,790. TfL has raised concerns that the targets within the travel plan would not help to increase active and sustainable travel from first occupation. However, given the car-free nature of the development, the excellent accessibility of the site, and the quantum and type of cycle parking proposed, the proposed development would be expected to have a high active/public transport modal share from the outset.

Transport impacts conclusion

637. The proposed development would result in a significant reduction in car parking on the site which would align with sustainable transport objectives. Whilst there would still be 140 spaces for the supermarket, given the importance of this facility to the town centre and subject to the restrictions on its use as outlined above, this is considered to be acceptable in this instance. The number of vehicle trips to and from the site would decrease as a result of the proposal, although walking, cycling and public transport trips would increase. A number of measures would be required in order to mitigate the impacts of this, including a scheme of works to the adjoining bus station; officers are currently working on proposals with TfL and the appellant, and would seek to secure these works if planning permission is granted on appeal. The proposal would not deliver the required amount of wheelchair accessible parking on the site, but given the high PTAL, the proximity to a range of shops and services in the town centre and subject to accessibility improvements in the town centre, on balance this is considered to be acceptable. The ES concludes that the completed development would result in significant beneficial effects on non-motorised users within the site (pedestrians and

cyclists) in relation to severance, amenity, fear and intimidation. Subject to the delivery of the required mitigation measures identified above, officers concur with this assessment.

Air quality

638. London Plan Policy SI 1 as well as Southwark Plan Policy P65 seek to improve air quality with the site. They expect a development to achieve or exceed air quality neutral, and confirm that a scheme should not lead to a deterioration of existing air quality. Any shortfall in air quality standards on site must be secured of site through planning obligations or as a financial contributions.

639. With regards the proposed development, chapter 8 of the ES assesses the likely significant effects of the proposed development on air quality. Baseline monitoring surveys were carried out between August and November 2022 to establish the existing ambient pollutant concentrations at various locations within the study area, and the locations which were chosen are considered to be extensive and appropriate.

640. Nearby receptors have been identified, together with their relative sensitivity, and all of them have been identified as high sensitivity which officers concur with.

641. The site falls within the Peckham Town Centre Air Quality Focus Area. The applicant has provided an air quality assessment, and it was determined that the scheme would be air quality neutral. Measures to mitigate the impacts on dust and local air quality during the demolition and construction phase are proposed through a demolition and construction management plan, and are considered to be considered comprehensive and acceptable.

642. The supporting information has confirmed that all food and drink units across the site would be located on the ground floor, with risers terminating on the roof of the block so as to provide means of extraction. To ensure an acceptable impact with regard to potential cooking odours, a condition could be used, requiring details of extraction and ventilation to be submitted for approval. This would also ensure that the proposed food and drink units would have an acceptable impact in terms of air quality. A further condition would also be required in relation to the testing the emergency diesel generators, so as to limit potential impacts in terms of noise and air quality.

643. The air quality report considers the adjacent bus station and states that the results are difficult to replicate in air quality models. The air quality report has however, considered the impact and references issues such as annual mean NO_2 concentration monitoring from around the surrounding area, which includes locations near to the bus station.

644. The proposed impact at the adjacent bus station is less than areas such as the corner of Rye Lane and Peckham High Street and it is considered unlikely that there would be any air quality impacts at the facades of the development overlooking the bus station. The Council's Environmental Protection Team as

well as LUC have reviewed this document and did not raise issues with regards the impact upon the future residents.

645. The results have shown that there would be two exceedances of the annual mean nitrogen dioxide objective within 0.5m of Hanover Park. The report does however confirm that this is expected to reduce in future years through the implementation of more stringent vehicle emissions standards, and this would help to reduce the impact.

646. One element which could cause potential harm to the surrounding area is the ventilation exhaust from the proposed basement vehicle parking. This was raised by LUC during the assessment of the ES. It has further been considered by the council's EPT which does not expect the car park to impact upon the local surroundings in terms of NO_2. Conditions could also be imposed to ensure this.

647. It is noted that the submitted air quality report references connection to the Southeast London Combined Heat and Power (SELCHP) but as confirmed in other parts of this officer report, this may not occur. The submitted report also references the provision of a centralised energy plant but it also references that the heat network could instead be totally electrified (which would be an improvement in terms of air quality). As there is a level of ambiguity over what course of action would occur, a centralised energy plant or the creation of an electrified network, if planning permission is granted, a new air quality report would be required setting out what the actual impact would be. As such and with appropriate planning conditions requiring the submission of a new report, the scheme would be deemed to be in accordance with policy SL 1 of the London Plan and policy P65 of the Southwark Plan.

Ground conditions and contamination

648. Policy P64 of the Southwark Plan references contaminated land and seeks to address adverse effects on the natural environment such as soil, water, habitat and biodiversity. The effects of new development on the environment can be temporary, permanent and/ or cumulative and if these impacts are not identified at the design stage it can be much more difficult to rectify or add measures once a scheme is built.

649. Chapter 13 of the ES has considered the likely significant effects of the proposed development upon ground conditions and land contamination. The study area was 2km and existing/ former uses of the site have been considered and assessed. This includes an historical garage, historical and current electricity substations, existing buildings, as well the existing car park and petrol station.

650. The ES considers the proposed demolition, construction and operational phases of the development. The proposed works would also require a significant degree of excavation, and the new basement could affect local groundwater.

651. The ES confirms that there could be potential for contamination on the site and this would be both within the soils as well as caused by potential demolition works. For example, the proposed development would include the removal of the

petrol station and whilst this would not be replaced, there are petrol tanks on that part of the site. Mitigation measures would therefore be required so as to accommodate their removal, and this could be secured by way of a condition.

652. The ES also sets out that a comprehensive intrusive investigation would need to be undertaken and following this, a strategy prepared for dealing with any contamination identified. This would need to be undertaken on the full extent of the site including the areas where the petrol tanks would be removed, and this could be dealt with by way of conditions.

653. A Basement Impact Assessment has been submitted which confirms that if a contiguous piled wall is not feasible due to groundwater levels a different method of construction would be required. . This is therefore deemed to be in accordance with Policy D10 of the London Plan.

654. The submitted ES considers unexploded ordinance (UXO) on the site and concludes that there would be a limited risk of finding UXO. LUC commented on this issue, including its categorisation as short term/ temporary within the ES. Given the potential impacts, LUC consider that the impacts would not be short term or temporary.

655. The applicant has been made aware of this and understands the risk of UXO on the site is considered long-term and permanent. This issue could be addressed by way of a condition however, requiring a detailed UXO risk assessment to be submitted prior to commencement of works on the site. This would need to include details of mitigation measures and would ensure that any UXO is suitably removed by a qualified professional prior to works on the site commencing. This would ensure that there would be no long-term permanent effects as a result of UXO.

656. Overall, it is considered that any issues arising relating to land conditions and contamination could be addressed by way of planning conditions.

Flood risk and drainage

657. The proposed development would incorporate a variety of different street trees and landscaping which would help to manage surface-water run-off. The application also proposes the use of rain gardens for Sustainable Urban Drainage (SUDs).

658. 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. London Plan policy SI 12 as well as Southwark Plan Policy P68 state that a development must not increase flood risk and should be designed ensuring that it is safe and resilient to flooding.

659. The site is located within Flood Zone 1 which indicates a low probability of flooding from rivers and the sea, but it is located in a Critical Drainage Area. There would be a small area of ‘ponding’ with up to high flood risk associated with surface water flooding, which occurs in the centre of the site.

660. With regards the 'ponding', this would occur where Ayelsham Gardens would be located. It would also impact upon the external ground levels around Block F. The submitted report has suggested that ground levels be lowered to ensure that should any surface water pond occur within this location, that it 'ponds' within the gardens and away from any building. It is noted that there would be other areas where ponding could occur such as between Blocks J and G. There could also be a small area of ponding where the replacement supermarket is proposed, to the east of the site.

661. Surface water flood risk does not appear to have significant connectivity to areas outside of the site boundary (i.e. the areas at risk are within the site and do not comprise flow paths). Any potential impacts could however, be mitigated through a condition for a drainage strategy.

662. It is noted that the application includes a basement which would be located under the proposed supermarket to the east of the site. Should any ponded water from excavations occur, any water would be pumped into a temporary holding tank located within the site to remove suspended sediment before being discharged to surface water or to the ground. This would be subject to appropriate consent from the Environment Agency where required. The submitted Flood Risk Assessment states that once the basement is built, it would not result in a rise in groundwater locally, and that it would be very unlikely that groundwater would emerge at the surface. A site specific investigation would need to be carried out to confirm that the proposed basement would not extend beneath the water table surface, but this could be controlled by a planning condition. It is also confirmed that the greenfield runoff rate would be in line with requirements and would be considered acceptable.

663. Letters of objection have raised concern in reference to the impact upon the River Peck. The River Peck can be considered a 'lost' watercourse but is located approximately 370m south of the site and is culverted/ routed underground. Given the distance from the site and as the site is not located within a ground water Source Protection Zone (SPZ), the development should not cause undue harm to this watercourse.

664. The GLA initially raised concerns with regard to SuDS and the level of information submitted. Following further discussions with the GLA it is been agreed that this matter could be addressed by way of conditions. Additional information was submitted during the course of the application which has been reviewed by the council's Flood Risk and Drainage Team, and this team is satisfied that the proposal would not result in any adverse flooding impacts, subject to a number of conditions.

Sustainable development implications

665. Southwark Plan Policy SP2 references mitigating and adapting development to climate change whilst 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.

666. 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.

667. The application has sought to address the policy requirements of the current development plan relating to energy and sustainability and take account of the revised Building Regulations in Part L (conservation of fuel and power) and new Part O (overheating) especially. The submitted report outlines strategies for both residential and non-residential areas.

668. The supporting information has not specifically referenced the re-use of the existing building, and officers raised this during the course of the application. Given the size and siting, the re-use of the existing building could prove prohibitive as it could restrict the layout of the site and the need to improve connections across the site. In response the applicant drew attention to the energy and sustainability measures which would be implemented, and which are expanded upon below.

Be Lean (use less energy)

669. The 'Be Lean' stage of the Mayor's Energy Hierarchy requires carbon emission savings against 2021 Part L Building Regulations to be achieved by passive measures built into the design of the development, including orientation and site layout, natural ventilation and lighting, consideration (and technical modelling) of the impact of chosen building materials in terms of thermal mass and insulation and air tightness, and the extent (and technical specification) of glazing and use of shading, among others.

670. The scheme would achieve a site-wide reduction of 23% in carbon emissions

which exceeds the 10% requirement (for residential) and 15% for non-residential energy efficiency measures as set out in Policy SI 2 of London Plan.

Be Clean – low carbon energy supply

671. The main heat network near to the site is the Southeast London Combined Heat and Power (SELCHP) but there is no direct connection to the site at the Aylesham Centre. The ES states that the London Heat Maps shows that the SELCHP is proposed to be extended to the site as part of future works. This has been confirmed by the heat network operator, however, there is currently no information on the start and expected completion date for the proposed heat network extension. The routes of the network are also subject to change. As such, each block would be provided with air source heat pumps.

672. An updated Energy Assessment Statement was submitted in March 2025. This has addressed initial concerns which were raised by the GLA regarding the need to minimise the number of energy centres within the proposed development. The Be Green section of the Energy Strategy confirms that there would be three energy centres for each phase (six in total) which would provide all of the heating for the development.

673. The GLA has requested that a condition requiring the development to connect to the proposed SELCHP if it comes close to the site in the future, with a draft connection agreement be provided to the council prior to commencement of works. The ES considers the potential for this, and shows where this could reasonably be integrated into the development in the future; this could be secured as a planning obligation.

Be Green – renewable energy generation and storage

674. The ‘Be Green’ stage relates to using renewable energy technologies as a way to supply energy to a development.

675. As referenced above, the proposed homes would be supplied with hot water from three energy centres per phase (six in total). For the non-domestic areas, the use of high-performance heat pumps is proposed, and photovoltaic panels (PVs) would be provided on the roofs to provide electricity.

676. The total regulated emission for the site would be 309.8 tonnes of CO2 per year. This would be a saving of 330.5 tonnes of CO2 per year which would equate to a 40% saving.

677. The GLA requested confirmation that the potential for renewable energy has been maximised, as there were concerns regarding the extent of PVs. The details of the solar panels were updated during the course of the application and the GLA considered this to be extensive. This did not however, consider features such as canopied PV panels. The GLA has therefore requested that this be re-

visited and addressed through a condition.

Cumulative Site-Wide Savings

678. Based on the measures outlined above, the proposed development would achieve an overall regulated carbon dioxide emissions reduction of 63% over Part L of the Building Regulations (2021). For the non-residential properties, the scheme would receive an on-site reduction of 37% for the commercial properties and 65% for the residential properties. This would equate to 23% be lean, 0% be clean, 40% be green and would lead to a total site wide saving of 518.6 tonnes of CO2. In accordance with London Plan policy SI2 and Southwark Plan policy P70, the shortfall in carbon reductions to meet net zero would be met by an off-site payment in-lieu, calculated on the basis of the remaining emissions per annum totalled across a 30-year period. This has been calculated at 9293.4 tonnes of CO2 which would equate to £882,873. This could be secured via a planning obligation if planning permission is granted on appeal The application has demonstrated that all steps have been taken to reduce carbon emission in line with the energy hierarchy.

Carbon offset contribution

679. To achieve net carbon zero, the proposal would be required to offset 8,206 tonnes of carbon for the residential properties and 1,087 tonnes of carbon for the non-residential properties. This equates to a financial contribution of £808,231, + £103,292 = £911,523 . This total would need to be secured through the S106 agreement. The detailed calculation is as follows:

Cumulative Carbon Emissions Over 30 Years:

- Residential: 283.6 × 30 = 8,508 tonnes CO_2
- Non-Residential: 36.2 × 30 = 1,087 tonnes CO_2

Carbon Offset Payments (at £95 per tonne CO_2):

- Residential: 8,508 × £95 = £808,231
- Non-Residential: 1,087 × £95 = £103,292

- Total Payment for the whole site: £808,231 + £103,292 = £911,523

Be Seen – monitoring, verifying and reporting energy performance

680. Policy SI 2 of the London Plan introduces new ‘be seen’ requirements to monitor, verify and report on energy performance. Clauses could be included in a s106 agreement to verify the actual carbon savings delivered by the development, with the potential for an adjustment to the carbon off-set green fund contribution if required.

Whole Lifecycle Carbon (WLC)

681. In accordance with policy SI2, a Whole Life-cycle Carbon (WLC) assessment has been submitted. This has been assessed by the GLA who initially asked for further information concerning the retention of existing buildings and structures, quantities of materials, assumptions made within the document, and end of building life scenarios. This was subsequently submitted and accepted by the GLA, which has recommended a condition requiring the submission of a post-construction assessment to report on the development's actual WLC emissions.

682. A number of objections to the application have made reference to a 60-year assessment time frame (assumed building life expectancy) which is included within the WLC assessment, on the basis that a 60 year life span for the development is too short Whilst this is noted, the 60 year assessment period is set out in the Royal Institution of Chartered Surveyors (RICS) guidance document “Whole life carbon assessment for the built environment”, and the GLA has confirmed that this is the correct approach. The submitted WLC assessment confirms that the tests were carried out against the 60 years figure so as to enable comparability between whole life carbon results for different projects. The referenced 60-year figure is therefore considered to be acceptable, and it is noted that this is for assessment purposes only and does not indicate that the development would only be in place for 60 years.

Circular economy

683. 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.

684. A Circular Economy Statement (CES) has been submitted with the application setting out the approach to meeting circular economy targets in accordance with London Plan Policies D3 and SI7, Southwark Plan Policy P62 and GLA guidance.

685. The report states that the six circular economy principles (such as designing out waste) have been considered, and measures such as ensuring that 95% of non-hazardous construction, demolition and excavation materials are diverted from landfill, recycled or re-used would be implemented. It also sets out a number of other measures, such as the use of lightweight partitions so that they could be removed in future if there is a requirement for a change in the layout or function of the buildings.

686. The GLA has reviewed the CES and initially asked for further information, including further justification on the requirement for demolition and additional details on maintenance and end of building life strategy. The applicant therefore submitted an updated circular economy report which the GLA is satisfied with, subject to a condition for a post-completion review.

Overheating and cooling

687. Policy SI4 of the London Plan and policy P68 of the Southwark Plan set out the cooling hierarchy which should be followed when developing a cooling strategy for new buildings. A report carried out by ME Engineers has been submitted, which confirms that the site is within an area at high risk of overheating. The report refers to measures such as openable windows, taking into account the potential for noise and air quality impacts. However, in scenarios with low wind speeds or wind directions that do not facilitate adequate airflow through the windows due to their location, or spaces where windows cannot be opened due to acoustic considerations, the overheating report demonstrates that all spaces for all buildings would meet the necessary overheating assessment requirements by installing Mechanically Ventilated Heat Recovery systems (MVHR). These systems are not air conditioning, but they ensure that the associated flat would remain cool and would not overheat. The use of such units would ensure that the flats would remain cool in most wind flow scenarios and would be adaptable to heatwaves and climate change. This is deemed to be in compliance with London Plan Policy SI 4. Of note is that all homes within the development would have openable windows but some would be minimally restricted due to issues such as wind concerns. These flats would have MVHR units so as to mitigate the impact.

688. A letter of objection refers to the use of MVHR systems on the basis of energy consumption and carbon emissions. However, the submitted energy report has stated that these units would be of a high efficiency and that they would help provide the necessary additional cooling mitigation. The use of these systems is therefore accepted.

Southwark Council's Climate Emergency Declaration

689. Objection letters have made reference to Southwark Council's Climate Emergency Declaration and how the scheme has not considered/ would not be in compliance with this. As shown above, the development has considered the impact that it would have in terms of sustainability and carbon measures, and would be in accordance with the relevant policies. Moreover, a number of sustainable travel measures are proposed, such as cycle parking, electric vehicle charging points and a travel plan.

BREEAM

690. The submitted Circular Economy Statement sets out the BREEAM pre-assessment results, which show that the proposed development is targeting an ‘excellent’ rating for the commercial units. This would be in compliance with Southwark Plan Policy p69. A planning condition could be imposed to secure a post-construction assessment demonstrating that the targeted BREEAM score has been achieved.

Water resources

691. Policy SI 5 of the London Plan 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 and water efficient fittings to seek to limit water use to less than 105 litres per person per day. Thames Water has requested that a number of conditions and informatives be imposed on any subsequent planning permission.

Sustainable design and construction

692. Sustainable design and construction has been considered within a Sustainability Statement, which summarises the various measures which would be incorporated to reduce carbon emissions from the development. This document also considers other elements such as the health and well-being of the building occupants and BREEAM measures.

693. The three overarching objectives for sustainable development set out in the NPPF relate to economy, society, and the environment. The proposed development would replace an existing car park and commercial space and new homes and this would create jobs during construction, within the completed development ,and would increase spending in the local area. With regard to the environment, the sustainability measures have been outlined above, and a significant amount of new tree planting, landscaping and public realm would be delivered. The number of vehicles travelling to and from the site would also reduce.

Wind microclimate

694. Policy D8 of the London Plan 'Public realm' advises that a development should provide appropriate shade, seating and areas of sunshine. It advises that temperature as well as wind conditions should be considered, to encourage people to spend time in these spaces. London Plan Policy D9 requires all tall building proposals not to cause changes to the wind environment which would compromise comfort and the enjoyment of open spaces around the building and in the neighbourhood. Southwark Plan policies P14, P17 and P56 also require wind effects to be taken into consideration when determining planning applications.

695. A Wind Microclimate Report has been submitted and forms part of the ES. It provides details of wind tunnel testing which has been carried out by Windtech Consultants, and is based on the Lawson Comfort Criteria which provides different categories of wind speeds for different activities (such as sitting out, walking and cycling). The report considers the following scenarios:

- CONFIGURATION 1: The Existing Site with Existing Surrounds (the Baseline Conditions)
- CONFIGURATION 2: Interim Phase of the Proposed Development with Existing Surrounds
- CONFIGURATION 3: Completed Proposed Development with Existing Surrounds;

- CONFIGURATION 4: Completed Proposed Development with Existing Surrounds and Proposed Landscaping

696. In configuration 1 the report confirms that wind conditions in and around the site would be acceptable. In configuration 2, a number of balconies within the proposed development and one area within the communal amenity space in the podium block would exceed the recommended comfort criteria, and would therefore require additional mitigation such as enhanced balustrades and landscaping measures. Wind conditions at all of the adjacent bus stops would be suitable for pedestrian use (i.e. standing) throughout the year. In configuration 3 some 43 balconies
would exceed the comfort criterion during the summer period and this would be 40 balconies for configuration 4. Twenty seven (27 locations) on the proposed terraces for both configurations would exceed the comfort for the summer period and because these would occur in the majority of the proposed terraces, mitigation measures would be required. 13 outdoor areas to the flexible retail/ play areas would also be above the recommended criterion. Conditions at bus stops around the site would be acceptable under these scenarios.

697. LUC in its review of the ES commented on wind microclimate, including a requirement for a balustrades varying in height (up to 1.5m) and also reviewed some additional Computational Fluid Dynamics (CFD) testing which was carried out. . Further details with regards the balustrades and soft landscaping would be required and it is considered that these matters could be addressed by way of a condition, and with these in place, the proposed development would be in compliance with policies P14, P17 and P56 of the Southwark Plan and policy D9 of the London Plan.

Fire safety

698. Policy D12 of the London Plan requires all major development to submit a Fire Statement, addressing all criteria outlined by the policy. Paragraph 3.12.9 of policy D12 explains that Fire Statements should be produced by someone who is "third-party independent and suitably-qualified". The council considers this to be a qualified engineer with relevant experience in fire safety, such as a chartered engineer registered with the Engineering Council by the Institution of Fire Engineers, or a suitably qualified and competent professional with the demonstrable experience to address the complexity of the design being proposed. This should be evidenced in the fire statement. The council accepts Fire Statements in good faith on that basis. The duty to identify fire risks and hazards in premises and to take appropriate action lies solely with the developer.

699. A Fire Statement has been submitted which was prepared by a suitably qualified third-party assessor, Introba. It advises that the authors include a Fire Engineer with two years' experience and an Associate Member of the Institution of Fire Engineers (IFE). Another author is registered with the Engineering Council and a Member of the Institution of Fire Engineers (MiFireE). The statement provides details relating to means of escape and evacuation strategy, passive and active fire safety measures, and escape from both ancillary as well as commercial

accommodation and residential.

700. The statement sets out the fire safety measures proposed, including 1-2 fire fighting shafts depending on the height and floor area of the building, wet and dry risers, escape routes and distances, parking for fire engines and access to fire hydrants. Evacuation strategies are also considered, taking into account the range of different uses and activities which would take place in the development. All cycle stores, plant rooms and bin stores would be fitted with fire resistant doors and smoke alarms, and given that electric bikes could be stored in the buildings, an automatic fire suppression and smoke control system would be required.

701. The Health and Safety Executive (HSE) has advised that the submitted Fire Statement has identified the required/ expected design standards for the proposed development. They had no comments and are satisfied with the proposal in respect of fire safety.

702. London Fire Brigade (LFB) were consulted on the application and have raised a number of concerns, including the location of kitchens within the flats relative to the main escape door, the proposed stay-put and evacuation strategies, and the siting of post boxes within a final escape route. These matters are still being considered by the applicant, and Members will be updated through an addendum.

Digital connectivity

703. London Plan policy SI6 on digital connectivity infrastructure requires the provision of sufficient ducting for full fibre connectivity to all end users in new developments. Southwark Plan policy P44 requires delivery of fibre to the premises broadband or equivalent technology for future occupants and users. The scheme should include provision for full fibre connectivity to ensure all community and residential end users can benefit.

704. There are no details regarding digital connectivity submitted with the application and this was raised with the applicant. They have since confirmed that site wide connection to full fibre would be agreed and could be subject to condition. As such, a compliance condition could be attached as to ensure each building has fibre connection in line with the submitted information. With this in place, it would have an acceptable impact and be in compliance with this policy.

705. With regard to TV, radio and telecoms networks, Arqiva are responsible for providing the BBC, ITV and the majority of the UK's radio transmission network. They are also responsible for the integrity of re-broadcast links. Arqiva were consulted to ensure that the proposed development would not cause undue harm to any of the above. Arqiva have considered/ assessed the proposed development and have raised no concerns with regards the impact upon TV and radio signals.

Archaeology

706. Southwark Plan policy P23 seeks to conserve any archaeological resources located within the site and chapter 12 of the submitted ES assesses the likely significant effects of the proposed development upon archaeology. The applicant's Archaeologist has provided a written scheme of investigation for the monitoring of a limited amount of initial investigations to be undertaken on the site prior to the determination of the application, however, this has not taken place, and has not been acknowledged within the ES or other documentation. Whilst this is noted, the council's Archaeologist has advised that the assessment is acceptable, and in the absence of these pre-determination investigations, a number of conditions for archaeological works would be required.

707. Due to the size of the site and its town centre location a programme of archaeological public engagement works would need to accompany the archaeological works, so as to comply with policy P23 of the Southwark Plan.

708. LUC in its review of the ES made a number of comments relating to archaeology, including categorisation of different heritage assets and the potential effects, and requested further information. The council's Archaeologist has reviewed this however, and as set out above has recommended a number of conditions.

Socio-economics and health

709. The Southwark today section of the Southwark Plan sets out useful background into the socio-economics of the borough. It advises that with regard to indices of deprivation, Southwark has seen an improvement in its ranking compared to other local authorities in England, but the borough remains one of the most deprived in the country. The supporting text to policy SP5 sets out that just over 8% of residents in the borough live in communities ranked in the 20% most deprived in England, and just over 4% live in communities ranked in the 20% least health deprived.

710. Socio-economic impacts are considered in chapter 6 of the ES. It sets out that the local area (Rye Lane and Peckham wards) has a higher number of people aged 15 and under compared to the Southwark figure, but lower than the London-wide figure. The most common ethnicity in the local area is white, followed by Black, Black British, Black Welsh, Caribbean or African (37.8%) which is higher than the Southwark figure of 25.1% and the London-wide figure of 20.7%. Unemployment levels and housing overcrowding in the local area are higher than the Southwark and London-wide figures.

711. Many of the objections to the application raise concerns regarding socio-economic impacts, such as insufficient affordable housing meaning that local people would not be able to live in the development, impacts upon the existing businesses who may not be able to afford to remain in the development, and indirect impacts such as increased house prices and rents in the locality potentially pushing out existing residents and businesses and undermining the vitality and diversity of the area. Southwark Law Centre has commented that the application fails to consider and therefore mitigate these indirect impacts, and does not therefore meet the public sector equality duty.

Demolition and construction

As noted in Business Relocation section of the report, there would be temporary displacement of existing uses following the closure of the shopping centre. The ES notes that if any businesses do not relocate locally or they reduce their operations, there may be a reduction in employment. Nevertheless, it also notes that once the BRS has been implemented, the magnitude of impact on the site's existing occupants and businesses would be low, resulting in a temporary minor adverse effect. Officers consider that this would only be the case provided robust measures to support the independent businesses are secured through a legal agreement, and the proposed and required measures have been set out in detail earlier in the report.

712. It is expected that the proposed development would create 271 construction jobs, and the ES considers that this would also generate beneficial indirect construction effects, such as spending by construction workers in the local area. As referred to earlier in the report, the application sets out that employment and training schemes would be implemented which would be of benefit to the local community, particularly younger people. If planning permission is granted on appeal officers would seek to secure these measures, including a proportion of jobs and training for unemployed borough residents. The ES notes that there would be fluctuations in the number of construction workers on-site over the course of the construction programme, and therefore spending in the local area would also fluctuate. The ES concludes that whilst spending in the local area would be positive, its impact would be negligible when considered at a regional level.

Completed development

713. The ES notes that the proposed development is estimated to deliver 510-660 jobs within the completed development, compared to 410-550 jobs as existing. The proposal could therefore result in a net loss of jobs, but the ES considers that this is not likely and that the effect on the local economy would be negligible.

714. In terms of housing delivery, the proposal would contribute 36.8% to the council's annual housing target and this would have a high magnitude effect at the local level and a medium magnitude effect at borough level. The ES categorises these effects as major beneficial and significant, but officers have concerns that the low level of affordable housing proposed and the lack of a firm commitment for the delivery of CLT homes, an explicit requirement in the site allocation, are such that there would not be sufficient public benefits, and it would not outweigh the heritage harm which would occur as outlined earlier in the report. Whilst it is recognised that the ES does not consider the potential indirect effects of increased house prices and rents in the local area following the proposed development, the provision of affordable housing and affordable commercial rents is one way in which large-scale developments such as this can help to mitigate these impacts and imbed the benefits in the local community. In this instance, it is not considered that the benefits would be sufficiently imbedded in the local community owing to the low level of affordable housing and lack of CLT homes.

715. With regard to education, the ES identifies that there is surplus capacity in both local primary and secondary schools, and that the impact of school-age children living in the development is likely to have a low magnitude effect. Officers concur with this conclusion, and note that one primary school in Peckham has recently been identified for closure owing to insufficient numbers of children on the school roll.

716. The ES considers the development's impact on local open space and playspace provision, and that it would not meet the overall total playspace requirements across the scheme owing to a shortfall in the 12+ provision. As set out earlier in the report, this could be mitigated by way of a planning obligation in the event that planning permission is granted on appeal.

717. As noted earlier in this report, Peckham suffers from high levels of crime. The proposed scheme would be designed to provide opportunity for natural surveillance and crime prevention measures, and no objections have been raised by the Metropolitan Police Designing Out Crime Officer. Overall, there would be minor beneficial impact by reducing opportunities for local crime such as anti-social behaviour.

718. The ES advises that the new homes are estimated to generate approximately £13.1m annually in additional spending; owing to a similar number of existing and proposed jobs spending by employees is likely to be similar to existing levels.

719. Health Impact Assessment – In addition to information provided within chapter 6 of the ES, the application is accompanied by a Health Impact Assessment (HIA) and HIA Addendum which consider the potential impacts of the proposed development on human health. Policy SP5 of the Southwark Plan 'Thriving neighbourhoods and tackling health inequalities' highlights the need for development to support tackling health inequalities whilst creating thriving neighbourhoods. It sets out a number of ways in which this will be achieved, including building quality new homes to help people to live healthier lives, delivering a safer walking and cycling network to address the climate emergency, and reducing health inequalities by improving the economic wellbeing, physical and mental health of our communities.

