Open Agenda

Planning Committee (Major Applications) B

Wednesday 10 September 2025
6.30 pm
Ground Floor Meeting Room G02 - 160 Tooley Street, London SE1 2QH

Membership

Councillor Richard Livingstone (Chair)
Councillor Kath Whittam (Vice-Chair)
Councillor Sam Dalton
Councillor Ketzia Harper
Councillor Cleo Soanes
Councillor Emily Tester
Councillor Joseph Vambe

Reserves

Councillor Gavin Edwards
Councillor Esme Hicks
Councillor Nick Johnson
Councillor Jason Ochere
Councillor Reginald Popoola
Councillor Catherine Rose
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

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

Access

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

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Members of the committee are summoned to attend this meeting
Althea Loderick
Chief Executive
Date: 2 September 2025

PRINTED ON RECYCLED PAPER

Planning Committee (Major Applications) B

Wednesday 10 September 2025
6.30 pm
Ground Floor Meeting Room G02 - 160 Tooley Street, London SE1 2QH

Order of Business

Item No.	Title	Page No.
1.	**APOLOGIES** To receive any apologies for absence.	
2.	**CONFIRMATION OF VOTING MEMBERS** A representative of each political group will confirm the voting members of the committee.	
3.	**NOTIFICATION OF ANY ITEMS OF BUSINESS WHICH THE CHAIR DEEMS URGENT** In special circumstances, an item of business may be added to an agenda within five clear days of the meeting.	
4.	**DISCLOSURE OF INTERESTS AND DISPENSATIONS** Members to declare any personal interests and dispensation in respect of any item of business to be considered at this meeting.	
5.	**MINUTES** To approve as a correct record the minutes of the meeting held on 15 July 2025.	1 - 6
6.	**ADOPTION OF THE CLIMATE AND ENVIRONMENT SUPPLEMENTARY PLANNING DOCUMENT (SPD)**	7 - 8

Item No.	Title	Page No.
7.	**TO RELEASE £101,782.80 FROM SECTION 106 AGREEMENTS FOR THE DELIVERY OF A PLAYGROUND ON THE BELLS GARDEN ESTATE**	9 - 16
8.	**TO RELEASE £139,927.45 FROM SECTION 106 AGREEMENTS FOR THE DELIVERY OF GREAT SUFFOLK STREET AREA SCHEME - PHASE 2**	17 - 34
9.	**TO RELEASE OF £428,834.94 OF S106 FUNDS TO SUPPORT THE DELIVERY OF THE LOST PECK FLOOD ALLEVIATION AND ENVIRONMENTAL ENHANCEMENT SCHEME**	35 - 55
10.	**TO RELEASE £5,078,652.01 FROM SECTION 106 AGREEMENTS TO TFL TO DELIVER IMPROVEMENTS TO BUS SERVICES ON OLD KENT ROAD AND ELEPHANT AND CASTLE (BAKERLOOP BUS)**	56 - 65
11.	**DEVELOPMENT MANAGEMENT**	66 - 70
11.1.	**301-303 ILDERTON ROAD LONDON SOUTHWARK SE15 1NW**	71 - 262
11.2.	**SKIPTON HOUSE, 80 LONDON ROAD, LONDON, SOUTHWARK SE1 6LH**	263 - 486

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

EXCLUSION OF PRESS AND PUBLIC

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

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

Date: 2 September 2025

Planning Committee (Major Applications)

Guidance on conduct of business for planning applications, enforcement cases and other planning proposals

1. The reports are taken in the order of business on the agenda.

2. The officers present the report and recommendations and answer points raised by members of the committee.

3. The role of members of the planning committee (major applications) is to make planning decisions openly, impartially, with sound judgement and for justifiable reasons in accordance with the statutory planning framework.

4. The following may address the committee (if they are present and wish to speak) for **not more than 3 minutes each**.

   (a) One representative (spokesperson) for any objectors. If there is more than one objector wishing to speak, the time is then divided within the 3-minute time slot.

   (b) The applicant or applicant's agent.

   (c) One representative for any supporters (who live within 100 metres of the development site).

   (d) Ward councillor (spokesperson) from where the proposal is located.

   (e) The members of the committee will then debate the application and consider the recommendation.

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

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

will ask which objector(s) would like to speak at the point the actual item is being considered.

6. Speakers should lead the committee to subjects on which they would welcome further questioning.

7. Those people nominated to speak on behalf of objectors, supporters or applicants, as well as ward members, should sit on the front row of the public seating area. This is for ease of communication between the committee and the speaker, in case any issues need to be clarified later in the proceedings; it is **not** an opportunity to take part in the debate of the committee.

8. Each speaker should restrict their comments to the planning aspects of the proposal and should avoid repeating what is already in the report. The meeting is not a hearing where all participants present evidence to be examined by other participants. **As meetings are usually livestreamed, speakers should not disclose any information they do not wish to be in the public domain.**

9. This is a council committee meeting which is open to the public and there should be no interruptions from the audience.

10. No smoking is allowed at committee.

11. Members of the public are welcome to film, audio record, photograph, or tweet the public proceedings of the meeting; please be considerate towards other people in the room and take care not to disturb the proceedings.

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

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

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

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

Agenda Item 5

Planning Committee (Major Applications) B

MINUTES of the OPEN section of the Planning Committee (Major Applications) B held on Tuesday 15 July 2025 at 6.30 pm at Ground Floor Meeting Room G02A - 160 Tooley Street, London SE1 2QH

PRESENT:	Councillor Richard Livingstone (Chair) Councillor Sam Dalton Councillor Ketzia Harper Councillor Cleo Soanes Councillor Emily Tester Councillor Joseph Vambe
OTHER MEMBERS PRESENT:	Councillor Jasmine Ali Councillor David Parton
OFFICER SUPPORT:	Colin Wilson, (Assistant Director Strategic Development) Nagla Stevens, (External Legal Counsel, Birketts) Dipesh Patel, (Head of Planning, Strategic Applications) Victoria Lewis, (Team Leader) Matt Redman, (Senior Planning Officer) Michael Tsoukaris, (Group Manager Design & Conservation)

1. APOLOGIES

Apologies for absence were received from Councillor Kath Whittam.

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

4. DISCLOSURE OF INTERESTS AND DISPENSATIONS

The following member declared an interest in item:

7.2 & 7.3 – 24/AP/3800 & 24/AP/3801 – Chambers Wharf, Chambers Street, London, SE16 4XQ

Councillor Emily Tester, non-prejudicial as while the site in question was in her ward, she 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 and signed by the chair.

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

Report: See pages 7-59 of the main agenda report.

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

RESOLVED:

That 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 the 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).

7. DEVELOPMENT MANAGEMENT

RESOLVED:

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

7.1 24/AP/2074 - THE AYLESHAM CENTRE, RYE LANE, LONDON, SE15 5EW

Planning Application Number: 24/AP/2074

Report: See pages 65-305 of the main agenda, pages 1-519 of the Supplemental Agenda and addendum report pages 1 – 9.

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."

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

Members put questions to the officers.

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

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

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

Councillor Jasmine Ali and David Parton addressed the committee in their capacity as ward councillors and responded to questions put by members of the committee.

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

the committee went into closed session for a brief period between 23:26pm - 23:52pm.

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

RESOLVED:

That the Planning Committee:

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 27 October 2025.

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

The proposed development, owing to the low level of affordable housing and the failure to deliver any 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; the scheme would also result in harm to the townscape owing to the excessive height of proposed block L. 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' D4 'Delivering good design' 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).

The proposed development, owing to the low level of affordable housing, would fail to meet the significant need for social rented and intermediate homes in the borough. As such the proposal would be contrary to policy P1 'Social rented and intermediate housing' of the Southwark Plan (2022) and the Affordable Housing SPD (2025) and policy GG4 of the London Plan.

The proposed development, owing to the loss of retail floorspace would fail

to meet the site allocation requirement in NSP74 to provide at least the existing amount of retail floorspace currently on the site and such would cause harm to the vitality and viability of the town centre and would fail to diversify and complement the existing retail offer in the town centre. This would be contrary to policy SD6 'Town centres and high streets' and E9 'Retail, markets and hot food takeaways' of the London Plan 2021 and policy P35 'Town and Local Centres' NSP74 of the Southwark Plan (2022).

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.

7. If the appeal is granted and condition for section 106 obligations imposed that requires the applicant resubmit a final business relocation strategy to the council for approval, that this approval is determined by planning committee.

7.2 24/AP/3800 - CHAMBERS WHARF, CHAMBERS STREET, LONDON, SE16 4XQ

This item was withdrawn by planning officers to be heard on the 22 July 2025 at 9pm.

7.3 24/AP/3801 - CHAMBERS WHARF, CHAMBERS STREET, LONDON, SE16 4XQ

This item was withdrawn by planning officers to be heard on the 22 July 2025 at 9pm.

The meeting ended at 00.10 am.

CHAIR:

DATED:

Agenda Item 6

Meeting Name:	Planning Committee (Major Applications) B
Date:	10 September 2025
Report title:	Adoption of the Climate and Environment Supplementary Planning Document (SPD) (outline report - full report to follow)
Ward(s) or groups affected:	All
Classification:	Open
Reason for lateness (if applicable):	N/A
From:	Head of Planning Policy

RECOMMENDATION

1. That the Planning Committee (Major Applications) B provide comments in relation to the draft SPD before approval at cabinet.

BACKGROUND INFORMATION

2. The Climate and Environment Supplementary Planning Document (SPD) is scheduled for approval at October cabinet following public consultation which closed in November 2024.

3. Part 3C (paragraph 21) of the council's Constitution sets out the requirement for full cabinet to adopt the Climate and Environment SPD, taking account of comments from the planning committee.

4. The Southwark Plan 2022 was adopted in February 2022. To support the implementation of the Southwark Plan, the SPD has been prepared to provide applicants and case officers with additional information on how to implement the climate and environment policies. It also provides guidance on how to conform to national and local legislature.

5. The SPD will be used by developers and those interested in the measures which can be taken to make development and the environment cleaner and more biodiverse, energy efficient and resilient to the effects of climate change. It will be a material consideration in the determination of a planning application.

KEY ISSUES FOR CONSIDERATION

To follow.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Plan (2022)	Council website Environment, Neighbourhoods and Growth Department Southwark Council 160 Tooley Street London SE1 2QH	Email Planning Policy Planning.policy@southwark.gov.uk Tel: 020 7525 5380
Link: https://www.southwark.gov.uk/planning-environment-and-building-control/planning/planning-policy-and-guidance/southwark-plan-2022		

APPENDICES

No.	Title
Appendix 1	Climate and Environment SPD Electronic only: please see Agenda for Planning Committee (Major Applications) B on Wednesday 10 September 2025, 6.30 pm - Southwark Council – see agenda item 6
Appendix 2	Policy note on flood risk management Electronic only: please see Agenda for Planning Committee (Major Applications) B on Wednesday 10 September 2025, 6.30 pm - Southwark Council – see agenda item 6

AUDIT TRAIL

Lead Officer	Juliet Seymour, Assistant Director of Building Control and Historical Environment	
Report Author	Charlotte Brooks-Lawrie, Head of Planning Policy	
Version	Final	
Dated	28 August 2025	
Key Decision?	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBERS		
Officer Title	**Comments Sought**	**Comments Included**
Assistant Chief Executive – Governance and Assurance	To follow	To follow
Strategic Director of Resources	To follow	To follow
Date final report sent to Constitutional Team		1 September 2025

Agenda Item 7

Meeting Name:	Planning Committee (Major Applications) B
Date:	10 September 2025
Report title:	To release £101,782.80 from Section 106 agreements for the delivery of a playground on the Bells Garden Estate
Ward(s) or groups affected:	Peckham
Classification:	Open
Reason for lateness (if applicable):	Not Applicable
From:	Managing Director Southwark Construction

RECOMMENDATION

1. That the planning committee approves the release of £101,782.80 of Section 106 funding secured in connection with Bells Garden Estate (set out in more detail below) towards the development of the children's playground.

Reference	Account No	Type	Address	Amount
14/AP/1085	803	Play, Children's Play Equipment and Sports Development	170 Sumner Road SE15 6PQ	£2,043.72
16/AP/4702	867	Play, Children's Play Equipment and Sports Development	Vacant site opposite Central Venture Park Commercial Way SE15 (On The Site Of Former 25 Commercial Way) SE15	99,739.08
				£101,782.80

BACKGROUND INFORMATION

2. Planning obligations under S106 of the Town and Country Planning Act 1990 are used to address the negative impacts caused by development and contribute to providing infrastructure and facilities necessary to achieve sustainable communities. These obligations can take the form of financial contributions and non-financial contributions and can cover a range of purposes.

3. Section 106 planning obligations are used to address site-specific impacts of developments or where a developer fails to meet planning policy

requirements for providing certain infrastructure.

4. The council's S106 and CIL Supplementary Planning Document (SPD) 2015 (updated November 2020) set out detailed guidance on the use of S106 planning obligations as well as CIL.

5. Bells Garden received planning consent on 29 January 2022 to deliver 83 homes, a brand-new community centre, a Multi-Use Games Area (MUGA), children's playground, play spaces, and landscaping.

6. A Gateway (GW) 2 dated 14 August 2023, approved the main works contract to deliver 83 new social rented units, a community centre, landscaping and a children's playground on the Bells Garden Estate and 44 new homes on the Neighbouring Lindley Estate at a total cost of £80,976,824.

7. Due to budget constraints, the council did not enter into the main works contract, which was due to commence in September 2023. The direct delivery of the main works to deliver 83 homes on the Bells Garden estate has been paused.

8. The works under the minor works contract demolished the community centre, children's playground, and MUGA. The children's playground was intended to form part of the main works contract. The playground was not developed. Releasing the section 106 funds will help support the development of the playground.

9. The southernmost landscape and children's playground design have received planning consent under planning permission ref. No. 21/AP/1077.

10. The funding requested will contribute towards the development of the playground.

KEY ISSUES FOR CONSIDERATION

11. The council has committed to delivering 11,000 new homes by 2043. The playground development will build on the progress made to date and facilitate the advancement of the development programme in accordance with both the council's commitments and budget.

12. Part of this commitment is to ensure the sustainability and improvement of existing estates.

13. The Bells Garden estate currently has no playground (with equipment) due to the demolition of the children's playground, MUGA, and community centre. The site is hoarded with large piles of rubble following the demolition.

14. Commitments have been made to residents to re-provide amenities as part of the estate's redevelopment. Residents have raised concerns and frustrations that the playground was not immediately re-provided following demolition as part of the minor works contract. Whilst a new play space has

been provided on the estate, the loss of the playground with equipment has had an impact on the local residents.

15. The demolition of amenities and loss of playgrounds have recently received national media attention.

16. Given this position, it is considered essential to provide the children's playground and the associated landscaping works to address the community's needs; this aligns with the council's commitments to deliver greener, cleaner, and safer outdoor spaces in already established communities.

Policy framework implications

17. The development of the playground aligns with Fairer Future Commitment Theme 5 - A healthier life, through the improvement of green spaces and play facilities to encourage park use and an active lifestyle. In Southwark, the estimated cost of physical inactivity exceeds £17 million each year.

18. The council's Open Spaces Strategy highlights that the assessment of population density and deprivation indicates that the central and northern areas of the borough, including Peckham, have the greatest need for high-quality open space to help tackle socio-economic issues.

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

    a. 'Policy S4: Play and informal recreation', by improving the play area, and increasing opportunities for children with disabilities to play alongside their friends. This will enable children and young people to be independently mobile.

    b. 'Policy G4: Open Space', and 'G5 Urban Greening', by enhancing green space, increasing the size of the tree canopy and adding more planting.

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

Community impact statement

20. The council's consultation with residents regarding the 11,000 council homes programme has been specifically designed to be inclusive of all the borough's communities, providing a variety of mechanisms to offer residents the opportunity to engage.

21. The Cabinet has agreed a new vision for the future housing strategy, including the principle of using every tool at its disposal to increase the supply of all kinds of homes across Southwark.

22. This includes building new homes that make up healthy, sustainable neighbourhoods, supported by a range of quality community facilities (schools, parks, shops), making them attractive and safe places to live for

people of all ages.

23. The development of the children's playground and associated landscape aligns with the strategy of developing sustainable communities.

Equalities (including socio-economic) impact statement

24. The Public Sector Equality Duty pursuant to section 149 of the Equality Act 2010, requires public bodies to consider those with protected characteristics (which includes age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation) when carrying out their day-to-day work in shaping policy and delivering services. It applies to every aspect of local government decision-making and requires decision makers 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.

25. The protected characteristics most relevant to this decision are race and age.

26. The playground will be situated in the Bells Garden estate within the Peckham ward. On the Bells Gardens Estate, 59% of heads of households are Black, 25% are White, and 9% are Asian. There are smaller populations of Latin American, Arab, Other, and Mixed ethnicities. The largest groups of Black households are Nigerian and Caribbean, while the largest population of White households consists of White British and Turkish Cypriot individuals. The Asian population is divided among Vietnamese, Bangladeshi, and Chinese residents.

27. The new playground will provide a safe, engaging space for children on the estate to play, be active, and develop social and physical skills. It will encourage outdoor activity, support their wellbeing, and foster a stronger sense of community among families.

28. The Equalities assessment is considered in light of the decision of the report and considers the reprovision of a playground on the Bells Garden Estate.

Health impact statement

29. Bells Garden is an estate located in Peckham Ward. It is comprised by high and mid-rise buildings. It has a large area of green space which is under-utilised. The outdoor amenity space was reduced as a result of the first stage works under the minor works contract to demolish the Bells Garden Community Centre and the MUGA.

30. The provision of the children's playground and reinstating landscaping work will provide a positive impact on health inequalities, as the playground will be designed to current quality and inclusive standards that will contribute towards addressing health inequalities.

Climate change implications

31. Where possible, all new landscaping and play equipment will be sourced locally, and robust, recycled, and sustainable products will be used.

32. Southwark Construction will work with the appointed contractor to demonstrate how they have embedded climate change mitigation measures into their working practices and company philosophy and how they will reduce on-site carbon emissions as part of this contract.

Resource implications

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

34. The project is being managed by the Southwark Construction team, which has extensive experience in delivering similar programmes in Southwark. Staffing and other costs connected with this recommendation must be contained within departmental revenue budgets.

Financial implications

35. The project will form part of the council's Housing Investment Programme, and Southwark Construction will manage its delivery. The costs associated with the project will be funded from resources supporting the Housing Investment Programme, including borrowing and capital receipts from the disposal of land and property. Additional S106 funding of £101,782.80 is also to be sought.

Item	**Estimated cost**
Phase one Playground works (Southern area)	£689,879
Phase two: Landscape works	£210,971
Total (works only):	£900,850
Contingency (20% works)	£180,170
On cost (20%)	£180,170
Total cost	£1,261,190
Playground section 106	£130,708
Total cost	**£1,391,898**

36. Securing the S106 funding outlined in this report will provide a total project budget of £1,391,898.

37. This will be sufficient to deliver the scheme and mitigate risks with a suitable contingency and cost.

38. Following the improvements, the maintenance of Bells Garden Playground will be included within existing revenue budgets.

Consultation

39. Statutory consultation has been completed as part of the planning application reference 21/AP/1077

40. Pre-Consultation Meeting – 26th July 2018, A series of project group meetings in 2018, 2019 and 2020. Landscaping Workshop - 26th August 2020.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Director of Planning and Growth

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

Strategic Director of Resources

42. The strategic director of resources notes the resource/financial implications contained in the report and confirms that the funding is available to support the project.

Assistant Chief Executive – Governance and Assurance

43. The Planning Committee has the authority to determine the recommendations in this report. Part 3F of the Council's constitution states that one of the functions of the planning committee (major applications) is to consider expenditure of funds over £100,000 of strategic importance secured through s106 agreements.

44. The report sets out the justification for expenditure of funds for a children's playground at Bells Garden Estate secured through legal agreements under s106 of the Town and Country Planning Act 1990.

45. Funds secured through section 106 agreements should be spent in accordance with the terms of the legal agreement.

46. The planning committee must have due regard to the public sector equality duty in making this decision. Officers have considered the duty at paragraphs 24 to 28 above and the committee should take into account in its deliberations.

47. Article 1.3(i) of the council's constitution confirms that all decisions made by the Council will consider the climate and equality (including socio-economic disadvantages and health inequality) consequences of taking that decision. This has been considered in paragraphs 20 to 23 and 29 to 30 above.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
The London Health Inequalities Strategy	GLA Kamal Chunchie Way, London E16 1ZE	Mayor of London Tel: 020 7983 4000
Link: https://www.london.gov.uk/programmes-strategies/health-and-wellbeing/health-inequalities/health-inequalities-strategy-implementation-plan-2025-2028		
Gateway 2 - Contract Award Approval Main Works Contract for the New Homes Delivery programme – Bells Gardens Community Centre 19 Buller Close London Southwark and Lindley Estate, 157-177 Commercial Way London Southwark SE15 1AU	160 Tooley Street London SE1 2QH	Nannette Sakyi - 020 7525 0956 Southwark Construction
Link: Decision - Gateway 2 - Contract Award Approval Main Works Contract for the New Homes Delivery Programme - Bells Gardens Community Centre and Lindley Estate - Southwark Council		
S106 legal agreements	160 Tooley Street London SE1 2QH	Nannette Sakyi 020 7525 0956 Southwark Council
Link: https://planning.southwark.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=ZZZV1JKBWR520		

APPENDICES

No.	Title
Appendix 1	Report: 21AP1077 Bells Gardens Community Centre 19 Buller Close London Southwark SE15 6UJ (please see equalities impact assessment paragraphs 199-229) Electronic only: please see Agenda for Planning Committee (Major Applications) B on Wednesday 10 September 2025, 6.30 pm - Southwark Council – agenda item 7

AUDIT TRAIL

Lead Officer	Stuart Davis, Managing Director Southwark Construction	
Report Author	Nannette Sakyi, Senior Project Manager, Southwark Construction	
Version	Final	
Dated	29 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
Strategic Director, Resources	Yes	Yes
Cabinet Member	No	No
Date final report sent to Constitutional Team		28 August 2025

Agenda Item 8

Meeting Name:	Planning Committee (Major Applications) B
Date:	10 September 2025
Report title:	To release £139,927.45 from Section 106 agreements for the delivery of Great Suffolk Street Area Scheme – Phase 2
Ward(s) or groups affected:	Borough and Bankside
Classification:	Open
Reason for lateness (if applicable):	N/A
From:	Director of Planning and Growth

RECOMMENDATION

1. That the Planning Committee (Major Applications) B approves the release of the funds amounting to £139,927.45, which were received by the council (pursuant to the terms of the legal agreements pertaining to the planning applications noted in Table 1, below) and are to be applied towards the Great Suffolk Street Area Scheme (the 'Scheme').

Table 1 - Summary of Requested Funding

Permission Ref:	Profit Centre	Type:	Clause	Address:	Indexation Amount	Amount:
12/AP/3558	W06785	Site Specific Transport Contribution	S3,1.1.7	90-91 and 92 Blackfriars Road, SE1 8HW	£8,107.42	£55,607.42
12/AP/3558	W06785	Strategic Transport Contribution	S3,1.1.9	90-91 and 92 Blackfriars Road, SE1 8HW	£9,212.95	£54,931.95
20/AP/1009	W07805	Footway Contribution	S2,1.3 - 1.4	25 Lavington Street London Southwark SE1 0NA	£3,308.08	£29,388.08
TOTAL:						**£139,927.45**

BACKGROUND INFORMATION

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

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

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

5. The Great Suffolk Street Area Scheme was installed under experimental traffic orders in October 2020 after highway data showed minor and residential roads in this area being used as cut-throughs ('rat runs'). The medieval streets were not designed to carry this extra volume of motor vehicle traffic, contributing to increasing noise/air pollution and safety issues for cyclists and commuters walking from stations.

6. The Great Suffolk Street Area Scheme consists of a 'cell' of minor roads, bordered by main roads (used by buses, lorries and non-local traffic), where "through" motor vehicle traffic is discouraged. The Scheme is a network of one-way systems that reduces traffic in the area by stopping east-west and north-south cut-through routes.

7. Reducing "through" traffic creates space for cyclists and pedestrians, encouraging more people to visit and walk through the area.

8. All emergency motorised vehicles and other traffic (walking, cycling, cargo bike) can still get through the area in the normal way. Residents and businesses based inside the area can still access by motor vehicle. Deliveries and collections are made as usual, but some access routes have changed.

9. After public consultation on Phase 1 (ETO), the scheme was made permanent in April 2022. Phase 2 (current—the Scheme) uses the extra

space created by Phase 1. Further details on the consultation are provided below.

10. Phase 2 additions and amendments include:

Road	Measure
Webber Street (from junction with Blackfriars Road to junction with Great Suffolk Street)	• Footway widening from Blackfriars Rd to Friars Primary School • Tactile paving at junction with Blackfriars Rd, Rushworth St and west of junction with Great Suffolk St • New bench • New dropped kerbs at junction with Blackfriars Rd, Rushworth St and at pedestrian crossing west of Great Suffolk St • Bi-directional cycleway (C10), including footway level stepped cycle track (eastbound) • Raised carriageway and ramp into Friars Primary School • Greening • Cycle stands • Alterations to utilities, utility covers, road signs, lamp posts and traffic lights (removals and relocations) • Amended road markings
Great Suffolk Street (from junction with Webber Street to junction with Southwark Street)	• Footway widening north of junction with Union St, and between Loman St and Pegasus House • New bench • Potential footway widening around junction with Lavington St • New dropped kerbs at pedestrian crossing south of Pocock St and entry to 'Union Way' • Bi-directional cycleway (C14) • Tactile paving at junctions with Union St, Copperfield St, Pocock St and Surrey Row, across 'Union Way' entry and south of Pocock St junction • Carriageway resurfacing from Union St to Loman St • Raised carriageway and ramps at junction with Pocock St, Surrey Row, Union St • Greening • Alterations to utilities, utility covers, road signs, lamp posts and traffic lights (removals and relocations) • Amended road markings
Union Street (from junction with Blackfriars Road to junction with Great	• Bi-directional cycleway • Tactile paving at junction with Blackfriars Rd, Great Suffolk St and hotel access • New dropped kerbs at hotel access and junction with Great Suffolk St • Raised carriageways with ramp to Union Yard Arches

Road	Measure
Guildford Street)	and junction with Great Suffolk St • Proposed zebra crossing at west side of junction with Great Suffolk St • Footway widening • Greening • Alterations to utilities, utility covers, road signs, lamp posts and traffic lights (removals and relocations) • Amended road markings
Lavington Street	• Greening, footway widening, dropped kerb and tactile paving at junction with Southwark St • Raised carriageway with ramp at junction with Southwark St • Amended road markings
Pocock Street (from the junction with Sawyer Street to the junction with Great Suffolk Street)	• Carriageway resurfacing (speed hump and east end of street) • Dropped kerb and tactile paving at junction with Sawyer St • Amended road markings

11. Should the committee resolve to approve the recommendation (as set out in paragraph 1 above), these sums shall be released to the Department of Environment, Neighbourhoods and Growth portfolio holder to be applied towards the implementation of the Scheme.

12. The Scheme aligns with Southwark's strategic transport objectives as set out in the Streets for People ("SfP") strategy, Streets for People Delivery Plan, Southwark Council Delivery Plan, Southwark Plan 2022, and Climate Change Strategy.

CONSULTATION

13. Community consultation was undertaken after introducing temporary Phase 1 improvements intended to reduce through-traffic and create space for active travel. Consultation took place online via Commonplace between December 2020 – April 2021, and a revised scheme was launched on 29 April 2021. Additional consultation was undertaken from July 2021 – September 2021 to allow residents to comment on whether the revised scheme should be made permanent, modified or removed. An online meeting was also held on 12 August to discuss the Scheme.

14. Phase 2 (the Scheme) considers resident feedback (both negative and positive) to ensure the permanent scheme benefits as many residents as possible. Above, a detailed list of improvements on each street within the area is provided. Phase 2 aims to use the space created in Phase 1 to

make active travel modes safer, easier, and more attractive.

KEY ISSUES FOR CONSIDERATION

15. As set out (in paragraph 1) above, the council is in receipt of funds amounting to £139,927.45 ("Financial Contributions"), which were paid to the council pursuant to the terms of the legal agreements entered into in relation to the developments noted above (in Table 1).

16. Poor-quality pavements prevent the uptake of walking and wheeling throughout Southwark. Pavements within the existing area are typically very narrow and unable to accommodate existing pedestrian flows. Recently approved developments are delivering a significant amount of commercial space, which is likely to further increase footfall.

17. Footway improvements are required to ensure pedestrians do not need to walk on the carriageway. The improvements will also help LBS achieve our Equal Pavements Pledge by ensuring individuals with mobility issues have a safe and uninterrupted route.

18. The scheme will provide new crossing points, dropped kerbs, tactile paving and raised carriageway at junctions to facilitate safe crossings and prioritise pedestrian movements.

19. In addition to improvements to the pedestrian environment, the Scheme will provide an enhanced cycling environment. While active travel modes are naturally prioritised by restricting through traffic, local traffic and delivery/servicing vehicles will continue to use carriageways. The proposals, therefore, include segregated cycle lanes and raised junctions to restrict motor vehicle movements, limit speeds, and increase cyclist safety at vulnerable points in their journeys.

20. Due to the limited pavement space and large carriageways, existing streets within the area lack greenery and other amenities, such as cycle stands. The scheme will introduce improvements to the public realm to create a more visually appealing and functional space that encourages walking, wheeling, and cycling.

21. The overall scheme seeks to achieve the following objectives:

- Reduce congestion and noise/air pollution cause by non-local private vehicles;
- Improve road safety in accordance with Vision Zero objectives to reduce on-street collisions;
- Provide improved cycleways to improve cycling experience;
- Provide new, wider, decluttered footways to improve the walking experience; and
- Public realm improvements.

22. The recommendation set out above (in paragraph 1) is to release the Financial Contributions to be applied towards the delivery of the Scheme. Without this funding, the issue of pedestrians walking in the carriageway would not be addressed, and the council would not be fulfilling its Streets for People objective of prioritising pedestrians and improving accessibility and safety for those walking or wheeling. Without delivering the upgraded carriageways designed to prioritise cyclist movements, motor vehicles will continue to pose a safety risk, contrary to Streets for People Objectives 4 and 5.

Policy framework implications

23. The recommendations contained within this report are consistent with the pledges and objectives set out in the Streets for People strategy (approved by Cabinet in July 2023), which outlines the council's ongoing commitment to and ambition for healthier neighbourhoods, cleaner air, thriving town centres and safer roads. The relevant SfP pledges are:

- Your home will be within 200m of a safe and pleasant walking route
- Your neighbourhood will have parking spaces for cycles, e-bikes, hire cars, electric vehicles and disabled parking
- Your street will have improvements to make it cleaner, greener and safer

24. The relevant SfP policy objectives are:

Objective 1 – Reduce the need to own or use a car

The proposed improvements reduce carriageway widths, ban certain vehicle movements, and provide segregated cycle infrastructure to facilitate active travel. Improved accessibility at junctions (dropped kerbs, tactile paving, etc.) may encourage people with disabilities or mobility challenges to walk instead of drive. Better walking and cycling infrastructure, as well as public realm improvements, will encourage all residents to make more journeys on foot or by bicycle instead of car.

Objective 2 – Create good quality space that is accessible to all people
The proposed measures include accessibility improvements such as new and wider pedestrian footways, raised crossings, and redesigned junctions for better safety and pedestrian priority.

Objective 4 – Improve safety and security for everyone using our streets.

The proposals will create a safer street for cyclists and pedestrians by providing upgraded infrastructure and crossings to reduce conflict with traffic and the potential for a collision with a motor vehicle.

Objective 5 – Make walking, cycling and wheeling easier

Implementing the Scheme, including new footways, wider footways, and

resurfacing of existing footways, plus carriageway resurfacing, will improve the cycling and walking environment.

Objective 6 – Make walking, cycling and wheeling easier for children and young people

It is proposed that new informal dropped crossings and controlled crossings be upgraded and provided to make walking easier for vulnerable road users. Wider footways and buildouts, as well as the removal of through traffic throughout the area, create a safer, less intimidating environment for children and young people to travel actively.

Objective 11 – Reduce emissions from transport and improve air quality

Providing a better walking and cycling experience will reduce car reliance, and more journeys by bicycle or on foot will reduce emissions from transport and improve air quality. The existing area scheme improves air quality by reducing the number of private vehicles travelling on local roads.

Objective 12 – Make streets greener and more resilient to extreme weather

Greening, including new planters and trees, will improve the appearance of streets within the area and improve drainage/flood risk.

25. The Scheme is consistent with the actions contained in the Streets for People Delivery Plan, and the proposed works are listed as a priority for year one in Zone A:

'We have already completed many necessary changes to traffic patterns in this area and through our Great Suffolk Street improvement scheme we will now look at reallocating the space we have created here so that it better reflects the way the street is used and in response to the things people told us they wanted in our Streets for People Consultation'.

26. The Scheme is consistent with the actions contained in the council's Delivery Plan (a policy document that sets out an action plan based on the council's priorities and its commitments (until 2026) to the residents of the borough):

- Working with local communities to design safer, greener and healthier streets for walking and cycling, prioritising areas with high health inequalities and low car ownership first.
- Improving safety at junctions and crossings
- Deliver on our equal pavements pledge, working with older people, those with disabilities and limited mobility to make sure Southwark's streets are accessible for everyone.
- Ensuring older and younger people, women and our Black, Asian and minority ethnic communities all have a full say, so we design streets and public transport that work for everyone.

- Make Southwark a Cycle Friendly borough

27. The Scheme is consistent with the actions contained in the council's Climate Change Strategy. This is a strategy and action plan that the council has committed to in order to make Southwark carbon neutral by 2030. The relevant section sets out priority for active and sustainable travel, in particular:

    Priority 2 – Active and Sustainable Travel – "Be a borough where walking and cycling becomes the default way to get around".
    - Increase cycle network coverage across the borough
    - Improve access to walking in the borough

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

Community impact statement

28. Implementing any transport project creates a range of community impacts. All transport schemes aim to improve the safety and security of vulnerable groups and support economic development by improving the overall transport system and access to it.

29. As set out above, the Scheme aligns with the objectives in the SfP strategy to provide an improved environment for walking and cycling.

30. Monitoring of the Scheme is ongoing; traffic counts have been completed since 2021. The most recent data is from Q3 2024-2025. If Phase 2 is implemented, monitoring will continue, and feedback will be considered to see if any further refinements are required to better suit the needs of the area.

Equalities (including socio-economic) impact statement

31. The Public Sector Equality Duty ("PSED") is set out in section 149 of the Equality Act 2010 ("2010 Act"), which requires the council, in the exercise of its functions, to have due regard to the need to:

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

32. An Equality Impact and Needs Assessment ("EINA") will be carried out prior to construction to fulfil the Council's PSED to assess the scheme's impact on groups with protected characteristics. As the Scheme is existing (Phase 1), it is not anticipated that the improvements will have any significant impact on groups with protected characteristics.

33. The EINA will identify persons with protected characteristics who would be most affected by the Scheme. Although not a protected characteristic under the 2010 Act, the EINA will also identify how social-economic factors can

negatively impact certain groups disproportionately. Therefore, the council takes into consideration in the EINA the way in which it could improve its services to mitigate the impact on those marginalised groups.

Health impact statement

34. The PSED 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. As mentioned above, it requires public bodies to have due regard to eliminating discrimination, advancing equality of opportunity, and fostering 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 the council's day to day business.

35. The Scheme is a product of extensive prior engagement through the SfP programme. In this borough-wide piece of work, Council Officers engaged with a total of 9,000 residents, including 200 residents in Borough and Bankside ward. The large-scale engagement assessed residents' transport uses and top concerns and interests. These responses were analysed and have contributed to the development of the Scheme.

36. This Scheme supports the TfL's mission to have zero people killed or injured on our streets by 2041 (Vision Zero). Reducing conflict between cyclists, pedestrians, and vehicles will reduce road traffic accidents.

37. Better facilities for wheelchair users, mobility scooters, and adapted cycles will benefit the mobility impaired, whether they are using the footway improvements or the upgraded cycle facilities.

38. Safer cycling and walking routes encourage active travel and less reliance on motor vehicles and, therefore, have health benefits for those who choose to walk or cycle more as a result of the changes.

39. The equality and health analysis demonstrates that the policy shows no potential for discrimination, and all appropriate opportunities have been taken to advance equality of opportunity in access to transport for people with different protected characteristics.

Climate change implications

40. The measures support the aims of the council's Climate Change Strategy under Priority 2 – Active and Sustainable Travel. Key aims of the Council's Climate Change Strategy include 'reducing car journeys to a minimum by 2030' and 'being a borough where walking and cycling becomes the default way to get around'. Part of meeting the borough's ambition of net zero emissions by 2030 includes a reduction in vehicle kms travelled and a shift to active and public transport. Transport currently accounts for 20% of the borough's emissions, of which around 99% come from on-road transport.

41. The proposed scheme supports residents' positive modal shift away from private car ownership and towards active travel. Reallocating space away from private cars to create cycle lanes and wider footways will help reduce reliance on car journeys. This prioritisation of streets for use by pedestrians and cyclists aligns with the Climate Change Strategy objective.

42. A just and inclusive transition is at the heart of the council's emerging climate policy. These proposals prioritise the movement of people first and foremost while retaining access for those who require it. In delivering a safer and more equitable highway network, the measures to be delivered in this Scheme are in accordance with the Council's approach to addressing the climate emergency.

43. Tree planting and greening are proposed as part of the improvement, and sustainable drainage will be proposed where possible.

44. A carbon cost budget will be set for the Scheme, and subsequent designs and construction plans will be planned to reduce carbon emissions during the project life cycle, including construction techniques and maintenance.

Resource implications

45. All staff resourcing implications will be contained within the existing Highways structure. Therefore, no additional resources will be required in this regard for the delivery of the Scheme.

Financial implications

46. The S106 funding pots detailed above will cover £139,927.45 of scheme delivery. The remainder of the scheme delivery will be funded by the Streets for People budget.

47. Once this report is approved, a new cost centre for the 2025-2026 financial year will be created for the "Great Suffolk Street Area Scheme".

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Director of Planning and Growth

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

Strategic Director of Resources

49. The strategic director of Resources notes the resource/financial implications contained in the report and confirms that the funding is available to support the project.

Assistant Chief Executive – Governance and Assurance

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

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

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

53. Council Assembly on 14 July 2021 approved a change to the council's Constitution to confirm that all decisions made by the council will consider the climate and equality (including socio-economic disadvantage and health inequality) consequences of taking that decision. This has been considered at paragraph 28-44 above.

54. The committee will note the consultation that has been carried out in connection with the proposal. The consultation had set out the issues that were requiring a response, provided sufficient time for those responses, and ensured that the results of the consultation were properly considered and taken into account in producing the final version of this document.

55. The principles of fair and adequate consultation have been followed, and officers have properly considered responses, making any necessary amendments before recommending the proposals to the committee for approval.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Copies of S106 All documents can be accessed online at:	Southwark Council 160 Tooley Street London SE1 2QH	Neil Loubser Tel: 020 7525 5451
Link: https://www.southwark.gov.uk/planning-and-building-control/planning-applications/planning-register-search-view-and-comment-on-planning-applications		
Council Delivery Plan	Southwark Council 160 Tooley Street London SE1 2QH	Tom Robison Tel: 020 7525 3752
Link: https://www.southwark.gov.uk/about-council/how-council-works/policies-plans-and-strategies/council-delivery-plan-and-annual		
Streets for People 2023	Southwark Council 160 Tooley Street London SE1 2QH	Tom Robison Tel: 020 7525 3752
Link: Streets for People Strategy - Southwark Council		
Streets for People Delivery Plan	Southwark Council 160 Tooley Street London SE1 2QH	Tom Robison Tel: 020 7525 3752
Link: Street for People - Delivery Plan		
Climate Change Strategy	Southwark Council 160 Tooley Street London SE1 2QH	Tom Sharland Tel: 020 7525 0959
Link: Climate Change Strategy - Southwark Council		
Streets for People Consultation Report and Background Information	Southwark Council 160 Tooley Street London SE1 2QH	Tom Robinson Tel: 020 7525 3752
Link: Street for People - Consultation report 2024		

APPENDICES

No.	Title
Appendix 1	General Arrangement Plan Drawings

AUDIT TRAIL

Lead Officer	Stephen Platts, Director of Planning and Growth	
Report Author	Emily Tadgell, Senior Transport Planner, Planning and Growth	
Version	Final	
Dated	29 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
Strategic Director of Resources	Yes	Yes
Director of Planning and Growth	Yes	Yes
Date final report sent to Constitutional Team		26 August 2025

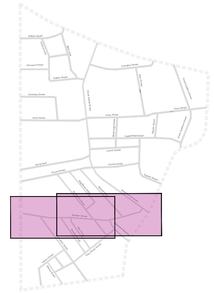
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4. UTILITY CHAMBERS SHOWN FOR REFERENCE. WHETHER A CHAMBER IS AFFECTED OR NOT WILL BE CONFIRMED IN DETAILED DESIGN.



KEY

- PROPOSED KERB WITH FULL UPSTAND
- PROPOSED DROPPED KERB
- PROPOSED SPLAYED KERB
- PROPOSED WHITE ROAD MARKINGS
- PROPOSED YELLOW ROAD MARKINGS
- PROPOSED RED ROAD MARKINGS
- RESURFACE EXISTING CARRIAGEWAY
- PROPOSED FOOTWAY - PRECAST CONCRETE PAVING FLAG
- PROPOSED FOOTWAY LEVEL STEPPED CYCLE TRACK
- PROPOSED RAISED CARRIAGEWAY - IMITATION GRANITE SETT PRECAST CONCRETE BLOCKS GREY RED
- PROPOSED FLAMED FINISH GRANITE SETTS
- PROPOSED PLANTER
- PROPOSED RAMP
- PROPOSED TACTILE PAVING
- B PROPOSED BOLLARD
- BB PROPOSED BELISHA BEACON
- SP PROPOSED SIGN POST
- PROPOSED CYCLE STAND
- EXISTING UTILITY COVER
- EXISTING COVER TO BE RAISED OR LOWERED
- EXISTING ITEMS TO BE REMOVED
- G UTILITIES / ROAD SIGNS / LAMP POSTS / TRAFFIC LIGHTS TO BE RELOCATED
- INDICATIVE LOCATION OF RELOCATED UTILITIES / ROAD SIGNS / LAMP POSTS / TRAFFIC LIGHTS

REV	REV. DATE	PURPOSE OF REVISION	DRAWN	CHKD	APPRVD
6.2	21/11/24	POCKOCK STREET DESIGN	DC	EK	DW
6.1	24/10/24	DOUBLE YELLOW LINE REVISION	DC	EK	DW
6.0	04/10/2024	REVISED OUTLINE DESIGN	AW	EK	DW

CLIENT: Southwark Council southwark.gov.uk

PROJECT: GREAT SUFFOLK STREET OUTLINE DESIGN

DRAWING TITLE: GENERAL ARRANGEMENT

DRAWING STATUS: DRAFT

SCALE	1:500 @ A1	DO NOT SCALE
SHEET	01 OF 05	

DRAWING NUMBER: 10501-MNRP-HGN-DR-01-01 REV 6.2

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POTENTIAL FOR FOOTWAY WIDENING

POTENTIAL FOR RAISING UTILITY COVER

RESURFACE EXISTING CARRIAGEWAY

PROPOSED RAMPS UNDER THE BRIDGE REDUCE AVAILABLE HEIGHT FOR VEHICLES - RESTRICTIONS TO BE INVESTIGATED AT DETAILED DESIGN STAGE

FEASIBILITY OF TREES NEED TO BE CHECKED WITH LONDON UNDERGROUND UTILITY

SCALE 1 : 500 10 0 10 20 30 Metres

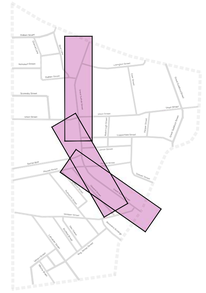
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PROJECT: GREAT SUFFOLK STREET OUTLINE DESIGN

DRAWING TITLE: GENERAL ARRANGEMENT

DRAWING STATUS: DRAFT

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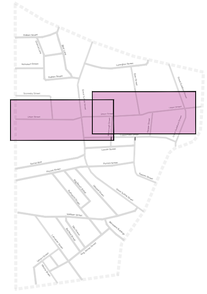
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- PROPOSED SPLAYED KERB
- PROPOSED WHITE ROAD MARKINGS
- PROPOSED YELLOW ROAD MARKINGS
- PROPOSED RED ROAD MARKINGS
- RESURFACE EXISTING CARRIAGEWAY
- PROPOSED FOOTWAY - PRECAST CONCRETE PAVING FLAG
- PROPOSED FOOTWAY LEVEL STEPPED CYCLE TRACK
- PROPOSED RAISED CARRIAGEWAY - IMITATION GRANITE SETT PRECAST CONCRETE BLOCKS GREY RED
- PROPOSED FLAMED FINISH GRANITE SETTS
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- PROPOSED TACTILE PAVING
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- G UTILITIES / ROAD SIGNS / LAMP POSTS / TRAFFIC LIGHTS TO BE RELOCATED INDICATIVE LOCATION OF RELOCATED
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REV	REV. DATE	PURPOSE OF REVISION	DRAWN	CHKD	APPRVD
6.2	21/11/24	POCKOCK STREET DESIGN	DC	EK	DW
6.1	24/10/24	DOUBLE YELLOW LINE REVISION	DC	EK	DW
6.0	04/10/2024	REVISED OUTLINE DESIGN	AW	EK	DW

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PROJECT

GREAT SUFFOLK STREET
OUTLINE DESIGN

DRAWING TITLE

GENERAL ARRANGEMENT

DRAWING STATUS

DRAFT

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SHEET	03 OF 05	

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POTENTIAL FOOTWAY WIDENING

4.0
1.9
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2.0
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2.0
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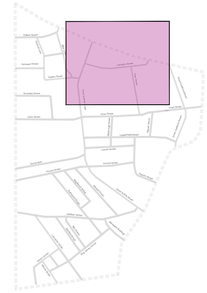
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3. PROPOSED STREET FURNITURE POSITIONS ARE INDICATIVE ONLY. EXACT LOCATIONS TO BE DETERMINED AT DETAILED DESIGN STAGE.

4. UTILITY CHAMBERS SHOWN FOR REFERENCE. WHETHER A CHAMBER IS AFFECTED OR NOT WILL BE CONFIRMED IN DETAILED DESIGN.



KEY

- PROPOSED KERB WITH FULL UPSTAND
- PROPOSED DROPPED KERB
- PROPOSED SPLAYED KERB
- PROPOSED WHITE ROAD MARKINGS
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REV	REV. DATE	PURPOSE OF REVISION	DRAWN	CHKD	APPRVD
6.2	21/11/24	POCKOCK STREET DESIGN	DC	EK	DW
6.1	24/10/24	DOUBLE YELLOW LINE REVISION	DC	EK	DW
6.0	04/10/2024	REVISED OUTLINE DESIGN	AW	EK	DW

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OUTLINE DESIGN

DRAWING TITLE
GENERAL ARRANGEMENT

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Agenda Item 9

Meeting Name:	Planning Committee (Major Applications) B
Date:	10 September 2025
Report title:	Release of £428,834.94 of S106 Funds to support the delivery of the Lost Peck Flood Alleviation and Environmental Enhancement Scheme
Ward(s) or groups affected:	Funds: Camberwell Green, Surrey Docks, Rye Lane, Peckham Project: Rye Lane
Classification:	Open
Reason for lateness (if applicable):	No
From:	Director of Planning and Growth

RECOMMENDATIONS

1. That the Planning Committee (Major Applications) B approves the release of the S106 funds totalling £428,834.94 (which were paid to the council under the terms of the legal agreements pertaining to the applications noted in paragraph 47 below) for use on the Lost Peck Flood Alleviation and Environmental Improvement Scheme.

BACKGROUND INFORMATION

2. Planning obligations are the legal obligations secured for the purposes of mitigating the impacts of a development proposal and contribute to providing the infrastructure and facilities necessary to achieve sustainable communities. These obligations are secured in legal agreements (colloquially known as, Section 106 agreements) and are entered into by parties with property interests in the development site. This is to ensure that they are binding on the owners of the site and the developers (should they have or subsequently acquire such interests, as the obligations run with the land). These obligations can take the form of a variety of different things and can include the requirement to pay financial contributions to the council. And therefore, receipted financial contributions are often referred to as S106 funds/monies.

3. The Lost Peck Flood Alleviation and Environmental Improvement Scheme is a project designed to protect 111 properties from surface water flooding in events up to and including the 1 in 75-year event (and this is the highest number of properties protected by one scheme in London funded through Environment Agency (EA) Grant in Aid funding). This scheme is made up of two components: flood alleviation and environmental enhancement.

4. The scheme consists of two bunds (embankments) that will hold back surface water runoff during storm events up to and including the 1 in 75-year event. This will provide major surface water flooding benefits in Peckham and protect 111

properties. The cost of the flood alleviation component is estimated at £2.4 million, comprising £310,000.00 of appraisal costs, £1,886,449 of construction costs, and £181,625 of risk contingency and optimism bias.

5. Areas in Peckham Rye have been identified as at risk of flooding from surface water in 2040. Based on flood risk modelling, including climate change allowances, an estimated 13 residential properties in Peckham Rye (which are considered at risk in 2040) will be better protected with the implementation of this scheme.

6. Annual damages avoided due to this scheme's implementation are £6.8 million, as identified within the Environment Agency Partnership Funding Calculator, representing a significant economic benefit to the local area.

7. The council has secured external funding through the Environment Agency and Thames Regional Flood and Coast Committee (RFCC). The quantum of funding received from these sources is directly proportional to the number of properties protected by the scheme.

8. The Outline Business Case (OBC) and funding application for £1.7 million were submitted and approved by the EA's National Project Assurance Board. The application comprises £1,386,301 of Flood Defence Grant-in-Aid (FDGiA) and £750,000 of levy funding.

9. Based on the approved OBC, detailed designs were developed for the scheme. These designs were submitted as part of a planning application (ref. 23/AP/3031), which received approval subject to conditions in April 2024.

10. The scheme began construction works in July 2024, and the drainage works were fully completed in November 2024. Landscaping works in Peckham Rye Park and Common were completed in October 2024. Since its construction, the scheme has already provided drainage benefits in storm events, demonstrating its flood risk benefits to the local area.

11. In addition to alleviating floods within the Park and Common, the scheme will deliver environmental enhancements such as including a natural corridor in the green space triangle just north of East Dulwich Road (the 'Northern Triangle'), targeted planting, biodiversity improvements, and redevelopment of the derelict wide footway just south of East Dulwich Road ('Donkey Ride') to improve public access.

12. The EA will not fund the environmental improvements associated with the scheme.

13. A contribution of £70,000 has been secured from the council's *"Cleaner, Greener, Safer"* fund, specifically for improvements to the 'Donkey Ride' area along East Dulwich Road.

14. The £428,834.94 sought here will contribute to environmental enhancements that will complement the flood alleviation scheme.

15. The total cost of this scheme is £2.625 million. The budget breakdown of the

scheme is as follows:

- Flood Defence Grant in Aid: £1,386,301.00
- Local Levy: £750,000.00
- Cleaner, Greener Safer: £75,000.00
- S106: £419,053.62

16. Site photographs are included in Appendix 3.

KEY ISSUES FOR CONSIDERATION

17. This project supports the council's commitment to meeting the needs of diverse communities in Southwark by delivering a flood alleviation scheme that contains biodiversity and amenity improvements, which will benefit residents within areas of deprivation in Southwark.

18. The scheme integrates environmental and flood alleviation objectives, providing multiple benefits to the community, improving biodiversity and enhancing the local environment. These include:

    - enhancement of the current under-utilised green space immediately north of East Dulwich Road

    - creating connectivity between existing green spaces

    - enhancing the biodiversity value of the Park and Common through the targeted use of suitable planting mixes

    - improving the currently derelict historic 'Donkey Ride' area along East Dulwich Road, reclaiming this aspect of the Common and creating a positive, safe space for residents to walk along and enjoy. This is partly funded by an allocation from the Cleaner, Greener, Safer (£70,000) opportunity.

    - celebrating and recognising the history of the "lost" River Peck, as well as educating residents on the purpose of the bunds that have been constructed, through signage boards.

19. By implementing improvements in the public realm, the council is improving the environment and social integration of the area, providing opportunities for interaction.

20. The scheme has also formalised the main access point to the Common from East Dulwich Road, providing a newly surfaced access point. This ensures the Common is fully accessible to all, without prejudice or discrimination.

21. Officers consider that the scheme would not negatively impact age, disability, faith, religion, race, ethnicity, or sexual orientation.

22. Officers consider that the scheme will not disproportionately affect any community or group.

Policy framework implications

23. The scheme helps the council deliver on the Fairer Future Promises by making the Borough a greener and safer place to live.

24. The scheme meets the following Council Commitments:

- A place to call home
- A place to belong
- A greener borough
- A healthier life
- A safer community

25. The scheme aligns with the newly adopted 'Southwark Local Flood Risk Management Strategy'. The scheme aligns with the following objectives:

- A: To improve community awareness of local flood risks and the authorities responsible for managing them.
- B: Collaborate with internal departments, organisations, authorities, and partnership groups to support successful communication in managing flood risk.
- D: To apply knowledge of local flood risk to improve Southwark's resilience to the impacts of climate change.

26. The scheme also aligns with the 'Southwark Surface Water Management Plan', which aims to manage surface water. It also aligns with Action 7 from the Surface Water Management Plan, *which states, "Design and build financially viable schemes that offer the potential for multiple benefits."*

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

Community impact statement

27. The scheme improves amenities for residents, which is hoped will increase community interaction with the Park and Common, allowing more residents to enjoy the space.

Equalities (including socio-economic) impact statement

28. Key stakeholders for Peckham Rye Park and Common are the Friends of Peckham Rye Park group, the Peckham Society, residents' associations and the council (inc. Lead Local Flood Authority, Parks and Trees teams).

29. The council, the Environment Agency, and Thames Water are the key stakeholders involved in the scheme's decision-making process.

30. The scheme's socio-economic benefits include improved flood resilience for residents, improved biodiversity due to landscaping, and improved amenity, providing a more enjoyable setting for social gatherings.

31. The Public Sector Equality Duty as set out in section 149 of the Equality Act

2010 requires public bodies to consider those with protected characteristics (which includes age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation) when carrying out their day-to-day work, in shaping policy and delivering services. It applies to every aspect of local government decision making and requires decision makers 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.

32. Officers consider that the increased access to the Common will improve accessibility for disabled residents and those with pushchairs.

33. Officers also consider that the decision to approve the release of the s106 funds here will not negatively impact on the gender reassignment, pregnancy and maternity, race, religion and belief, sex, sexual orientation or human rights as a result.

34. A full equality impact assessments was undertaken as part of the planning process to ensure that there is no disproportionate or discriminatory impact on groups with protected characteristics.

Health impact statement

35. Officers consider that there will be no negative impacts on health because of this scheme.

Climate change implications

36. Sustainability has been a key consideration during the construction of the scheme, with the following steps taken:

- solar panels used to power site office and welfare cabins, instead of petrol generators;
- temporary construction signage produced made of aluminium, which can be recycled after the scheme is complete;
- car sharing and public transport are encouraged as a method of travelling to and from the site; and
- materials reused, wherever possible, to reduce the amount of material requiring disposal post-construction.

37. The scheme aligns with the council's Climate Change Strategy, as its primary focus is reducing flood risk and providing resilience to climate change. A climate change allowance was included in the modelling for this scheme, which the EA approved as part of the OBC process.

38. The landscaping implemented as part of this scheme will help the community adapt to climate change by encouraging habitat creation and growth and reducing the urban heat island effect.

Resource implications

39. The scheme has been delivered by the council's Flood Risk Management team,

with support from Metis Consultants under the council's Professional Services Framework. Metis Consultants fulfilled the role of principal designer.

40. Volker Stevin Infrastructure Limited was the principal contractor on this scheme, appointed through the Environment Agency's procurement framework on an NEC Option C contract.

41. This report is seeking approval for the release of the s106 funding totalling £428,834.94. And if so approved by the committee, budget needs to be added to the project "Flood Prevention (Highways drainage gulley replacement) Programme" cost code "L-5110-0080**."** As this project has already been delivered, these funds will reimburse the costs of works completed as per the recommendations of this report.