720. The applicant's HIA advises that the rate for unemployment in the local area, which is defined as the Rye Lane and Peckham wards, is higher than the average rate for the borough and London. It also identifies that life expectancy for males in the local area is lower than the borough and London-wide figures, the prevalence of long-term physical or mental health conditions in the local area is higher than the borough and London-wide figures, and the rate of overcrowding across all tenures of housing in the local area at 15% is significantly higher than the borough and London-wide figures of 12% and 11%. The HIA identifies the nearest health facilities to the site, which are the Maudsley Hospital (1.4km to the west), and there are six GP surgeries within a kilometre of the site.

721. The HIA examines the impact of the proposed development and concludes that it would likely have an overall positive impact upon health. Positive impacts are

identified in relation to a number of areas, including the provision of new housing, the delivery of mixed-use spaces, open space and play-space, accessibility and active travel, and crime reduction and community safety. Some neutral and negative effects have also been identified, including temporary negative impacts upon GP provision, impacts relating to noise, vibration and air quality during construction. The HIA identifies mitigation for these negative impacts, through Community Infrastructure Levy payments towards GP provision and a construction management plan to minimise construction impacts.

722. Officers have reviewed the HIA and generally concur with its findings, although it is noted that the reduction in affordable housing would not offer the extent of public benefits expected in the development plan, in an area experiencing high levels of deprivation and overcrowding.

723. The impact upon healthcare provision, including GP provision, is highlighted by the NHS London Healthy Urban Development Unit in response to the application. This consultee has requested a contribution of £72,000 towards the capital costs of mitigating this impact, with a request that this is secured by a s106 contribution rather than CIL on the basis that a s106 contribution relates more directly to the proposed development. Whilst this is noted, CIL money can be spent on providing the infrastructure required to support development, and this includes health care facilities. As such the NHS contribution has not been requested in this instance.

724. Overall the socio-economic effects set out in the ES are noted. However, officers consider that the impacts upon the existing independent businesses would only be acceptable subject to a robust Business Relocation Strategy, and that the low level of affordable housing proposed and lack of CLT homes are such that the heritage harm identified earlier in the report would not be sufficiently mitigated.

Planning obligations (S.106 agreement)

725. London Plan policy DF1 and Southwark Plan policy IP3 advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. These policies are reinforced by the council's Section 106 and Community Infrastructure Levy SPD (July 2025) which sets out in detail the type of development that qualifies for planning obligations. The NPPF which echoes the Community Infrastructure Levy Regulation 122 which requires obligations to be:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development

726. As part of the appeal process the council will need to set out which planning obligations it considers are necessary in order to mitigate the impact of the proposed development. Having reviewed the application officers consider that the planning obligations set out below would be required. Of note is that the applicant's Financial Viability Appraisal does not identify an amount set aside for planning obligations apart from £880,000 as a carbon off-set contribution. Given that the proposed development would not be financially viable, there is therefore

a question mark as to whether it would be able to deliver all of the required mitigation. As set out earlier in the report, the transport priorities are considered to be works to the bus station, to the cycle route along Rye Lane, and works to Hanover Park and McKerrell Road.

Planning Obligation	**Mitigation Proposed**
Phasing plan	Development to be carried out in accordance with an approved phasing plan
Demolition and construction management plans	To be submitted for approval and the development carried out in accordance with the plans
Demolition and construction management plans monitoring fee	To be confirmed
Affordable retail space for independent businesses operating on the site	Provision of 10% affordable retail space to be provided on-site, with details of the fit out, rent levels and service charge to be agreed.
Access to a property agent and legal support	For the independent businesses on the site, including the hand carts.
Provision of temporary retail space at affordable	For the independent businesses wishing to remain on the site, including the hand carts.
Business relocation fund	£200,000 to support the independent business on the site
Affordable housing	12% affordable housing by habitable room within the social rented and shared ownership tenure, comprising 77 affordable homes (50 social rented and 27 intermediate)
Affordable housing monitoring fee	£150 per affordable home
Affordable housing monitoring clauses	To enable the delivery of the affordable housing to be

	monitored.
Affordable housing review mechanisms	Early, mid and late stage viability reviews, up to 50% of the habitable rooms
Wheelchair homes	Clauses to secure the wheelchair homes, marketing provisions and level of fit-out.
Archaeology contribution	£14,391 (Tier 2)
Biodiversity Net Gain provisions	£12,874 monitoring fee •Biodiversity Gain Plan and final metric and pre and post-development plans. •Habitat Management and Monitoring Plan, •A GIS shape file polygon of the BNG to be secured. This should include meta data or an attribute table which sets out the habitat type, as defined in the statutory metric, and a clear indication of whether the units are habitat, hedgerow or watercourse.
Employment during construction	232 sustained jobs for unemployed borough residents, 232 short courses and 58 construction industry apprenticeships, or pay the Employment and Training Contribution for any shortfall as set out in the s106 SPD. Details of measures to ensure that people sharing protected characteristics can fully engage with these opportunities.
Employment within the completed development	88 sustained jobs or meet any shortfall through the Employment in the End Use Shortfall Contribution as set out in the s106 SPD. Details of measures to ensure that people sharing protected

	characteristics can fully engage with these opportunities.
Local procurement	During construction
Delivery of the supermarket before the existing supermarket is demolished	To ensure continuous trading
Delivery of the retail space before occupation of a proportion of the private homes	To ensure the delivery of the retail space
Provision of 10% affordable workspace	Rent on the affordable workspace to be £27 per square foot (index linked) inclusive of service charge for a 30 year term. This currently equates to a 25% discount on market value.
Provision of an affordable workspace strategy	To ensure that it is operated by an affordable workspace provider and properly marketed as affordable workspace. Details of fit-out to be provided.
Play space contribution for the 12+ age group	£113,100
Tree planting strategy	£4,000 per tree not planted
Bus station improvement works	A scheme of improvement works to Peckham bus station to be agreed with TfL and funded and delivered by the applicant prior to the occupation of any part of the development.
TfL bus accessibility contribution	£80,000 for works along Hanover Park/Rye Lane (countdown facilities and shelters) to mitigate the under-provision of on-site accessible car parking.

Clifton Estate Route	Details of a pedestrian and cyclist route to be funded and delivered by the developer from the development to the Clifton Estate, if deemed to be acceptable following consultation with affected residents.
Highway works	Pre-commencement joint highway condition survey of streets and drainage gullies. Hanover Park • Vehicle access junctions to be at least 25m centre to centre. • Any narrow sections of pavement must be widened to at least 2.4m using land on the development side (if appropriate) and these strips of land to be offered for adoption to become public highway. • Resurface the full width of the carriageway from the junction with Rye Lane to its end. • Delivery of the off-site highway works described in the planning application, subject to consultation and agreement with TfL.

	• Installation of drainage gullies and connection pipes at the higher side of any raised intersection tables or entry features. • Hanover Park lies in both Heritage and Town Centre designation areas; clauses required to repave the footway fronting the development site using 750mm x 600 x 75mm Yorkstone or Sandstone paving slabs for the Heritage section and 750mm x 600 x 80mm silver grey granite slabs for the Town Centre section. • For both sections above, install new 300mm wide silver grey granite kerbs. • Tree planting and species to be in accordance with Southwark Streetscape Design Manual Rye Lane

	• Rye Lane lies in a Heritage Area; repave the footway fronting the development site using 750mm x 600 x 75mm Yorkstone or Sandstone paving slabs and 300mm silver grey granite kerbs. • Resurface the full width of the carriageway from Peckham High Street to Hanover Park. McKerrell Road • Resurface the full width of the carriageway • The proposed refuse truck turning area should be offered for adoption. • McKerrell Road lies in a Town Centre designation area; repave the footway fronting the development site using 750mm x 600 x 75mm silver grey paving slabs. General - All footways should have a clear passing width of a minimum of 2.4 metres. Works to be completed prior to the occupation of the development (potentially phased delivery)
Rye Lane cycle	£226,000

route contribution	
New street signage/ replacement of existing signage/ wayfinding information. (TFL)	£22,000
CCTV	Provision of 2sqm of roof space and access for new CCTV. £193,182.93 to mitigate impacts upon the council's CCTV network and to provide additional CCTV due to increased numbers of people using the site.
Servicing bond	£2,790
TfL cycle hire membership	Two years free cycle hire business accounts for commercial occupiers and 3 years free membership per household for the new homes.
TfL cycle hire expansion contribution	£270,000 to be paid in the event that
On-site space for e-bikes (including TfL cycle hire) and e-scooters	Details of suitable space to be provided and safeguarded within the development.
Car club membership	3 years membership for each eligible household and business within the development
Car club bays	Delivery of one on-site car club bay
Electric vehicle charging point	To be provided in accordance with the application details. 20% of spaces to be provided with active charging points and 80% with passive provision.

Parking permit exemption	Future residents and would be prevented from obtaining parking permits for the surrounding streets
Carbon off-set fund	£911,525
Future-proofing for district heating network	To enable the development to connect to future district heating networks if deemed feasible
Be Seen – on-going monitoring of carbon savings and post-installation review	Post-construction monitoring and reporting of each block.
Travel plan monitoring	£2,790
Public access through the site	27/4 access required.
Estate management plan	Detailing how the public realm would be managed, including litter, landscaping, safety and security.
Post-installation review of energy measures installed	Review to verify the carbon savings delivered with an adjustment to the carbon off-set green fund contribution if required
Make-good side elevation of Jones and Higgins building	To ensure the that the exposed flank wall would have an acceptable appearance.
GLA mortgagee in possession clauses	Relating to the enforceability of obligations
Total value of financial contributions	£2,054,622.93

727. In addition to the above, officers recommend that the legal agreement should include clauses requiring some of the intermediate homes to be delivered as community land trust homes as required by site allocation NSP74. This would need to include an agreed method for valuing these homes, given that CLT homes should be linked to local incomes. The application does not currently

propose any CLT homes therefore all of these details would need to be agreed as part of the appeal process.

728. One supporter of the application has commented that s106 money should be spent on a project to reintroduce Peckham Lido. The Lido is located in Peckham Rye Common to the south of the site, but has been closed and covered over for many years. There is a crowd funded project to reinstate it and whilst this is noted, s106 contributions are required to mitigate any impacts arising from the development and in this instance it is not considered that this would comply with the criteria.

Mayoral and borough community infrastructure levy (CIL)

729. 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.

730. The site is located within Southwark CIL Zone 3, and MCIL2 Band 2 Zone. Based on the GIA obtained from Accommodation Schedule dated Dec-24, the gross amount of CIL is £15,270,228.06 (pre-relief). Subject to the correct CIL Forms being submitted (on time), CIL Social Housing Relief of approximately £1,128,342.20 can be claimed for a number of types of affordable housing. Thus, **the resulting CIL amount is estimated to be £14,141,885.86 (net of relief)**. It should be noted **that this is an estimate, floor areas will be checked** when related CIL Assumption of Liability and Relief Claim Forms are submitted, after planning approval has been secured. It should be noted that Southwark CIL Social Housing relief can only be granted if the affordable housing provided meets the relief criteria set out in regulation 49 (as amended by the 2014 Regulations), the 2015 Regulations and the 2020 (No. 2) Regulations).

Community involvement and engagement

731. With the exception of the petrol station which is owned by Morrisons, the applicant purchased the site in 2021 and thereafter entered into pre-application discussions with the council and carried out numerous public engagement and stakeholder activities. The pre-application engagement is set out in a Statement of Community Involvement (SCI) which was submitted with the application. The requirements in this respect are set out in the council's adopted SCI.

732. Of note is that part-way through the pre-application process there was a pause in the discussions, whilst the applicant considered feedback received from the council, the local community and other stakeholders. After this a new architect was appointed and the pre-application discussions and public engagement activities resumed.

Statement of Community Involvement:

733. A Statement of Community Involvement and engagement summary have been submitted with the application, detailing the pre-application consultation undertaken with key stakeholders and the local community. The SCI confirms that the following was carried out before the application was submitted:

• Outreach – Meeting with community stakeholder groups and organisations
• Drop-in session – A planned and advertised public consultation event allowing people to pose questions directly to the project team and provide feedback.
• Door-knocking session – Initiation of direct contact with local residents and business owners by members of the project team.
• Community Champions Panel - A group of local people with a range of lived experiences, requirements and support needs. The Panel met monthly between February and May 2024 to discuss and inform the proposed redevelopment of the site.
• Community Information Session – A design and planning-led interactive presentation dealing with set specific features of the development process. The themes presented and discussed during these meetings were identified from stakeholder meetings and consultation feedback.
• Newsletter – A printed flyer distributed to 8,300 local addresses, promoting the consultation process and upcoming events.
• News advert – Promotion of the consultation/upcoming events in local press outlets.
• E-newsletter – A designed email sent to all individuals and groups who had signed up to the mailing list.
• Masterplan presentation – An interactive presentation given in-person by members of the design and project team in December 2022.
• Pop-up session – An informal consultation activity held to engage with local residents, shoppers and visitors to the area.
• Social media advert – A targeted advert on Facebook and Instagram to social media users within in the SE15 2, SE15 3, SE15 5 and SE15 6 postcodes, close to the site.
• Tea and Cake afternoon – An informal session at the on-site Consultation Hub, for local residents and shoppers to discuss the proposals and their experience of Peckham with the design team, primarily for older people in the community.
• Walk and talk session – A group walk and discussion around the site led by either the project team, or community group, local residents or local ward councillors. These sessions allowed local residents to indicate places and spaces they liked and disliked, and to provide inspirations and case studies for the project team.

734. The following table confirms the number and methods of the public consultations carried out:

Amount carried out:	**Process:**
162	Meetings held with local political, community and business stakeholders
7	Printed newsletters, sent to over 8300

	addresses throughout the course of the consultation process.
58000	Newsletters printed/ issued between 2022-2024
6	Adverts placed in local media outlets such as Southwark news, Peckham Peculiar and South London Press
11	Social media adverts (Facebook and Instagram) targeting local postcodes
51	Blogs and new articles published on the consultation website.
43	E-newsletters sent to a mailing list of 575 subscribers (as of July 2024)
20	Public consultations held at or in prominent locations near the Aylesham Centre
5	Community champions panel
9	Door knocking session in call area
9	Pop-up sessions
1	On-line consultation webinar
2	Public presentations by the architects of the masterplan
2	Open sessions presenting the visual identity of the development
6	Walk and talk sessions
3	Community information sessions
9	Meetings with local youth groups
6	Meetings and workshops with local elderly groups
2	Briefings with Morrisons staff members
21	Meetings with the ACA
7	Coffee mornings held at the consultation hub located in the Aylesham Centre
Bi-weekly	The consultation hub in the Aylesham Centre was open Tuesday afternoons and Friday mornings. In spring 2024, this was also open on Monday afternoons.

735. The public consultation initially started on 31st January 2022 but as referenced elsewhere in the report, the design of the development altered. A new/ differing approach was pursued in May 2023 and this adopted a new design brief which incorporated a revised approach to the public realm, heights of buildings and façade design.

736. Given the new design and changes to the proposed development, additional public consultation/ community involvement was carried out (and is referenced in the above table). This included e-newsletters, blogs, introducing the new design

team, and architects meetings with local residents and stakeholders. The further consultation also included meetings with the Aylesham Centre Community Action Forum (ACCF) as well as a multi-ward forum which is a council hosted meeting for residents across the wards related to Peckham. A number of Southwark councillors as well as faith groups were also consulted with regards the proposed development.

737. Public consultation events were then held (for the new scheme) such as the event in January and February 2024 which had 180 attendees with 46 people responses. The public event in May 2024 was visited by 234 people with 111 completing feedback forms. These forms were also available to be completed online by those that could not attend the event.

738. A Community Champions Panel was also set up . This panel of 15 people, was made up of a diverse group with regard to ethnicity, age and mobility. There were a total of six young people, eight older people, three wheel-chair users and one person with visual impairments. There were a total of four meetings and the panel considered issues such as the ground floor layout and uses (meeting 1st February 2024), capturing Peckham's uniqueness (19th March 2024), and quality of accommodation and building a space of community (19th April 2024). The panel included people from local youth groups, people who had attended the drop-in sessions, and people involved in local initiatives such as the Peckham Soup Kitchen.

739. Each meeting was attended by between 8-12 members and various points were discussed, including sightlines, wayfinding and the atmosphere of the new development. The SCI confirms that these issues were considered and responded to, including creating a suitable atmosphere through lighting and soft landscaping.

740. In addition to the panel sessions, the community champions were invited to a public consultation session on 16 May 2024 to review the designs and provide feedback. This was attended by eight people and consisted of a mix of four older people, two wheelchair users, three people aged 18 or under (two females and one male) and four people of mixed or Black ethnicity. This again identified a number of issues such as the need to include of public art which reflects Peckham; the SCI confirms that there could be areas of public art throughout the development. There were also comments about capturing Peckham's uniqueness, with the design response being a non-homogeneous design with varying colours so as to reflect the diversity and uniqueness of Peckham.

741. The issues below are set out in the SCI and were raised as part of the applicant's pre-application engagement:

- The accuracy of images used within the consultation material;
- The height and massing of the proposed development and whether this would be in keeping with the area.
- Many older residents noted that they have seen Peckham change significantly over the course of their lives and view the proposals for the

Aylesham site in this context.

- Local community groups raised concerns that the proposed development would represent an over-development of the site and wished to see the number of units decreased.
- Impacts upon local infrastructure.
- During the earlier stages of the consultation process, there was concern that the design team did not have sufficient experience of and appreciation for Peckham and the local area.

742. The SCI sets out how the proposed development was amended to reflect the feedback received. For example, a new design approach was accommodated in terms of height and massing. An issue was regarding the consultation process and how this needed to engage with local businesses. In response Tree Shepherd were commissioned, details of which have been outlined earlier in the report. Suggestions were also made regarding other issues, such as the use of non-slip materials in the landscaping, and this has been incorporated into the design.

743. From the above, it is evident that the wide-ranging consultation process was carried out before the application was submitted. This process has to an extent, helped to mould and shape the scheme. For instance, the height of the building have been reduced since the initial proposal.

744. It is noted that not all of the concerns that were raised, have been addressed, such as increasing the amount of affordable housing. From the SCI it is evident people have been concerned about affordable housing and commercial rents throughout the engagement process. The SCI confirmed that members of the public acknowledged that there was a requirement for new homes and that an increase in height of the buildings could allow the provision of more affordable housing, but there were still questions as to how affordable these would be. As referenced elsewhere in the report, the affordable housing offering has decreased since the initial submission.

745. The SCI is considered to be comprehensive and captures activities which have occurred over many years. It is noted that the consultation sought to communicate with a considerable number of different groups via different methods and whilst the applicant's responses have not addressed everything that was raised during the consultation process, they did consider their opinion. The impact is also referenced in associated parts of this officer report.

Council's consultation and engagement

746. In terms of the community engagement carried out by the council, once the application was submitted and accepted as valid, 27,141 notification letters were sent out which includes all addresses in the Rye Lane and Peckham wards. Along with the notification letter, a summary of the proposed development was provided, which contained images of the proposed scheme. Site notices as well as a press notice were also published and consultation letters sent to internal

council teams and external consultees. As the application is accompanied by an Environmental Statement, the consultation period ran for at least 30 days.

747. After the initial neighbour letters were sent, three public consultation events were held, two of which were in Peckham and one was in Nunhead Library. As referenced above during the course of the application the plans were amended, and a further 27,141 notification letters were sent notifying the public of the proposed changes. A further two public consultation events were then held in Peckham. This meant that a total of 54,282 neighbour letters and five public consultation events were held in total.

748. In addition to the public events referenced above, a further event was held with a small group of residents who wished to view the proposals using the electronic Vu City model, and this was facilitated by the council with assistance from a representative of Vu City. The Vu City representative was able to show the residents various views of the proposed development, and this took place in April 2025.

749. It is therefore considered that adequate efforts have been made to ensure the community has been given the opportunity to participate in the planning process.

Consultation responses from members of the public and local groups

750. Written comments received during public drop-in sessions:

- Lack of affordable housing, should be 35% not 12%;
- Rents for the private homes should be capped;
- 50% affordable housing should be provided;
- Dislike of the primary colours used throughout the development;
- Overcrowding from additional people;
- Rye Lane storey height out of scale with surroundings;
- Centre of scheme is very defensible, too many corners to hide behind;
- Does not benefit local residents;
- People are buying flats as investments and not living in them;
- Overly dense development;
- Unsustainable development;
- Impact upon laundrette facilities during construction and in the completed development;
- Pressure on public services;
- Increased prices would drive local people out of the area;
- Would create dark, cold, windy spaces which would not benefit the local community;
- Peckham homes are needed for Peckham families;
- There are more than 5,000 empty homes in Southwark;
- The council has said that it will have to rely on private developers for the foreseeable future;

- 18,000 people are on the housing, and half of them are children;
- In 2021 70% of Southwark residents in council housing earned less than £20,000 a year and half earned less than £10,000 a year;
- 10% are living with damp and mould which can cause serious health issues;
- Question who the flats are for when a two-bedroom flat would be over £1m, and luxury flats are not needed;
- The council has removed playgrounds to build houses and the Aylesbury Estate provides less social housing than it used to;
- Proper consultation is needed as the applicant does not want people to question the proposals;
- Gentrification would force people to move away due to high prices;
- Housing is a human right.

751. Letters informing neighbours about the planning application were sent by the council on 11th November 2024 and 6th February 2025 (re-consultation).

In total, 27141 neighbours were consulted, and 2,505 comments were received comprising

- 2,427 objections
- 59 comments in support and
- 19 neutral comments

752. Summarised below are the planning matters raised by members of the public with an officer response. Further detail on these matters are set out within the relevant sections in the report.

753. Comments in support of the application:

- Promotes safety and security
- Would turn a car park into housing
- Would provide new homes and contribute to housing targets
- More affordable homes could be provided on site but we are currently in a housing crisis
- The proposed height and massing takes into account the location
- The proposed density fits a zone 2 location
- Too many affordable homes would undermine the viability
- Having new commercial spaces and areas of public space would improve and encourage more usage
- The current car park is ugly and empty
- The development would bring new jobs, new amenities and new homes
- The consultation process has been extensive
- Should be taller as to accommodate more housing (10 to 20 storeys taller) if you can create a landmark whilst doing this
- S106 monies could be used to develop the Peckham Lido

- The mix of retail, leisure, and workspace elements could stimulate the local economy and enhance Peckham's position as a thriving commercial hub.
- The design incorporates modern, energy-efficient buildings, contributing to Southwark Council's commitment to reducing carbon emissions
- The walkways would make the site more accessible

754. Neutral comments:

- These were covered either in the letter of support section (above) or in the objection section below.

755. Objections:

Affordable housing

- The proposed provision of affordable housing on the site is unacceptable
- This should be more affordable housing than what is being proposed. Some representation letters referenced 50% to 75% provision.
- That the reduction to 12% would not be acceptable
- That there are large waiting lists in Southwark for housing
- That Peckham is an extremely deprived area and that local residents could not afford the homes being proposed.
- The affordable homes that are being proposed are not affordable
- Referenced the affordable housing mix between social rent and intermediate and how this was unacceptable. Should be more social rent.
- The lack of affordable housing is contributing to the gentrification of the area.
- Concerns as to the social impact the proposed changes would have/ the scheme would force BAME residents out of the area.
- Concerns that many properties would be second homes/ rented out/ air B&B/ investment properties.
- That the scheme would not provide any Community Land Trust properties.
- Concerns with regards the siting of the affordable units and that these would be located on the edges of the site.
- That the housing would not benefit local residents
- That the previous 35% provision should be honoured
- That the amount of affordable housing would change/ be reduced once the scheme is granted consent
- That the council should not have considered the application once the affordable housing offer was reduced

756. Overdevelopment of the site

- The number of properties on the site and that this is excessive, too dense
- Excessive height – out of scale with the surrounding area
- Too large
- Too many buildings
- Out of keeping with the low-level development in the surrounding area

757. Design and impact upon heritage assets

- The (maximum) height at 20 storeys is excessive and out of keeping with the surrounding low level buildings
- The overall design and appearance of the buildings are not of sufficient quality
- The 'standardised' design does not 'fit in' with the mixture of designs of Peckham
- Will cause harm to the adjacent heritage assets
- Will cause harm to the conservation area
- Concerns over the siting of the tallest buildings on the site and these being located to the east.
- That the design is more akin to that of a Central Business District
- Concerns with the overall layout
- There is no autonomous heritage impact assessment
- That the presented images are misleading and do not show the true impact
- That the proposed design and layout would cause wind tunnels
- That the development should be low rise
- That the proposed development would not create a 'sense of place'
- That this development is reminiscent of over large scale re-developments such as Elephant and Castle, Croydon and Lewisham
- Concerns about the finish and quickly becoming pastiche
- The designs of the buildings are awkward and should strive to find a mid point between elegant and striking
- Should have more green walls
- The historic buildings on Rye Lane are a jumbled mess of graffitied shop fronts that would greatly benefit from investment and master planning
- Positive that the scheme would provide 10% disabled housing
- Should ensure that affordable housing has disabled access

758. Environment and sustainability issues

- It meets the industry standard but could be better concerning sustainability and carbon
- That the scheme will impact upon local ecology
- That the development would not be complaint with UGF requirements.

- That the BNG appears that it was done correctly but that the site is a car park so the existing score would be low
- That the development's sustainability credentials are unclear, with limited emphasis on reducing the carbon footprint or reusing existing structures.
- That the development would be inconsistent with Southwark Council's Climate Emergency Declaration
- Will be an increase in pollution
- That there would be an increase in light pollution
- Short building lifespan, that the tests were only carried out for 60 years

759. Drainage

- Concerns about the drainage of the site and the impact upon the river Peck
- That there was inadequate reference to drainage and issues such as SUDS

760. Public and amenity spaces

- The amount of provided public and amenity space is limited/ too small. This is also compromised by the layout and servicing routes.
- That the amenity areas would not be wholly available to the public
- That the public space and amenity areas would experience a loss of light. Concerns about usability
- That there should be a significant increase in the amount of green/ amenity space.
- That the development would lead to overheating for the future residents
- Questions as to how the public space would be maintained?
- The wind report references the need for screening and planting and want to ensure that this would be maintained
- That other council's require more open space. Reference was made to Camdem
- Reference was made to the Southwark Open Space Strategy 2013
- There should be a community garden on site

761. Strain on local infrastructure and services

- That there would be an increase in pressure on GP, dentists and schools
- That there would be an increase in crime/ impact upon policing services.
- That there would be an increased demand on public transport, worsening overcrowding. Additional traffic and congestion on surrounding roads, impact upon Peckham Rye train station.

762. Loss of light and overshadowing

- That a considerable number of surrounding properties would experience a harmful loss of light and overshadowing from the proposed development.
- Concerns with regards the impact upon the living conditions of the future occupiers. Dark rooms, lack of light, concerns with regards the overall impact and would cause harm.
- That a number of proposed communal areas would not receive any/ would receive limited light.
- The report is dated April 2024 which is prior to the submission of the application and whether this reflected the current design
- That this would put a large proportion of Peckham in shade.

763. Loss of Privacy

- Increased overlooking into existing residential properties, reducing privacy for residents.
- Concerns about the privacy of the future residents.

764. Housing concerns

- That there are too many small properties. There are too many 1b and 2b flats.
- That there is a lack of family homes/ that these have not been sufficiently provided
- Reference was made to a GLA policy requirement for 16% of the development to be 4 bed+ homes.
- That the unit mix heavily relies on smaller flats.
- Concern with the layout and number of studio properties
- That Peckham is one of the poorest boroughs and that the development would not provide the required mixture of housing for the borough
- That the proposed development would increase house prices, making it unaffordable for people to buy.
- Concerns with the proposed layouts of the flats and that the quality of the proposed accommodation would not be sufficient
- Concerns with regards the adjacent night club (in the Jones and Higgins building) and the impact this could have

765. Community engagement

- That the consultation process was tokenistic and the developer did not listen/ want any meaningful feedback
- That the sessions were poorly advertised and that a number of people were not aware of the events.

- That the questions and reporting were selective and not meaningful
- That the consultation focused on less contentious issues and key items such as design/ affordable housing and open space were ignored.
- That the drop in hub has been closed for a pro-longed period
- That the sessions did not include all the information such as daylight/ sunlight and wind
- That suggested design changes were not considered
- That the website was not functioning at all times

766. Commercial impact

- That the proposed development would cause harm to the existing traders on site as well as those in the surrounding area.
- That the existing and new traders would not be able to afford/ would not be able to relocated within the proposed development. There is not a clear relocation strategy, especially in phase 2.
- That the proposed development would impact upon the range of cultural shops, increase in cost making it cost prohibitive for traders
- That the development would remove the shops that cater for those not so financially well off. Would 'price them out' of being able to stay in the area.
- That the development would displace BAME people and BAME businesses
- That the proposed development would remove the view from a number of the surrounding properties, such as the nearby roof top bars. That these bars rely on the views and that this will negatively affect their business.
- That local businesses, an example being such as Wing Tai and Eyecloud, have not been accounted for in the plans.
- That this would lead to an increase in rent levels
- Where will the handcart traders go?
- There would be a smaller supermarket, what is the impact of this?

767. Cultural impact

- It will erase Peckham's cultural heritage and cultural identity
- It will gentrify the area
- Will force locals out
- That this is a form of social cleansing
- Reference was made to food banks and cultural impoverty in the surrounding area

768. Transport

- There would be a loss of parking, that the existing car park is well used
- That the existing car park is not just used for visitors to Morrisons but also

the town centre.
- That there is insufficient parking being proposed
- That there would be sufficient blue badge parking
- That the petrol station is well used and that this would be lost.
- That there would be increased congestion on the roads/ footpaths
- Impact upon Rye Lane, the increase in the number of pedestrians could impact upon the cycle path
- Concerns about the cycle access through the site. This could be improved

769. Fire safety

- That the development would not be safe
- Reference to Grenfell and the materials used

770. Construction impacts

- Prolonged construction and the impact this would have upon nearby properties, the use of roads, the use of footpaths etc
- Unclear timeline, that this could take up to 10 years to complete and have to accommodate the impact for this period
- Impact in terms of noise and vibration
- The timeline is too long. This should be shorter

771. Councillor James McAsh (Goose Green ward)

772. Supported the following:

- It is positive that the pavement widths on Rye Lane would not be compromised on Rye Lane.
- That the pavement would be widened on Hanover Park.

Objected to the following:

- The scheme is not Southwark Plan-compliant with regard to cycle storage. 1000 spaces would be an enormous deficit.
- If a 1-bedroom property is intended for a couple then it should have 2 cycle parking spaces allocated to it, with more for 2-bedroom properties.
- These are homes which we would expect should last many generations and it does not sound like it is future-proofed with respect to the transport mode-shift that is demanded by planning policies, strategies and climate-goals.

773. Aylesham Centre Cart Traders

- Cart holders have not been included in the redevelopment process;
- Contrary to policies P32 and P33 of the Southwark plan which requires the carts to be retained and included in a business relocation strategy;
- The carts constitute small shops under the Southwark Plan;
- The impact upon small traders has been overlooked;
- Some carts have traded in the Aylesham Centre for over 20 years and serve the local community;
- The carts are not included in the proposed business relocation strategy and deferring discussions until a later date is not acceptable;
- The proposal would disrupt the cart businesses and jeopardize people's livelihoods.

774. Clifton Estate Tenants and Residents' Association (TRA)

Objections are as follows:

Impact upon the neighbouring properties

- Has not addressed the issues raised in the comments made by the Design Review Panel
- Concerns with regards the impact upon adjacent residential properties.
- Surrounding properties have issues with sunlight, condensation and mould.

Green/ amenity spaces

- The open space calculation has not been provided
- No breakdown on what are roads, green space or on the roof
- Neighbouring green spaces will see huge pressure, particularly from dog walking
- How the development mitigates the impact upon the space between Purdon and Flamborough House which is private council/estate land

Transport

- The proposal removes the boundary wall to the Morrisons car park, but does not show how the proposal knits into the neighbouring land, nor how the proposal seeks to mitigate any impact of the routes through land in other ownerships.
- Drawings show trees along the council owned land removed – how was this consulted on? How will the green boundary on the estate be supported rather than removed?
- There is a significant level difference. Does the plan assume a new retaining wall?
- The plan shows a route through but this involves removing car parking on

the LBC land – how has this been consulted on?
- How will the additional footfall through the Clifton car park be managed?
- Highway safety impact and the relationship between pedestrians, cars and refuse vehicles.
- This car park, and Mckerell road, suffers from illegal usage due to proximity to the town centre. How will the proposal contribute to managing this issue, or provide alternative pick up and drop off?
- Does the traffic assessment identify the number of pedestrians/other journeys through the clifton estate (i.e. new Aylesham residents walking through)?
- There should be specific design engagement around mitigation of the impacts of routes through the estate, pressure on parking (legal or illegal) and improvements to green spaces to accommodate the extra usage.

Construction Management Plan

- Request that surrounding estates are consulted upon with regards the CMP. This should include a language forum for those where English is not their first language.
- Concern with regards dust and internal air quality of the homes on the Clifton Estate.
- Concerns over the highway works to Clayton Road, as well as Hanover Park where the roundabout junction is dangerous (officer response: no highway works are proposed or required on Clayton Road)
- Concerns with regards the road surface

Deliveries routes (finished scheme)

- The delivery routes will now use Consort Road, how will Consort road
- There is currently no safe crossing from the estate to Morrisons/Hanover Park/Rye Lane and with additional HGVs this will be more dangerous.

Affordable housing

- The amount of proposed affordable housing would not be supported
- Southwark needs more affordable housing to support families and young people.

775. Vicar of St Mary Magdalene Church of England Church

- Such developments need to balance the communities history, present and future and those current residents, especially younger people having the opportunity to remain in these communities.
- History for historic buildings and architecture, present for the diversity of Peckham which Southwark prides itself and what has been a draw for

those coming alongside and a significant uplift to the social capital that African, Caribbean, Asian and European diaspora brings. Witnessed the impact of similar proposals in Woking town centre. This has majorly changed the town with towering buildings seen for miles around but also decimated the local high street and businesses.

- Harmful impacts to the flourishing and well-being of Peckham over time in the name of progress and cannot be reversed.
- Impact upon Rye Lane and the micro businesses with continuing high and unaffordable rents.
  Rye Lane and contribution to its upkeep and development is not mentioned and the impact will be greatest there and with the current indigenous business population of Peckham.
  Will create a dormitory suburb serving wealthier members in the two epicenters of our capital, the City of London and Canary Wharf
- The North Southwark development in Elephant and Castle and Bermondsey have shown massive character change beyond recognition. Does Peckham need this muscular development displacing historic vibrant communities?
- Something can be done that is collaborative and proportionate to history, present and future, with imagination, political will and community consent.
- The housing density will affect the makeup of the community disproportionately as well as those who can afford these homes, not least young current Peckham residents who see the links with family and community as strong.
  Would result in social engineering or unintended consequences for the cohesion or disintegration of the community;
  The significant reduction in affordable housing is a massive ‘red flag’ and contravenes Southwark Council's own policy.
- The impact analysis needs to be properly done and some of these are not accurate in measurement and we have known this in current processes we are experiencing in other consultations.
- Will impact existing Peckham residents where they will be dispersed further afield by the unaffordable prices for local residents not just here but Greater London.
- This will be seen as more gentrification than regeneration. Morally , ethnically and socially this current proposal is unacceptable and the council will lose a substantial amount of trust from existing residents that indicates by this going through that profit comes before the social well being of a community.
  This development and developer do not understand the nature of Peckham and Southwark council bringing this as it is as it currently stands is seen as a poor advocate for its residents,
- Opposed to this scheme as it currently stands owing to the principles outlined abov. It needs a reimagined ethical look - if not a new developer who we can have a mutual understanding rather than what can be seen as cynical profiteering for existing and future residents.

- The consequences of this will be felt and are already being felt for generations to come. The responsibility will be for all of us who are complicit in enacting and implementing such a decision. This is ethically and morally something that needs great consideration and acceptance of responsibility for a decision to go ahead.
- Revised scheme is in no way an improvement on the original proposal and bewildering for fair minded persons for the council to its own guidelines;
- Would be an immense breach of trust to the community and would not enhance but deteriorate already tenuous links with local democracy to one that favours economics at all costs.

776. Acting Church Secretary, Rye Lane Chapel

There are three main areas of concern that the amendments illustrate which were of concern to the Deacons of the Church and which are the basis for our objection to the amendments:

1) The existing Morrison's supermarket is a valuable resource within Peckham. On initial plans it seemed already to be a considerably smaller size than the existing Morrisons but these amended plans make it even smaller.
2) Although the reduction in planned dwellings from 877 to 867 is a small step in the right direction it is nowhere near enough and 867 dwellings is still far too many to try to pack into that space.
3) The main concern that the Deacons expressed is in the reduction of affordable dwellings from 35% to 12% and we feel betrayed by the developers. What Peckham needs is homes that local people can buy and not homes that overseas people or trusts buy for investment purposes. Young people in our church are unable to get on the property 'ladder' at all – even small dwellings are totally non-affordable and we do not think it too strong a word to call this 'betrayal' by the developers.

- Would have hoped that this would have contributed to 'community' within Peckham. Fear that the amendments sought make such community building less likely rather than enhancing such. Having such a low percentage of 'affordable' homes mean that for 88% of the flats they are out of the price range of almost all Peckham's inhabitants – not enhancing Peckham's sense of community cohesion at all.
- This response comes from the deacons who considered it at their meeting on 19th March. The subject was also raised briefly at the Church's Annual General Meeting on 16th March when there was widespread support for what is stated above, although the letter had not been drafted at that stage.

777. The Lord's Devine International Ministries

- As the proposed development includes flexible retail, leisure, and

commercial space, would like to formally express our interest in being considered for a place within the new scheme. Our church provides a range of community services, including such as food banks, youth mentoring, support groups, etc. which align with the council's commitment to fostering an inclusive and supportive local environment.

- Welcome the opportunity to discuss this further and explore how our organisation can contribute positively to the new development. Please let us know the next steps for expressing our interest and any relevant application or consultation processes we should be aware of.

778. Anticolonial Reading Club', social club at SET Social (including 16 signatories)

- Club is a social group in Peckham for a free-of-charge anticolonial reading minutes from the Aylesham Centre. Are approximately 30 in the group with the majority from Black, Asian and Minority Ethnic (BAME) background who meet regularly in Peckham to eat, socialise and shop and appreciate the diverse cultural life that Peckham provides.
- Strongly oppose redevelopment plan which would impact our housing, livelihood, and experiences in Peckham for the worse.
- Particularly concerned about the risk of displacement of BAME and low-income residents, including members of our group; insufficient affordable housing, and the negative impact on local businesses that our group routinely frequents.
- Our group comprises over 70% Peckham residents. Despite receiving offers to move to other locations, have rejected offers to switch our meetings outside of Peckham. Attracting members of the BAME community has been one of our goals in making an anticolonial reading group accessible to persons from colonial and racialised backgrounds.
- Deeply concerned the development will displace racialised and low-income residents and act as a magnet for affluent and typically white newcomers.
- The current proposal only builds in 12% of the total units for affordable housing which is shockingly low and contrary to Southwark Plan Peckham Area Vision (AV14),;
- Surprised the council would consider a proposal with such low units available for social rent, in particular after Berkeley Homes' recent decision to lower its affordable housing offer. Points to serious flaws in Berkeley Homes' viability assessment and why it was accepted by the council.
- Peckham is in the 10% 'most deprived areas' in England, the priority should be a redevelopment plan that provides **a majority** of affordable housing in line with the council's own target for 50% affordable housing;
- Lack of family homes including 4+ bed homes, instead prioritising unaffordable studio and one-bedroom units. This is entirely unsuited to the needs of Peckham families and residents.

- Members of our social group that are Peckham residents. Highly concerned that this redevelopment plan will cause a subsequent increase in our own rents and attract higher-income residents to this neighbourhood.
- As rents rise in the neighbourhood, as is likely to be accelerated with any new-build construction, many of us will be priced out of Peckham.
- Berkeley Homes states that it will add 'a thriving new corner' for Peckham residents, but this means for affluent and white residents only. This runs directly contrary to the Council's on strategic plan SP 2022, which seeks to preserve the character of the borough and improve the lives of **existing** residents.
- Southwark Council must not add fuel to the existing housing crisis in London, but instead make sure that community members are not displaced and preserve the BAME make-up of the neighbourhood.
- Strongly oppose this proposal for its planned shuttering of local businesses at the Aylesham Centre. Many of us eat at the food stalls in the Aylesham Centre because those food vendors are local, small business, and affordable. Proposal would gut affordable eating options in the area and drastically change the local character of Peckham for us.
- This plan proposes clear changes to 'protected characteristics' of the neighbourhood, with the closing of small businesses in the area.
- If the plan proceeds and the demographic make-up of Peckham shifts, our social group and its members would be forced to move our meetings to another borough.
- Our group has created valuable bonds to this neighbourhood, but that's only because of Peckham's diverse, accessible and unique character.
- Strongly urge the council to reject the Berkeley Homes redevelopment and design plan for the Aylesham Centre as this plan does not meet local community, housing, business or our needs.

779. <u>Parochial Church Council and the wider church community</u>

- Welcome the principle of redevelopment which provides retail space (as now) and additional community and residential provision
- Acutely conscious of the need for social and affordable housing, including members of the congregation.
- However, serious reservations about the current proposal due to lack of affordable housing, especially social housing;
- The nature of the housing does not meet local needs and the most recent reduction in the number and proportion of affordable housing units is completely unacceptable against local need.
- The Southwark plan commits to 35% affordable housing in all new developments, to include a proportion of social housing.
- The original Aylsham plan –while unsatisfactory in a number of respects – did include a significant number of affordable homes and at least some social housing.
- Replacing the commitment to affordable and social housing with a financial contribution does not meet the real requirement;

- The quantity of housing and the scale of the development is inappropriate for the area, both socially and environmentally.
- The area has a significant proportion of social housing, and some of Peckham's remaining historic buildings. The large blocks of private housing would not fit in with the area;
- Damage to the cultural diversity of the area;
- Reducing the store size and car parking for Morrisons would damage its customer base;
- Supermarket used by global majority heritage members of the community, and provides a valuable social hub;
- - Some positive refurbishment in Peckham High Street, but the area is still fragile and would be overwhelmed by huge blocks;

- The proposal for the site should be reconsidered.

780. Protect our Places coalition

This is a coalition of nine campaign groups across London contesting gentrification of markets and affordable retail spaces. Object to the application on the following grounds:

- Lack of affordable housing which does not meet community need;
- Peckham has particularly high levels of deprivation and a need for social housing;
- New homes being bought as second homes;
- Loss of social rented homes in Southwark;
- Lack of family housing and too many studio flats;
- No commitment to a Community Land Trust;
- Impact of increased rent levels in the local area;
- Construction impacts;
- Air pollution, noise and transport impacts;
- Loss of natural light;
- Impacts upon local infrastructure;
- Inaccurate trip generation rates;
- Displacement of existing small businesses;
- Adverse equalities impacts;
- Indirect socio-economic impacts have not been considered;
- Application does not address residents' concerns which are set out in the draft Peckham Area Character Study;
- No detail on the proposed business relocation strategy which is a policy requirement;
- Lack of support for vendors in Market Place Peckham;
- Planning process and language is difficult for people to engage with;
- The rights and long term security of existing and future independent traders must be secured on the site;

- Lack of meaning consultation, particularly with local businesses;
- Unacceptable environmental impacts;
- Lack of true, accessible to all green space;
- Failure to meet the required urban greening factor score;
- Lack of attention to wind microclimate issues;
- Lack of information about future ownership, public use, management and maintenance;
- Release of embodied carbon through the construction process.
- Unacceptable height, scale, massing and arrangement in low-rise Peckham;
- Significant heritage impact and contrary to tall building policy in the Southwark Plan.

781. Aylesham Community Action

- Lack of affordable housing
- Will increase the displacement of lower income and Black, Asian and Minority Ethnic (BAME) people.
- There will be substantial negative socioeconomic and equalities impacts to Peckham, particularly to marginalised groups. This impact has not been properly assessed or mitigated.
- The proposed open space is of insufficient size and quality. Green space does not comply with the GLA's Urban Greening Factor requirements. The failure to meet London Plan standards for access to daylight and sunlight will cause harm.
- The proposed development will cause harm to the Rye Lane Peckham Conservation Area and other designated and undesignated heritage assets in Peckham town centre. This harm is not counterbalanced by public benefit.
- As a high-density development, the scheme fails to meet appropriate design standards. Evidence for this lies in the overall form and impact on townscape, of both buildings and external spaces. In addition, standards of internal design are minimal. The scheme causes harm on all planning and architectural fronts, with long-term adverse impacts.
- The proposed development will cause harm to the Rye Lane Peckham Conservation Area and other designated and undesignated heritage assets in Peckham town centre. This harm is not counterbalanced by public benefit.
- As a high-density development, the scheme fails to meet appropriate design standards. Evidence for this lies in the overall form and impact on townscape, of both buildings and external spaces. In addition, standards of internal design are minimal. The scheme causes harm on all planning and architectural fronts, with long-term adverse impacts.
- There will be a negative impact of the extra population on the capacity of

public transport and on the junction of Rye Lane and Peckham High Street, close to the site. This impact has not been properly assessed or mitigated. The application fails to comply with the transport policies in the London Plan or the Southwark Plan.

- The failure to comply with the DCC (Development Consultation Charter) has resulted in unsatisfactory consultation by Berkeley Homes. The ACCF (Aylesham Centre Community Forum) created by the Council failed to mitigate this. Refusing permission will enable a revised brief to be co-produced by the council and the local community, for a plan to meet local needs which supports the town centre to develop its uniquely Peckham character and contributes to the health and well-being of the existing population as well as future generations.
- There is a focus on 1 bedroom and studio properties, and the proposal does not address the lack of family homes.
- The development would cause wind tunnels
- Daylight and sunlight issues and the associated impact upon the living conditions of the surrounding properties
- No commitment to accommodate a CLT on the site
- The reduction in car parking and the associated impact upon the town centre

782. Peckham Heritage

783.
- The scheme proposed here is perfunctory, bleak and insensitive to the social, physical and historical context.
- The focus of this objection is limited to aspects of heritage in a broader definition and does not concern other issues such as design standards, environmental aspects and open space.
- From an initial inspection, it appears most unlikely that these considerations might offer acceptable benefits which mitigate this harmful development

784. Peckham Society

Object owing to:

- Design, impact upon site and surrounding area/ conservation area.
- Reference to the CLT and not providing this.
- Daylight/ sunlight and impact upon future residents.
- Orientation and some balconies facing north. Impact upon living conditions.
- Amount of affordable housing

785. Conservation Area Advisory Group

786. Object:

- Cause harm to the central Peckham, particularly the Rye Lane and Peckham Hill Street conservation areas. The CAAG panel unanimously recommends it refusal.
- A new planning brief should be prepared
- A well-preserved town centre has grown in an organic way since it was recorded in the Domesday Book in 1180
- The design is far too dense
- Too many flats
- Too tall
- Narrow spaces between the housing blocks
- Should be limited to 400/ 500 flats on the site
- The development is too commercially driven, it would mainly benefit developers rather than the community of Peckham
- A taller building to the east of the Aylesham site could open up more space to make the interior of this site more open and better ventilated.

787. Southwark Law Centre

Object to the application, raising concerns regarding the following:

- Concerns about the viability and how this was assessed.
- The amount/ provision of affordable housing and how this is inadequate
- Breach of site allocation CLT requirement
- The proposed housing mix. Issue with the 1b1p flats and the size of the bedroom for the amended proposal.
- Local businesses and the affect/ impact upon these. Refence to the retail strategy
- Impact upon the town centre
- Site allocation and recruitment to retain floor space
- The proposed public space being affected by servicing routes etc
- Visual impact, too tall, design etc
- Sunlight/ daylight impacts
- Transport impact

Consultation responses from external and statutory consultees

788. Summarised below are the planning matters raised by external and statutory consultees. Matters are addressed within the relevant sections in the Assessment section of this report.

789. Greater London Authority (GLA) stage 1 report (initial consultation prior to the amendments the application)

Land use principles: The principle of the mixed-use residential-led development is supported. The Local Planning Authority (LPA) must confirm that the quantum of residential units is acceptable.

Affordable housing: The proposal delivers 270 affordable housing units (35% by habitable room), with a tenure split of 70% low-cost rent / 30% intermediate product. Subject to acceptable affordable tenures; the proposals may be eligible to follow the Fast Track Route.
Urban design and heritage: No strategic concerns are raised to the principle of tall buildings on the site. Refinements to the layout and architecture should be considered. A very low to middle level of less than substantial harm is caused to heritage assets which must be outweighed by the benefits of the proposal.
Transport: Pedestrian and cycle conflicts with bus station operations must be addressed. Further information and refinements to Healthy Streets, car and cycle parking, delivery and servicing, construction logistics, and Travel Plans are required.
Other issues on sustainable development and environmental issues also require resolution prior to the Mayor's decision making stage. Further information is required for the energy strategy, whole life cycle carbon, circular economy, green infrastructure, water and air quality.
Conclusion: That the Council be advised that the application does not yet fully comply with the London Plan. Outstanding matters relating to urban design, heritage, transport and sustainability should be addressed.

790. Arqiva:

No objection

791. Environment Agency:

Have assessed this proposal as low risk. The EA therefore do not have any specific comments to add. Informatives recommended.

Re-consultation:
Response remains the same (as above).

792. Health and Safety Executive:

This has been referenced in the main body of the report.

Initial comments:
HSE is content with the fire safety design, to the extent that it affects land use planning. However, HSE has identified some matters that the applicant should try to address, in advance of later regulatory stages.

Re-consultation:
Following a review of the information provided with this consultation, the proposed design changes do not appear to affect the fire safety design of the development, therefore, HSE has no comment to make.

793. London Borough of Bromley

No objections

794. London Borough of Lambeth

Initial comments:
No objection but raised a number of queries about views from areas such as Brockwell Park or Norwood Park.

Re-consultation:
No objection.

795. London Borough of Lewisham

No objection: The proposed new buildings will sit between the towers of Vauxhall and Witcombe Point, they will intensify the view, creating a taller skyline, but will not block the appreciation of any landmarks in the view.

796. London Fire Brigade:

Raised a number of concerns:

- The layout of the buildings and areas such as the lobby areas could become compromised by heat and smoke.
- Concerns about the location of cooking facilities adjacent the front door.
- Concerns with regards the stay put/ evacuation process for various parts of the site.
- Concerns with regards the cycle stores and these requiring fire and smoke control systems.

Officer response: This matters are considered in the main body of the report.

797. Metropolitan Police (Design out crime):

No objection but suggested a condition.

798. Historic England:

Historic England has no in-principle issue with the redevelopment of the Aylesham Centre site which is allocated for redevelopment with buildings of increased height in the Southwark Plan. However, HE consider that the overall height and distribution of tall buildings would have in an incongruous relationship with the more modest-scale and fine grain townscape along Rye Lane and Peckham High Street, from some locations appearing as an enormous wall of development in the background of key views of the Rye Lane Peckham Conservation Area. HE consider that these impacts would cause harm to the conservation area's character. This harm could be mitigated through the development of a frontage building to Rye Lane that successfully responds to the fine grain and modest scale of buildings within the conservation area. Unfortunately, HE consider that this opportunity has been missed due to the overbearing presence of Buildings A, B and C in key conservation area views.

799. Officer response:

The design and the impact upon the nearby heritage assets have been referenced in the design section.

800. Natural England

No objection

801. NHS

Seek a s106 contribution of £73,830 for health infrastructure..

802. Officer response:

Health infrastructure can be funded through CIL therefore this has not been requested.

803. Southwark Conservation Areas Advisory Group

Object and raised the following:

- That the site should be subject to a new planning brief
- Impact upon the character and appearance of the site and surrounding area
- Too many dwellings on the site, development is too dense
- Impact upon heritage assets
- Taller building should be located on the eastern part of the site so as to make a better space.

804. Transport for London (TFL) Underground:

No comment

805. Transport for London (TFL):

- Concerns with pedestrian/ cyclists safety utilising the bus station/ footpaths. There would be an increase in the number of users utilising this space.
- Concerns over the access rights over TFL land.
- Concerns about the design of Hannover Park and the impact upon bus movements.
- Concerns about noise and the impact upon the bus station.
- Concerns with regards delivery and servicing and the use of bollard controlled restricted access through the bus station.
- Concerns about the delivery and servicing proposals for the commercial

units

- The supermarket could offer home delivery and there is no provision for additional vehicles associated with this service.
- Although there is a reduction in the number of parking spaces, it should be car free and would be contrary to Policy T6.
- Disabled parking,
- Confirmed that at least 20% of the car parking spaces should be electric.
- A travel plan would be required via condition
- Responding to a letter of representation raising concerns with regards the capacity at Peckham Rye station - TFL are aware of the station improvements that are occurring. Analysis also suggests that there is no capacity need generated by the development at Peckham Rye Station.
- Concerns about the east/ western access through the site.

806. UKPN:

Queried access to the substation being maintained. Applicant confirmed that access would be maintained.

807. Thames water:

Suggested conditions and informatives

808. Officer response:

These could be imposed if planning permission is granted.

Consultation responses from internal consultees

809. Summarised below are the planning matters raised by internal consultees. Matters are addressed within the relevant sections in the Assessment section of this report.

810. Archaeology

The applicant's archaeologists provided a written scheme of investigation for the monitoring of a limited level of geotechnical works, which were to be undertaken pre determination. This has not happened as previously agreed. This lack of information has not been acknowledged in the ES or other documentation or adequately recorded in previous correspondence. Suggested conditions.

811. Officer response:
This has been referenced in the associated section of the report. Any concerns, could reasonably be addressed through conditions.

812. Building Control

No comment

813. CCTV

The application will severely impact the council's owned CCTV radio network. Disruption to the CCTV system will not just be confined to a narrow corridor between transmission nodes, but will also include corridors that contain construction cranage while the development is under construction. Redesign of the existing radio network will be necessary to alter the existing lines-of-sights on which the current system operates. There will be a financial contribution and or legal agreements

814. Officer response:

This could be mitigated through a s106 legal agreement.

815. Design and conservation

The comments have been incorporated into the main body of the report.

816. Ecology:

Asked for further information/ points of clarification during the course of the application. Confirmed that there would be an 89.91% increase in BNG on the site. Also confirmed that this would be classed as significant.

817. Environmental Protection Team (EPT):

During the course of the application, further information was submitted which was also reviewed and assessed. Raised no objection but suggested conditions.

818. Officer response:
This has been referenced in various sections of the report.

819. Flood risk

Satisfied to pass this application subject to conditions. This has been expanded upon in the main body of the report.

820. Local Economy Team (LET):

In general, LET are content to support this application which matches the economic, job, and growth plans as discussed in the planning statement. Jobs and training figures provided.

821. Officer response:
Suggested various obligations to be addressed via a s106 legal agreement.

822. Network Development

Further detail will be provided as part of s278 agreements and DCLPs submitted post-permission.

823. Officer response:
These issues could be addressed via conditions and within a s278 agreement.

824. Planning Policy

Referenced the housing mix, the reprovision of the supermarket and other issues that have been expanded upon in the main body of the report.

Requires more information on public toilets and water fountains.

Commented on the SCI and energy which have also been incorporated into the main body of the report.

825. Public Health Team

Raised a number of issues including the following:

- That the development does not provide 35% affordable housing
- That affordable housing should be distributed in all of the blocks instead of being located in a limited number of blocks.
- The 10% wheelchair housing is situated all around the development. These should be located in blocks closer to the car park and bus station.
- That the workspace include a low rental unit for Community Interest Company supporting health and well being in the local area.
- The restrictions on maximum drinking establishments (Sui Generis) are supported from a Public Health perspective.
- Community consultation highlighted the need for the development to support independent traders. It is recommended that retail units are prioritised for Afro- Caribbean food and product retail in line with the current percentage highlighted in the retail analysis (for example 36% of Afro-Caribbean food retail to all food retail).
- As a large scheme in a town centre the development is required to provide free public toilets, public drinking fountains and public seating (P35).
- The DAS requires greater clarity on whether the accessible WCs that will be included within 40 m from any reception point / office area are *publicly* accessible and for what length of time.
- Recommend locating toilets within Morrisons alongside the Changing Places toilet which should include unisex provision.
- There was consistent feedback from community consultation that existing green and open space in Peckham is underused, that there needs to be space for community events and sport, and that young people feel Peckham could be a more welcoming place.
- It is strongly recommended that Public Health are consulted on these financial contributions so that they meet identified health needs.
- It is also recommended that the sculpted lawn on the podium/ roof garden between blocks L,M,N,Q,P should be activated for sports opportunities for young people as opposed to prioritising relaxation (where there is ample provision in other locations).
- Public Health support the use of colour and vertical art in response to community feedback to avoid a ‘generic’ build and the integration with the local character through use of archways.

826. Sustainable Growth

No comment received at the time of writing.

827. Transport Policy Team

Further information was received during the course of the application and the impact has been referenced in the main body of the report.

828. Urban forester

Initially asked for further information such as the need to consider SUDS regarding location and extent of any attenuation tanks. Further information was provided and raised no objection but did recommend appropriately worded conditions if permission were granted.

829. Officer response:
Conditions could be imposed and with these in place, the development would have ana acceptable impact.

830. Waste Management Team:

No objection. Please ensure they deploy food waste bins are we now collect food waste from communal properties

Human rights implications

831. This planning application engages certain human rights under the Human Rights Act 2008 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.

832. This application has the legitimate aim of providing a new mixed-use development comprising new retail uses, workspaces, new homes and new public 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 statement

833. 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.

834. The council provides a pre-application advice service that is available to all applicants in order to assist applicants in formulating proposals that are in accordance with the development plan and core strategy and submissions that are in accordance with the application requirements.

Positive and proactive engagement: summary table

835.

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?	PARTIALLY
Was the application validated promptly?	YES
If necessary/appropriate, did the case officer seek amendments to the scheme to improve its prospects of achieving approval?	Yes – various changes and further information was received such as highway changes. Further information concerning items such as energy and the living conditions of the future occupiers were also received.
To help secure a timely decision, did the case officer submit their recommendation in advance of the statutory determination date?	No – a number of issues have raised questions that required changes and further information or clarification.

Conclusion and overall planning assessment

836. The redevelopment of the Aylesham Centre in Peckham has been a long held aspiration in planning policy terms, having first been identified as a development site in the Peckham and Nunhead Area Action Plan (now rescinded), and more recently in the 2022 Southwark Plan. It is clearly an underused site in the town centre, dominated by car parking in spite of being in a highly accessible location for public transport, and is large enough to make a significant contribution to housing in the borough.

837. The planning requirements for the site are set out in site allocation NSP74 in the Southwark Plan which have been considered in detail in the main body of the report. In many respects the proposal would deliver upon these requirements, such as new retail space including a new supermarket, a significant quantum of new housing, and new public realm and routes through the site.

838. Transport issues have been considered in full in the report, and subject to agreeing a scheme of works to the bus station with TfL, the bus station capacity would be retained. It is recognised that the proposal would cause some significant daylight and sunlight impacts to some of the surrounding properties. However, given that the site is located in a town centre, is allocated for a significant number of new homes and the site is clearly underutilised in its current form, officers consider that these impacts would be acceptable, and would not have recommended refusal of planning permission on this basis.

839. As set out in the heritage section above, the proposal would cause a medium to high level of less than substantial harm to the character and appearance of the Rye Lane Peckham Conservation Area. In accordance with the NPPF (and applicable caselaw) considerable weight attaches to this harm as outlined earlier in the report.

840. In assessing whether this harm is outweighed by sufficient public benefits proposal, the low level of affordable housing proposed and the lack of any CLT homes (as expected by policy NSP 74) are key limitations as to the extent of the public benefits delivered by the proposal.

841. It is acknowledged that the proposal does deliver public benefits such as the new public realm which would be available to the people in the area, the new retail uses, workspace and housing.

842. However, the harm to the conservation area would be enduring, and would irreparably alter the character of this important street in the conservation area in a harmful way. It is the local community who would predominantly have to endure this harm, and it is in this context that the limited amount of affordable housing now proposed is a significant shortcoming in the extent of the public benefit delivered by the proposal (and to the local community). As noted above, this shortcoming impacts on those with protected characteristics.

843. Officers do not consider that the benefits of the proposal outweigh the harm to the conservation area to which great weight attaches. This judgment impacts on the compliance of the proposal with the development plan (due to the breach of the heritage policies set out in the putative reason for refusal).

844. Officers therefore recommend that the non-determination appeal should be defended on the basis of the putative reason for refusal identified above.

BACKGROUND INFORMATION

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Local Development Framework and Development Plan Documents	Planning and Growth Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 0207 525 5410 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Relevant planning policy
Appendix 2	Planning history of the site and nearby sites
Appendix 3	Consultation undertaken
Appendix 4	Consultation responses received

AUDIT TRAIL

Lead Officer	Stephen Platts, Director of Planning and Growth		
Report Author	Victoria Lewis, Team Leader		
Version	Final		
Dated	1 July 2025		
Key Decision	No		
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER			
Officer Title		**Comments Sought**	**Comments included**
Strategic Director, Finance		No	No
Strategic Director, Environment, Neighbourhoods and Growth		No	No
Strategic Director, Housing		No	No
Date final report sent to Constitutional Team			4 July 2024

Appendix 1: 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.