Financial implications

42. There are financial implications because of this scheme. This scheme has been constructed and was done so on the knowledge of having a full budget, of which the Section 106 allocation was a part. Suppose the recommendation set out in paragraph 1 of this report (for the release of the funds) is not approved by the committee. In that case, the scheme will be at a deficit, which will have severe reputation and financial implications for the council.

Consultation

43. Prior to the commencement of the constructions works, several councillors were consulted and expressed their support for the scheme, for example:

    a. Councillor Barrie Hargrove, Cabinet Member for Communities, Safety & Leisure, said on 16 February 2018. *"I am very happy to express my support for this flood alleviation scheme and its objectives as set out, in the knowledge that you and your team will deliver it to the high and publicly sensitive standards of the other flood alleviation projects you have developed."*;

    b. Councillor Ian Wingfield, Cabinet Member for the Environment & Public Realm, said on 16 February 2018. *"As the relevant Cabinet Member in Southwark and a local resident in Peckham Rye I fully support all the Flood Alleviation and Improvement Scheme and all the project objectives. In particular, I would like to stress the importance of reclaiming the 'donkey ride' area, enhanced pedestrian pathways, improved air and noise quality, and recognising the history of the Lost River Peck. The Scheme will make the Peckham Rye area far more attractive and accessible to be enjoyed by residents of all ages, abilities and backgrounds."*; and

    c. Mr. Barber, a former Liberal Democrat councillor who represented East Dulwich in the London Borough of Southwark, said on 18 February 2018. *"I fully support these proposed measures to alleviate flood risk in the area. I've witnessed first-hand the impact of flooding in local residents and the extreme distress it caused them and support these measures to help avoid this risk."*.

44. Extensive public consultation and engagement were undertaken for the scheme. Consultation was initiated in June 2015 and included social media, community workshops, site visits, online consultation, letter drops, and attendance at community meetings. The council engaged with relevant groups, including the Friends of Peckham Rye Park, the Peckham Society, and local residents' associations, and will continue to work with stakeholders throughout the detailed design and implementation stages.

45. Following meetings with local community groups, an online questionnaire was released to the wider public between June and August 2018; 80 residents responded, and 72% of respondents agreed that the scheme is the right approach to flood mitigation in the area, with 20% unsure and 8% in disagreement. On completion of the online consultation, an exhibition was held on Saturday, 8 September 2018, where the results were presented. The event allowed residents to receive feedback on the online consultation and offered opportunities for those concerned about the scheme to discuss it with the project team.

46. The scheme underwent a planning application (ref. 23/AP/3031), which included a public consultation (and comments received from residents were noted and incorporated into the updated designs, where possible). The application was heard at the Smaller Applications Committee on 24 April 2024, where it was recommended for approval subject to conditions. As part of this application, public consultation was undertaken.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Director of Planning and Growth

47. Summary of Requested Funding.

Permission Ref	Account No	Type	Indexation	Amount
14/AP/0175	725	Public Realm Improvements	£2,521.88	£64,021.88
14/AP/0257	732	Public Realm Improvements	£300,98	£23,550.98
13/AP/2311	745	Indexation	£0.00	£5,035.70
09/AP/0841	462	Public Realm Improvements	£0.00	£6,090.00
11/AP/1097	380	Public Realm Improvements	£2,288.74	£55,538.74
14/AP/1085	803	Public Realm Improvements	£878.06	£11,378.06
14/AP/1085	803	Parks and Public Open Space	£378.57	£4,905.57
16/AP/2681	799	Publ O/Space, Childrens Play, Sport Devt	£1,585.58	£ 37,825.58
14/AP/0175	725	Publ O/Space, Childrens Play, Sport Devt	£9,008.43	£ 105,875.43
14/AP/3277	758	Publ O/Space, Childrens Play, Sport Devt	£0.00	£114,613.00

Permission Ref	Account No	Type	Indexation	Amount
			Total	**£428,834.94**

48. As mentioned above, £428,834.94 has been secured (in the legal agreements for the developments to which the [application] reference numbers noted above (in paragraph 46) relate) by way of financial contributions towards the public realm, site-specific transport, and strategic transport improvements. All of this money is currently unallocated and available for expenditure.

49. Southwark Council resource was utilised from within the Flood Risk Management team to manage the delivery of this project, meaning there were no additional resource requirements from the Council.

Assistant Chief Executive – Governance and Assurance

50. The report recommends the release of £400,000 from a number of section 106 Agreements in order to fund the improvements envisaged by the Lost Peck Flood Alleviation Scheme as described in this report. Paragraphs 19 and 20 of the report refer to the consultation with ward councillors and also the wider community.

51. Members will be aware that any expenditure of section 106 monies needs to be strictly in accordance with the terms of the relevant agreement and also in accordance with the tests which are set out in regulation 122, Community Infrastructure Levy Regulations 2010 (as amended).

52. The section 106 Agreements mentioned at paragraphs 1 of this report have been reviewed in order to ensure that the proposals for expenditure are in accordance with the purposes for which the identified contributions were made. The precise wording in each Agreement varies slightly but allows for expenditure on Public Realm improvements or tree planting. In view of the purposes of the proposed expenditure which have been reported, Members are advised this is consistent with the terms of the various planning agreements.

53. Paragraphs 16 to 18 of the report address the duty required from public authorities by virtue of the Equality Act 2010 and considers that there is no harmful impact on persons from a group with a protected characteristic although it is of course for Members to make this final assessment.

54. In accordance with the council constitution, the expenditure of section 106 monies where they exceed £100,000 is one of the functions of the Planning Committee.

Strategic Director of Resources

55. This report seeks to approve the release of £425,834.94 from the Section 106 agreements listed in paragraph 47 for the purposes of funding the improvements by the Lost Peck Flood Alleviation Scheme.

56. The Strategic Director of Resources also notes the resource/financial implications contained in the report and confirms the council has received the

related S106 funds and that the funds are available for the purposes outlined in this report.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Drainage Design Package	Southwark Council 160 Tooley Street London SE1 2QH	Nick Metcalfe Tel: 07949 314 341
Link: https://planning.southwark.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=S3E4VTKBJU800		
Background Papers	**Held At**	**Contact**
Landscaping Design Package	Southwark Council 160 Tooley Street London SE1 2QH	Nick Metcalfe Tel: 07949 314 341
Link: https://planning.southwark.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=SH198HKBJGO00		
Background Papers	**Held At**	**Contact**
Site Photographs	Southwark Council 160 Tooley Street London SE1 2QH	Nick Metcalfe Tel: 07949 314 341
Link: https://planning.southwark.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=S3E4VTKBJU800		

APPENDICES

No.	Title
Appendix 1	Lost Peck Equalities Impact Assessment
Appendix 2	Surface Water Management Plan Electronic only: please see Agenda for Planning Committee (Major Applications) B on Wednesday 10 September 2025, 6.30 pm - Southwark Council – see agenda item 9

AUDIT TRAIL

Lead Officer	Steve Grayer, Interim Head of Highways, Highways Division	
Report Author	Nick Metcalfe, Project Manager, Flood Risk Management Team, Highways Division	
Version	Final	
Dated	28 August 2025	
Key Decision?	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	**Comments Sought**	**Comments Included**
Assistant Chief Executive – Governance and Assurance	Yes	Yes
Strategic Director, Resources	Yes	Yes
Cabinet Member	No	No
Date final report sent to Constitutional Team		26 August 2025

APPENDIX 1

Brief description of development proposal
Flood risk, landscaping, environmental and public access improvements and the construction of 2 x earthworks bunds along the length of the northern and western boundaries of the common and park, along with associated underground drainage chambers.

Section 1 – Users and Stakeholders in the Decision Making Process

Who are the key stakeholders and users of your site?
Key stakeholders - Friends of Peckham Rye Park, the Peckham Society and local residents' associations, Southwark Council. Users of the site – Local community, Children attending Harris Boys' Academy East Dulwich, Harris Girls' Academy East Dulwich, Bellenden Primary and Blossoms Montessori Childrens house, local residents, Southwark Council.

Who are the key stakeholders involved in the decision-making process for the proposed scheme?
Southwark Council, Environment Agency, Thames Water

Section 2 – Equality Impact and Needs Analysis

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 development to meet diverse needs, promote equality, tackle inequalities and promote good community relations. It is not just about addressing negative impacts.

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 scheme including the impact on current users	**Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative) including the impact on current users**
Reduced flood risk Improved amenity and biodiversity Improved access to the Park and Common	Improved flood resilience Improved amenity providing a more enjoyable setting for social gatherings (families, picnics etc.)
Equality information on which the above analysis is based	**Socio-economic data on which above analysis is based**
N/A	N/A
Mitigating actions and/or improvements to be taken	**Mitigating actions and/or improvements to be taken**
N/A	N/A

Disability - A person has a disability if s/he has a physical or mental impairment that has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

Potential impacts (positive and negative) of proposed scheme including the impact on current users	**Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative) including the impact on current users**
Increased access to the common for disabled residents by formalising previously inaccessible paths.	
Equality information on which the above analysis is based	**Socio-economic data on which above analysis is based**
N/A	N/A
Mitigating actions and/or improvements to be taken	**Mitigating actions and/or improvements to be taken**
N/A	N/A

Gender reassignment - The process of transitioning from one gender to another.

Potential impacts (positive and negative) of proposed scheme including the impact on current users	**Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative) including the impact on current users**
N/A	N/A
Equality information on which the above analysis is based	**Socio-economic data on which above analysis is based**
N/A	N/A
Mitigating actions and/or improvements to be taken	**Mitigating actions and/or improvements to be taken**
N/A	N/A

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 scheme including the impact on current users	**Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative) including the impact on current users**
N/A	N/A
Equality information on which the above analysis is based	**Socio-economic data on which above analysis is based**
N/A	N/A
Mitigating actions and/or improvements to be taken	**Mitigating actions and/or improvements to be taken**
N/A	N/A

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 scheme including the impact on current users	**Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative) including the impact on current users**
N/A	N/A
Equality information on which the above analysis is based	**Socio-economic data on which above analysis is based**
N/A	N/A
Mitigating actions and/or improvements to be taken	**Mitigating actions and/or improvements to be taken**
N/A	N/A

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 scheme including the impact on current users	**Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative) including the impact on current users**
N/A	N/A
Equality information on which the above analysis is based	**Socio-economic data on which above analysis is based**
N/A	N/A
Mitigating actions and/or improvements to be taken	**Mitigating actions and/or improvements to be taken**
N/A	N/A

Sex - a man or a woman.

Potential impacts (positive and negative) of proposed scheme including the impact on current users	**Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative) including the impact on current users**
N/A	N/A
Equality information on which the above analysis is based	**Socio-economic data on which above analysis is based**
N/A	N/A
Mitigating actions and/or improvements to be taken	**Mitigating actions and/or improvements to be taken**
N/A	N/A

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 scheme including the impact on current users	**Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative) including the impact on current users**
N/A	N/A
Equality information on which the above analysis is based	**Socio-economic data on which above analysis is based**
N/A	N/A
Mitigating actions and/or improvements to be taken	**Mitigating actions and/or improvements to be taken**
N/A	N/A

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 scheme including the impact on current users	**Potential socio-economic impacts/ needs/issues arising from socio-economic disadvantage (positive and negative) including the impact on current users**
N/A	N/A
Equality information on which the above analysis is based	**Socio-economic data on which above analysis is based**
N/A	N/A
Mitigating actions and/or improvements to be taken	**Mitigating actions and/or improvements to be taken**
N/A	N/A

Section 3 - Conclusions

Summarise the main findings and conclusions of the overall equality impact and needs analysis for this area
There will be no negative equality impact as a result of the proposed scheme. The scheme shall provide positive disability access to the Park and Common.

Summarise any benefits and mitigation required
The development will improve disabled access to the site. The proposed disabled access, as illustrated on drawing 60430773/C0030/DR/002 and 004, Appendix A, will link the northwest entrance and existing paths to the existing informal path south of the proposed bund.

Agenda Item 10

Meeting Name:	Planning Committee (Major Applications) B
Date:	10 September 2025
Report title:	To release £5,078,652.01 from Section 106 agreements to TfL to deliver improvements to bus services on Old Kent Road and Elephant and Castle (Bakerloop bus)
Ward(s) or groups affected:	Old Kent Road, Chaucer, North Walworth, South Bermondsey, Faraday
Classification:	Open
Reason for lateness (if applicable):	No
From:	Director of Planning and Growth

RECOMMENDATION

1. That the Planning Committee (Major Applications) B approves the release of the funds amounting to £5,078,652.01 to TfL, which were received by the council (pursuant to the terms of the s106 agreements pertaining to the planning applications noted in Table 1, below) and are to be applied to improving bus services on Old Kent Road and Elephant and Castle.

Table 1 - Section 106 Contributions to be released to TfL

Planning application reference	Profit centre	Spend category	Ward	Address	S106 Contribution	Indexation	Total Amount
12/AP/1092	W06635	Bus contributions	North Walworth	Heygate Estate	£1,100,000	£270,769.24	£1,370,769.24
17/AP/3757	W08425	Bus contributions	Old Kent Road	60A And 62 Hatcham Road	£56,600.90	£1,546.36	£58,147.26
20/AP/0039	W09125	Bus contributions	Old Kent Road	43 Glengall Road And 1 Bianca Road	£729,000	£51,118.90	£780,118.90
18/AP/2895	W08785	Bus contributions	Old Kent Road	2 Varcoe Road	£17,760	£3,782.99	£21,542.99
22/AP/1221	W09415	Bus contributions	Old Kent Road	Tustin Estate Land (Phase 1)	£329,400.00	n/a	£329,400.00
19/AP/1773	W09195	Bus contributions	Old Kent Road	227-255 Ilderton Road	£683,100	£180,358.72	£863,458.72
20/AP/1329	W09475	Bus contributions	Old Kent Road	313-349 Ilderton Road	£156,600	£28,646.34	£185,246.34
22/AP/0554	W09785	Bus contributions	Old Kent Road	The Ledbury Estate	£64,800	£3,031.06	£67,831.06
20/AP/2701	W09495	Bus contributions	Old Kent Road	671-679 Old Kent Road	£288,900	£42,723.65	£331,623.65

Planning application reference	Profit centre	Spend category	Ward	Address	S106 Contribution	Indexation	Total Amount
17/AP/4612	W08525	Bus contributions	Old Kent Road	49-53 Glengall Road	£162,900	£29,814.89	£192,714.89
19/AP/1322	W09385	Bus contributions	Old Kent Road	840 Old Kent Road	£592,281.24	£0	£592,281.24
19/AP/5389	W09745	Bus contributions	Chaucer	221 New Kent Road	£234,000	£51,517.72	£285,517.72
Total							**5,078,652.01**

BACKGROUND INFORMATION

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

3. The council's former S106 and CIL Supplementary Planning Document (SPD) 2015 (updated November 2020) provided detailed guidance on the council's use of planning obligations and CIL. On 7 July 2025 the Cabinet resolved that the new Section 106 (S106) and Community Infrastructure Levy (CIL) Supplementary Planning Document (SPD) be adopted.

4. The draft Old Kent Road AAP and Southwark Plan 2022 dictate a phased approach to the provision of housing in the Old Kent Road Opportrunity Area. 9,500 homes can be accommodated through an upgrade to existing transport infrastructure, including bus services and improved conditions for walking and cycling. A second phase of 10,500 homes is reliant on the Bakerloo Line Extension (BLE).

5. In 2022 the council and TfL commissioned a bus demand and capacity study for the Old Kent Road which found that additional services would be required to support anticipated growth in homes in phase 1. To date, almost 9,500 homes have been consented in the Old Kent Road opportunity area and there are 3,242 under construction or completed since 2018. In accordance with the draft AAP, the council has been collecting funds for improvements to bus services from new developments, with developers paying £2,700 per home as a contribution.

6. Between January and March 2025 TfL consulted on a new Bakerloop bus service. This will be an express service between Waterloo and Lewisham, stopping at Elephant and Castle and future stations at Burgess Park (Old Kent Road junction with Dunton Road), Old Kent Road (junction with Ilderton Road), New Cross and Lewisham (see Figure 1). It will be part of the TfL's superloop bus services, running 7 days a week, operating between 05:00 and 00:30, providing 5 buses per hour from Monday to Saturday (every 12 minutes) and 4 buses per hour on Sundays.

7. Most the buses will be decorated with Bakerloo Line livery with the aim of keeping the extension proposals at the forefront of people's attention and signalling a key improvement made to the local bus network.

8. Following consultation carried out earlier in 2025 TfL are aiming to launch the service in autumn 2025.

Figure 1 Proposed Bakerloop route map



9. The Bakerloop is not intended as a replacement for the proposed Bakerloo Line Extension but as an interim measure to improve transport prior to the opening of the line.

10. The council is promoting the Bakerloo Line Upgrade and Extension with GLA, TfL, Lewisham and north London boroughs. In 2020 Southwark contributed £7,500,000 towards an enlarged ticket hall at Elephant and Castle station, ensuring it has the capacity to accommodate the Bakerloo Line Extension. Subsequently, in 2021 the Secretary of State for Transport safeguarded the tunnel alignment and station locations required for the extension.

11. TfL have a funded team working on the project who have been developing the design. In 2024, with contributions of £250,000 each from Southwark and Lewisham, TfL appointed Weston Williamson architects to undertake the feasibility design of the stations. In the same year Southwark, Lewisham, TfL and Central London Forward jointly contributed to a funding study which aimed to assess the contribution which London could make towards the construction of the extension. This investigated a variety of funding sources including local and Mayoral CIL, a London-wide business rate supplement (currently being used to help fund the Elizabeth line) and ring fencing of growth in revenue from business rates. Using a range of sources, the study estimates that London could raise over 50% of the funds required.

12. TfL and Southwark are working to a timetable that would see the project submitted to Parliament for a Transport and Works Act Order in 2028, with construction starting around 2030 and the extension opening in 2038.

CONSULTATION

13. Consultation has been undertaken by TfL in relation to the proposed Bakerloop bus service. Consultation took place over 6 weeks, closing on 14 March 2025. In June 2025, TfL published a consultation report. There were 1,298 responses to the consultation. The Majority of feedback from residents and local stakeholders was positive and the proposals were widely supported, with many respondents stating that a new route BL1 would:

    - Be more convenient (82 per cent)
    - Result in a quicker bus journey time (79 per cent)
    - Be used between a few days and every day per week (55 per cent)

KEY ISSUES FOR CONSIDERATION

14. The draft Old Kent Road AAP identifies the need for additional bus services to help accommodate growth associated with phase 1 of development. As is noted above, Phase 1 is well underway with almost 9,500 homes consented and 3,242 recently completed and under construction. Developments around the Old Kent Road contribute funds to improve bus services and c£5,000,000 has been collected to date. TfL is aiming to run the service for 7 years at least and the council's contribution would comprise approximately 15% of the total commitment.

15. The developments in Table 1 above are all located in the Old Kent Road ward, with the exception of 221 New Kent Road and the former Heygate development. The proposed stops on the new Bakerloop service will all be located within a short walk of the developments identified and within the expected catchment of the new service. It is also worth noting that the funds would support previous investment by Southwark and TfL in improving the Northern Line Ticket Hall and Elephant and Castle northern roundabout, both of which are necessary to support development in the Old Kent Road opportunity area and the proposed Bakerloop.

16. In making contributions towards improving bus services, the monies will be spent in accordance with the terms identified in the relevant s106 agreements.

Policy framework implications

17. The proposal aligns with the draft Old Kent Road AAP which has identified a need to improve bus services to support development of 9,500 homes in phase 1. Funds have been collected accordingly from all consented and implemented developments in the Old Kent Road opportunity area.

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

Community impact statement

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

Equalities (including socio-economic) impact statement

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

    - eliminate discrimination, harassment and victimisation and any other conduct prohibited by the Act;
    - advance equality of opportunity between persons who share a relevant protected characteristic and those who do not;
    - foster good relations between persons who share a relevant protected characteristic and those who do not.

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

21. TfL have completed an initial Equalities Impact Assessment of the new service. TfL do not expect it to have negative impacts on groups with protected characteristics. The new service could benefit all passengers, including the elderly people, those with disabilities, and people on low incomes. The anticipated benefits include faster journey times, extra space on buses, encouraging more sustainable journeys and with the “Hopper fare”, the ability to take a second bus journey at no extra cost. Council officers have reviewed TfL’s Equalities Impact Assessment and, having considered the information provided, are satisfied it is sufficient for the purposes of discharging the council’s Public Sector Equality Duty under the Equality Act 2010.

Health impact statement

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

Climate change implications

23. The project will encourage travel by public transport, helping reducer car journeys. TfL anticipates that the Bakerloop service will operate with electric vehicles, although it may not be possible at the time of its launch.

Resource implications

24. All staff resourcing implications and the project managing will be contained within the existing resources.

Financial implications

25. Southwark's contribution to the service would be £5,078,652.01 from the s106 contributions listed in Table 1. This represents approximately 14% of the total cost of delivering the service over a 7-year period. TfL' will commit the balance of the funding required. The funding will be subject to a grant award with TfL. Should the service cease to operate, Southwark would be entitled to reclaim funds not spent.

26. Once this report is approved, a new capital cost code will be created for the Bakerloop service with the appropriate budget.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Assistant Chief Executive – Governance and Assurance

27. The Planning Committee has the authority to determine the recommendations in this report. Part 3F of the council's constitution states that one of the functions of planning committee (major applications) is to consider expenditure of funds over £100,000 of strategic importance secured through s106 agreements.

28. The report sets out the rationale for the expenditure of funds secured through legal agreements under s106 of the Town and Country Planning Act 1990, towards improving TfL bus services on Old Kent Road and Elephant and Castle.

29. Funds secured through section 106 agreements must be spent in accordance with the terms of the relevant legal agreement.

30. The planning committee must have due regard to the public sector equality duty in making this decision. Officers have considered the duty at paragraphs 19 to 21 above and the committee should into account in its deliberations.

31. Article 1.3(i) of the council's constitution confirms that all decisions made by the Council will consider the climate and equality (including socio-economic disadvantage and health inequality) consequences of taking that decision. This has been considered in paragraphs 22 to 23.

Strategic Director of Resources

32. This report seeks approval to release £5,078,652.01 of S106 agreements to fund the project outlined above in this report.

33. The strategic director of resources notes the resource implications in paragraph 24 and confirms that the council has received the related funds listed in Table 1 and that they are available for the purposes outlined in this report.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
TfL Bakerloop proposal	TfL, Palestra, 197 Blackfriars Road, London SE1 8NJ	Dermot Hanney Email: dermot.hanney@tfl.gov.uk
Link: New express 'Bakerloop' bus route to begin this autumn - Transport for London		
TfL consultation report	TfL, Palestra, 197 Blackfriars Road, London SE1 8NJ	Dermot Hanney Email: dermot.hanney@tfl.gov.uk
Link: Documents | BL1 – Proposed express bus route between Waterloo and Lewisham town centre | Have Your Say Transport for London		
Old Kent Road bus demand capacity study 2022	Southwark Council 160 Tooley Street London SE1 2QH	Tim Cutts Tel: 020 7525 5380
Link: https://www.southwark.gov.uk/sites/default/files/2024-12/OKRBusStudy080322.pdf		

APPENDICES

No.	Title
None	

AUDIT TRAIL

Lead Officer	Colin Wilson, Assistance Director Strategic Development	
Report Author	Tim Cutts, Head of Regeneration Old Kent Road	
Version	Final	
Dated	27 August 2025	
Key Decision?	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBERS		
Officer Title	**Comments Sought**	**Comments Included**
Assistant Chief Executive – Governance and Assurance	Yes	Yes
Strategic Director of Resources	Yes	Yes
Date final report sent to Constitutional Team		27 August 2025

Agenda Item 11

Meeting Name:	Planning Committee (Major Applications) B
Date:	10 September 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

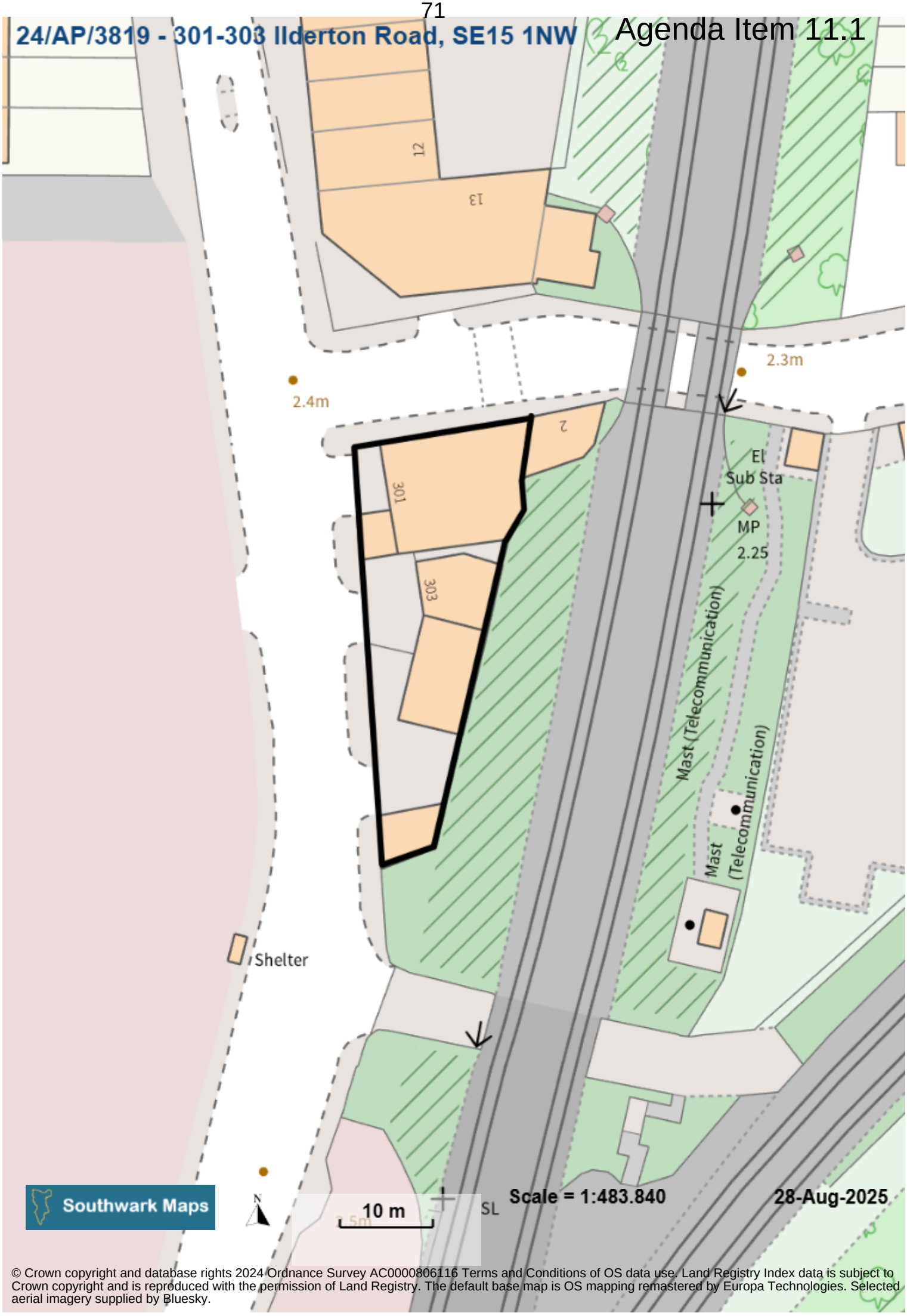
APPENDICES

No.	Title
None	

AUDIT TRAIL

Lead Officer	Chidilim Agada, Head of Constitutional Services	
Report Author	Alex Godinet, Lawyer, Finance and Governance Greg Weaver, Constitutional Officer	
Version	Final	
Dated	14 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		20 August 2025

24/AP/3819 - 301-303 Ilderton Road, SE15 1NW



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Item No.	Classification: Open	Date: 10 September 2025	Meeting Name: Planning Committee (Major Applications) B
Report title:	**Development Management planning application:** Application 24/AP/3819 for: Full Planning Permission **Address:** 301-303 Ilderton Road London Southwark SE15 1NW **Proposal:** Demolition of the existing buildings and construction of a 15-storey building comprising Purpose-Built Student Accommodation (Use Class Sui Generis) and commercial floorspace (Class E(g)), with landscaping, cycle parking and associated ancillary development.		
Ward(s) or groups affected:	Old Kent Road		
From:	Director of Planning and Growth		
Application Start Date 27.02.2025		**Application Expiry Date** 29.09.2025	
Earliest Decision Date 10.04.2025		**Extension of Time End Date** 10.06.2025	

RECOMMENDATIONS

1. That full planning permission be granted for application 24/AP/3819, subject to conditions, referral to the Mayor of London and the applicant entering into a satisfactory legal agreement; and

2. That the planning committee, in making their decision, has due regard to the potential equalities impacts that are outlined in this report; and

3. That, in the event of requirements of paragraph 1 above not having been met by 10 March 2026 the director of planning and growth be authorised to refuse planning permission for application 24/AP/3819, if appropriate, for the reasons set out in paragraph 488 of this report.

EXECUTIVE SUMMARY

4. Located within the Old Kent Road Opportunity Area, the application site comprises a triangular shaped plot at the junction of Ilderton Road and Hornshay Street. The site is occupied by a vacant building which was used to be a car repair centre, and a car wash operating under a short tenancy. The potential of the site to make a contribution to the Council's homes and jobs targets is reflected in the adopted site allocation (NSP70) and the draft

site allocation (OKR16), both of which identify the site as appropriate for delivering new homes. Both of the allocations recognise that some tall buildings will be necessary to deliver these objectives.

5. This application proposes the construction of a 15 storey building with basement to provide 169 student bedspaces and 225 square metres of light industrial floor space, all supported by associated cycle storage and waste/recycling stores



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

6. The application site benefits from extant planning permission under reference 20/AP/3560 for a conventional, homes-led 15-storey scheme. However, this permission has not been implemented, despite the applicant's efforts since 2020 to secure a registered provider for the 16 affordable homes. The lack of interest is attributed to a combination of recent market challenges and site-specific issues, including the limited number of affordable units, the absence of a separate core, and the building's height resulting from the constraints of the relatively small and triangular plot.

7. The proposed 169-bedspace PBSA, which would be entirely direct-let (i.e. not linked to any specific university or college) at market rate, would not include any affordable student rooms. Instead, the application proposes to

prioritise the delivery of general needs affordable housing in the borough, which would be provided in the form of a payment-in-lieu of £7,689,500 **(**index-linked), because it is not practical to include on-site conventional housing alongside a feasible amount of student housing on this relatively small and triangular site. This payment-in-lieu is equivalent to 35% affordable housing by habitable room which the Council's expert assessor has deemed to be reasonable. The applicant has also demonstrated that reasonable efforts were made to secure off-site provision of conventional affordable housing on nearby sites; however, no interest was received from the respective landowners. The payment-in-lieu could potentially be used to directly support the delivery of affordable housing in the Council's site(s) thereby bringing tangible benefits for the local community. This is considered to be a benefit of the application. While the proposal in this application 24/AP/3819 without any on-site conventional affordable homes is inherently less likely to contribute to a mixed and inclusive neighbourhood than it might otherwise, the impact would not be substantial enough to outweigh the benefits of using brownfield land for meeting identified housing needs via on-site delivery of student homes and a payment-in-lieu, and indirectly through release local family housing

8. The application site is situated in a location where tall buildings are considered appropriate, subject to demonstration that they would achieve an exemplary standard of design and meet the requirements of the London Plan and Southwark Plan in all other regards. While the scheme proposed by 24/AP/3819 would be of a different use and architectural design to the extant scheme, it would be no taller. Furthermore, the footprint of each storey would not, be larger than the counterpart storeys in the extant scheme. The building envelope established by 20/AP/3560 is a material consideration in the determination of planning application 20/AP/3560. The proposal also would not cause unacceptable harm to the amenity of the neighbouring properties or townscape.



***Image 2** (above): Visualisation looking north from Ilderton Road*

9. 225 square metres of light industrial floorspace is proposed to re-provide the existing employment floorspace. The two proposed ground floor light industrial units will have individual entrances fronting Ilderton Road, providing an active frontage onto the street. Whilst affordable workspace is not required given the overall proposed commercial floorspace, 10% of the proposed light industrial floorspace will be affordable workspace, which is welcome.

10. There is a housing phasing plan for the Old Kent Road to ensure public transport capacity matches development capacity, with the first 9,500 homes to be delivered in Phase 1 in advance of the signing of the construction contract for the Bakerloo Line Extension (BLE). Given the extant permission 20/AP/3560, the development in this application remains in Phase 1.

11. As the report explains, the proposal would make efficient use of an under-utilised site to deliver a high quality and sustainable development that on balance accords with the Council's aspirations for the area. In addition to the economic benefits brought by this proposal, such as the employment generating uses and the construction-related jobs and training, a range of financial contributions will be secured to offset the impacts of the development and assist with local and London-wide infrastructural investment.

PLANNING SUMMARY TABLES

12.

Direct Let Student Housing

Studio (no. of rooms)	Twodio (no.of rooms)	Wheelchair Accessible M4(3) (no.of rooms)	Total (no.of rooms)
130	26	13	169

13.

Commercial

Use class and description	Existing GIA	Proposed GIA	Change +/-
E [a] to (f) (Retail/dining/services)	0	0	N/A
E [g] *i)* (Office)	0	0	N/A
E [g] *ii)* (Research and development)	0	0	N/A
E [g] *iii)* (Light industrial)	0	+225.5	+225.5
E [g] *iii)* (Affordable workspace)	0	22.5*****	N/A
B2 (Industrial)	225	225	-225
B8 (Storage/Distribution)	0	0	N/A
C1 (Hotel)	0	0	N/A
Sui Generis (PBSA)	0	5,841	+5,841
Employment	**Existing no.**	**Proposed no.**	**Change +/-**

	o.		
Operational jobs (FTE)	0	25	+25

14. **Parks and child play space**

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

15. **Carbon Savings and Trees**

Criterion	Details		
CO2 Savings	37% improvement on Part L of Building Regs 2021		
Trees Lost	0 x Category A	0 x Category B	0 x Category C
Trees Gained	0		

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

Criterion	Existing	Proposed	Change +/-
Urban Greening Factor	0	0.33	+0.3
Run Off Rate	2.75 l/s	2 l/s	-0.75 l/s
Green/Brown Roof Coverage	0	226 sq.m	+ 226 sq.m
Electric Vehicle Charging Points	0	0	N/A
Blue Badge Parking Spaces	0	0	N/A
Cycle Parking Spaces	0	192	+192

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

Criterion	Total Contribution
CIL (estimated)	£899,717.40
MCIL (estimated)	£432,801.45
Section 106 Contribution	As per the ‘Planning obligations’ section of this report

BACKGROUND INFORMATION

Site details

Location and description

18. The application site comprises an area of 0.057 hectares (ha) and is triangular in its form, owing to its containment by Ilderton Road to the west, Hornshay Street to the north and the raised embankment of the South London Railway line to the east. To the rear of the site and railway line is the boundary of Lewisham Borough Council.

19. The site had previously accommodated two uses; a car repair use (B2 class use) within a single storey brick building with hipped roof and a car wash (Sui Generis use class) took place within an open yard and associated temporary structures. The motor vehicle repair centre vacated in 2022, but the Hand Car Wash remains



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

20. Metal fencing currently runs around the periphery of the application site along Ilderton Road with the single storey building and a brick wall directly back onto Hornshay Street. There are currently two accesses to the Site directly from Ilderton Road.

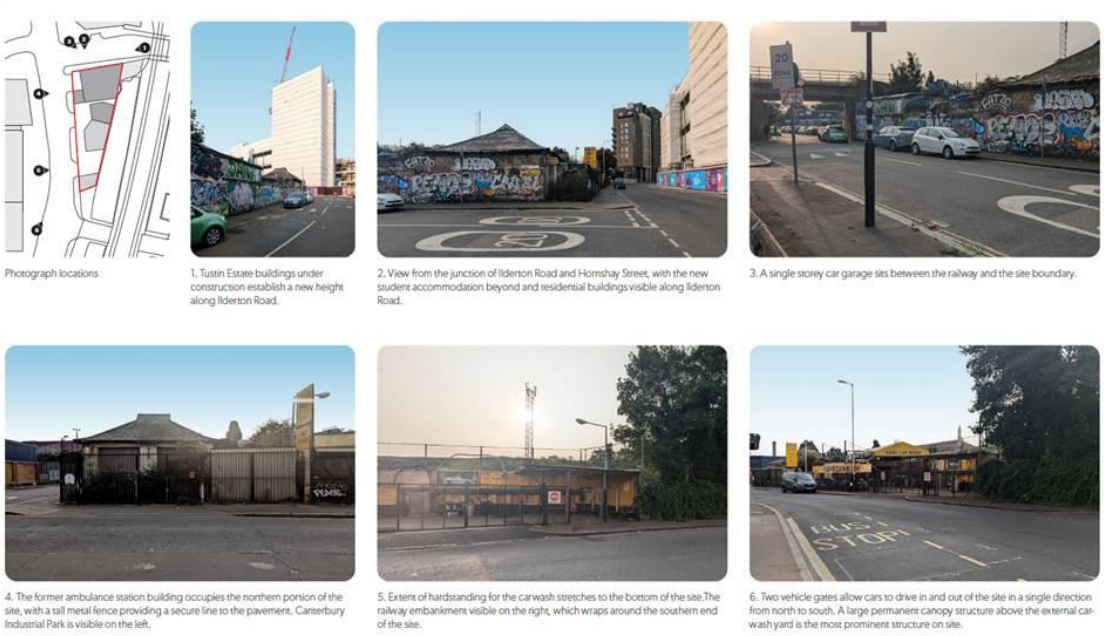


Image 4 (above): Photographs of the existing site (numbered 1 to 6, clockwise from top left) with the viewpoints annotated on the map (top left).

Surroundings

21. The surrounding area is a mix of residential estates to the west and east and industrial/quasi retail uses extending along the route of Ilderton Road to the north and south.

22. Canterbury Industrial Estate is located to the north of the site on the opposite side of Hornshay Street and contains several single storey light industrial units.

23. Immediately adjoining the site to the east is vehicle repair use at No. 2 Hornshay Street.

24. Previously set back from Ilderton Road to the west is the post-war Tustin Estate which is undergoing a phased estate renewal for 690 homes within 20 buildings ranging in heights from 2 to 21 storeys (references: 22/AP/1221, 23/AP/3241 and 24/AP/2526). In Phase 1 which is near completion, Block G1, which is part 7 and part 13 residential storeys, sits directly opposite the site, while taller residential towers of 20 storeys are located to the southwest of the application site.

25. Beyond the railway embankment to the east (on the opposite side of the railway line) is the Wheelshunters Social Club, which is part single and part two storeys in height with residential uses extending beyond falling within the borough of Lewisham.

26. Both sides of Ilderton Road continues to be subject to substantial change. There are a series of planned tall building clusters coming forward within the Opportunity Area, particularly those on the eastern side of the Ilderton Road.

These development clusters are aligned with the tall building strategy set out in the Old Kent Road Area Action Plan (hereafter referred to as the draft OKR AAP) which seeks to distribute taller buildings on the eastern side of Ilderton Road. These taller buildings will be spaced out along the length of Ilderton Road and would be set back from Ilderton Road adjacent to the viaduct. The tallest buildings will be of a similar height to the existing towers on the Tustin estate.

Designations

27. The following policy, socioeconomic and environmental designations apply to the application site:

- Site Allocation NSP70 (Hatcham Road, Penarth Street and Ilderton Road);
- Old Kent Road Area Vision AV13;
- Old Kent Road Opportunity Area;
- Old Kent Road Strategic Cultural Area;
- Old Kent Road Action Area;
- Old Kent Road Action Area Core;
- the Urban Zone;
- Hot Food Takeaway Primary School Exclusion Zone;
- Flood Zone 3 (in an area benefitting from flood defences);
- East Southwark Critical Drainage Area;
- the Air Quality Management Area;
- “East Central” Multi-Ward Forum Area; and
- Community Infrastructure Levy Charging Zone 2.

28. The application site sits within the Core Area of the draft Old Kent Road AAP. More specifically it sits within Sub-Area 4, ‘Hatcham, Ilderton and Old Kent Road (South)’. Within this Sub-Area, the application site forms part of the OKR 16 parcel, ‘Hatcham Road and Ilderton Road’, which covers 7.9 hectares of land and has an indicative capacity of 2,200 new homes and 2,698 additional jobs. The majority of the OKR 16 parcel is designated as a Locally Significant Industrial Sites within the draft OKR AAP and/or the Southwark Plan, and the application site falls outside of the Locally Significant Industrial Sites.

29. With regard to heritage designations, the site does not include any listed structures and is not in a conservation area.

30. The site is within the 'North Southwark and Roman Roads' Tier 1 Archaeological Priority Area.

31. With respect to strategic and borough views, the site is not within any of the Borough or London View Management Framework (including the wider corridors settings and the background regions) views. The site does fall within the extended cone of the background wider setting consultation area of LVMF Townscape View 2A.1, from Parliament Hill summit to St Paul's

Cathedral. The site sits approximately 2.1 kilometre beyond the 2A.1 Wider Setting Consultation Area of this view

32. There is no existing public space or trees within the application site. The nearest public green spaces are (in order of proximity):

- Bridgehouse Meadows located 200 metres (a 3 minute walk) to the east of the site;
- Pat Hickson Park located 430 metres (a 6 minute walk) to the north of the site, at the junction of Ilderton Road and Stockholm Road;
- Brimmington Park located 380 metres (a 6 minute walk) to the south of the site; and
- The 63 acre Southwark Park located approximately 1.25 kilometre (a 21 minute walk) to the north of the site

33. Immediately to the east of the site is the South Bermondsey Railway Embankments Site of Importance for Nature Conservation (SINC) which is located in Lewisham.

34. With regard to transport connectivity, the current PTAL rating of the site is 3, which indicates an average accessibility to public transport.

35. South Bermondsey Overground is the nearest railway station, located approximately 1.1 kilometres to the north (a 15 min walk). It offers connections towards London Bridge, West Croydon and Beckenham Junction. The nearest underground station is Queen Road Peckham, approximately 1.1 kilometres to the south (a 15 min walk). As part of New Bermondsey masterplan, a station is proposed on the Overground (east London) line, in-between Surrey Quays and Queens Road Peckham stations; the entrance to the new station would be on Surrey Quays Road approximately 600 metres northeast of the application site in Lewisham.

36. A northbound bus stop is located on the opposite side of the application site, and a southbound bus stop is located further south of the application site. The P12 bus provides a regular service along Ilderton Road, connecting to Camberwell and Surrey Quays. There also four different bus routes available from nearby Rotherhithe New Road / Galleywall Road, which provide connections to central London and Peckham. The pedestrian routes around the application site provide easy access to the bus stops and train stations

37. With regard to local cycling infrastructure, Cycle Future Route 12 (CFR12) will connect Rotherhithe and Peckham. As part of this route, a two-way cycle lane will be located on the opposite side of Ilderton Road, with a new crossing at the north-west corner of the site. The route will then continue along Hornsey Street, running along the northern boundary of the site. This section is expected to be completed in 2025 and will significantly enhance cycle connectivity to and from the site once delivered.

38. The nearest short-stay cycle storage facilities are on the Old Kent Road approximately 240 metres to the south of the site at the entrance to Brimmington Park. These facilities comprise a 4 Sheffield stand (8 spaces).

39. With respect to parking and servicing infrastructure locally, there are:

- four Blue Badge parking spaces nearby (on Verney Road and Varcoe Road within Bramcote Estate and at distances of no more than 600 metres from the application site);
- opportunities for ad hoc on-street parking within Bramcote Estate;
- four Car Clubs, as follows:
    - Zipcar on Verney Road, 700 metres away (a 15 minute walk);
    - Zipcar on Lynton Road, 700 metres away (a 15 minute walk);
    - Zipcar Club on Raymouth Road, 800 metres away (a 17 minute walk);
- one loading bay (accommodating up to four small vehicles) on Penarth Street, approximately 600 metres northwest of the site.

40. The site is within the Old Kent Road Controlled Parking Zone (CPZ).

41. The highways of Ilderton Road and Hornshay Street (western section) are part of the borough network. All these highways are also subject to a Local Development Order (LDO), approved by Southwark Cabinet on 13 June 2023. The LDO permits the construction of an underground network of 7 kilometres of insulated pipes to carry heat from the South-East London Combined Heat and Power (SELCHP) facility in South Bermondsey to properties around Old Kent Road and Peckham for the purposes of supplying heating and hot water.

Details of proposal

42. This application seeks full planning permission for comprehensive mixed-use redevelopment of the site to provide Purpose-Built Student Accommodation (Use Class Sui Generis) and commercial floorspace (Class E(g)), with landscaping, cycle parking and associated ancillary development.

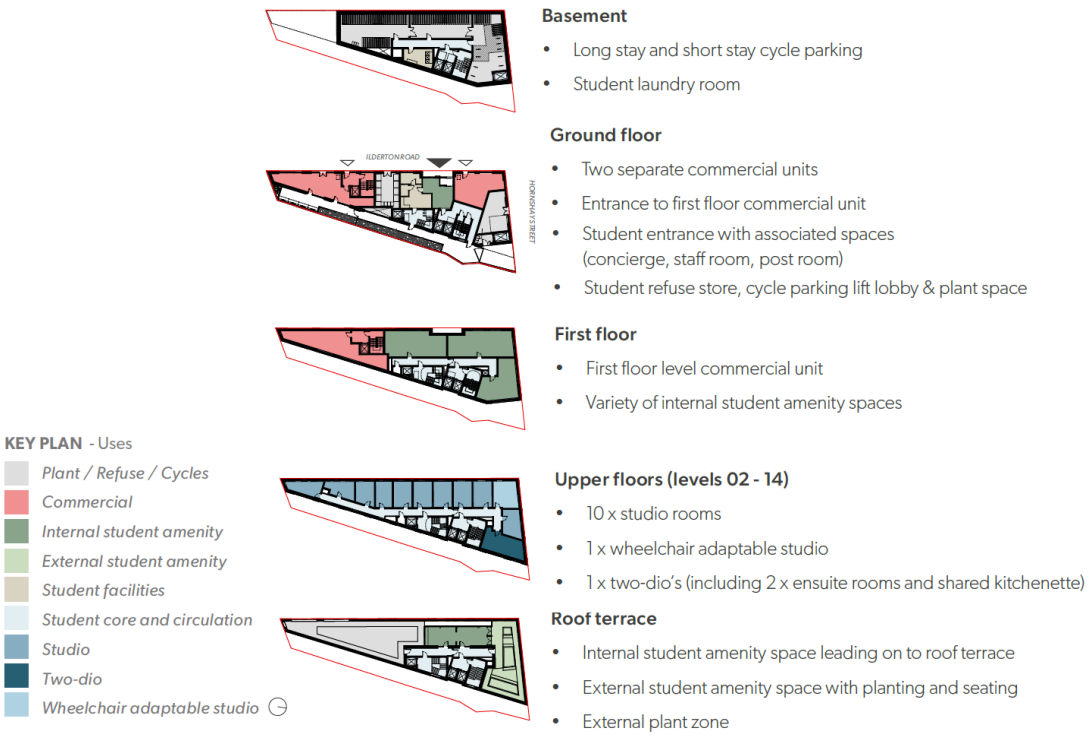


***Image 5**: Typical floor plate divisions*

43. The building will front Ilderton Road comprising a height of 15 storeys (AOD+56.385 m to the top of the lift overrun).

44. The ground floor of the proposed building will accommodate the entrance to the PBSA, which leads to a concierge/staff room, an accessible toilet, and a post room, along with separate entrances to the commercial units—two on the ground floor and one on the first floor. The basement will provide cycle storage and a student laundry room. External Sheffield stands within the service yard to the rear will be for the occupiers of the light industrial units. On the first floor and roof terrace, a range of communal amenity spaces is proposed, which could potentially include a gym, study area, games lounge, TV lounge, private dining room, and a tea/coffee station. These internal communal amenity spaces would amount to 207.8 square metres in total, equating to an average of 1.23 square metres per student. Outdoor amenity would also be provided in the form of a terrace amounting to 60.9 square metres. The upper floors would comprise 11 x studio bedrooms and 1 x 'Two-dio' units which two ensuite rooms served by shared living/kitchen/dining facilities on each floor The internal spaces would be given over to ancillary mechanical, electrical and other plant requirements to serve the proposed development.

45. The 169 PBSA units are all to be direct-let (i.e. A nominations agreement whereby all or some of the rooms would be operated directly by a higher education provider has not been agreed) Instead, it is expected that the scheme would be managed by the applicant or by an established PBSA accommodation manager. The units will be tied to occupation by Students and secured within the S106 Agreement.



Image 6 *(clockwise from top left): Aerial view of the proposal from the south; crown treatment; base treatment;*

46. The proposed development is car free. A service yard is proposed at the rear of the site with new access through Hornshay Street and gates setting back 6m from the nearest kerb.

Comparison of this application proposal with the extant permission

47. The below table compares the key aspects of the 20/AP/3560 extant consent against the application proposal

Table 1: Comparison of the extant scheme 20/AP3560 and this application 24/AP/3819		
	Extant scheme 20/AP/3560	**This application 24/AP/3819**
Non-residential	450 sq.m GIA (an uplift of 225 sq.m on the existing)	225 sq.m GIA (No change from the existing)
Housing	59 dwellings, comprising • 7 x studios • 22 x 1-beds • 18 x 2-beds • 12 x 3-beds	169 student bedspaces
Height	56.5 metres AOD	56.385 metres AOD

Massing/form	15 storeys	15 storeys
Basement	No	Yes
Affordable housing	16 units (35.5% of all habitable rooms) - of the 12 units would be Social Rent and 4 units would be Intermediate	An affordable housing payment in lieu of £7,689,500 (35% of all habitable rooms)



Extant scheme 20/AP/3560



This application 24/AP/3819

***Image 7**: Comparison of the street view of the Extant scheme 20/AP/3560 This application 24/AP/3819*

Planning history of the application site and nearby sites

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

Mid-application amendments

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

50. With respect to building and landscape design, changes and additional information included:

- Reinstated the positive features from the extant scheme 20/AP/3560 such as arches and double height floor to ceiling heights at lower levels;
- Omitted the horizontal banding that breaks the vertical piers;

- Bay studies of the window design and façade treatment have been provided to demonstrate the quality of the design in terms of the depth of design features, window reveals, soffit treatments;
- High level details of ventilation and drainage strategies have been outlined, to ensure they are appropriately integrated into the design of the bays, to avoid vents;
- Use of glazed sawtooth bricks including burgundy colour in limited areas at the southern thinner corner, providing added interest from the approach along Ilderton Road;
- Refined the crown of the building; and
- Opened up the PBSA lobby entrance at the base of the building

51. With respect to energy and sustainability matters, changes to the energy strategy included:

- Improved building fabrics with a lower U-value for walls and external doors;
- Increased the solar output from 11.25 kWp to 17.2 kWp; and
- Use of mechanical ventilation with heat recovery system with higher efficiency.

52. With respect to transport and highways, changes included:

- changes to the cycle storage proposals, including replacement of folding bicycle locker to standard cycle parking, adjustments to the overall number and typological split of long-stay stands, as well as the layouts of the cycle store rooms;
- changes to the bin store arrangements;
- additional swept path analysis based on the latest Cycle Future Route 12 (CFR12) design

53. The applicant also supplied a small number of supplementary and revised reports to provide clarifications and corrections with regard to various issues raised by consultees and officers. Other matters resolved during the course of the planning application process included commitments to certain planning obligations and other mitigation.

54. The subsequent minor amendments did not necessitate any public consultation. This is because the changes did not:

- result in any enlargement to the buildings' scale; or
- worsen any of the amenity or environmental impacts produced by the original scheme, or result in the creation of any new ones; or
- remove, reduce or vary the mitigation originally proposed; or
- engage any other issues potentially of wider public concern.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

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

- Consultation responses from members of the public and local groups;
- Principle of the proposed development in terms of land use;
- Impact of proposal on development potential of nearby land
- Development viability;
- Dwelling size mix;
- Quality of residential accommodation – PBSA;
- External amenity space;
- Amenity impacts on nearby residential occupiers and surrounding area;
- Design;
- Public realm, landscaping and trees;
- Green infrastructure, ecology and biodiversity;
- Archaeology;
- Transport and highways
- Environmental matters;
- Energy and sustainability;
- Communications and aviation;
- Socio-economic impacts
- Planning obligations;
- Mayoral and Borough Community Infrastructure Levies;
- Community engagement;
- Consultation responses; and
- Community impacts, equalities and human rights.

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

Legal context

57. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. In this instance the development plan comprises the London Plan 2021, the Southwark Plan 2022 and the draft Old Kent Road Area Action Plan 2024. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires decision-makers determining planning applications to pay special regard to the desirability of preserving listed buildings and their setting or any features of special architectural or historic interest which they possess.

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

Adopted planning policy

59. The statutory development plan for the borough comprises the London Plan 2021 and the Southwark Plan 2022. The National Planning Policy Framework 2024 is a material consideration but not part of the statutory development plan. A list of policies which are relevant to this application is provided at Appendix 2. Any policies which are particularly relevant to the consideration of this application are highlighted in the report.

ASSESSMENT

Consultation responses from members of the public and local groups

60. Consultation with members of the public was first conducted between March and April 2025. Letters were sent to local residents, the application was advertised in the local press and site notices were displayed. No comments were received. The table below summarises the number of representations received during this period:

Table 2: Consultation: Summary table	
Total number of respondents: **0**	Total number of responses: **0**

The split of views between the 2 respondents was:

In objection: **0** Neutral: **0** In support: **0**

Principle of the proposed development in terms of land use

Relevant policy designations

Overarching strategic policy objectives

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

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

- promote the strength and potential of the wider city region;
- ensure that London continues to provide leadership in innovation, research, policy and ideas, supporting its role as an international incubator and centre for learning;
- provide sufficient high-quality and affordable housing, as well as physical and social infrastructure;
- help London's economy to diversify; and
- plan for sufficient employment space in the right locations to support economic development and regeneration.

Old Kent Road Opportunity Area

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

64. London Plan Policy SD1 encourages opportunity areas to:

- optimise residential and non-residential output;
- optimise density; and
- contribute towards meeting (or where appropriate) exceeding the minimum guidelines for housing and/or indicative estimates for employment capacity.

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

- deliver direct benefits to the existing community including new and improved homes including new council homes, schools, parks, leisure and health centres, and the creation of jobs;

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

66. The Old Kent Road Area Vision also states that the OKR AAP will set out the physical framework for enabling the community to realise its potential. The Council is in the process of preparing this AAP which proposes significant transformation of the Old Kent Road area over the next 20 years, including the extension of the Bakerloo Line with new stations along the Old Kent Road towards New Cross and Lewisham. The submission draft of the OKR AAP underwent Regulation 19 consultation between 28 February 2025 and 11 April 2025. As of the date of this Committee report, the Local Planning Authority is in the processing of preparing responses to all representations received during the course of the Regulation 19 consultation, with a view to undergoing Examination in Public in the second half of 2025. As the document is still in draft form, it can only be attributed limited weight.

67. The London Plan specifically recognises the value of the proposed Bakerloo Line extension from Elephant and Castle to Lewisham and beyond, which would increase the connectivity and resilience of the Old Kent Road Opportunity Area while also reducing journey times to key destinations.