Section 2 - Achieving sustainable development
Section 5 – Delivering a sufficient supply of homes
Section 6 - Building a strong, competitive economy
Section 7 - Ensuring the vitality of town centres
Section 8 - Promoting healthy and safe communities
Section 9 - Promoting sustainable transport
Section 11 - Making effective use of land
Section 12 - Achieving well–designed places
Section 14 - Meeting the challenge of climate change, flooding and coastal change
Section 15 - Conserving and enhancing the natural environment
Section 16 - Conserving and enhancing the historic environment

London Plan 2021

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 SD6 – Town centres and high streets
Policy SD7 - Town centres: development principles and Development Plan Documents
Policy SD8 - Town centre network
Policy SD9 - Town centres: Local partnerships and implementation
Policy SD10 - Strategic and local regeneration
Policy D1 - London's form, character and capacity for growth
Policy D2 – Infrastructure requirements of sustainable development
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 E1 - Offices
Policy E2 - Providing suitable business space
Policy E3 - Affordable workspace
Policy E4 – Land for industry, logistics and services to supports London's economic function
Policy E7 – Industrial intensification, co-location and substitution
Policy E9 - Retail, markets and hot food takeaways
Policy E11 - Skills and opportunities for all
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 GG1 – Building strong and inclusive communities
Policy GG2 – Making the best use of land
Policy GG3 – Creating a healthy city
Policy GG4 – Delivering the homes Londoners need
Policy GG5 – Growing a good economy
Policy GG6 – Increasing efficiency and resilience
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 HC1 - Heritage conservation and growth
Policy HC3 - Strategic and local views
Policy HC5 - Supporting London's culture and creative industries
Policy HC6 - Supporting the night-time economy
Policy S1 – Developing London's social infrastructure
Policy S4 - Play and informal recreation
Policy S6 - Public toilets
Policy SD1 – Opportunity areas
Policy SD6 – Town centres and high streets
Policy SD7 – Town centres: development principles and development plan documents
Policy SD8 – Town centre network
Policy SD10 – Strategic and local regeneration
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 T6.5 - Non-residential disabled persons parking
Policy T7 - Deliveries, servicing and construction
Policy T9 - Funding transport infrastructure through planning

London Plan Guidance:

Sustainable transport, walking and cycling
Accessible London
Affordable housing consultation draft
Affordable housing and viability
Air quality neutral
Air quality positive
'Be Seen' energy monitoring guidance
Characterisation and Growth Strategy
Circular Economy Statements
Development Viability Consultation Draft
The control of dust and emissions during construction and demolition
Fire safety
Energy Assessment Guidance
Housing design standards
Housing SPG
Urban greening factor
Whole Life-Cycle Carbon Assessments
Planning for Equality and Diversity in London
Optimising Site Capacity: A Design-led Approach
Public London Charter
Shaping neighbourhoods: play and informal recreation

Historic England Guidance:

Managing significance in decision taking in the historic environment
Conservation Area Appraisal, Designation and Management
The Setting of Heritage Assets

Southwark Plan 2022

On February 23rd 2022, the Council adopted the new Southwark Plan which supersedes all 'saved' policies in the Southwark Plan 2007, and the Core Strategy 2011. Southwark still proposes Core Strategy principles, and these have been included in their own section within the Southwark Plan 2022. The relevant policies of the Southwark Plan 2022 are:

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
P16 – Designing out crime
P17 – Tall buildings
P18 – Efficient use of land
P19 – Listed buildings
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
P30 – Office and business development
P31 – Affordable workspace
P32 – Small shops
P33 – Business relocation
P35 – Town and local centres
P37 – Protected shopping frontages
P39 – Shop fronts
P44 – Broadband and digital infrastructure
P45 – Healthy developments
P46 – Leisure arts and culture
P47 – Community uses
P49 – Public transport
P50 – Highways impacts
P51 – Walking
P53 – Cycling
P54 – Car parking
P55 – Parking standards for disabled people and the physically impaired
P56 – Protection of amenity
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

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

ST1 – Southwark's development targets
ST2 – Southwark's places

AV 14 – Peckham area vision

NSP74 – Aylesham Centre and Peckham Bus Station

Supplementary Planning Documents (SPD's)

Residential design standards
Affordable housing
Design and Access statements
Development viability
Heritage SPD
Section s106 and CIL SPD
Draft affordable housing SPD
Draft s106 and CIL supplementary planning documents

Appendix 2 - Planning history of the site and nearby sites

The previous owner of the site entered into pre-application discussions with the council and consulted the public and various other stakeholders. An application for a Scoping Opinion under the Town and Country Planning (Environmental Impact Assessment) Regulations (2017) was submitted and a Scoping Opinion issued on 16th July 2020 (reference: 20/AP/0749). However, no planning application was submitted, and the site (excluding the petrol station which is owned by Morrisons) was purchased by the applicant in 2021.

Following the purchase of the site the applicant entered into pre-application discussions with the council up until the submission of this planning application, and undertook numerous public and stakeholder consultation exercises. Further information in this respect is provided in the corresponding sections of this report.

Aylesham Centre:

Unit 15A the Aylesham Centre
21/AP/4619 - Temporary change of use for a period of two years from retail (Class E(a)) to a Consultation Hub (Sui Generis). Planning permission was GRANTED in February 2022 for a period of 2 years which has now expired. The planning application was renewed under reference 23/AP/3555, and expires on 08/02/2026.

An EIA Screening Opinion request was previously submitted to Southwark Council on 11 March 2020 (ref: 20/AP/0749) for the following:

"Scoping opinion request for 'Demolition of existing shopping centre building and bus standing area and construction of approximately 7 new buildings up to circa 20 storeys plus basements across the site, approximately 850 - 1,000 new residential dwellings in 85,000sqm of residential floorspace, approximately 12,000sqm of non-residential flexible floorspace including a replacement Morrisons supermarket, public and private amenity spaces, pedestrian and vehicular routes, replacement and expanded bus stand with associated bus driver/operator welfare facilities, replacement bus stops and partial replacement of existing retail car parking at basement level'."

A further scoping opinion was considered on 27.03.2024:

24/AP/0111 – Scoping opinion - Request for an Environmental Impact Assessment (EIA) Scoping Opinion pursuant to Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations, 2017 (as amended) (the EIA Regulations) in respect of the Applicant's forthcoming detailed planning application for the redevelopment of the Aylesham Shopping Centre

There have also been a number of tree applications on the site:

25/AP/1085 and 25/AP/1086 were granted permission in May 2025. These granted consent to fell and to pollard a number of trees within the site.

Relevant planning history of neighbouring sites

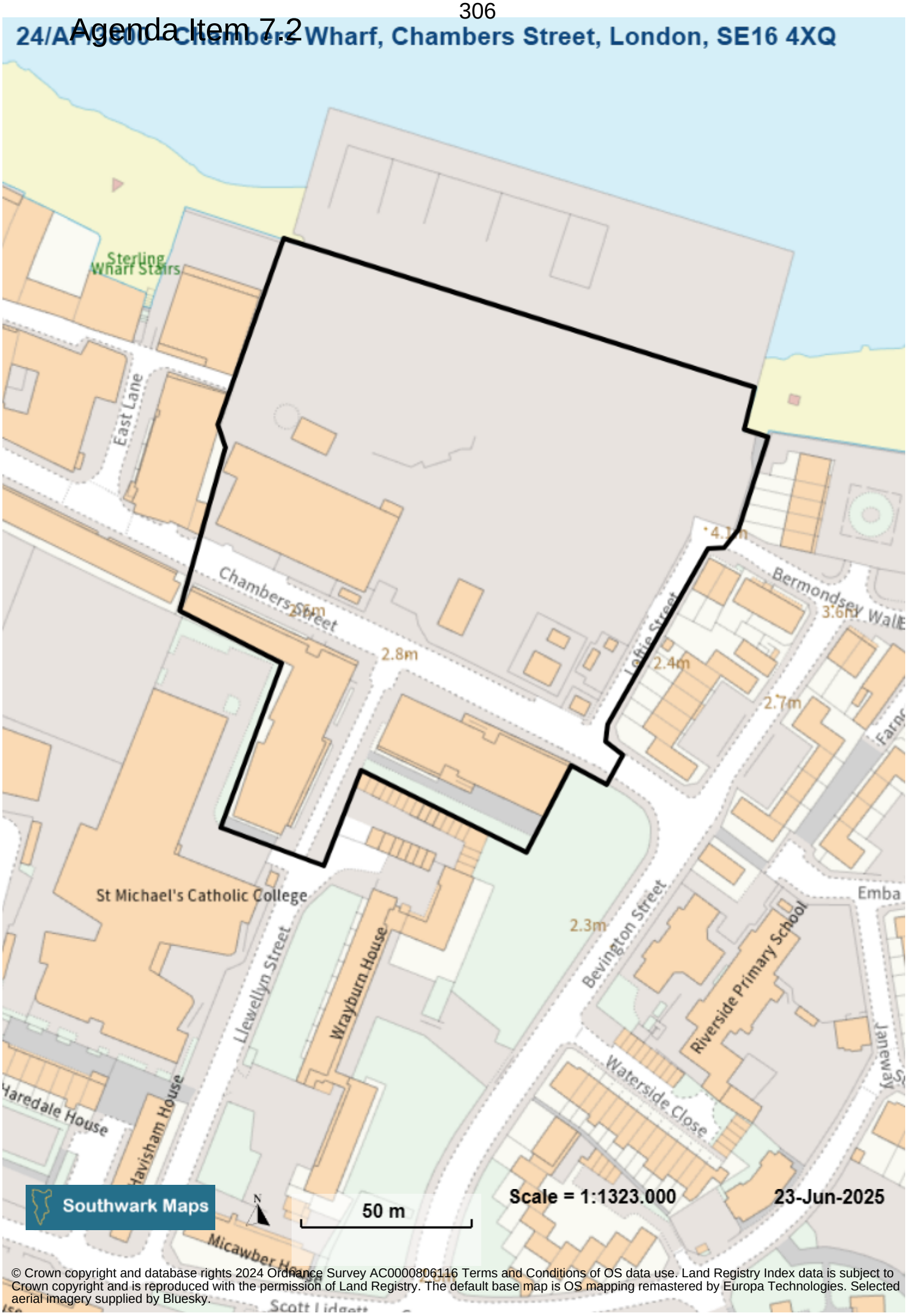
There are a number of smaller-scale planning permissions in close proximity to the site but these would not materially affect the proposed development. The following would however need to be considered as this could materially impact upon the siting and quality of the residential accommodation:

82-84 Peckham High Street - 22/AP/3024 - Erection of a 4-storey building containing basement retail storage, ground floor retail unit, first floor office and 3 x residential units across the second and third floors (1 x studio, 1 x 1 bed and 1 x 2 bed) following demolition of existing single storey retail unit. GRANTED

68-72 Peckham High Street and 1A Rye Lane - 23/AP/2878 - Change of Use of Basement, part of Ground Floor [Excluding Shop Units], First and Second Floors from a Social Club (Sui Generis Use) to a Mixed-use Nightclub, Live Music Venue and Drinking Establishment with Expanded Food Provision (Sui Generis Use) and Change Of Use of Third Floor From Retail (Use Class E) to a Mixed-Use Nightclub, Live Music Venue and Drinking Establishment with Expanded Food Provision (Sui Generis Use) and the Installation of HVAC Units. Planning permission GRANTED

24/AP/0176 – COU from C4 HMO to sui 8 person

Agenda Item 7.2



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Meeting Name:	Planning Committee (Major Applications) B
Date:	15 July 2025
Report title:	**Development Management planning application:** Application 24/AP/3800 for: S73 Material Amendment Application **Address:** Chambers Wharf Chambers Street London SE16 4XQ **Proposal:** 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: Current description of development attached to reference number 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; Proposed 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 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**: 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	NO

their recommendation in advance of the statutory 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: Application file: 24/AP/3800 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 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 0207 525 0254 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Recommendation (draft decision notice)

Appendix 2	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	7 July 2025		
Key Decision	No		
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER			
Officer Title		**Comments Sought**	**Comments included**
Strategic Director of Finance and Governance		No	No
Strategic Director of Environment and Leisure		No	No
Strategic Director of Housing and Modernisation		No	No
Date final report sent to Constitutional Team			04 July 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

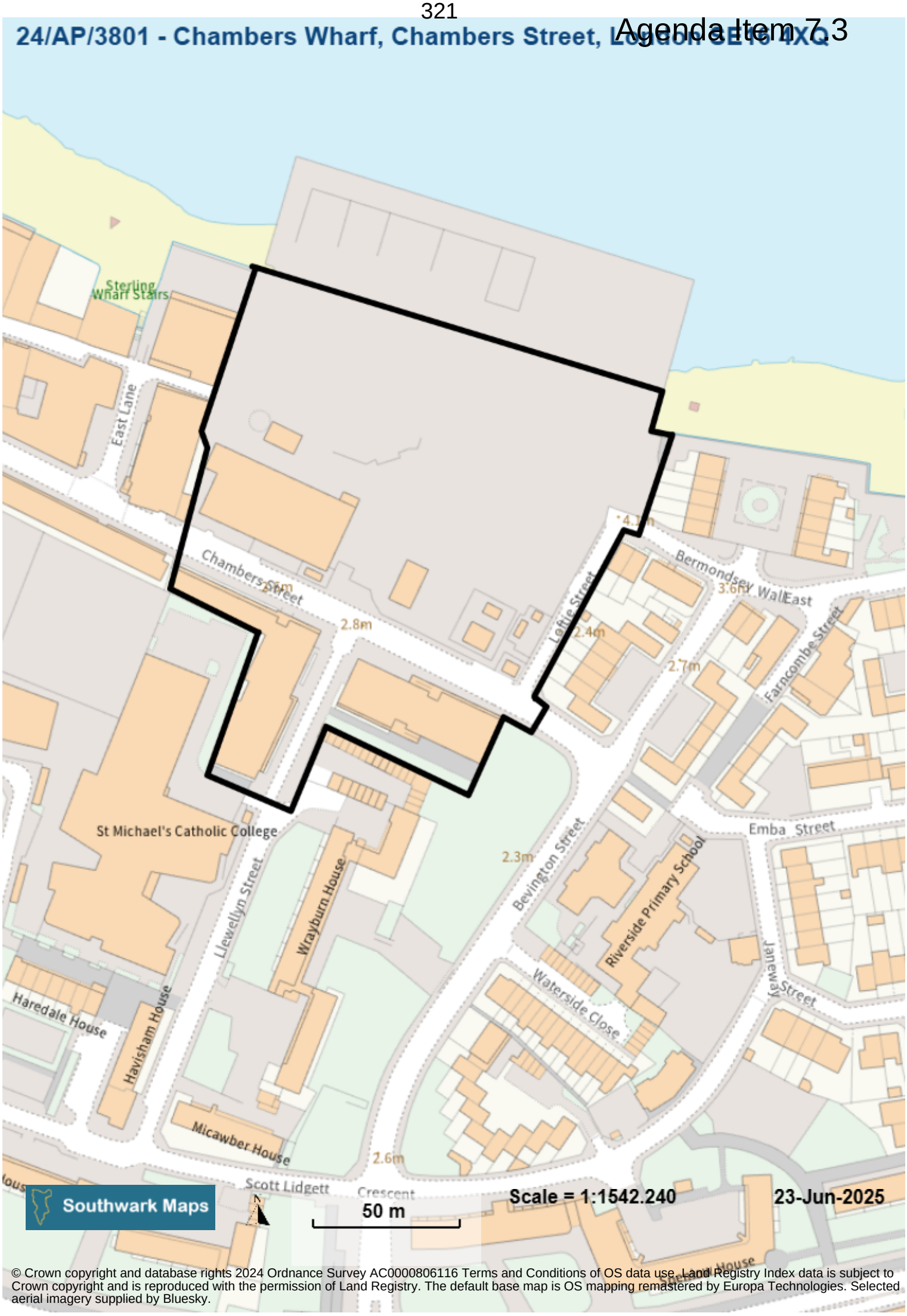
floorspace at ground floor level along Chambers Street and 203 sq. m. of Class D1 floorspace along Llewellyn Street] to allow for two additional affordable dwellings to the scheme. Withdrawn 20/10/2013.

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) B
Date:	15 July 2025
Report title:	**Development Management planning application:** Application 24/AP/3801 for: S73 Material Amendment Application **Address:** Chambers Wharf, Chambers Street, London, SE16 4XQ **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: • 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.

	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 %	111	140	115	41	407	

of total						

* 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 Spa (inc changing) 95 Swimming Pool 179 Cinema Room 43 Fitness suite 46 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

GIA changes

	Consented GIA sqm	Proposed	Change + sqm
Building A	8,691	9,920	1,229
Building B	12,249	13,900	1,651
Building C	10,165	11,757	1,592
Building D	51,57	5,354	197
Total			4,669

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 % 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	450 2 tier	670 comprising:	+220

spaces		608 2 tier (90%) 34 larger tubular stands (5.07%) 28 tubular stands (4.17%)	

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

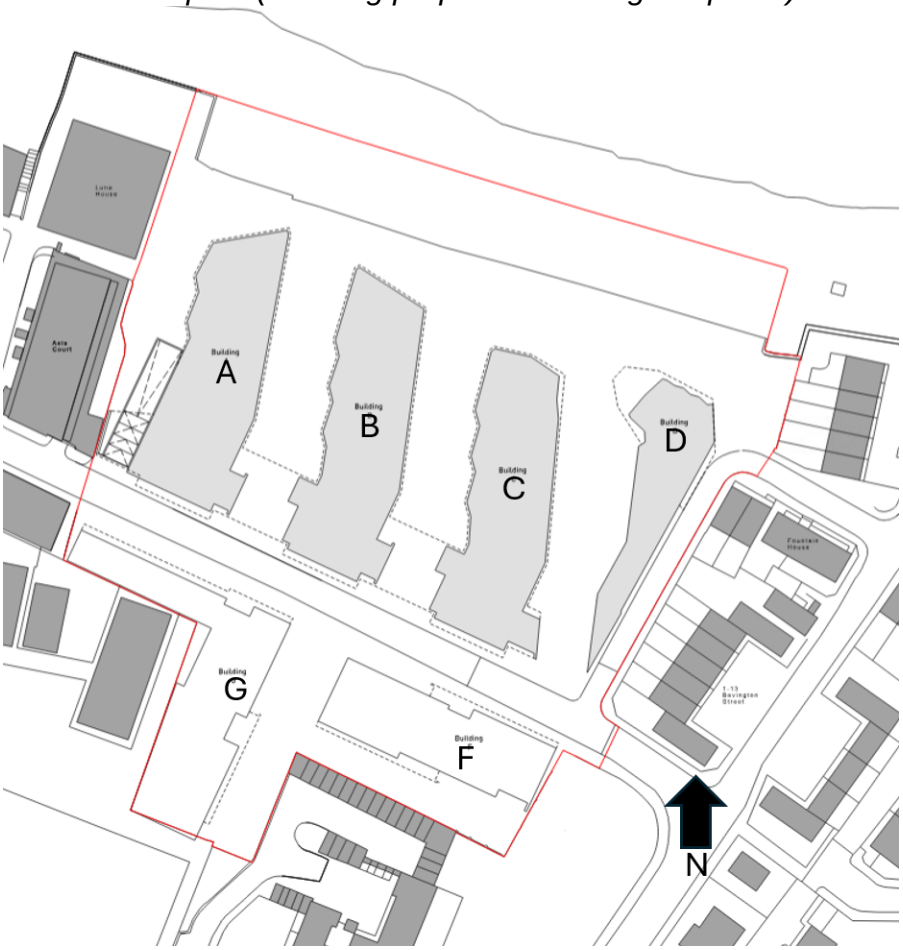
(Primrose Hill summit to St Paul's Cathedral)

- 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

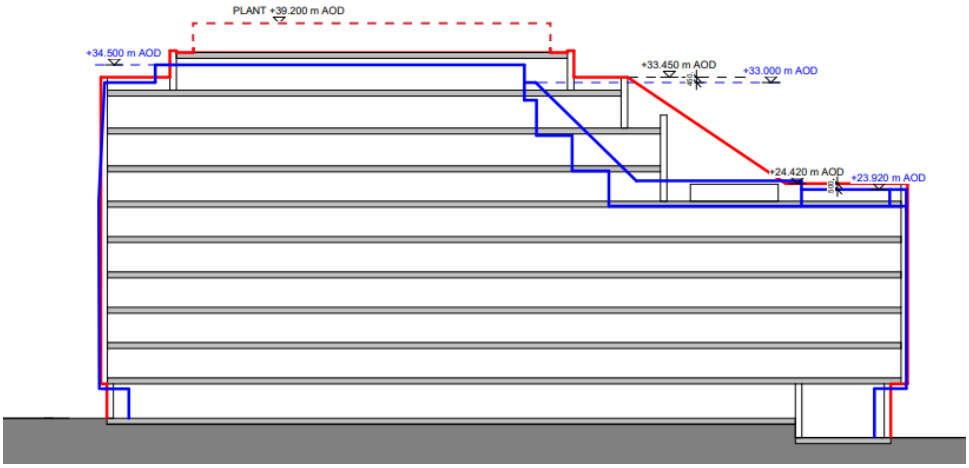


Figure 1 Height and massing increases Building A

Buidling B

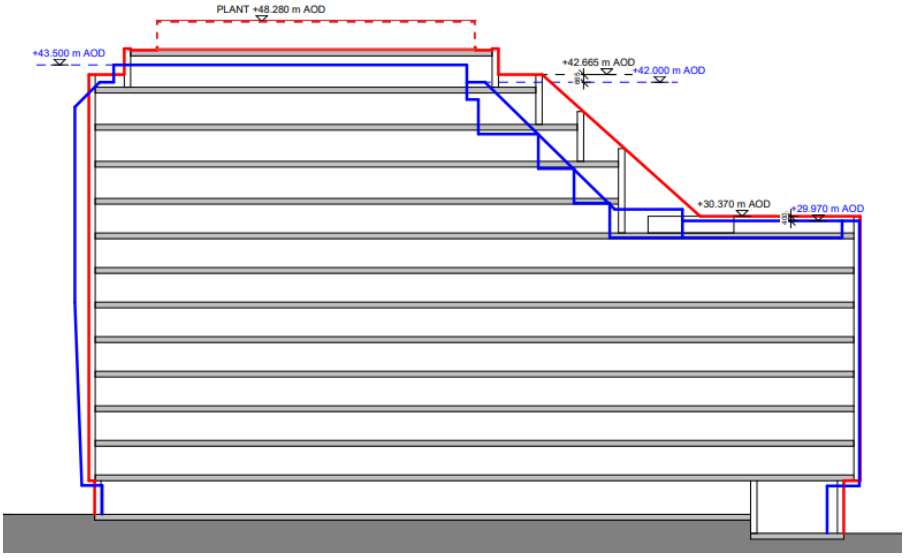


Figure 2 Height and massing increases Building B

Building C

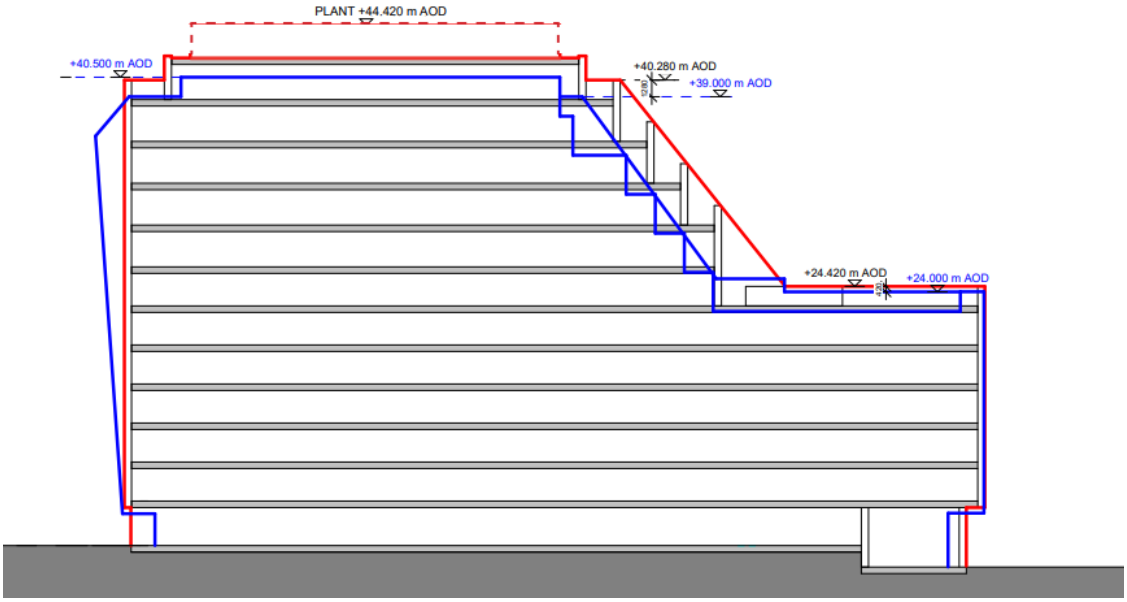


Figure 3 Height and massing increases Building C

Building D

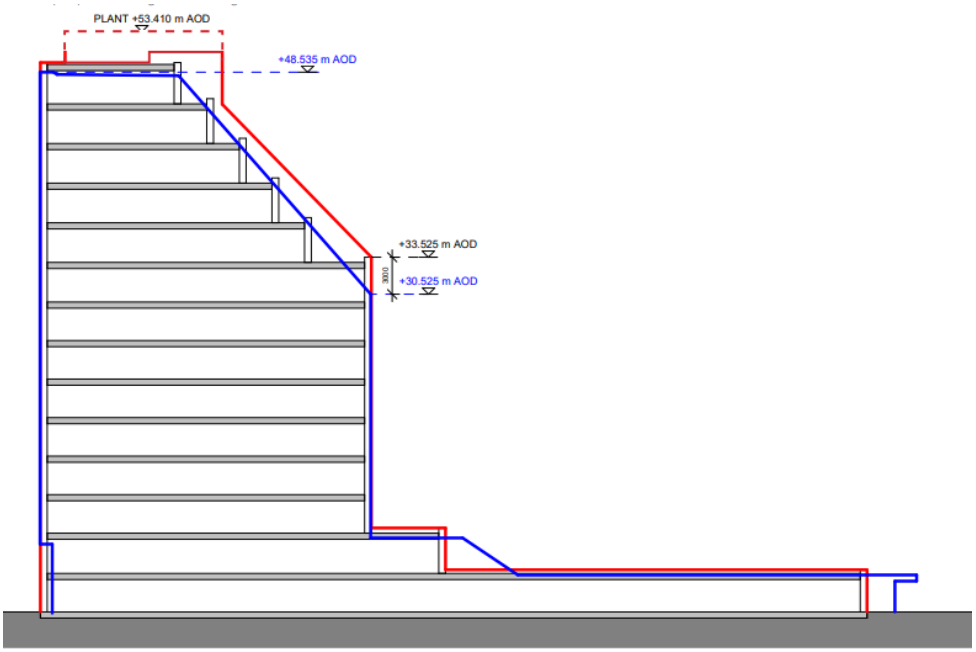
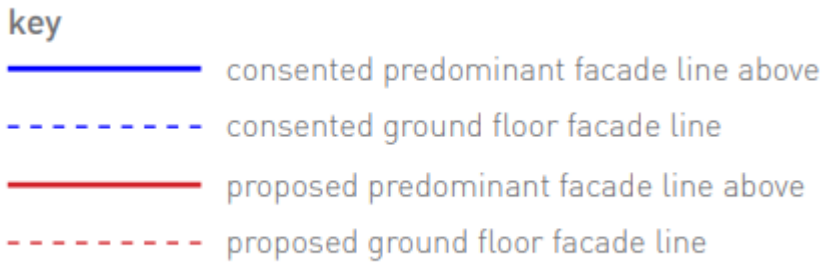


Figure 4 Height and massing increases Building D

Comparison of Consented (Blue) and Proposed Red) layout



Predominant façade lines

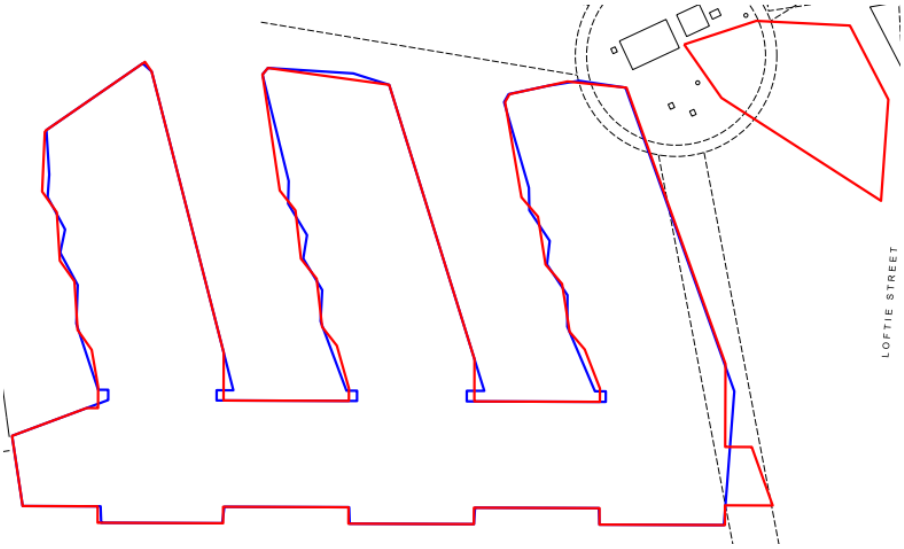


Figure 5 Updated predominant facade lines shown in red

Ground floor façade lines

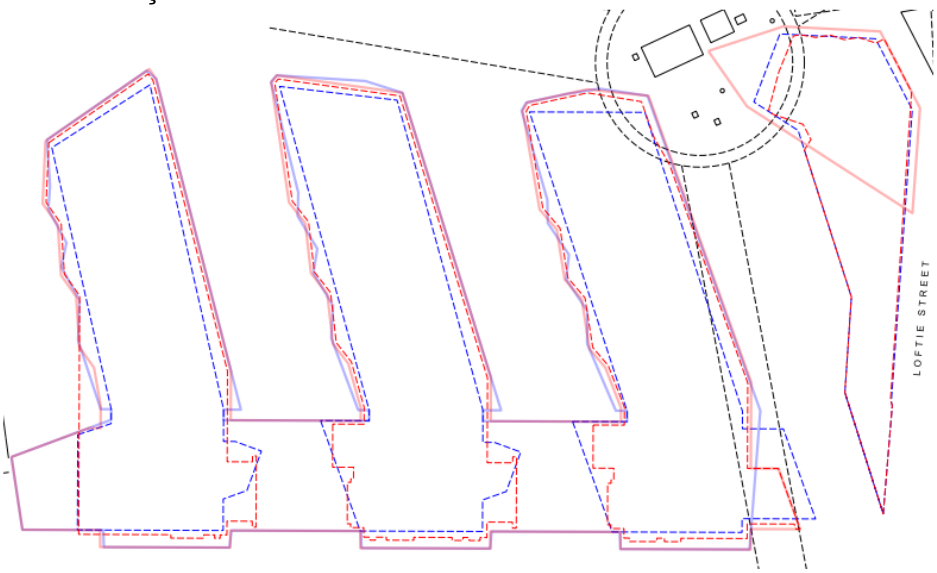


Figure 6 Updated ground floor facade lines shown in red

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 Spa (inc changing) 95 Swimming Pool 179 Cinema Room 43 Fitness suite 46 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	No

walking routes	
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 203m^2 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 by unit comprising a

tenure split of 62 intermediate units and 120 socially rented units) and 407 private (69.1% by unit)). The affordable housing is concentrated in Phase 1 (182 affordable housing units) which were completed by St James in 2015. The habitable rooms in Blocks F and G were confirmed in updated s106 documents approved under 13/AP/4266, which includes an accommodations schedule which confirms that 519 affordable habitable rooms were approved.

As a result of the proposal, the unit numbers on the site will reduce from 589 units to 566 units, and the number of private habitable rooms will decrease by 45 habitable rooms. The reduction in habitable rooms will ensure the percentage of onsite affordable is not reduced as a result of the proposed development as set out in the table below. The proposed development is acceptable as the current mix of affordable housing units and tenures have been secured by a s106 agreement and have been fully delivered on site and as there will be no net reduction in affordable housing by habitable room from the consented position. The table below shows how the percentage of affordable housing delivered would change because of the reduction in market homes.

	Affordable housing for consented scheme	Affordable housing for proposed scheme
By habitable rooms	28.9% (519 / 1791)	29.7% (519 / 1746)
By unit	30.9% (182 / 589)	32.1% (182 / 566)

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	41	56	40	13	150	36.86%	36.86%
2-bed/4p							
3-bed/4p	10	26	26	23	85	20.88%	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%	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.

<u>Quality of residential accommodation - Design, including layout, building heights, fire safety</u>

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

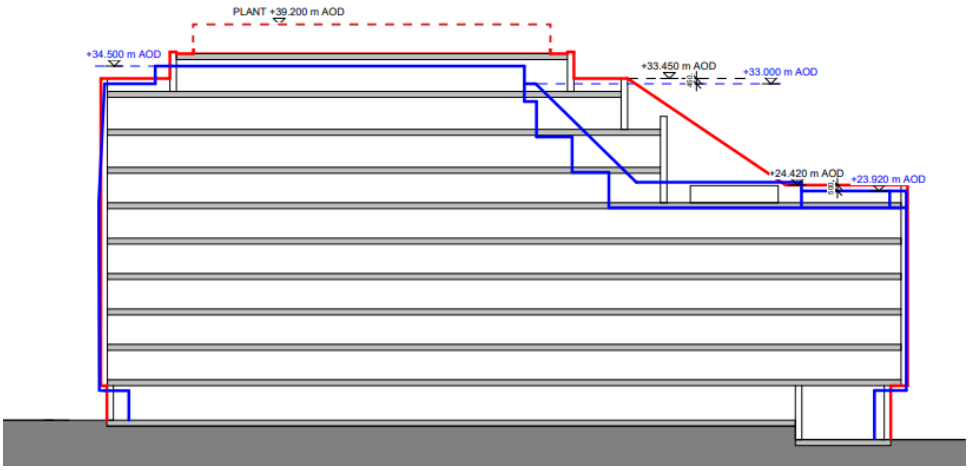


Figure 13 Height and massing increases Building A

Buidling B

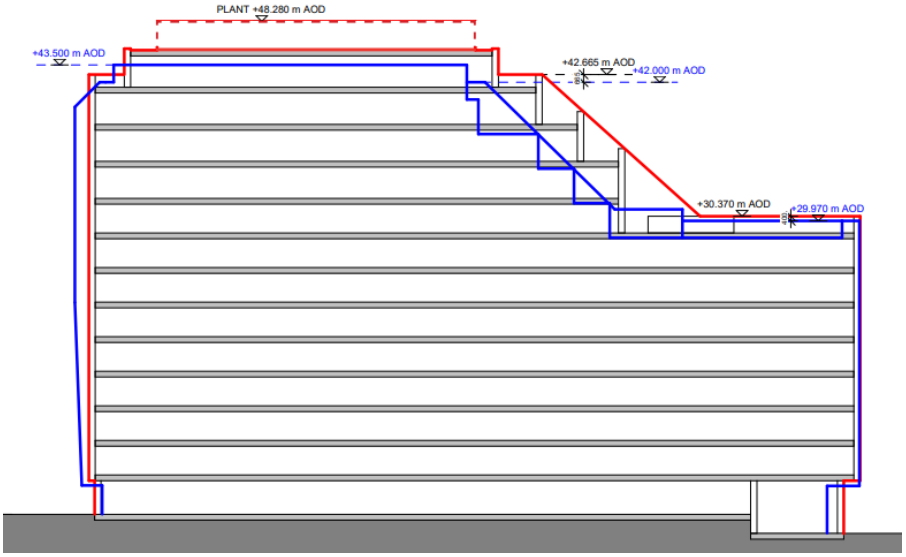


Figure 14 Height and massing increases Building B

Building C

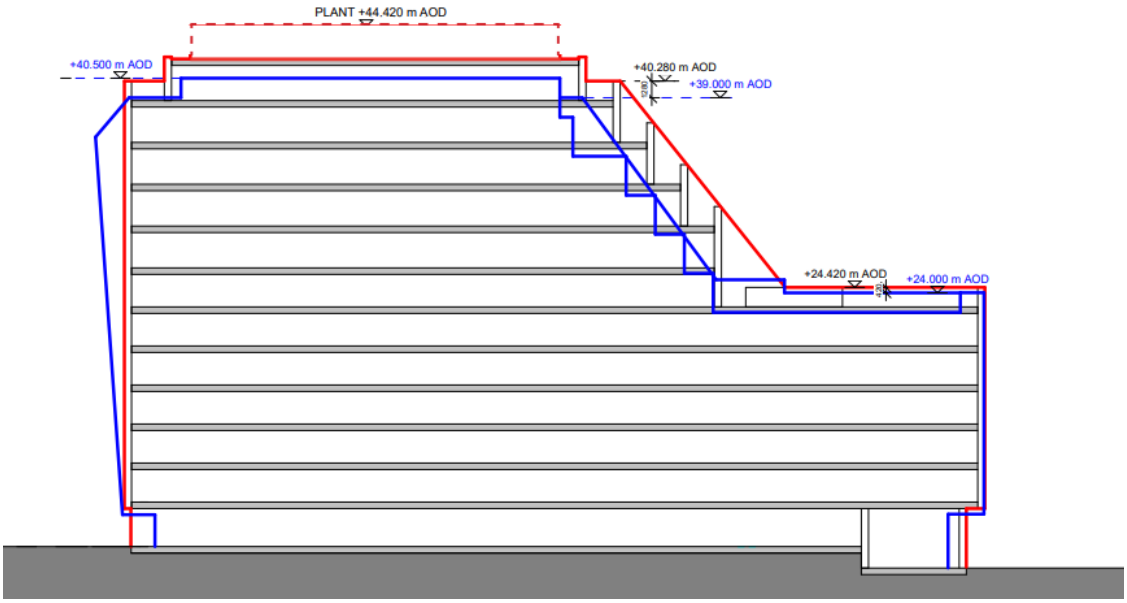


Figure 15 Height and massing increases Building C

Building D

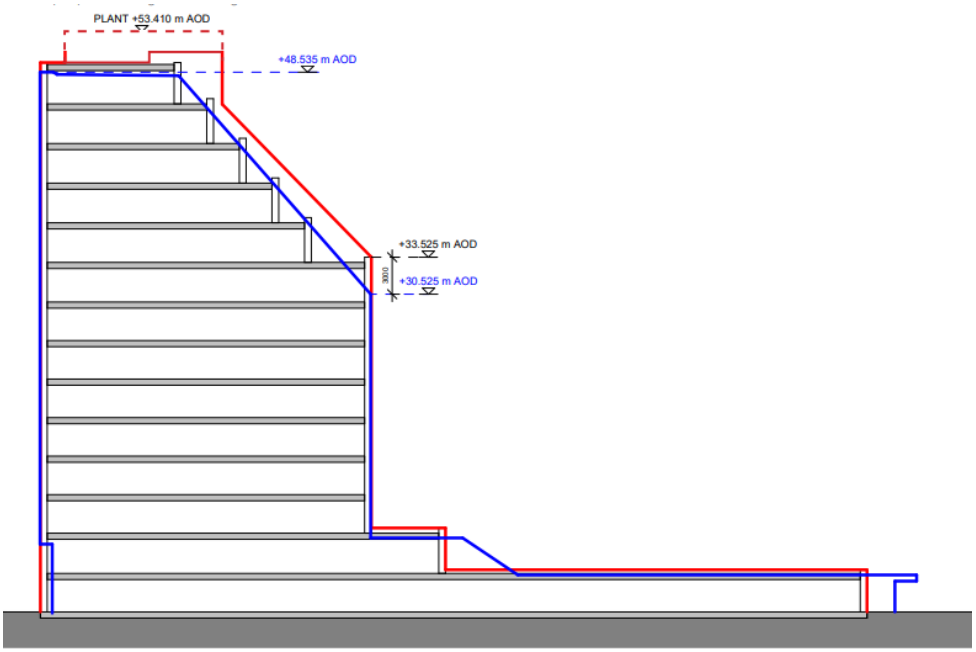


Figure 16 Height and massing increases Building D

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.

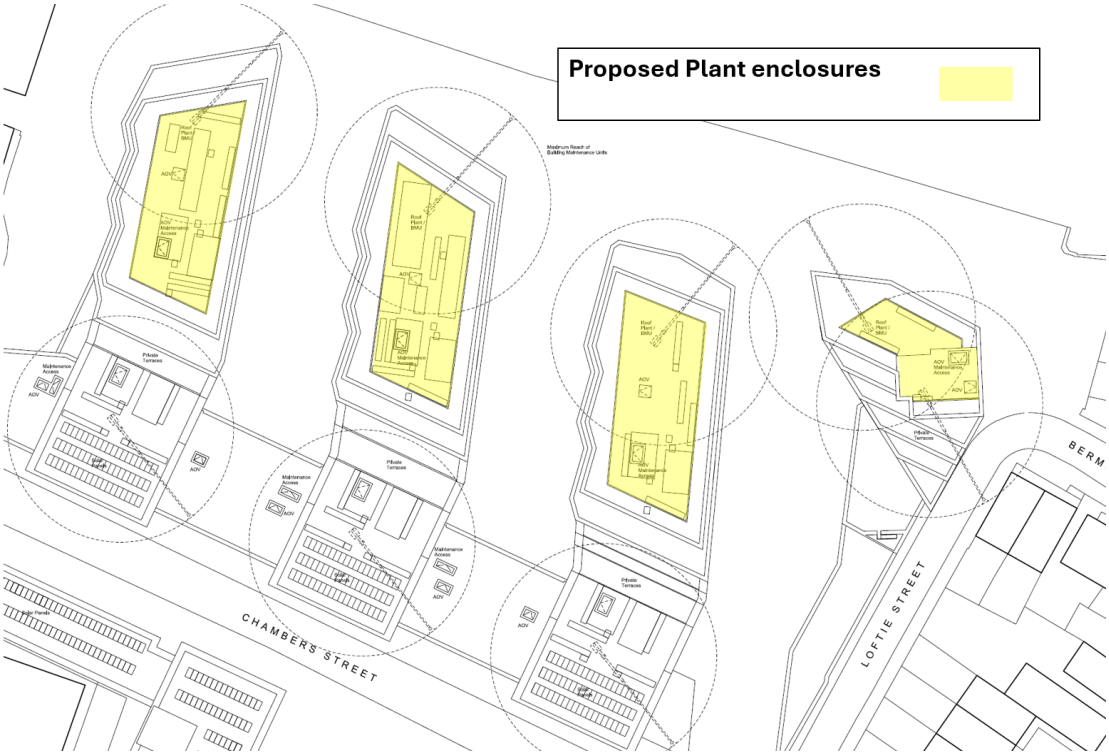


Figure 17Plant enclosures as shown on proposed plan 115 P8

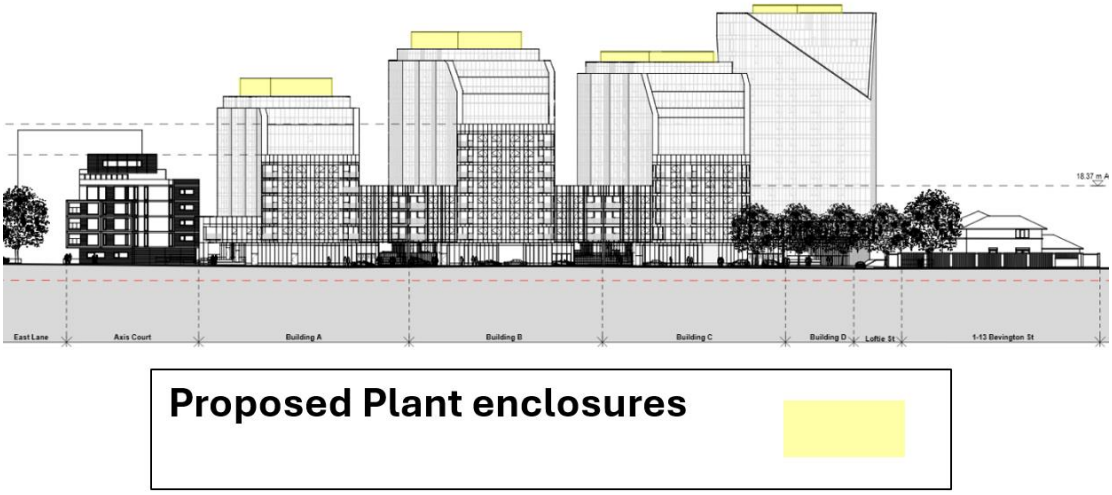


Figure 18 Plant enclosures as shown on proposed plan 031 P6

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.

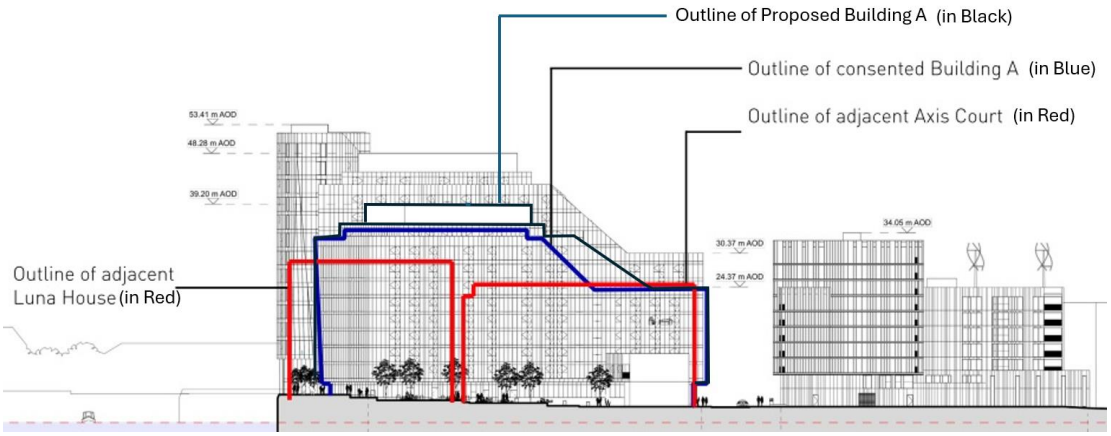


Figure 19 Building A height and massing comparison

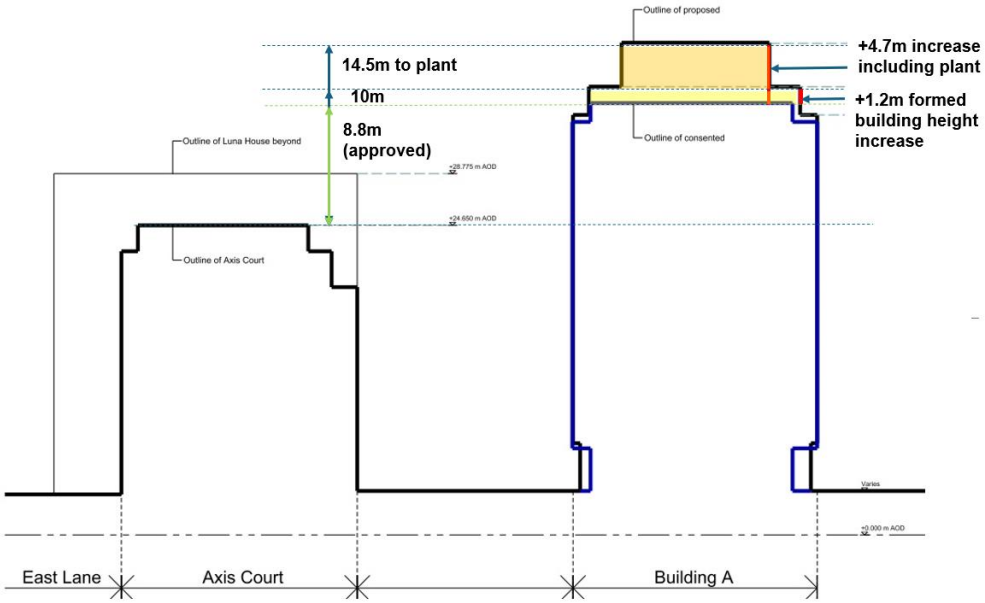


Figure 20 Building Maximum height comparison of building A to Axis Court

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.

<u>Space Standards</u>

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.

<u>Residential Amenity Space and Child Play Space</u>

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.

<u>BRE Daylight Tests</u>

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 Bermondse	**4** (4)	**4** (4)	**0** (0)	**0** (0)	**0** (0)	**4** (4)	**0** (0)	**0** (0)	**0** (0)

y Wall East									
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** (53)	**28** (37)	**1** (1)	**1** (0)	**23** (15)	**31** (42)	**0** (0)	**2** (0)	**20** (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 Fountain Green Square	**37** (37)	**37** (37)	**0** (0)	**0** (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 –

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- 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%** (0%)	**Yes** (Yes)
Axis Court Flat 32	**33%**	**26%**	**No** (No)
Axis Court Flat 30	**54%**	**54%**	**Yes** (Yes)
Axis Court Flat 30	**71%**	**71%**	**Yes** (Yes)
Axis Court Flat 56	**55%**	**55%**	**Yes** (Yes)
Axis Court Flat 56	**79%**	**79%**	**Yes** (Yes)
Axis Court Flat 57	**90%**	**89%**	**Yes** (Yes)
Axis Court Flat 33	**83%**	**83%**	**Yes**

			(Yes)
Axis Court Flat 59	**88%**	**88%**	**Yes** (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.

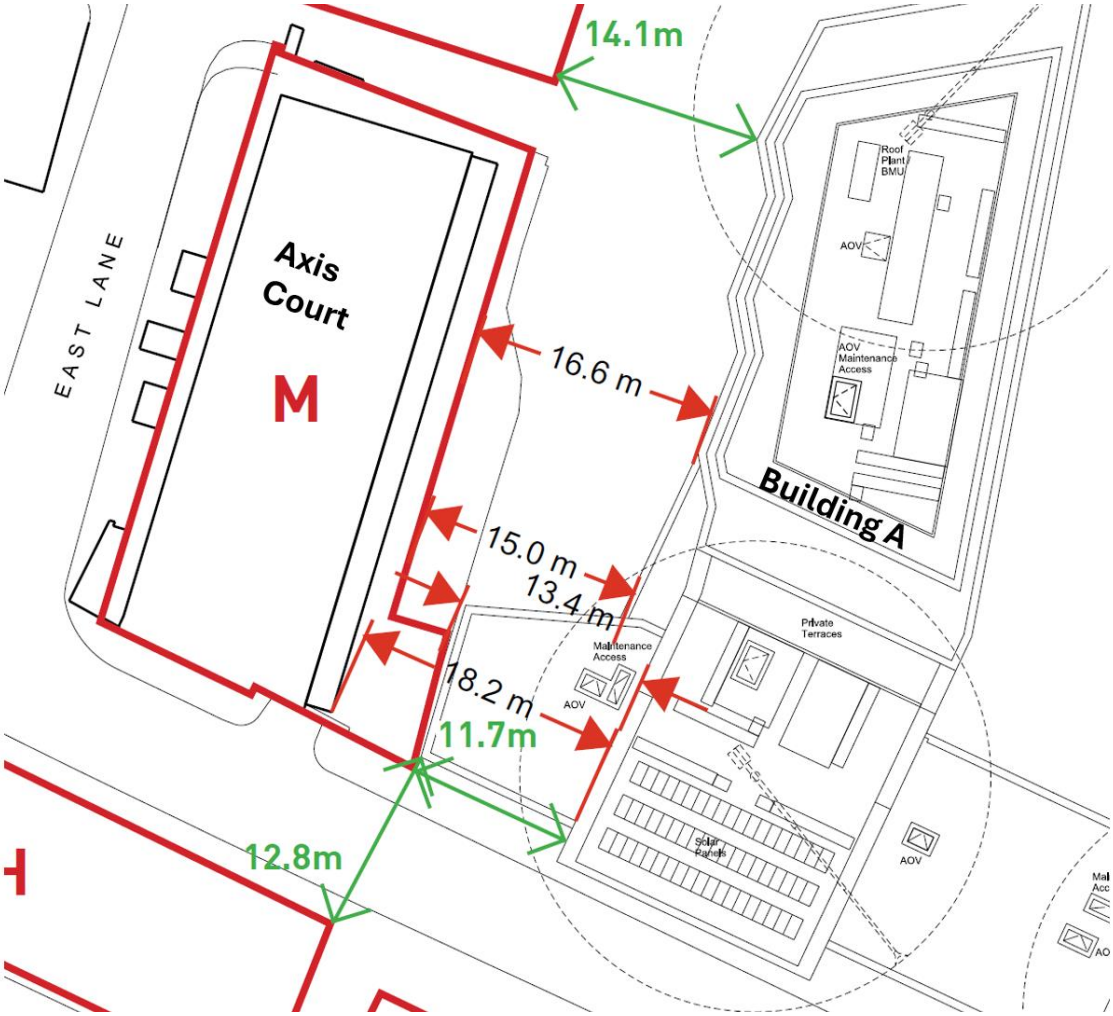


Figure 23 Separation distance between easter façade of Axis Court and Building A



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. The current s106 agreement includes provisions which restrict occupiers from being granted parking permits or other similar licenses for car parking (other than blue badge

holders). This aspect of the s106 is not subject to any proposed amendments.

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 Complies	38 Spaces Secured by condition
Commercial (food retail)	2 Spaces Secured by condition	8 Spaces Secured by condition

London Plan	Long Stay	Short Stay
food retail above 100 sqm	1 Space Secured by condition	8 Spaces Secured by condition

Residential	670 cycle parking spaces Complies	11 Spaces 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. • 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. • 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. • Maintenance arrangements. • Delivery strategy for approval to set out the phased delivery of the public realm across the site. • Provision of public access to the public realm. • 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"

234. Further to the above, and in addition to the delivery of the 182 affordable housing units in Blocks F and G, officers note that the following contributions have already been paid in full in relation to the approved s106 agreement.

Administration	£17,521.76
Archaeology	£15,024.68
Children's Play Space / Equipment	£10,4984.94
Health	£19,7038.67
Education Sum General (Primary & Secondary)	£314954.43
Traffic Management Order	£3,060.58
Historic indexation/interest	£19,699.87
Construction and Employment Contribution	£74,069.52
Community Project Bank Bermondsey	£419,939.78
Total	£1,166,294.23

Mayoral and borough community infrastructure levy (CIL)

235. 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.

236. 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.

237. 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.

238. The Proposed Development is expected to generate a MCIL contribution, as well as an LBS CIL contribution (subject to indexation and confirmation of applicable reliefs/exemptions). While the historic planning permission pre-dates CIL requirements, the development will result in increased GIA across Blocks A, B, C, and D as set out in the applicant's Design and Access Statement and the net increase would be CIL liable. 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.

239. For the purposes of CIL, this application proposes a 'phased' development, as set out in the previous CIL phasing NMAs.

Community involvement and engagement

240. 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.

241. 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.

242. The applicant has also provided a completed equalities impact assessment template in relation to the Council's development consultation charter requirements.

243. 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

244. 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.

245. 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.

246. 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:
30 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

247. The objections received from the public raised the following summarised topics in the objection comments.

Objection due to amenity concerns

- 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.

Objection to design and impacts on character, heritage, and conservation

- 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.

248. <u>Insufficient Green and Recreational Spaces and trees and inadequacy of the Thames Pathway design</u>

- 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.

249. <u>Increased Traffic and Parking Issues and concern with design</u>

- 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.

250. <u>Objection due to lack of information and or lack of consultation</u>

- 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.

251. 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.

252. <u>Objection due to consideration under s96a and request that the matter be considered at Planning Committee</u>

Officer comment: The proposal is to be considered by the Council's planning committee.

253. <u>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.</u>
- 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.

254. <u>Affordable Housing</u>
- 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

255. <u>Development mix and housing quality</u>

- 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.

256. 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.

257. 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.

258. 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.

259. 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.

260. 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.

261. 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.

262. *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

263. **London City Airport**
Summary: No conflict identified

Officer comment: Noted

264. **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.

265. **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).

266. **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.

267. **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.

268. **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.

269. **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.

270. **Thames Water:**
No objections subject to conditions.

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271. **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.

272. **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

273. **Highways Development & Management**

Summary:
No objection to footpath widths

Officer comment: Noted

274. **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.

275. **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.

276. **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

277. The Council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights

278. The Council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.

279. 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.

280. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.

281. 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).

282. 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.

283. 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

284. 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.

285. 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

286. 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.

287. 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.

288. 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.

289. 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: Application file: 24/AP/3801 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 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 0207 525 0254 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Recommendation (draft decision notice)
Appendix 2	Relevant planning policy
Appendix 3	Planning History
Appendix 4	Consultation undertaken
Appendix 5	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 Finance and Governance	No	No
Strategic Director of Environment and Leisure	No	No
Strategic Director of Housing and Modernisation	No	No
Date final report sent to Constitutional Team		4 July 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 St James Group Limited	**Reg. Number**	24/AP/3801
Application Type	S.73 Vary/Remove Conds/Minor Alterations		
Recommendation	AGREE variation	**Case Number**	PP-13659806

Draft of Decision Notice

The variation is AGREED for the following development, subject to a deed of variation to the existing s106 legal agreement and conditions of consent:

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 Blocks A, B, C, and D and associated landscape only including ammendments to the internal configuration, external design and overall massing, mix and unit numbers, and variation of the conditions of consent including to allow for:

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.

Chambers Wharf Chambers Street London SE16 4XQ

In accordance with the Applicant's Drawing Nos.:

Proposed Plans

SUBMITTED 10.03.2025 - GA BLOCK A COURTYARD DETAIL ELEVATIONS 7153-AL-PR-A-(21)-200_P3 received 11/03/2025

SUBMITTED 10.03.2025 -GA BLOCK A STREET DETAIL ELEVATION 7153-AL-PR-A-(21)-201_P4 received 11/03/2025

SUBMITTED 10.03.2025 - PROPOSED CONTEXT ELEVATIONS - N&S 7153-AL-SITE-(00)-021_P6 received 11/03/2025

SUBMITTED 10.03.2025 - PROPOSED CONTEXT ELEVATIONS 7153-AL-SITE-(00)-031_P6 received 11/03/2025

SUBMITTED 10.03.2025 - PROPOSED CONTEXT ELEVATIONS 7153-AL-SITE-(00)-041_P6 received 11/03/2025

SUBMITTED 10.03.2025 - PROPOSED CONTEXT ELEVATIONS 7153-AL-SITE-(00)-051_P5. received 11/03/2025

SUBMITTED 10.03.2025 - ELEVATIONS: NORTH 7153-AL-SITE-(00)-080_P3 received 11/03/2025

SUBMITTED 10.03.2025 - PRIVATE ELEVATIONS: SOUTH 7153-AL-SITE-(00)-081_P4 received 11/03/2025

SUBMITTED 10.03.2025 - ELEVATIONS: WEST 7153-AL-SITE-(00)-082_P5 received 11/03/2025

SUBMITTED 10.03.2025 - ELEVATIONS: EAST 7153-AL-SITE-(00)-083_P5 received 11/03/2025

SUBMITTED 10.03.2025 - AFFORDABLE ELEVATIONS: SOUTH 7153-AL-SITE-(00)-085_P7 received 11/03/2025

SUBMITTED 10.03.2025 - ELEVATION : RIVER WALK 7153-AL-SITE-(00)-086_P3 received 11/03/2025

SUBMITTED 10.03.2025 - ELEVATION: PUBLIC ROUTE ELEVATION 7153-AL-SITE-(00)-087_P3 received 11/03/2025

SUBMITTED 10.03.2025 - GA ACCESSIBLE BASEMENT FLOOR PLAN 7153-AL-SITE-(00)-098_P10 received 11/03/2025

SUBMITTED 10.03.2025 - GA GROUND FLOOR PLAN 7153-AL-SITE-(00)-100_P14. received 11/03/2025

SUBMITTED 10.03.2025 - GA FIRST FLOOR PLAN 7153-AL-SITE-(00)-101_P11 received 11/03/2025

SUBMITTED 10.03.2025 - GA FOURTH AND FIFTH FLOOR PLAN 7153-AL-SITE-(00)-104_P12 received 11/03/2025

SUBMITTED 10.03.2025 - GA SIXTH FLOOR PLAN 7153-AL-SITE-(00)-106_P7 received 11/03/2025

SUBMITTED 10.03.2025 - GA SEVENTH FLOOR PLAN 7153-AL-SITE-(00)-107_P6. received 11/03/2025

SUBMITTED 10.03.2025 - GA EIGHT FLOOR PLAN 7153-AL-SITE-(00)-108_P6 received 11/03/2025

SUBMITTED 10.03.2025 - GA NINTH FLOOR PLAN 7153-AL-SITE-(00)-109_P7 received 11/03/2025

SUBMITTED 10.03.2025 - GA TENTH FLOOR PLAN 7153-AL-SITE-(00)-110_P5 received 11/03/2025

SUBMITTED 10.03.2025 - GA ELEVENTH FLOOR PLAN 7153-AL-SITE-(00)-111_P5.PDF received 11/03/2025

SUBMITTED 10.03.2025 - GA TWELFTH FLOOR PLAN 7153-AL-SITE-(00)-112_P5 received 11/03/2025

SUBMITTED 10.03.2025 - GA THIRTEENTH FLOOR PLAN 7153-AL-SITE-(00)-113_P5 received 11/03/2025

Other Documents

SUBMITTED 10.03.2025 - PROPOSED LOCATION PLAN 7153-AL-SITE-(00)-002_P6 received 11/03/2025

SUBMITTED 10.03.2025 - PROPOSED SITE PLAN 7153-AL-SITE-(00)-011_P7. received 11/03/2025

SUBMITTED 10.03.2025 - ILLUSTRATIVE LANDSCAPE PROPOSALS 7153-AL-SITE-(00)-012_P1 received 11/03/2025

SUBMITTED 10.03.2025 - CONTEXT SECTIONS AA&BB 7153-AL-SITE-(00)-061_P4 received 11/03/2025

SUBMITTED 10.03.2025 - CONTEXT SECTIONS CC& DD 7153-AL-SITE-(00)-071_P5 received 11/03/2025

SUBMITTED 10.03.2025 - GA SECOND AND THIRD FLOOD PLAN 7153-AL-SITE-(00)-102_P9 received 11/03/2025

SUBMITTED 10.03.2025 - GA ROOF PLAN 7153-AL-SITE-(00)-115_P8 received 11/03/2025

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

2. Pedestrian 1.5M X 1.5M visibility splays
A. Prior to the commencement of the development, plans shall be submitted to the Council for approval demonstrating that pedestrian sightlines of 1.5m x 1.5m will be provided either side of the opening in the site boundary for a vehicle access from the back edge of the public highway, and not within the opening, with no features higher than 0.6m within this area.