Southwark Plan Site Allocation

68. The Southwark Plan 2022 includes a site allocation, NSP70 ‘Hatcham Road and Penarth Street and Ilderton Road’ which the application occupies approximately 0.85% of NSP70 states that redevelopment of the site must:

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

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

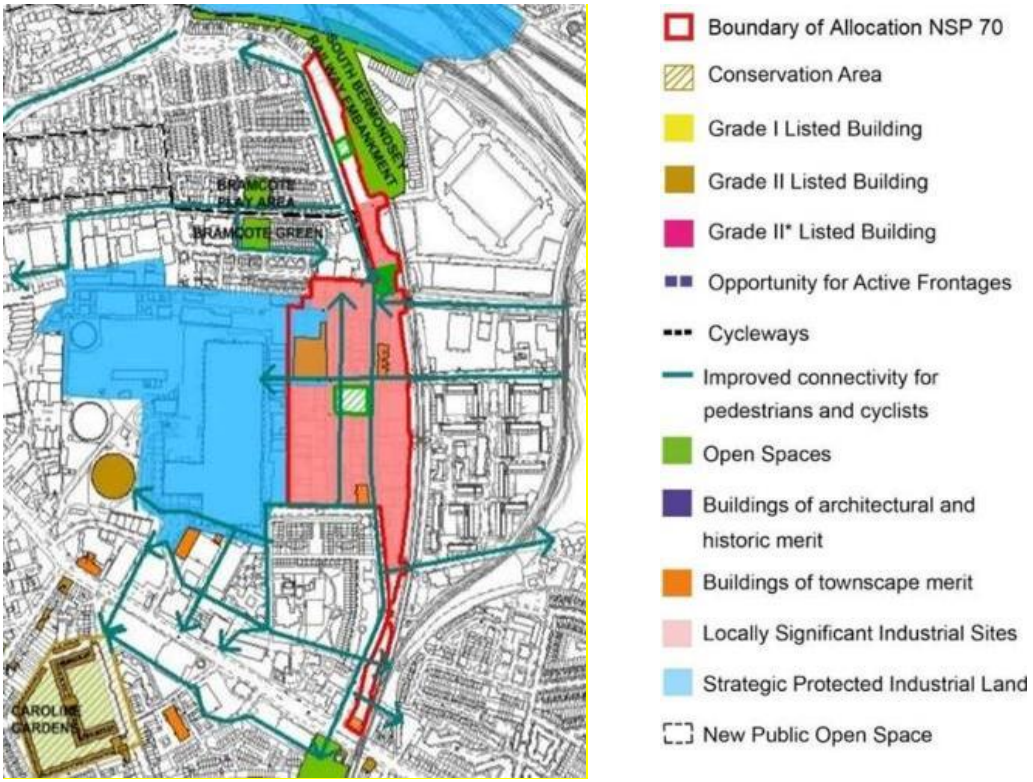


Image 8: Site allocation NSP70 'Hatcham Road and Penarth Street and Illderton Road' as depicted in the Southwark Plan 2022.

Draft OKR AAP Site Allocation

70. The application site is located within the OKR 16 parcel of the draft AAP. This parcel, for which the draft AAP sets out a future growth vision, has a boundary very similar that of Southwark Plan Site Allocation NSP70. Elements of the OKR 16 vision that are relevant to the 301-303 Ilderton Road site are:

- depot and industrial uses will be brought forward on land on the east side of Ilderton Road, where appropriate within mixed use development that provides new homes;
- new homes will be delivered to help create a vibrant new neighbourhood in which people can live and work; and
- the thriving creative business community will continue to represent the identity of the area

71. The draft AAP sets out some 'must' deliverables of redevelopment within OKR 16. Those applicable to the application site are:

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

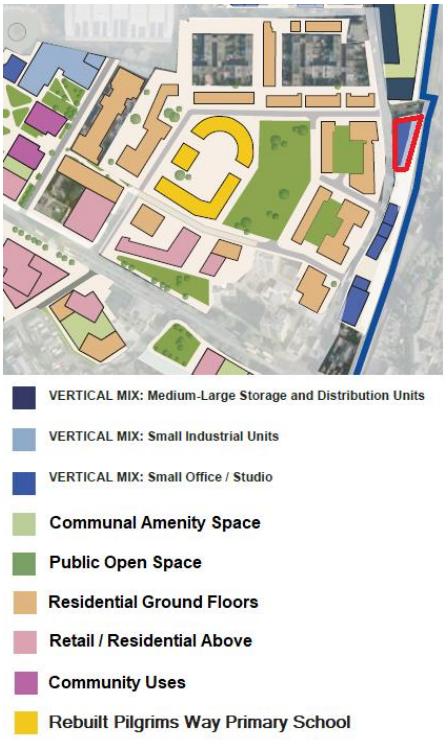


Image 9: (right): Figure SA4.3 of the draft AAP, 'Building Typologies and Land Uses', cropped to the application site (edged in red).

72. The draft AAP advises that redevelopment within OKR 16 may provide retail, community and education uses.

73. The draft APP goes on to advise that buildings in OKR 16 should be designed to reflect the area's robust and functional industrious character

74. There are 499 conventional homes either built or under construction within this site allocation and 250 student rooms completed. Several planning schemes for OKR16 have been granted planning permission or are to be granted subject to S106 agreement, which will deliver a further 410 conventional family homes, 1,148 co-living units, 477 student beds and 9,429 square metres commercial floorspace (See Table 5 below).

75. In total 909 conventional homes, 1,148 co-living units and 727 student bedspaces have been consented or authorised in this site allocation against a total site allocation of 2,200 homes. For the purposes of calculating a conventional residential equivalent in the Old Kent Road housing phasing plan 3 student rooms or 3 co living rooms are the same as single conventional home. So in total 1,534 conventional residential equivalent homes are consented or authorised which equates to about 70% of the capacity of this site allocation. The consented or authorised 606 conventional affordable home are about 39.5% of the conventional residential equivalent homes (See Table 5 below).

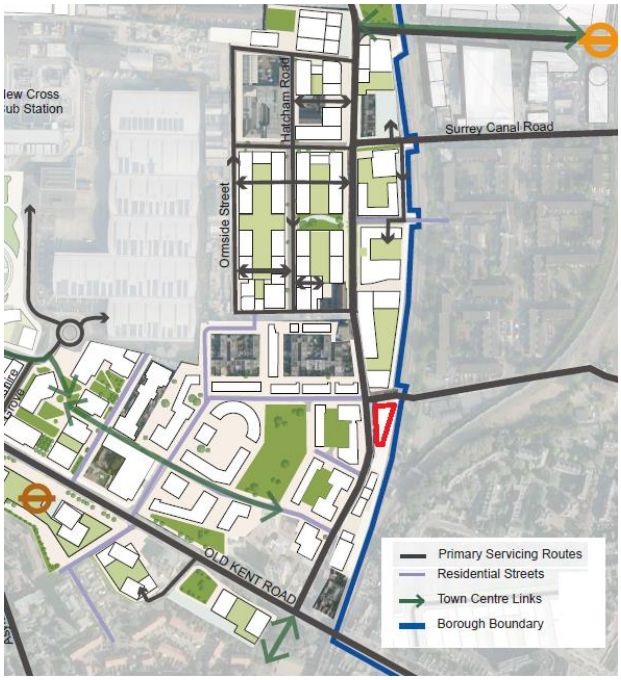
76. The OKR 16 vision also sets out the design of buildings in this site allocation should reflect its robust and functional industrious character.

77. The draft AAP also includes a strategy with regard to building heights in OKR16, the key elements of which are:

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

78. The servicing and road network strategy for OKR16 says Ilderton Road and Hornshay Street will be retained as two way working and are primary servicing routes.

Image 10: (right): Figure SA4.4 of the draft AAP, 'Building Typologies and Land Uses', cropped to the application site (edged in red).



Hatcham and Ilderton Roads Design Code

79. The site is also subject to the Hatcham and Ilderton Roads Design Code, which sets targets and aspirations applicable to all new development within the area. The Code, which was prepared in accordance with the baseline standard of quality and practice set out in The National Model Design Code, is a continuation of the draft AAP, setting out in a greater level of detail the key design principles that developers will be expected to follow in order to gain planning permission. Although it is not intended to be absolutely prescriptive, the Code defines the parameters within which developments will be expected to come forward more tightly than the draft AAP. The Design Code for OKR16 will be adopted as a Supplementary Planning Document (SPD) to the adopted AAP.

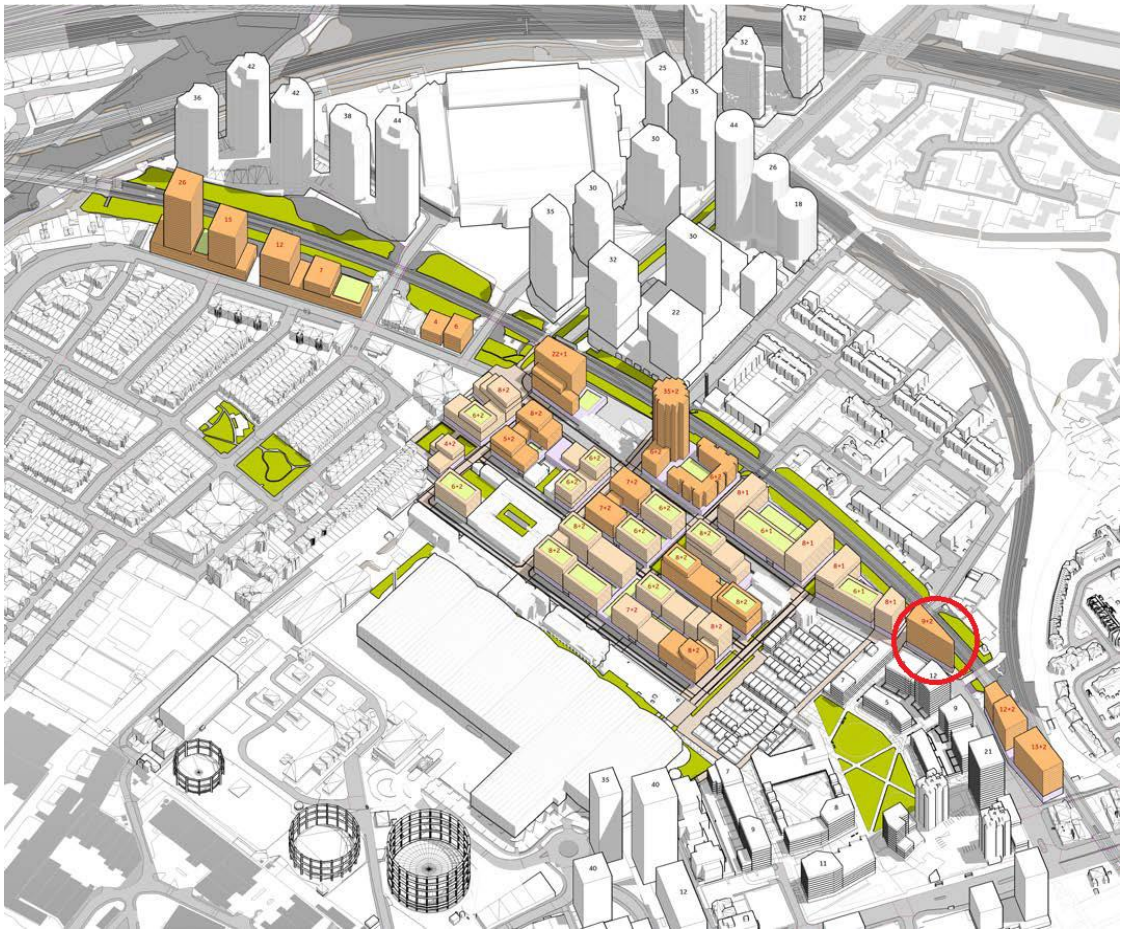


Image 11: *Excerpts from the Hatcham and Ilderton Roads Design Code setting out built form across the study area, showing the application site circled in red.*

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

<u>Conclusion on policy designations, including response to the site allocations</u>

81. The overarching thrust of polices within the Development Plan is to optimise and make effective use of land. The site is a long-standing underutilised collection of land parcels and low-rise buildings, presenting a clear opportunity for optimisation.

82. In land use terms, the principle of redeveloping the application site for a mixed use development, including a mix of Purpose-Built Student Housing (Use Class Sui Generis), providing it meets the requirements of Policy P5 of the Southwark Plan and policy AAP 4 “Student Homes” of the draft OKR AAP (which is discussed in more detail below) and light Industrial units (Use Class E(g)(iii)) is on balance acceptable as it would bring into productive use this underutilised inner London site. The proposed mix and quantum of uses, subject to meeting the requirements of Southwark Plan Policy P5 and Policy AAP4 of the draft OKR AAP would on balance support the role, functions and ambitions of the Opportunity Area and meet the expectations of the two site

allocations, NSP70 of the Southwark Plan 2022 and OKR 16 of the draft OKR AAP.

83. The acceptability of each of the individual uses is considered below.

Higher education and associated uses

Policy background

84. The London Plan sets out the strategic vision for the higher education sector. Policy S3, which is concerned with education facilities, acknowledges that universities play a vital part in ensuring Londoners have the higher order skills necessary to succeed in a changing economy, and for the capital to remain globally competitive. Under Part B of the policy is a set of criteria that development proposals for education facilities should meet, including:

- being located in areas of identified need;
- being in locations with good public transport accessibility; and
- fostering an inclusive design approach.

85. Paragraph 5.3.8 of the supporting text to Policy S3 states:

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

86. London Plan Policy E8 states that London's higher and further education providers, and their development across all parts of the city, are to be promoted. Their integration into regeneration and development opportunities to support social mobility and the growth of emerging sectors should be encouraged. The supporting text endorses measures to secure and develop London's leading role as a centre of higher and further education of national and international importance.

87. Southwark Plan Policy P27 says that development for higher and further education facilities will be permitted where they meet identified needs.

Assessment

88. Southwark is home to Kings College London, the University of the Arts, and London South Bank University, representing some of the largest universities in London. There are also a number of noteworthy higher education providers in adjacent boroughs such as Lewisham, which is home to Goldsmiths, the latter being easily accessible via the Old Kent Road transport corridor. The draft OKR AAP seeks to bring a university and other higher and further education facilities to the area. Benefiting from future transport improvements which would result in high transport accessibility and good links to the aforementioned higher education institutions, the application site's proximity to the Old Kent Road South District Town Centre (400m) makes it appropriate for education-related uses.

89. The student housing proposed by this planning application would meet an identified need within Southwark for higher education related facilities, while also supporting the Opportunity Area to progress towards becoming a centre of excellence for education. It would also form an integrated part of a mixed-use redevelopment. Therefore, in principle the proposed student housing land use aligns with the requirements of London Plan Policies S3 and E8, as well as Southwark Plan Policy P27, providing that it contributes to the creation of a mixed and inclusive neighbourhood.

90. As student accommodation is a type of housing, the acceptability of the proposed PBSA as part of the planning application's overall residential offer is considered within the following 'Housing' assessment. Other related considerations, such as the quality and management of the accommodation, and how transport impacts would be mitigated, are assessed in the relevant later parts of this report.

Housing

Policy background

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

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

93. At the local level, the Southwark Plan and draft OKR AAP reiterate the targets established by the London Plan. Policy ST1 'Development targets' of

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

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

Assessment

Principle of housing

95. By delivering 169 PBSA bedspaces, this planning application would contribute to realising the housing delivery targets for the Opportunity Area, in line with London Plan Policy SD1, while also increasing London's housing supply, in accordance London Plan Policy H1.

96. The proposed housing units are lent further support by the Southwark Plan and the draft AAP, which promote residential uses on the application site in the quantum proposed, subject to the provision of affordable housing preferably on site or if not possible to provide onsite through the provision of a payment in lieu (PIL). In this instance a PIL is proposed. The proposed housing would be entirely student homes, rather than a mix of conventional affordable housing and student homes and so would contribute to the creation of a less mixed and inclusive neighbourhood than would otherwise be the case. Nonetheless the scheme does include other non-residential uses including light industrial units in a well-connected inner London location, all of which contribute to the delivery of other plan aspirations, as would the payment of the PIL.

97. Appropriate design mitigation is provided in the residential element to ensure the industrial and related activities on-site and in surrounding parts of the Locally Significant Industrial Sites are not compromised in terms of their continued efficient function, access, service arrangements and days/hours of operation noting that many businesses have 7-day/24-hour access and operational requirements. The main design features include:

- separate entrances for the PBSA and the commercial units (See also 'Design' section);
- adequate noise mitigation measures of the habitable spaces within PBSA including appropriate glazing and partition specification and use of Mechanical Ventilation with Heat Recovery (MVHR) (See also 'Quality of Residential Accommodation' section); and
- off-street delivery and servicing arrangement (See also 'Delivery and Servicing' section)

98. Having regard to all of the above, and considering the conventional private and affordable housing which is being delivered within the wider site allocation all of which contributes to the creation of a mixed and inclusive neighbourhood (See paragraphs 148 – 160 below), the provision of residential floorspace, in form of PBSA with a PIL in respect of affordable housing , is on balance considered to be acceptable on this site. This is subject to the PBSA meeting the relevant policies concerned with unit sizes, quality of accommodation, management arrangements and standards of amenity. These matters are discussed in later sections of this report.

Contribution towards borough housing targets

99. Through its assessment of the deliverable housing sites in the borough, the Council can demonstrate a five year supply of housing land, plus the necessary 20% buffer required by the housing delivery test. As the application site forms part of an identified 'allocation' in the Southwark Plan, its redevelopment for housing has been anticipated by the borough-wide assessment of deliverable housing sites. The borough-wide assessment attributed an indicative capacity of 2,200 new homes to the NSP70 allocation.

100. Although student housing is classified as non self-contained accommodation and a Sui Generis use in the Use Classes Order, it is considered as 'housing' for monitoring purposes through the Council's and GLA's monitoring reports. With 169 student rooms proposed, the proposed development would contribute the equivalent of 56 (rounded) homes towards meeting the Council's housing targets. It would also reduce pressure on the local private rented market, in that it would release back to the private rented sector 56 single dwellings that would otherwise be in student occupation.

101. Aside from the contribution it would make towards the strategic housing targets set out in the Southwark and London Plans, the proposed PBSA would also assist in delivering off-site conventional (Class C3) housing, thus making a further contribution towards the targets. This is because the affordable housing payment in lieu is intrinsically linked to the delivery of the PBSA direct-let bedspaces.

102. The proposed PBSA bedspaces would deliver the equivalent of 56 homes. This directly equates to 2.4% of the borough's 2,355 home annual target and contributes indirectly towards the delivery of affordable homes elsewhere in the borough through the payment in lieu. Nonetheless as set out in the London Plan and draft OKR AAP, student housing should also contribute to a mixed and inclusive neighbourhoods as well as overall housing targets. As set out above, on balance this scheme is on balance considered to achieve that aim. In that context, the contribution the proposal would make to the Borough's housing delivery targets is acknowledged, albeit the lack of affordable housing on the site is disappointing given the great need for such provision.

Old Kent Road Housing Phasing Plan

103. The Greater London Authority (GLA) and Transport for London (TfL) officers have worked closely with Southwark Council officers to agree the broad geography and phasing of development across the area covered by the draft AAP, to help provide certainty to communities, local businesses and developers in advance of the Bakerloo Line Extension (BLE) and a clear timetable for its delivery.

104. As part of the collaborative process outlined above, and as per AV.13 'Old Kent Road Area Vision' of the draft AAP, a Housing Delivery Plan has been introduced. This comprises two consecutive phases, Phase 1 and Phase 2, each with their own housing number limit. For Phase 1, the cap is 9,500 net additional homes. Any scheme granted permission after the cap has been met would fall into Phase 2, and be subject to a Grampian agreement linked to BLE delivery. Phase 2 schemes will only be eligible for implementation once a BLE construction contract is in place. In respect of the OKR Housing Delivery Plan an agreed 3:1 conversion rate is applied in respect of PBSA schemes, where three PBSA units equate to one conventional (Class C3) dwelling.

105. In the wider context of extant planning permissions and live planning applications across the Old Kent Road Opportunity Area including those with resolution to grant planning permission but are pending completion of a legal agreement bring the total number of homes within Phase 1 to 9,208 dwellings including the extant permission of the site for 59 dwellings 20/AP/3560.

106. Planning application 24/AP/3819 puts forward an alternative form of development for the site, which applying the 3:1 conversion rate agreed with TfL would deliver the equivalent of 56 dwellings. This represents a reduction of 3 homes on the extant planning permission 20/AP/3560.

107. In the event of a resolution to grant permission for the 24/AP/3819 proposal, the Section 106 Agreement will incorporate a 'surrender' covenant requiring the owner to 'give up' the right to develop under the existing planning permission.

108. As such, officers considered that the proposed redevelopment of the subject site can be incorporated into the 9,500 cap, replacing the previously granted consent and remains within Phase 1.

Conclusion on the provision of housing

109. Whilst residential uses are supported on this site at all policy levels, this is subject to both the provision of affordable housing where viable and also the contribution a scheme would make to a mixed and inclusive neighbourhood where student housing is proposed. The lack of onsite affordable housing means the development is inherently less likely to contribute to a mixed and inclusive neighbourhood than it might be, nonetheless it would make a

contribution to meeting the Mayoral and local-level housing delivery targets. The PIL would contribute to affordable housing delivery and the site would play its part in delivering the capacity identified in Southwark Plan allocation NSP70 of 2,200 new homes. The provision of PBSA housing is on balance in this instance considered to be acceptable. This is addressed in further detail in the 'Student accommodation' section of this report.

Student accommodation

Policy background

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

111. Policy H15 of the London Plan sets an overall strategic requirement for purpose-built student accommodation (PBSA) of 3,500 bed spaces to be provided annually. The supporting text to Policy H15 is clear that PBSA contributes to meeting London's overall housing need and is not in addition to this need. Section 3.9 of the Mayor of London's Housing SPG states that specialist student accommodation makes an essential contribution to the attractiveness of London as an academic centre of excellence.

112. Part A of Policy H15 states that boroughs should seek to ensure the local and strategic need for PBSA is addressed, provided that:

    1. the development contributes to a mixed and inclusive neighbourhood;
    2. it is secured for occupation by students;
    3. the majority of bedrooms and all affordable student accommodation is, through a nominations agreement, secured for occupation by students of one or more higher education providers;
    4. the maximum level of accommodation is secured as affordable student accommodation and;
    5. the accommodation provides adequate functional living space and layout.

113. Part B of Policy H15 encourages boroughs, student accommodation providers and higher education providers to deliver student accommodation in locations well-connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment schemes

114. Paragraph 4.15.3 of Policy H15 states that:

    "To demonstrate that there is a need for a new PBSA development and ensure the accommodation will be supporting London's higher education providers, the student accommodation must either be operated directly by a

higher education provider or the development must have an agreement in place from initial occupation with one or more higher education providers, to provide housing for its students, and to commit to having such an agreement for as long as the development is used for student accommodation. This agreement is known as a nominations agreement. A majority of the bedrooms in the development must be covered by these agreements".

115. Where this is not achieved, paragraph 4.15.5 states that the accommodation will be treated neither as PBSA nor as meeting a need for PBSA. Instead, the development proposal will *"normally be considered large-scale purpose-built shared living and be assessed by the requirements of Policy H16 Large-scale purpose-built shared living".*

116. At the local level, the Southwark Plan aims to deliver at least 40,035 homes between 2019 and 2036, equating to 2,355 new homes per annum. Policy ST2 of the Plan states that new development will be focussed in locations including Old Kent Road Opportunity Area, where the aim will be to balance the delivery of as many homes as possible against creating jobs, protecting industrial and office locations, sustaining vibrant town centres, and protecting open space and heritage.

117. Policy P5 of the Southwark Plan requires PBSA proposals where all the bedspaces would be 'direct-lets', as is the case with the scheme proposed set out below:

- as a first priority deliver the maximum amount of PBSA alongside a minimum of 35% of the habitable rooms as conventional affordable housing (subject to viability);
- in addition to this provide 27% of student rooms let at a rent that is affordable to students as defined by the Mayor of London.

118. Policy P5 is structured in recognition of the acute need for more family and affordable housing within the borough. One of the footnotes to the policy explains that *"allowing too much student accommodation will restrict our ability to deliver more family and affordable housing. By requiring an element of affordable housing, or a contribution towards affordable housing from student housing development providing direct-lets, we can make sure we work towards meeting the strategic need for student accommodation and our local need for affordable homes including affordable family homes"*.

119. As such, the student housing policies of the Southwark Plan and London Plan, Policy P5 and Policy H15 respectively, differ in two key ways:

- Policy H15 prioritises the delivery of the maximum viable number of affordable student rooms (and does not expressly require student housing proposals to deliver conventional affordable housing either on- or off-site), whereas Policy P5 prioritises the delivery of conventional affordable housing; and
- Policy H15 expects at least 51% of the bedspaces (the majority) to be subject to a nominations agreement, whereas Policy P5 requires

when none of the bedspaces are ‘direct-lets’, all the bedspaces to be subject to a nominations agreement subject to viability only.

120. Section 38(5) of the Planning and Compulsory Purchase Act 2004 (as amended) confirms that if to any extent a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy contained in whichever of those documents became part of the development plan most recently. As the Southwark Plan underwent examination and was adopted more recently than the London Plan, the policies within the Southwark Plan take precedence in this instance. The Council faces a complex situation locally with regard to the provision of affordable housing; at the Southwark Plan Examination in Public, the examining Inspectors recognised this challenge as presenting specific local circumstances in Southwark with regard to PBSA, and endorsed Policy P5 cognisant that the policy requirements do not fully align with those of the London Plan PBSA policies. Essentially, this means a student housing planning application within Southwark prioritising the conventional affordable housing contribution may be acceptable in principle in policy terms, despite not fully aligning with the expectations of London Plan Policy P15.

121. When assessing the principle of a student housing scheme, the policies outlined above require consideration of:

- the principle of introducing a housing use to this site;
- the local and strategic need for student housing;
- whether the student housing would contribute to a mixed and inclusive neighbourhood;
- securing the accommodation for student occupation;
- whether a nominations agreement has been secured;
- securing the maximum level of affordable housing subject to viability; and
- whether adequate and functional accommodation and layouts would be provided.

122. The following paragraphs of this report assesses the proposed development against these considerations. Later parts of this report deal with the other matters that these policies refer to, such as the affordable housing offer, quality of accommodation and transport aspects.

Assessment

Is there a local and strategic need for student housing?

123. There is a demand for more student accommodation across London, which needs to be balanced with making sure Southwark has enough sites for other types of homes, including affordable and family housing. The affordable housing element of the current application is considered further in a separate section of this report.

124. There are several higher education institutions (HEIs) in the borough with teaching facilities and student accommodation. These include London South Bank University (LSBU), Kings College London (KCL), University of the Arts (UAL) and London School of Economics (LSE). Mountview Academy, based in Peckham Rye, also provides a range of undergraduate and postgraduate degrees validated by the University of East Anglia (UEA). The borough is also home to some other smaller satellite campuses.

125. The strategic need for student accommodation is evidenced through the GLA paper 'Student Population Projections and Accommodation Need for new London Plan 2017' (amended October 2018). Drawing on Higher Education Statistics Agency (HESA) data, this document sets out the annual student housing need for 3,500 bed spaces within London over the plan period. The study projects the total student accommodation need in London to increase from 104,835 bed spaces to 171,063 bed spaces by the end of the plan period (2041/42).

126. The evidence base underpinning the Southwark Plan included a background paper on student housing, dated December 2019. It refers to the Council's Strategic Housing Market Assessment (SHMA) Update 2019, which found that:

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

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

Has the maximum level of affordable housing been secured?

128. Criterion 4 of London Plan Policy H15(A) requires the maximum level of accommodation to be secured as affordable student accommodation.

129. However, and as mentioned in earlier parts of this report, it is considered that Southwark Plan Policy P5, in its prioritisation of conventional affordable housing delivery (subject to viability), provides a legitimate alternative pathway for student accommodation proposals to provide maximised affordable housing. While such general needs affordable housing would preferably be delivered on-site, a payment-in-lieu may be appropriate in exceptional circumstances and subject to robust justification, as per the Council's Section 106 Planning Obligations and Community Infrastructure Levy (CIL) SPD.

130. Turning firstly to the matter of the London Plan's specific requirement for student housing proposals to deliver affordable rooms, while this is noted, the Council's priority is for conventional affordable housing due to the pressing need in the borough. Officers consider that although there would be some benefit to providing affordable student housing, this would be significantly outweighed by the benefits arising from general needs affordable housing delivery. Therefore, the latter should be prioritised. Southwark is one of the top four London Boroughs in terms of the provision of student housing and already contributes significantly to London's student housing needs (notwithstanding the fact that there remains an unmet demand for student housing in the borough as set out earlier in the report). In reviewing the viability of the scheme, therefore, the surplus has been considered in terms of a contribution towards general needs affordable housing, rather than for use in reducing the rent levels of students occupying the site. Including affordable student housing within the development would adversely affect the overall viability, and therefore the level of contribution the development could make to general needs affordable housing.

131. Turning next to the Southwark Plan preference for conventional affordable housing provision to be on- rather than off-site. On-site provision of affordable housing is generally preferred. Policy P1(6) of the Southwark Plan allows a payment in lieu cash payment towards affordable housing where affordable housing cannot be provided on site or on an off-site location in exceptional circumstances. The Affordable Housing SPD (2025) states that this will only be accepted where the payment in lieu can be robustly justified over on-site or off-site provision.

132. While the site benefits from the extant planning permission 20/AP/3560 for a conventional residential scheme that includes on-site affordable housing, this does not automatically justify refusal of the current application solely on the basis that it cannot deliver the same amount of on-site conventional affordable homes as the extant permission. Members are reminded that each planning application must be assessed on its individual merits The current proposal should be assessed against the policy requirements. Subsections A and B below are provided for the purpose of illustrating the site history and context.

A. Prospect of Implementing the Extant Permission (Ref: 20/AP/3560)

133. Back in 2018, the applicant submitted planning application 18/AP/2761 for a 12-storey building (plus basement) comprising 46 residential dwellings (Class C3) and commercial floorspace (Class B1(c)). The first planning permission was granted on 28 May 2020.

134. Following the grant of the first planning permission 18/AP/2761, the applicant secured an offer from HSPG in July 2021 to purchase the affordable units, subject to amendments to the approved scheme. HSPG's key requirements included the provision of a second core/third lift, separate access for service and management, and entire floors dedicated to affordable housing (i.e. no mixed tenure floors combining social, intermediate, or private units), primarily

for management reasons. These changes were incorporated into the second approved scheme 20/AP/3560, which proposed 16 affordable homes. This second planning permission was granted on 28 June 2023. However, HSPG has since withdrawn its offer for the 16 affordable homes due to changes in building regulations and a slowdown in the housing market.

135. Based on the information submitted by the applicant, following HSPG's withdrawal, a marketing campaign was undertaken throughout 2023 and 2024 to seek a new Registered Provider (RP) for the 16 affordable homes within the extant consent (ref: 20/AP/3560). Key actions included:

- National outreach: The affordable housing was marketed by two jointly instructed agents, reaching a combined database of over 10,000 property contacts.
- Targeted RP engagement: A focused campaign was directed at Southwark Council's list of registered RPs, as well as all known RPs active or previously active within London boroughs.

136. A separate campaign was also conducted to sell the entire site with the extant permission 20/AP/3560. Despite a reduction in the asking price, no offers were received.

137. The applicant has provided a summary of the responses from the RPs contacted. 12 RPs responded to the applicant's agents and confirmed that they were not interested in acquiring the 16 affordable homes within the extant consent 20/AP/3560 for the following reasons:

- Scheme size: 16 units is below the minimum threshold of interest, with most RPs requiring schemes of 50+ units.
- Building height: RPs are reluctant to acquire units in tall buildings due to associated costs and regulatory risks.
- Shared core Affordable units within a shared core with private housing pose service charge and management challenges
- Existing commitments Some RPs already have schemes in the Old Kent Road area that are facing viability issues.
- Funding priorities Several RPs are currently focusing resources on upgrading their existing housing stock.

138. Officers have also consulted the Council's Property Team who are satisfied that the developer is unlikely to be able to find an RP in the current market and that for the reasons in points 1-3 above, the council would not be

interested in acquiring the 16 affordable units in the extant scheme 20/AP/3560

139. The applicant has confirmed that it would not be viable to deliver the extant permission 20/AP/3560 without a RP. While some of the reasons cited by RPs for declining interest such as construction costs, budget constraints, and a focus on retrofitting existing stock are market-wide and may change over time, the site-specific concerns are unlikely to be resolved. Given the small size and triangular shape of the plot, along with policy requirements for reprovision of existing commercial floorspace, it is considered unlikely that a separate residential core and a sufficient quantum of affordable homes could feasibly be provided within a mixed-tenure housing scheme to address the concerns raised by RPs. It is therefore reasonable to conclude that the extant permission 20/AP/3560 is unlikely to be implemented within the 3-year time limit or in the foreseeable future.

B. Off-site provision of the affordable homes in the extant permission 20/AP/3560?

140. The applicant does not currently own any sites nearby and has explored a number of nearby development sites with the intention of delivering the 16 affordable housing requirements in the extant scheme 20/AP/3560 off-site. The applicant confirmed that they have formally offered on five separate sites within the OKR16 area:

Table 3: Sites within the OKR16 area considered for off-site affordable housing provision

Address	Planning status
74-94 Ormside Street	Planning permission 23/AP/2226 was granted on 4 September 2024 for the development of 49 homes, including 18 affordable units. However, the site is in Old Kent Road development Phase 2 and is not deliverable until contracts for the Bakerloo Line Extension have been confirmed.
Iberia House, 2 Hatcham Road	Planning permission 17/AP/4649 was granted on 29 May 2020 for 33 homes including 12 affordable units. The permission on this site has since expired and the site is now in Phase 2.
12-38 Hatcham Road	Planning permission 21/AP/1121 was granted on 09 December 2022 for 49 homes including 17 affordable units. The site is being refurbished and extended for use as a church. It is likely that the site will also be moved into Phase 2.
18 Manor Grove	The site is in Phase 2.
Credon House, Verney Road	Planning permission 21/AP/3247 was granted on 17 January 2023 for up to 22 homes which serves as off-site delivery for Pocket Living's Ossory Road scheme

	21/AP/3246. The council is in pre-application discussions with another developer regarding this site.

141. However, these off-site provision opportunities have not materialised as the sites were sold for either existing commercial or church uses, or the landowners are not interested.

142. In summary, since 2018, the applicant has developed and revised their conventional housing-led mixed-use proposals to enhance its appeal to registered providers. Following the withdrawal of HSPG's offer to acquire the 16 affordable homes in the extant permission 20/AP/3560, the applicant has also undertaken marketing exercise to registered providers, both for the 16 affordable units in the extant permission 20/AP/3560 and for the whole site since 2023. The applicant has demonstrated that despite these effort registered providers were not interested because of the recent market challenges as well as the scheme specific issues including shared core (cost and management), height of the scheme (too tall) and size of the scheme (too few units). The applicant has also explored off-site options for delivering affordable homes in the nearby area, but none of these landowners have accepted the applicant's offers.

143. The applicant has confirmed that the extant conventional housing-led scheme 20/AP/3560 could not be delivered viably without a registered provider. Officers considers that it is unlikely that the extant scheme 20/AP/3560 could be amended in a way that could attract RP interest either for the on-site affordable homes or the entire whole site in the foreseeable future given the site-specific constraints mentioned above.

C. Incorporation of conventional affordable homes within the proposed PBSA in this application 24/AP/3819?

144. Due to the small, triangular-shaped nature of the site, the current scheme has been designed with a single core to maintain separation between the student accommodation and the commercial element. This configuration ensures active frontages with entrances to the commercial units on the ground floor.

145. Introducing conventional affordable housing into the current scheme would require an additional core to provide independent access, separate from the student entrance. This would necessitate extra space for a lift, stair cores, and dedicated entrances particularly as two staircases are mandated for both cores by fire safety regulations and additional amenity space. These would also significantly increase the overall massing of the buildings. Furthermore, the main concerns around building height and the number of homes, which previously deterred Registered Provider interest in the extant conventional housing-led scheme 20/AP/3560, would still not be addressed. It is reasonable to anticipate that getting an RP would remain challenging.

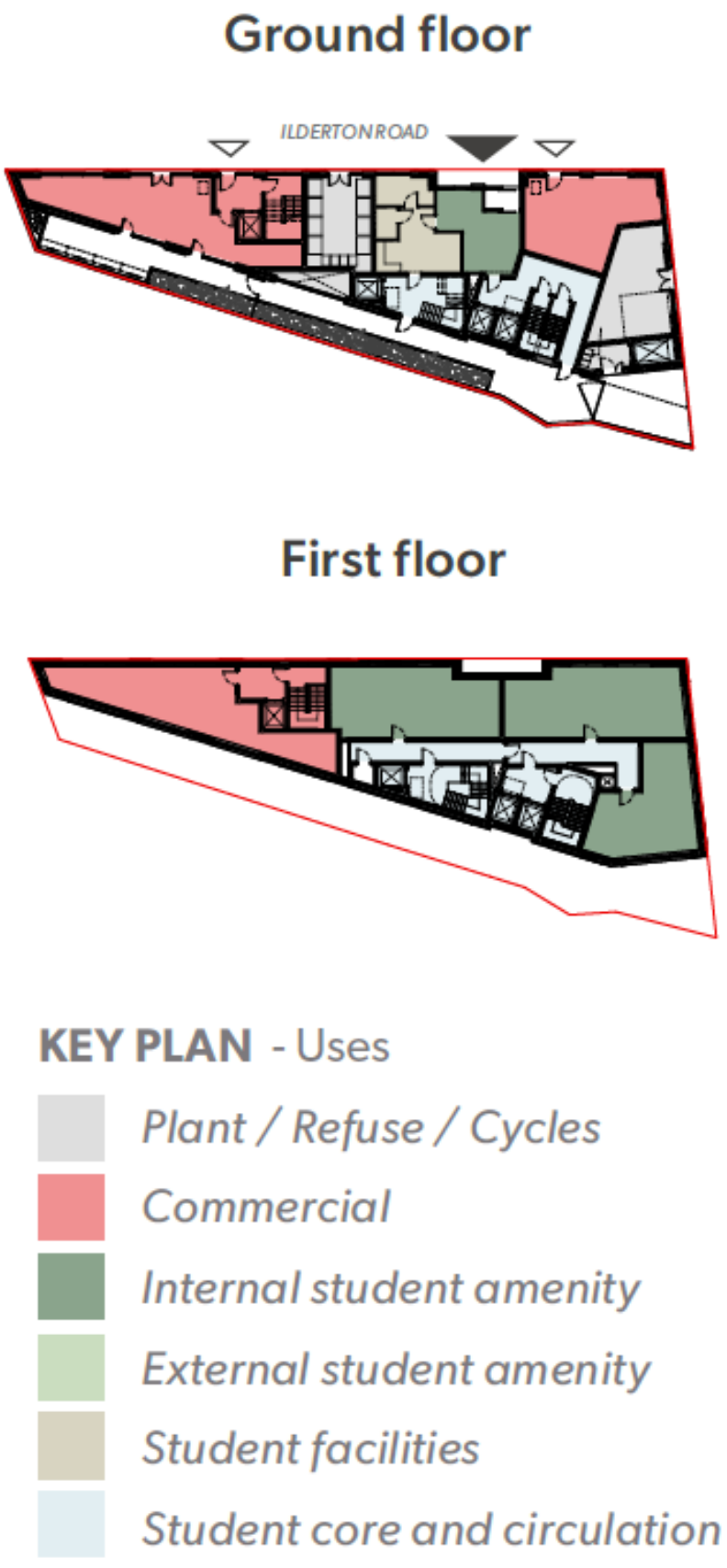


Image 12: *Proposed Ground Floor and First Floor Plans*

146. As mentioned in paragraphs 140-143, the applicant does not own any sites in the Old Kent Road area and has explored off-site provision of conventional affordable homes in some nearby sites, but the offers were not accepted by the respective landowners.

147. Given the reasons outlined above, officers consider it unlikely that either on-site or off-site affordable housing provision is feasible or deliverable in this site within this PBSA-led scheme in the foreseeable future. In light of these exceptional circumstances, a Payment in Lieu is considered an acceptable and appropriate alternative on balance in this instance. This approach would enable the Council to deliver affordable housing on its own sites and support the redevelopment of this underused brownfield plot. The proposed development has been reviewed to determine the maximum viable contribution towards conventional affordable housing. The current offer of 35% Affordable Housing Payment in Lieu (PIL) offer represents the maximum viable contribution. The matter of viability is dealt with in detail in a subsequent part of this report.

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

148. Criterion 1 of London Plan Policy H15(A) requires student housing proposals to contribute to a mixed and inclusive neighbourhood.

149. AAP Policy 4 (Student Homes) of the draft AAP (2024) states that developments with student homes should demonstrate that they would integrate with the existing and future residential and business communities creating successful mixed and inclusive neighbourhoods, taking account of:

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

150. Alongside the PBSA, the proposed development would include business and commercial space in the form of light industrial units (10% affordable workspace), which would comply with criteria 2.1 of the draft AAP Policy 4

151. The immediate existing area surrounding the application site is characterised by a mix of uses, including residential, commercial industrial, educational, cultural and leisure uses. There are a number of large residential estates

containing terraced houses and flatted residences within a range of point-blocks and deck-access buildings including:

- Tustin Estate (approximately 10m metres west of the application site);
- Bonamy and Bramcote Estate (approximately 480m metres north-west of the application site); and
- Winslade Estate in Lewisham (approximately 40m metres east of the application site)

152. There are 4 PBSA schemes within the Old Kent Road Opportunity Area (OKROA) which have been completed or are nearly completed. In total, these schemes provide 1,193 PBSA rooms in the OKROA as shown in the table below. One of them are located within subarea 4 (See also Image 14 below)

Table 4: Completed / Nearly completed PBSA Development within the OKR OA

Address	Description	Distance from the application site	Site allocation
313 -349 Ilderton Road	A total of 250 student rooms (including 36 nomination units and 88 affordable student units) alongside 58 affordable homes and light industrial use at ground and first floor levels.	Circa 300 metres	OKR16 (subarea 4)
671-679 Old Kent Road (20/AP/2701)	A total of 267 rooms (including 46 nomination units and 93 affordable student units) along side light industrial use at ground floor.	Circa 590 metres	OKR13 (subarea 3)
272 St James Road (18/AP/0156, allowed by appeal)	A total of 250 rooms. All direct let.	Circa 930 metres	OKR11 (subarea 2)
43-47Glengall Road (20/AP/0039)	A total of 676 rooms including 237 affordable student units) alongside a creative Commercial centre with a community café. Completion is expected in 2025.	Circa 1.3 km	OKR10 (subarea 2)

153. In terms of the emerging context, the application site is within site allocation 16 within subarea 4 of the draft OKR AAP. The table below shows there have been 245 conventional homes, 250 PBSA beds and 5,556 sqm of commercial space completed within OKR 16, and there is currently one scheme under construction which will provide a total of 254 conventional homes and 2,538sqm commercial floorspace. Several planning applications have been approved or received resolution to grant by the planning committee for the sites which will deliver a further 477 PBSA bedspaces, 1,148 Purpose Built Co-Living (PBCL) units, 410 conventional homes, and 9,429 sqm commercial floorspace. This scheme will result in an overall 896 student bedspaces within the OKR 16, and approximately 38.1% of all types of housing (in terms of number of equivalent of conventional homes) built, and in construction or consented/authorised within OKR16 will be affordable.

Table 5: Schemes built, in construction or consented/authorised within the OKR16 Site Allocation							
Ref on Image 13	Planning Ref	Address	Student beds	Co-living units	Conventional homes		Non-resi
					Total	affordable	
Built							
1	16/AP/1092	171-177 Ilderton Road	N/A	N/A	8	0	338
2	16/AP/2436	Atar House, 179 Ilderton Road	N/A	N/A	9	0	166
3	17/AP/3757	62 Hatcham Road	N/A	N/A	86	26	1,185
4	17/AP/4546	180 Ilderton Road	N/A	N/A	84	84	2,351
5	20/AP/1329	313-349 Ilderton Road	250	N/A	58	58	1,526
Subtotal			**250**	N/A	**245**	**168**	**5,566**
Under Construction							
6	19/AP/1773	227-255 Ilderton Road	N/A	N/A	254	92	2,538
Subtotal			N/A	N/A	**254**	**92**	**2,538**
Approved							
7	21/AP/1121	12-38 Hatcham Road	N/A	N/A	49	16	1,500
8	21/AP/1619	132-136 Ormside Street	N/A	N/A	0		270
9	23/AP/2226	78-94 Ormside Street	N/A	N/A	49	18	1,242
Resolution to grant subject to s106 and GLA Stage II referral							
10	22/AP/1603	18 - 22 Penarth Street	N/A	283	47	47	4,176
11	24/AP/3575	Ilderton Wharf, 1-7 Rollins Street	477	N/A	79	79	1,845
12	24/AP/3687	79-161 Ilderton Road	N/A	865	186	186	396
Subtotal			**477**	**1,148**	**410**	**346**	**9,429**
Overall total			**727**	**1,148**	**909**		
Total number of equivalents of conventional homes excluding the extant permission 20/AP/3560 and this application 24/AP/3819			**1,534**			**606 (39.5%)**	**17,533**
This app 24/AP/3819			169	N/A	N/A	N/A	225
Overall total			**896**	**1,148**	**909**		
Total number of equivalents of conventional homes including this app 24/AP/3819			1590			**606 (38.1%)**	17,758

** For the purposes of calculating a conventional residential equivalent in the Old Kent Road housing phasing plan, 3 student rooms or 3 co living rooms are the same as single conventional home.

154. Considering emerging developments within subarea 4, to the south-west of the site, a hybrid planning permission for a total 690 homes (488 net additional homes including 241 net affordable homes) and 5,666 (GEA) non-residential floorspace was granted for the Tustin Estate renewal (ref: 22/AP/1221). Tustin Estate renewal is outside of OKR16 (and is outside all of the AAP allocations). Phase 1 of the Tustin Estate renewal is currently undergoing construction which will deliver 167 conventional homes. Construction of phase 2 for 295 conventional homes is expected to commence in 2026.

Table 6: Tustin Estate Renewal

Ref on Image 13	Ref	Address	Student beds	Co-living units	Conventional homes		Non-resi
					Total (net)	Affordable (net)	
13	22/AP/1221	Tustin Estate	N/A	N/A	488	241	5,666

155. Further to the south of the site, the mix-used redevelopment at 840 Old Kent Road (ref:19/AP/1322) within site allocation OKR 17 in subarea 4 is near completion. It will deliver 171 affordable conventional homes alongside 1,831 retail floorspace.

Table 7: Schemes built, in construction or consented/authorised within the OKR17 Site Allocation

Ref on Image 13	Ref	Address	Student beds	Co-living units	Conventional homes		Non-resi
					Total	Affordable	
14	19/AP/1322	840 Old Kent Road	N/A	N/A	171	171	1,831

156. In site allocation 18 which is also within subarea 4, in addition to a completed conventional housing scheme of 80 homes at 8-24 Sylvan Grove, it is noted that new developments involving PBSA have been given planning consent or resolution to grant. These sites are located approximately 270 metres south-west of this application site, and affordable conventional homes will be provided alongside the PBSA. (See also Image 14 below)

Table 8: Schemes built, in construction or consented/authorised within the OKR18 Site Allocation

Ref on Image 13	Ref	Address	Student beds	Co-living units	Conventional homes		Non-resi
					Total	affordable	
Built							
15	15/AP/1330	8-24 Sylvan Grove	N/A	N/A	80	80	N/A
Approved							
16	23/AP/1862	747-759 & 765-775 Old Kent Road and Land at Devonshire Grove	941	N/A	200	200	908
Resolution to grant subject to s106 and GLA Stage II referral							
17	23/AP/0582	19-35 Sylvan Grove London Southwark SE15 (Daisy Business Park)	688	N/A	23	23	2,000

157. Considering the schemes built, in construction or consented/authorised within subarea 4, as a result of the PBSA proposed in this application, the total number of affordable homes coming forward will be 1,241, approximately 41.1% of all types of housing (in terms of units) as shown in the table below:

Table 9: Number of equivalent of conventional homes from the application 24/AP/3819 and schemes within subarea 4

	Student beds	Co-living units	Conventional homes		Non-resi
			Total	Affordable	
Schemes built, in construction or consented/authorised within the OKR16 Site Allocation *	727	1,148	909	606	17,533
Schemes built, in construction or consented/authorised within the OKR17 Site Allocation	0	0	171	171	1,831
Schemes built, in construction or consented/authorised within the OKR18 Site Allocation	1,629	0	223	223	2,908

Tustin Estate renewal	N/A	N/A	488 (net)	241 (net)	5,666
This app 24/AP/3819	169	N/A	N/A	N/A	225
Total	2,525	1,148	1,793	1,241 (41.1%)	28,163
Total number of equivalents of conventional homes **	3,017				

* The extant permission of the application site 20/AP/3560 is not included

* For the purposes of calculating a conventional residential equivalent in the Old Kent Road housing phasing plan, 3 student rooms or 3 co living rooms are the same as single conventional home.

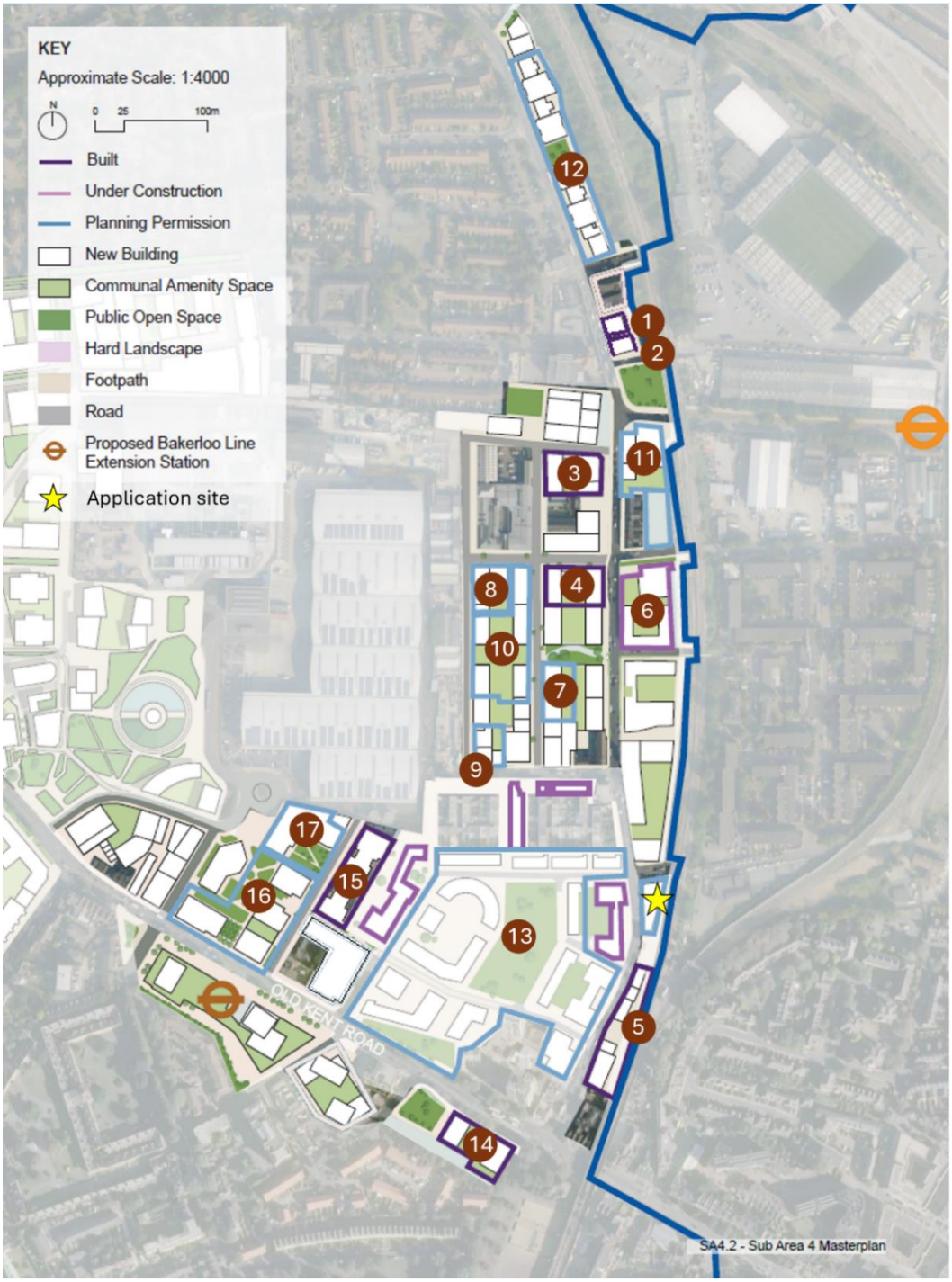


Image 13: *Schemes built, in construction or consented/authorised within subarea 4*

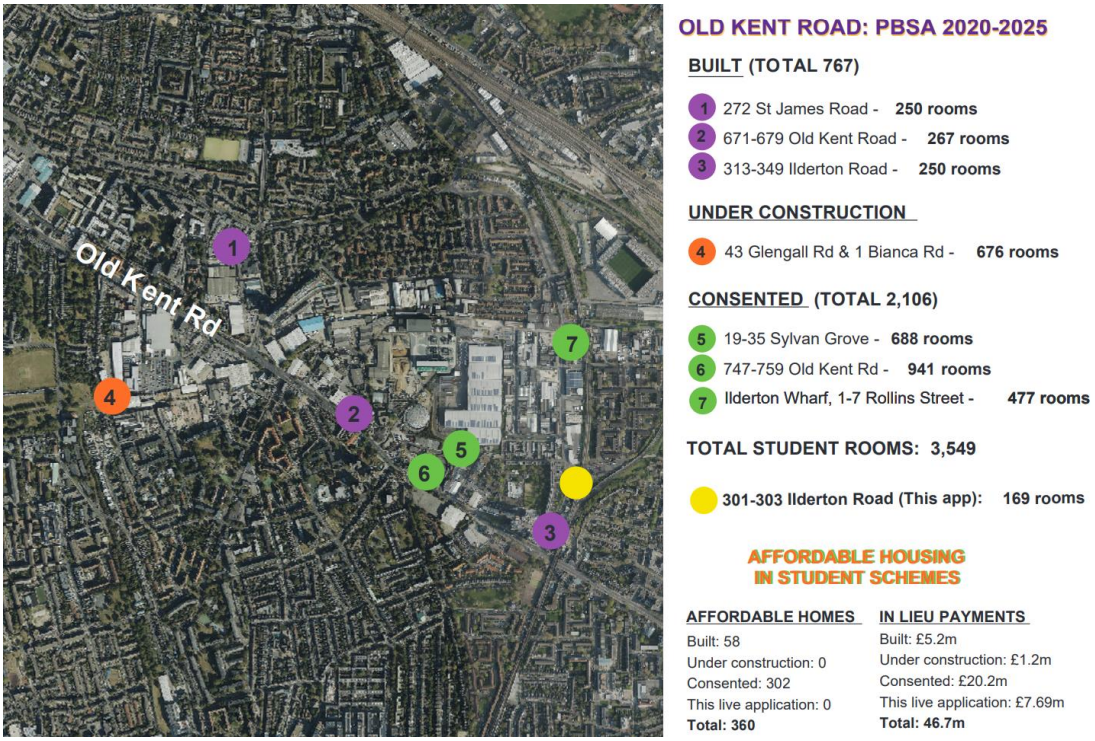


Image 14: *PBSA schemes in the Old Kent Road Opportunity Area between 2020 and 2025*

158. The lack of onsite affordable housing in the proposal means the development is inherently less likely to contribute to a mixed and inclusive neighbourhood than it might be. However, as stated in the above, the applicant has explored options of delivery of affordable homes onsite and off-site but these options are not feasible or deliverable in the foreseeable future.

159. When considering cumulative impacts of the emerging PBSA developments nearby, it should be noted that some of these schemes may or may not be implemented despite the grant of planning permission. Also, these PBSA schemes within site allocations OKR16 and OKR18, together with other conventional housing schemes and the Tustin Estate renewal within subarea 4, if implemented will also deliver a substantial number of new homes with different bedroom and tenure mix (circa 1,793 conventional homes including 1,241 affordable homes) together with non-residential uses in the area. Furthermore, there also other sites available within the site allocations that could potentially come forward for conventional housing development within subarea 4.

160. In summary, it is recognised that the proposal is less likely to contribute to a mixed and inclusive neighbourhood than might otherwise be the case. The applicant has also demonstrated the challenges of delivering conventional affordable housing either on-site or off-site. The surrounding area of the application site includes established housing estates. Taking into account the cumulative impact of emerging pipeline developments nearby and the number of student beds proposed in this application, 39.5% of all types of housing within OKR16 and 41.1% within sub-area 4 would be affordable homes. On balance, the proposed development is therefore considered to

meet Criteria 2.2 and 2.3 of Draft AAP Policy 4 in these exceptional circumstances.

161. The proposal would also contribute to other plan priorities through Affordable Housing Payment in Lieu (PIL) (See also the Affordable housing and development viability section below) and affordable workspace (see also the Principle of Development – non-residential development section below). Hence, it would also comply with criterion 2.4 of the draft AAP Policy 4.

Would the accommodation be secured for student occupation?

162. Criterion 2 of London Plan Policy H15(A) requires the use of the accommodation to be secured for students.

163. The proposed development will be managed by an independent provider, most probably Homes for Students, an Accreditation Network UK certified operator. As such, responsibility will rest with Homes for Students to ensure the units are let to students on courses with HEIs. Student-exclusive use will be secured by way of an obligation in the Section 106 Agreement.