B. Once approved, the development shall be delivered in accordance with the approved details under part A of this condition for the lifetime of the development with pedestrian 1.5M X 1.5M visibility splays provided at the vehicular entrances / exits for the development which shall be maintained clear of obstructions and any landscaping or vegetation within the visibility splays shall be maintained so that it does not exceed 0.6m in height.

Reason: In the interests of pedestrian, cyclist and highway safety in accordance with the National Planning Policy Framework (2023) and Policies P50 (Highway impacts), P51 (Walking) and P53 (Cycling) of the Southwark Plan (2022).

3. Gym Health and Fitness internal sound transfer
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/gyms/pool, 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).

Table 1. Target Levels

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,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.

An acoustic assessment including full details of the proposed noise control scheme shall be submitted to and approved by the LPA prior to commencement of the development.

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/pool in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2021.

4. Pool Ventilation

The pool use hereby permitted shall not commence until full particulars and details of a scheme for the internal ventilation of the fitness studios/gyms/pool/spa which shall include; appropriately located plant, inlets and outlets; filtration and treatment of air and a management and maintenance plan have been submitted to and approved by the LPA. The development shall be carried out in accordance with the approval given.

Reason

In order that the Local Planning Authority may be satisfied that the ventilation, ducting, filtration/treatment and ancillary equipment is incorporated as an integral part of the development in the interests of residential amenity in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P65 (Improving air quality), and the National Planning Policy Framework 2021.

5. Plant Noise

The Rated sound level from any plant, together with any associated ducting, shall not exceed the Background sound level (LA90 15min) at the nearest

noise sensitive premises. Furthermore, the Specific plant sound level shall be 10dB(A) or more below the background sound level in this location. For the purposes of this condition the Background, Rating and Specific Sound levels shall be calculated fully in accordance with the methodology of BS4142:2014+A1:2019.

Prior to operation of the plant and ASHPs, suitable acoustic treatments shall be used to ensure compliance with the above standard. Prior to occupation of the development hereby approved, a validation test shall be carried out and the results submitted to the Local Planning Authority for approval in writing to demonstrate compliance with the above standard. Once approved the plant and any acoustic treatments shall be permanently maintained thereafter.

Reason

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

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

Bedrooms - 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 based on no more than 10 exceedances per night in line with WHO/ProPG guidance

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

A. Prior to commencement of above ground works, 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.

B. 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.

C. The approved scheme shall be implemented and permanently maintained thereafter.

Reason

To ensure that the occupiers and users of the development do not suffer a loss of amenity by reason of excess noise from environmental and transportation in accordance with the Southwark Plan 2022 Policy P56

(Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2021.

7. Access and Approach
Prior to commencement of works, plans demonstrating gradients for vehicle, pedestrian and cyclists access routes around the site, in accordance with BS 8300:1 advice on length of footpaths and gradients, shall be submitted to the Council for approval in writing and the development shall be delivered in accordance with these details once approved and maintained as such for the lifetime of the development. For avoidance of doubt the submitted plans shall include:

A. Spot levels for any area of the site (whether part of a building, open space or vehicular access) at any floor level that the building will access the public highway from, to ensure that the interface with the public highway does not require any changes to the existing level of the public highway.

B. detail in terms of access to the front door of the blocks from the back edge of the public highway including spot heights and gradients;

C. passage through internal areas of buildings, including spot heights and gradients, to/from Blue Badge Bays as level as possible (near 1:1) and routes to/from larger disabled / adapted cycling parking spaces.

Reason: To ensure a high quality and accessible public realm is delivered that relates to the internal ground floor environment and adjacent highway/footway network in a safe and rational way, in accordance with: BS 8300:1 Section 8.1.4 (gradients of pedestrian/wheelchair access routes); Document M Sections 1A, 2A and 3A (approaches to dwelling); the National Planning Policy Framework 2023; Walking Plan objective 1; Policies Policy D4 (Delivering Good Design) and D5 (Inclusive Design), D8 (Public Realm), T6.1 H(5) and T2 (Healthy Streets) of the London Plan 2021; and Policies P13 (Design of Places), P14 (Design Quality), P50 (Highways impacts), P51 (Walking), P53 (Cycling) and P55 (Parking standards for disabled people and the physically impaired) of the Southwark Plan 2022.

8. Feasibility Study river transport - Unless previously discharged, prior to the commencement of development, the applicant shall submit to the Council a Feasibility Study examining options for removal of demolition spoil from the site by river transport, and for importing construction materials by the same method. The Study should include impacts on road congestion, noise and air quality, and impact on the ecology of the river, as well as the infrastructure

required to facilitate loading and unloading of materials. The Method Statement for the implementation of any preferred option shall be carried out as per the approved planning reference 12/AP/3217.

Reason

In order that the transport impacts of the demolition and construction phases of the development are minimised, in accordance with The National Planning Policy Framework 2012, Strategic Policy 2 - Sustainable Transport of The Core Strategy and saved Policy 5.2 'Transport Impacts' of the Southwark Plan 2007.

9. Commercial cycle parking and residential short-stay cycle parking

a) Notwithstanding the details shown on the approved plans, within six months of the commencement of the development details of the long-stay commercial cycle parking for the development, detailed plans, shall be submitted to and approved in writing by the Local Planning Authority. It shall provide a minimum of 2 long-stay spaces within the development. The cycle parking shall be provided in accordance with the details thereby approved prior to the occupation of the development and retained as such thereafter.

b) Notwithstanding the details shown on the approved plans, within six months of the commencement of the development revised details of the short-stay cycle parking for the development, including detailed plans and cross sections, shall be submitted to and approved in writing by the Local Planning Authority. It shall provide a minimum of 46 short-stay spaces within the development, including 8 in association with commercial uses. The cycle parking shall be provided in accordance with the details thereby approved prior to the occupation of the development and retained as such thereafter.

Reason - To promote sustainable travel and to ensure compliance with Chapter 9 (Promoting sustainable transport) of the National Planning Policy Framework (2024); Policy T5 (Cycling) of the London Plan (2021), Policy P53 (Cycling) of the Southwark Plan (2022) and Chapter 8 of the London Cycle Design Standards (2014).

10. Construction Environmental Management Plan (CEMP)

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

all best endeavours to minimise off-site impacts, and will include the following information:

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

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

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

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

-A commitment to adopt and implement of the ICE Demolition Protocol and Considerate Contractor Scheme;

- Routing of in-bound and outbound site traffic, one-way site traffic arrangements on site, location of lay off areas, etc.

Site waste Management

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

-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.

-A commitment and process, to be agreed with St Michael's Catholic College, to ensure works would not disrupt St Michael's Catholic College due to increased noise levels during public examinations from the start of May to the end of June 9am-5.30pm each year

-A commitment and process, to be agreed with St Michael's Catholic College, to ensure evacuation routes to the school's muster point in front of Wrayburn House remain free of obstructions for the duration of works

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

Southwark Council's Technical Guide for Demolition & Construction at

https://www.southwark.gov.uk/construction;

Section 61 of Control of Pollution Act 1974;

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

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

BS 5228-1:2009+A1:2014 'Code of practice for noise and vibration control on

construction and open sites. Noise';

BS 5228-2:2009+A1:2014 'Code of practice for noise and vibration control on

construction and open sites. Vibration';

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

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

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

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

Reason: To ensure that occupiers of neighbouring premises and the wider

environment do not suffer a loss of amenity by reason of pollution and nuisance, in accordance with the National Planning Policy Framework (2024); Policy P50 (Highway impacts), Policy P56 (Protection of amenity), Policy P62 (Reducing waste), Policy P64 (Contaminated land and hazardous substances), Policy P65 (Improving air quality) and Policy P66 (Reducing noise pollution and enhancing soundscapes) of the Southwark Plan (2022).

11. Wind conditions
Prior to the commencement of above grade works on the development, details of the wind conditions in the public realm on the application site and adjoining streets and on the balconies within the scheme, based on the Lawson Comfort Criteria, shall be submitted to and approved in writing by the Local Planning Authority. Any mitigation measures required will be provided in accordance with the approved details prior to the occupation of the development and retained as such thereafter.

Reason: In the interests of amenity and safety, in accordance with Policy D9

(Tall buildings) of the London Plan (2021); Policy P14 (Design quality), Policy P17 (Tall buildings) and Policy P56 (Protection of amenity) of the Southwark Plan (2022).

12. Travel Plan

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

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

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

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

13. Archaeological Evaluation

Before any work hereby authorised begins, [excluding demolition to slab level and site investigation and enabling 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.

14. Archaeological Mitigation
Before any work hereby authorised begins, [excluding archaeological evaluation, demolition to slab level, and site and enabling 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.

15. Archaeological Reporting
Within one year of the completion of the archaeological work on site, an assessment report detailing the proposals for the off-site analyses and post-excavation works, including publication of the site and preparation for deposition of the archive, shall be submitted to and approved in writing by the Local Planning Authority, and the works detailed in the assessment report shall not be carried out otherwise than in accordance with any such approval given. The assessment report shall provide evidence of 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.

16. Archaeological Public Engagement Programme
a) Prior to commencement of the development (excluding demolition and site investigation and enabling works) hereby permitted, the applicant shall submit to and receive the Local Planning Authority's approval of a Public Engagement Programme which shall set out:

1) How the field work areas will be hoarded to provide opportunities for passers-by to safely view the excavations;

2) Detailed drawings (artwork, design, text and materials, including their location and a full specification of the construction and materials) for the public interpretation and presentation display materials celebrating the historic setting of the site, which will be located on suitably visible public parts of the temporary site hoarding;

3) Details of at least one event, such as a heritage trail, that will be held during

the field work phase (as a minimum this should state the date/time, duration, individuals involved and advance promotional measures for the event, and provide an outline of the content of the event);

b) Prior to the commencement of the fieldwork phase, the hoarding shall be installed in full accordance with the LPA-approved details referred to in parts a.1 and a.2 of the condition, and the hoarding shall remain as such and in place throughout the fieldwork phase.

c) During the fieldwork phase, the event (referred to in part a.3) shall be carried out

d) Before first occupation of any part of the development, detailed drawings (artwork, design, text and materials, including their location and a full specification of the construction and materials) for the public interpretation and presentation display materials celebrating the historic setting of the site, in some form of permanent display case or signage to be installed within a publicly-accessible part of the development hereby approved. The approved display case or signage shall be installed in accordance with the approval and shall not be replaced other than with a display case or signage of similar specification and bearing the same information.

Reason: To promote the unique setting of the application site and provide information on the special archaeological and historical interest of this part of Southwark, in accordance with Policy P23 Archaeology of the Southwark Plan (2022) and the National Planning Policy Framework 2024.

17. (a) The development hereby approved shall achieve a BREEAM rating of 'Excellent' or higher, and shall achieve no less than the total credits for each of the Energy, Materials and Waste categories in the BREEAM Pre-Assessment hereby approved.
(b) Before the first occupation of the commercial elements of the buildings 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 an 'Excellent' standard has been met.

Reason: To ensure the proposal complies with the National Planning Policy Framework (2023); Policy SI 2 (Minimising Greenhouse Gas Emissions) of the London Plan (2021) and Policy P69 (Sustainability standards) and (Policy P70 (Energy) of the Southwark Plan (2022).

18. 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).

19. Ecological mitigation and enhancement scheme
A. Phase 2 of the scheme shall outline the detailed design of all ecological mitigation and enhancement measures listed within the Environment Statement Volume 2 dated May 2007 including nest boxes; . This shall include design plans and layout, materials, timings, methods of construction and species lists for planting. The works shall be undertaken in accordance with the approved details.

Reason

To protect and conserve the natural features of importance for biodiversity across the site. All planting within 16 metres of the River Thames is to be of locally appropriate native species

20. Risks associated with contamination
Unless previously discharged, prior to the commencement of development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), a scheme to deal with the risks associated with contamination of the site shall be submitted to and approved, in writing, by the local planning authority. That scheme shall include all of the following elements unless specifically excluded, in writing, by the Local Planning Authority.
1. A desk study identifying:

all previous uses

potential contaminants associated with those uses

a conceptual model of the site indicating sources, pathways and receptors

potentially unacceptable risks arising from contamination at the site.

2. A site investigation scheme, based on (1) to provide information for an assessment of the risk to all receptors that may be affected, including those off site.

3. The results of the site investigation and risk assessment (2) and a method statement based on those results giving full details of the remediation measures required and how they are to be undertaken.

4. A verification report on completion of the works set out in (3) confirming the remediation measures that have been undertaken in accordance with the method statement and setting out measures for maintenance, further monitoring and reporting.

Any changes to these agreed elements require the express consent of the Local Planning Authority.

Reason:

We recognise that part 1 of the condition is satisfied by the EIA. However the intrusive investigation in the EIA was very limited in scope. A more detailed site investigation is necessary to classify the waste soil and show the soil remaining on site does not pose a risk to controlled waters.

21. Archaeological Pre-commencement Foundation and Basement Design Condition
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.

22. Piling - Thames Tideway Tunnel requirements - 1) Construction of Buildings C and D shall not commence until details are submitted for approval to demonstrate how the piling and basement works accommodate and protect

the Thames Tideway Tunnel shaft and how the ground floor structures for the buildings remain independent of the Thames Tideway Tunnel shaft.
2) The details to be provided shall include technical assessment reports and associated construction method statements together with evidence that these reports have been independently checked. The method statements shall include piling setting out and installation controls for temporary and permanent piles and bulk excavation sequencing details.

3) The development will be undertaken in accordance with the assessments and construction method statements approved by the local planning authority who will consult with Bazalgette Tunnel Limited regarding their acceptability.

Reason: To protect the Thames Tideway Tunnel infrastructure. In addition, Tideway requests that the planning condition which secures the approval of landscape details includes Bazalgette Tunnel Limited as a consultee.

23. No piling shall take place until a Piling Method Statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan.

Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.
https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

24. No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works.

Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.
https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

25. No development shall be occupied until confirmation has been provided that either: A. all water network upgrades required to accommodate the additional demand to serve the development have been completed; or -Ba development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development
Vehicle Sightlines - A. Prior to the commencement of the development, plans shall be submitted to the Council for approval demonstrating that minimum vehicle sight lines of 2.4m x 25m for 20mph roads and 2.4m x 43.0m for 30mph roads are provided in accordance with the Manual for Streets.

B. Once approved, the development shall be delivered in accordance with the approved details under part A for the lifetime of the development.

Reason: To maintain highway safety, and as per Manual for the Streets and to ensure highway and pedestrian safety is maintained as per Southwark Plan Policy P50 and to support the objectives of promoting sustainable transport choices and maintaining pedestrian and highway safety as per Southwark Plan Policy P51, Air Quality Action Plan (Action 7.5), Streets for People objective 4 and Southwark Council Delivery Plan.

26. Refuse
Prior to the Superstructure works commencing, a waste and recycling strategy shall be submitted to and approved in writing by the Local Planning Authority. This shall set out the location, design and accessibility of refuse stores, details of the separation of waste and collection arrangements, storage of bulky waste and any chute systems or waste compactors. The waste and recycling strategy shall be implemented in each building as approved, unless otherwise agreed in writing by the Local Planning Authority. Each building shall be constructed in accordance with the approved details, the waste management facilities made available for use prior to the first occupation of each building, and managed and operated in accordance with the approved strategy for all uses in perpetuity.

Reason: To ensure adequate refuse storage is provided on site and can be readily collected, in accordance with Policies SI 7 (Reducing waste and supporting the circular economy) and SI 8 (Waste capacity and net waste self-sufficiency) of the London Plan (2021) and Policies P50 Highways impacts, P56 (Protection of amenity) and P62 (Reducing waste) of the Southwark Plan (2022).

27. Details of native planting
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. Landscape planting should strive to 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 (2023); 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).

28. 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:

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,

Laid out in accordance with roof plans; hereby approved; and

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 the Local Planning Authority agreeing the submitted plans, and once the green/brown roof(s) are completed in full in accordance to the agreed plans.

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity as well as contributing to the Urban Greening Factor requirements of the London Plan (2021) with the aim of attaining a minimum score or 0.4 for residential developments and 0.3 for commercial developments in accordance with the National Planning Policy Framework (2023); Policy G1 (Green Infrastructure), Policy G5 (Urban Greening), Policy G6 (Biodiversity and access to nature); Policy P59 (Green infrastructure) and Policy P60 (Biodiversity) of the Southwark Plan (2022).

29. Bat

(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 4; 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 (2023); Policy G1 (Green Infrastructure), Policy G5 (Urban Greening), Policy G6 (Biodiversity and access to nature) of the London Plan (2021); Policy P59 (Green infrastructure) and Policy P60 (Biodiversity) of the Southwark Plan (2022).

30. Nesting bricks

(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 6; 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 (2023); Policy G1 (Green Infrastructure), Policy G5 (Urban Greening), Policy G6 (Biodiversity and access to nature) of the London Plan (2021); Policy P59 (Green infrastructure) and Policy P60 (Biodiversity) of the Southwark Plan (2022).

31. Energy and Water Efficiency
(a) All dwellings shall be constructed in order to achieve the following requirements:

i. a revised Energy Strategy demonstrating a minimum 74% improvement in the Dwelling Emission Rate over the Target Emission Rate as defined in Part L1A of the 2021 Building Regulations (utilising SAP 10.2 Carbon Factors) shall be submitted for the Council's approval in writing;

ii. Upon acceptance of the revised Energy Strategy under part ii, the development shall be delivered in accordance with the approved revised Energy Strategy and maintained in accordance with these details for the lifetime of the development; and

iii. a reduction in potable water demand to a maximum of 105 litres per person per day.

(b) Prior to the commencement of Superstructure works of the relevant Phase or Building of the development a Design Stage Standard Assessment Procedure (SAP) Assessment and Water Efficiency calculations, prepared by suitably qualified assessors, shall have been submitted to and approved in writing by the Local Planning Authority to demonstrate that the detailed design of each dwelling is in compliance with part (a).

(c) The development shall be carried out including the measures to achieve compliance with part (a) as approved under part (b).

(d) Within 3 months of occupation of any of the residential units hereby approved (unless an extension is agreed in writing with the Local Planning Authority), an As Built SAP Assessment and post-construction stage Water Efficiency Calculations, prepared by suitably qualified assessors, shall be submitted to the Local Planning Authority for approval in writing to demonstrate full compliance with part (a) for each unit.

Reason - To comply with London Plan (2021) Policies SI 2 Minimising greenhouse gas emissions) and SI 5 (Water Infrastructure) and Policies P67 (Reducing water use) and P70 (Energy) of the Southwark Plan (2022).

32. On-site Renewable Energy Technologies - Prior to commencement of works on-site for the relevant Phase or Building the applicant must submit to the Local Planning Authority an updated roof layout drawing to demonstrate that PV generation has been maximised across the development. This should include the provision of bio-solar PV on green roof areas that are not for communal access purposes. The development shall be implemented in accordance with the approved details.

Reason - In the interests of sustainable development and in accordance with London Plan (2021) Policies SI 2 (Minimising greenhouse gas emissions) and SI 3 (Energy infrastructure) and Policy P70 (Energy) of the Southwark Plan (2022).

33. Ventilation, cooling and overheating mitigation -
Prior to the installation of the Mechanical Heat Recovery (MVHR), hybrid cooling or comfort cooling installation for a Phase or Building of the development, a detailed scheme for the proposed MVHR, any hybrid cooling and any comfort cooling system for that Phase or Building shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall specify:

(a) air intake locations and demonstrate that they shall be in areas which are not expected to exceed UK air quality objective limits for levels of NO2 concentration (40 lg/m3) and are not proposed close to any chimney/boiler flues or emergency generator exhausts.

(b) measures to prevent summer overheating and minimise energy usage, including details of thermal control (cooling) within individual residential units.

(c) details of mechanical purge ventilation function (for removing internally generated pollutants within residential units).

(d) details of the overall efficiency of the system(s) which shall at least meet the details set out in the energy strategy.

(e) detailed management plan for the relevant Mechanical Ventilation Heat Recovery system (MVHR), hybrid cooling and comfort cooling covering maintenance and cleaning, management responsibilities and a response plan

in the event of system failures or complaints.

(f) details of the back-up generator exhaust, dilution of exhaust air, dispersal and air quality impacts to the adjacent residential units.

(g) For Building ST, details of the swimming pool extract, its discharge point(s) and any associated louvres

The approved details for each Phase or Building shall then be fully implemented prior to the occupation or use of the relevant Phase or Building and retained permanently thereafter in working order for the duration of the use and occupation of the development, in accordance with the approved details.

Reason - To ensure an acceptable standard of residential amenity is provided in terms of air quality and overheating, in accordance with Policies D6 (Housing quality and standards) SI 1 Improving air quality, and SI 4 (Managing heat risk) of the London Plan (2021) and Policies P14 (Design quality), P15 (Residential design) and P69 (Sustainability standards) of the Southwark Plan (2022).

34. Circular economy - early stage - Prior to the commencement of Superstructure works for each relevant Phase or Building, a Circular Economy Statement for that Phase or Building demonstrating compliance with Part B of Policy SI7 "Reducing waste and supporting the circular economy" of the London Plan (2021) and including measures for monitoring and reporting against the targets within the Circular Economy Statement shall be submitted and approved in writing by the Local Planning Authority. The assessment shall develop a strategy for the implementation of circular economy principles in both the approved building and the wider site's operational phase, in addition to developing an end-of-life strategy for the development according to circular economy principles, including disassembly and deconstruction. The development shall be carried out in accordance with the approved details.

Reason - To promote resource conservation, waste reduction, material re-use, recycling and reduction in material being sent to land fill in compliance with Policy SI7 of the London Plan (2021).

35. Whole life carbon - early stage - Prior to the commencement of Superstructure works for each relevant Phase or Building, a Whole Life-Cycle Carbon Assessment for that Phase or Building demonstrating compliance with Part F of Policy SI2 "Minimising greenhouse gas emissions" of the London Plan (2021), shall be submitted and approved in writing by the Local Planning Authority. This assessment shall develop a strategy for the implementation of whole life cycle carbon principles in the approved development's construction, operational and demolition phases. The development shall be carried out in accordance with the approved details.

Reason - To maximise the reduction in greenhouse gas emissions and to minimise peak and annual energy demand in compliance with Policy SI2 of the London Plan (2021).

36. Secured by Design
(i) 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 the development and shall be implemented in accordance with the approved details prior to occupation.

(ii) Prior to occupation a satisfactory Secured by Design inspection must take place. The resulting Secured by Design certificate shall be submitted to and approved by the local planning authority."

Reason: In pursuance of the Local Planning Authority's duty under Section 17 of the Crime and Disorder Act (1998) to consider crime and disorder implications in exercising its planning functions and to improve community safety and crime prevention, in accordance with the National Planning Policy Framework (2023); Policy D11 (Safety Security and Resilience to Emergency) of the London Plan (2021); and Policy P16 (Designing out Crime) of the Southwark Plan (2022).

37. External facing materials
A) Notwithstanding the detail shown on approved drawings or documents, prior installation of any facade of each relevant Phase or Building, sample panels (no less than 1 metre x 1 metre) of all external facing materials to be used in the construction of the building(s) within an individual Building of each Phase shall be presented on site (or an alternative location agreed with the Local Planning Authority) and a detailed schedule of such materials submitted to the Local Planning Authority for approval in writing.

B) Prior to the installation of any facade, a full-scale mock up of a typical portion of the façade shall be presented on site (or at another location to be agreed by the Local Planning Authority) to the Local Planning Authority for approval.

The development shall not proceed other than in accordance with any such approval given.

Reason - In order that the Local Planning Authority can be satisfied that the consented development will be delivered to a high quality and makes an

appropriate contextual response to the site in accordance with the National Planning Policy Framework (2023), Policies D4 (Delivering good design) and D9 (Tall buildings) of the London Plan (2021) and Policies P13 (Design of places), P14 (Design quality) and P17 (Tall buildings) of the Southwark Plan (2022).

38. Long Stay Residential Cycle parking
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 (GA Accessible Basement Floor Plan 098 P10) 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 (2023); Policy T5 (Cycling) of the London Plan (2021); and Policy P53 (Cycling) of the Southwark Plan (2022).

41. Tree protection
Prior to the commencement of the development, details of the means by which the existing trees on the adjacent open space site, on corner of Bevington Street and Chambers Street, are to be protected from damage by vehicles, stored or stacked building supplies, waste or other materials, and building plant or other equipment shall be submitted to and approved by the Local Planning Authority before any work is begun, and such protection shall be installed and retained throughout the period of the works.

Reason

So that the Council may be satisfied that the existing trees are protected for the benefit of the whole community in the area, in accordance with Policy G7 (Trees and Woodlands) of the London Plan (2021); Policy P13 (Design of Places), Policy P14 (Design Quality), Policy P56 (Protection of Amenity), Policy P57 (Open Space), Policy P60 (Biodiversity) and P61 (Trees) of the Southwark Plan (2022).

Permission is subject to the following Grade Condition(s)

39. Section detail-drawings
Prior to the commencement of any above ground works (excluding demolition and archaeological investigation), the following details shall be submitted to the Local Planning Authority for its approval in writing: Section detail-drawings at a scale of at least 1:5 or 1:10 through:

- the facades;

- the balconies;

- parapets; and

- heads, cills and jambs of all openings.

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

Reason: In order that the Local Planning Authority may be satisfied as to the quality of the design and details in accordance with the National Planning Policy Framework (2023); Policy D4 (Delivering good design) of the London Plan (2021); Policy P13 (Design of places) and Policy P14 (Design quality) of the Southwark Plan (2022).

40. Block D Northeastern façade design at ground floor and first floor
Prior to commencement of above grade works, notwithstanding the plans hereby approved including plan 083 P5, unless otherwise agreed with Local Planning Authority, the following details shall be submitted to the Local Planning Authority for its approval in writing:

o plans for a revised façade for ground floor and first floors of the Northeastern corner of Block D (near the intersection of Loftie Street and Bermondsey Wall East) with improvements to enhance activation of the street; and

o plans for a revised interior for ground floor and first floors of the Northeastern corner of Block D (near the intersection of Loftie Street and Bermondsey Wall East) with improvements to enhance activation of the street.

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

Reason: In order that the Local Planning Authority may be satisfied as to the quality of the design and details in accordance with the National Planning Policy Framework (2023); Policy D4 (Delivering good design) of the London Plan (2021); Policy P13 (Design of places) and Policy P14 (Design quality) of the Southwark Plan (2022).

42. External lighting - Details of any external lighting [including design, power and position of luminaires] and security surveillance equipment of external areas surrounding the building shall be as approved under planning reference

13/AP/1568. The development shall thereafter not be carried out otherwise than in accordance with this permission.

Reason: In order that the Council may be satisfied as to the details of the development in the interest of the visual amenity of the area, the amenity and privacy of adjoining occupiers, and their protection from light nuisance, in accordance with the National Planning Policy Framework (2024), London Plan (2021) Policy G6 (Biodiversity and access to nature) and Policy P56 (Protection of amenity) and P60 (Biodiversity) of the Southwark Plan (2022).

43. Section detail-drawings - Unless previously discharged, 1:5/10 section detail-drawings through: the glass facades, winter gardens and terraces of the Riverside Buildings A, B, C and D; the ground and upper floor facades of Blocks F and G to be used in the carrying out of this permission shall be submitted to and approved by the Local Planning Authority prior to commencement of construction of works above ground; the development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

In order that the Local Planning Authority may be satisfied as to the design and details in accordance with the National Planning Policy Framework (2023); Policy D4 (Delivering good design) of the London Plan (2021); Policy P13 (Design of places) and Policy P14 (Design quality) of the Southwark Plan (2022).

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

44. Details of the signposting - Details of the signposting and other measures to inform members of the public of the Thames Path route and their rights of access, seating and lighting on the Thames Path, shall be submitted to and approved in writing by the local planning authority before occupation of any part of this development

Reason

In order to ensure that public access to the Thames Path is promoted as part of this development, in accordance with saved Policy 3.30 (Protection of Riverside Facilities) of the Southwark Plan (UDP) 2007.

45. Prior to any occupation of the development hereby aproved a Flood Warning and Evacuation Plan shall be submitted to and approved in writing by the Local Planning Authority. The plan should state how occupants will be made

aware that they can sign up to the Environment Agency Flood Warning services, and of the plan itself. The plan should provide details of how occupants should respond in the event that they receive a flood warning, or become aware of a flood. The report should be proportionate and risk based in terms of sources of flooding. Once approved, the measures shall remain for as long as the development is occupied.