164. A supporting paragraph to Policy H15 notes that boroughs should consider allowing the temporary use of accommodation during vacation periods for ancillary uses. The viability evidence base for the Southwark Plan tested direct-let student housing schemes assuming a 40 week term time tenancy with 11 week non term-time let allowance. In light of this, it is considered reasonable to allow the operator of the proposed student housing scheme to let the rooms during the vacation period when not in use by the principal student occupiers. This will be secured through the Section 106 Agreement.

Is a nominations agreement in place?

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

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

Does the accommodation provide adequate functional living space and layout?

167. A supporting paragraph to London Plan Policy H15 states that schemes not securing a nominations agreement for the majority of the accommodation will normally be considered as large-scale purpose-built co-living (PBCL). The London Plan expects the quality of accommodation PBCL schemes to be assessed against the requirements of Policy H16 and Purpose-built Student Accommodation London Plan Guidance (2024); these are more onerous than the counterpart standards for PBSA, which are set out in Criterion 5 of Policy H15(A). However, owing to the supportive position of the Southwark Plan regarding the principle of 100% direct-let PBSA, when assessing whether the accommodation proposed by this planning application would provide adequate functional living space and layout, it is considered appropriate to do so against the standards set by Criterion 5 of Policy H15(A) rather than Policy H16.

168. Criterion 5 of Policy H15(A) requires the accommodation to be adequate and functional in terms of its living space and layout. Southwark Plan Policy P5 which requires 5% of student rooms as “easily adaptable for occupation by wheelchair users”.

169. It is considered that the proposed development would provide good quality accommodation for students, meeting the expectations of the London Plan Policy H15 Part A (5) and Southwark Plan Policy P5. The spatial arrangement, environmental internal conditions, level of amenity (within the individual units and the communal spaces), and the provision of wheelchair housing would all be adequate, as explained in detail in a subsequent part of this report entitled ‘Quality of Accommodation’.

Is the location suitable for student accommodation?

170. Part B of London Plan Policy H15 requires student housing scheme sites to be well connected by transport to local services. Situated within the Opportunity Area and proximity to the Old Kent Road South District Town Centre (within 5 minutes’ walk), the site benefits from future transport improvement which would result in high accessibility to public transport, conveniences and services. There are also numerous leisure and recreation spaces available for students nearby, including Brimmington Park and Bridgehouse Meadows. Goldsmiths approximately 20 minutes away by bus. For all of these reasons, the application site is considered to a suitable location for PBSA.

Summary on the principle of student housing

171. In conclusion, through its assessment of the deliverable housing sites in the borough, the Council can demonstrate a five year supply of housing land, plus the necessary 20% buffer required by the housing delivery test. The Southwark Plan anticipates will come forward at an average of approximately 601 homes per year over the period to 2036. With 169 student rooms

proposed, the development would contribute the equivalent of 56 (rounded) homes towards meeting the Council's housing targets. This would make a positive contribution towards the annual target of 601 homes, and as such is welcomed. It would also reduce pressure on the local private rented market, in that it would release back to the private rented sector 56 single dwellings that would otherwise be in student occupation. In addition, affordable housing payment in lieu is also secured to deliver conventional homes elsewhere in the borough.

172. The proposed student housing scheme therefore would not compromise the Council's ability to meet its strategic housing targets set out in the Southwark Plan and London Plan, because student housing contributes towards the borough's housing delivery targets. However as noted in the Southwark Plan the provision of student housing needs to be balanced with making sure there are enough sites for other types of homes including affordable and family homes.

173. The site is considered to be appropriate in principle for student accommodation, meeting a demonstrable need and achieving compliance with the requirements of London Plan Policy H15, Southwark Plan Policy P5 and draft AAP Policy 4. The proposal would provide high quality accommodation for students in an accessible and sustainable location. While the proposal without any on-site conventional affordable homes is inherently less likely to contribute to a mixed and inclusive neighbourhood than it might otherwise. However, the Applicant has demonstrated that both on-site and off-site affordable conventional housing options are considered unfeasible and undeliverable in the foreseeable future. Considering the existing large residential estates nearby and the emerging context with other mixed-use development nearby within site allocation OKA16 and OKA18, the Tustin Estate renewal and the wider Old Kent Road Opportunity Area, the introduction of the proposed 169 student beds along commercial uses would on balance have an acceptable in this instance.

174. For the reasons given above, the proposed student accommodation use would help contribute to the strategic housing delivery targets of the development plan, but in order to ensure the Council's vision to "build more homes of every kind in Southwark and to use every tool at our disposal to increase the supply of all different kinds of homes", as set out in Southwark Plan Policy ST2 is met the balance with conventional housing needs to be considered as well. As set out above in paragraphs 148 to 161 when considering the development coming forward in the site allocation area on balance there is still considered to be an acceptable mix of homes in this neighbourhood.

175. It is noted that planning application 23/AP/1317 for a mixed used development of 592 PBSA bedspaces, self-storage and light industrial units at 257-283 Ilderton Road was recently refused on the grounds of failure to deliver any conventional affordable housing on site and to contribute to a mixed and inclusive neighbourhood in February 2025. That scheme is currently under appeal. Each application must be assessed on its own merits

and circumstances. Officers consider this scheme 24/AP/3819 to be materially different from the appeal scheme 23/AP/1317, particularly in terms of the site's size, shape, and the scale of development.

Table 10: Comparison of the Appeal scheme at 257-283 Ilderton Road 23/AP/1317 This Application 24/AP/3819

	Appeal scheme at 257-283 Ilderton Road 23/AP/1317	**This Application 24/AP/3819**
Size (ha)	0.34	0.057
Shape	Rectangular	Triangular
Aerial photo of the site	  The two images above are of the same scale	
Proposed no. of student beds	592	169
3D-visualisation	  The two images above are not in the same scale	

176. It is also worth noting that since the Planning Committee resolved to refuse application 23/AP/1317 on 10 December 2024, a revised National Planning Policy Framework (NPPF) was published on 12 December 2024. The updated NPPF introduces a presumption in favour of brownfield redevelopment. Paragraph 125 of the NPPF (2024) states:

"Give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs. Proposals for such

development should be approved unless substantial harm would be caused, and support should be given to appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land."

177. As outlined above, while the proposal in this application 24/AP/3819 without any on-site conventional affordable homes is inherently less likely to contribute to a mixed and inclusive neighbourhood than it might otherwise, the impact would not be substantial enough to outweigh the benefits of using brownfield land for meeting the housing needs via directly on-site delivery of 169 student bedspaces and a payment-in-lieu of £7,689,500, and indirectly through release local family housing of 56 homes. Accordingly, it is considered that the impact would not be substantial enough to warrant refusal in this instance.

Non-residential (commercial/employment/business) uses

Policy background to employment/business uses

178. At the borough level, a strategic target of the Southwark Plan is to build a strong, green and inclusive economy. To achieve this, Policy SP4 aims to bring forward at least 460,000 square metres of new office space between 2019 and 2036 (equating to around 35,500 jobs), of which 90,000 square metres should be located outside the CAZ. The policy goes on to say this 90,000 square metres of employment use should include industrial, distribution, hybrid and studio workspace. It also sets a strategic target of 10,000 new jobs for the Old Kent Road Opportunity Area and expects 10% all new employment floorspace to be affordable workspace for start-ups and small and independent businesses.

179. Policy P30 of the Southwark Plan identifies sites within the CAZ, opportunity areas and town centres as appropriate for accommodating the significant growth needed to meet business demand. This policy requires development proposals at the very least to maintain, but where possible increase, existing levels of business floor space. Applications proposing employment floorspace should be supported by a marketing strategy to demonstrate how the facilities would meet current market demand. In opportunity areas, Policy P30 states that proposals should help contribute to mixed use neighbourhoods by incorporating new types of flexible business workspace accommodating manufacturing, technology, science, creative and cultural industries and the digital economy.

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

Assessment

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

181. The site comprises a 168 sqm single-storey building that previously operated as a motor vehicle repair centre (Use Class B2). Additionally, a 57 sqm building and associated temporary structures are currently in use as a car wash (Sui Generis). The total industrial floorspace capacity of the site is 225 sqm.

182. The commercial units on the ground and first floors of the proposed building will accommodate 225 sqm GIA of light industrial units. The comparison of existing and proposed employment floorspaces are provided below:

Table 11: Proposed Commercial Uses and quanta: Summary table				
	Class B2	**Sui Generis**	**Class E(g)(iii)**	**Total**
Existing	168	57	0	225
Proposed	0	0	225	225
Net increase				0

183. Overall, the proposals would re-provide the existing quantum of non-residential floorspace requirement stated in the site allocations NSP70 in the Southwark Plan and OKR16 allocation in the draft OKR AAP. The smaller nature of the light industrial units would also meet the needs of the creative industries.

184. Furthermore, a planning condition have been imposed to restrict the commercial units to light industrial uses (Class E(g)(iii)) only. This would preclude any potential future changes of use to other sub-categories within Class E that would otherwise be permitted under the GPDO. Currently, there are not any permitted development rights to go from B8 to any other use class. A planning obligation has been attached to ensure 225 square metres GIA of light industrial (Class E(g)(iii)) will be retained throughout the lifetime of the development. This is to ensure the long-term land use vision for this part of the OKROA is realised. To help ensure that the units are fit for purpose and attractive to occupiers, the s106 obligation will also specific a basic level of fit out to a “Cat A” standard, to include kitchens, toilets, lighting and basic ventilation and extraction equipment.

Business Relocation Strategy

185. Policy P33 of the Southwark Plan requires a business relocation strategy written in consultation with affected businesses be provided where existing small or independent businesses or small shops may be displaced by development. The business relocation strategy must set out viable relocation options.

186. The car wash operators are currently on a short-term tenancy agreement as a meanwhile use, which is subject to the site's redevelopment under the existing extant consent (ref: 20/AP/3560). The extant consent does not require a Business Relocation Strategy. The extant permission has already established that the car wash operator would have to vacate, and the short-term tenancy can be terminated at any point following the grant of that permission without a Business Relocation Strategy regardless of this application. It is therefore considered a Business Relocation Strategy is not required in this instance.

Affordable workspace

187. Policy P31 of the Southwark Plan deals with affordable workspace. Although affordable workspace technically applies to employment/business uses, Criterion 2 of the policy requires major development proposals to deliver affordable workspace amounting to at least 10% of the gross new employment floorspace (i.e. not just employment/business space, but commercial space too) for any developments proposing 500sqm GIA or more employment floorspace. The workspace should be secured on site at a discounted market rent for a period of at least 30 years. The policy recognises that there are many different forms that such space could take depending on the site location, characteristics, the nature of local demand and existing/proposed uses.

188. The total quantum of proposed employment-generating floorspace within the development is 225 square metres GIA. Under the terms of Policy P30, no affordable workspace is required. However, the Applicant has committed at least 10% of this (i.e. at least 22.5 square metres) would be dedicated as 'affordable workspace' which is welcome.

189. The Section 106 Agreement will include a dedicated affordable workspace schedule. This will ensure, among other things, that:

- the workspace is provided for a 30-year period at a peppercorn rent for months 0-11, and then from 12 months until the end of the affordable workspace lifetime at no more than £12/sq.ft;
- the capped rental rate of £12/sq.ft will be inclusive of service charges;
- no part of the self storage can be occupied until the affordable workspace has been fitted-out to the agreed specification ready for occupation; and
- a Full Management Plan and a Full Marketing Strategy, both to be secured in advance of the marketing period and first operation of the workspace.

190. For the reasons given above, the proposed affordable workspace offer exceeds the policy requirement.

Conclusion on uses

191. The proposed land uses are on balance appropriate in policy terms for this site within the Old Kent Road Opportunity Area. The introduction of PBSA would facilitate the growth of the borough's education offer. The provision of on site affordable housing would have made a more significant contribution to the delivery of a mixed and inclusive neighbourhood, and the applicant originally pursued a mixed tenure conventional housing led scheme 20/AP/3560, but the lack of interest from RPs has resulted in this PBSA scheme with off-site affordable housing offer via a PIL in order to secure the sites redevelopment given both the current market challenges and site specific constraints stemmed from the small and triangular nature of the plot.

192. The proposed commercial units would be complementary to, and would co-exist well with, the proposed student homes. These units would activate the

Ilderton Road and Hornshay Street frontages. The provision of 22.5 sqm affordable workspace would exceed the affordable workspace policy minimum requirements. The proposals, in providing a mix of residential and employment-generating uses, meet the expectations of the Southwark Plan and draft OKR AAP site allocations.

193. The range of proposed uses will generate new jobs and revitalise this longstanding under-optimised site. The proposed development would provide essential employment opportunities, place-making and public realm for both future and existing communities. In conclusion, the proposed uses are on balance considered to be acceptable.

Affordable housing and development viability

Policy background

194. National, regional and local planning policies place a high priority on the delivery of affordable housing as part of the plan led approach to addressing the housing crisis. Southwark's Strategic Housing Market Assessment (SHMA) identifies a need for 2,077 social rent and intermediate homes per annum which is approximately 71% of Southwark's total housing need. The SHMA suggests that approximately 78% of the total affordable housing need is for intermediate housing to meet the housing needs of lower and middle income residents. However, the most acute need is for social rent housing to meet the needs of homeless households living in unsuitable temporary accommodation such as bed and breakfasts or overcrowded conditions.

195. Southwark Plan Policy P5(2) states that purpose built student housing when providing direct lets at market rent must provide the maximum amount, with a minimum of 35% as conventional affordable housing by habitable room subject to viability, as per policy P4, as a first priority. In addition to this, 27% of student rooms must be let at a rent that is affordable to students as defined by the Mayor of London.

196. Alternatively, P5(3) states that when providing all of the student rooms for nominated further and higher education institutions, provide the maximum amount of affordable student rooms with a minimum of 35% subject to viability. The affordable student rent should be set as defined by the Mayor of London.

197. The Southwark Plan includes a Fast-Track route. The relevant policy, Policy P1, states that a detailed interrogation of viability will be waived only where a development provides 40% affordable housing in a policy compliant tenure mix (i.e. a minimum of 25% social rent and a minimum of 10% intermediate housing), with no grant subsidy. The 40% Fast-Track threshold is calculated on a habitable room basis.

198. The Southwark's new CIL and S106 SPD has recently been adopted in July 2025 It requires an in lieu payment of £130,000 per habitable room of conventional affordable housing.

Assessment of maximum viable amount of payment-in-lieu

199. The applicant has submitted a Financial Viability Assessment (FVA) in accordance with the Affordable Housing SPD and Southwark Plan Policy P5 to allow an assessment of the maximum level of affordable housing that could be supported by the development. The appraisal was reviewed by BPS on behalf of the Council.

200. Officers and BPS have scrutinised the assumptions used in the FVA and held extensive discussions with the applicant. Initially, the applicant proposed an affordable housing payment in lieu of £6,760,000 based on 40% of the habitable rooms and the then affordable housing tariff of £100,000 per habitable rooms as set out in the former CIL and S106 SPD. Additional evidence was provided regarding abnormal costs, Operating Expenses or Expenditure (OPEX) and the yield for the PBSA. While some differences in assumptions remain including around passing rent for the PBSA and finance costs, BPS has confirmed that an in-lieu payment of £7,689,500, equivalent to 35% of the habitable rooms (60 habitable rooms) at the current affordable housing tariff (£130,000 per habitable room) as set out in the recently adopted CIL and S106 SPD falls within a reasonable margin of 1% of the Gross Development Value (GDV) in BPS's appraisal. Taking into account the likely abnormal costs and comparisons with recent financial viability reviews of nearby consented PBSA schemes, officers considered that the proposed offer represents the maximum viable contribution, subject to early-stage review mechanisms.

201. It is also worth noting that this application was validated in February 2025, prior to the adoption of the new CIL and S106 SPD in July 2025. Although no transitional arrangements apply, the proposed payment-in-lieu of £7,689,500 equates to 45.5% of habitable rooms under the previous tariff of £100,000 per room. The applicant has agreed to this amount, which will be secured through a Section 106 agreement.

Review mechanisms

202. The Section 106 Agreement will secure an Early Stage Review in the event of implementation being delayed for more than two years, in accordance with Policy H5 (F) (2).

203. It is noted that BPS suggested late-stage review mechanism However, the recently adopted Affordable Housing SPD (2025) states that such review mechanisms are only required for schemes that do not meet the minimum 35% provision of affordable housing as set out by policy P1. In this instance, the proposed payment in lieu is equivalent to 35% of the habitable rooms in the scheme. Therefore, it is considered that a late stage review is not required.

Conclusion on affordable housing and development viability

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

205. The payment in lieu of £7,689,500 million index-linked offered by the applicant is substantial and could contribute to delivering affordable housing through its Council Homes Building Programme. The acceptability of the offered payment-in-lieu is based on the specific merits of this proposal, taking account of all the material considerations highlighted above. It is considered that the Council Homes Building Programme is a more effective way to provide conventional affordable housing under current economic climate, to the extent that any departure from the on-site preference of the NPPF, London and Southwark Plan is justified (for the above reasons based on the specific merits of this student housing proposal).The PIL would be required to be paid 25% on implementation of the scheme, 50% on completion of the scheme and 25% prior to first occupation of the scheme.

Quality of residential accommodation

Policy background

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

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

- Criteria 1 - Provide a high standard of quality of accommodation for living conditions;
- Criterion 6 - Provide acceptable levels of natural daylight by providing a window in every habitable room;

- Criterion 7 - Achieve a floor to ceiling height of at least 2.5 metres for at least 75 per cent of the Gross Internal Area of each dwelling to maximise natural ventilation and natural daylight in the dwelling; and
- Criterion 14 - Provide communal facilities.

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

Spatial arrangement

209. Three different 'bedspace' formats are proposed. 77% of the 'bedspace' formats proposed are regular studios (130 rooms). The studio typology is a self-contained apartment equipped with a shower room and all the necessary facilities to meet the sleeping, living and food preparation needs of the individual occupier.

210. The regular studios would either be 16 or 18 square metres GIA. Although these particular unit types are of an efficient configuration, the layouts submitted as part of the planning application include furnishings to illustrate how small double sized beds, a desk and storage space could be accommodated in a way that would not be cramped or impractical for use. The occupier would be expected to dine at their desk. On balance, and taking account of the level of internal communal facilities provided within the PBSA buildings that would supplement the private individual accommodation, the regular studios are considered to be of an adequate size and layout.

211. With regard to the accessible studios, they are 13 in total representing 7.7% of the overall student room provision. These studios will be 24 square metres GIA. The premium studios are generously proportioned and would provide very good levels of residential amenity for the occupiers.

212. The remaining 26 bedspaces would take the form of 2 private en-suite bedrooms within a 30.8 square metre GIA two-dio room, where the occupiers would share an open-plan communal kitchen, living and dining space. The bedrooms would be furnished with a small double size bed, a desk and storage space.



Images 48 and 49 *(above, left to right): Annotated axonometric of typical studio room (top) and two-dio room (bottom) and precedent photograph showing the general layout as well as the typical quality of furnishings and fittings.*

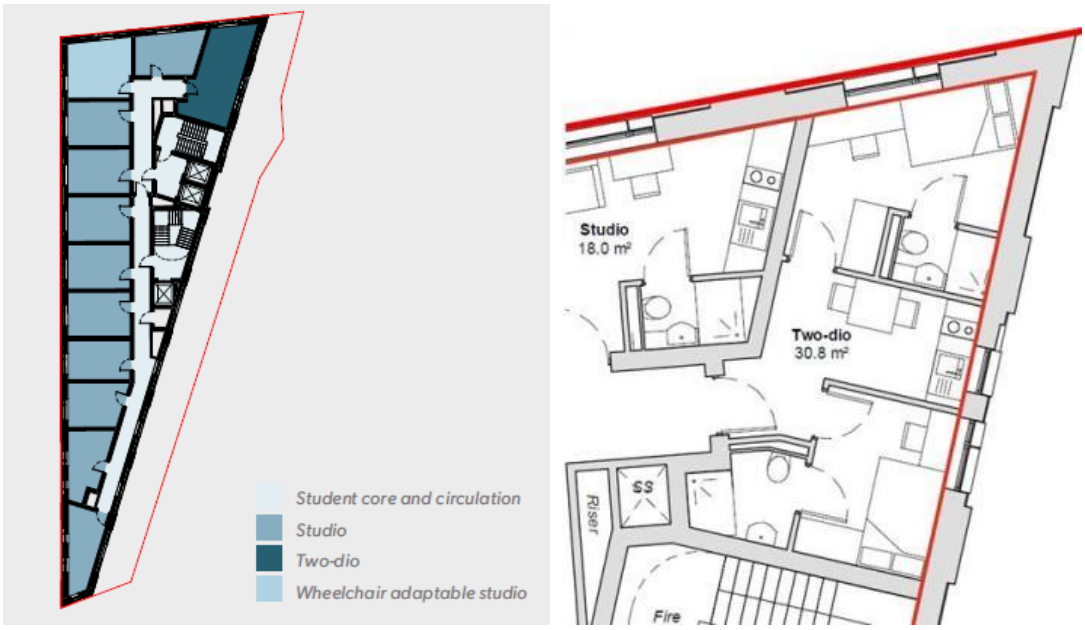


Image 15: ***Left:*** *Distribution of the studio, two-dio and wheelchair adaptable studio from second floor to thirteen floor.* ***Right:*** *Typical layout of the two-dio rooms*

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

Environmental comfort

214. The site is exposed to moderately elevated noise levels with road noise to the west and railway noise to the east. There are also commercial noise sources in the area. The Noise Impact Assessment submitted with the application outlines how, through a suitably designed façade with upgraded glazing and ventilation strategy with mechanical ventilation (See also overheating section below) would ensure appropriate internal noise conditions are achieved. Conditions are recommended requiring pre-occupation testing of the separating floors and walls to demonstrate that the relevant acoustic performance standards, have been met. This will ensure that the occupiers of the dwellings do not experience excess noise, transmitted either vertically or horizontally, from adjacent sound sources. A condition has also been attached to seek full details of internal ventilation scheme to ensure the ventilation, ducting, filtration/treatment and ancillary equipment is incorporated as an integral part of the development.

Aspect, outlook and sense of openness

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

216. It is noted that majority of the bedrooms of the studios would be single-aspect. Where achieving dual aspect has not been feasible, opportunities have been taken where possible to provide these habitable rooms with two windows and 26 of the bedspaces being dual aspect including all the accessible studios.

217. For the reasons set out above, and recognising the site's Opportunity Area location and the attendant policy imperative to optimise density through a design-led approach, the outlook and sense of openness for all PBSA occupiers would be acceptable on balance.

Privacy

218. With regard specifically to preventing harmful overlooking of dwellings, the 2015 Technical Update to the Residential Design Standards SPD 2011 requires developments to achieve:

- a distance of 12 metres between windows on a highway-fronting elevation and those opposite at existing buildings; and

- a distance of 21 metres between windows on a rear elevation and those opposite at existing buildings.

219. The windows of the student bedspaces will be sited at least 14m away from the nearest Block G2 of phase 1 of the Tustin Estate renewal (currently under construction) on the opposite side of Ilderton Road. Given the urban context, no harmful overlooking is anticipated for any of the PBSA occupiers.

Wheelchair rooms

220. The Building Regulations make clear that student accommodation is to be treated as hotel/motel accommodation for wheelchair specification purposes. As such, Policy E10(H) is the relevant policy to apply in assessing compliance of PBSA wheelchair proposals, as has been clarified by GLA Practice Note 'Wheelchair Accessible and Adaptable Student Accommodation' dated November 2022. In respect of the 169 bedspaces proposed, 13 would be provided to M4(3) standards.

221. Representing 7.7% of the total number of bedspaces, the wheelchair unit provision would exceed the numerical requirements of Southwark Plan Policy P5. In locational terms, the units would also meet policy requirements, being provided across various floors. This would help achieve social integration.

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

Internal communal facilities

223. In addition to the private and shared spaces within the units themselves, a range of internal communal amenity spaces is proposed. These will be primarily located on the first floor and may include a gym, study space, games lounge, TV lounge, private dining area, and a tea/coffee station. Further communal spaces are planned at roof level, which could accommodate informal seating, communal dining, and social gatherings. These internal communal are proposed to provide space for occupiers to be social and active.

224. The size of these facilities and their distribution across the two buildings are summarised below:

Table 12: Internal communal facilities within the PBSA: Summary table		
Floor	**Facility**	**Size (sq. m)**
01	Student Amenity	160.6
Roof	Student Amenity	47.2
	Total:	**207.8**
	Average per PBSA bedspace:	**1.23**
Not included in calculation	*Back-of-house space including laundry facilities, toilets, storage, parcel store, reception/office etc.*	

225. As the above table shows, these internal communal amenity spaces would provide on average 1.23 square metres per student. While there are no prescriptive standards for internal communal space provision in PBSA schemes, this level of provision falls within the typical range observed across other student developments in London and within the borough, which varies from 0.77 to 1.74 square metres per student. Taking into account the site's size and shape, the proposed mix and size of student rooms, and the overall design quality, the level of proposed internal communal amenity space is considered acceptable on balance.

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



Image 16: *(from left to right): Layout of Levels 01, and roof of the building showing how the internal communal facilities would potentially be arranged*

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

Access to outdoor space

228. The proposed building will include a roof terrace exclusively for the student residents. The area of roof terrace is 60.9 m² which would be overlooked by the internal community amenity space. This outdoor amenity space would be equipped with seating, soft landscaping, boundary treatments and lighting (details to be secured by conditions). The submitted Wind Microclimate Report has demonstrated that the wind level within the roof terrace would be suitable for the intended use subject to mitigation measures (see also 'Wind microclimate' section). In addition, the applicant has agreed to contribute towards publicly open space in the OKR OA (See also 'Off-site (Old Kent Road Opportunity Area) public open space' section).



Image 17 (left): Aerial view of rooftop terrace and amenity space (Right): Roof plan - External amenity space and illustrative sketch of the internal amenity space

Conclusion on quality of residential accommodation – PBSA

229. The proposal would achieve good quality living accommodation for students. A range of room sizes and shared facilities is proposed, achieving overall acceptable levels of environmental comfort. There has been clear consideration of accessibility, and a financial contribution towards investment in nearby public open space would be secured.

230. For the reasons given above, the proposed PBSA would comply with London Plan Policy H15, while also meeting the four relevant criteria of Southwark Plan Policy P15.

Impact of proposal on development potential of nearby land

231. Southwark Plan Policy P18, which is concerned with the efficient use of land, states that development will be permitted where it would not unreasonably compromise development potential or legitimate activities on neighbouring sites. Given the current proposal is within the building envelope of the extant permission 20/AP/3560, it is considered that the proposal would not unreasonably compromise development potential or legitimate activities on neighbouring sites

Amenity impacts on nearby residential occupiers and the surrounding area

232. The importance of protecting neighbouring amenity is set out in Southwark Plan Policy P56, which states “development should not be permitted when it causes an unacceptable loss of amenity to present or future occupiers or

users". The 2015 Technical Update to the Residential Design Standards SPD 2011 expands on policy and sets out guidance for protecting amenity in relation to privacy, daylight and sunlight.

Daylight and sunlight

233. The NPPF sets out guidance with regards to daylight/sunlight impact and states "when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site". The intention of this guidance is to ensure that a proportionate approach is taken to applying the BRE guidance in urban areas. London Plan Policy D6 sets out the policy position regarding this matter and states "the design of development should provide sufficient daylight and sunlight to new and surrounding houses that is appropriate for its context". Policy D9 states that daylight and sunlight conditions around tall building(s) and the neighbourhood must be carefully considered. Southwark Plan policies identify the need to properly consider the impact of daylight/sunlight without being prescriptive about standards.

234. The BRE Guidance sets out the rationale for testing the daylight impacts of new development through various tests. The first and most readily adopted test prescribed by the BRE Guidelines is the Vertical Sky Component assessment (VSC). This test considers the potential for daylight by calculating the angle of vertical sky at the centre of each of the windows serving the residential buildings which look towards the site. The target figure for VSC recommended by the BRE is 27%, which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE have determined that the daylight can be reduced by approximately 20% of the original value before the loss is noticeable.

235. The second method is the No Sky Line (NSL) or Daylight Distribution (DD) method, which assesses the proportion of the room where the sky is visible, and plots the change in the No Sky Line between the existing and proposed situation. It advises that if there is a reduction of more than 20% in the area of sky visibility, daylight may be affected.

Properties assessed for daylight impacts

236. The proposed development sits within the same envelope as the extant scheme 20/AP/3560, with minor changes in massing limited to a small reduction in parapet height and changes to rooftop plant. Therefore, the impact of the development on daylight and sunlight amenity to neighbouring properties will be almost identical to that of the extant scheme 20/AP/3560 which were considered acceptable.

237. However, Block G1 of Phase 1 of the Tustin Estate Renewal opposite the site is now nearly completed since the extant scheme was assessed. In accordance with the BRE guidelines, a daylight, sunlight and overshadowing

(DSO) assessment has therefore been undertaken to assess the extent to which the proposed development would affect all the dwellings. The properties were tested for VSC and NSL impacts, but not illuminance as this method is more appropriately applied to new buildings.

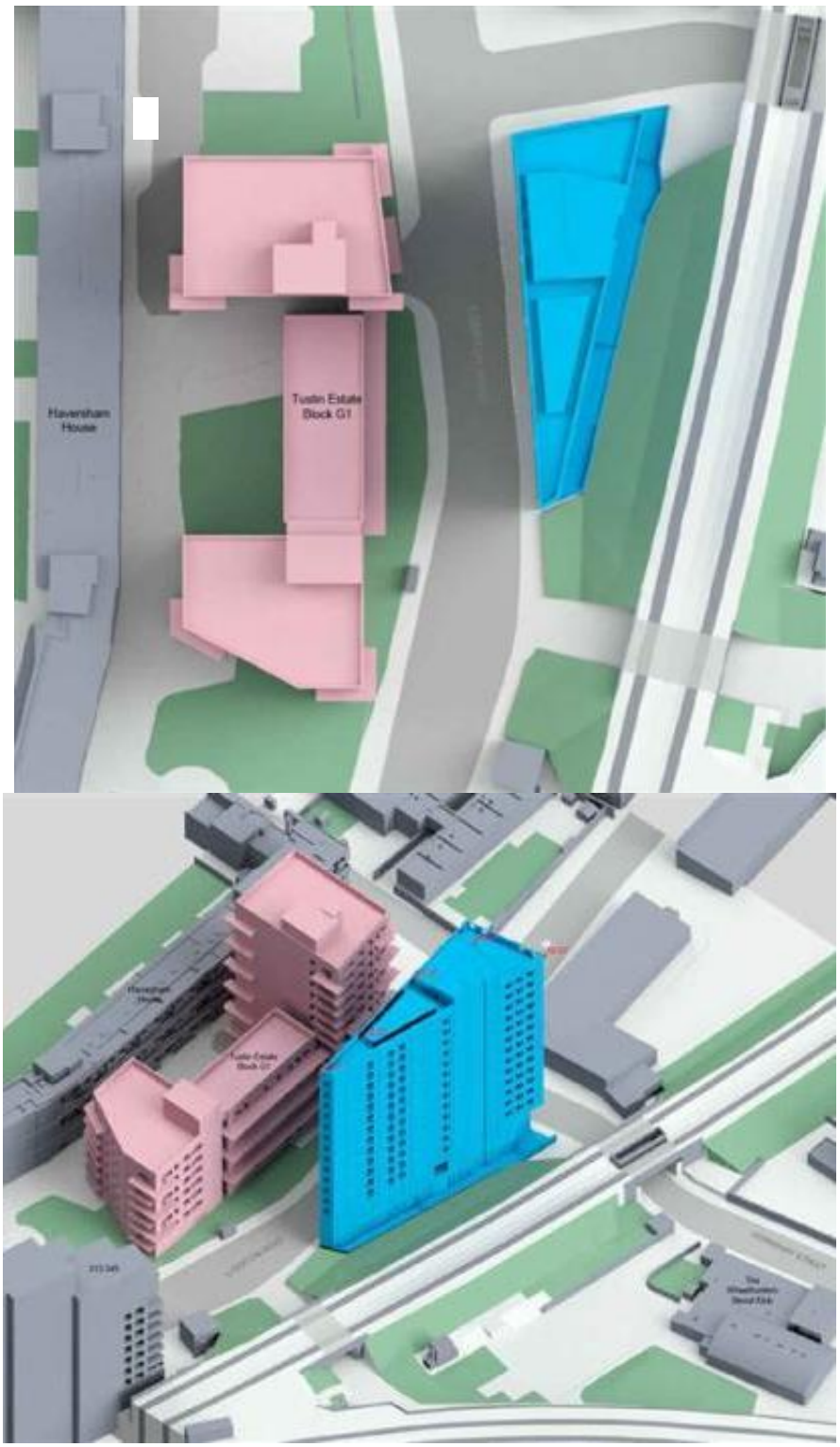


Image 18 (top to bottom): Proposed plan view *(left) and 3D view of the development within its existing context (right). The proposed development is coloured in blue and Block G1 of Tustin Estate Renewal is coloured in pink*

VSC and NSL impacts for sensitive surrounding residential properties

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

Table 13: VSC impacts to surrounding properties				
Residential Property	**Number of windows that would experience a VSC reduction (as a percentage of the baseline VSC value)**			
	No loss or a loss of up to 19.9%	**20%-29.9% (minor adverse impact)**	**30%-39.9% (moderate adverse impact)**	**40% + (substantial adverse impact)**
Heversham House, Tustin Estate (to be demolished in Phase 2 of renewal)				
Total no. habitable windows tested: 87				
• Of the 87 windows, 87 would retain a VSC of 27% or more.				
Proposed vs existing	**0**	**0**	**0**	**0**
Block G1, Tustin Estate (Near completion in Phase 1 of the renewal)				
Total no. habitable room windows tested: 190				
• Of the 190 windows, 51 would retain a VSC of 27% or more. • For the 139 that would not, the distribution of percentage reductions is:				
Proposed vs existing	**26**	**1**	**3**	**109**
313-327 Ilderton Road				
• Total no. habitable room windows tested: 42 • Of the 42 windows, 42 would retain a VSC of 27% or more.				
Proposed vs existing	**0**	**0**	**0**	**0**

239. The table below summarises the NSL (also known as ‘daylight distribution’) impacts to surrounding properties as a result of the proposed development being built-out in the present day context.

Table 14: NSL impacts to surrounding properties				
Residential property	**No. windows that would experience a reduction in NSL (as a percentage of the baseline NSL value)**			
	No loss or a loss of up to 19.9%	**20%-29.9% (minor adverse impact)**	**30%-39.9% (moderate adverse impact)**	**40% + (substantial adverse impact)**
Heversham House, Tustin Estate (to be demolished in Phase 2 of renewal)				
Total no. habitable rooms tested: 84				
Proposed vs existing	73	**4**	**3**	**4**
Block G1, Tustin Estate (Near completion in Phase 1 of the renewal)				
Total no. habitable rooms tested: 112				
Proposed vs existing	49	**3**	**7**	**53**
313-327 Ilderton Road				
Total no. habitable rooms tested: 14				
Proposed vs existing	14	**0**	**0**	**0**

Heversham House, Tustin Estate

240. None of the windows assessed at Heversham House would undergo any noticeable loss of VSC.

241. In terms of the second daylight assessment, the NSL, the results record 4 rooms assessed would undergo severe loss of NSL. 2 of these rooms are bedrooms which tend to be less daylight reliant. The 2 living/dining/kitchen rooms adversely affected are located on the ground and second floors. 4 and 3 habitable rooms would undergo a minor adverse and moderate adverse reduction in NSL respectively.

242. It must acknowledge that the proposed scheme remains within the building envelope of the extant permission 20/AP/3560, and Heversham House will be demolished as part of the Phase 2 Tustin Estate renewal.

243. For these reasons, whilst it is acknowledged that the proposed development would result in some reduction in daylight to some occupiers of the Heversham House, the proposed development has been designed to minimise the impacts on these properties whilst optimising the site capacity of the brownfield land to deliver a mixed-use development. On balance, it is therefore considered that the impacts on these occupiers would be acceptable.

Block G1, Tustin Estate

244. 7 and 1 of the windows assessed at Block G of the Tustin Estate would undergo minor and moderate noticeable loss of VSC respectively.

245. In terms of the second daylight assessment, the NSL, the results record 53 rooms assessed would undergo severe loss of NSL. 30 of these rooms are bedrooms which tend to be less daylight reliant. The 23 kitchen or living/dining/kitchen rooms adversely affected are mostly located 1) within the recessed central section of the building or 2) adjacent to the balconies where the daylight is already restricted by the projecting two wings of the same building, the walkways above or balconies of the same building. These rooms are dual aspect which would help alleviate the impacts. 4 and 3 habitable rooms would undergo a minor adverse and moderate adverse reduction in NSL respectively.

246. Overall, given the extant permission (20/AP/3560), would leave these apartments with similar levels of daylight and sunlight amenity. On balance, the effect of the development on this building is considered acceptable.

313-327 Ilderton Road

247. All the windows and rooms tested comply with the BLE guidelines so the effects of the proposed development would not be harmful to the amenity of the occupiers of 313 – 327 Ilderton Road

Sunlight

248. The applicant's DSO report has assessed the impact of the proposed development on the sunlight received at all windows facing within 90 degrees of due south. The BRE guide states that nearby windows must be assessed using the three-stage process set out below to determine if, as a result of the development, the sunlight levels would reduce to an extent that the room may feel colder and less pleasant.

249. The first stage is to determine if the window would experience:

- a reduction in sunlight to less than 25% Annual Probable Sunlight Hours (APSH); or
- a reduction in sunlight to less than 5% Winter Probable Sunlight Hours (WPSH); or
- both of the above.

250. If one of the above criteria is triggered, the next stage is to determine if:

- the window's resulting APSH is less than 0.8 times its former value; or
- the window's resulting WPSH is less than 0.8 times its former value; or
- both of the above.

251. Where one of the criteria in Stage 2 is met, the final stage is to determine if the overall loss of sunlight across the whole year would reduce by more than 4% of APSH.

252. The 3 properties assessed for daylight impacts have also been assessed for sunlight impacts. No breaches of the BRE guidelines were recorded for 313-327 Ilderton Road and Heversham House.

253. 44 of the habitable rooms in Block G1 of Phase 1 of the Tustin Estate Renewal will experience a reduction in APSH in excess of the BRE guidance serve a bedroom and a living room. 18 of them are kitchen or living/kitchen/dinning area with a retained APSH ranging between 6 to 24.

Conclusion on daylight and sunlight

254. In total, the development would result in 1 minor, 3 moderate and 109 substantial adverse reductions in VSC for surrounding properties. With respect to NSL, among the properties assessed, there would be 53 substantial reductions for habitable rooms at Block G1 of Tustin Estate which is near completion. These exceedances of the BRE guidance, and the negative impact they would have on neighbour amenity, should be given some weight in determining the application.

255. Regarding sunlight, 44 of the habitable rooms in Block G1 of Tustin Estate would experience impacts beyond the recommendations of the BRE.

256. The proposed development remains within the building envelope of the extant permission 20/AP/3560. The hybrid planning application for the Tustin Estate renewal was approved in 2022 after the expired permission 18/AP/2761 for 12 storeys building was granted so Block G1 has been designed and assessed with the development of 301-303 Ilderton Road in mind. Furthermore, given site's location within the Old Kent Road Opportunity Area, where more intensive development is expected and where the BRE guidelines should be applied flexibly following the design-led approach to density promoted by the London Plan, the impacts are on balance acceptable. As noted above, the BRE guidelines are not mandatory and the advice within the guide should not be seen as an instrument of planning policy. While some noticeable relative changes in daylight amenity would occur at a number of residential properties surrounding the site, the retained daylight levels would be commensurate with those typical to other Growth and Opportunity Areas across London. There are also a large number of residential properties surrounding the application site that will satisfy the recommendations of the BRE Guidance in that they will not experience any noticeable alterations in daylight or sunlight as a result of the implementation of the proposed development.

Overshadowing

257. There are no amenity spaces in close vicinity to the proposed development

Outlook and sense of enclosure

258. The site is located within the Old Kent Road Opportunity Area, where there is an expectation for greater densities and taller buildings to come forward, changing the urban grain of the locality. The proposed development would introduce to the site a tall building of 15 storeys which would be the same as the extant permission 20/AP/3560. Hence, views 'through' would be possible, opening up views of the sky for residents of the existing nearby dwellings. Incorporation of high quality materials throughout the development would give complexity and visual relief to building forms, which would have a positive effect on the surrounding properties' outlook. As such, it is not considered that any of the surrounding dwellings that look towards the site would experience a harmfully diminished quality of outlook or sense of openness as a result of the proposed development.

Privacy

259. With regard specifically to preventing harmful overlooking of dwellings, the 2015 Technical Update to the Residential Design Standards SPD 2011 requires developments to achieve:

- a distance of 12 metres between windows on a highway-fronting elevation and those opposite at existing buildings; and
- a distance of 21 metres between windows on a rear elevation and those opposite at existing buildings.

260. All the 'across street' distances between the development and habitable residential rooms opposite would exceed 12 metres. The closest distance between the proposed development and any neighbouring residential building is 14 metres (to the flatted development at Block G1 of the Tustin). In summary, since the guidelines of the Residential Design Standards would be achieved, no privacy infringement issues are raised.

Management and maintenance of the PBSA

261. The Council's 2015 Technical Update to the Residential Design Standards requires student housing proposal to be accompanied by details of the long-term management and maintenance arrangements of the student accommodation, including details of security. This is in the interests of ensuring that, once operational, the development:

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

262. The PBSA units will be owned by the applicant and managed by Homes for Students. A Draft Management Plan has been submitted in support of the planning application, which sets out how the proposed development will be managed and maintained. With regard to the management of the scheme, the Draft Management Plan makes the following main provisions:

- Anti-social behaviour:
  - comprehensive log of incidents reported during any 24hr period by fellow student residents, identified following review of CCTV on site or following complaints from neighbours and/ or local residents
  - Take part in local residents meetings to gather feedback and ensure regular two-way communication between residents and Homes for Students.
  - Local residents will be provided with the contact details for the property and the 24hr Help Desk in the event they experience issues requiring immediate attention

- Security
  - CCTV cameras in and around the building will be fed back to the management office to allow monitoring of incidents and potential incidents;
  - There will also be an electronic access control system to prevent unauthorised access into the flats; and
  - mobile Security Service, provided by a local security company will be contracted for the site who will provide onsite out of hours service to the students.

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

Noise and vibration

Plant noise

264. A plant room would be contained within the ground of the building. There would also be rooftop plant albeit the full details of plant are not currently known.

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

Public noise nuisance

266. In terms of public noise nuisance from the development for surrounding residents, a Student Management Plan will be secured through the Section 106 Agreement to ensure the operation of the PBSA would limit sources of human noise disturbance to neighbours.

267. The only other potential sources of public noise nuisance are the proposed light industrial units (Use Class E(g)(iii)) In order to limit any risk of public noise nuisance, it is recommended that opening hours limitations be imposed on these non-domestic units as follows:
    - 07:00-23:00 on Mondays to Sundays (including Bank Holidays).

268. As per the extant permission (20/AP/3560), a separate condition is proposed to control the hours of servicing/deliveries to these non-domestic uses as follows:
    - 06.00 to 22.00 on Monday to Saturdays; and
    - 10.00 to 18.00 on Sundays and Bank Holidays.

Vibration

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

Odour

Extraction and ventilation equipment

270. Since there is a potential for the proposed light industrial units as commercial kitchens under general permitted development rights. For safeguarding purpose, upon the request from the Environmental Protection Team, a standard condition is also recommended to details of any extraction and ventilation system if such use arises.

Design

271. Paragraph 56 of the NPPF stresses the importance of good design, considering it to be a key aspect of sustainable development. Chapter 12 of the NPPF is the key national policy for design. In particular para 134 requires development to reflect local and national design policies, guidance and SPDs. It sets out that outstanding or innovative design should be given significant weight in decision making, and requires development that is not well designed to be refused.

272. Chapter 3 of the London Plan deals with design related matters. Policy D3 promotes a design-led approach to making the best use of land. Policies D4 and D8 build on this, setting out the design principles for ensuring new development makes a positive contribution in terms of architecture, public

realm, streetscape and cityscape. Policy HC1 advises that development affecting heritage assets and their settings should conserve their significance by being sympathetic in their form, scale, materials and architectural detail.

273. London Plan Policy D9 is specifically concerned with tall buildings. The policy contains a list of criteria against which to assess the impact of a proposed tall building – namely locational, visual, functional, environmental and cumulative. London Plan Policy D4 requires all proposals exceeding 30 metres in height to have undergone at least one design review or demonstrate that they have undergone a local borough process of design scrutiny. The proposed building would, at 53.89 metres above ground level, exceed the 30 metre threshold. It thus engages Policy D9.

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

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

275. Specifically for tall buildings, Policy P17 requires:

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

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

- be of exemplary design and quality;
- conserve and enhance designated heritage assets and make a positive contribution to the wider townscape;
- avoid harmful environmental impacts;

- maximise energy efficiency; and
- have a positive relationship with the public realm, provide opportunities for new street trees, design lower floors to successfully relate to and create positive pedestrian experience, provide wider footways and accommodate increased footfall.

277. There are no conservation areas and listed buildings in the vicinity of the application site, and the draft OKR AAP identifies buildings of townscape merit and architectural or historic interest nearby. The draft AAP identifies the cluster as an appropriate for a mix of Tier 1 (above 20 storeys), Tier 2 (16 to 20 storeys) and Tier 3 (up to 15 storeys) tall buildings.

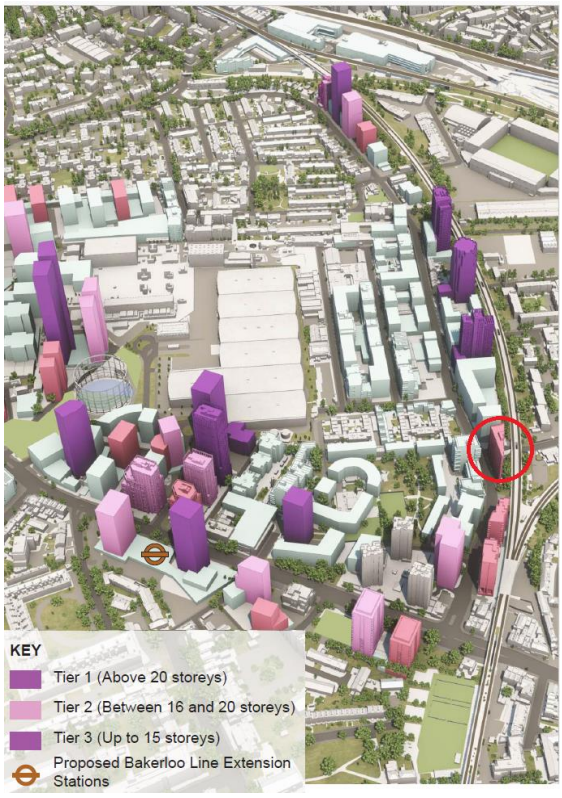


Image 19: *(right): The Stations and The Crossings strategy from the draft Old Kent Road AAP, showing the distribution of tall buildings across the action area, including cluster at the new tube station where the site is located (circled in red), and these tall buildings' relationship to London and borough views.*

Site layout and public realm

278. The existing urban grain is varied, featuring a mix of housing dating from various eras and in a range of formats and heights; and larger commercial warehouses. As previously mentioned, the application site is brownfield land within the Old Kent Road Opportunity Area. It is also subject to site allocations in the Southwark Plan and draft OKR AAP.

279. Characterised by a low-rise building, large areas of surface parking and high palisade fencing, the existing site makes no meaningful contribution to Ilderton Road or Sharratt Street.

280. The proposed development in this application is a single block, optimising the entire site. The ground floor layout would have main entrances of both PBSA and commercial units from the Ilderton Road frontage, but would also have active frontage on Hornshay Street with the full double height commercial glazed façade at the north-east corner of the building.

281. The eastern side of the ground floor of the proposed building would face the railway embankment and as such is mainly used as the location of servicing for the commercial element as well as access for the cycle storage to the

rear. This would be away from the PBSA entrance on Ilderton Road and is supported.

282. Following the request from the officer, the ground floor PBSA entrance would be opened out and set back by a metre, in order to create a more generous approach to the lobby.

283. In summary, the proposed site layout is broadly similar to the extant permission 20/AP/3560. It is a logical response to the shape of the site providing improved frontages along the Ilderton Road and Hornshay Street

Height, scale, massing and tall building considerations

284. The Site benefits from an extant planning permission 20/AP/3560 for 15 storeys, and this proposal falls within the same massing. The height and massing of the building has previously been through design review and was found to be acceptable. There is no change with the height of the building in this application.

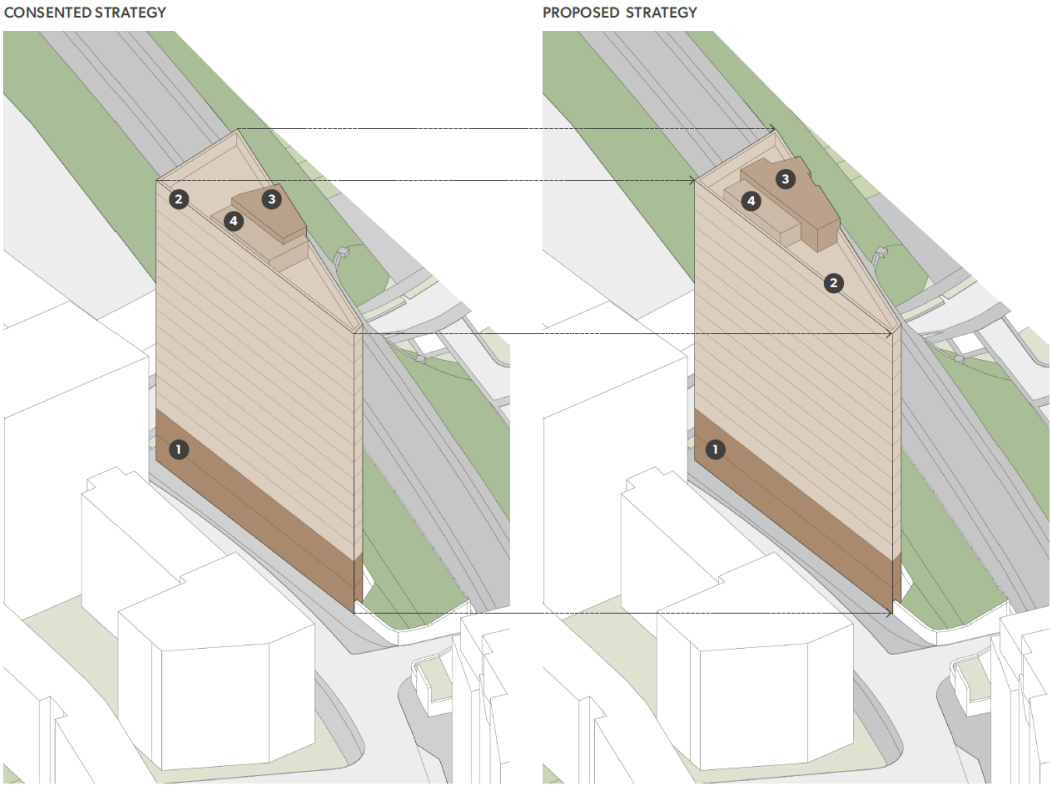


Image 20: Comparison of the massing between the extant planning permission 20/AP/3560 (left) and this application 24/AP/3819 (right)

285. The proposed development, with its 15 storeys, falls within the acceptable range for Tier 3 tall buildings in the Old Kent Road Opportunity Area. Immediately to the south of the proposal, the buildings at 313-349, is between 11 to 15 storeys high (no.4 in the image below). To the west, as part of the Tustin Renewal, new buildings are between 21 storeys to 13 along Ilderton Road (no.3 in the image below). It is considered that the

proposed height at 301-303 Ilderton Road would remain compatible with the emerging townscape and heights of buildings.



Image 21: Emerging context.

286. The proposed tall building will not harm any designated London-wide or local protected views, including the Protected Vista of St. Paul's Cathedral. This has been demonstrated through a townscape and visual impact assessment and additional wireframe visualisations.

287. Overall, and having taken account of the effects arising cumulatively with other existing, consented and planned tall buildings nearby, and no substantial changes to height and massing in the extant permission 20/AP/3560, the development's design would be exemplary, thereby meeting the policy criteria for a new tall building.

Architectural design and treatment

288. Southwark Plan Policy P14 sets out the criteria for securing high quality design. In respect of architectural design and materials the policy requires all developments to demonstrate high standards of building fabric, function and composition. Design solutions should be specific to the site's historic context, topography and constraints. They should also respond positively to the context using durable, quality materials that are constructed and designed sustainably to adapt to the impacts of climate change.

289. The proposed scheme has introduced a design that seeks to reference the historic industrial use of the area. The proposed windows would align so that there would be a vertical emphasis. Brick pilasters run down the elevation to provide articulation and further verticality. Brick arches on the ground and first floor elevation would reference the railway to the rear of the site. The ground and first floor levels would have floor-to-ceiling height under the arches providing that active frontage along Ilderton Road and Hornshay Street. The fenestration and the brick arch would have sufficient depth of a full brick to allow for visual interest. Following officers' request, the southern section of the tower facade has also been further improved with the use of glazed sawtooth bricks which would add visual interest on the southern approach from Old Kent Road.



***Image 22** (above): View of student entrance on Ilderton Road (left) and view of the west and south building facades (right)*

290. The rear elevation (facing the railway) would also have a regular vertical arrangement and a recess down the core, which provides for a visual break. This elevation is also important as it is clearly visible from afar and along the railway line.

291. The materials used in this development would predominantly be brick with concrete lintels above the windows. The main brick would be light buff coloured and the ground floor with a small element of engineering brick used on the ground floor. The materials shown indicatively at this stage are high quality and robust, such that officers have confidence the appearance and architectural integrity of the building would be sustained through its lifespan.

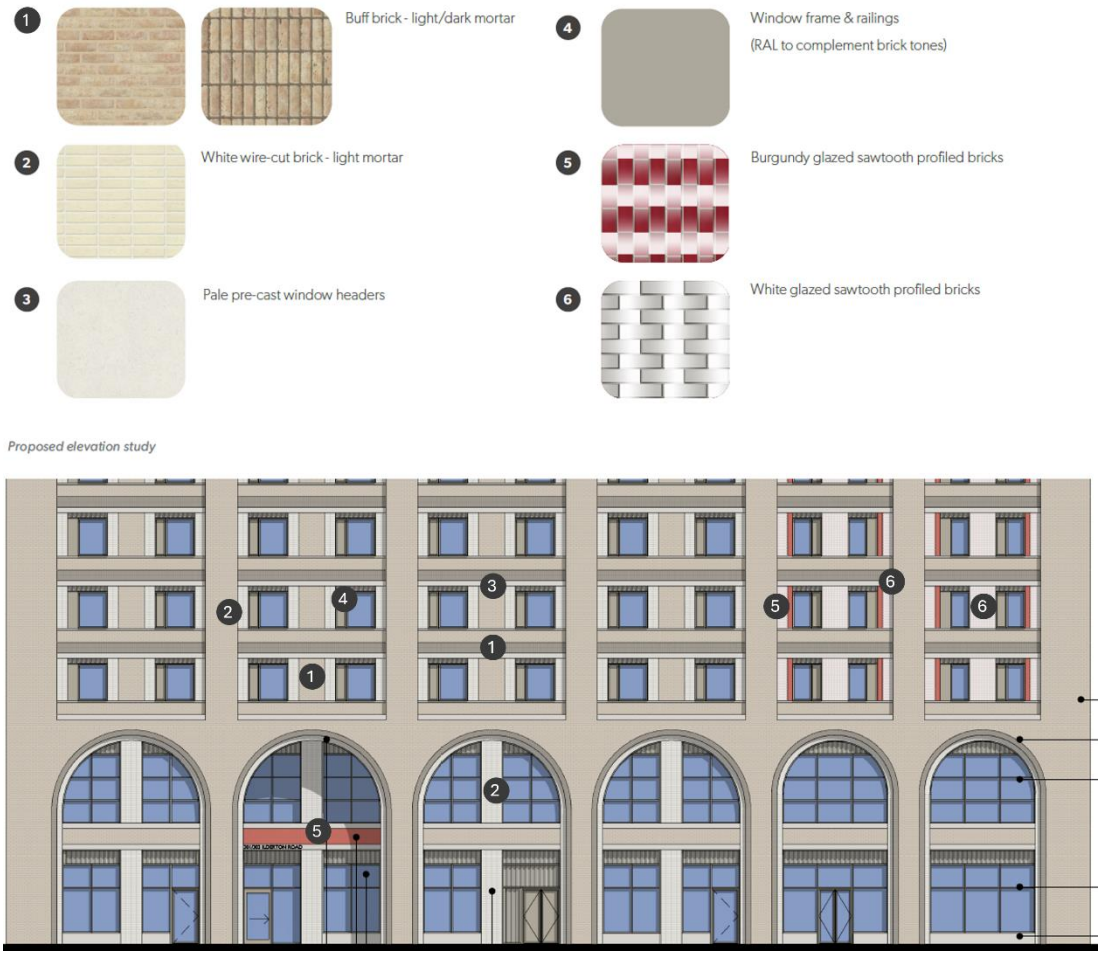


Image 23 *(above): Proposed materials*

292. To ensure the texture and interest of the elevational designs are carried through to the as-built scheme, conditions are recommended requiring sample panels of each material (including, in the cases of the bricks, the bond and mortar), as well as samples of the window and door frames.

293. Large scale bay studies have been provided with the submission to demonstrate design quality. Notwithstanding, a full set of detailed drawings will be secured by condition to ensure the delicate qualities and depth of the facades depicted in the application-stage drawings materialise in the as-built scheme. Additional to this, a condition is recommended requiring full scale mock-ups of the façade panels of the building to be built on site and presented for officers' approval. Compliance conditions will also ensure no instatement of telecommunications equipment, other roof plant and structures and appurtenances without the Council's approval in order to safeguard the integrity of the design.

294. Overall, and with the abovementioned planning conditions enabling to officers to retain control over the detailed resolution, the proposal would achieve an exemplary quality of architectural design.

Heritage and townscape impact

Statutory designated heritage assets

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

Table 15: Conservation areas within 1km of the application site	
Conservation Area	**Distance from Application Site**
Caroline Gardens Conservation Area	Approximately 430m
Kentish Drovers and Bird in Bush Conservation Area	Approximately 430m
Livesey Conservation Area	Approximately 600m

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

Non-designated heritage assets

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

Table 16: Draft AAP Building or Feature of Townscape Merit within the immediate vicinity of the site:	
Property	**Description**
209-225 Ilderton Road	Building of Townscape Merit
Penarth Centre, 30 Penarth Street	Building of Townscape Merit
Christ the King Chapel, 8 Manor Grove	Building of Townscape Merit

Townscape and Visual Impact Assessment (TVIA)

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

London Strategic views

299. The London View Management Framework (LVMF) (March 2012) identifies a number of strategic views that are sensitive to change and require careful management if they are to be protected and enhanced. The types of strategic view are: London Panoramas; Linear Views; River Prospects; and Townscape Views. LVMF 2A.1 Parliament Hill: the summit (looking toward St Paul's Cathedral) is potentially sensitive to development at the application site, and as such the TVIA has tested the impact of the proposed development within this view.

300. It has been established that in the extant permission 20/AP/3560 that a 15-storey height and massing at this site would not result in any harm to designated London wide or local protected views, including the Protected Vista of 2A.1 of the London View Management Framework, which protects views from Parliament Hill Summit to St. Paul's Cathedral. The proposal in this application has broadly the same height and massing as the extant permission 20/AP/3560.

Borough views

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

Designated Heritage Assets

302. With the exception of the Caroline Gardens Conservation Area (which would not be affected and is identified as having limited intervibility with other areas by the Conservation Area Appraisal). The Grade II Listed Gas works, Kentish Drovers and Bird in Bush Conservation Area and Livesey Conservation Area would also have limited visibility towards the site and the key 'townscape views' identified in the Conservation Area Appraisals are not directed towards the site.

Non-designated heritage assets

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

Conclusion on heritage and townscape impact

304. There would be no harm to heritage assets. The scheme is therefore considered to be acceptable in respect of heritage matters.

Inclusive access

305. Policy D3 of the London Plan states that measures to design out crime should be integral to development proposals and be considered early in the design process. Developments should ensure good natural surveillance,

clear sight lines, appropriate lighting, and logical and well-used routes. Policy P16 of the Southwark Plan reinforces this and states that development must provide clear and uniform signage that helps people wayfind and effective street lighting to illuminate the public realm.

306. The various inclusive access measures within the proposal would include:

- all uses to have step-free access through flat finished floor levels or lift arrangements;
- lift access to be provided to all levels within the building; and
- cycle storage provision to allow for larger cycles such as cargo cycles, purpose built cycles for disabled people and tricycles

Designing-out crime

307. 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.

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

- creating well lit routes and spaces with good sight lines, creating opportunities for natural surveillance in so doing;
- designing-out alcoves, secluded areas and other spaces for anti-social behaviour; and
- designing all cycle store room to be open-plan, well-surveilled and secure.

309. It is noted that Metropolitan Police requested a financial contribution towards equipping staff and police vehicles to meet this increased demand without straining existing resources and compromising service levels. However, officers consider that the requested contribution is not justified and would not meet the three tests set out Community Infrastructure Levy Regulation 122. The detailed explanation is set out in paragraph 502 below.

310. The imposition of a two-part 'Secured by Design' condition is recommended. This would ensure Secured by Design certification is ultimately achieved which would help reduce the need on the policing.

Conclusion on design

311. The proposal in this application stays within the building envelope of the extant permission 20/AP3560. It remains consistent with the tall buildings policy of the draft AAP. Following the engagement with council officers, the Applicant has also amended the scheme to add architectural interest to the building. The proposal meets the Southwark Plan and London Plan tall building tests, and overall it is considered that the scale and massing of the

proposal can be accommodated without undue harm to the established townscape. Throughout, robust and high quality finishes are proposed. To ensure high quality execution, sample materials, detailed section drawings and mock panels will be required by condition.

312. Having applied the statutory tests as set out in the Planning (Listed Buildings and Conservation Areas) Act 1990 and the requirements of the NPPF, it is considered that the proposal would conserve and enhance the significance of designated and non-designated heritage assets and would make a positive contribution to the wider townscape character. The proposed development would also make efficient use of land, optimise density and contribute towards creating beautiful and sustainable places, in accordance with NPPF paragraphs 122 to 125, London Plan Polices GG2 and D3, and Southwark Plan Policy P18.

313. Inclusive design and crime minimisation considerations have all been resolved to an acceptable level of detail.

314. For the reasons given above, it is considered that an acceptable quality of design would be achieved.

Public realm, landscaping and trees

315. London Plan Policy G7 and Southwark Plan Policy P61 recognise the importance of retaining and planting new trees wherever possible within new developments. London Plan Policy G5 requires major development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

316. As set out in the draft Old Kent Road AAP, all new development must deliver 5 square metres of public open space per proposed dwelling (including student housing). As prescribed by the draft AAP indicative masterplans, sites are identified as providing public open space either:

    a) all on site; or
    b) some on site, some off-site; or
    c) all off-site.

317. In scenario b), the total quantum of on-site public open space proposed by the planning application can be deducted from the 5 square metre per dwelling financial contribution requirement. Where a site is required to make a public open space financial contribution, the £325 per square metre tariff specified in the Council's S106 and CIL SPD should be applied.

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

318. The proposal hereunder consideration would deliver the equivalent of 67.6 dwellings, producing a requirement for 338 square metres of public open space.

319. This yield cannot be delivered as part of the proposed development due to the constrained nature of the plot. Applying the £325 multiplier, this generates an in-lieu contribution of **£109,850** (index linked) which would be secured through an obligation in the Section 106 Agreement.

Trees

320. There are no existing trees on the site. The adjacent railway embankment trees could be appropriately pruned as proposed without loss of amenity. A condition has been attached to ensure the compliance to the tree protection measures. The applicant had previously agreed to pay a contribution of £3,000 per tree for planting elsewhere in the opportunity area or planting in the new park space to the north. It is considered appropriate to secure the same obligation.

Landscaping

321. The site is small and has an irregular shaped plot, which makes it difficult to provide new publicly accessible open space. The development optimises the site to ensure that it can viably delivered.

322. Whilst there would be limited landscaping proposed at ground level, the applicant would landscape the roof level to provide an attractive amenity area for the future students. This comprises intensive green roofs with planting. Hard and soft landscaping and tree planting details shall be secured via a condition to ensure that the right species of planting are appropriate.



Image 24 *(above – from left to right): Ground floor, 15th floor and roof plans showing the landscaping arrangement*

Green infrastructure, ecology and biodiversity

323. Policy G5 of the London Plan states that urban greening should be a fundamental element of site and building design. It requires major developments that are predominantly commercial to achieve an Urban Greening Factor (UGF) score of 0.3 and those that are predominantly residential to achieve a score of 0.4. The scheme proposed by 24/AP/3819 falls within the latter category.

324. The Environment Act 2021 introduced a requirement for planning applications to deliver biodiversity value 10% in excess of the pre-development biodiversity value of the on-site. This is known as 'Biodiversity Net Gain' (BNG). The Act requires planning authorities to secure the BNG value delivered by the development through an appropriate planning mechanism for a minimum duration of 30 years.

325. London Plan Policy G6 requires development proposals to manage impacts on biodiversity and secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process. Southwark Plan Policy P60 seeks to enhance populations of protected species and increase biodiversity net gains by requiring developments to include features such as green and brown roofs, green walls, soft landscaping and nest boxes. Southwark Plan Policy 59 requires major development to provide green infrastructure with arrangements in place for long-term stewardship and maintenance funding.

Urban greening

326. The site at present would score 0 as it is covered by a building and a sealed concrete surface. The proposal would achieve a UGF score of 0.33 through a combination of these principal elements:

- 19 square metres of intensive green roof with substrate of minimum settled depth of 150mm
- 207 square metres of extensive green roof;
- 30.4 square metres of hedges; and
- 139 square metres of permeable paving

327. This is deemed to be the maximum achievable UGF score given the following constraints:

- providing functional pedestrian / maintenance uses requires the provision of hard surfaces for both PBSA and commercial uses in a triangular shaped small site;
- roof areas have been maximised for use of services equipment to deliver the required Energy Strategy, resulting in reduced possibilities of green/brown roofs on the tops of the buildings.

328. Whilst this is below the target of 0.4, it should be noted that this is a target and the 0.33 is an improvement from what currently exists on site. The UGF achieved in this application is higher than 0.27 achieved in the extant permission 20/AP/3560. Given the small plot, it would be difficult to achieve the 0.4. A two-part condition will be imposed to ensure the development is built-out to achieve the 0.33 UGF.

Ecology

329. The site is adjacent to the Senegal Railway Banks Site of Importance for Nature Conservation (SINC) which is located in the London Borough of Lewisham.

330. A Preliminary Ecological Appraisal and Preliminary Roost Assessment were carried out. Buildings affected by the proposed development have negligible value for roosting bats. Subject to bat friendly lighting strategy to avoid increased light spill onto the adjacent SINC (to be secured by a condition), the proposed development would not result in negative impacts on the foraging or commuting bats. No other impacts on designated sites, habitats, flora and wildlife are identified subject to a Construction Environmental Management Plan which would ensure invasive species found onsite and described within the Preliminary Ecological Appraisal would be removed and disposed of following appropriate guidelines.

331. Some buffer planting has been proposed. A native planting condition has been recommended to ensure it comprise native and pollinator friendly shrub and herbaceous planting including the use of nectar-rich and berry producing plants. Larger shrubs should be under-planted to create greater structure and cover for wildlife. Where space for this is limited such as in the service yard area, a trellis with pollinator friendly climbing plants is recommended.

Biodiversity

332. There are currently four statutory exemptions and transitional arrangements which mean that the mandatory Biodiversity Gain condition does not always apply.

333. The proposed development i) does not impact an onsite priority habitat (a habitat specified in a list published under section 41 of the Natural Environment and Rural Communities Act 2006); and ii) impacts less than 25 square metres of onsite habitat that has biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat (as defined in the statutory metric). The proposed development therefore is below the de minimis threshold, hence is exempted from Mandatory Biodiversity Net Gain requirements.

334. In accordance with Southwark Plan policy P60, the development is still required to deliver increased biodiversity onsite. This proposal has achieved this by providing planters and green roofs which would result in an uplift of 0.05 habitat units.

Conclusion on urban greening, ecology and biodiversity

335. The site in its current condition is of little or no ecological value. The Council's Ecologist has confirmed no objection. Any ecological impacts of the development would be mitigated, in compliance with Policies P59 and P60 of the Southwark Plan. Redevelopment offers the opportunity to enhance biodiversity opportunities. The provision of urban greening is welcomed, with conditions to secure the provision of features within the building fabric to support local biodiversity (6 Swift nesting bricks, 4 bat bricks/tubes, native planting details (as part of the hard and soft landscaping scheme), a Landscape & Ecological Management Plan and biodiverse roofs details. A two-part condition will be imposed to ensure the development is built-out to achieve the 0.4 UGF score.

Archaeology

336. The site is located within the 'North Southwark and Roman Roads' Tier 1 Archaeological Priority Area (APA), which is designed to protect the palaeological environment and prehistoric archaeology recovered from the shoreline and relict fills of the large Late Glacial Bermondsey Lake and the associated riverine geology and topology. Places within the borough that fall within the APA at Tier 1 is the highest level of APA indicating that there is a significant potential for archaeological remains of significance to be present within the defined area. In this case, Roman remains associated with Roman settlement and cemeteries, as well as the alignment of Old Kent Road along the southern side of the site which is believed to follow the course of a major Roman Road, Watling Street.

337. Policy P23 of the Southwark Plan 2022 requires that applications affecting sites within APAs should be accompanied by an archaeological assessment and a report on the results of a field evaluation of the site, including an assessment of the impact of the proposed development on the archaeological resource. Whilst the submitted a desk-based assessment is out of date, and the submitted archaeological evaluation Written Scheme of Investigation (WSI) does not have an adequate coverage of the site for trenching, the Council's archaeologist has confirmed that there is sufficient information to establish that the development is not likely to cause such harm as to justify refusal of planning permission. This is provided that conditions are applied to any consent securing a programme of archaeological evaluation with a revised WSI and mitigation, a detailed scheme showing the complete scope and arrangement of the basement and foundation design, and all associated subterranean groundworks, and a post archaeological work report. A S106 contribution for the archaeological monitoring has also been agreed.

Transport and highways

Healthy Streets

338. London Plan Policy T2 requires development proposals to demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with TfL guidance. These indicators are intended to inform design, management and use of public spaces in order to place people and people's health at the forefront of development decisions.

Enhancements to the pedestrian and cycle environment on-site

339. Access to the site is currently provided via three separate crossovers along its western boundary on Ilderton Road. As part of the Cycle Future Route 12 (CFR12) scheme, a new pedestrian and cyclist crossing is proposed at the junction of Ilderton Road and Hornshay Street. This requires the removal of the northernmost crossover and associated vehicular access on Ilderton Road.

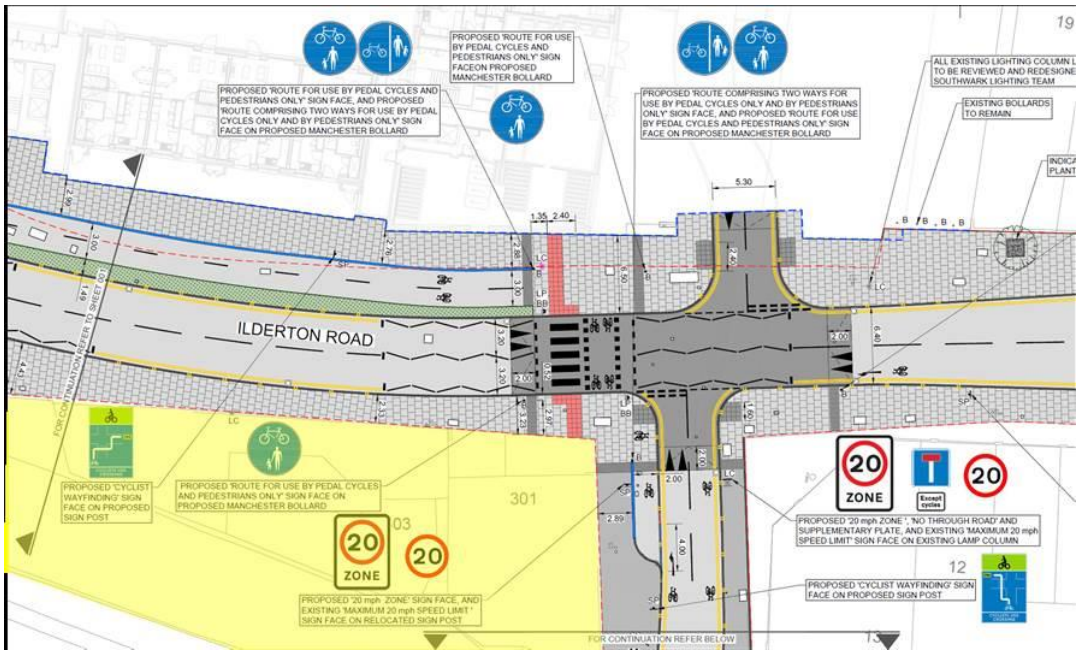


***Image 25**: Indicative layout of the CFR12. The application site is hatched in yellow.*

340. The Highways Team has been engaged with the applicant to ensure the proposed development integrates with the design of this section of CFR 12, which is scheduled for implementation in Summer 2025. All three existing crossovers on Ilderton Road will be removed, and full-height kerbs and footway reinstated under a Section 278 agreement, funded by the applicant. This will significantly enhance the pedestrian and cycling environment by creating a safe, continuous footway and supporting the delivery of CFR 12—particularly the new crossing on Ilderton Road.

Active Travel Audits

341. The ‘Active travel’ agenda, which is promoted at all levels of policy, seeks to make walking, wheeling and cycling the preferred choice for everyone. Upon the request from TfL, the applicant carried out two Active Travel Audits (ATAs), one for the day-time and one for the night-time. The purpose of the ATAs is to identify deficiencies in the existing local transport and public realm network, and make recommendations as to how these could be improved.

342. The assessment indicates that overall the current facilities are shown to be of a good quality and suitable to serve the proposed development. Therefore, it is not necessary to implement any improvements at this time beyond those already committed to in order to enhance the development proposals.

Conclusion on Healthy Streets

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

- it would make enhancements to the public realm through active frontages (providing a safe and pleasant active travel experience)
- it would be car-free save for wheelchair parking spaces, thus promoting walking, cycling and use of public transport;
- it has been designed to minimise air and noise pollution; and
- It would provide investment in sustainable transport facilities and services to commensurately mitigate the impact on existing infrastructure including the following:
    - £152,100 (index linked from 2019) for public transport improvement such as bus services
    - £4,338 (index linked) towards expansion of TfL cycle docking stations in the vicinity of the site

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

- Reinstate redundant vehicle crossovers on Ilderton Road as footway (if not reinstated by others).
- Creation of new crossover on Hornshay Street, designed in line with LB Southwark standards.
- Repave footway including new kerbing fronting the site on Hornshay Street using precast concrete slabs and 150mm wide granite kerbs.
- Removal of the existing sinusoidal hump from Hornshay Street and resurfacing the carriageway.
- Construct a dropped kerb on Ilderton Road for refuse bin access.
- Repair of any damage to the public highway due to construction activity.
- Kerbing on Ilderton road to be replaced with 150mm wide granite kerbs.

- ‘Double blip’ restrictions to be refreshed following works.

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

Trip generation

346. Policy T4 of the London Plan requires development proposals to ensure the impacts on the capacity of the transport network are fully assessed and that any adverse impacts are mitigated. Policies P45, P49 and P50 of the Southwark Plan require developments to minimise the demand for private car journeys and demonstrate the public transport network has sufficient capacity to support any increase in the number of journeys by the users of the development.

347. As a borough, Southwark agrees with TfL that bus services will need to be increased in the Old Kent Road area ahead of the delivery of the BLE, in order to accommodate the demand generated by additional homes (as part of Phase 1 of the Delivery Plan) and additional jobs. As part of this agreement, TfL is required to report back to the Council with evidence that these pooled contributions are being spent appropriately; this reporting will serve as evidence that any further financial draw from future development is justified. As part of the agreement, TfL can require contributions from developments based on a tariff of £2,700 per proposed home (or equivalent for PBSA bedspaces), index-linked to March 2019.

348. The proposals would a net reduction of 32 two-way trips over the course of the day when compared to the existing uses of the site, inclusive of all modes of transport. Importantly, the proposed site operation is predicted to generate 163 fewer two-way vehicle trips on a daily basis compared to the existing use.

349. Given the lack of on-site general needs for car parking along with the various public transport options in the area, nearby cycle links and on-site cycle parking provision, the trips associated with the proposed development would predominantly be by sustainable travel modes including on public transport, by bicycle and on foot.

350. As there would be a public transport capacity impact from planning application 24/AP/3819, a contribution of **£152,100** (index linked from 2019) towards public transport improvement including local bus service investment is to be secured for use by Transport for London. The applicant has agreed to this contribution.

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

Travel Plan. These initiatives include the appointment of a dedicated Travel Plan Coordinator, the provision of cycling facilities, furnishing users of the development with travel information, and offering cycle training courses.

352. A Final Travel Plan and Transport Methods Survey is to be secured by condition to ensure the measures outlined in the draft document are implemented and promoted.

Servicing and deliveries

353. London Plan Policy T7 deals with servicing and delivery arrangements during construction and end use. With respect to end use, the policy requires provision of adequate space for servicing, storage and deliveries to be made off-street, with on-street loading bays only used where this is not possible.

Servicing/delivery trip generation

354. The applicant's Transport Assessment, based on TRICS data, estimates that the development will generate approximately 11–13 deliveries per day. The majority of these will be associated with the PBSA, including unplanned deliveries such as courier and postal services arranged by students, as well as routine deliveries for building management and maintenance organised by the PBSA management company. The anticipated delivery split is as follows:

- PBSA: 8-9 deliveries per day
- Light industrial : 3-4 deliveries per day

355. The Transport Assessment predicts that delivery vehicles would be widely dispersed throughout the day, with most deliveries taking place over a 12-hour period between 10:00 and 22:00 hours.

356. The following initiatives are proposed in the Outline Servicing and Delivery Plan:

- on-site management team will manage servicing activity in relation to the PBSA, seeking where possible to minimise deliveries during peak hours (07:00 – 10:00 and 16:00 – 19:00 hours)
- suppliers will be encouraged to use consolidation wherever possible; and
- the PBSA management team will ensure that deliveries remain in the vicinity of the site for as little time as required and that vehicle engines are switched off while stationary (where possible).
- A dedicated maintenance team will likely be employed for PBSA building and would be suitably trained to carry out majority of the daily maintenance works to reduce the need for external contractors to be appointed.

Servicing/delivery routing

357. The proposed service yard would have the capacity to accommodate a range of delivery vans. These vehicles would reverse into the yard from Hornshay Street to carry out loading activities within the site. To facilitate this, the gates will be set back 6 metres from the nearside footway on Hornshay Street, allowing vehicles to wait without obstructing the adjacent carriageway. Upon completing deliveries, vehicles would exit the site in a forward gear back onto Hornshay Street. The swept path analysis showing delivery vans would be safely reverse into the site without encroaching the cycle lane on Hornshay Street and the footway in the latest CFR12 design.

358. The proposed access to service yard represents a similar arrangement to the existing site operation. This arrangement is also permitted as per the extant planning permission 20/AP/3560. This approach is necessary due to the introduction of double yellow lines along Ilderton Road, which will restrict loading on this designated bus route. Additionally, incorporating a turning circle within the service yard would result in a substantial reduction in employment floorspace and lead to a compromised internal layout. As part of the CFR12 scheme, double yellow line restrictions will also be implemented along the edge of the carriageway on Hornshay Street adjacent to the site. This will improve access to the service yard compared to the existing arrangement, as informal parking currently occurring on the nearside edge will be removed, thereby improving visibility for vehicles exiting the site.

359. The applicant has undertaken a Stage 1 Road Safety Audit, which confirms that the proposed arrangement meets the audit's recommendations.

Servicing/delivery hours

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

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

Conclusion on servicing/deliveries

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

PBSA move-ins and move-outs

362. Students moving in and out of PBSA can generate a significant demand for loading space nearby. To ensure these impacts are minimised, the

procedure for managing student arrival and departure periods at the start and end of term will be set out within the Final Student Management Plan to be secured by obligation, and this will be expected to align with the principles in the application-stage documents. The key elements proposed at this stage are:

- the on-site service yard will be for use by drop-off/pick-up activity;
- through an electronic booking system, students will be given a dedicated time slot (times would be distributed to avoid peak periods) in which they are able to make use of the service and maintenance bay to move their items;
- the move-in/out process may (if necessary, depending on numbers of move-ins) be spread across multiple days as necessary to ensure each student who requires it is provided with a time slot.
- Carefully consider and plan for student move-in and move-out days that
- coincide with Millwall match days. Possible strategies to mitigate this impact could include adjusting appointment times for students, providing clear communication to students about alternative routes, and deploying additional staff or traffic marshals on these specific days.

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

- an increased management presence will be provided to manage activity;
- in advance of their move-in date, students will be sent a supporting information pack relating to the vehicle move-in strategy, as well as information on public transport routes available to non-car arrivals.
- Traffic marshals will be appointed to be stationed at Hornshay Street during peak move-in days to avoid illegitimate parking

364. In respect of move-out arrangements, student term end dates are variable depending on their respective courses, and as such, the process is less intensive – hence why some additional measures above would apply to move-ins.

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

Refuse storage arrangements

366. A bulky waste store is located to the rear of the site within the service yard. There will be a refuse stores within the PBSA building. The commercial refuse store is shown to be within the unit itself. Whilst this should normally be separated from the unit, it should be noted that the commercial units are small and this was accepted under the extant permission. Majority of the bin collections (except the bulky waste store) will take place from Ilderton Road as per the extant permission 20/AP/3560. Both the Transport Planning Team and the Council's Highways Team acknowledged that the

exact location of any loading bay could the agreed within the S278 agreement. Both waste from both the PBSA and the light industrial units will be arranged for collection by the tenant through a commercial waste collector. The Applicant has confirmed that all refuse collections will be scheduled outside the conventional highway peak hour period (08:00-09:00 and 17:00 – 18:00 hours).

367. Plans submitted with the application demonstrate that the refuse store has been sized to accommodate the refuse receptacles necessary to meet the volumes of waste generated by the PBSA (8 x 1100L bins and 4 x 440L food waste bins, totalling 10,560L capacity for bi-weekly collection frequency) and light industrial units, with sufficient manoeuvring and circulation space factored-in.

368. Through an obligation in the S106 Agreement, the developer is obliged to ensure that a contract is in place with a commercial provider of refuse/recycling collection services for both the PBSA and commercial uses for the lifetime of the development. The operators will be expected to keep refuse within the demise of the property and collect the refuse

369. The Final DSP, to be required by condition, will secure the finalised refuse details including the collection arrangements to avoid any potential traffic movement issues.

370. In order to ensure that on-street servicing and deliveries do not negatively impact on the highway network, the Council is recommending that applicants in the Old Kent Road Opportunity Area enter into Delivery Service Plan Bonds against their baseline figures for all daily servicing and delivery trips. The proposal is for the management of the new development to monitor the daily vehicular activity of the site both commercial and PBSA, quarterly for a period of 2 years from 75% occupancy. If the site meets or betters its own baseline target the bond will be returned within 6 months of the end of the monitoring period. If the site fails to meet its own baseline, the bonded sum will be made available for the Council to utilise for sustainable transport projects in the ward of the development. The Council will retain £2,790 (index linked) for assessing the quarterly monitoring. The bond in this instance would be £8,468 (index linked) based on the 169 PBSA bedspaces and 2250sqm of non-residential floorspace. The applicant has agreed to the contribution, which can be collected via the legal agreement.

Car parking

371. Policy T6 of the London Plan requires developments in locations with existing and future high public transport accessibility to be car-free, save for adequate parking for disabled people. Specific requirements for different uses are set out in Policy T6.1 through to Policy T6.4, while Policy T6.5 deals with non-residential disabled persons parking.

372. Southwark Plan Policy P54 echoes the London Plan, promoting car-free development in zones with good public transport accessibility. It requires car-free non-residential proposals in CAZ locations, and for any disabled parking to be provided on-site and supported by EVCPs.

Wheelchair car parking provision

PBSA

373. Applying the London Plan standards, a total of 5 wheelchair accessible parking spaces (i.e. 3% of one third of 169 student beds) should be provided on-site from first occupation of the proposed development.

374. The Southwark Plan requires a maximum of one car parking space per wheelchair accessible unit, which for this application would equate to a maximum of 10 (applying a 1:3 ratio to the PBSA wheelchair units). The policy makes clear that lower levels of parking can be provided, depending on:

- the anticipated demand for parking spaces,
- the tenure of the development;
- the quality and accessibility of the local public transport network; and
- the access to local amenities.

375. No disabled parking space will be provided in this application as students with mobility impairments will normally be prioritised by their educational institution to accommodation closest to their teaching campus. There are no teaching buildings immediate next to the application site, and even if there was, the closeness removes the need for students to have a Blue Badge vehicle. Given the site's location close to numerous and regular bus routes and Queen's Road Station, as well as its predicted future PTAL rating, residents would benefit from a range of public transport options. On balance, no disabled car parking spaces provided is acceptable.

376. However, the Applicant recognises that without any on-site provision of disabled parking space, the development would also not provide any electric vehicle charging points. The Applicant therefore has agreed to contribute £9,000 (index linked) to install electric charging points to the on-street parking spaces nearby.

Reducing car usage

377. The site is within the Southwark's Old Kent Road Control Parking Zone (CPZ). Through an obligation in the Section 106 Agreement, all residents of the proposed development would be exempted from applying for parking permits. A compliance condition will also ensure the marketing materials/details used to market all of the for rental student homes hereby consented will clearly identify the development as car free.

Cycle parking

378. London Plan Policy T5 sets minimum cycle parking standards for different uses. Southwark Plan Policy P53 sets out requirements that are generally higher than the London Plan standards.

379. The table below summarises the minimum cycle parking required by the Southwark Plan and London Plan, alongside the provision proposed by this application based on the submitted drawings. Wherever flexible uses are proposed, the use with the highest storage requirement yield has been adopted for the purposes of these calculations:

Table 17: Cycle parking minimum policy requirements vs provision: Summary table

Land use	Long-stay spaces			Short-stay spaces		
	Requirement		Provision	Requirement		Provision
	SP '22	LP '21		SP '22	LP '21	
PBSA	169	127	170	17	4	18
Light industrial (Class E(g)(iii))	3	2	3	1	1	1
Total	**172**	**129**	**173**	**18**	**5**	**19**

PPSA long-stay cycle parking

380. With regard specifically to the PBSA, as per request from officers, the Applicant has replaced their cycle lockers with conventional cycle stands and racks for students, who would likely choose to store foldable bikes in their bedrooms instead. As the table above shows, the latest proposal for the PBSA would meet the minimum Southwark Plan requirement which is supported.

381. In total 170 secure long stay cycle parking spaces would be provided for the PBSA – these would be located at the basement level, but accessible by lift in this mix of formats:

- 77 two-tier Stands [154 spaces] (91% of the total);
- 3 standard Sheffield Stands [6 spaces] (4% of the total); and
- 5 Sheffield Stands for use by accessible/larger cycles [10spaces] (6% of the total).

382. During the course of this application, detailed layouts have been provided of all the cycle stores as per officers' requests, showing general compliance with the London Cycle Design Standards, including adequate aisle widths and stand spacings, adequate width for the lift to the basement cycle store.

For these reasons, the quality of long-stay cycle storage is considered acceptable.

Commercial long-stay cycle parking

383. With regard specifically to the commercial uses, a total of 3 secure long stay cycle parking spaces would be provided with the southern end of the service yard, all in Sheffield Stand format.

384. As shown from the table above, the proposal for the non-residential uses would meet the Southwark Plan and exceed London Plan requirements.

Short-stay cycle parking

385. With regard to the proposed short-stay (visitor) provision for the PBSA, 18 spaces will be provided in this mix of formats:

- 3 two-tier Josta Stands [6 spaces] within the building;
- 6 standard Sheffield Stands [12 spaces] within the building;

386. 4 spaces will be provided for the light industrial units in the form of accessible Sheffield stands.

387. The short-stay provision would exceed the Southwark Plan requirement and London Plan requirement.

Improving access to cycle hire options

388. Given that the development would introduce up to 3 additional FTE employees to the site and 169 students upon full occupation, the applicant has agreed to contribute £4,338 (index linked) towards expansion of one or more TfL (Santander) cycle docking stations in the vicinity of the site. To be secured in the Section 106 Agreement, this contribution would meet the requirements of Policy T5 of the London Plan and Policy P53 of the Southwark Plan.

Level changes across the ground plane

389. There is likely to be a degree of regrading of some of the existing footway to achieve the requisite cross-fall. This is standard practice and will be agreed through the Section 278 process, which occurs subsequent to planning permission being granted. The planning application proposes no changes to the existing road carriageway or kerb levels.

390. In the interests of optimising the layout of the development, ensuring the most efficient use of land, and having regard to inclusive design policies and equalities considerations, a planning condition is recommended requiring the applicant to provide a Final Ground Plane Spot Levels Plan prior to above grade works.

Transport and highways summary

391. Having considered all transport and traffic related implications, the scheme would minimise vehicle movements by prioritising use of public transport, walking and cycling, and by encouraging consolidation of deliveries.

Environmental matters

Construction management

392. The applicant has submitted an Outline Environmental Construction Management Plan explaining how construction activities will be managed to minimise neighbour amenity, environmental and highway network impacts. This document has been reviewed by the relevant transport and environment consultees, who have deemed it to be a satisfactory framework document.

393. In order to ensure that increases in traffic, noise and dust associated with the demolition and construction phases of the development are minimised, a Final Construction Environmental Management Plan and a Construction Logistics Plan are to be required by condition. The applicant has also agreed to pay a sum of £9,815 (index linked) to the Council's Highways Network Management and Environmental Protection Teams to fund their work in monitoring adherence to the CEMP through the demolition and construction phases.

Flood risk, resilience and safety

394. The site is in Flood Zone 3 and is located within an area benefitting from flood defences. The site was assessed as part of the Council's Strategic Flood Risk Assessment (2017) and sequential test. No further sequential test is required. The applicant's Flood Risk Assessment sets out that the site is at low risk of flooding from all other sources, including fluvial, surface water, groundwater, reservoir and artificial sources is low. The Environment Agency has reviewed the applicant's Flood Risk Assessment and considers it to be acceptable.

395. In terms of flood resilience and safety, the Council's Flood Risk Management Team has assessed the applicant's revised Flood Risk Assessment and is satisfied that there will be no flooding in events up to and including the 1 in 100-year (plus climate change) rainfall event.

Sustainable urban drainage

396. The applicant's Drainage Strategy proposes that surface water flows would be attenuated through the use of permeable paving. Whilst the proposed runoff rate of 2 l/s is not the greenfield runoff rate, it is sufficient for the proposed site.. Two conditions are recommended, one requiring details of

the final surface water drainage system to be submitted prior to commencement of the development, and the other requiring submission of a verification report prior to occupation.

397. As a precautionary measure, the Section 106 Agreement will include an offset obligation in the event that the finalised drainage system fails to achieve greenfield rates of run-off cannot (to be confirmed by the verification report referred to above). The contribution will be calculated at a rate of £366 (index linked) per cubic meter.

Land contamination

398. The application was accompanied by a Preliminary Land Contamination Risk Assessment, which the Council's Environmental Protection Team (EPT) has assessed and deemed acceptable subject to further requirements including an intrusive site investigation due to the presence of potential pollutant linkages, a contamination remediation scheme, and a remediation strategy addressing any contamination that not previously identified. These requirements will be secured by planning conditions.

399. The Environment Agency has also confirmed it has no objection to the proposal, subject to similar conditions as those recommended by the EPT. In addition, it has requested that no drainage systems involving infiltration of surface water into the ground be used, and that no piling or other penetrative foundation methods be undertaken without the express consent of the Local Planning Authority (LPA). These conditions will also be secured accordingly to ensure no unacceptable risks to groundwater.

Utilities

400. In terms of electricity, the scale of this development is broadly similar to the extant permission (20/AP/3560). UKPN has not responded to a consultation request from the Southwark Council about the planning application, and as such no objections are assumed with regards to the impact the proposal will have on the power supply network.

401. The proposed development is located within 15 metres of a strategic sewer and a strategic water main. A condition is recommended to secure a piling method statement as per Thames Water's request.

402. Thames Water have identified that they cannot fully determine the surface water and foul water capacity needs from the development as such Thames Water recommended a planning condition to be attached to any approval to ensure development Condition are therefore recommended. Impacts on the local surface water infrastructure are dealt with in a separate part of this report entitled 'Sustainable urban drainage'.

403. Thames Water have identified that given an estimated higher water consumption in the current proposal than the extant permission 20/AP/3560 and the cumulative impact from the consented schemes nearby, there may

be an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Works are ongoing to understand this in more detail and as such Thames Water recommended a planning condition to be attached to any approval to ensure development does not outpace the delivery of essential infrastructure and acceptable pressure levels in the potable water supply

404. There would be no impacts on the National Gas Transmission network as no gas will be used. A plant room for District Heat Network connection will be provided on the ground floor of the building. A S106 obligation will also require the commercial development to future proof any connection to District Heat Network (see also Energy and sustainability section).

405. For these reasons, it considered that the application meets the requirements of Southwark Plan Policies P64, P67 and P68.

Wind microclimate

406. London Plan Policy D9 requires all tall building proposals not to cause changes to the wind environment that would compromise comfort and the enjoyment of open spaces around the building and in the neighbourhood. Southwark Plan Policies P14 and P56 require wind effects to be taken into consideration when determining planning applications, as does Policy P17 where the proposal is a tall building.

407. The applicant's Wind Microclimate Report submitted in support of the application considers the following scenarios by using Computational Fluid Dynamic (CFD) modelling in both summer and winter:

- Scenario 1 – proposed development in the existing surrounds
- Scenario 2 – proposed development in the future surrounds

408. Wind conditions have been categorised using the Lawson Comfort Criteria, where the predicted wind conditions are assessed against the intended uses, as well as the Lawson Safety Criteria.

409. The Wind Microclimate Report finds that, in both summer and winter with the existing surrounds and emerging context, there are no wind safety or distress exceedances at ground level anywhere in the site of surrounding area. All ground level comfort conditions are also suitable for their intended uses, including building entrances and bus stops. Conditions on the majority of the roof terrace are suitable for the intended use, and not subject to wind safety concerns. There are some small regions near the gaps in the terrace parapet on the western perimeter of the terrace, which are a category windier than required as well as subject to distress exceedances. This will require mitigation, which is recommended in the form of angled railings (to give 50% porosity) across the gaps in the parapet. This will be secured by a condition as part of the hard and soft landscaping scheme. It is noted that the assessment does not include some recently consented schemes nearby. However, the report notes that once the cumulative schemes come forward,

conditions will become calmer. So it is likely that the mitigation secured will already cater for the worst-case scenario. Therefore, it is considered that London Plan Policy D9 and Southwark Plan Policies P14, P17 and P56 have been met.

Air quality

410. Whilst the subject site is located in the Southwark Air Quality Management Area, the Air Quality Assessment has confirmed that the site is not exposed to adverse air quality in excess of UK air quality objectives. As such, the Site is considered suitable for the introduction of residential use and no additional mitigation measures are required to reduce exposure.

411. The Assessment also considers the air quality impacts arising from the construction and operational use of the development, taking into account all relevant local and national guidance and regulations

412. In terms of the construction phase, assuming good practice dust control measures are implemented, the residual potential air quality impacts from dust generated by demolition, earthworks, construction and trackout activities was predicted to be not significant. A condition requiring the submission of a demolition and construction management plan (DEMP/CEMP) is therefore recommended to ensure mitigation and control measures are in place.

413. For the operational phase, the proposed building itself would be all-electric (meaning there would be no on-site combustion), which mitigates air quality issues and facilitates significant advances towards zero carbon in future decades as the National Grid continues to decarbonise. Also, the development is car-free.

414. The Council's Environmental Protection officer has reviewed the Air Quality Assessment and confirms that subject to the proposed mitigation measures, the effects on air quality during construction and operation are considered to be negligible and the air quality neutral standards for buildings and transport will be met.

Agent of change

415. Where new residential and other sensitive uses are proposed close to existing noise- and other potentially nuisance-generating development, Policy D13 of the London Plan requires the proposal, as the incoming ‘agent of change’, to be designed to mitigate and manage any impacts from existing sources on the future users/occupiers. Developments should be designed to ensure that established noise and other nuisance-generating uses remain viable and can grow without unreasonable restrictions placed on them.

416. In the vicinity of the site, there are a range of existing businesses. These businesses currently coexist with nearby residential uses. All proposed PBSA units would be specified to ensure reasonable resistance to sound such that these nearby noise-generating uses would not be at risk of having

their operations compromised and/or any future growth unreasonably curtailed. No issues are foreseen in respect of the nearby uses and public transport services being unable to function/coexist with and grow alongside the proposed non-residential uses.

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

Light pollution

418. With respect to light pollution from internal sources, this typically is an issue where light is emitted from artificial sources, such as commercial offices, towards:

- residential accommodation (where this would cause a nuisance to occupants); or
- natural environments where the existing level of external lighting is limited.

419. Given the urban environment, surrounding buildings and street lighting, the proposed development is unlikely to result in a significant change to the existing lighting levels. Furthermore, the façade detailing will break up the night-time illumination. The operational hours of the commercial development will be restricted through condition. Accordingly, it can be concluded that no undue effects would result from the occupation of the proposed residential uses, nor the commercial uses given that these are all contained at ground floor level.

420. With respect to light pollution from externally-affixed sources, buildings close to existing residential uses are not typically fitted with external lighting above ground floor level in the interests of minimising amenity harm to the surroundings. The final external lighting proposals, including any pre-determined dim-down and turn-off times, will be agreed through the Final Lighting Strategy, to be approved by the Council prior to first occupation of the building; this will be secured by condition.

Fire safety

421. Policy D12 of the London Plan expects all development proposals to achieve the highest standards of fire safety and to this end requires applications to be supported by an independent Fire Strategy, produced by a third party suitably qualified assessor.

422. Two Fire Statements were submitted with the application including Planning Gateway One form, a mandatory requirement of the HSE for all referable planning application submissions. Among other things, the Fire Strategy confirms that the following key fire safety measures:

- Two stairs will be provided, one of which will be a fire fighting shaft and remain available for egress throughout the building's height The basement will have a dedicated means of egress via a separated section in Stair 1;
- The Basement corridor will be ventilated with a Mechanical Smoke Ventilation System (MSVS) to mitigate smoke ingress into the stair.
- An evacuation lift will be provided in addition to the firefighting lift in Stair 1 with a single evacuation lift also provided to Stair 2.
- Fire and smoke curtains will be installed at Stairs 1 and 2 on the ground floor;
- Kitchen hobs will be located as far from the escape route as possible and will not be sited adjacent to the room entrance door;
- The hobs specified will be 2-ring electric units with a limited heat output
- Each PBSA room will be equipped with a residential sprinkler system and a Category 1 fire detection and alarm system to BS 5839-1;
- The development will comply with Building Regulations Approved Document B compliance.

423. The Fire Strategy was produced by fire risk engineering consultancy FDS Consult. The contents of the document have been checked and approved by a certified fire risk engineer (a Member of the Institution of Fire Engineers (MIFireE)). The HSE subsequently has confirmed the fire strategy is satisfactory and any technical fire safety technical details will be assessed at the Gateway 2 and building control stages

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

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

Energy and sustainability

426. Chapter 9 of the London Plan deals with all aspects of sustainable infrastructure and identifies the reduction of carbon emissions as a key priority. Policy SI2 "Minimising Greenhouse Gas Emissions" requires all developments to be net zero carbon with a minimum on-site reduction of 35% against the Part L 2021 baseline for both commercial and residential uses. Residential development and non-residential development should achieve a 10% and 15% reduction in emissions through energy efficiency measures respectively. Where developments are unable to meet net zero carbon targets any shortfall between the minimum 35% and zero carbon must be mitigated by way of a payment towards the carbon offset fund. The energy strategy for new developments must follow the London Plan hierarchy (comprising 'be lean', 'be clean', 'be green' and 'be seen') and this

must be demonstrated through the submission of an Energy Strategy with applications, as well as post construction monitoring for a period of 5 years.

427. Southwark Plan Policies P69 and P70 reflect the approach of the London Plan by seeking to ensure that non-residential developments achieve a BREEAM rating of 'Excellent' and include measures to reduce the effects of overheating using the cooling hierarchy. The policies pursue the 'lean, green, clean and seen' principles of the London Plan. The policies pursue the 'lean, green, clean and seen' principles of the London Plan and require residential buildings to be zero carbon with all reduction on-site and non-residential buildings to be zero carbon with an on-site reduction of at least 40% against the Part L 2021 baseline. Any shortfall must be addressed by way of a financial contribution towards the carbon offset fund.

Energy and carbon emission reduction

Be Lean

428. In terms of meeting the 'be lean' tier of the hierarchy, a range of passive and active measures are proposed. These measures include:

- specifying energy efficient fabric and air tightness of the building to enhance thermal performance;
- installing high-efficiency lighting, as well as photoelectric switching in communal areas; and
- waste water heat recovering with 39% heat recovery efficiency

429. Overall these 'demand reduction' measures will achieve an 31% reduction in carbon emissions over Part L 2021, which substantially exceeds the 15% London Plan target and is welcome. The Energy Statement demonstrates that a fabric first approach has been adopted. This is evidenced by the space heating demand for both uses being substantially below the GLA Energy Guidance benchmarks as shown in the table below.

Table 18: Space heating demand and EUI performance:				
Uses	**Energy Usage Intensity (EUI) (kWh/m2/year)**	**Space heating demand (kWh/m2/year)**	**EUI value from Table 4 of the GLA Energy Assessment Guidance (kWh/m2/year)**	**Space heating demand from Table 4 of the GLA Energy Assessment Guidance (kWh/m2/year)**
Non-domestic	62	8.34	55	15
PBSA	37.05	7.85	55	15

Be Clean

430. The site is located in a heat network priority area (HNPA) and is located close to the proposed future route of the South East London Combined Heat and Power (SELCHP). The applicant has engaged proactively with the SELCHP operator (Veolia).

431. By designing-in a futureproofed plant room at ground floor level, as well as communal heat pumps in the same plant room to serve the Domestic Hot Water requirements in the building, the opportunity to link the development into a wider district heating system would be safeguarded. Furthermore, a S106 obligation has been agreed with the applicant to secure a full DHN Energy Strategy to demonstrate how the development will be designed and built so that the development will be capable of connecting to the future DHN. The applicant is also required to use all reasonable endeavours to connect the development to the District Heat Network provided connection is feasible and viable. This meets the requirements of Policy SI 3 of the London Plan. This meets the requirements of Policy SI 3 of the London Plan.

Be Green

432. With respect to the ‘be green’ tier of the hierarchy, the applicant has proposed the following technologies:

- Highly efficiently Air Source Heat Pumps for space heating and domestic hot water; and
- photovoltaic panels at roof level generating a total of 17.2 kWp and annual energy yield of 12,404 kWh

433. These ‘be green measures’ would reduce carbon emissions by 6% on a side-wide basis. The applicant has demonstrated that opportunities for renewable energy by producing, storing and using renewable energy on-site have been maximised.

Be Seen

434. Introduced as part of the London Plan 2021, 'be seen' is the newest addition to the GLA's energy hierarchy. It requires developments to predict, monitor, verify and improve their energy performance during end-use operation. All applications should conduct a detailed calculation of unregulated carbon emissions as part of the compliance with the 'be seen' policy and associated guidance.

435. The applicant's Energy Statement states that a suitable metering strategy will be implemented to record energy consumption and generation from the point at which the different uses within the development are occupied. It is recommended that the on-going requirements for monitoring energy consumption and generation, and the associated reporting to the GLA in line with policy, be secured through a planning obligation.

Total energy savings

436. Southwark Council's carbon offset cost is £95 for every tonne of carbon dioxide emitted per year over a period of 30 years. This is the equivalent of £2,850 per tonne of annual residual carbon dioxide emissions.

437. The proposal would reduce on-site regulated carbon dioxide emissions by 37% over a notional building minimally compliant with the Building Regulations 2021, which meets the London Plan 35% minimum target. The performance is summarised in the below table:

Table 19: CO2 emissions from each stage of the Energy Hierarchy: Summary table			
	Total Regulated Emissions	**CO2 Savings**	**Percentage saving**
Part L 2021 Baseline	27.6 tonnes CO2		
With **Be Lean** applied	19.1 tonnes CO2	8.6 tonnes CO2	31%
With **Be Clean** applied	19.1 tonnes CO2	0	0
With **Be Green** applied	17.4 tonnes CO2	1.7 tonnes CO2	6%
Cumulative saving		**10.2 tonnes CO2**	**37%**
Shortfall on carbon zero	**17.4 tonnes CO2**		

438. Whilst the carbon emissions reduction performance measured in percentage over the baseline may not appear as high as other schemes. However, the scheme has adopted the fabric first approach following the energy hierarchy and substantial savings 31% will be from the 'be lean' measures.

439. The energy savings, as detailed above, which take into account the decarbonisation of the electricity grid, demonstrate the good environmental and sustainability credentials of the proposed development. The total per annum shortfall in savings relative to carbon zero would, at a rate of £95/tonne for 30 years, generate an offset contribution of **£49,570.** The offset contribution will be secured in the Section 106 Agreement, with appropriate adjustment clauses should there be any improvements to the carbon emissions in the post-planning design development stages.

Whole life cycle and carbon capture

440. London Plan Policy SI2 requires all major development proposals to be supported by a whole life cycle carbon assessment. This assesses the embodied and operational emissions associated with redevelopment.

441. 'Embodied carbon' is the term used to describe the carbon emissions associated with:

- extraction and manufacturing of materials and products;
- in-use maintenance and replacement;
- end of life demolition, disassembly and disposal; and
- the transportation relating to all three.

442. 'Operational carbon' is the carbon dioxide associated with the in-use operation of the building. This usually includes carbon emissions associated with heating, hot water, cooling, ventilation and lighting systems, as well as those associated with cooking, equipment and lifts.

443. Driven by the aim of achieving net carbon zero for new development by closing the implementation gap, whole life cycle carbon assessments are monitored at the pre-application, submission and post-construction stages. Policy P70 of the Southwark Plan reinforces the need to calculate whole life cycle carbon emissions through a nationally recognised assessment and demonstrate actions taken to reduce life cycle carbon emissions.

444. For predominantly residential developments, the benchmark set by the GLA for Modules A1-A5 is 850kgCO2e/m2, with an aspirational benchmark of 500 kgCO2e/m2 GIA. The benchmark for Modules B-C is 350kgCO2e/m2, with an aspirational benchmark of 300kgCO2e/m2.

445. The submitted whole life carbon assessment for the planning application considers the operational carbon and embodied carbon of the proposal throughout its life from construction, use and deconstruction. The assessment

finds that over a 60-year study period, the development's operational and embodied load would be:

- 705 kgCO2e/m2 for Modules A1-A5 (covering the product sourcing and construction stages); and
- 280 KgCO2e/m2 for modules B to C (covering the in-use and end-of-life stages), excluding operational energy and water.

446. The key whole life carbon emission reduction measures include the following:
- Glass mineral wool insulation instead of PIR insulation;
- Use of cement content of 40% GGBS within concrete; and
- Mixed aluminium/timber windows instead of aluminium windows

447. Therefore, the proposed development meets the GLA benchmark for Modules A1-A5 and Modules B-C. The WLC Assessment also identifies the following measures to be considered at the next stage of the design of the development:

- Using cement combination consisting of Ordinary Portland Cement (OPC) and 25% replacement with GGBS (Blast Furnace Slag Cement); and
- Specifying calcium sulphate screed (1500kg/m3)

If these measures are implemented, further upfront carbon reductions in Modules B and C will be achieved, lowering the total upfront carbon from 280 $kgCO_2e/m^2$ to 221 $kgCO_2e/m^2$. Any further technical adjustments to the Energy Strategy will be dealt with under GLA Stage II referral.

448. Condition is proposed requiring whole life-cycle carbon assessment in the completion stages. Subject to this condition, the proposal is considered to comply with London Plan Policy SI2.

Circular Economy

449. Southwark Plan Policy P62 states that a Circular Economy Statement should accompany planning applications referable to the Mayor. Circular economy principles include conserving resource, increasing efficiency, sourcing sustainably, designing to eliminate waste and managing waste sustainably at the highest value. London Plan Policies GG5, D3 SI7 and all mention circular economy principles and the benefits of transitioning to a circular economy as part of the aim for London to be a zero-carbon city by 2050.

450. A Circular Economy Statement was submitted with the application, which sets out strategic approaches, specific commitments and the overall implementation approach.

451. It is noted that a Bill of Materials has not been provided in the submitted Circular Economy Statement. However, the principle of demolishing the existing building has already been established through the extant permission (ref: 20/AP/3560). In line with the approach taken in that permission, a pre-

commencement condition is recommended to secure an updated Circular Economy Statement, including full details such as the Bill of Materials. The Applicant has also provided additional information to address GLA officers' comments.

452. The application has addressed the requirements of London Plan Policy SI7, Southwark Plan Policy P62, and has referenced the GLA's guidance in producing the Circular Economy Statement. Conditions are proposed requiring post-completion reporting. The Council's Sustainability Officer has confirmed the proposal is acceptable. GLA officers will be further consulted under Stage II referral. Subject to these conditions and GLA stage II referral, the proposal is considered to broadly comply with the sustainable materials element of Policy P17.

Overheating and cooling

453. London Plan Policy SI4 details that major development proposals should demonstrate how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy. Policy P69 of the Southwark Plan states that development must reduce the risk of overheating, taking into account climate change predictions over the lifetime of the development, in accordance with the cooling hierarchy.

454. The six-step hierarchy that should be followed when developing a cooling strategy for new buildings is as follows:

- minimise internal heat generation through energy efficient design; then
- reduce the amount of heat entering the building through the orientation, shading, albedo, fenestration, insulation and green roofs and walls; then
- manage the heat within the building through exposed internal thermal mass and high ceilings; then
- use passive ventilation; then
- use mechanical ventilation; then
- use active cooling systems (ensuring they are the lowest carbon options).

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

Minimise internal heat generation

456. In both the residential and non-residential elements of the development, internal heat generation is to be minimised through measures including the use of A-rated energy-efficient appliances and LED lighting throughout to eliminate heat gains.

Reduce heat entering the building

457. The heat entering the proposed development is to be reduced by a combination of measures including low fabric U-values used throughout and minimal south facing glazing.

Manage the heat within the building

458. Good floor-to-ceiling heights are proposed in both the residential and non-residential parts of the proposed development. The applicant's Overheating Assessment confirms that thermal mass has been factored into calculations and that this will help to offset temperatures when the building becomes cooler.

Use passive ventilation

459. Due to acoustic constraints, the overheating modelling has assumed a worst-case scenario in which windows remain closed at all times. However, the design—as outlined in the Design and Access Statement—includes manually openable natural ventilation panels located behind perforated screens. This approach gives occupants the option to open the panels if they wish, allowing for natural ventilation while maintaining acoustic performance.

Use mechanical ventilation

460. With regard to the PBSA building, mechanical ventilation with heat recovery (MVHR) is provided to the building.

Use active cooling systems (low carbon)

461. Due to the steps taken in accordance with the cooling hierarchy, as set out above, the need for cooling to avoid overheating risk throughout the year would be reduced across all the proposed uses. When active cooling is required, this will be provided by mechanical ventilation units with hybrid cooling.

Summary

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

BREEAM

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

- 72.27% for student accommodation
- 69.73% for light industrial units

Whilst the light industrial floorspace falls below the minimum target of 70%, it is only marginal, and the student accommodation exceeds the target. It is therefore considered acceptable on balance. A planning condition is recommended to secure this.

Water efficiency

464. The Sustainability Statement submitted by the applicant confirms that the proposed development aims to minimise water consumption through efficient fixtures and fittings, water monitoring and water leak detection measures:

- low flush toilets and low flow wash hand basin taps, kitchen taps and showers for the PBSA;
- water metering to encourage the monitoring
- mains water leak detection will be installed on the building's mains water supply

465. It is noted that the BREEAM excellent standard for the 'Wat 01' water category would not be achieved, as required by London Plan Policy SI5. The Applicant has explored additional water consumption reduction measures but given it is a student accommodation scheme, the costs to achieve the target will be substantial. The Sustainability Officer confirmed that overall the water efficiency measures are acceptable in this instance.

Communications and aviation

Digital connectivity infrastructure

466. The NPPF recognises the need to support high-quality communications infrastructure for sustainable economic growth and to enhance the provision of local community facilities and services.