Reason

Reason: To ensure that the development is designed to ensure safety of the building users during extreme flood events, to mitigate residual flood risk and ensure safety of the future occupants of the proposed development and to provide safe refuge and ensure safety of the future occupants of the proposed development in accordance with the National Planning Policy Framework (2023); Policy P56 (Protection of amenity) and Policy P68 (Reducing flood risk) of the Southwark Plan (2022).

46. Wildlife Friendly Lighting - 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), and because bats are known to be active in vicinity of the development site.

47. Delivery and Service Management Plan - 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)

48. Be seen

a) Prior to each building being occupied, the owner shall provide updated accurate and verified 'as-built' design estimates of the 'Be Seen' energy performance indicators for each reportable unit of the development, as per the methodology outlined in the 'As-built stage' chapter / section of the GLA 'Be Seen' energy monitoring guidance (or any document that may replace it). All data and supporting evidence should be submitted to the GLA using the 'Be Seen' as-built stage reporting webform (https://www.london.gov.uk/what-wedo/planning/implementing-london-plan/london-plan-guidance-and-spgs/be-seen-energymonitoring-guidance). The owner should also confirm that suitable monitoring devices have been installed and maintained for the monitoring of the in-use energy performance indicators, as outlined in the 'In-use stage' of the GLA 'Be Seen' energy monitoring guidance document (or any document that may replace it).

b) Upon completion of the first year of occupation or following the end of the defects liability period (whichever is the later) and at least for the following four years after that date, the owner is required to provide accurate and verified annual in-use energy performance data for all relevant indicators under each Reportable Unit of the development as per the methodology outlined in the 'In-use stage' chapter / section of the GLA 'Be Seen' energy monitoring guidance document (or any document that may replace it). All data and supporting evidence should be submitted to the GLA using the 'Be Seen' in-use stage reporting webform (https://www.london.gov.uk/what-we-do/planning/implementing-londonplan/london-plan-guidance-and-spgs/be-seen-energy-monitoring-guidance). This obligation will be satisfied after the Owner has reported on all relevant indicators included in the 'In-use stage' chapter of the GLA 'Be Seen' energy monitoring guidance document (or any document that may replace it) for at least five years.

c) In the event that the 'In-use stage' evidence submitted under Clause b) shows that the 'As-built stage' performance estimates derived from Clause a) have not been or are not being met, the Owner should investigate and identify the causes of underperformance and the potential mitigation measures and set these out in the relevant comment box of the 'Be Seen' in-use stage reporting webform. An action plan comprising measures identified in Clause b) shall be submitted to and approved in writing by the GLA, identifying measures which would be reasonably practicable to implement and a proposed timescale for implementation. The action plan and measures approved by the GLA should be implemented by the owner as soon as reasonably practicable.

Reason: To ensure that the Development responds appropriately to climate change policies by reducing carbon emissions in accordance with Policy SI2 (Minimising greenhouse gas emissions) of the London Plan (2021) and Policy P69 (Sustainability standards) and Policy P70 (Energy) of the Southwark Plan (2022)

49. Prior to the occupation of the development or any phase of the development, whichever is the sooner, a landscape management plan, including long term design objectives to meet bio diversity improvements, management responsibilities and maintenance schedules for all landscape areas, other than small, privately owned, domestic gardens, shall be submitted to and approved by the Local Planning Authority.
Details of an irrigation schedule shall be provided for all trees to ensure successful establishment.

For stem girths of up to 20cm the schedule shall be a minimum of three years, and five years for stem girths greater than 20cm. The landscape management plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the local planning authority.

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

Works shall comply to BS: 4428 Code of practice for general landscaping operations, BS: 8545 (2014) Trees: from nursery to independence in the landscape; BS3998: (2010) Tree work - recommendations; BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf); EAS 01:2021 (EN) -Tree Pruning Standard; EAS 03:2022 (EN) - Tree Planting Standard.

Reason: So that the Council may be satisfied with the details of the landscaping scheme, in accordance with: Chapters 8, 12, 15 and 16 of the National Planning Policy Framework 2021; Policies SI 4 (Managing heat risk), SI 13 (Sustainable drainage), G1 (Green Infrastructure, G5 (Urban Greening) and G7 (Trees and Woodlands) of the London Plan 2021; Policy P13 (Design of Places), Policy P14 (Design Quality), Policy P56 (Protection of Amenity), Policy P57 (Open Space), Policy P60 (Biodiversity) and P61 (Trees) of the

Southwark Plan (2022).

50. Prior to occupation, a Car Parking Management Plan relating to the relevant

building shall be submitted to and approved in writing by the relevant Local Planning

Authority, and must include at least the following details:

(a) the proposed allocation of and arrangements for the management of parking spaces including disabled parking bays. Details such as design, number and location shall be referenced.

(b) the provision of active Electric Vehicle Charging Points (EVCP), to every parking space in accordance with adopted London Plan. Details such as number and location shall be referenced.

The car parking shall be provided and managed in accordance with the approved strategy for the life of the development, or as otherwise agreed in writing by the Local Planning Authority.

Reason: Car parking management must be identified prior to the first occupation of development to ensure that sufficient off- street parking areas are provided and appropriately allocated and not to prejudice the free flow of traffic or conditions of general safety along the adjoining highway in accordance with the National Planning Policy Framework (2024); Policy T6 (Car parking) of the London Plan (2021); Policies P54 (Car parking) and P55 (Parking standards for disabled people and the physically impaired) of the Southwark Plan (2022)

Permission is subject to the following Compliance Condition(s)

1. Approved Plans - The development hereby permitted shall not be carried out otherwise than in accordance with the following approved plans:

DRAWINGS:7153 AL SITE (00): 001 P3; 002 P6; 010 P5; 011 P7; 020 P2; 021 P6; 030 P2; 031 P6; 040 P2; 041 P6; 050 P2; 051 P5; 060 P2; 061 P4; 070 P2; 071 P5; 080 P3; 081 P4; 082 P5; 083 P5; 084 P5; 085 P7; 086 P3; 087 P3; 098 P10; 100 P14; 101 P11; 102 P9; 104 P12; 106 P7; 107 P6; 108 P6; 109 P7; 110 P5; 111 P5; 112 P5; 113 P5; 115 P8; 7153 AL PR-A[21] 200 P3; 7153 AL PR-A[21] 201 P4; 7153 AL AF-F[21] 200 P3; 7153 Z4-A-G200-Section 106 4; ILLUSTRATIVE LANDSCAPE DESIGN: C306-025H; C306-027B; 306-029D; C306-030B; C306-031B; C306-032B; C306-033B; C306-034B; C306-035C; C306-036C; C306-037C; C306-038C; C306-039C; C306-040C; C306-041C; C306-042C; C306-043C; C306-044C; C306-

045A; C306-046- ; C306-048- ; C306-049-

Amended Plans as submitted under 13/AP/2182

F-A-G200-P-214 Rev B; G-A-G200-P222; 089 P1; 088 P1

Reason:

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

51. Circular economy - post-completion - No later than three months following substantial completion of the Phase or Building of the development hereby consented, a Post Completion Circular Economy Report setting out the predicted and actual performance for that Phase or Building against all numerical targets in the relevant Planning Stage Circular Economy Statement shall be submitted to and approved in writing by the Local Planning Authority.

Reason - To ensure that Planning Stage Circular Economy Statement has been implemented in the construction and delivery of the development, and that all on-going operational measures and mechanisms have been satisfactorily implemented, in order to achieve Circular Economy goals and in accordance with the National Planning Policy Framework (2021) and policies GG6 Increasing Efficiency and Resilience and SI7 Reducing Waste and Supporting the Circular Economy of the London Plan (2021).

52. Tree replacement - Any tree or shrub required to be retained or to be planted as part of a landscaping scheme approved, either as part of this decision or arising from a condition imposed as part of this decision, that is found to be dead, dying, severely damaged or seriously diseased within two years of the completion of the building works OR two years of the carrying out of the landscaping scheme (whichever is later), shall be replaced by specimens of similar or appropriate size and species in the first suitable planting season.

So that the Council may be satisfied the agreed trees will be appropriately delivered for this development, in accordance with Policy G7 (Trees and Woodlands) of the London Plan (2021); Policy P13 (Design of Places), Policy P14 (Design Quality), Policy P56 (Protection of Amenity), Policy P57 (Open Space), Policy P60 (Biodiversity) and P61 (Trees) of the Southwark Plan (2022).

53. Fire Statement - The development hereby approved shall be carried out in accordance with the recommendations of the 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) unless a

revised Fire Statement is submitted to and approved in writing by the Local Planning Authority prior to the relevant works being carried out.

Reason: To ensure that the development incorporates the necessary fire safety measures in accordance with policies D5 (Inclusive design) and D12 (Fire safety) of the London Plan (2021).

54. Finished floor levels to the car parking - 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 (2024); Policy P56 (Protection of amenity) and Policy P68 (Reducing flood risk) of the Southwark Plan (2022).

55. Demountable features - All lighting 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 in accordance with the National Planning Policy Framework (2024); Policy P56 (Protection of amenity) and Policy P68 (Reducing flood risk) of the Southwark Plan (2022).

56. Infiltration of surface water drainage - 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.

57. Phasing arrangements - The development hereby permitted shall not be carried out otherwise than in accordance with the phasing arrangements established within the associated Section 106 agreement and application 11/AP/1875 approved by the Council on 6/07/2011 namely
Phase 1 - Blocks F and G (affordable housing component),

Phase 2 - Blocks A and B,

Phase 3 - Block C, and

Phase 4 - Block D unless alternative phasing arrangements are agreed in writing by the Council. Details required to discharge each planning conditions of planning permission 07-AP-1262, as amended by subsequent applications, will be submitted separately for each phase of the development either prior to the implementation of that phase or as otherwise required for the purposes of each condition. The development or any phase thereof shall not be carried out, used or occupied other than in accordance with approved details

Reason:

To ensure that the phasing of the development is in accordance with S106 agreement.

58. The Blue Badge parking arrangements a minimum of 56 car parking spaces for the disabled (compliant to current Southwark design standards) 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 meet the requirements of Policy T6.1 (Residential Parking) of the London Plan (2021) and Policy P55 (Parking standards for disabled people and the physically impaired) of the Southwark Plan (2022).

59. The development approved by this permission provides for 384 residential units and 164 square metres of flexible Class A/B1 floorspace at ground floor level along Chambers Street, as shown on the accommodation schedule (CW Phase 2 - Accommodation Schedule Rev 11 dated 21.05.2024).

The quantum of 182 residential units and 203 square metres of Class D1 floorspace along Llewellyn Street is secured under planning permission 13/AP/4266.

Reason:

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

60. A minimum of 38 dwellings within the buildings (as shown as WAU in accommodation schedule 'CW Phase 2 - Accommodation Schedule Rev 11 dated 21.05.2024') shall be delivered as M4(3)(2)(a) 'wheelchair user dwellings' as defined in Approved Document M of the Building Regulations, and the remaining units shall all be designed to achieve the M4(2) 'accessible and adaptable' accessibility standard.
Reason - In order to ensure that new housing can be easily adapted to meet the changing needs of occupiers and that a suitable proportion of units conform to the specific needs of wheelchair users in accordance with Policies D5 (Inclusive design) and D7 (Accessible housing) of the London Plan (2021)

and Policy P8 (Wheelchair accessible and adaptable housing) of the Southwark Plan 2022.

Informatives

1 All wild birds, nests, eggs and young are protected under the Wildlife & Countryside Act 1981 (as amended). The grant of planning permission does not override the above Act. All applicants and sub-contractors are reminded that persons undertaking site clearance, hedgerow removal, demolition works etc. between March and August may risk committing an offence under the above Act and may be liable to prosecution if birds are known or suspected to be nesting. The Council will pass complaints received about such work to the appropriate authorities for investigation. The Local Authority advises that such work should be scheduled for the period 1 September-28 February wherever possible. Otherwise, a qualified ecologist should make a careful check before work begins.

2 A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Thames Water expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing wwqriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality

3 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 or planning conditions 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.

4 As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

There are public sewers crossing or close to the development. If the applicant is planning significant work near our sewers, it's important that they minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.
https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes

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

This site is affected by wayleaves and easements within the boundary of or close to the application site. Thames Water will seek assurances that these will not be affected by the proposed development. The applicant should undertake appropriate searches to confirm this. To discuss the proposed development in more detail, the applicant should contact Developer Services - https://www.thameswater.co.uk/developers
Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it

leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development
There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes

Appendix 2: Planning Policies

(Relevant policies and guidance)

National Planning Policy Framework (the Framework) 2023

The revised National Planning Policy Framework ('NPPF') was published December 2024 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 231 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 8 Promoting healthy and safe communities
- Chapter 9 Promoting sustainable transport
- Chapter 11 Making effective use of land
- Chapter 12 Achieving well-designed places
- Chapter 14 Meeting the challenge of climate change, flooding and coastal change
- Chapter 15 Conserving and enhancing the natural environment
- Chapter 16 Conserving and enhancing the historic environment

The London Plan 2021

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

- Policy SD1 - Opportunity Areas
- Policy SD4 - The Central Activities Zone (CAZ)
- Policy 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 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:

- Area Vision: AV.03 Bermondsey
- NSP15 Site Allocation Chambers Wharf
- 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
- 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: Relevant planning history **Reference and Proposal**	**Status**
07/AP/1262 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 - Major Application 08/10/2010
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	Agreed 29/12/2011

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.	Agreed 06/07/2011
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).	Agreed 08/04/2013
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.	Agreed 22/09/2015
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.	Granted with Legal Agreement 06/02/2014

Appendix 4: Consultation undertaken

Site notice date: 20/01/2025, 19/03/2024
Press notice date: 21/01/2025, 18/03/2025
Case officer site visit date: 20/01/2025, 19/03/2024
Neighbour consultation letters sent: 21/01/25, 19/03/2025, 03/06/2025, 12/06/2025

Internal services consulted

LBS Archaeologist
LBS Transport Policy Team
LBS Planning Policy [Formal Consultation] - General
LBS Highways Development & Management
LBS Building Control Division
LBS Community Infrastructure Team
LBS Network Developments Construction Management Plans
LBS Design And Conservation Team [Formal Consultation]
LBS Ecology Officer
LBS Environmental Protection Team
LBS S106 Team
Flood Risk Management & Urban Drainage Team
LBS Urban Forester
LBS Waste Management Team
LBS Ecology Officer
LBS Archaeologist
LBS Building Control Division
LBS Community Infrastructure Team
LBS Network Developments Construction Management Plans
LBS Design And Conservation Team [Formal Consultation]
LBS Ecology Officer
LBS Environmental Protection Team
LBS Highways Development & Management
LBS Planning Policy [Formal Consultation] - General
LBS S106 Team
Flood Risk Management & Urban Drainage Team
LBS Transport Policy Team
LBS Urban Forester
LBS Waste Management Team

Statutory and non-statutory organisations

Civil Aviation Authority
City Airport
Environment Agency
Fire And Emergency Department
HSE Fire Risk Assessments
London Fire & Emergency Planning Authority
Port Of London Authority
Transport For London

London Borough Of Tower Hamlets
Thames Tideway Tunnel
Thames Water
National Planning Casework Unit
Planning Casework Unit
Civil Aviation Authority
City Airport
Environment Agency
Fire And Emergency Department
HSE Fire Risk Assessments
London Fire & Emergency Planning Authority
Planning Casework Unit
National Planning Casework Unit
Port Of London Authority
Transport For London
London Borough Of Tower Hamlets
Thames Tideway Tunnel
Thames Water
Greater London Authority
Historic England

Neighbour and local groups consulted:

4E River View Heights 27 Bermondsey Wall West London
Flat 9 Oliver House Dickens Estate George Row
Flat 7 Oliver House Dickens Estate George Row
Flat 5 Oliver House Dickens Estate George Row
Flat 15 Oliver House Dickens Estate George Row
60 Farncombe Street London Southwark
54 Farncombe Street London Southwark
52 Farncombe Street London Southwark
Flat 16 Havisham House Dickens Estate Scott Lidgett Crescent
81 Jacob House Chambers Street London
76 Jacob House Chambers Street London
61 Jacob House Chambers Street London
39 Jacob House Chambers Street London
11 Jacob House Chambers Street London
7 Jacob House Chambers Street London
4 Jacob House Chambers Street London
3 Jacob House Chambers Street London
84 Hartley House Chambers Street London
50 Hartley House Chambers Street London
30 Hartley House Chambers Street London
23 Hartley House Chambers Street London
9 Hartley House Chambers Street London
8 Hartley House Chambers Street London
Flat 6 32 Bermondsey Wall West London
Flat 2 32 Bermondsey Wall West London
Flat 29 Luna House 37 Bermondsey Wall West
60 Hartley House Chambers Street London
29 Jacob House Chambers Street London
21 Hartley House Chambers Street London
4 Hartley House Chambers Street London
46 Hartley House Chambers Street London
Flat 16 Luna House 37 Bermondsey Wall West
Meridian Court 1 East Lane London
Apartment 2 22 Chambers Street

London
8 Dartle Court London Southwark
208 Bermondsey Wall East London Southwark
Flat 49 Wrayburn House Dickens Estate Llewellyn Street
Flat 34 Wrayburn House Dickens Estate Llewellyn Street
Flat 31 Wrayburn House Dickens Estate Llewellyn Street
Flat 3 Wrayburn House Dickens Estate Llewellyn Street
Flat 25 Wrayburn House Dickens Estate Llewellyn Street
Flat 17 Wrayburn House Dickens Estate Llewellyn Street
Flat 4 Haredale House Dickens Estate East Lane
Flat 10 Haredale House Dickens Estate East Lane
2 Waterside Close London Southwark
Flat 5 Fountain House Bermondsey Wall East
5C River View Heights 27 Bermondsey Wall West London
4G River View Heights 27 Bermondsey Wall West London
1B River View Heights 27 Bermondsey Wall West London
Flat 10 Oliver House Dickens Estate George Row
14 Fountain Green Square London Southwark
12 Fountain Green Square London Southwark
58 Farncombe Street London Southwark
Flat 4 Havisham House Dickens Estate Scott Lidgett Crescent
Flat 12 Havisham House Dickens Estate Scott Lidgett Crescent
79 Jacob House Chambers Street London
30 Jacob House Chambers Street London
89 Hartley House Chambers Street London
47 Hartley House Chambers Street London
39 Hartley House Chambers Street London
33 Hartley House Chambers Street London
22 Hartley House Chambers Street London
Flat 39 Luna House 37 Bermondsey Wall West
Flat 37 Luna House 37 Bermondsey Wall West
Flat 19 Luna House 37 Bermondsey Wall West
Flat 15 Luna House 37 Bermondsey Wall West
Flat 7 Luna House 37 Bermondsey Wall West
Flat 40 Meridian Court 9 Chambers Street
Flat 37 Meridian Court 9 Chambers Street
57 Jacob House Chambers Street London
8 Fountain Green Square London Southwark
Flat 10 Havisham House Dickens Estate Scott Lidgett Crescent
62 Jacob House Chambers Street London
47 Jacob House Chambers Street London
36 Jacob House Chambers Street London
22 Jacob House Chambers Street London
14 Jacob House Chambers Street London
80 Hartley House Chambers Street London
62 Hartley House Chambers Street London
48 Hartley House Chambers Street London
42 Hartley House Chambers Street London
38 Hartley House Chambers Street London
12 Hartley House Chambers Street London
Flat 35 Luna House 37 Bermondsey Wall West
Flat 30 Luna House 37 Bermondsey Wall West
Flat 20 Luna House 37 Bermondsey Wall West
Flat 42 Meridian Court 9 Chambers Street

Flat 25 Meridian Court 7 East Lane
Flat 37 Axis Court 15 Chambers Street
Apartment 9 22 Chambers Street London
Apartment 6 22 Chambers Street London
16 Chambers Street London Southwark
Flat 33 Axis Court 2 East Lane
Flat 20 Axis Court 2 East Lane
Flat 11 Axis Court 2 East Lane
23 Springview Heights 26 Bermondsey Wall West London
21 Springview Heights 26 Bermondsey Wall West London
18 Springview Heights 26 Bermondsey Wall West London
17 Springview Heights 26 Bermondsey Wall West London
16 Springview Heights 26 Bermondsey Wall West London
10 Springview Heights 26 Bermondsey Wall West London
5 Springview Heights 26 Bermondsey Wall West London
17 Hartley House Chambers Street London
42 Farncombe Street London Southwark
49 Hartley House Chambers Street London
Flat 38 Meridian Court 9 Chambers Street
44 Farncombe Street London Southwark
Flat 6 Fountain House Bermondsey Wall East
Flat 5 Havisham House Dickens Estate Scott Lidgett Crescent
Flat 17 Havisham House Dickens Estate Scott Lidgett Crescent
13 Fountain Green Square London Southwark
Flat 4 Brownlow House Dickens Estate George Row
1 Bevington Street London Southwark
Flat 11 Haredale House Dickens Estate East Lane
3I River View Heights 27 Bermondsey Wall West London
Flat 63 Wrayburn House Dickens Estate Llewellyn Street
Flat 4 Oliver House Dickens Estate George Row
Flat 40 Wrayburn House Dickens Estate Llewellyn Street
Flat 24 Wrayburn House Dickens Estate Llewellyn Street
Flat 1 Wrayburn House Dickens Estate Llewellyn Street
6F River View Heights 27 Bermondsey Wall West London
4F River View Heights 27 Bermondsey Wall West London
Flat 18 Oliver House Dickens Estate George Row
6 Tempus Wharf 29 Bermondsey Wall West London
52 Jacob House Chambers Street London
49 Jacob House Chambers Street London
38 Jacob House Chambers Street London
18 Hartley House Chambers Street London
13 Hartley House Chambers Street London
21 Jacob House Chambers Street London
90 Hartley House Chambers Street London
72 Jacob House Chambers Street London
29 Hartley House Chambers Street London
Flat 41 Luna House 37 Bermondsey Wall West
Flat 38 Luna House 37 Bermondsey Wall West
Flat 36 Luna House 37 Bermondsey Wall West
Flat 33 Luna House 37 Bermondsey Wall West
Flat 31 Luna House 37 Bermondsey Wall West
Flat 23 Luna House 37 Bermondsey Wall West
Flat 21 Luna House 37 Bermondsey Wall West
Flat 1 Luna House 37 Bermondsey Wall West
Flat 34 Meridian Court 7 East Lane
Flat 16 Meridian Court 3 East Lane
10 Dartle Court London Southwark
Flat 66 Wrayburn House Dickens Estate Llewellyn Street

Flat 59 Wrayburn House Dickens Estate Llewellyn Street
11 Bevington Street London Southwark
210 Bermondsey Wall East London Southwark
202 Bermondsey Wall East London Southwark
Flat 19 Brownlow House Dickens Estate George Row
Flat 10 Brownlow House Dickens Estate George Row
Flat 50 Wrayburn House Dickens Estate Llewellyn Street
Flat 38 Wrayburn House Dickens Estate Llewellyn Street
Flat 36 Wrayburn House Dickens Estate Llewellyn Street
Flat 13 Wrayburn House Dickens Estate Llewellyn Street
Flat 12 Wrayburn House Dickens Estate Llewellyn Street
Flat 9 Haredale House Dickens Estate East Lane
Flat 6 Haredale House Dickens Estate East Lane
Flat 7 Fountain House Bermondsey Wall East
3C River View Heights 27 Bermondsey Wall West London
2D River View Heights 27 Bermondsey Wall West London
Flat 14 Meridian Court 3 East Lane
Flat 35 Meridian Court 7 East Lane
Flat 24 Meridian Court 7 East Lane
Duffield Sluice Depot Farncombe Street London
Flat 55 Axis Court 15 Chambers Street
Apartment 4 22 Chambers Street London
Flat 14 Havisham House Dickens Estate Scott Lidgett Crescent
Flat 28 Oliver House Dickens Estate George Row
Flat 2 Oliver House Dickens Estate George Row
Flat 18 Havisham House Dickens Estate Scott Lidgett Crescent
83 Jacob House Chambers Street London
42 Jacob House Chambers Street London
17 Jacob House Chambers Street London
6 Jacob House Chambers Street London
76 Hartley House Chambers Street London
31 Hartley House Chambers Street London
Flat 42 Luna House 37 Bermondsey Wall West
Flat 32 Luna House 37 Bermondsey Wall West
Flat 27 Luna House 37 Bermondsey Wall West
Flat 12 Luna House 37 Bermondsey Wall West
Flat 4 Luna House 37 Bermondsey Wall West
Flat 36 Meridian Court 7 East Lane
Flat 15 Meridian Court 3 East Lane
Flat 36 Axis Court 15 Chambers Street
26 Chambers Street London Southwark
Apartment 14 22 Chambers Street London
Apartment 10 22 Chambers Street London
14 Chambers Street London Southwark
3 Tempus Wharf 29 Bermondsey Wall West London
Flat 27 Axis Court 2 East Lane
Flat 25 Axis Court 2 East Lane
Flat 24 Axis Court 2 East Lane
Flat 15 Axis Court 2 East Lane
21 Tempus Wharf 33 Bermondsey Wall West London
Flat 32 Axis Court 2 East Lane
Flat 30 Axis Court 2 East Lane
Flat 14 Axis Court 2 East Lane
Flat 10 Axis Court 2 East Lane
18 Tempus Wharf 33 Bermondsey Wall West London
14 Tempus Wharf 33 Bermondsey Wall West London
Flat 27 Meridian Court 7 East Lane
Flat 9 Meridian Court 3 East Lane
2 Fountain Green Square London Southwark
12 Chambers Street London Southwark
5B River View Heights 27 Bermondsey Wall West London
Flat 56 Wrayburn House Dickens Estate Llewellyn Street
2E River View Heights 27 Bermondsey Wall West London

Flat 1 Haredale House Dickens Estate East Lane
9 Jacob House Chambers Street London
65 Jacob House Chambers Street London
Flat 46 Luna House 37 Bermondsey Wall West
9 Fountain Green Square London Southwark
5 Bevington Street London Southwark
Flat 18 Wrayburn House Dickens Estate Llewellyn Street
Flat 51 Axis Court 15 Chambers Street
46 Jacob House Chambers Street London
Flat 8 Fountain House Bermondsey Wall East
Flat 18 Brownlow House Dickens Estate George Row
3G River View Heights 27 Bermondsey Wall West London
Flat 37 Wrayburn House Dickens Estate Llewellyn Street
Flat 30 Wrayburn House Dickens Estate Llewellyn Street
Flat 8 Wrayburn House Dickens Estate Llewellyn Street
6I River View Heights 27 Bermondsey Wall West London
5A River View Heights 27 Bermondsey Wall West London
24 Chambers Street London Southwark
Flat 2 Luna House 37 Bermondsey Wall West
58 Jacob House Chambers Street London
41 Jacob House Chambers Street London
32 Jacob House Chambers Street London
27 Jacob House Chambers Street London
10 Hartley House Chambers Street London
88 Hartley House Chambers Street London
79 Hartley House Chambers Street London
87 Jacob House Chambers Street London
84 Jacob House Chambers Street London
75 Jacob House Chambers Street London
23 Tempus Wharf 33 Bermondsey Wall West London
20 Tempus Wharf 33 Bermondsey Wall West London
Flat 13 Luna House 37 Bermondsey Wall West
Flat 13 Meridian Court 3 East Lane
Flat 8 Axis Court 2 East Lane
Flat 2 Axis Court 2 East Lane
11 Tempus Wharf 33 Bermondsey Wall West London
15 Springview Heights 26 Bermondsey Wall West London
11 Springview Heights 26 Bermondsey Wall West London
Flat 12 Haredale House Dickens Estate East Lane
7 Butterfield Close London Southwark
Apartment 12 22 Chambers Street London
44 Hartley House Chambers Street London
Flat 17 Luna House 37 Bermondsey Wall West
Flat 31 Meridian Court 7 East Lane
Flat 61 Wrayburn House Dickens Estate Llewellyn Street
3D River View Heights 27 Bermondsey Wall West London
7 Fountain Green Square London Southwark
80 Jacob House Chambers Street London
Flat 10 Meridian Court 3 East Lane
Flat 4 94A Bermondsey Wall East London
4B River View Heights 27 Bermondsey Wall West London
Flat 3 Havisham House Dickens Estate Scott Lidgett Crescent
Flat 13 Havisham House Dickens Estate Scott Lidgett Crescent
9 Bevington Street London Southwark
2C River View Heights 27 Bermondsey Wall West London
1F River View Heights 27 Bermondsey Wall West London
1D River View Heights 27 Bermondsey Wall West London
Flat 5 Haredale House Dickens Estate

East Lane
200 Bermondsey Wall East London Southwark
Flat 26 Wrayburn House Dickens Estate Llewellyn Street
Flat 16 Oliver House Dickens Estate George Row
8 Waterside Close London Southwark
71 Hartley House Chambers Street London
54 Hartley House Chambers Street London
1 Tempus Wharf 29 Bermondsey Wall West London
2 Springview Heights 26 Bermondsey Wall West London
58 Hartley House Chambers Street London
37 Jacob House Chambers Street London
7D River View Heights 27 Bermondsey Wall West London
25 Jacob House Chambers Street London
Flat 22 Oliver House Dickens Estate George Row
55 Jacob House Chambers Street London
93 Hartley House Chambers Street London
Flat 39 Meridian Court 9 Chambers Street
30 Bermondsey Wall West London Southwark
Flat 3 94A Bermondsey Wall East London
Flat 28 Axis Court 2 East Lane Rotherithe
22 Axis Court London SE16 4UQ
26 Hartley House Chambers Street London
Flat 8 Hampton Court Rotherhithe Street London
6 Mitchell Gardens Slinfold Horsham
10 Fountain Green Square London SE16 4TX
Flat 7 Springalls Wharf, 25 Bermondsey Wall West London SE16 4TL
London River House Royal Pier Road Gravesend, Kent
Flat 2, Fountain House Bermondsey Wall East London
43 Axis Court 15 Chambers Street Bermondsey London
184 Bermondsey Wall East London SE16 4TT
Flat 50 Axis Court London Se164wg
38 Axis Court 15 Chambers Street Bermondsey London
Unit 6 139-143 Bermondsey Street London
15 Axis Court 2 East Lane London
56 Axis Court 15 Chambers Street London
Flat 47 Axis Court 15 Chambers Street London
91 Hartley House Chambers Street London
87 Hartley House Chambers Street London
6 Mitchell Gardens Slinfold Horsham
Flat 52, Axis Court Chanmber Street London
46 Farncombe Street London SE16 4pt
Flat 26 Axis Court London Se16 4UQ
9 AXIS COURT 2 EAST LANE LONDON
17 Axis Court London London
6, Mitchell Gardens Horsham RH13 0TY
12 Meridian Court 3 East Lane London
35 Axis Court Southwark London
34 Chanctonbury Chase Redhill Rh1 4BB
8 Fountain Green Square, Bermondsey Wall East, Rotherhthe,
10 Luna House 37 Bermondsey Wall West London
56 Jacob House Chambers Street London
17 Axis Court East Lane London
28 Meridian Court London Se16 4uf
Flat 80 Hartley House Chambers Street London
26 Tempus Wharf 33 Bermondsey Wall West London
12 Tempus Wharf 33 Bermondsey Wall West London
Luna House 35 Bermondsey Wall West London
3 Springview Heights 26 Bermondsey Wall West London
7B River View Heights 27 Bermondsey Wall West London
Flat 41 Axis Court 15 Chambers Street
2 Tempus Wharf 29 Bermondsey Wall

West London
Flat 56 Axis Court 15 Chambers Street
Apartment 11 22 Chambers Street London
12 Dartle Court London Southwark
4 Bevington Street London Southwark
Flat 6 Brownlow House Dickens Estate George Row
Flat 3 Brownlow House Dickens Estate George Row
Flat 53 Wrayburn House Dickens Estate Llewellyn Street
5 Waterside Close London Southwark
10 Waterside Close London Southwark
1 Waterside Close London Southwark
Flat 9 Fountain House Bermondsey Wall East
6J River View Heights 27 Bermondsey Wall West London
6E River View Heights 27 Bermondsey Wall West London
6C River View Heights 27 Bermondsey Wall West London
5H River View Heights 27 Bermondsey Wall West London
4J River View Heights 27 Bermondsey Wall West London
3H River View Heights 27 Bermondsey Wall West London
3E River View Heights 27 Bermondsey Wall West London
Flat 1 Fountain House Bermondsey Wall East
6 Fountain Green Square London Southwark
Flat 2 94A Bermondsey Wall East London
89 Jacob House Chambers Street London
82 Jacob House Chambers Street London
68 Jacob House Chambers Street London
50 Jacob House Chambers Street London
40 Jacob House Chambers Street London
34 Jacob House Chambers Street London
20 Jacob House Chambers Street London
12 Jacob House Chambers Street London
1 Jacob House Chambers Street London
81 Hartley House Chambers Street London
67 Hartley House Chambers Street London
66 Hartley House Chambers Street London
59 Hartley House Chambers Street London
51 Hartley House Chambers Street London
36 Hartley House Chambers Street London
14 Hartley House Chambers Street London
Flat 24 Luna House 37 Bermondsey Wall West
Flat 30 Meridian Court 7 East Lane
Flat 18 Meridian Court 3 East Lane
Flat 45 Axis Court 15 Chambers Street
Flat 39 Axis Court 15 Chambers Street
Flat 31 Axis Court 2 East Lane
Flat 4 Axis Court 2 East Lane
26 Tempus Wharf 33 Bermondsey Wall West London
25 Tempus Wharf 33 Bermondsey Wall West London
Flat 3 32 Bermondsey Wall West London
Cpct Liberty Catering Thames Tidal Tunnel Land Chambers Street
7A River View Heights 27 Bermondsey Wall West London
5 Hartley House Chambers Street London
Flat 54 Axis Court 15 Chambers Street
85 Jacob House Chambers Street London
45 Jacob House Chambers Street London
77 Hartley House Chambers Street London
4H River View Heights 27 Bermondsey Wall West London
10 Fountain Green Square London Southwark
Flat 9 Brownlow House Dickens Estate George Row
6 Bevington Street London Southwark
2G River View Heights 27 Bermondsey Wall West London
Flat 35 Wrayburn House Dickens Estate

Llewellyn Street
Flat 32 Wrayburn House Dickens Estate Llewellyn Street
5F River View Heights 27 Bermondsey Wall West London
4I River View Heights 27 Bermondsey Wall West London
60 Jacob House Chambers Street London
26 Hartley House Chambers Street London
24 Jacob House Chambers Street London
85 Hartley House Chambers Street London
68 Hartley House Chambers Street London
65 Hartley House Chambers Street London
66 Jacob House Chambers Street London
43 Hartley House Chambers Street London
32 Hartley House Chambers Street London
Flat 6 Luna House 37 Bermondsey Wall West
Flat 41 Meridian Court 9 Chambers Street
18 Chambers Street London Southwark
Flat 59 Axis Court 15 Chambers Street
Apartment 13 22 Chambers Street London
Flat 43 Axis Court 15 Chambers Street
9 Dartle Court London Southwark
Riverside Primary School Janeway Street London
10 Bevington Street London Southwark
Flat 5 Brownlow House Dickens Estate George Row
Flat 2 Brownlow House Dickens Estate George Row
Flat 28 Wrayburn House Dickens Estate Llewellyn Street
6B River View Heights 27 Bermondsey Wall West London
4C River View Heights 27 Bermondsey Wall West London
4A River View Heights 27 Bermondsey Wall West London
2H River View Heights 27 Bermondsey Wall West London
1H River View Heights 27 Bermondsey Wall West London
11 Fountain Green Square London Southwark
59 Jacob House Chambers Street London
51 Jacob House Chambers Street London
33 Jacob House Chambers Street London
94 Hartley House Chambers Street London
22 Tempus Wharf 33 Bermondsey Wall West London
10 Chambers Street London Southwark
15 Tempus Wharf 33 Bermondsey Wall West London
Flat 8 Luna House 37 Bermondsey Wall West
Flat 23 Meridian Court 7 East Lane
Flat 21 Meridian Court 7 East Lane
Flat 19 Meridian Court 3 East Lane
28 Chambers Street London Southwark
Flat 69 Wrayburn House Dickens Estate Llewellyn Street
Flat 67 Wrayburn House Dickens Estate Llewellyn Street
Flat 62 Wrayburn House Dickens Estate Llewellyn Street
Flat 17 Brownlow House Dickens Estate George Row
Flat 51 Wrayburn House Dickens Estate Llewellyn Street
Flat 15 Wrayburn House Dickens Estate Llewellyn Street
Flat 14 Haredale House Dickens Estate East Lane
3 Bevington Street London Southwark
Old Justice 94 Bermondsey Wall East London
6G River View Heights 27 Bermondsey Wall West London
5G River View Heights 27 Bermondsey Wall West London
2J River View Heights 27 Bermondsey Wall West London
Flat 4 Fountain House Bermondsey Wall East
Flat 26 Oliver House Dickens Estate George Row
Flat 24 Oliver House Dickens Estate George Row

Flat 23 Oliver House Dickens Estate George Row
Flat 14 Oliver House Dickens Estate George Row
5 Fountain Green Square London Southwark
Flat 7 Havisham House Dickens Estate Scott Lidgett Crescent
88 Jacob House Chambers Street London
74 Jacob House Chambers Street London
64 Jacob House Chambers Street London
Flat 3 Burnaby Court 1 Scott Lidgett Crescent
14 Waterside Close London Southwark
11 Waterside Close London Southwark
13 Waterside Close London Southwark
Flat 9 Burnaby Court 1 Scott Lidgett Crescent
Flat 6 Burnaby Court 1 Scott Lidgett Crescent
Flat 4 Burnaby Court 1 Scott Lidgett Crescent
Flat 2 Burnaby Court 1 Scott Lidgett Crescent
Flat 1 Burnaby Court 1 Scott Lidgett Crescent
1 Dartle Court London Southwark
3 Dartle Court London Southwark
7 Dartle Court London Southwark
6 Dartle Court London Southwark
5 Dartle Court London Southwark
4 Dartle Court London Southwark
2 Dartle Court London Southwark
30 Emba Street London Southwark
28 Emba Street London Southwark
26 Emba Street London Southwark
73 Hartley House Chambers Street London
70 Hartley House Chambers Street London
41 Hartley House Chambers Street London
6 Hartley House Chambers Street London
2 Hartley House Chambers Street London
Flat 5 32 Bermondsey Wall West London
Flat 45 Luna House 37 Bermondsey Wall West
Flat 9 Luna House 37 Bermondsey Wall West
Flat 33 Meridian Court 7 East Lane
Flat 22 Meridian Court 7 East Lane
Flat 11 Meridian Court 3 East Lane
Flat 57 Axis Court 15 Chambers Street
Flat 52 Axis Court 15 Chambers Street
Flat 42 Axis Court 15 Chambers Street
Flat 34 Axis Court 15 Chambers Street
20 Chambers Street London Southwark
13 Tempus Wharf 33 Bermondsey Wall West London
Flat 19 Axis Court 2 East Lane
Flat 13 Axis Court 2 East Lane
Flat 7 Axis Court 2 East Lane
Flat 1 Meridian Court 3 East Lane
17 Tempus Wharf 33 Bermondsey Wall West London
22 Springview Heights 26 Bermondsey Wall West London
20 Springview Heights 26 Bermondsey Wall West London
7 Springview Heights 26 Bermondsey Wall West London
19 Chambers Street London Southwark
86 Jacob House Chambers Street London
77 Jacob House Chambers Street London
Flat 47 Axis Court 15 Chambers Street
82 Hartley House Chambers Street London
Flat 2 Wrayburn House Dickens Estate Llewellyn Street
8 Jacob House Chambers Street London
Flat 60 Wrayburn House Dickens Estate Llewellyn Street
Flat 6 Wrayburn House Dickens Estate Llewellyn Street
Flat 44 Wrayburn House Dickens Estate Llewellyn Street
Flat 7 Brownlow House Dickens Estate George Row
Flat Ground Floor 28 Bermondsey Wall West London
5 East Lane London Southwark
Flat 14 Luna House 37 Bermondsey Wall West
Flat 10 Luna House 37 Bermondsey Wall West
Flat 12 Meridian Court 3 East Lane
19 Tempus Wharf 33 Bermondsey Wall

West London
16 Tempus Wharf 33 Bermondsey Wall West London
Flat 26 Axis Court 2 East Lane
Flat 22 Axis Court 2 East Lane
Flat 9 Axis Court 2 East Lane
Flat 5 Axis Court 2 East Lane
St Michaels Catholic College Llewellyn Street London
24 Emba Street London Southwark
22 Emba Street London Southwark
20 Emba Street London Southwark
16 Emba Street London Southwark
18 Emba Street London Southwark
12 Emba Street London Southwark
14 Emba Street London Southwark
10 Emba Street London Southwark
8 Emba Street London Southwark
6 Emba Street London Southwark
4 Emba Street London Southwark
2 Emba Street London Southwark
32 Emba Street London Southwark
42 Wilson Grove London Southwark
3 Emba Street London Southwark
2 Butterfield Close London Southwark
48 Wilson Grove London Southwark
7 Emba Street London Southwark
6 Janeway Street London Southwark
44 Emba Street London Southwark
47 Wilson Grove London Southwark
44 Wilson Grove London Southwark
1 Emba Street London Southwark
4 Butterfield Close London Southwark
1 Butterfield Close London Southwark
5 Butterfield Close London Southwark
3 Butterfield Close London Southwark
8 Janeway Street London Southwark
4 Janeway Street London Southwark
2 Janeway Street London Southwark
12 Janeway Street London Southwark
10 Janeway Street London Southwark
49 Wilson Grove London Southwark
5 Emba Street London Southwark
46 Wilson Grove London Southwark
45 Wilson Grove London Southwark
43 Wilson Grove London Southwark
42 Emba Street London Southwark
40 Emba Street London Southwark
38 Emba Street London Southwark
36 Emba Street London Southwark
34 Emba Street London Southwark
20 Janeway Street London Southwark
16 Janeway Street London Southwark
24 Janeway Street London Southwark
22 Janeway Street London Southwark
18 Janeway Street London Southwark
14 Janeway Street London Southwark
198 Bermondsey Wall East London Southwark
196 Bermondsey Wall East London Southwark
194 Bermondsey Wall East London Southwark
188 Bermondsey Wall East London Southwark
192 Bermondsey Wall East London Southwark
190 Bermondsey Wall East London Southwark
Flat 22 Fleming House Dickens Estate George Row
12 Springview Heights 26 Bermondsey Wall West London
9 Springview Heights 26 Bermondsey Wall West London
8 Springview Heights 26 Bermondsey Wall West London
6 Springview Heights 26 Bermondsey Wall West London
1 Springview Heights 26 Bermondsey Wall West London
Tempus Wharf 33A Bermondsey Wall West London
Flat 19 Oliver House Dickens Estate George Row
Flat 15 Brownlow House Dickens Estate George Row
26 Janeway Street London Southwark
34 Hartley House Chambers Street London
Flat 44 Axis Court 15 Chambers Street
73 Jacob House Chambers Street London
Ground Floor Front Tempus Wharf 29 Bermondsey Wall West
Flat 57 Wrayburn House Dickens Estate Llewellyn Street
Flat 20 Meridian Court 3 East Lane
83 Hartley House Chambers Street London
64 Hartley House Chambers Street London
25 Hartley House Chambers Street London

Flat 5 Meridian Court 3 East Lane
Flat 26 Luna House 37 Bermondsey Wall West
40 Hartley House Chambers Street London
Flat 3 Haredale House Dickens Estate East Lane
Flat 2 Haredale House Dickens Estate East Lane
Maisonette First And Second Floors 28 Bermondsey Wall West London
Flat 17 Oliver House Dickens Estate George Row
Flat 10 Fountain House Bermondsey Wall East
Flat 1 94A Bermondsey Wall East London
Flat 1 Havisham House Dickens Estate Scott Lidgett Crescent
4 Fountain Green Square London Southwark
Flat 14 Brownlow House Dickens Estate George Row
3B River View Heights 27 Bermondsey Wall West London
2I River View Heights 27 Bermondsey Wall West London
1A River View Heights 27 Bermondsey Wall West London
212 Bermondsey Wall East London Southwark
206 Bermondsey Wall East London Southwark
Flat 58 Wrayburn House Dickens Estate Llewellyn Street
71 Jacob House Chambers Street London
3 Fountain Green Square London Southwark
Flat 2 Havisham House Dickens Estate Scott Lidgett Crescent
Ground Floor Rear Tempus Wharf 29 Bermondsey Wall West
54 Jacob House Chambers Street London
53 Jacob House Chambers Street London
48 Jacob House Chambers Street London
43 Jacob House Chambers Street London
28 Jacob House Chambers Street London
23 Jacob House Chambers Street London
87 Hartley House Chambers Street London
Flat 17 Fleming House Dickens Estate George Row
Flat 5 Fleming House Dickens Estate George Row
Flat 20 Fleming House Dickens Estate George Row
Flat 12 Fleming House Dickens Estate George Row
Flat 21 Fleming House Dickens Estate George Row
Flat 2 Fleming House Dickens Estate George Row
Flat 15 Fleming House Dickens Estate George Row
Flat 13 Fleming House Dickens Estate George Row
Flat 10 Fleming House Dickens Estate George Row
Flat 8 Fleming House Dickens Estate George Row
Flat 3 Fleming House Dickens Estate George Row
Flat 23 Fleming House Dickens Estate George Row
Flat 11 Fleming House Dickens Estate George Row
Flat 1 Fleming House Dickens Estate George Row
Flat 9 Fleming House Dickens Estate George Row
Flat 6 Fleming House Dickens Estate George Row
Flat 7 Fleming House Dickens Estate George Row
Flat 4 Fleming House Dickens Estate George Row
Flat 25 Fleming House Dickens Estate George Row
Flat 24 Fleming House Dickens Estate George Row
Flat 19 Fleming House Dickens Estate George Row
Flat 18 Fleming House Dickens Estate George Row
Flat 16 Fleming House Dickens Estate George Row
Flat 14 Fleming House Dickens Estate

George Row
G2 River View Heights 27 Bermondsey Wall West
Studio Flat River View Heights 27 Bermondsey Wall West
G1 River View Heights 27 Bermondsey Wall West
1K River View Heights 27 Bermondsey Wall West London
1J River View Heights 27 Bermondsey Wall West London
18 Chambers Street London SE164XL
78 Hartley House Chambers Street London
Flat 8 Oliver House Dickens Estate George Row
Flat 39 Wrayburn House Dickens Estate Llewellyn Street
Flat 29 Wrayburn House Dickens Estate Llewellyn Street
Flat 47 Wrayburn House Dickens Estate Llewellyn Street
5D River View Heights 27 Bermondsey Wall West London
Flat 27 Oliver House Dickens Estate George Row
Flat 25 Oliver House Dickens Estate George Row
Flat 13 Oliver House Dickens Estate George Row
Flat 1 Oliver House Dickens Estate George Row
11 Dartle Court London Southwark
Flat 44 Luna House 37 Bermondsey Wall West
18 Jacob House Chambers Street London
16 Jacob House Chambers Street London
5 Jacob House Chambers Street London
74 Hartley House Chambers Street London
63 Hartley House Chambers Street London
37 Hartley House Chambers Street London
35 Hartley House Chambers Street London
7 Tempus Wharf 29 Bermondsey Wall West London
Flat 18 Luna House 37 Bermondsey Wall West
Flat 11 Luna House 37 Bermondsey Wall West
Flat 26 Meridian Court 7 East Lane
Flat 8 Meridian Court 3 East Lane
Flat 2 Meridian Court 3 East Lane
Flat 48 Axis Court 15 Chambers Street
Apartment 8 22 Chambers Street London
96 Bermondsey Wall East London Southwark
Flat 71 Wrayburn House Dickens Estate Llewellyn Street
50 Farncombe Street London Southwark
8 Bevington Street London Southwark
2 Bevington Street London Southwark
46 Farncombe Street London Southwark
Flat 9 Wrayburn House Dickens Estate Llewellyn Street
Flat 19 Wrayburn House Dickens Estate Llewellyn Street
Flat 10 Wrayburn House Dickens Estate Llewellyn Street
Flat 7 Haredale House Dickens Estate East Lane
7 Waterside Close London Southwark
6 Waterside Close London Southwark
5J River View Heights 27 Bermondsey Wall West London
3F River View Heights 27 Bermondsey Wall West London
Flat 2 Fountain House Bermondsey Wall East
1G River View Heights 27 Bermondsey Wall West London
1C River View Heights 27 Bermondsey Wall West London
Flat 3 Oliver House Dickens Estate George Row
72 Hartley House Chambers Street London
27 Hartley House Chambers Street London
20 Hartley House Chambers Street London
16 Hartley House Chambers Street London
11 Hartley House Chambers Street London
Flat 34 Luna House 37 Bermondsey Wall West
Flat 28 Meridian Court 7 East Lane
Flat 17 Meridian Court 3 East Lane

Flat 4 Meridian Court 3 East Lane
Flat 58 Axis Court 15 Chambers Street
Flat 53 Axis Court 15 Chambers Street
Flat 50 Axis Court 15 Chambers Street
Flat 49 Axis Court 15 Chambers Street
Flat 40 Axis Court 15 Chambers Street
Apartment 1 22 Chambers Street London
24 Tempus Wharf 33 Bermondsey Wall West London
Flat 28 Axis Court 2 East Lane
Flat 21 Axis Court 2 East Lane
Flat 18 Axis Court 2 East Lane
Flat 1 Axis Court 2 East Lane
Living Accommodation Prince Of Wales Scott Lidgett Crescent
Prince Of Wales Public House Scott Lidgett Crescent London
Flat 16 Micawber House Dickens Estate Llewellyn Street
Flat 19 Micawber House Dickens Estate Llewellyn Street
Flat 9 Micawber House Dickens Estate Llewellyn Street
Flat 6 Micawber House Dickens Estate Llewellyn Street
Flat 4 Micawber House Dickens Estate Llewellyn Street
Flat 20 Micawber House Dickens Estate Llewellyn Street
Flat 17 Micawber House Dickens Estate Llewellyn Street
Flat 15 Micawber House Dickens Estate Llewellyn Street
Flat 13 Micawber House Dickens Estate Llewellyn Street
Flat 11 Micawber House Dickens Estate Llewellyn Street
Flat 8 Micawber House Dickens Estate Llewellyn Street
Flat 7 Micawber House Dickens Estate Llewellyn Street
Flat 5 Micawber House Dickens Estate Llewellyn Street
Flat 3 Micawber House Dickens Estate Llewellyn Street
Flat 2 Micawber House Dickens Estate Llewellyn Street
Flat 18 Micawber House Dickens Estate Llewellyn Street
Flat 14 Micawber House Dickens Estate Llewellyn Street
Flat 12 Micawber House Dickens Estate Llewellyn Street
Flat 10 Micawber House Dickens Estate Llewellyn Street
Flat 1 Micawber House Dickens Estate Llewellyn Street
Flat 11 Burnaby Court 1 Scott Lidgett Crescent
12 Waterside Close London Southwark
Flat 7 Burnaby Court 1 Scott Lidgett Crescent
Flat 12 Burnaby Court 1 Scott Lidgett Crescent
Flat 10 Burnaby Court 1 Scott Lidgett Crescent
Flat 8 Burnaby Court 1 Scott Lidgett Crescent
Flat 5 Burnaby Court 1 Scott Lidgett Crescent
Flat 70 Wrayburn House Dickens Estate Llewellyn Street
4 Waterside Close London Southwark
Flat 6 Havisham House Dickens Estate Scott Lidgett Crescent
56 Farncombe Street London Southwark
Flat 65 Wrayburn House Dickens Estate Llewellyn Street
5I River View Heights 27 Bermondsey Wall West London
Flat 11 Oliver House Dickens Estate George Row
Flat 22 Luna House 37 Bermondsey Wall West
63 Jacob House Chambers Street London
44 Jacob House Chambers Street London
35 Jacob House Chambers Street London
15 Hartley House Chambers Street London
10 Jacob House Chambers Street London
2 Jacob House Chambers Street London
52 Hartley House Chambers Street London
Flat 43 Luna House 37 Bermondsey Wall West
Flat 3 Luna House 37 Bermondsey Wall West
Flat 46 Axis Court 15 Chambers Street
School House Bevington Street London

Flat 64 Wrayburn House Dickens Estate Llewellyn Street
13 Bevington Street London Southwark
7 Bevington Street London Southwark
Flat 8 Brownlow House Dickens Estate George Row
Flat 13 Brownlow House Dickens Estate George Row
Flat 12 Brownlow House Dickens Estate George Row
Flat 7 Wrayburn House Dickens Estate Llewellyn Street
Flat 48 Wrayburn House Dickens Estate Llewellyn Street
Flat 46 Wrayburn House Dickens Estate Llewellyn Street
Flat 42 Wrayburn House Dickens Estate Llewellyn Street
3 Waterside Close London Southwark
6H River View Heights 27 Bermondsey Wall West London
3J River View Heights 27 Bermondsey Wall West London
1E River View Heights 27 Bermondsey Wall West London
Flat 3 Fountain House Bermondsey Wall East
Flat 11 Havisham House Dickens Estate Scott Lidgett Crescent
Flat 20 Brownlow House Dickens Estate George Row
Flat 16 Brownlow House Dickens Estate George Row
Flat 11 Brownlow House Dickens Estate George Row
2A River View Heights 27 Bermondsey Wall West London
Flat 68 Wrayburn House Dickens Estate Llewellyn Street
Flat 54 Wrayburn House Dickens Estate Llewellyn Street
Flat 45 Wrayburn House Dickens Estate Llewellyn Street
Flat 22 Wrayburn House Dickens Estate Llewellyn Street
Flat 16 Wrayburn House Dickens Estate Llewellyn Street
Flat 5 Wrayburn House Dickens Estate Llewellyn Street
6D River View Heights 27 Bermondsey Wall West London
4D River View Heights 27 Bermondsey Wall West London
Flat 20 Oliver House Dickens Estate George Row
24 Hartley House Chambers Street London
7 Hartley House Chambers Street London
1 Hartley House Chambers Street London
13 Jacob House Chambers Street London
57 Hartley House Chambers Street London
69 Jacob House Chambers Street London
4 Tempus Wharf 29 Bermondsey Wall West London
10 Tempus Wharf 33 Bermondsey Wall West London
Flat 11A Havisham House Dickens Estate Scott Lidgett Crescent
Flat 29 Meridian Court 7 East Lane
42 Bermondsey Wall West London Southwark
Flat 4 32 Bermondsey Wall West London
Flat 1 32 Bermondsey Wall West London
8 Tempus Wharf 29 Bermondsey Wall West London
Apartment 5 22 Chambers Street London
Flat 35 Axis Court 15 Chambers Street
Flat 21 Oliver House Dickens Estate George Row
Flat 12 Oliver House Dickens Estate George Row
Flat 5 94A Bermondsey Wall East London
40 Farncombe Street London Southwark
78 Jacob House Chambers Street London
70 Jacob House Chambers Street London
67 Jacob House Chambers Street London
31 Jacob House Chambers Street London
26 Jacob House Chambers Street London
15 Jacob House Chambers Street London
91 Hartley House Chambers Street London

86 Hartley House Chambers Street London
69 Hartley House Chambers Street London
61 Hartley House Chambers Street London
56 Hartley House Chambers Street London
55 Hartley House Chambers Street London
53 Hartley House Chambers Street London
28 Hartley House Chambers Street London
19 Hartley House Chambers Street London
3 Hartley House Chambers Street London
Flat 47 Luna House 37 Bermondsey Wall West
Flat 40 Luna House 37 Bermondsey Wall West
Flat 25 Luna House 37 Bermondsey Wall West
Flat 5 Luna House 37 Bermondsey Wall West
Flat 32 Meridian Court 7 East Lane
Flat 7 Meridian Court 3 East Lane
Flat 6 Meridian Court 3 East Lane
Flat 3 Meridian Court 3 East Lane
9 Tempus Wharf 29 Bermondsey Wall West London
Apartment 7 22 Chambers Street London
Apartment 3 22 Chambers Street London
5 Tempus Wharf 29 Bermondsey Wall West London
Flat 29 Axis Court 2 East Lane
Flat 23 Axis Court 2 East Lane
Flat 17 Axis Court 2 East Lane
Flat 16 Axis Court 2 East Lane
Flat 12 Axis Court 2 East Lane
Flat 6 Axis Court 2 East Lane
Flat 3 Axis Court 2 East Lane
19 Springview Heights 26 Bermondsey Wall West London
92 Hartley House Chambers Street London
75 Hartley House Chambers Street London
2B River View Heights 27 Bermondsey Wall West London
Flat 9 Havisham House Dickens Estate Scott Lidgett Crescent
19 Jacob House Chambers Street London
Flat 41 Wrayburn House Dickens Estate Llewellyn Street
Flat 20 Wrayburn House Dickens Estate Llewellyn Street
3A River View Heights 27 Bermondsey Wall West London
Flat 38 Axis Court 15 Chambers Street
Flat 1 Brownlow House Dickens Estate George Row
45 Hartley House Chambers Street London
Flat 28 Luna House 37 Bermondsey Wall West
7C River View Heights 27 Bermondsey Wall West London
Flat 15 Havisham House Dickens Estate Scott Lidgett Crescent
9 Waterside Close London Southwark
Flat 23 Wrayburn House Dickens Estate Llewellyn Street
2F River View Heights 27 Bermondsey Wall West London
28 Bermondsey Wall West London Southwark
Flat 8 Havisham House Dickens Estate Scott Lidgett Crescent
1 Fountain Green Square London Southwark
Flat 8 Haredale House Dickens Estate East Lane
Flat 13 Haredale House Dickens Estate East Lane
Flat 72 Wrayburn House Dickens Estate Llewellyn Street
Flat 6 Oliver House Dickens Estate George Row
Flat 43 Wrayburn House Dickens Estate Llewellyn Street
Flat 14 Wrayburn House Dickens Estate Llewellyn Street
Flat 11 Wrayburn House Dickens Estate Llewellyn Street
Flat 52 Wrayburn House Dickens Estate Llewellyn Street
6A River View Heights 27 Bermondsey Wall West London
204 Bermondsey Wall East London

Southwark
Flat 55 Wrayburn House Dickens Estate Llewellyn Street
6 Butterfield Close London Southwark
Flat 4 Wrayburn House Dickens Estate Llewellyn Street
Flat 33 Wrayburn House Dickens Estate Llewellyn Street
Flat 27 Wrayburn House Dickens Estate Llewellyn Street
Flat 21 Wrayburn House Dickens Estate Llewellyn Street
5E River View Heights 27 Bermondsey Wall West London

Appendix 5: Consultation responses received

Internal services

LBS Archaeology
LBS Transport Policy
LBS Planning Policy
LBS Highways Development & Management
LBS Community Infrastructure Levy Team
LBS Design & Conservation Team [Formal]
LBS Ecology
LBS Environmental Protection
LBS Section 106 Team
LBS Flood Risk Management & Urban Drain
LBS Urban Forester
LBS Ecology
LBS Archaeology
LBS Community Infrastructure Levy Team
LBS Ecology
LBS Environmental Protection
LBS Planning Policy
LBS Transport Policy
LBS Urban Forester

Statutory and non-statutory organisations

Environment Agency
Thames Tideway Tunnel
London Fire & Emergency Planning Authority
Thames Water
Historic England
Greater London Authority
London City Airport
HSE Fire Risk Assessments
Port Of London Authority
Transport For London

Neighbour and local groups consulted:

Flat 1A River View Heights 27 Bermondsey Wall West London
Flat 56 Axis Court 15 Chambers Street London
Flat 9 Axis Court 2 East Lane London
6 Mitchell Gardens Slinfold
29 axis court London SE16 4UQ
23 Millpond Estate West Lane London
4 Cocoa Mill Apartments 1 Sugar Lane London
27 Bermondsey Wall West Flat 6H London
42 Hartley House Chambers Street London
23 Millpond Estate West Lane London
7 Alderwick Drive Hounslow
Flat 11 Luna House 37 Bermondsey Wall West London
21 Tempus Wharf 33 Bermondsey Wall West London
43 Axis Court 15 Chambers Street Bermondsey London
38 Axis Court 15 Chambers Street Bermondsey London

32 Luna House 37 Bermondsey wall west London
Flat 24, Luna House 37 Bermondsey Wall West London
46 Farncombe Street London Southwark
13 Luna House 37 Bermondsey Wall West London
8 Tempus Wharf 29 Bermondsey Wall West London
Flat 17 Axis Court 2 East Lane
8 Tempus Wharf 29 Bermondsey Wall West London
Flat 3 Tempus Wharf 29 Bermondsey Wall West London
6 Mitchell Gardens Slinfold Horsham
6 Tempus Wharf 29 Bermondsey Wall West London SE164RW
Flat 9, Tempus Wharf, 29 Bermondsey Wall West, 29 Bermondsey Wall West London SE16 4RW
Flat 3 Luna House bermondsey Wall West London

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COMMITTEE: **PLANNING COMMITTEE (MAJOR APPLICATIONS) B**

NOTE: Original held in Constitutional Team; all amendments/queries to Gregory Weaver, Constitutional Team, Tel: 020 7525 3667

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