To ensure London's long-term global competitiveness, Policy SI6 "Digital Connectivity Infrastructure" of the London Plan requires development proposals to:

- be equipped with sufficient ducting space for full fibre connectivity infrastructure;
- achieve internet speeds of 1GB/s for all end users, through full fibre connectivity or an equivalent.
- meet expected demand for mobile connectivity; and
- avoid reducing mobile capacity in the local area.

467. The applicant has not confirmed in writing that the development would have the incoming duct arrangements to suit the provisions from the local networks, or

that by the time construction works are underway 1GB/s fire should be available. In this well connected urban location, it is very unlikely that delivering such digital infrastructure would prove difficult; therefore, it is considered acceptable in this instance for the requirements of Policy SI6 post-decision through a Digital Connectivity Strategy planning condition.

Television, radio and telecommunications networks

468. The NPPF requires local planning authorities to consider the potential for new development to interfere with broadcast and electronic communications services, and to mitigate this adequately. Part C of London Plan Policy D9, which is concerned with the functional impacts of tall buildings, echoes this, requiring that “buildings, including their construction, should not interfere with […] telecommunication”.

469. Proposed buildings that are tall and/or broad, and in particular this proposal have the potential to reduce coverage of mobile phone networks. Given the massing and height is the same as the extant permission 20/AP/3560, no harmful impacts are anticipated.

Aviation

470. The NPPF recognises the need for new development to maintain the national network of general aviation airfields, and their need to adapt and change over time. Part C of London Plan Policy D9 requires tall buildings not to interfere with aviation or navigation.

471. Given the massing and height is the same as the extant permission 20/AP/3560, it is reasonable to conclude that the proposed tall buildings would not cause any harmful aviation impacts.

Economic impacts

472. London Plan Policy E11 requires development proposals to support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases. This requirement is also covered by Southwark Plan Policy P28, with the methodology for securing these opportunities prescribed by the Council’s Section 106 Planning Obligations and Community Infrastructure Levy SPD (2025)

Direct on-site employment and training

473. In accordance with the policy framework, there would be a requirement for this development to deliver training and employment during the construction phase only. 12 construction industry apprentices, 12 short courses and 3 sustained jobs for unemployed Southwark Residents would be required. These would all need to be filled by the applicant in accordance with a Construction Phase

Employment, Skills And Business Plan. These obligations will be secured through the Section 106 Agreement.

474. Applying the metrics advised by the Homes and Communities Agency Employment Density Guide, the existing warehouse uses currently have the potential to employ a combined total of 6 people. However, the existing car repair centre has been vacant.

475. The applicant suggests that the PBSA will employ around 3 staff. The proposed light industrial units (which contain 169 NIA square metres of non-residential floorspace), would support up to 3.6 FTE positions

476. Overall, it is estimated that the proposed development would deliver up to 6.6 FTE positions, representing a marginal uplift on the site's current employment potential. It would satisfy the aims of the London Plan and the Southwark Plan in creating new jobs within the Opportunity Area.

Social and community integration

477. The strategic policies of the Southwark Plan, in particular Policies ST1 and SP2, expect new development proposals to foster mixed and integrated communities, noting that environments should seek to promote inclusivity and interaction to help achieve this.

478. It is noted that there is a concern that delivering a student housing led scheme of this size and density, which would only provide for one generation, is ill fitted to the location.

479. Due to their inherently transient nature, student populations can prove more challenging to integrate into their local community. Cognisant of this, and mindful of the built and consented student accommodation nearby, the Applicant has committed to provide 10% of the employment floorspace as affordable workspace. Given site constraints particularly the small and triangular nature of the plot, it is challenging to provide extra community spaces within the proposed building.

480. For these reasons, it is considered that the applicant has made proportionate and adequate efforts to respond to the strategic objectives of the Southwark Plan and London Plan to integrate the 169 students with the future resident community as well as the wider existing residents. It is considered on balance that the 169 student residents this scheme would introduce, when coupled with the other student homes schemes nearby, would not give rise to an imbalanced, unintegrated or mono-cultural community.

Health impacts

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

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

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

482. It is noted that NHS Healthy Urban Development Unit (HUDU) requested a financial contribution towards healthcare provision to meet this increased demand. However, officers consider that the requested contribution is not justified and would not meet the three tests set out Community Infrastructure Levy Regulation 122. The detailed explanation is set out in paragraph 508 below.

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

Planning obligations

484. London Plan Policy DF1 and Southwark Plan Policy IP3 advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. These policies are reinforced by the Section 106 Planning Obligations and CIL SPD, which sets out in detail the type of development that qualifies for planning obligations. The NPPF echoes the Community Infrastructure Levy Regulation 122 which requires obligations to be:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development

485. In accordance with the Section 106 Planning Obligations and CIL SPD, a suite of contributions have been agreed with the applicant in order to mitigate the impacts of the development. These are listed in detail at Appendix 6 of this report. In summary, the financial contributions (which total at least £8,057,741 index linked) are:

- Affordable Housing Contribution: £7,689,500 (subject to BCIS All in Tender Price Index)
- Public Transport Contribution: £152,100 (BCIS index linked from 2019)

- Cycle Hire Docking Station Contribution: £4,338 (BCIS index linked)
- Construction Management Plan Review & Monitoring Fee: £9,815 (RPI All Items index linked)
- Delivery and Servicing Monitoring Fee: £2,790 (RPI All Items index linked)
- Electric Charging Point Contribution: £9,000 (BCIS index linked)
- Total Carbon Green Fund Contribution: £49,570 (RPI All Items index linked).
- Old Kent Road Public Open Space Contribution: £109,850.00 (BCIS index linked)
- Archaeology Monitoring Contribution: £6,778 (RPI All Items index linked)
- New Tree Contribution: £9,000 (BCIS index linked)
- Monitoring Fee: At least £15,000

486. A number of contingent/default financial obligations will also apply. These will require a financial contribution in the event of a failure to deliver all or part of the following development benefits/mitigation:

- Agreed on-site carbon emissions reduction;
- Agreed run-off rates;
- Agreed delivery and servicing baseline activity;
- Agreed number of construction employment, training and apprenticeships; and

487. Appendix 6 should be referred to for the full detailed set of the obligations sought to mitigate the development's impacts. Many of the obligations, although not a financial contribution per se, are extensive in nature. The appendix also includes the applicant's current position in relation to each of these requested obligations

488. In the event that a satisfactory legal agreement has not been entered into by 10 March 2026, it is recommended that the director of planning and growth refuses planning permission, if appropriate, for the following reason:

"The proposal, by failing to provide for appropriate planning obligations secured through the completion of a S106 agreement, fails to ensure adequate provision of mitigation against the adverse impacts of the development through projects or contributions, contrary to: Policy DF 1 ('Planning Obligations') of the London Plan 2023; Policy IP3 ('Community Infrastructure Levy (CIL) and Section 106 Planning Obligations') of the Southwark Plan; and the Southwark 'Section 106 Planning Obligations and Community Infrastructure Levy SPD' 2025".

489. Mayoral and Borough Community Infrastructure Levies

490. Section 143 of the Localism Act states that any financial contribution received as community infrastructure levy (CIL) is a material "local financial consideration" in planning decisions. The requirement for payment of the Mayoral or Borough CIL is therefore a material consideration. However, the

weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport investments in London as a whole, while the Borough CIL will provide for infrastructure that supports growth in Southwark.

491. The proposal is a CIL chargeable development because it comprises over 100sqm of new build. The site is located within Southwark CIL Zone 2 and MCIL2 Band 2 Zone. Based on the GIA obtained from CIL Form 1 dated 20-Dec-24 and Accommodation Schedule (Rev.13-Dec-24), the gross amount of CIL is £1,332,519 ,of which Mayoral CIL circa £433k and Borough CIL circa £900k. It should be noted that this is an estimate and subject to change, as floor areas will be measured and checked when related CIL Assumption of Liability is submitted after planning approval has been secured

Community involvement and engagement

492. This application was accompanied by a Statement of Community Involvement, confirming the public consultation that was undertaken by the applicant during the pre-application phase. The table below summarises this consultation:

Table 20: Consultation undertaken by applicant: Summary table	
Date	**Form of consultation**
Emails (Pre-application phase)	
December 2024	• Old Kent Road ward councillors • Tustin Estate TRA
Public Consultation Events (pre-application phase)	
N/A	• N/A

The Statement of Community Involvement provides a justification for why public consultation has not been undertaken for the current proposal. While this is not ideal, the applicant did carry out public consultation for both the extant and expired permissions, which share broadly the same building envelope as the current scheme, albeit with a different proposed use. On balance, although the pre-application consultation for the current proposal was limited, it is considered to represent a just adequate effort to engage with those affected on this instance.

493. Although no direct community engagement was undertaken by the application at the planning application stage, following closure of the Council's public consultation process, the applicant prepared a 'response' letter together with additional documentation addressing the matters raised. The extent and format of application stage community engagement is considered adequate.

494. The Council, as part of its statutory requirements, sent letters to surrounding residents, issued a press notice publicising the planning application and displayed notices in the vicinity of the site. Details of the consultation

undertaken by the Council are set out in the appendices. The responses received are summarised earlier in this report.

495. Consultation responses from external consultees

496. Arqiva

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

497. Environment Agency

- No objections subject to the following conditions:
  - Contamination remediation scheme
  - Remediation strategy detailing of unsuspected contamination
  - Contamination remediation verification report
  - No drainage systems for infiltration of surface water drainage into the ground without LPA's express consent
  - No piling or any other foundation designs using penetrative methods without LPA's express consent
  - ***Officer response:*** The recommended conditions have been included.

Greater London Authority

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

- Land use principles: The proposed PBSA-led intensification with the provision of 225.5 sqm.of commercial floor space within the Old Kent Road Opportunity Area is supported in land use terms in line with London Plan Policies SD1, H15, S1 and Good Growth Objective GG2.

  Officer response: *Noted.*

- Affordable housing: The proposed scheme is providing affordable housing as a cash in lieu payment of £6,760,000 with no on-site affordable housing proposed. The GLA Viability Team's appraisal indicates that the scheme could support up to £15.21 million. Appropriate review mechanisms should also be secured as necessary

  Officer response: *As discussed in the earlier part of this report, during the course of the application, with further review of the evidence provided the Applicant and the uplift in PIL, the Council's viability assessor BPS has confirmed that an in-lieu payment of £7,689,500, equivalent to 35% of the habitable rooms (60 habitable rooms) falls within a reasonable margin of 1% of the*

Gross Development Value (GDV) in BPS's appraisal. Taking into account the likely abnormal costs and comparisons with financial viability reviews of nearby consented PBSA schemes, officers considered that the proposed offer represents the maximum viable contribution, subject to early-stage review mechanisms.

- Urban design: Further consideration is suggested for the form of the base of the building and articulation of entrances to assist with wayfinding.

  Officer response: *The applicant has amended the scheme to address the feedback. The Council's Urban Design Officer is satisfied with the revised design.*

- Transport: Improvements for active transport should be secured alongside contributions towards enabling improved bus services and for cycle hire. A Grampian restriction may be required on the residential uplift if the development exceeds the pre BLE cap. There is a proposed under-provision of cycle parking and refinements to cycle parking quality are required. Further work is required in relation to the Construction Logistics, Delivery and Servicing, the Travel Plan and Student Move In and Out plans and all should be secured in line with London Plan policy.

  Officer response: *The Applicant has confirmed commitment to the financial contribution to the public transport improvement and cycle hire.*

  Officers have clarified with TFL and confirmed that given the extant permission 20/AP/3560, the site is within Phase 1 and a Grampian restriction is not necessary.

  As discussed in the earlier part of this report, the cycle parking provision has improved during the course of this application. TFL has broadly satisfied with the revised proposal.

  The Applicant has also revised the Construction Logistics Plan, Delivery and Servicing Plan, Travel Plan and Student Move-in Move out plans. Conditions are also recommended to ensure final details and compliance. Officers considered that the issues have been broadly addressed and any technical matters and S106 obligations can be resolved at the GLA Stage II referral.

- Sustainable development and environmental issues: Further information on the proposed energy strategy, whole life-cycle carbon assessment, circular economy assessment are required and details of trees to be retained on site. A commitment to post-completion reporting prior to occupation on whole life-cycle carbon and circular economy matters should be secured.

Officer response: *These technical details have also been updated. GLA officers have been re-consulted. Conditions are also recommended to ensure final details and compliance. Officers considered that the issues have been broadly addressed and any technical matters and S106 obligations can be resolved at the GLA Stage II referral.*

Historic England

499.
- No objection/comments.
  - ***Officer response:*** Noted.

London Borough of Lewisham

500.
- No objection. Regard should be paid to the now approved development at Surrey Canal Triangle (DC/20/119706), particularly in relation to car parking, servicing and construction logistics. The development is expected to make a proportionate contribution to any highways / pedestrian and cycling improvements required arising from the proposed scheme as part of a s106 financial contribution or s278 highway works.
  - ***Officer response:*** *The development is car free. A final Construction Logistics Plan is secured through conditions. Final Delivery and Servicing Plan together with a bond is secured through S106 obligations. Financial contributions towards improvement to public transport and cycle hire have been secured too. S278 highway works are also secured.*

London Fire and Emergency Planning Authority

501.
- Did not wish to comment.

Metropolitan Police

502.
- The proposed development, expected to increase the local population by about 195 people, will inevitably increase demand for policing services. Metropolitan Police anticipates using rates and Home Office revenues to pay for staff salaries and their routine day-to-day costs (e.g. call charges for telephony and radios, vehicle maintenance, etc.). So the Metropolitan Police currently does not have other funding resources for the capital infrastructure required by the development.
- To meet this increased demand without straining existing resources and compromising service levels, a financial contribution of £17,023.70 towards equipping staff and police vehicles is requested.
- Case law and appeal decisions have been provided to support the requested contribution.
- Without this contribution, the Metropolitan Police formally objects to the development.

- ***Officer response:*** *It is not clear why the negotiations for funding for the next financial year do not, or could not, take into account population growth during that year, given that forces' funding has an element for future population growth. This would need to be clearly demonstrated to justify any S106 contributions, as highlighted in the case The University Hospitals of Leicester NHS Trust, R (On the Application Of) v Harborough District Council [2023] EWHC 263 (Admin)*

- *Planning permission for 59 residential dwellings were granted 20/AP/3569 in 2023, which are expected to accommodate 172 residents based on the number and size of bedrooms in each unit and the extant permission does not include such a contribution. This application proposing 169 bedspaces would accommodate slightly fewer residents. It is therefore considered such contribution is not necessary to make the development in acceptable in planning terms.*

- *Additionally, the basis for the Met Police's requested contribution of £17,023.70 is not clearly explained in the Notes on Calculator Methodology or any other submitted documents. The cited population uplift of 195 people in the main letter appears to be inaccurate, as the proposed development will accommodate 169 student bedspaces.*

- *In light of the above, officers consider that the requested contribution is not justified and would not meet the three tests set out Community Infrastructure Levy Regulation 122*

National Air Traffic Services (NATS) Safeguarding

503.
- No objection/comments.
  - ***Officer response:*** Noted.

National Grid UK Transmission

504.
- Did not wish to comment.

National Planning Casework Unit

505.
- Did not wish to comment.

Natural England

506.
- Did not wish to comment

Network Rail

507.

- The applicant/developer must engage with Network Rail's Asset Protection and Optimisation (ASPRO) team before work begins to ensure the work doesn't risk the operational railway. The applicant/developer may need to enter into an Asset Protection Agreement.

  - ***Officer response:*** *An informative about the Assets Protection Agreement has been attached in the draft decision notice.*

NHS Healthy Urban Development Unit (HUDU)

508.

- Using the HUDU model based on the 169 student bedspaces, a total healthcare (primary, acute and mental health) capital costs is £255,047. Hence, HUDU requested a financial contribution of £27,151 towards such healthcare capital costs. This money can be used for fitout the future Old Kent Road Health Hub.

  - ***Officer response:*** *Planning permission for 59 residential dwellings were granted 20/AP/3569 in 2023, which are expected to accommodate 172 residents based on the number and size of bedrooms in each unit and the extant permission does not include such a contribution. This application proposing 169 bedspaces would accommodate slightly fewer residents. It is therefore considered such contribution is not necessary to make the development in acceptable in planning terms.*

509. Rail for London

- No objection. As the site is situated close to Rail for London Infrastructure, it will need to be demonstrated to the satisfaction of RfL that the development will not have any detrimental effect on RfL Infrastructure & Operations in the short or long term. Rail for London request a condition to request the Applicant to enter an Asset Protection Agreement.

  - ***Officer response:*** An Asset Protection Agreement is a civil matter between the Applicant and the Rail for London. An informative has therefore attached to remind the Applicant to do so.

Thames Water

510.

- No objections subject to recommended conditions to secure piling method statement, confirmation of the foul water capacity and surface water capacity, and water network upgrades or agreement on development and Infrastructure Phasing Plan. Some informatives are also suggested.

  - ***Officer response:*** *The conditions are recommended.*

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

511. • No objection.

Transport for London (TfL) – Spatial Planning

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

UK Power Networks

513. • Did not wish to comment.

Community impact and equalities assessment

514. 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.

The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.

515. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Right

516. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application. The positive impacts have been identified throughout this report. They include:

- Accommodation - accessibility: 7.7% of the PBSA would be wheelchair accessible, as would all of the ancillary and common spaces within the host buildings.
- Employment and training opportunities: Local unemployed people would benefit from jobs and training opportunities connected with the construction stage.
- Improved and more accessible public realm: The proposed public realm, as well as the agreed improvements to footways and highways within the vicinity of the site, would all be designed to assist people with mobility impairments. Physical measures such as level or shallow gradient surfaces and dropped kerbs would benefit disabled and older people in particular.
- Public safety: Safer public spaces (through the various proposed active and passive security and surveillance measures) would benefit all groups, but in particular older people, disabled people, women, LGBTQIA+ people and transgender people. Cycle stores and entrances would be secure-accessed, well naturally surveilled and lobbied to prevent tail-gaiting, complemented by CCTV surveillance.
- Religious groups: To the further north, there is a church on the opposite of Ilderton Road. Given the distance, it is not considered that this development would prejudice the operation of the church in any way.
- Transport: Wheelchair parking spaces and cargo bike spaces (the latter being capable of transporting disabled users) would also provided.

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

517. 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.

This application has the legitimate aim of redeveloping the site for comprehensive development comprising 169 purpose built student accommodation units and light industrial units. 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.

518.

Table 21: Positive and proactive engagement: Summary table	
Was the pre-application service used for this application?	NO
If the pre-application service was used for this application, was the advice given followed?	N/A
Was the application validated promptly?	YES
If necessary/appropriate, did the case officer seek amendments to the scheme to improve its prospects of achieving approval?	YES

CONCLUSION

519. This application would bring into productive and optimised re-use this underutilised site, providing a complementary mixture of students homes and light industrial unit which would active the frontages on Ilderton Road and Hornshay Street within the Old Kent Road Opportunity Area which would support the aspirations of the Old Kent Road Opportunity Area as set out in the adopted site allocation (NSP70) and the draft site allocation (OKR16).

520. There is support in the London Plan and Southwark Plan and draft OKR AAP for student housing, which helps to release local family housing and is counted towards the borough's housing delivery. In a well-connected location with some HEIs a short bus ride away, the site is considered to be appropriate for student accommodation, meeting a demonstrable need and achieving compliance with the requirements of Southwark Plan Policy P5. The proposal would be a direct-let scheme and would not include any affordable student rooms.

521. This application has emerged from the applicant's ongoing difficulty in securing interest from a registered provider for the extant permission 20/AP/3560 for mixed-tenure conventional housing. Despite efforts since 2020, no registered provider has come forward, largely due to current market challenges and specific site constraints—including the limited quantum of affordable homes, the absence of separate cores, and the building's height within the extant consent, which is a consequence of the small and triangular shape of the plot. These same concerns are also relevant to the current scheme 24/AP/3819. The applicant has also demonstrated that reasonable efforts were made to secure off-site provision of conventional affordable housing on nearby sites; however, no interest was received from the respective landowners. The Applicant therefore has demonstrated that on-site and off-site conventional affordable homes are not feasible or deliverable. As no conventional affordable housing is proposed within the redevelopment, a payment-in-lieu is proposed of £7,689,500 (index-linked), which equates to 35% affordable housing by habitable room. The payment-in-lieu could potentially be used to directly support the delivery of affordable housing close to the application site. While the lack of any on-site conventional affordable homes means the proposal is inherently less likely to contribute to a mixed

and inclusive neighbourhood than it might otherwise, the impact would not be substantial enough to outweigh the benefits of using brownfield land for meeting identified housing needs both directly through the on-site delivery of student accommodation and the payment-in-lieu and indirectly through the release of local family housing.

522. The current scheme 24/AP/3819 remains within the building envelope of the extant permission 20/AP/3560. The designs have been amended to address concerns raised by officers. The latest proposals are reflective of the buildings' quality along eastern side of Ilderton Road within the Opportunity Area where tall buildings are anticipated. The buildings would contribute positively to the local townscape. Through optimised active frontages and celebrated entrances, the development would provide an engaging and animated interface at street level.

523. Transport and highways matters have been satisfactorily addressed by the application documents, with detailed arrangements and mitigation to be secured through planning conditions and obligations.

524. In terms of energy and sustainability, the proposals would meet the London Plan 35% target, achieving cumulative carbon savings of 37% against the Part L 2021 baseline. The proposals would meet the Mayor's Whole Life Cycle benchmarks. Subject to compliance with the detailed energy and sustainability strategies submitted with the planning application and payment of the Carbon Green Fund, the development satisfactorily addresses climate change policies.

525. The proposals would also deliver environmental benefits, including improved urban drainage through a reduced surface water run-off rate, enhanced local biodiversity, and increased greening. These would be achieved through on-site measures such as green and intensive roofs, permeable paving, and off-site through a financial contribution towards the planting of new trees.

526. It is therefore recommended on balance that planning permission is granted, subject to:

- conditions as set out in the attached draft decision notice;
- referral to the GLA;
- the timely completion of a Section 106 Agreement;

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Application file: 24/AP/3819 Southwark Local Development Framework and Development Plan Documents	Resources Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer email: Pan.chong@southwark.gov.uk Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Recommendation (draft decision notice)
Appendix 2	Relevant planning policy
Appendix 3	Planning history of the site and nearby sites
Appendix 4	Consultation undertaken
Appendix 5	Consultation responses received
Appendix 6	Section 106 heads of terms

AUDIT TRAIL

Lead Officer	Stephen Platts, Director of Planning and Growth
Report Author	Pan Chong, Team Leader
Version	Final
Dated	20 August 2025
Key Decision	No

CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	**Comments Sought**	**Comments included**
Strategic Director, Resources	No	No
Strategic Director, Environment, Sustainability and Leisure	No	No
Strategic Director, Housing	No	No
Date final report sent to Constitutional Team		28 August 2025

APPENDIX 1

Recommendation (draft decision notice)

Town and Country Planning Act 1990 (as amended)

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

RECOMMENDATION (DRAFT DECISION NOTICE)

LBS Reg. No.: 24/AP/3819 **Date of Issue of Decision:** N/A

Applicant Mr Josh Chadd
TLS (Ilderton Road) Limited

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

Demolition of the existing buildings and construction of a 15-storey building comprising Purpose-Built Student Accommodation (Use Class Sui Generis) and commercial floorspace (Class E(g)), with landscaping, cycle parking and associated ancillary development.

At: 301-303 Ilderton Road London Southwark SE15 1NW

In accordance with the valid application received on 27 February 2025 and supporting documents submitted which can be viewed on our Planning Register.

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

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

Conditions

Permission is subject to the following Approved Plans Condition:

1. **APPROVED PLANS**

The development shall be carried out in accordance with the following approved plans:

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

Permission is subject to the following Time Limit:

2. . **TIME LIMIT**

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

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

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

3. . **ARCHAEOLOGICAL EVALUATION**

a) Notwithstanding the Archaeological Evaluation Written Scheme of Investigation prepared by RPS dated February 2023, before any work hereby authorised begins, [excluding demolition to slab level and site investigation works] a revised written scheme of investigation shall be submitted to and approved in writing by the Local Planning Authority.

The revised written scheme of investigation shall include an archaeological evaluation that is accompanied by a new search of the historic environment record.

b) The evaluation works shall be undertaken following the demolition of buildings presently occupying the site. Depending upon the results of this work, further archaeological recording shall be undertaken where appropriate.

c) Before any work hereby authorised begins, [excluding demolition to slab level and site investigation works] the applicant shall secure the implementation of a programme of archaeological evaluation works in accordance with the approved written scheme of investigation in part (a) 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).

4. . **ARCHAEOLOGICAL MITIGATION**

Before any work hereby authorised begins, [excluding archaeological evaluation, demolition to slab level, and site investigation works] the applicant shall secure the implementation of a programme of archaeological mitigation works in accordance with a written scheme of investigation, which shall be submitted to and approved in writing by the Local Planning Authority.

Reason: In order that the details of the programme of works for the archaeological mitigation are suitable with regard to the impacts of the proposed development and the nature and extent of archaeological remains on site in accordance with Policy P23 Archaeology of the Southwark Plan (2022) and the National Planning Policy Framework (2024).

5. . **ARCHAEOLOGICAL PRE-COMMENCEMENT FOUNDATION AND BASEMENT DESIGN**

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)

6. . **PILING METHOD STATEMENT**

(a) No piling shall take place until a piling method statement has been submitted to and approved in writing by the local planning authority in consultation with Thames Water and Environment Agency.

The statement shall include the following:

i. the depth and type of piling to be undertake.
ii. the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure;
iii. the programme for the works;
iv. 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; and
iv. piling risk assessment demonstrating that there is no resultant unacceptable risk to groundwater.

(b) Any piling must be undertaken in accordance with the terms of the approved details.

Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling or other penetrative methods of foundation design has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure and potentially result in unacceptable risks to underlying groundwaters if on contaminated sites.

7. . **DRAINAGE DETAILS**

(a) No works (excluding demolition and site clearance) shall commence until full details of the proposed surface water drainage system incorporating Sustainable Drainage Systems (SuDS) have been submitted to and approved in writing by the Local Planning Authority, including detailed design, size and location of attenuation units and details of flow control measures.

The strategy should achieve a reduction in surface water runoff rates during the 1% Annual Exceedance Probability (AEP) event plus climate change allowance, as detailed in the Flood Risk Assessment and Indicative Surface Water Drainage Strategy prepared by RKS, dated 02/08/2018 and the 681708-R1(1) - LLFA Response prepared by RSK dated 15th April 2025.

The applicant must demonstrate that the site is safe in the event of blockage/failure of the system, including consideration of exceedance flows.

(b) The site drainage must be constructed to the approved details.

Reason: To minimise the potential for the site to contribute to surface water flooding in accordance with Southwark's Strategic Flood Risk Assessment (2017) and Policy SI 13 of the London Plan (2021).

8. . **FINAL GROUND PLANE SPOT LEVELS PLAN**

Prior to the commencement of the development hereby consented a detailed Final Ground Plane Spot Levels Plan shall be submitted to and approved in writing by the Local Planning Authority showing:

- the proposed finished floor levels in each of the ground floor rooms within the proposed development, including any stepped or raised areas;
- the gradients and falls of any sloped or ramped parts of the ground floor rooms within the proposed development;
- regular proposed spot levels across all external areas of the site, adjacent footway and adjacent highways; and
- level access thresholds (wherever feasible) from external areas into the interior spaces.

REASON:
To ensure a high quality and accessible public realm is delivered that relates to the internal ground floor environment and adjacent highway/footway network in a safe and rational way, in accordance with: the National Planning Policy Framework 2024; Policies Policy D4 (Delivering Good Design) and D5 (Inclusive Design), D8 (Public Realm) and T2 (Healthy Streets) of the London Plan 2021; and Policies P13 (Design of Places), P14 (Design Quality), P50 (Highways impacts), P51 (Walking), P53 (Cycling) of the Southwark Plan 2022.

9. **CONSTRUCTION LOGISTICS PLAN**

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

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

i) Purpose Built Student Accommodation
ii) Light industrial units

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

stop will remain open and operational.

b) The development shall not be carried out otherwise than in accordance Construction Logistics Plan or any amendments thereto.

Reason: To ensure that construction works do not have an adverse impact on the transport network and to minimise the impact of construction activities on local air quality, in accordance with the National Planning Policy Framework (2024); T1 (Strategic approach to transport), Policy T4 (Assessing and mitigating transport impacts), Policy T7 (Deliveries, servicing and construction), Policy SI 1 (Improving air quality) of the London Plan (2021); Policy P56 (Protection of amenity) of the Southwark Plan (2022).

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

10.. **CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN**

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

o A detailed specification of demolition and construction works of development including consideration of all environmental impacts and the identified remedial measures and compliance wth the recommendations in Preliminary Ecological Appraisal & Preliminary Roost Assessment (Issue 2) prepared by Matthew Game Consultancy;

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

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

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

o A commitment to adopt and implement of the ICE Demolition Protocol and Considerate Contractor Scheme; Site traffic - Routing of in-

bound and outbound site traffic, one-way site traffic arrangements on site, location of lay off areas, etc.;

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

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

To follow current best construction practice, including the following:

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

o Section 61 of Control of Pollution Act 1974;

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

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

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

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

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

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

o Relevant Stage emission standards to comply with Non-Road Mobile Machinery (Emission of Gaseous and Particulate Pollutants) Regulations 1999 as amended & NRMM London emission standards (https://nrmm.london).

All demolition and construction work shall be undertaken in strict accordance with the approved CEMP and other relevant codes of practice, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that occupiers of neighbouring premises and the wider

environment do not suffer a loss of amenity by reason of pollution and nuisance, in accordance with the National Planning Policy Framework (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.. **UPDATED CIRCULAR ECONOMY STATEMENT**

a) Prior to the commencement of development, including demolition, an updated Circular Economy Statement demonstrating compliance with Part B of Policy SI 7 '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's and 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.

b) The development hereby permitted shall be carried out in accordance with the approved Circular Economy Statement.

Reason:
To promote resource conservation, waste reduction, material re-use, recycling and reduction in material being sent to land fill in compliance with Policy SI 7 of the London plan 2021.

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

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

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

b) unless otherwise agreed in writing by the Local Planning Authority, full scale mock-ups of the facades shall be presented on site (or near to the site) for each building and approved in writing by the Local Planning Authority (the detailed scope of mock up requirements to have been agreed with the Local Planning Authority in advance of them being constructed and

presented on site).

The materials shall also reflect the recommendations from the updated Circular Economy Statement in condition 11 and Whole Life Carbon Assessment dated 23 December 2024 and GLA Whole Life Carbon Assessment spreadsheet dated 9 May 2025
prepared by Complete Sustainability Solutions

c) The development shall not be carried out other than in accordance with any such approval given.

REASON:
In order that the Local Planning Authority may be satisfied that these samples will make an acceptable contextual response in material terms, will achieve a high quality of design and detailing, and are consistent with the consented scheme, in accordance with: the National Planning Policy Framework 2024 Policy D4 (Delivering Good Design) of the London Plan 2021; and Policies P13 (Design of Places) and P14 (Design Quality) of the Southwark Plan 2022

13.. **SECTION DETAIL-DRAWINGS**

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

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

of the proposal to be constructed in the carrying out of this permission, shall be submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with any such approval given.

REASON:
In order to satisfy the Local Planning Authority that the construction details will achieve a high quality of design and detailing, are suitable in context and are consistent with the consented scheme, in accordance with: the National Planning Policy Framework 2024; Policy D4 (Delivering Good Design) of the London Plan 2021; and Policies P13 (Design of Places) and P14 (Design Quality) of the Southwark Plan 2022.

14.. **INTERNAL VENTILATION - PRE APPROVAL FOR NOISE AND OVERHEATING RISK**

a) The use hereby permitted shall not commence until full particulars and details of a scheme for the internal ventilation of the development have been submitted to and approved by the Local Planning Authority.

The scheme shall include appropriately located plant, inlets and outlets; details of active cooling and a management and maintenance plan

b) 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 National Planning Policy Framework (2024), Policy SI4 of London Plan (2021) and the Policy P56 (Protection of amenity) of Southwark Plan (2022)

Permission is subject to the following Grade Condition(s)

15.. **HARD AND SOFT LANDSCAPING**

a) Before any above grade work hereby authorised begins, detailed drawings of a hard and soft landscaping scheme showing the treatment of all parts of the site not covered by buildings shall be submitted to and approved in writing by the Local Planning Authority. The site shall be landscaped strictly in accordance with the approved details in the first planting season after completion of the development. Details shall include:

i) a scaled plan showing all existing vegetation and landscape features to be retained with proposed trees, hedging, perennial and other plants;
ii) proposed parking, access, or pathway layouts, materials and edge

details;

iii) location, type and materials to be used for hard landscaping including specifications, where applicable for:
a) permeable paving
b) tree pit design
c) underground modular systems
d) sustainable urban drainage integration
e) use within tree Root Protection Areas (RPAs);

iv) typical cross sections;

v) a schedule detailing sizes and numbers/densities of all proposed trees/plants;

vi) specifications for operations associated with plant establishment and maintenance that are compliant with best practise; and

vii) types and dimensions of all boundary treatments.

The landscape planting shall contain a minimum of 60% of plants on the Royal Horticultural Society perfect for Pollinators list.

Any railings in these gaps on the western perimeter of the roof terrace shall have angled bars, to give 50% porosity when viewed straight on in accordance with the recommendations in the Wind Microclimate Assessment Report prepared by GIA dated 07.12.2021

b) There shall be no excavation or raising or lowering of levels within the prescribed root protection area of retained trees unless agreed in writing by the Local Planning Authority.

d) The landscaping shall not be carried out otherwise than in accordance with any such approval given and shall be retained for the duration of the use. Any trees, shrubs, grass or other planting that is found to be dead, dying, severely damaged or diseased within five years of the completion of the building works OR five years of the carrying out of the landscaping scheme (whichever is later), shall be replaced in the next planting season by specimens of the equivalent stem girth and species in the first suitable planting season.

e) Unless required by a separate landscape management condition, all soft landscaping shall have a written five-year maintenance programme following planting.

f) Works shall comply to BS: 4428 Code of practice for general landscaping operations, BS: 5837 (2012) Trees in relation to demolition, design and

construction; BS3998: (2010) Tree work - recommendations, BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf); EAS 03:2022 (EN) - Tree Planting Standard.

Reason:
So that the Council may be satisfied with the details of the landscaping scheme, in accordance with: Chapters 8, 12, 15 and 16 of the National Planning Policy Framework 2024; Policies SI 4 (Managing heat risk), SI 13 (Sustainable drainage), G1 (Green Infrastructure, G5 (Urban Greening) and G7 (Trees and Woodlands) of the London Plan 2021; 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).

16.. **DIGITAL CONNECTIVITY INFRASTRUCTURE STRATEGY**

a) Prior to any above grade works for the development hereby approved, detailed plans shall be submitted to and approved in writing by the Local Planning Authority demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development.

b) The development shall be carried out in accordance with the approved plans and maintained as such for the lifetime of the development.

Reason: To provide high quality digital connectivity infrastructure to contribute to London's global competitiveness, in accordance with the National Planning Policy Framework (2024)); Policy SI 6 (Digital connectivity infrastructure) of the London Plan (2021); Policy P44 of the Southwark Plan (2022).

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

17.. **INTERNAL NOISE LEVEL REQUIREMENTS FOR THE RESIDENTIAL USES**

a) The student accommodation hereby permitted shall be designed to ensure that the following internal noise levels are not exceeded due to environmental noise:
Bedrooms: 35dB LAeq T#, 30 dB LAeq T*, 45dB LAFmax T *
Living and Dining rooms- 35dB LAeq T #

* - Night-time - 8 hours between 23:00-07:00
- Daytime - 16 hours between 07:00-23:00

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 National Planning Policy Framework 2024; Policy D14 (Noise) of the London Plan 2022; and Policies P56 (Protection of Amenity) and P66 (Reducing Noise Pollution and Enhancing Soundscapes) of the Southwark Plan 2022.

18. **GYM HEALTH AND FITNESS INTERNAL SOUND TRANSFER - PRE APPROVAL**

a) The noise control scheme (including sound insulation and isolation measures) implemented in order to minimise as far as practicable both airborne noise and structure-borne noise from the use of the health and fitness studios/gym ancillary to the development hereby permitted, 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 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/below or adjoining the health and fitness studio or Gym.

Impact noise (airborne & structure-borne) health and fitness activity noise shall be no greater than G20 LMax, in accordance with ProPG:GAG2023 methodology in any structurally adjoining habitable areas of residential properties located above/below or adjoining the health and fitness studio or Gym.

b) Following completion of the development, validation testing shall be completed to assess that the noise scheme of works has been successfully implemented to the design expectations.

c) Prior to the first commencement of the use of the health and fitness studios/gym ancillary to the development hereby permitted, a compliance report shall be submitted to and approved by the Local Planning Authority.

d) 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 National Planning Policy Framework (2024), Policies P56 (Protection of amenity) and P66 (Reducing noise pollution and enhancing soundscapes) of Southwark Plan (2022)

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

a) Party walls, floors and ceilings between the commercial premises, plant room and student accommodation (including private rooms and internal communal amenity space) shall be designed to achieve a minimum weighted standardized level difference of 60dB DnTw+Ctr.

b) Prior to first occupation of any part of the development, the following shall be submitted to and approved in writing by the Local Planning Authority:

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

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

Reason
To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of noise nuisance and other excess noise from activities within the commercial premises in accordance with: the National Planning Policy Framework 2024; and Policies P56 (Protection of Amenity); Policy P66 (Reducing Noise Pollution and Enhancing Soundscapes) of the Southwark Plan (2022).

20. **PLANT NOISE - PRE APPROVAL**

a) The Rated sound level from any plant, together with any associated ducting shall not exceed the Background sound level (LA90 15min) at the nearest noise sensitive premises. Furthermore, the plant Specific sound level shall be 10dB(A) or more below the background sound level in this location. For the purposes of this condition the Background, Rating and Specific sound levels shall be calculated in full accordance with the

methodology of 'BS4142:2014 +A1:2019'. Suitable acoustic treatments shall be used to ensure compliance with the above standard.

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

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

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

Reason
To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance or the local environment from noise creep due to plant and machinery in accordance with the Policies P56 (Protection of amenity), P66 (Reducing noise pollution and enhancing soundscapes) of Southwark Plan (2022) and the National Planning Policy Framework (2024)

21.. **EXTERNAL LIGHTING**

a) 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:

i) 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

ii) 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.

b) Before any external lighting is installed, full details of the external lighting (including: design; power and position of luminaries; light intensity contours) of all affected external areas (including areas beyond the boundary of the development) shall be submitted to and approved by the

Local Planning Authority in writing.

The details shall demonstrate compliance with the lighting design strategy for biodiversity approved in part (a), Institute of Lighting Professionals (ILE) Guidance Note 1 for the reduction of obtrusive light (2021) and principles and objectives of Secured by Design.

c) All external lighting shall be installed in accordance with the specifications and locations set out in approved details under part (b), and these shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.

Reason: To ensure compliance with the Habitats Regulations and the Wildlife and Countryside Act 1981 (as amended), and because bats are known to be active in the vicinity of the development site, as well as in the interest of the visual amenity of the area, the amenity and privacy of adjoining occupiers, and their protection from light nuisanceï¿½while ensuring that external areas are adequately lit for safety and security, in accordance with the National Planning Policy Framework (2024); Policies G6 (Biodiversity and access to nature) and D11 (Safety Security and Resilience to Emergency) of the London Plan (2021), Policies P16 (Design out Crime), P56 (Protection of amenity) and P60 (Biodiversity) of the Southwark Plan (2022).

22.. **DRAINAGE VERIFICATION REPORT**

The development hereby permitted shall not be occupied until a drainage verification report prepared by a suitably qualified engineer has been submitted to and approved in writing by the Local Planning Authority.

The report shall provide evidence that the drainage system (incorporating SuDS) has been constructed according to the approved details and specifications as detailed in the Indicative Surface Water Drainage Strategy prepared by RKS, dated 02/08/2018 and the 681708-R1(1) - LLFA Response prepared by RSK dated 15th April 2025.

Plans, photographs and national grid references of key components of the drainage network such as surface water attenuation structures, flow control devices and outfalls shall be included.

The report shall also include details of the responsible management company.

Reason: To ensure the surface water drainage complies with Southwark's Strategic Flood Risk Assessment and Policy SI 13 of the London Plan

(2021).

23.. **THAMES WATER SURFACE WATER CAPACITY**

No development shall be occupied until confirmation has been provided that either:-

1. Surface water capacity exists off site to serve the development or
2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. 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. Or
3. All Surface water network upgrades required to accommodate the additional flows from the development have been completed.

The evidence of the confirmation shall be submitted to and approved in writing by the Local Planning Authority in consultation with Thames Water

Reason - Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid flooding and/or potential pollution incidents.

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

No development shall be occupied until confirmation has been submitted to and approved in writing by the Local Planning Authority in consultation with Thames Water that either:

- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or
- a 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.

Reasons: Additional demand will arise from the development hereby consented, which may result in low or no water pressures, and as such the provision of reinforcement works are anticipated to ensure there is sufficient capacity within the off-site water infrastructure network, in accordance with: the National Planning Policy Framework (2024); Policy SI5 (Water Infrastructure) of the London Plan (2021); and Policy P67 (Reducing Water Use) of the Southwark Plan (2022).

25.. **THAMES WATER FOUL WATER CAPACITY**

No development shall be occupied until confirmation has been submitted to and approved in writing by the Local Planning Authority in consultation with Thames Water that either:

1. Foul water Capacity exists off site to serve the development, or
2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. 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, or
3. All Foul water network upgrades required to accommodate the additional flows from the development have been completed.

Reason - Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents.

26.. **LANDSCAPE AND ECOLOGICAL MANAGEMENT PLAN**

a) Prior to the occupation of the development or any phase of the development, whichever is the sooner, a landscape management plan, including long term design objectives to meet BNG requirements, management responsibilities and maintenance schedules for all landscape areas, other than small, privately owned, domestic gardens, shall be submitted to and approved by the Local Planning Authority.

Details of an irrigation schedule shall be provided for all trees to ensure successful establishment.

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.

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

c) 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.

d) 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 2024; Policies SI 4 (Managing heat risk), SI 13 (Sustainable drainage), G1 (Green Infrastructure, G5 (Urban Greening) and G7 (Trees and Woodlands) of the London Plan 2021; 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).

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

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

This should be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk, along with any supporting evidence as per the guidance.

Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority, prior to occupation of the building hereby permitted.

Reason: In the interests of sustainable development and to maximise on-site carbon dioxide savings in compliance with the National Planning Policy Framework (2024); Policy SI 2 (Minimising Greenhouse Gas Emissions) of the London Plan (2021) and Policy P70 (Energy) of the Southwark Plan (2022).

Permission is subject to the following Compliance Condition(s)

28.. **RESTRICTION: HOURS OF USE OF THE NON-RESIDENTIAL USES**

The opening hours of the non-residential uses hereby permitted shall be limited to 07:00 - 23:00 daily.

Reason
To safeguard the amenity of neighbouring residential properties in accordance with the Policies P56 (Protection of amenity) and P66 (Reducing noise pollution and enhancing soundscapes) of Southwark Plan (2022) and the National Planning Policy Framework (2024)

29.. **RESTRICTION: NO INSTATEMENT OF TELECOMMUNICATIONS EQUIPMENT**

Notwithstanding the provisions of Schedule 2, Part 16 of the Town & Country Planning (General Permitted Development) (England) Order 2015 [as amended or re-enacted] no external telecommunications equipment or structures shall be placed on the roof or any other part of a building hereby permitted, unless otherwise approved by the Local Planning Authority.

REASON:

To ensure no telecommunications plant or equipment which might be detrimental to the design and appearance of the building and visual amenity of the area is installed on the roof of the building in accordance with: the National Planning Policy Framework 2024; Policy D4 (Delivering Good Design) of the London Plan 2021; and Policies P13 (Design of Places), P14 (Design Quality) and P56 (Protection of Amenity) of the Southwark Plan 2022.

30.. **RESTRICTION ON PERMITTED USES OF COMMERCIAL UNITS**

Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 1987 and any associated provisions of the Town and Country Planning General Permitted Development Order (including any future amendment of enactment of those Orders) 225 sqm of the commercial floorspaces hereby approved shall be used for use Class E (g) (iii) purposes only unless otherwise agreed by way of a formal application for planning permission.

Reason: In accordance with the application details and order to ensure that the site continues to provide employment floorspace which can accommodate light industrial uses in accordance with site allocation NSP70

and Policy P29 (Strategic protected industrial land) of the Southwark Plan (2022).

31.. **RESTRICTION: NO INSTATEMENT OF APPURTENANCES**

No meter boxes, flues, vents or pipes (other than rainwater pipes) or other appurtenances not shown on the approved drawings shall be fixed or installed on the elevations of the buildings, unless otherwise approved by the Local Planning Authority.

REASON:

To ensure such works do not detract from the appearance of the buildings in accordance with: the National Planning Policy Framework 2024; Policy D4 (Delivering Good Design) of the London Plan 2021; and Policies P13 (Design of Places), P14 (Design Quality) and P56 (Protection of Amenity) of the Southwark Plan 2022.

32.. **RESTRICTION: NO INSTATEMENT OF ROOF PLANT AND OTHER ROOF STRUCTURES**

No roof plant, equipment or other structures, other than as shown on the drawings hereby approved or discharged under an 'approval of details' application pursuant to this permission, shall be placed on the roof or be permitted to project above the roofline of any part of the building as shown on elevational drawings or shall be permitted to extend outside of the roof plant enclosure hereby permitted.

REASON:

To ensure no additional plant is placed on the roof of the building in the interest of the appearance and design of the building and the visual amenity of the area, in accordance with: the National Planning Policy Framework 2024; Policy D4 (Delivering Good Design) of the London Plan 2021; and Policies P13 (Design of Places), P14 (Design Quality) and P56 (Protection of Amenity) of the Southwark Plan 2022.

33. **CAR FREE MARKETING**

The materials/details used to market all of the for rental student homes hereby consented shall clearly identify the development as car free (excluding the permitted designated blue badge spaces).

REASON:

To encourage more sustainable travel and minimise the effect of the development on local air quality within the designated Air Quality Management Area, in accordance with: the National Planning Policy Framework 2024; Policy T6 (Car Parking) of the London Plan 2021; and Policy P54 (Car Parking) of the Southwark Plan 2022.

34.. **DELIVERY AND SERVICING HOURS**

Notwithstanding the details contained in any delivery and servicing plans or documents approved as part of any condition attached to this decision notice, all deliveries or collections to the non-residential parts of the development hereby approved shall only be between the following hours, unless otherwise approved by the Local Planning Authority:

- 06:00 to 20:00 Monday to Saturday; and
- 10:00 to 18:00 on Sundays and Bank Holidays.

REASON:
To ensure that the occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance, and to reduce vehicle movements on the local road network during peak times, in accordance with National Planning Policy Framework 2024, the Policy T7 (Deliveries, Servicing and Construction) of the London Plan (2021); and Policy P50 (Highways Impacts) of the Southwark Plan (2022)

35.. **COMPLIANCE TO OVERHEATING STRATEGY**

The development hereby approved shall be carried out in full accordance with the approved overheating strategy including installation of all passive and/or active measures to prevent overheating prior to first occupation of the development.

The approved passive and/or active measures to prevent overheating shall be retained and maintained for the lifetime of the development.

Reason: To ensure the development is designed and operated to minimise the risk of internal overheating and is an energy efficient building in accordance with Policy SI 4 (Managing heat risk) in the London Plan (2021), Policy P69 (Sustainability standards) in Southwark Plan (2022).

36. **FIRE SAFETY STRATEGY COMPLIANCE**

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The development hereby consented shall not be carried out other than in accordance with the approved Fire Statement - GLA London Plan Issue 02 dated February 2025 and Fire Statement- Gateway 1 Issue 02 dated February 2025 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 minimise the risk to life and minimise building damage in the event of a fire, in accordance with: the National Planning Policy Framework 2024 and; Policy D12 ('Fire safety') of the London Plan 2021.

37.. **CYCLE STORAGE COMPLIANCE**

The development hereby approved shall not be carried out other than in accordance with the cycle parking facilities (spaces, stand types, layout and access arrangements) as shown on the drawings hereby approved.

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

REASON:

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

38.. **REFUSE STORAGE COMPLIANCE**

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

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

REASON:

To ensure that the refuse will be appropriately stored within the site (thereby protecting the amenity of the site and the area in general from litter, odour and potential vermin/pest nuisance) and that it can be collected efficiently by collection service providers, in accordance with: the National Planning Policy Framework 2024; Policies SI7 (Reducing Waste and Supporting the Circular Economy) and T7 (Deliveries, Servicing and Construction) of the London Plan 2021; Policies P45 (Healthy

Developments), P50 (Highways Impacts), P56 (Protection of Amenity) and P62 (Reducing Waste) of the Southwark Plan 2022; and the Council's Waste Management Strategy Extension 2022-2025.

39.. **COMPLIANCE TO TREE PROTECTION MEASURES**

The existing trees on or adjoining the site which are to be retained shall be protected and both the site and trees managed in accordance with the recommendations (including facilitative pruning specifications and supervision schedule) contained in the Arboricultural Method Statement. All tree protection measures shall be installed, carried out and retained throughout the period of the works, unless otherwise agreed in writing by the Local Planning Authority. In any case, all works must adhere to BS5837: (2012) Trees in relation to demolition, design and construction and BS3998: (2010) Tree work - recommendations. If within the expiration of 5 years from the date of the occupation of the building for its permitted use any retained tree is removed, uprooted is destroyed or dies, another tree shall be planted at the same place and that tree shall be of such size and species, and shall be planted at such time, as may be specified in writing by the Local Planning Authority.

Reason: To avoid damage to the existing trees on the adjoining land which represent an important visual amenity in the area, in accordance with The National Planning Policy Framework 2024, ; Policies G1 (Green Infrastructure, G5 (Urban Greening) and G7 (Trees and Woodlands) of the London Plan 2021; and Policies P59 (Green Infrastructure), P60 (Biodiversity) and P61 (Trees) of the Southwark Plan 2022.

40.. **NO INFILFRATION OF SURFACE WATER DRAINAGE WITHOUT CONSENT**

No infiltration of surface water drainage into the ground is permitted other than with the written consent of the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason: To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P64 (Contaminated land and hazardous substances) and the National Planning Policy Framework (NPPF) 2024.

Permission is subject to the following Special Condition(s)

41.. **SITE CONTAMINATION-PRE-APPROVAL**

a) Prior to the commencement of development works, an intrusive site investigation and associated risk assessment shall be completed to fully characterise the nature and extent of any contamination of soils and ground water on the site.

b) In the event that contamination is found that presents a risk to future users or controlled waters or other receptors, a detailed remediation and/or mitigation strategy shall be prepared and submitted to the Local Planning Authority for approval in writing.

The strategy shall detail all proposed actions to be taken to bring the site to a condition suitable for the intended use together with any monitoring or maintenance requirements.

The scheme shall also ensure that as a minimum, the site should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

The approved remediation scheme (if one is required) shall be carried out and implemented as part of the development.

c) Following the completion of the works and measures identified in the approved remediation strategy and prior to occupation of the development hereby permitted, a verification report providing evidence that all works required by the remediation strategy have been completed, together with any future monitoring or maintenance requirements shall be submitted to and approved in writing by the Local Planning Authority.

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

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off-site receptors in accordance with the Policies P56 (Protection of amenity) and P64 (Contaminated land and

hazardous substances) of Southwark Plan (2022) and the National Planning Policy Framework (2024).

42.. **URBAN GREENING CERTIFICATION**

a) Before the first occupation of any part of the development hereby consented, an interim report/letter (together with any supporting evidence) from a suitably qualified landscape specialist shall be submitted to and approved in writing by the Local Planning Authority. The report/letter shall confirm that sufficient progress has been made in terms of detailed design, procurement and construction to be reasonably well assured that the development hereby approved will, once completed, achieve the agreed UGF score of 0.32.

b) Within six months of first occupation of the final building hereby permitted, post construction certificate prepared by a suitably qualified landscape specialist (or other verification process agreed with the Local Planning Authority) shall be submitted to and approved in writing by the Local Planning Authority, confirming that the agreed UGF score of 0.32 has been met.

REASON:
To ensure the proposal complies delivers the agreed UGF score, in accordance with: the National Planning Policy Framework 2024; Policy G5 (Urban Greening) of the London Plan 2021; and Polices SP6 (Climate Emergency), P13 (Design of Places), P59 (Green Infrastructure), P60 (Biodiversity) and P65 (Improving Air Quality) of the Southwark Plan 2022.

43.. **BIODIVERSITY ROOFS**

a) 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:

i) Intensive green roof or vegetation over structure with substrate minimum settled depth of 150mm;
ii) Laid out in accordance with UGF Sketch MTC041SK01 REV 00, Landscape Proposal JKD041P01 Rev 01 and roof plan 2220-P107-S3- P0 hereby approved; and
iii) 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).

b) 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.

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

d) 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 (2024); 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)

44.. **BAT ROOSTING FEATURES**

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

No less than 4 at tubes, bricks or boxes shall be provided and the details shall include the exact location, specification and design of the habitats. The bat tubes, bricks or boxes shall be installed with the development prior to the first occupation of the building to which they form part or the first use of the space in which they are contained.

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

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

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with the National Planning Policy Framework (2024); Policy G1 (Green Infrastructure), Policy G5 (Urban Greening), Policy G6 (Biodiversity

and access to nature) of the London Plan (2021); Policy P59 (Green infrastructure) and Policy P60 (Biodiversity) of the Southwark Plan (2022).

45.. **SWIFT NESTING FEATURES DETAILS**

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

No less than 6 Swift nesting bricks shall be provided and the details shall include the exact location, specification and design of the bricks.

(b) Evidence shall be submitted in writing to the Local Planning Authority to show that the nesting features have been installed in full in accordance with part (a)

(c) The nesting features shall be installed with the development prior to the first occupation of the building to which they form part or the first use of the space in which they are contained and maintained in perpetuity

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with National Planning Policy Framework (2024); Policy G1 (Green Infrastructure), Policy G5 (Urban Greening), Policy G6 (Biodiversity and access to nature) of the London Plan (2021); Policy P59 (Green infrastructure) and Policy P60 (Biodiversity) of the Southwark Plan (2022).

46.. **SECURE BY DESIGN**

a) The development hereby permitted shall incorporate security measures to minimise the risk of crime and to meet the specific security needs of the development, in accordance with the principles and objectives of Secured by Design.

Details of these measures shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of any above ground development and shall be implemented in accordance with the approved details prior to occupation.

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

Reason: In pursuance of the Local Planning Authority's duty under Section

17 of the Crime and Disorder Act (1998) to consider crime and disorder implications in exercising its planning functions and to improve community safety and crime prevention, in accordance with the National Planning Policy Framework (2024); Policy D11 (Safety Security and Resilience to Emergency) of the London Plan (2021); and Policy P16 (Designing out Crime) of the Southwark Plan (2022).

47.. **POST-COMPLETION CIRCULAR ECONOMY REPORTING**

Prior to the occupation [of the development/each phase of development], a postconstruction monitoring report should be completed in line with the GLA's Circular Economy Statement Guidance. The report should be submitted to and approved by the Local Planning Authority in writing.

REASON: To ensure the Planning Stage Circular Economy Statement has been implemented in the construction and delivery of the development, and that all on-going operational measures and mechanisms have been satisfactorily implemented, in order to achieve Circular Economy goals and in accordance with: the National Planning Policy Framework 2024; and Policies GG6 (Increasing Efficiency and Resilience) and SI7 (Reducing Waste and Supporting the Circular Economy) of the London Plan 2021; and Policy P62 (Reducing Waste) of the Southwark Plan 2022.

48.. **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).

49.. **COMMERCIAL KITCHEN EXTRACT VENTILATION DETAILS**

a) Prior to the commencement of any non-residential use involving the

cooking of food, full particulars and details of a scheme for the extraction and ventilation of the commercial kitchen shall be submitted to and approved by the Local Planning Authority. The scheme shall include:

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

b) Once approved the scheme shall be implemented in full and permanently maintained thereafter.

Reason: In order to ensure that any installed ventilation, ducting and ancillary equipment in the interests of amenity will not cause amenity impacts such as odour, fume or noise nuisance and will not detract from the appearance of the building in accordance with the National Planning Framework (2024); Policy P56 (Protection of amenity) and Policy P65 (Improving air quality) of the Southwark Plan (2022).

50.. **BREEAM CERTIFICATION**

a) Before the first occupation of the non-residential uses hereby consented, an interim report/letter (together with any supporting evidence) from the licensed BREEAM assessor shall be submitted to and approved in writing by the Local Planning Authority. The report/letter shall confirm that sufficient progress has been made in terms of detailed design, procurement and construction to be reasonably well assured that the commercial and PBSA elements of the development hereby approved will, once completed, achieve the agreed 'Excellent' BREEAM Standards.

b) Within six months of first occupation of the non-residential uses hereby permitted, a certified Post Construction Review (or other verification process agreed with the Local Planning Authority) shall be submitted to and approved in writing by the Local Planning Authority, confirming that the agreed 'Excellent' BREEAM standards have been met.

REASON:

To ensure the proposal achieves high environmental standards and plays its role in reducing the extent of man-made climate change, in accordance with: the National Planning Policy Framework 2024; Policy SI2 (Minimising Greenhouse Gas Emissions) of the London Plan 2021; and Policies SP6 (Climate Emergency) and P69 (Sustainability Standards) of the Southwark

Plan 2022.

51.. **TRAVEL PLAN**

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

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

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

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

Signed:

RECOMMENDATION

LBS Registered Number: 24/AP/3819

Informative Notes to Applicant Relating to the Proposed Development

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2. Circular Economy Post-Construction Monitoring report

Once the Post-Construction Monitoring report is approved by the LPA, the Applicant should provide the approved post-construction monitoring report and any supporting information to the GLA at circulareconomystatements@london.gov.uk

3. Network Rail

The Applicant is reminded to engage Network Rail's Asset Protection and Optimisation (ASPRO) team prior to works commencing. This will allow their ASPRO team to review the details of the proposal to ensure that the works can be completed without any risk to the operational railway. The Applicant may be required to enter into an Asset Protection Agreement to get the required resource and expertise on-board to enable approval of detailed works.

To start the process with our Asset Protection team, the applicant / developer should use the Asset Protection Customer Experience (ACE) system found on Network Rail's Asset Protection website (https://www.networkrail.co.uk/running-the-railway/looking-after-the-railway/asset-protection-and-optimisation/).

Where applicable, the applicant must also follow the Network Railway Asset Protection informatives.

4. Rail for London

The Applicant is reminded to enter into an Asset protection Agreement with Rail for London to ensure that the development is carried out safely and in accordance with RfL's 'Infrastructure Protection - Special Conditions for Outside Parties working'.

RECOMMENDATION

LBS Registered Number: 24/AP/3819

5. INFORMATIVE FROM THAMES WATER REGARDING WASTE WATER: WORKING NEAR OR DIVERTING PIPES

Please read the Thames Water guide 'Working Near Our Assets' to ensure any works carried out will be in line with the necessary processes if working above or near Thames Water pipes or other structures. This can be accessed from: https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes

Should you require further information please contact Thames Water on: developer.services@thameswater.co.uk

6. INFORMATIVE FROM THAMES WATER REGARDING POTABLE WATER: MINIMUM PRESSURE AND FLOW RATE

Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development

7. INFORMATIVE RELATING TO BIRD NESTING SEASON

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

RECOMMENDATION

LBS Registered Number: 24/AP/3819

Biodiversity Net Gain Informative

Biodiversity net gain is a way of creating and improving biodiversity by requiring development to have a positive impact ('net gain') on biodiversity.

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.

Under the statutory framework for biodiversity net gain, subject to some exceptions, every grant of planning permission is deemed to have been granted subject to the condition that the biodiversity gain objective is met ("the Biodiversity Gain Condition").

This objective is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat. This increase can be achieved through onsite biodiversity gains, registered offsite biodiversity gains or statutory biodiversity credits.

The biodiversity gain condition is a pre-commencement condition: once planning permission has been granted, a Biodiversity Gain Plan must be submitted to and approved by Southwark Council (the local planning authority) before commencement of the development. There are exemptions, transitional arrangements and requirements relating to irreplaceable habitat which disapply the condition from certain planning permissions, as well as special modifications for planning permissions for phased development and the treatment of irreplaceable habitats. Based on the information available this permission is considered to be one which will require the approval of a biodiversity gain plan before development is begun because none of the statutory exemptions or transitional arrangements are considered to apply.

RECOMMENDATION

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Important Notes Relating to the Council's Decision

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1. **Conditions**

   - If permission has been granted you will see that it may be subject to a number of planning conditions. They are an integral part of our decision on your application and are important because they describe how we require you to carry out the approved work or operate the premises. It is YOUR responsibility to comply fully with them. Please pay particular attention to those conditions which have to be met before work commences, such as obtaining approval for the siting and levels of buildings and the protection of trees on the site. If you do not comply with all the conditions in full this may invalidate the permission.

   - Further information about how to comply with planning conditions can be found at:

https://www.planningportal.co.uk/info/200126/applications/60/consent_types/12

   - Please note that there is a right of appeal against a planning condition. Further information can be found at: https://www.planningportal.co.uk/info/200207/appeals/108/types_of_appeal

2. **Community Infrastructure Levy (CIL) Information**

   - If your development has been identified as being liable for CIL you need to email Form 1: CIL Additional Information, Form 2: Assumption of Liability and Form 6: Commencement Notice to cil.s106@southwark.gov.uk as soon as possible, so that you can be issued with a Liability Notice. This should be done at least a day before commencement of the approved development.

   - **Payment of the CIL charge is mandatory and the CIL Regulations comprises a range of enforcement powers and penalties for failure to following correct procedures to pay, including stop notices, surcharges, late payment interests and prison terms.**

   - To identify whether your development is CIL liable, and further details about CIL including eligibility and procedures for any CIL relief claims, please see the Government's CIL guidance:

https://www.gov.uk/guidance/community-infrastructure-levy

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- All CIL Forms are available to download from Planning Portal:

https://www.planningportal.co.uk/info/200136/policy_and_legislation/70/community_infrastructure_levy/5

- Completed forms and any CIL enquiries should be submitted to cil.s106@southwark.gov.uk

3. National Planning Policy Framework

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

4. Appeals to the Secretary of State

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

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

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

- The Secretary of State can allow a longer period for giving notice of an appeal, but he will not normally be prepared to use this power unless there are special circumstances which excuse the delay in giving notice of appeal.

- The Secretary of State need not consider an appeal if it seems to the Secretary of State that the local planning authority could not have granted planning permission for the proposed development or could not have granted it without the conditions they imposed, having regard to the statutory requirements, to the provisions of any development order and to any directions given under a development order.

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- If you intend to submit an appeal that you would like examined by inquiry then you must notify the Local Planning Authority and Planning Inspectorate (inquiryappeals@planninginspectorate.gov.uk) at least 10 days before submitting the appeal.

- Further details are on GOV.UK (https://www.gov.uk/government/collections/casework-dealt-with-by-inquiries).

5. Purchase Notice

- If either the local planning authority or the Secretary of State grants permission subject to conditions, the owner may claim that the land can neither be put to a reasonably beneficial use in its existing state nor made capable of reasonably beneficial use by the carrying out of any development which has been or would be permitted. In these circumstances the owner may serve a purchase notice on the Council requiring the Council to purchase the owner's interest in the land in accordance with Part VI of the Town and Country Planning Act 1990

6. Provisions for the Benefit of the Disabled

- Applicants are reminded that account needs to be taken of the statutory requirements of the Disability Discrimination Act 1995 to provide access and facilities for disabled people where planning permission is granted for any development which provides:

  i. Buildings or premises to which the public are to be admitted whether on payment or otherwise. [Part III of the Act].

  ii. Premises in which people are employed to work as covered by the Health and Safety etc At Work Act 1974 and the Management of Health and Safety at Work Regulations as amended 1999. [Part II of the Act].

  iii. Premises to be used as a university, university college or college, school or hall of a university, or intended as an institution under the terms of the Further and Higher Education Act 1992. [Part IV of the Act].

- Attention is also drawn to British Standard 8300:2001 Disability Access, Access for disabled people to schools buildings – a management and design guide. Building Bulletin 91 (DfEE 99) and Approved Document M (Access to and use of buildings) of the Building Regulations 2000 or any such prescribed replacement.

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

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

8. **Works Affecting the Public Highway**

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

9. **The Dulwich Estate Scheme of Management**

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

10. **Building Regulations.**

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

11. **The Party Wall Etc. Act 1996.**

- You are advised that you must notify all affected neighbours of work to an existing wall or floor/ceiling shared with another property, a new building on a boundary with neighbouring property or excavation near a neighbouring building. An explanatory booklet aimed mainly at householders and small businesses can be obtained from the Department for Communities and Local

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Government [DCLG] Free Literature tel: 0870 1226 236 [quoting product code 02BR00862].

12. **Important**

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

301-303 Ilderton Road London Southwark (ref 24/AP/3819) ;

APPENDIX 2

Relevant Planning Policy

Reference:	24/AP/3819
Proposal:	Demolition of the existing buildings and construction of a 15-storey building comprising Purpose-Built Student Accommodation (Use Class Sui Generis) and commercial floorspace (Class E(g)), with landscaping, cycle parking and associated ancillary development.
Location:	301-303 Ilderton Road London Southwark SE15 1NW

Adopted planning policy

National Planning Policy Framework (NPPF)

1. The revised National Planning Policy Framework ('NPPF'), updated in 2024, sets out the national planning policy and how this should be applied. The NPPF focuses on sustainable development with three key objectives: economic, social and environmental. At its heart is a presumption in favour of sustainable development.

2. Paragraph 218 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications.

3. The relevant chapters of the NPPF are:

- Chapter 2 - Achieving sustainable development
- Chapter 4 - Decision-making
- Chapter 5 - Delivering a sufficient supply of homes
- Chapter 6 - Building a strong, competitive economy
- Chapter 7 - Ensuring the vitality of town centres
- Chapter 8 - Promoting healthy and safe communities
- Chapter 9 - Promoting sustainable transport
- Chapter 11 - Making effective use of land
- Chapter 12 - Achieving well-designed places
- Chapter 14 - Meeting the challenge of climate change, flooding and coastal change
- Chapter 15 - Conserving and enhancing the natural environment
- Chapter 16 - Conserving and enhancing the historic environment

London Plan 2021

4. On 2 March 2021, the Mayor of London published the London Plan 2021. The spatial development strategy sets a strategic framework for planning in Greater London and forms part of the statutory Development Plan for Greater London.

5. The strategic objectives of the London Plan 2021 are to build strong and inclusive communities, make the best use of land, promote a healthy city, optimise housing delivery including affordable housing, conserve and enhance London's global competitiveness, and move towards a more resilient and sustainable city. Development proposals must comply with the various policies within the Plan and should follows the guidance set out within Supplementary Planning Documents, Guidance and Strategies.

6. The relevant policies of the London Plan 2021 are:

- GG1 - Building strong and inclusive communities
- GG2 - Making the best use of land
- GG3 - Creating a healthy city
- GG4 - Delivering the homes Londoners need
- GG5 - Growing a good economy
- GG6 - Increasing efficiency and resilience
- Policy SD1 - Opportunity Areas
- Policy SD10 - Strategic and local regeneration
- Policy D1 - London's form, character and capacity for growth
- Policy D2 - Infrastructure requirements for sustainable densities
- Policy D3 - Optimising site capacity through design-led approach
- Policy D4 - Delivering good design
- Policy D5 - Inclusive design
- Policy D6 - Housing quality and standards
- Policy D7 - Accessible housing
- Policy D8 - Public realm
- Policy D9 - Tall Buildings
- Policy D10 - Basement development
- Policy D11 - Safety, security and resilience to emergency
- Policy D12 - Fire safety
- Policy D13 - Agent of change
- Policy D14 - Noise
- Policy H1 - Increasing housing supply
- Policy H4 - Delivering affordable housing
- Policy H5 - Threshold approach to applications
- Policy H6 - Affordable housing tenure
- Policy H7 - Monitoring of affordable housing
- Policy H10 - Housing size mix
- Policy H15 - Purpose-built student accommodation
- Policy S1 - Developing London's social infrastructure
- Policy S2 - Health and social care facilities
- Policy S4 - Play and informal recreation
- Policy E1 - Offices
- Policy E2 - Providing suitable business space
- Policy E3 - Affordable workspace
- Policy E4 - Land for industry, logistics and services to support London's economic function
- Policy E6 - Locally Significant Industrial Sites

- Policy E7 - Industrial intensification, co-location and substitution
- Policy E8 - Sector growth opportunities and clusters
- Policy E9 - Retail, markets and hot food takeaways
- Policy E11 - Skills and opportunities for all
- Policy HC1 - Heritage conservation and growth
- Policy HC3 - Strategic and local views
- Policy HC4 - London View Management Framework
- Policy G1 - Green infrastructure
- Policy G4 - Open space
- Policy G5 - Urban greening
- Policy G6 - Biodiversity and access to nature
- Policy G7 - Trees and woodlands
- Policy SI 1 - Improving air quality
- Policy SI 2 - Minimising greenhouse gas emissions
- Policy SI 3 - Energy infrastructure
- Policy SI 4 - Managing heat risk
- Policy SI 5 - Water infrastructure
- Policy SI 6 - Digital connectivity infrastructure
- Policy SI 7 - Reducing waste and supporting the circular economy
- Policy SI 8 - Waste capacity and net waste self-sufficiency
- Policy SI 12 - Flood risk management
- Policy SI 13 - Sustainable drainage
- Policy T1 - Strategic approach to transport
- Policy T2 - Healthy Streets
- Policy T3 - Transport capacity, connectivity and safeguarding
- Policy T4 - Assessing and mitigating transport impacts
- Policy T5 - Cycling
- Policy T6 - Car parking
- Policy T6.1 - Residential parking
- Policy T6.2 - Office parking
- Policy T6.3 - Retail parking
- Policy T6.5 - Non-residential disabled persons parking
- Policy T7 - Deliveries, servicing and construction
- Policy T8 - Aviation
- Policy T9 - Funding transport infrastructure through planning
- Policy DF1 - Delivery of the Plan and planning obligations

Relevant London-level Supplementary Planning Documents/ Guidance and Strategies

7. The relevant London-level supplementary planning documents and guidance documents are as follows:

- Mayor of London: Accessible London - Achieving an Inclusive Environment (SPG, 2004)
- Mayor of London: Affordable Housing and Viability (SPG, 2017)
- Mayor of London: Air Quality Neutral (LPG, 2023)

- Mayor of London: All London Green Grid (SPG, 2011)
- Mayor of London: 'Be Seen' Energy Monitoring Guidance LPG (2022)
- Mayor of London: Circular Economy Statements (LPG, 2022)
- Mayor of London: Climate Change Mitigation and Energy Strategy (2010)
- Mayor of London: Climate Change Adaptation Strategy (2011)
- Mayor of London: Crossrail Funding (SPG, 2016)
- Mayor of London: Environment Strategy (2018)
- Mayor of London: Equality, Diversity and Inclusion Strategy (2022)
- Mayor of London: Housing (SPG, 2016)
- Mayor of London: Housing Strategy (2018)
- Mayor of London: Characterisation and growth strategy (LPG,2023)
- Mayor of London: Optimising site capacity: a design-led approach (LPG,2023)
- Mayor of London: Housing design standards (LPG,2023)
- Mayor of London: Purpose-built Student Accommodation (LPG,2024)
- Mayor of London: London View Management Framework (SPG, 2012)
- Mayor of London: Planning for Equality and Diversity in London (SPG, 2007)
- Mayor of London: Public London Charter (2012)
- Mayor of London: Play and Informal Recreation (SPG, 2012)
- Mayor of London: Shaping Neighbourhoods - Character and Context (SPG, 2014)
- Mayor of London: Social Infrastructure (SPG, 2015)
- Mayor of London: Sustainable transport, walking and cycling (LPG, 2022)
- Mayor of London: The Control of Dust and Emissions During Construction and Demolition (SPG, 2014)
- Mayor of London: Transport Strategy (2018)
- Mayor of London: Whole Life Carbon Assessments (LPG, 2022)
- Mayor of London: Urban greening factor (LPG,2023)

Draft GLA guidance (emerging material considerations)

8. To support the London Plan 2021, the GLA has drafted further London Planning Guidance (LPG) on topic areas including:

- Mayor of London: Affordable Housing (draft)
- Mayor of London: Development Viability (draft)
- Mayor of London: Fire safety (draft)

Southwark Plan

9. The Southwark Plan 2022 includes Strategic Policies, Area Visions and Development Management Policies. The most relevant strategic policies are as follows:

- ST1 - Southwark's development targets
- ST2 - Southwark's places

- SP1 - Homes for all
- SP2 - Southwark together
- SP3 - A great start in life
- SP4 - Green and inclusive economy
- SP5 - Thriving and neighbourhoods and tackling health equalities
- SP6 - Climate emergency
- AV.13 - Old Kent Road Area Vision
- Policy P1 - Social rented and intermediate housing
- Policy P2 - New family homes
- Policy P5 - Student homes
- Policy P8 - Wheelchair accessible and adaptable housing
- Policy P13 - Design of places
- Policy P14 - Design quality
- Policy P15 - Residential design
- Policy P16 - Designing out crime
- Policy P17 - Tall buildings
- Policy P18 - Efficient use of land
- Policy P21 - Conservation of the historic environment and natural heritage
- Policy P23 - Archaeology
- Policy P26 - Local list
- Policy P27 - Education places
- Policy P28 - Access to employment and training
- Policy P30 - Office and business development
- Policy P31 - Affordable workspace
- Policy P39 - Shop fronts
- Policy P43 - Outdoor advertisements and signage
- Policy P44 - Broadband and digital infrastructure
- Policy P45 - Healthy developments
- Policy P49 - Public transport
- Policy P50 - Highway impacts
- Policy P51 - Walking
- Policy P53 - Cycling
- Policy P54 - Car parking
- Policy P55 - Parking standards for disabled people and the physically impaired
- Policy P56 - Protection of amenity
- Policy P57 - Open space
- Policy P59 - Green infrastructure
- Policy P60 - Biodiversity
- Policy P61 - Trees
- Policy P62 - Reducing waste
- Policy P64 - Contaminated land and hazardous substances
- Policy P65 - Improving air quality
- Policy P66 - Reducing noise pollution and enhancing soundscapes
- Policy P67 - Reducing water use
- Policy P68 - Reducing flood risk

- Policy P69 - Sustainability standards
- Policy P70 - Energy
- Policy IP1 - Infrastructure
- Policy IP2 - Transport infrastructure
- Policy IP3 - Community infrastructure levy (CIL) and Section 106 planning obligations
- Policy IP6 - Monitoring development
- Policy IP7 - Statement of community involvement

Relevant Local-level Supplementary Planning Documents

10. The relevant supplementary planning documents and guidance documents from the local development plan are as follows:

- 2015 Technical Update to the Residential Design Standards 2011 (SPD, 2015)
- Affordable Housing (2025)
- Design and Access Statements (SPD, 2007)
- Development Viability (SPD, 2016)
- Section 106 Planning Obligations and Community Infrastructure Levy (2025)
- Sustainability Assessment (SPD, 2009)
- Sustainable Design and Construction (SPD, 2009)
- Sustainable Transport (SPD, 2010)

Relevant draft Area Action Plans

11. The relevant draft Area Action Plan is

- Old Kent Road (draft AAP, 2024 consultation version)

APPENDIX 3

Planning history of the site and nearby sites

Reference:	24/AP/3819
Proposal:	Demolition of the existing buildings and construction of a 15-storey building comprising Purpose-Built Student Accommodation (Use Class Sui Generis) and commercial floorspace (Class E(g)), with landscaping, cycle parking and associated ancillary development.
Location:	301-303 Ilderton Road London Southwark SE15 1NW

Application site	
1.	Reference Number: 24/AP/1252 Application Type: Full planning application Discharge of planning obligation Affordable Housing Providers as required by 20/AP/3560 dated 28/06/2023 for demolition of existing buildings and construction of a 15 storey building comprising 59 residential dwellings (Class C3) and commercial floorspace (Class E(g), with landscaping (including a communal roof garden and ground floor playspace), cycle parking and associated ancillary development Decision: Pending
2.	Reference Number: 20/AP/3560 Application Type: Full planning application Demolition of existing buildings and construction of a 15 storey building comprising 59 residential dwellings (Class C3) and commercial floorspace (Class E(g), with landscaping (including a communal roof garden and ground floor playspace), cycle parking and associated ancillary development Decision: Granted with legal agreement Decision date: 28 June 2023
3.	Reference Number: 20/AP/1489 Application Type: Non-Material Amendment Non material amendment to planning permission 18/AP/2761 dated 28th May 2020 for 'Demolition of existing buildings and construction of a 12 storey building (plus basement) comprising 46 residential dwellings (Class C3) and commercial floorspace (Class B1(c)), creation of a new vehicular access from Hornshay Street with landscaping (including a communal roof garden), cycle parking and

	associated ancillary development'. The amendments consist of the following: - The realignment of windows and fenestration/brick columns to improve the verticality of the proposed building, while maintaining the same residential floor layouts as recommended for approval. - The removal of the basement and the relocation of the cycle storage to the ground floor. - Reconsideration of the ground and first-floor layouts, while maintaining an area of commercial space over the policy requirement of 390 sqm. - The provision of alternative cycle storage to the rear to increase short stay commercial staff cycle provision and some additional residential cycle spaces utilising Sheffield stands Decision: Granted Decision date: 27 August 2020
4.	Reference Number: 18/AP/2761 Application Type: Full planning application Demolition of existing buildings and construction of a 12 storey building (plus basement) comprising 46 residential dwellings (Class C3) and commercial floorspace (Class B1(c)), creation of a new vehicular access from Hornshay Street with landscaping (including a communal roof garden), cycle parking and associated ancillary development Decision: Granted with legal agreement Decision date: 20 Febuary.2020
<u>Other nearby sites</u>	
5.	**Tustin Estate Land** Reference Number: 22/AP/1221 Application Type: Hybrid Planning Permission Minor Material Amendment of Condition 2 (Approved Plans) of planning permission 22/AP/1221 dated 27/10/2022 for hybrid application comprising a full planning application for Phase 1 comprising the demolition of Hillbeck Close, Ullswater House and garages at Manor Grove and the erection of four buildings at 2/3-storeys (D1 and D2), 5/9-storeys (C) and 7/13-storeys (G1) providing 167 homes (Class C3) with associated parking, public realm, open spaces, landscaping and ancillary infrastructure; and the refurbishment of properties at Manor Grove. Outline planning permission (all matters reserved except for access) for phases 2, 3 and 4 comprising the demolition of Bowness House, Pilgrims Way Primary School, Kentmere House and Heversham House and the erection of 12 buildings (A, B, E1, E2, E3, E4, F1, F2, G2, H, J and

Pilgrims Way Primary School) ranging in height from 2 to 21 storeys to provide up to 57,786 sqm of floorspace (GEA), comprising up to 523 affordable and market homes (Class C3), up to 3,452 sqm (GEA) of flexible commercial floorspace (Class E, F1 and sui generis) and up to 2,214 sqm (GEA) of educational floorspace (Class F1) including temporary space for the children's centre, with associated parking, public realm, open spaces (including MUGA), landscaping and ancillary infrastructure. Providing a total of 690 homes (Use Class C3) and 5,666 sqm (GEA) of non-residential floorspace (Use Classes E, F1 and sui generis).

Amendments to the outline planning permission to allow for:
- Changes in maximum building height of Block G2
- Increase in maximum building height of Block H
- Removal of commercial floorspace in Block H
- Change in phasing plan to deliver Tustin Common works from Phase 2 to Phase 3 with new interim landscaping works
- Changes in housing mix in Phases 2 and 4

Decision: Granted with unilateral undertaking
Decision date: 11 August 2024

Reference Number: 24/AP/2446
Application Type: Reserved matter approval

Approval of Reserved Matters (Access, Appearance, Landscaping, Layout and Scale) in relation to Phase 2 pursuant to hybrid planning permission ref. 23/AP/3474 for Minor Material Amendment of Condition 2 (Approved Plans) of planning permission 22/AP/1221 dated 27/10/2022 comprising a full planning application for Phase 1 comprising the demolition of Hillbeck Close, Ullswater House and garages at Manor Grove and the erection of four buildings at 2/3-storeys (D1 and D2), 5/9-storeys (C) and 7/13-storeys (G1) providing 167 homes (Class C3) with associated parking, public realm, open spaces, landscaping and ancillary infrastructure; and the refurbishment of properties at Manor Grove.

Outline planning permission (all matters reserved except for access) for phases 2, 3 and 4 comprising the demolition of Bowness House, Pilgrims Way Primary School, Kentmere House and Heversham House and the erection of 12 buildings (A, B, E1, E2, E3, E4, F1, F2, G2, H, J and Pilgrims Way Primary School) ranging in height from 2 to 21 storeys to provide up to 57,786 sqm of floorspace (GEA), comprising up to 523 affordable and market homes (Class C3), up to 3,452 sqm (GEA) of flexible commercial floorspace (Class E, F1 and sui generis) and up to 2,214 sqm (GEA) of educational floorspace (Class F1) including temporary space for the children's centre, with associated parking, public realm, open spaces (including MUGA), landscaping and ancillary infrastructure. Providing a total of 690 homes (Use Class C3)

	and 5,666 sqm (GEA) of non-residential floorspace (Use Classes E, F1 and sui generis). Decision: Granted Decision date: 16 April 2025
6.	**Ilderton Wharf 1 - 7 Rollins Street London Southwark** Reference Number: 24/AP/3575 Application Type: Full Planning Permission Demolition of the existing buildings on the site and the construction of a linked building with a tower housing purpose built student accommodation (Use Class Sui Generis), a shoulder element housing affordable residential housing (Class C3) both with basement level, and an industrial building including affordable workspace at the southern element of the Site (Classes B2, B8, E(g)(iii), and Sui Generis), alongside the delivery of a flexible Class E unit at ground floor level, and a mixed community cafe and PBSA co-working space (Class E/Sui Generis) at ground floor level on the corner of Ilderton Road and Surrey Canal Road, in addition to the delivery of hard and soft landscaping, pedestrian and vehicle access including the provision of a loading bay on Ilderton Road, cycle parking, blue badge car parking, wider public realm improvements including new public open space, with associated highway works and all other ancillary works associated with the development. Decision: Pending (Resolution to grant subject to s106 agreement and Stage II referral)
7.	**257-283 Ilderton Road London Southwark SE15 1NS** Reference Number: 23/AP/1317 Application Type: Full Planning Permission Demolition of the existing building and mixed use redevelopment of the site comprising Purpose-Built Student Housing including associated amenity and ancillary café and cycle workshop (Use Class Sui Generis), a new self-storage facility (Use Class B8), light Industrial workspace / incubator units (Use Class E(g)(iii)) and other associated infrastructure.. Decision: Refused Decision date: 20 February 2025
8.	**227-255 Ilderton Road London SE15 1NS** Reference Number: 19/AP/1773 Application Type: Full Planning Permission

	Demolition of existing buildings and the erection of a part 2/3, 9 and 28 storey (up to 94.65m AOD) mixed-use development comprising of 3,581 sqm including 2,538 sqm of industrial floorspace (Use Classes B1c/B8) at ground and intermediate levels, 598 sqm of internal loading yard, 445 sqm ancillary plant and equipment; and 253 residential apartments (C3), 35.75% affordable by habitable room, and other associated infrastructure. This application represents a departure from strategic policy 10 'Jobs and Businesses' of the Core Strategy (2011) and Saved Policy 1.2 'Strategic and Local Preferred Industrial Locations' of the Southwark Plan (2007) by virtue of proposing to introduce residential accommodation in a preferred industrial location. Decision: Granted with legal agreement Decision date: 29 January 2021
9.	**313-349 Ilderton Road London SE15 1NS** Reference Number: 20/AP/1329 Application Type: Full Planning Permission Demolition of existing buildings and construction of two buildings, one of part 11 and 13 storeys and one of part 13 and 15 storeys, to provide 1,739sq.m (GIA) of commercial floorspace, 250 student accommodation bed spaces (Sui Generis) and 58 residential units, with associated access and highway works, amenity space, cycle parking spaces, disabled car parking spaces and refuse/ recycling stores. Decision: Granted with legal agreement Decision date: 13 May 2021

APPENDIX 4

Consultation undertaken

Reference:	24/AP/3819
Proposal:	Demolition of the existing buildings and construction of a 15-storey building comprising Purpose-Built Student Accommodation (Use Class Sui Generis) and commercial floorspace (Class E(g)), with landscaping, cycle parking and associated ancillary development.
Location:	301-303 Ilderton Road London Southwark SE15 1NW

Notices

Site Notice:	Date of notice display: 17.03.2025	**Date of notice expiry**: 07.04.2025
Press Notice:	Date of notice publication: 20.03.2023	**Date of notice expiry:** 10.04.2025

Consultation Letters to Neighbours and Local Groups

Recipient Address:	**Date Letter Sent:**
• Flat 49 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 24 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 35 Kentmere House Tustin Estate Manor Grove L	14/03/2025
• Flat 17 Kentmere House Tustin Estate Manor Grove L	14/03/2025
• Flat 98 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 93 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 32 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 23 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 1 Kentmere House Tustin Estate Manor Grove Lo	14/03/2025
• 33 Manor Grove London Southwark SE15 1EQ	14/03/2025
• 13 Manor Grove London Southwark SE15 1EQ	14/03/2025
• Flat 89 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 87 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 83 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 76 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 68 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 43 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 40 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• 2 Barnaby House Manor Grove London Southwark SE15	14/03/2025
• Flat 2 Kentmere House Tustin Estate Manor Grove Lo	14/03/2025
• Flat 77 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 60 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 51 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• 37 Manor Grove London Southwark SE15 1EQ	14/03/2025
• Flat 82 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 78 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 35 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Living Accommodation 224 Ilderton Road London Sout	14/03/2025

• Unit 11 Canterbury Industrial Park 297 Ilderton Ro	14/03/2025
• 224 Ilderton Road London Southwark SE15 1NT	14/03/2025
• Flat 81 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 67 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 62 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 53 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• 7 Barnaby House Manor Grove London Southwark SE15	14/03/2025
• Flat 3 Kentmere House Tustin Estate Manor Grove Lo	14/03/2025
• Unit 7 Canterbury Industrial Park 297 Ilderton Roa	14/03/2025
• 5 Manor Grove London Southwark SE15 1EQ	14/03/2025
• 49 Manor Grove London Southwark SE15 1EH	14/03/2025
• Flat 71 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 66 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 63 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 22 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Unit 8 Canterbury Industrial Park 297 Ilderton Roa	14/03/2025
• Unit 10 Canterbury Industrial Park 297 Ilderton Ro	14/03/2025
• Flat 48 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• 23 Manor Grove London Southwark SE15 1EQ	14/03/2025
• 2 Hornshay Street London Southwark SE15 1HB	14/03/2025
• Unit 12 Canterbury Industrial Park 297 Ilderton Ro	14/03/2025
• Unit 9 Canterbury Industrial Park 297 Ilderton Roa	14/03/2025
• 303 Ilderton Road London Southwark SE15 1NW	14/03/2025
• Arch 57 Ilderton Road London Southwark SE15 1NW	14/03/2025
• Flat 92 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 57 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Unit 4 Canterbury Industrial Park 297 Ilderton Roa	14/03/2025
• 21 Manor Grove London Southwark SE15 1EQ	14/03/2025
• 1 Hornshay Street London Southwark SE15 1HB	14/03/2025
• 8 Barnaby House Manor Grove London Southwark SE15	14/03/2025
• 5 Barnaby House Manor Grove London Southwark SE15	14/03/2025
• 6 Barnaby House Manor Grove London Southwark SE15	14/03/2025
• 9 Barnaby House Manor Grove London Southwark SE15	14/03/2025
• 3 Barnaby House Manor Grove London Southwark SE15	14/03/2025
• Flat 65 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 46 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 86 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 91 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 80 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 19 Kentmere House Tustin Estate Manor Grove L	14/03/2025
• Flat 96 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 55 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• 19 Manor Grove London Southwark SE15 1EQ	14/03/2025
• 7 Manor Grove London Southwark SE15 1EQ	14/03/2025
• 3 Manor Grove London Southwark SE15 1EQ	14/03/2025
• 51 Manor Grove London Southwark SE15 1EH	14/03/2025
• Flat 97 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 90 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 85 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 56 Heversham House Tustin Estate Ilderton Roa	14/03/2025

• Flat 42 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 33 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Unit 5 Canterbury Industrial Park 297 Ilderton Roa	14/03/2025
• Flat 84 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 72 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Unit 13 Canterbury Industrial Park 297 Ilderton Ro	14/03/2025
• 11 Manor Grove London Southwark SE15 1EQ	14/03/2025
• Flat 75 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 70 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 31 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 54 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 52 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 36 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 29 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 64 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 88 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 79 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 58 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 44 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 37 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• 31 Manor Grove London Southwark SE15 1EQ	14/03/2025
• 25 Manor Grove London Southwark SE15 1EQ	14/03/2025
• Flat 25 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• 1 Barnaby House Manor Grove London Southwark SE15	14/03/2025
• 35 Manor Grove London Southwark SE15 1EQ	14/03/2025
• 17 Manor Grove London Southwark SE15 1EQ	14/03/2025
• 15 Manor Grove London Southwark SE15 1EQ	14/03/2025
• 1 Manor Grove London Southwark SE15 1EQ	14/03/2025
• Flat 95 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 45 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 34 Kentmere House Tustin Estate Manor Grove L	14/03/2025
• Flat 61 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 38 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 74 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 69 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 41 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• 27 Manor Grove London Southwark SE15 1EQ	14/03/2025
• Flat 30 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• 9 Manor Grove London Southwark SE15 1EQ	14/03/2025
• 29 Manor Grove London Southwark SE15 1EQ	14/03/2025
• Flat 28 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 26 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 33 Kentmere House Tustin Estate Manor Grove L	14/03/2025
• Flat 39 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 34 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Unit 6 Canterbury Industrial Park 297 Ilderton Roa	14/03/2025
• Flat 27 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• 4 Barnaby House Manor Grove London Southwark SE15	14/03/2025
• Flat 20 Kentmere House Tustin Estate Manor Grove L	14/03/2025
• Flat 18 Kentmere House Tustin Estate Manor Grove L	14/03/2025

• Flat 4 Kentmere House Tustin Estate Manor Grove Lo	14/03/2025
• Flat 94 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 59 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Flat 50 Heversham House Tustin Estate Ilderton Roa	14/03/2025
• Planning Service, London Borough Of Lewisham Laure	14/03/2025
• 1 Hornshay Street London SE15 1HB	14/03/2025
• 2 Hornshay Street London SE15 1HB	14/03/2025
• Flat 26 Leybourne House 19 Lovelinch Close Lond	14/03/2025

Consultation Letters to Internal Consultees

Initial consultation carried out with all internal consultees, on 13.03.2025.

Re-consultation Letters to Internal Consultees

Name of Internal Consultee:	**Date of most recent re-consultation:**	**Reply received?**
• Highways Development and Management	05.08.2025	**YES**
• Transport Policy	17.16.2025	**YES**
• Planning Policy	18.05.2025	**YES**
• Ecologist	09.06.2025	**YES**
• Flood Risk Management and Urban Drainage	16.04.2025	**YES**
• Waste Management	10.06.2025	**YES**
• Urban Forester	18.05.2025	**YES**

Consultation Letters to External Consultees

Initial consultation carried out with all external consultees, on 13.03.2025.

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Re-consultation Letters to External Consultees

Name of External Consultee:	**Date of most recent re-consultation:**	**Reply Received?**
• Great London Authority	07.08.2025	**YES**
• TfL Spatial Planning	01.08.2025	**NO**
• Thames Water	01.08.2025	**YES**

APPENDIX 5

Consultation responses received

Reference:	24/AP/3819
Proposal:	Demolition of the existing buildings and construction of a 15-storey building comprising Purpose-Built Student Accommodation (Use Class Sui Generis) and commercial floorspace (Class E(g)), with landscaping, cycle parking and associated ancillary development.
Location:	301-303 Ilderton Road London Southwark SE15 1NW

Consultation Responses from Neighbours and Local Groups

Contributor Address:	**Date Received:**
• N/A	N/A

APPENDIX 6

Heads of Terms for Section 106 Agreement

Reference:	24/AP/3819
Proposal:	Demolition of the existing buildings and construction of a 15-storey building comprising Purpose-Built Student Accommodation (Use Class Sui Generis) and commercial floorspace (Class E(g)), with landscaping, cycle parking and associated ancillary development.
Location:	301-303 Ilderton Road London Southwark SE15 1NW

	Obligation	Mitigation / Terms
	Design: Retention of architectural team	
	INOPERATION OF EXTANT PLANNING PERMISSION	Covenant requiring the owner to 'give up' the right to develop under the existing planning permission (ref. 20/AP/3560). Applicant's Position: **Agreed.**
1.	**Design: Retention of architectural team**	
	ARCHITECT NOVATION	Reasonable endeavours shall be made to ensure the original design team (i.e. Stitch) continues to be employed as the project architect or design consultant to carry out the RIBA Stage 3 and 4 design work. Unless otherwise approved by the Council. Applicant's Position: **Agreed.**
2.	**Affordable housing : Payment in lieu**	
	AFFORDABLE HOUSING PAYMENT IN LIEU	Applicant is to pay a minimum of **£7,689,500 (subject to BCIS All in Tender Price Index)** in lieu of providing on-site affordable housing, equivalent to the maximum viable amount (as agreed between the applicant and the Council's independent assessor). The total sum is to be paid in three tranches linked to stages of construction, as follows: • 25% payable on or before Implementation (BCIS All in Tender Price Index-linked) • 50% payable on or before Practical Completion (BCIS All in Tender Price Index-linked) • 25% payable prior to first Occupation (BCIS All in Tender Price Index-linked) Applicant's Position: **Agreed.**
	AFFORDABLE HOUSING UNITS: EARLY STAGE REVIEW	Early Stage Review to be required if substantial implementation has not occurred within 30 months of planning permission being granted. In the event that an additional in-lieu affordable housing payment is required following the identification of a profit surplus through the Early Stage Review process, first occupation of the student accommodation shall be prohibited

		unless and until said monies (BCIS All in Tender Price Index-linked) have been paid in full.
		Applicant's Position: **Agreed.**
3.	**Student accommodation: Operation and management**	
	STUDENT MANAGEMENT PLAN	Prior to occupation of the PBSA development, a Final Student Management Plan is to be submitted to and approved by the Council. The Final Student Management Plan shall be based on the principles established by the application-stage Student Management Plan and shall include details of: - the day to day operation of the student housing to ensure noise and disturbance is minimised during the day- and night-time (including codes of behaviour / conduct and other protocols for managing breaches of acceptable behaviour); - the logistics and coordination of the move-in and move-out arrangements to minimise disruption to the public highway (and shall include specified management measures in respect of both the move-in and move-out period, not just the former, including coordination of arrangements with other student residences in the area so as to avoid overload at peak times); - deliveries and servicing management; - security and surveillance measures; - strategies for establishing and managing relationships and lines of communication with local residents and other potentially affected parties; - a strategy specific to the summer lets period (covering all of the above-listed requirements as well as how coach and taxi arrivals would be discouraged and, where they do occur, how they would be managed). The approved Final Student Management Plan (as amended from time to time) shall be complied with throughout the lifetime of the development. The Final Student Management Plan shall be eligible for amendments from time-to-time, subject in each instance to the Local Planning Authority's approval.
		Applicant's Position: **Agreed**
	USE OF PREMISES	The PBSA development is: - not to be used and occupied for anything other than its authorised purpose as accommodation available for letting as student accommodation to students; - to be used at all times as a single planning unit, with no part of it to be rented, sold, sub-let, licensed or otherwise disposed of in any form as a separate planning unit; and - with respect to all parts of the basement and ground floor of the building, prohibited from being used in the future for sleeping accommodation The student accommodation may be let to non-students during the holiday period (which shall be a maximum of 11 weeks in any one year period running from September 1st to August 31st).
		Applicant's Position: **Agreed.**
4.	**Student accommodation: Occupier facilities**	

	WHEELCHAIR PBSA UNITS DELIVERY	Provision of 13 easily adaptable wheelchair PBSA units. Applicant's Position: **Agreed**
	WHEELCHAIR PBSA UNITS MARKETING	Suitable marketing of the PBSA wheelchair units shall be carried out throughout the lifetime of the premises, with the non-wheelchair units to be let to non-disabled prospective tenants wherever possible with no additional fees charged to them (so that, up until the beginning of term, a maximised number of wheelchair units remain available for take up by those who require them). Applicant's Position: **Agreed**
5.	**Local economy: Employment and training**	
	CONSTRUCTION PHASE JOBS/ CONTRIBUTIONS	The development must: - deliver **12 sustained jobs of minimum 26 weeks** to unemployed Southwark residents calculated on the basis of 1 resident per 500 sqm GEA; - deliver **12 short courses** calculated on the basis of 1 course per 500 sqm GEA; and - support **3 construction industry apprentices** during the construction phase calculated on the basis of 1 resident per 2000 sqm GEA. Or make the pro-rata Employment and Training Contribution which, at maximum, would be **£74,400 (**RPI All Items index linked). This breaks down as: - **£66,000** against sustained jobs calculated on the basis of £5500 per shortfall in jobs; - **£2,400** against short courses calculated on the basis of £200 per shortfall in courses; and - **£6,000** against construction industry apprenticeships calculated on the basis of £2000 per shortfall in apprenticeships. Applicant's Position: **Agreed**
	CONSTRUCTION PHASE EMPLOYMENT, SKILLS AND BUSINESS PLAN	The Plan would be expected to detail: - methodology of training, skills, support etc.; - targets for construction skills and employment outputs; - methodology for delivering apprenticeships; and local supply chain activity methodology. Applicant's Position: **Agreed**
	LOCAL PROCUREMENT	The applicant should allow local businesses to tender for the procurement of goods and services generated by the development both during and after construction. Applicant's Position: **Agreed**
	LONDON LIVING WAGE	The developer shall use reasonable endeavours to pay those who work on site (except in relation to volunteers, apprentices and interns) no less than the LLW. Applicant's Position: **Agreed**

6.	**Local economy: Affordable workspace**	
	MINIMUM PROVISION	Not to occupy the development until no less than 23 square metres of affordable workspace has been fully completed in accordance with the Minimum Specification (see below)
		Applicant's Position**: Agreed**
	LIFETIME AND KEY TERMS OF LEASE	In the event that one or more tenants are secured, the affordable workspace shall be provided for a fixed term commencing upon first operation of the affordable workspace unit in question and terminating no sooner than 30 years (without unnecessary interruption) thereafter Lease agreements with all affordable workspace occupiers shall be subject to conditions including the following: Rent level and any inclusions/ exclusions: - No more than **£12 per square foot GIA per annum**; all to be exclusive of any rates but inclusive of service and building management charges Rent Review: Five yearly (no more than in line with RPI) Rent Free Period: - up to a maximum of 12 months from the grant of the lease if requested by the tenant such period to be equivalent to any period required for any fit out of the premises by the tenant and to be reflective of the reasonable costs incurred in such fit out. Break clause: Tenants will be entitled to operate a break clause after 5 years Rights granted: - Tenants will be granted rights of access including emergency escape rights - Rights of access and use of the loading facilities including loading bays and lifts - Rights of access and use of refuse facilities - Right and access and use of bicycle storage Rights to connect to District Heating Network to be separately metered and charged accordingly.
		The clauses referred to above are to be routinely offered to all new tenants throughout the lifetime of the affordable workspace, not just the initial tenant(s).
		Applicant's Position: **Agreed**
	MINIMUM SPECIFICATION OF UNIT(S)	Prior to implementation, the affordable workspace specification scheme is to be provided to the Council's minimum specification. It prescribes the standards of: - Fit-out (floor, ceiling, windows, doors, power, lighting etc.) specification at point of occupancy

	- Telecommunications - Means of escape - Lifts - Delivery/servicing arrangements - Cycle Storage - Regulations (DDA etc.) compliance The affordable workspace is to be completed in accordance with the approved minimum specification prior to first occupation.
	Applicant's Position: **Agreed**
TENANT ELIGIBILITY	Eligible tenants are to be, as per the definition given in the Southwark Plan 2022, from a specific sector that has a social, cultural or economic development purpose. Priority must be given to pre-existing organisations based within the Borough. In the event that the affordable workspace remains unoccupied in a period of not less than 9 months from the completion of the affordable workspace and three months from the end and/or termination of any lease and/or license of the affordable workspace after first occupation, the affordable workspace may be marketed to end users living or whose business is primarily based outside the Borough.
	Applicant's Position: **Agreed**
AFFORDABLE WORKSPACE STRATEGY	Not less than 6 months before the anticipated date of first occupation of any affordable workspace, an Affordable Workspace Strategy shall be submitted to and approved by the Council prior to occupation of the development., setting out: - how the workspace is of a type, and has been designed to a specification, that meets local demand; - a marketing strategy that prioritises small and independent businesses from the local area with an identified need, and how the affordable workspace will continue to be marketed following first Occupation to ensure that the Affordable Workspace remains occupied; - evidence of collaboration with partners and stakeholders to identify businesses nominated for occupation; - how various different occupiers and their needs could be accommodated; - lease/licence terms and details; - the facilities for the occupiers (to include at least kitchen, toilet and printing facilities, charging points and high speed internet); - any business incubation support that will be offered to start-ups; - community outreach programme - other details as the Council may reasonably require.
	Applicant's Position: **Agreed**
MONITORING	On the 1 April each year following first occupation, annual monitoring reports shall be submitted to the Council for approval. They should detail: - the extent to which the objectives set out within the Affordable Workspace Strategy have been achieved; - the level of occupancy of the affordable workspace and a breakdown

		of those in occupation by eligibility, sector and size; - an overview as to the terms of occupation of the affordable workspace including confirmation as to the amount of discount applied to rent; - measures to improve the operation of the affordable workspace; Applicant's Position: **Agreed**
7.	**Local Economy: Use of Premises**	
	USE	To retain the 225.5 sqm employment floorspace as Class E(g)(iii) floorspace through the lifetime of the development unless otherwise agreed in writing by the Council. Applicant's Position: **Agreed**
8. .	**Landscape and public realm: Off-site open space and trees**	
	PUBLIC OPEN SPACE: IN-LIEU PAYMENT	Develop to pay **£109,850** (BCIS index linked) to mitigate the failure to deliver all of the public open space requirement arising from the PBSA housing elements of the proposal calculated on the basis of 325 per shortfall of the public open space. Applicant's Position: **Agreed**
	NEW TREES CONTRIBUTION	the developer is to pay to a sum of £9,000 for planting new trees in the borough (BCIS index linked) Applicant's Position: **Agreed**
9.	**Transport: Construction phase mitigation**	
	CONSTRUCTION MANAGEMENT MONITORING	Prior to implementation, the developer is to contribute **£9,815** (RPI All Items index linked) on the basis of the standard fees per application of £3,200 and £1.05 sqm per total proposed GIA, to cover the cost incurred by the Council's Highways Network Management and Environmental Protection divisions in providing the following services: - monitoring the construction-related activities associated with the development; - monitoring the cumulative impacts of those activities on the surrounding highways and local environment, together with the other construction activities on nearby sites; and - ensuring compliance with the approved CEMP throughout the duration of the build programme. Applicant's Position: **Agreed**
10.	**Transport: Development mitigation**	
	TfL CYCLE HIRE DOCKING STATION CONTRIBUTION	Prior to first occupation, the developer is to contribute **£4,338** (BCIS index linked) towards expansion of one or more TfL cycle docking stations in the vicinity of the site on the basis of 50 per 100sqm for commercial space of E(g)(iii)/B8 uses and £25 per student room Applicant's Position: **Agreed**

TfL PUBLIC TRANSPORT CONTRIBUTION	The developer is to contribute **£152,100** (BCIS index linked from 2019) towards TfL bus service improvements, and any necessary associated transport and public realm improvements, in the vicinity of the site. The sum shall be paid one year prior to occupation of the student accommodation.
	Applicant's Position: **Agreed**
DELIVERY AND SERVICING MONITORING PLAN	Prior to occupation of any part of the development, a Delivery and Servicing Monitoring Plan is to be submitted to and approved by the Council. The Delivery and Servicing Monitoring Plan shall set out the method for monitoring and recording the number of servicing and delivery trips to and from the development.
	Applicant's Position: **Agreed**
DELIVERY AND SERVICING MANAGEMENT BOND	Prior to occupation of any part of the development, a Delivery and Servicing Bond is to be paid to the Council. The bond will be **£8,468**, comprising: - a cash deposit of **£5,678** (RPI All Items index linked), calculated on the basis of £100 per three PBSA bedspaces and £100 per 500sqm non-residential floorspace; - a monitoring fee of **£2,790.00** (RPI All Items index linked) to cover the Council's costs of assessing the quarterly monitoring. For a period of two years from opening of the student accommodation scheme the daily vehicular servicing activity of the site is to be monitored (in accordance with the approved Delivery and Servicing Monitoring Plan) and returns made on a quarterly basis. If the site meets or betters its own baseline target the Delivery and Servicing Management Cash Deposit will be returned to the developer within 6 months of the end of the monitoring period. If the site fails to meet its own baseline the cash deposit will be made available for the Council to utilise for sustainable transport and highways remediation projects in the ward of the development. Irrespective of whether the development meets or fails to meets is baseline target, the Council will retain the monitoring fee.
	Applicant's Position: **Agreed**
DELIVERY AND SERVICING MONITORING Fee	The developer is to pay a sum of **£2,790** (RPI All Items index linked) towards monitoring the terms of Delivery and Service Plan and administering the Delivery and Servicing Bond.
	Applicant's Position: **Agreed**
OFFSITE ELECTRIC CHARGING SPACE	Prior to implementation, the developer is required to make a payment of **£9,000** (BCIS index linked) for a car parking with active electric vehicle charging point near the development to mitigate the shortfall in on-site provision.
	Applicant's Position: **Agreed**
PARKING PERMIT ELIGIBILITY EXCLUSION	All of the PBSA occupants and tenants of the commercial space at the development shall be prohibited from being eligible for CPZ parking permits.
	Applicant's Position: **Agreed**
WASTE	For the lifetime of the development, the owner shall ensure that a contract

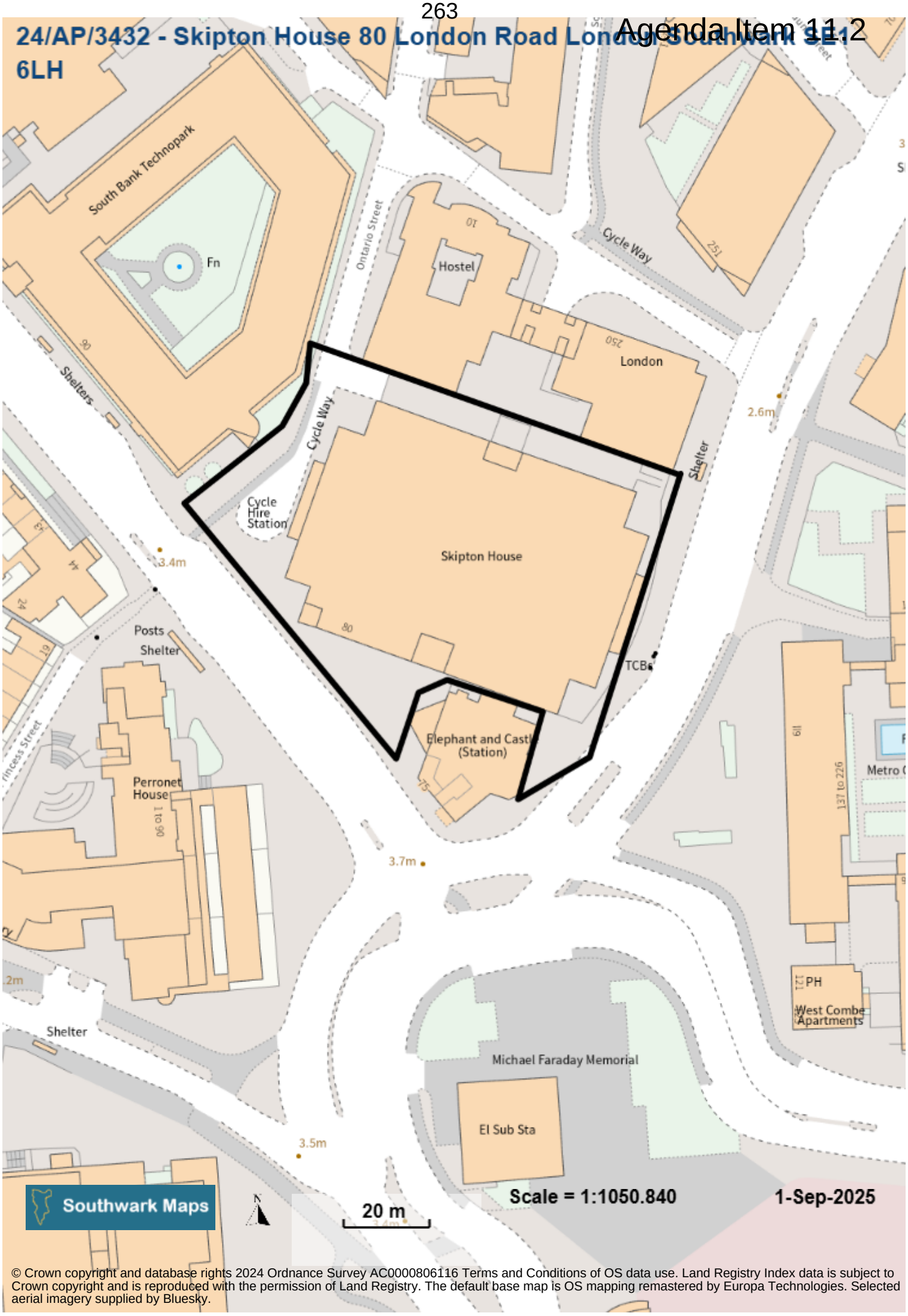
	MANAGEMENT	is in place with a commercial provider of refuse/recycling collection services.
		Applicant's Position: **Agreed**
11.	**Transport: Highway impacts mitigation**	
	SCOPE OF S278 WORKS	Prior to implementation, with the exception of any site clearance/demolition and archaeological investigative works, the developer is to submit the Section 278 Highway Works Specification, detailed design and estimated costs to the LPA (who shall liaise with the Highways Authority) and receive its approval in writing. This Specification, detailed design and estimated costs shall comprise the following parcels of works, and all shall be constructed in accordance with SSDM standards: - Reinstate redundant vehicle crossovers on Ilderton Road as footway (if not reinstated by others). - Creation of new crossover on Hornshay Street, designed in line with LB Southwark standards. - Repave footway including new kerbing fronting the site on Hornshay Street using precast concrete slabs and 150mm wide granite kerbs. - Removal of the existing sinusoidal hump from Hornshay Street and resurfacing the carriageway. - Construct a dropped kerb on Ilderton Road for refuse bin access. - Repair of any damage to the public highway due to construction activity. - Kerbing on Ilderton road to be replaced with 150mm wide granite kerbs. - 'Double blip' restrictions to be refreshed following works.
		Applicant's Position: **Agreed**
	S278 AGREEMENT DEADLINE	Prior to commencement of the agreed highway works, the developer is to enter into a Highway Agreement under Section 278 (and Section 38).
		Applicant's Position: **Agreed**
	S278 DELIVERY	Prior to occupation, the developer is to complete the approved S278 works.
		Applicant's Position: **Agreed**
12.	**Sustainability**	
	FUTURE- PROOFED CONNECTION TO DISTRICT HEAT NETWORK	Prior to occupation, a DHN Energy Strategy must be approved setting out how the development will be designed and built so that it will be capable of connecting to any future DHN. Council to retain right to serve Connection Notice at regular intervals, with applicant to retain right to submit feasibility study in response.
		Applicant's Position: **Agreed**
	CONNECTION TO DISTRICT HEAT	If a Connection Notice is served by the Council on the Developer then the Developer shall within 3 (three) months of receipt of the Connection Notice

NETWORK	submit the Feasibility Study. The Developer shall use all reasonable endeavours to connect the Development to the District Heat Network in accordance with the approved District Heat Network Strategy within a reasonable period following the date of the joint decision by the Council and the Developer (or where applicable the Specialist's decision) that connection is feasible and financially viable.
	Applicant's Position: **Agreed**
CARBON OFFSET PAYMENT 1	The development as built is to achieve the carbon reduction set out in the submitted Application Stage Energy Strategy. Prior to implementation, with the exception of any site clearance/demolition and archaeological investigative works, the developer shall pay an off-site contribution of 50% of the total application stage predicted carbon shortfall (**522** tonnes/CO2). This equates to **261** tonnes/CO2. Calculated applying the Council's current tariff rate of £95/tonne for 30 years, the total is **£49,570** (RPI All Items index linked).
	Applicant's Position: **Agreed**
CARBON OFFSET PAYMENT 2	No later than 4 weeks following occupation of the development, the owner shall submit an Occupation Stage Energy Review to the Council for approval. The Occupation Stage Energy Review shall demonstrate how the development will achieve the Agreed Carbon Targets in accordance with the principles contained in the Application Stage Energy Strategy. In the event that the Occupation Stage Energy Review demonstrates the application stage predicted savings have been met or exceeded, the applicant shall pay the Carbon Green Fund Contribution 2 (thereby fully offsetting the differential between on-site as-built carbon savings and net zero). Only following receipt of the Carbon Green Fund Contribution 2 will the Council issue its approval in writing. In the event that the Occupation Stage Energy Review demonstrates the as-built scheme falls short of the application stage predicted savings, the applicant shall accompany their submission with an Energy Strategy Addendum setting out additional energy efficiency proposals to achieve the Agreed Carbon Targets. If the Council agrees to the proposed additional measures, the owner shall implement all of the measures within twelve months of the Council's approval of the Addendum. If the Council and owner cannot come to an agreement on the proposed additional measures, the owner shall pay a further carbon offset contribution (to be calculated applying the Council's carbon offset tariff in place at that time) within 28 days of the Council issuing their request. The Occupation Stage Energy Review shall be complied with in completing and occupying the development.
	Applicant's Position: **Agreed**
BE SEEN MONITORING	Prior to implementation of the development (with the exception of demolition), the owner shall submit to the GLA and the Council accurate and verified estimates of the 'Be Seen' energy performance indicators. Prior to occupation of the development the owner shall provide to the GLA and the Council updated accurate and verified estimates of the 'Be Seen'

		energy performance indicators. On the first anniversary of occupation or following the end of the Defects Liability Period (whichever is the later) and at least for the following four years after that date, the Owner shall submit to the GLA accurate and verified annual in-use energy performance data for all relevant indicators. In the event that the 'in-use stage' evidence shows that the 'as-built stage' performance estimates have not been or are not being met, the owner shall identify the causes of underperformance and the potential mitigation measures. The owner shall submit to the GLA and the Council a Be Seen Mitigation Measures Plan comprising of measures that are reasonably practicable to implement, along with a proposed timescale for implementation. The measures shall be implemented in accordance with the approved Be Seen Mitigation Measures Plan.
		Applicant's Position: **Agreed.**
	RUNOFF RATE STRATEGY	Prior to occupation of the development, the measures set out in the Run-off Rate Strategy (as detailed in the Flood Risk Assessment and Indicative Surface Water Drainage Strategy prepared by RKS, dated 02/08/2018 and the 681708-R1(1) - LLFA Response prepared by RSK dated 15th April 2025 and the details approved pursuant to condition [X] of the Planning Permission have been delivered.
		Applicant's Position: **Agreed**
	GREENFIELD RUNOFF RATE CONTRIBUTION	Within 28 days of first Occupation of the Building, the developer is to commission an independent assessment of the effectiveness of the Run-off Rate Strategy. In the event of a shortfall between the actual run-off rate and the agreed run-off rate of **2 l/s**, the developer shall pay the Greenfield Runoff Rate Contribution calculated at a rate of £366 per cubic metre of shortfall in surface water attenuation storage required (BCIS index linked).
		Applicant's Position: **Agreed.**
13.	**Archaeology**	
	ARCHAEOLOGY: MONITORING CONTRIBUTION	A sum of **£6,778** (RPI All Items index linked) by the developer on signing of the Section 106 Agreement towards monitoring and providing technical archaeological support during the works on and in the vicinity of the site.
		Applicant's Position: **Agreed.**
14.	**Administration**	
	ADMINISTRATION, COMPLIANCE AND SUBMISSION FEES	Payment of £15,000 to cover the costs of monitoring the Southwark Plan2 housing, employment, business and climate emergency policies. In addition, technical and non-technical submission fees for Section 106 planning obligations shall be paid. The fees are based on charges which reflect the officer time spent on assessing obligations with varying levels of

	complexity, where discharge is required. the amount will be confirmed once the Heads of Terms have been agreed and will be reflected in the Section 106 draft.	
	Technical obligation fee	£561.50 to make a planning decision or approval of a matter within a section 106 agreement which needs a planning decision or approval.
	Non-technical obligation or notification fee	£116 to record notifications where no decision is needed, but where a fact needs to be noted and recorded. These will usually be milestones in the development, such as confirmation of implementation or that a specific action has occurred.
	Non-compliance fee	Additional charge of £300 if a S106 clause has not been discharged and the S106 team have to notify the developer. This is in addition to the cost for discharging a planning obligation. Any follow up correspondence and enforcement action will be charged at £120 per hour plus disbursements and costs.
	Applicant's Position: **Agreed.**	

24/AP/3432 - Skipton House 80 London Road London Southwark SE1 6LH



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Meeting Name:	Planning Committee (Major Applications) B
Date:	10 September 2025
Report title:	**Development Management planning application:** Application 24/AP/3432 for: Full Planning Application **Address:** Skipton House, 80 London Road, London, Southwark SE1 6LH **Proposal:** Demolition of the existing building on site with the retention and reuse of the basement level with minor basement extension. Construction of two separate but linked buildings, expressed as a series of four towers provisioning Residential units (Class C3) in the southern elements, and Purpose Built Student Accommodation units (Use Class Sui Generis), with the delivery of an amount of retail (Class E(a)), food and beverage (Class E (b)), office (Class Eg(i)) and medical services (Class Ee) floorspace at ground, first and second floor levels, with hard and soft landscaping, pedestrian and vehicle access, cycle parking, wider public realm improvements with associated highway works and all other and ancillary works associated with the development. For information: The development as a whole comprises 243 dwellings (Class C3) and 1,434 Purpose Built Student Accommodation Units, 924sqm of Class E(a)-(b) at ground floor level, and 1,106sqm of Class E(gi) and (e) at first and second floor level.
Ward(s) or groups affected:	St Georges
Classification:	Open
Reason for lateness (if applicable):	Not Applicable
From:	Director of Planning and Growth
Application Start Date: 11/12/2024	**Application Expiry Date**: 24/07/2025
Earliest Decision Date: 12/03/2025	

RECOMMENDATIONS

1. That planning permission be granted subject to conditions, the applicant entering into an appropriate legal agreement, and referral to the Mayor of London; and that the director of planning and growth be authorised to add and make amendments to conditions.

2. That the environmental information be taken into account as required by Regulation 26(1) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended); and

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

4. That following the issue of planning permission, the director of planning and growth write to the Secretary of State notifying them of the decision, pursuant to Regulation 30(1)(a) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017; and

5. That following issue of planning permission, the director of planning and growth place a statement on the Statutory Register pursuant to Regulation 28(1) of the TCP (EIA) Regulations 2017, which contains the information required by Regulation 28 and, for the purposes of Regulation 28(1)(h) being the main reasons and considerations on which the planning committee's decision was based shall be set out in the report; and

6. That in the event that the requirements of (1) are not met by 31 December 2025, the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reasons set out in Paragraph 427 of this report.

EXECUTIVE SUMMARY

7. The Site is brownfield land comprising an existing 7-storey, steel-framed office building with basement. The majority of the Application Site is hard landscaping with vehicle access from Ontario Street at the rear.

8. Planning permission is sought for demolition and site clearance of the existing building, retention of the existing basement with a minor basement extension, and the construction of four linked buildings stepping up in height from 21 to 31 storeys. The two affordable residential elements to the south will facilitate the delivery of 243 high-quality affordable housing (Class C3) homes which would be 40.03% by habitable room, comprising 28.4% social rent and 11.6% intermediate, with the two PBSA blocks to the north delivering 1,434 Purpose Built Student Accommodation (Class Sui Generis). 944.2 sqm of flexible retail, food and beverage floorspace are proposed at ground floor while 1,106sqm of office and medical services floorspace are proposed first and second floor levels as well as new areas of public open space and private amenity, alongside the delivery of wider public realm improvements, pedestrian and vehicle access.

9. The Applicant has undertaken pre-application engagement with planning officers in order to facilitate a high-quality scheme comprising purpose-built student accommodation ('PBSL'), affordable family homes (40% by habitable room) and the provision of active retail and food and beverage floorspace to each street frontage. Furthermore, in line with the NPPF, the Application Scheme has undergone community consultation with local residents and the wider public, suitably guiding the development.

SUMMARY TABLES

Homes	Private Homes	Private HR	Social Rent Homes	Social Rent HR	Shared Ownership Homes	Shared Ownership HR	Homes Total (% of total)
Studio	0	0	0	0	0	0	0
1 bed (2P)	0	0	55	165	22	66	32%
2 bed (3P)	0	0	6	24	7	28	5%
2 bed (4P)	0	0	64	256	31	124	39%
3 bed (5P)	0	0	46	234	12	60	24%
Total and (%) of total	**0**	**0**	**171**	**679**	**72**	**278**	**100%**

1B1P (studio)	1B1P (twodio)	Wheelchair Accessible M4(3)	Total
1236	118	80	1434

Use Class Description	Existing GIA	Proposed GIA	Change +/-
Medical Services (Class E)	0	1,106.6 sqm (Flexible Medical Services and Office)	+1,106.6 sqm
Food and Beverage (Class E)	0	944.2 sqm (Flexible Food and Beverage and Retail floorspace)	+1011.1 sqm
Retail/Café Use (Class E)	0	944.2 sqm (Flexible Food and Beverage and Retail floorspace)	+1011.1 sqm
Commercial (Class E)	32,297 sqm	1,106.6 sqm (Flexible Medical Services and Office)	-31,190.4 sqm

Student Accommodation (PBSA)	0	55,332.7 sqm	+ 55,332.7 sqm
Residential Accommodation (Class C3)	0	26,145.8 sqm	+ 26,145.8 sqm

Tenure	Number of Units	Number of Habitable Rooms	% (Habitable Room)
Social Rent	171	679	28.4%
Intermediate	72	278	11.6%
Direct Let (Student)	1434	1434	60%

	Existing Area	Proposed Area	Change +/-
Public Open Space	1,142 sqm	2,451 sqm	+ 1,309 sqm
Play Space	0	1,103 sqm	+ 1,103 sqm

Criterion	Details
CO2 savings	53% CO2 / year
Trees Lost	5
Trees Gained	48 proposed new trees (43 net gain)

Criterion	Existing	Proposed	Change +/-
Urban Greening Factor	0	0.34	+0.34
Greenfield Run Off Rate	N/A	0.88 l/s (1 in 1 year) 0.75 l/s (1 in 30 year) 2.82 l/s (1 in 100 year) 3.3 l/s (1 in 200 years)	
Green Roof Coverage	0	1225 sqm	+ 1,125 sqm
Electric Vehicle Charging Points	0	0	
Cycle Parking (exc cycle hire)	0	PBSA: 1076 Long Stay 36 Short Stay C3: 710 Long Stay 25 Short Stay	+1,847

Criterion	
CIL (estimated)	£ 13,415,873.06 (pre-relief). £ 7,578,466.93 (net of relief)
MCIL (estimated)	£ 2,502,143.38
S106 Contribution	£ 2,930,009.37

BACKGROUND INFORMATION

Site location and description

10. The application site has an area of 0.5 hectares and is located immediately north of the Elephant and Castle gyratory and adjacent to the London Underground Bakerloo tube station. The site is bounded by London Road to the south east, Ontario Street to the west and Newington Causeway to the east. To the rear of the site, along the northern boundary is Perry Library of South Bank University and Keyworth Hostel.

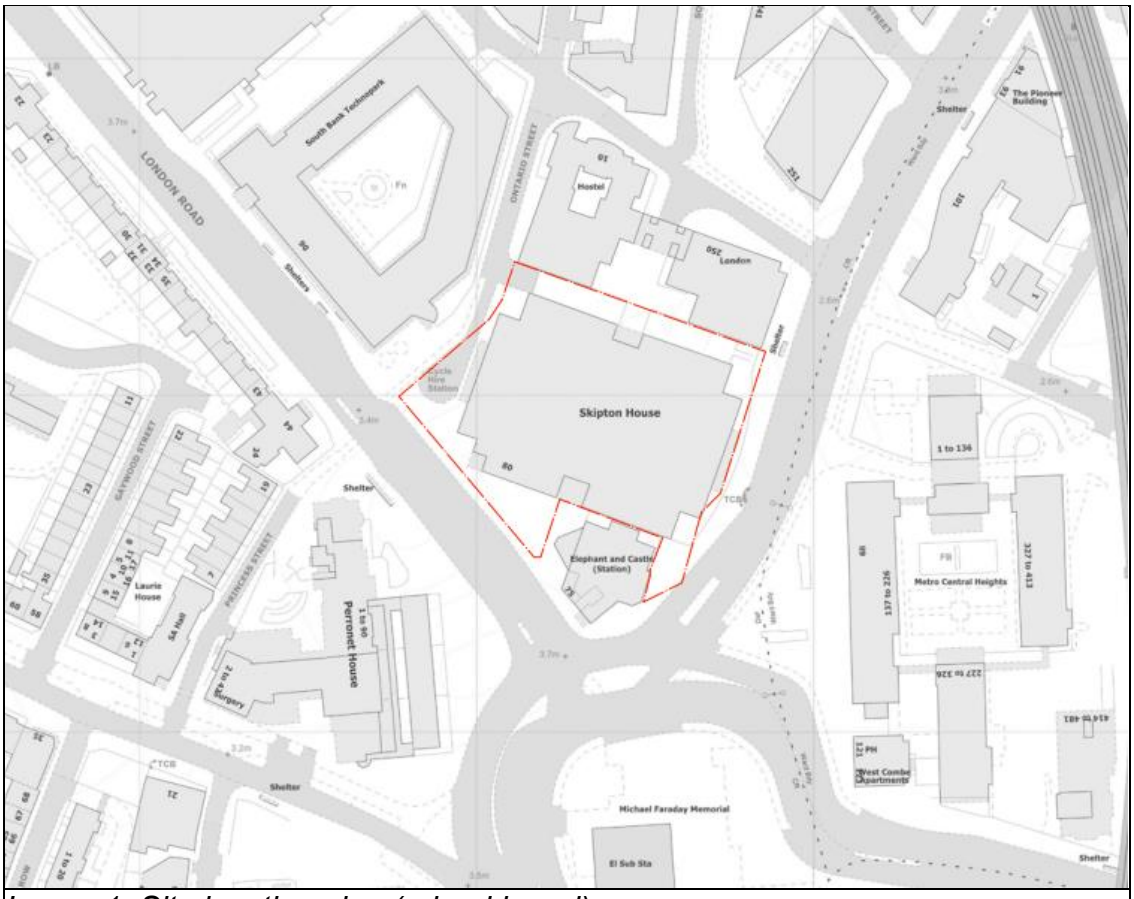


Image 1: Site location plan (edged in red)

11. The Application Site contains an existing 7 storey, steel-framed office building with basement and central atrium. The main entrance to the building faces London Road while service vehicle access is located from Ontario Street at the rear, between the Site and Perry Library. The site does not contain any landscaping or public realm. The existing office building has been vacant since 2022 and remained unlet since this time.

12. The following policy designations are relevant to this site:

    1. Central Activities Zone (CAZ)
    2. Elephant and Castle Opportunity Area
    3. Elephant and Castle Major Town Centre

4. Elephant and Castle Strategic Cultural Quarter
5. Elephant and Castle Area Vision Area
6. London View Management Framework (Serpentine to Palace of Westminster)
7. North Southwark and Roman Roads Archaeological Priority Area
8. Air Quality Management Area
9. Flood Zones 3a.
10. The Tall Buildings Area.
11. PTAL rating of 6b, indicating an excellent level of public transport accessibility.

Surrounding area

13. The immediate area could be categorised as predominantly commercial with shopping and town centre uses around Elephant and Castle Square and Walworth Road. The scale and massing within the area is mixed with several taller buildings present in the townscape along Newington Causeway, Walworth Road, St Georges Road and New Kent Road as highlighted in the image below.

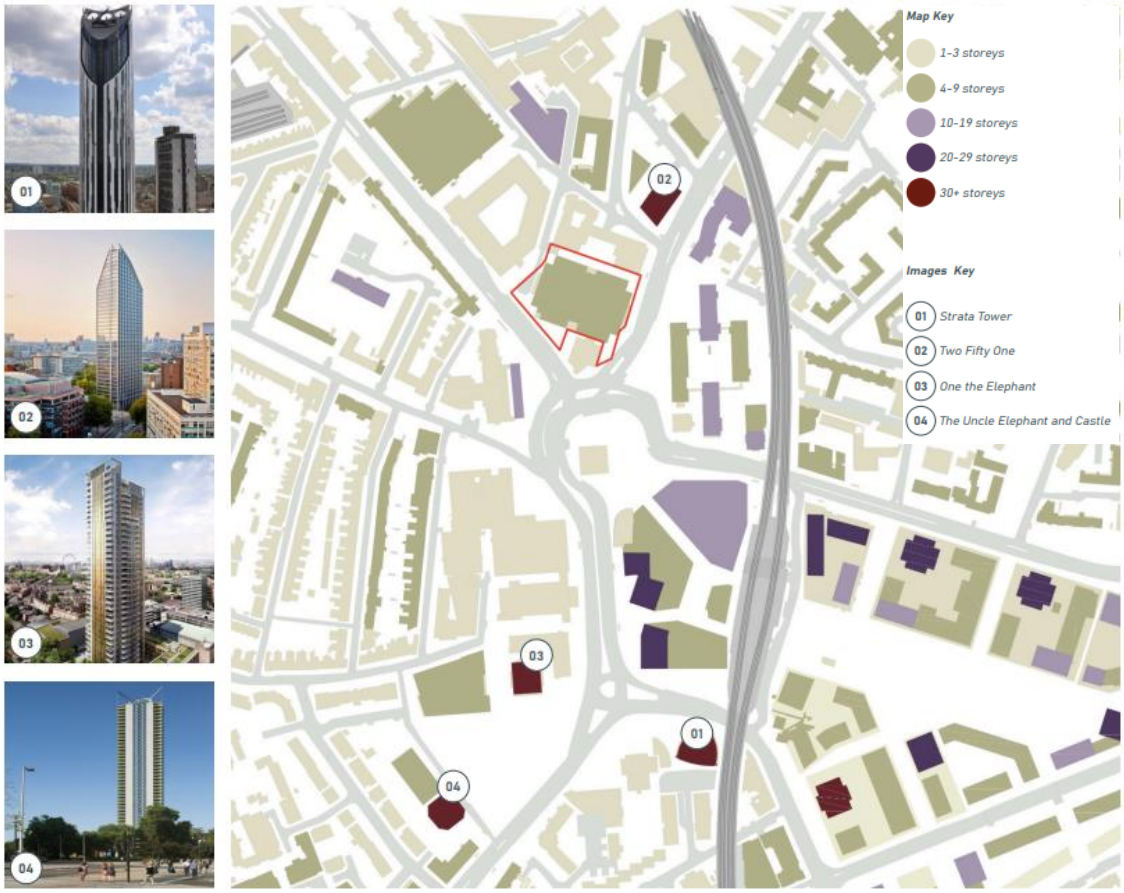


Image 2: Surrounding Building Heights Map

14. Directly to the north of the site are educational buildings, ranging from 3 to 10 storeys, associated with London South Bank University (LSBU) campus located on Keyworth Street and London Road. Also to the north is Eileen House which is a recently redeveloped 41 storey residential complex. Further north on Gaunt Street and Newington Causeway are the Ministry of Sound nightclub and railway lines running to Blackfriars.

15. To the east of the Site, across Newington Causeway is Metro Central Heights, a series of three residential buildings ranging from 7 storeys and 18 storeys in height with commercial uses at ground floor. Lastly to the south of the Site, across London Road, is Perronet House, an eleven storey residential building with commercial uses at the ground floor.

16. The Application Site is situated in a sustainable and highly accessible location. The London Underground (Northern and Bakerloo lines) are both accessible via the adjacent Bakerloo Line Underground Station, while Elephant and Castle National Rail station is located 250m south the of the Site. In addition, given the central location within Elephant and Castle, the site also benefits from extensive bus services operating nearby on Newington Causeway and London Road which are both part of the TfL network. The CS7 cycle superhighway is also located to the west of the site and runs along Ontario Street, linking South and Central London. In light of this, the Site has a Public Transport Accessibility Level (PTAL) rating of 6b indicating the highest level of connectivity.

17. The site is not located within a conservation area but the following Grade II listed buildings are in close proximity to the site:

    1. Metro Central Heights (east on Newington Causeway),
    2. Michael Faraday Memorial in Elephant Square to the south,
    3. Metropolitan Tabernacle on Newington Butts further south

    It is also noted that the Elephant and Castle Bakerloo Line station which is locally listed, while other nearby listed buildings include Inner Crown Court on Newington Causeway to the northeast. The closest heritage conservation area is Elliot’s Row Conservation Area which is located across London Road to the southwest.

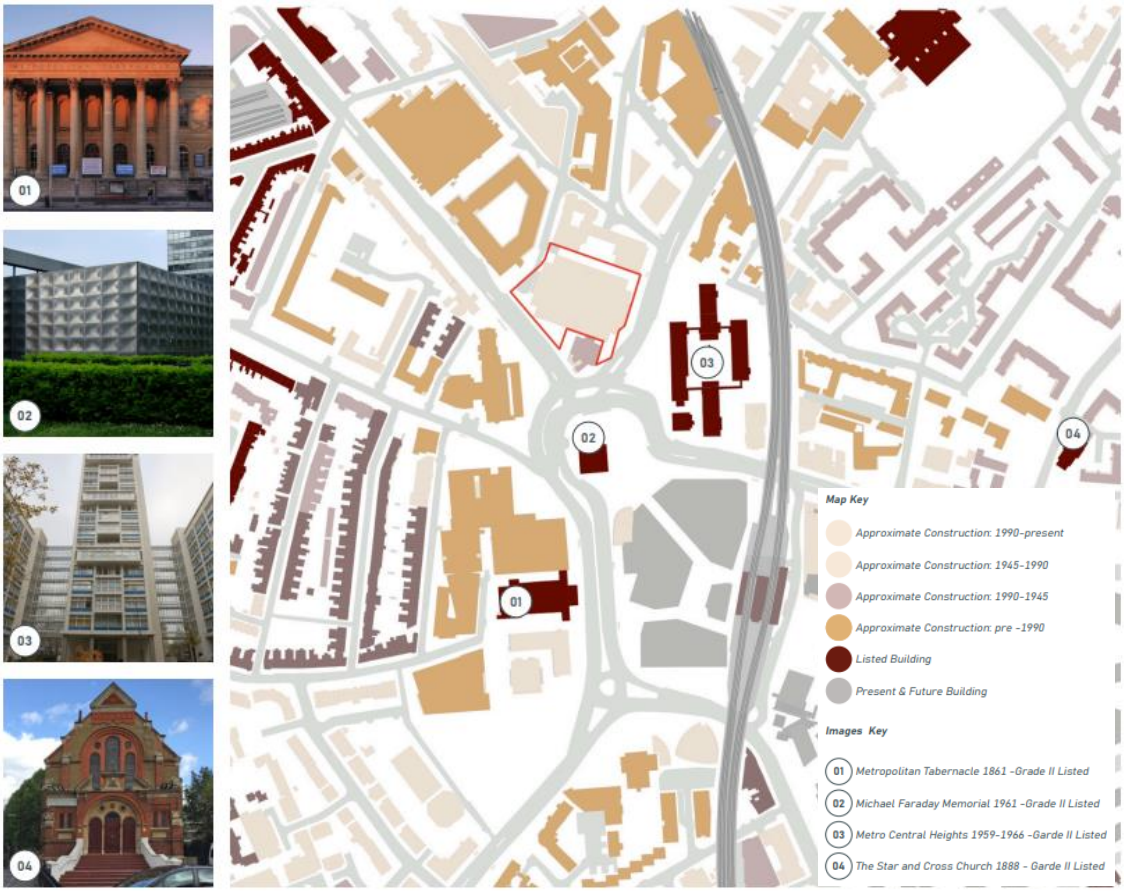


Image 3: Heritage Asset Map

Details of proposal

18. The Proposed Development comprises the demolition and site clearance of the existing building, retention and reuse of the existing basement with a small basement extension, and the construction of two separate but linked buildings, expressed as four buildings stepping up in height from 21 to 31 storeys. The two proposed buildings to the south include affordable blocks which would facilitate the delivery of 243 affordable (Class C3) homes, whilst the two buildings to the north are proposed to deliver 1,434 Purpose Built Student Accommodation (Class Sui Generis). Retail, commercial, office and medical services floorspace are proposed at the ground, first and second floors as well as new areas of public open space and private amenity, alongside the delivery of wider public realm improvements, pedestrian and vehicle access, cycle parking, wider public realm improvements with associated highway works.

Land Use

19. The purposed built student accommodation would be delivered in two towers located to the north of the Site, which are connected at ground to sixth floor level. Block 1A, located in the north-west corner of the Site, will comprise 31 storeys plus basement and contain 648 purpose-built student accommodation units (Sui Generis) with a proportion of shared amenity space located on alternating levels. Block 2A, located in the north-east corner of the Site, will also comprise 31 storeys and contain 724 purpose-built student accommodation

units (Sui Generis) with a similar configuration of shared student amenity space located on alternating levels.

20. The affordable residential homes would be delivered in two towers located on the southern side of Site, fronting London Street and Newington Causeway. Block 1B, located to the south-west of the Site, would comprise 24 storeys and contain 128 affordable homes ranging from 1 to 3 bedrooms. Block 2B, located to the south-west of the Site would comprise 22 storeys and contain 115 affordable homes with a similar housing mix.

21. The ground floor comprises 944.2sqm of retail and food and beverage floorspace (Class E(a) and E(b)) centred around the new public square – Skipton Circus. At first and second floor, 1,106.60sqm of flexible office and medical services (Class E(g)(i) and E(e)) are proposed alongside back of house facilities.

22. Landscaping and public realm works are proposed which include the creation of Skipton Circus, play space, podium gardens and extensive tree planting. Whilst plant and refuse facilities are provided at basement level alongside cycle storage for C3 residents, with cycle parking provision for students provided at first floor level.



Image 4: Plan showing proposed land uses

Student Accommodation

23. The proposal includes 1,434 purpose building student rooms located to the north of the site, contained in two towers. The building contains retail and/or food and beverage uses at the ground floor. The PBSA units will be direct let at market rents.

Affordable Homes

24. The proposal includes the provision of 243 affordable residential homes (Class C3) and accounts for 40.03% of the total habitable rooms on site as affordable housing. The provision of affordable housing is proposed to be split 28.4% social rent homes and 11.6% intermediate by habitable room.

Tenure	Number of Units	Number of Habitable Rooms	% (Habitable Room)
Social Rent	171	679	28.4%
Intermediate	72	278	11.6%
Student (Direct Let)	1,434	1,434	60%
Total	1,677	2,391	100%

Table 1: Tenure split of affordable residential homes and student rooms

25. The residential building comprises 77 one bed apartments, 108 two bed apartments and 58 three bed apartments.

Employment Provision

26. The proposal includes the delivery of 2,050.80 sqm of retail, food and beverage, medical services and office floorspace located at ground, first and second floor levels.

Amendments to the application

27. During the course of the applications, amended / updated plans were received (30 June 2024).

28. The changes included adjustments to the façade articulation, parapet and roofline treatment, materials and finishes, presentation of balconies and base and plinth design of the Residential Building. While for the PBSA Building, the changes included refinement of the base treatment and façade composition. In addition, changes were also proposed to the planting and vehicle tracking along Ontario Street and relocation of cycle stands to Newington Causeway. This was primarily to address matters raised by Officers as a result of internal and statutory consultation to improve the design and presentation of the buildings and improve vehicle tracking and cycle and pedestrian safety.

29. Updated plans and documents were provided by the Applicant which included revised architectural drawings, updated view analysis, an updated air quality statement, a design and access statement addendum, and updated landscaping and plans.

Planning history of the site, and adjoining or nearby sites

30. Any decisions which are significant to the consideration of the current application are referred to within the relevant sections of the report. A fuller history of decisions relating to this site, and other nearby sites, is provided in Appendix 2.

Previous Planning Permissions (subject site)

31. 15/AP/5125 - The Site included the Perry Library building and the Keyworth Street Hostel buildings adjacent to the north of the Site. The application sought the demolition of the existing buildings and creation of 2 levels of basement and the erection of buildings ranging from Ground Floor plus 7 to ground floor plus 39 storeys. The development comprised retail uses (Use Classes A1/A3/A4) at ground floor, multifunctional cultural space (Use Classes D1/D2/Sui Generis) and flexible retail/fitness space (Uses Classes A1/A3/A4 and D2) below ground, and office use (Use Class B1) and 421 residential units (Use Class C3) on upper levels, new landscaping and public realm, a roof garden, ancillary servicing and plant, cycle parking and associated works. The development consisted of two blocks along Ontario Street and a further block along Newington Causeway with the introduction of a new pedestrian street running parallel to Ontario Street and Newington Causeway between the two blocks – Withdrawn but resolution to grant obtained 12/07/2016.



Image 5: Approved SOM Scheme (redevelopment of the full block) (15/AP/5125)

32. 18/AP/4194 - Part retention, part demolition, reconfiguration and re-cladding of existing building and extension to create six additional storeys to accommodate office space (Use Class B1) at upper floor levels, a gym (Use Class D2) and flexible retail/commercial uses (Use Class A1/A2/A3) at ground floor level with associated cycle parking, landscaping, ancillary servicing and plant and all associated works. The permission has yet to be implemented – Granted 17/02/2022.



Image 6: Approved Piercy Scheme (retained office use) (18/AP/4194)

33. 23/AP/0410 - Change of use from office to a flexible use at floors 1 to six (inclusive) to enable office (Class E) and/or education uses (Class F) and flexible mixed uses at the ground and basement to enable retail/cafe/restaurant (Class E) and/or gym (Class E) and/or storage (Class B8) and/or offices (Class E) and/or education uses (Class F), in addition to plant, cycle parking and shower facilities, refuse/recycling storage, car parking and loading bays at basement; external alterations to the building facade including new entrance and roof terrace; landscaping and visitor cycle parking to public realm and all associated works – Granted 28/08/2023.

Pre-Application

34. The following pre-application meetings have been held with respect to the proposed development on the site and Southwark Council:

    1. Meeting 1: Introductory pre-application – 7th November 2023
    2. Meeting 2: Planning & Design – 15th November 2023
    3. Meeting 3: Transport – 28th November 2023
    4. Meeting 4: Planning & Design – 7th December 2023
    5. Meeting 5: Amenity – 12th December 2023
    6. Meeting 6: Design – 10th January 2024
    7. Meeting 7: Energy and Sustainability – 17th January 2024
    8. Meeting 8: Townscape and Landscaping – 23rd January 2024
    9. Meeting 9: Planning & Design – 6th March 2024
    10. Meeting 10: Design – 27th March 2024
    11. Meeting 11: Amenity, Energy/Sustainability and Landscaping – 25th April 2024
    12. Meeting 12: Design – 9th May 2024
    13. Meeting 13: Planning & Design – 22nd May 2024
    14. Meeting 14: Transport – 12th June 2024
    15. Meeting 15: Design and Transport – 18th June 2024
    16. Meeting 16: Design/LVMF Views – 24th July 2024
    17. Meeting 17: Pre submission – 16th October 2024

35. During the course of the pre-application discussions, the scheme was also taken to the Southwark's Design Review Panel in February 2024 and pre-engagement consultation undertaken with the GLA in February 2024 and July 2024, Transport for London (TfL) in February, July and October 2024 and, Historic England in April and July 2024. As a result, the principles of the development were refined to include an uplift of 40% affordable housing, reinstatement of Skipton Street, improved public realm, podium approach to maximise active frontage and creation of Skipton Circus.

36. Different forms of height, massing and design were also explored through various iterations of the design evolution which are noted in Images below. The scheme was refined to include 4 defined buildings with distinct forms reflecting the student and affordable housing tenures and chamfered corners to reflect the adjacent station building. Further articulation was introduced to incorporate a tiered massing to provide a distinct skyline while respecting important view lines. The buildings themselves were also reorientated to align with Ontario Street to improve servicing and access while also providing a centralised public realm for improved green space and the enlargement of the Skipton Circus and active frontage opportunities.

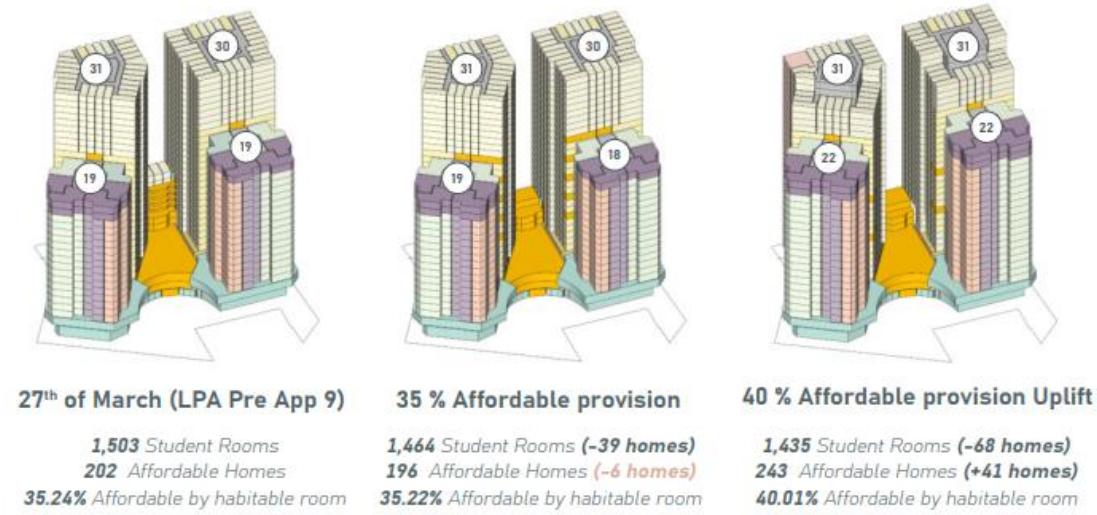


Image 7: Design evolution of the scheme during pre-application

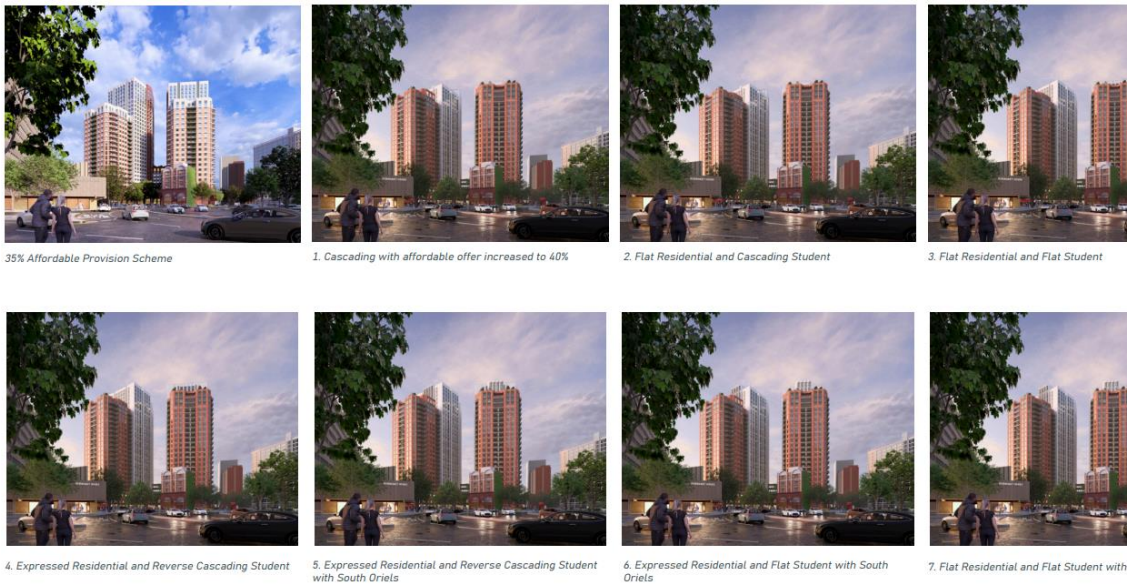


Image 8: Design evolution of the scheme during pre-application showing massing approach

Summary of main issues

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

1. Environmental impact assessment
2. Principle of the proposed development in terms of land use
3. Affordable housing and development viability
4. Housing mix and quality of accommodation
5. Impact of proposed development on amenity of adjoining occupiers and surrounding area, including daylight and sunlight, overshadowing, solar glare and privacy
6. Noise and vibration
7. Public realm and children's play space
8. Heritage considerations
9. Urban Design, including building heights, architectural detailing, layout and access

10. Landscape and trees
11. Green Infrastructure, Ecology and biodiversity
12. Fire Safety
13. Secured by Design
14. Archaeology
15. Transport and highways, including servicing, car parking and cycle parking
16. Environmental matters, including construction management, waste, flooding, contamination, air quality and wind and microclimate
17. Energy and sustainability, including carbon emission reduction
18. Digital connectivity infrastructure
19. Planning obligations (S.106 undertaking or agreement)
20. Mayoral and borough community infrastructure levy (CIL)
21. Community engagement and consultation responses
22. Community impact, equalities assessment and human rights

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

Legal context

38. 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.

39. 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

40. The following policy designations are relevant to this site:

1. Central Activities Zone (CAZ)
2. Elephant and Castle Opportunity Area
3. Elephant and Castle Major Town Centre
4. Elephant and Castle Strategic Cultural Quarter
5. Elephant and Castle Area Vision Area
6. London View Management Framework (Serpentine to Palace of Westminster)
7. North Southwark and Roman Roads Archaeological Priority Area
8. Air Quality Management Area
9. Flood Zones 3a.
10. The Tall Buildings Area.

11. PTAL rating of 6b, indicating an excellent level of public transport accessibility.

ASSESSMENT

Environmental Impact Assessment

41. Environmental Impact Assessment is a statutory procedure that provides for a process assesses and reports upon the beneficial and adverse (positive and negative) environmental effects of development projects. The proposed development falls within Schedule 2, Category 10(b) 'Urban Development Project' of the EIA Regulations 2017 and constitutes EIA development having regard to providing more than 150 dwellings and its potential for likely significant environmental effects given the size and scale of the Proposed Development.

42. Regulation 3 of the EIA Regulations precludes the granting of planning permission unless the Council has undertaken an Environmental Impact Assessment, taking account of the environmental information, which includes the ES, any further information, any representations made by consultation bodies, and any other person, about the environmental effects of the development.

43. In accordance with the EIA Regulations, an Environmental Statement (ES) comprising a Non-Technical Summary, Environmental Statement and Technical Appendices accompanies the application. Following revisions to the overall scheme, an EIA addendum was provided with additional information assessing the environmental impacts of the proposal and any changes that were proposed. That information has been taken into account. Officers are satisfied that the ES is up to date and that the effects described in the ES properly identify the likely significant effects of the proposed development on the environment.

Alternatives:

44. The EIA Regulations require the ES to provide information on the alternative options considered by the applicant and this includes a 'Do Nothing' scenario. It is stated by the applicant's consultants and accepted by officers that the 'Do Nothing' alternative would leave the application site in its current state i.e., a site comprising a low rise office building which has been vacant since August 2022. It should be noted that it has also been established in the Southwark Plan that the site represents an opportunity to redevelop Elephant and Castle area to provide new and improved housing.

45. The 'Do Nothing' scenario is considered to have no environmental benefits compared with the proposed redevelopment of the site as the 'Do Nothing' scenario would leave a sustainable, brownfield site in inner London vacant and would not bring forward the various benefits associated with development such as new affordable housing, student accommodation, employment generating spaces, improved public realm, new public space, improved legibility and connectivity.

46. No alternative sites or locations have been considered for the proposed development as the site benefits from policy support to deliver a strategic development in this location. Additionally, there is an extant consent on the site to redevelop it for commercial, educational and flexible mixed uses.

47. The ES also describes the design evolution of the scheme which has been influenced by environmental factors, particularly townscape and heritage; LVMF Views; wind microclimate; daylight, sunlight and overshadowing; ecology and biodiversity; water resources; air quality, noise and transport. As such, the Proposed Development has been designed having full regard to the constraints and opportunities presented by the site as well as issues raised during the process.

Cumulative impacts

48. The ES considers cumulative effects arising from the proposed development in combination with other surrounding consented and planned developments and where relevant these effects are discussed further in the topic specific chapters later in the report.

49. A detailed assessment of the likely potential and residual impacts of the scheme is provided in the relevant sections of this report, taking into account the ES and the material planning policy considerations. In summary, officers are satisfied that the ES is adequate to enable a fully informed assessment of the environmental effects of the proposal.

Principle of the proposed development in terms of land use

Loss of Office Floorspace

50. Southwark Policy P28 (Access to employment and training) requires developments incorporating more than 5000sqm of gross floor area to provide training and jobs for local people in the construction stage.

51. London Plan Policy SD5 states that mixed-use developments should not lead to a net loss of office floorspace within the CAZ unless there is no demonstrable prospect of the Site being used for offices. This is reflected in Southwark Local Plan Policy P30 which stipulates that the loss of employment floorspace may be accepted in the CAZ, town centres and opportunity areas where the retention of employment floorspace on the Site is not feasible and must be demonstrated by a marketing exercise for two years immediately prior to any planning application.

52. Southwark Policy P31 (Affordable workspace) requires that developments retain small and independent businesses or ensure their provision of affordable, suitable spaces in new developments. Projects exceeding 500 sqm of employment floorspace must allocate at least 10% for affordable workspace at discounted rents, secured for 30 years, prioritising displaced or local small businesses.

53. The proposal relates to the provision of residential accommodation and delivery of a small amount of retail, food and beverage, medical services and office

floorspace. While the proposal includes approximately 2,050.80 sqm GIA of employment space, the existing original office space accounts for 32,297 sqm GIA and therefore the scheme would result in the net loss of 30,246.20 sqm of commercial of employment space.

54. Departure from London Plan Policy SD5 and Southwark Local Plan Policy P30 requirements have been carefully considered within the context of the site, surrounding area and strategic vision for the site and considered acceptable in this instance for the following reasons:

    1. The change of use application previously consented on the site (ref: 23/AP/0410) in August 2024 established the acceptability of the loss of employment floorspace in this location.
    2. A Marketing Statement, prepared by Allsops was submitted with the Application demonstrating that the office floorspace has been actively marketed since July 2022.
    3. The proposal seeks to provide some jobs within 2,050.80 sqm of flexible retail, food and beverage, medical services and office floorspace as well as part of the PBSA Block which will offset the loss of employment floorspace currently on the site.
    4. There has been substantial office development within the Borough, particularly in the Opportunity Area and the CAZ with large scale offices having come forward in clusters elsewhere such as The Shard Quarter Development, The Canada Water Masterplan, Bankside Yards East and The Blackfriars Road area. It is noted that the development of Bankside Yards East and The Blackfriars Road area will exceed the 166,000sqm office floor space target for 2036 set by ST1 of the Local Plan. In addition, the consent recently granted for 18 Blackfriars Road would deliver a further 150,000sm of office space. A significant amount of office accommodation has been granted consent in Southwark over the past 4 years which should ensure the strategic plan target set out in ST1 is met and exceeded.
    5. The Proposed Development will help to provide much needed affordable housing by providing 243 social rented and intermediate homes on the site, a significant contribution to Southwark annual housing target. The scheme would also meet the identified student needs of the Borough without the loss of any existing operational employment uses.
    6. A monetary contribution for the loss of employment floorspace will be secured as part of the s106 Agreement.

55. In accordance with Policy P31, employment training and apprenticeship opportunities at both construction and operational phases are to be secured by way of a Jobs and Training Specification as part of the S106 agreement, in accordance with Policy P28.

56. The scheme does not include any affordable workspace as part of the proposed employment floorspace and would therefore fail to meet the recruitments of Southwark Policy P31. As such a monetary contribution will be secured as part of the s106 Agreement based on the cost of the scheme to deliver 968.3 sq ft of affordable workspace.

57. Overall, while the development will result in a loss of office floorspace on the site, it will provide some employment opportunities by way of the flexible retail floorspace and PBSA Block. When considering the successful delivery of office schemes within the borough the proposals would not prejudice the delivery of the aspirations of the council's strategic target for employment set out in ST1 of the Southwark Plan. Furthermore, a financial contribution will be secured in the S106 Agreement for the loss of employment floorspace on the site as well as the provision of no affordable workspace. Lastly, the proposal would comply with Policy P31 in providing both opportunities for training and apprenticeships. As such the proposed development is considered acceptable and would not result in adverse harm to the Borough in terms of its employment and economic targets.

Delivery of housing

58. Policy H1 of the London Plan emphasises the urgent need to increase the supply of housing in London and sets out a 10-year housing of 23,550 new homes in Southwark up and until 2028/29. The policy states that Boroughs should 'optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, particularly those with a PTAL of 3-6 or within 800m of a station'.

59. The London Plan also recognises that student homes contribute toward a borough's housing target at a ratio of 2.5:1. This ratio is also recognised in Annex 4 of the Southwark Plan. The London Plan states the approach to monitoring net housing provision from different forms of non-self-contained accommodation is based on the amount of self-contained housing this form of supply will free up.

60. Southwark Policy SP1 (Homes for All) outlines a comprehensive strategy to increase housing supply and quality across Southwark. The policy aims to deliver at least 40,035 new homes between 2019 and 2036, with a target to provide a minimum 35% affordable housing, subject to viability, of which 25% should be social rented and 10% intermediate and an annual target of 2,355 homes per annum.

61. The proposal provides 1434 student rooms (PBSA) which would contribute the equivalent of 573 new residential dwellings toward meeting Southwark's housing delivery targets, based on the ratio of 2.5:1. In addition, 243 new affordable residential homes (71% social rent, 29% intermediate) are proposed which results in a total of 816 homes. The proposal would account for 34.6% of the Southwark's annual housing target and represents a significant contribution to meeting that target.

62. It is considered that the application is in accordance with Policy H1 of the London Plan and Policy SP1 and P1 of the Southwark Plan in delivering new homes to help meet Southwark's housing targets. The provision of the equivalent on site of 816 homes, 243 of which would be affordable homes, will assist the Council in addressing this housing need while also meeting housing delivery targets by delivering council housing.

Flexible Retail and Commercial Uses

63. Southwark Plan Policy P35 (Town and Local Centres) sets out retail requirements in the context of the evolving role of town centres, requiring new development to retain retail floorspace and provide an active use at ground floor level in locations with high footfalls.

64. AV.09 Elephant and Castle Area Vision of the Local Plan states that new development should support the area's function as a major town centre for all Southwark residents and a central London location that attracts global business, research, teaching, shopping, flexible business spaces and cultural activities.

65. The proposed development includes the provision of flexible Class E retail, food and beverage and commercial space for local businesses, including medical services, accounting for a total of 2050.80sqm of floorspace. All of the retail (Class E(a)) and food and beverage (Class E(b)) floor space would be located on the ground floor level fronting Skipton Circus / London Road, Ontario Street and Newington Causeway which will provide approximately 944.2sqm of active frontage. This is considered to be a considerable improvement to the existing situation of the site, as no retail spaces currently exist on the site at ground floor and would therefore be accordance with Policy P35.

66. In addition, the proposed development includes the provision of a further 1,106.60sqm of medical or health services (Class E(e)) and Office (Class g(i)) floorspace split between levels 1 and 2. This would deliver a considerable amount of community services and flexible business space for future residents of the development and wider Elephant and Castle Area, in accordance with AV.09 of the Local Plan.

67. Overall, it is considered that the proposed scheme has been designed to maximise the provision of jobs and economic activity through the provision of retail, food and beverage, office and medical and health services, majority of which will be located at the ground floor to active all frontages of the site. It is estimated that the proposed development will provide up to 116 direct full-time jobs, as noted in the ES submitted with the Application, which will further support the area's function as a major town centre for all Southwark residents. As such, it is considered that the proposal complies with Policy P35 and AV.09 Elephant and Castle Area Vision of the Local Plan.

Student Accommodation

68. Student housing is classified as non-self-contained accommodation and a 'sui generis' use in the Use Classes Order. Student accommodation is also considered as 'housing' for monitoring purposes through the Council's and GLA's monitoring reports.

69. Policy H15 of the London Plan sets an overall strategic requirement for purpose-built student accommodation (PBSA) of 3,500 bed spaces to be provided annually. The supporting text to Policy H15 is clear that PBSA contributes to meeting London's overall housing need and is not in addition to this need. Section 3.9 of the Mayor of London's Housing SPG states that specialist student

accommodation makes an essential contribution to the attractiveness of London as an academic centre of excellence.

70. Policy P5 of the Southwark Plan requires PBSA proposals where all the bedspaces would be ‘direct-lets’, as is the case with this scheme to:

    1. As a first priority deliver the maximum amount of PBSA alongside a minimum of 35% of the habitable rooms as conventional affordable housing (subject to viability);
    2. In addition to this provide 27% of student rooms let at a rent that is affordable to students as defined by the Mayor of London.

71. The student housing policies of the Southwark Plan and London Plan, Policy P5 and Policy H15 respectively, differ in two key ways:

    1. Policy H15 prioritises the delivery of the maximum viable number of affordable student rooms (and does not require student housing proposals to deliver conventional affordable housing either on- or off-site), whereas Policy P5 prioritises the delivery of conventional affordable housing; and
    2. Policy H15 expects at least 51% of the bedspaces (the majority) to be subject to a nominations agreement, whereas Policy P5 requires all the bedspaces in a nominations scheme to be subject to a nominations agreement subject to viability.

72. When assessing the principle of a student housing scheme, the policies outlined above require consideration of:

    1. the principle of introducing a student housing use to this site;
    2. the local and strategic need for student housing;
    3. whether the student housing would contribute to a mixed and inclusive neighbourhood;
    4. securing the accommodation for student occupation;
    5. whether a nominations agreement has been secured;
    6. securing the maximum level of affordable housing subject to viability; and
    7. whether adequate and functional accommodation and layouts would be provided.

73. The following paragraph of this report assesses the proposed development against these considerations. Later parts of this report will deal with the other matters that these policies refer to, such as the affordable housing offer, quality of accommodation and transport aspects.

74. This site is in an area identified for the provision of ‘as many homes as possible at a range of different tenures including social housing’ under AV.09 Elephant and Castle Area Vision of the Local Plan. Providing these homes is considered acceptable subject to other considerations including the provision of affordable housing and the design, scale and impact of development on neighbouring sites which are considered later in this report and the contribution the scheme would make to a mixed and inclusive neighbourhood. In all, the equivalent of 816

homes would be provided on the site (including the student homes) and of these 40% would be affordable.

75. Subject to design and amenity considerations the proposed conventional and student housing scheme would help to meet the Council's housing targets set out in the Southwark Plan and London Plan and deliver the housing capacity identified for this site.

76. For the reasons given above, the proposed conventional affordable housing and student accommodation use would help contribute to the strategic housing delivery targets of the development plan, including the Council's vision to "build more homes of every kind in Southwark and to use every tool at our disposal to increase the supply of all different kinds of homes", as set out in Southwark Plan Policy ST2.

Is there a local and strategic need for student housing?

77. There is a demand for more student accommodation across London, which needs to be balanced with making sure Southwark has enough sites for other types of homes, including affordable and family housing. The affordable housing element of the current application is considered further in a separate section of this report.

78. There are several higher education institutions (HEIs) in the borough with teaching facilities and student accommodation within proximity of the proposed scheme. These include London South Bank University (LSBU), Kings College London (KCL), University of the Arts (UAL) and London School of Economics and Political Science (LSE) which host a total of approximately 80,931 full time students.

79. The evidence base underpinning the Southwark Plan included a background paper on student housing, dated December 2019. It refers to the Council's Strategic Housing Market Assessment (SHMA) Update 2019, which found that:

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

80. The applicant has submitted a Student Demand Market Assessment prepared by Knight Frank as part of the Application which considers the economic impact of the proposed PBSA. It notes the following key points:

    1. The location of the proposed PBSA development is highly preferable as a location to live for students, in particular those studying at King's College London, University of the Arts London, London South Bank University and London School of Economics and Political Science.
    2. Currently, only 24.3% of full-time higher education students across London have access to university or private sector PBSA, while a further 23.6% are estimated to be living at home with parents or guardians. The

remaining 52.1% of full-time students in London are required to find accommodation within the private rented sector and HMOs and would otherwise be unable to access university or private sector purpose-built accommodation.

3. Full time student numbers studying within the catchment area and wider London market are likely to record strong growth over the next upcoming academic cycles to 2026/27, based on historic trends and market evidence.
4. The proposed scheme sits inside the Elephant & Castle 'Opportunity Area' as identified in the London Plan and is well served by public transport with transport links to local and London-wide university campuses.
5. When considering the immediate catchment of the proposed PBSA development at Skipton House, 8,568 full-time students living in the area are solely reliant on the private rental market for appropriate accommodation.
6. Looking ahead to future developments within the local area, there are 1,131 beds under construction within a one-mile radius of Skipton House.
7. There is a demand and supply imbalance, and it is unlikely that supply will keep pace with demand within the local area, and wider again in South East London. As a result of this imbalance, it is likely that students will continue to place more unwanted pressure on the local private rented market.

81. In summary, while the proposed accommodation would add to a number of pre-existing direct-let student housing developments in the borough, it would nevertheless contribute towards the borough's and London's stock of PBSA, for which there is an identified need. In this respect, the application addresses the overarching aim of Part A of London Plan Policy H15 and Policy P5 of the Southwark Plan.

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

82. Criterion 1 of London Plan Policy H15(A) requires student housing proposals to contribute to a mixed and inclusive neighbourhood.

83. The surrounding area is predominantly commercial, with shopping and town centre uses around Elephant and Castle Square and Walworth Road to the south. The Elephant and Castle Shopping Centre faces the recently pedestrianized Elephant Square. To the north of the Site are educational buildings associated with LSBU, ranging from 3 to 10 storeys. Also to the north is Eileen House, a recently redeveloped 11 residential complex with a 41-storey and an 8-storey building. Further north on Newington Causeway is the Ministry of Sound nightclub and the railway line running from Elephant and Castle to Blackfriars. To the south of the Site and directly below the red line boundary, is Elephant and Castle Underground Station while further South lies the University of Arts London. To the east of the Site, across Newington Causeway, is Metro Central Heights, a large residential building with commercial spaces on the ground floor.

84. The area has undergone significant transformation in recent years, with the rise of high-rise developments and regeneration by virtue of the area's designation

as an Opportunity Area.. The area now features a diverse mix of uses, including residential, educational, office, and retail spaces. In this surrounding land use context, the proposed student-housing led scheme with a significant on-site affordable housing element would sustain a mixed and inclusive neighbourhood through the introduction of an alternative residential product and demographic in addition to conventional affordable housing.

85. The impacts arising from the 2297 new residents (some student, some in the affordable housing) are discussed in the later relevant parts of this report (amenity, transport, Section 106 contributions etc.), along with the details of the mitigation secured. Mayoral and Community Infrastructure Levies, payable by the developer upon implementation of the development, can be channelled into the provision of new infrastructure to meet the needs of the local population. This is considered satisfactory with regard to mitigating the additional demand placed on local services and infrastructure as a result of the proposed student accommodation.

86. On this basis, the proposed land use is considered to in conformity with Southwark Plan and London Plan . Introducing a mix of student housing and conventional affordable housing into a CAZ, and one where conventional residential use are well represented, is not considered to cause harm and would contribute to a mixed and inclusive neighbourhood.

Is a nominations agreement in place?

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

88. The applicant does not intend to enter into a nomination's agreement with a HEI for any of the proposed accommodation; instead, the accommodation will be directly managed by an independent provider which is usually referred to as direct let student housing. The locally specific and more up-to-date student housing policy (Southwark Plan Policy P5) supports direct-let student housing subject to the provision of affordable housing (which is in turn subject to viability) and additionally a proportion of the student accommodation being affordable (27%). In this instance the on-site affordable housing element has been prioritised rather than the on-site affordable student housing provision. This has enabled the affordable housing provision to be delivered at 40% of the total habitable rooms on site and split 71% social rent and 29% intermediate housing.

89. Accordingly, it is considered that the development proposal complies with the affordable requirements that Policy P5 sets out for direct-let schemes.

Is the location suitable for student accommodation?

90. Part B of London Plan Policy H15 requires student housing scheme sites to be well connected by transport to local services. The proposed scheme is in a location that is readily accessible by cycle, public transport (underground, National Rail and bus) or on foot to university campuses. The scheme is a 3-minute walk to Elephant & Castle station, and less than a minute walk to Elephant and Castle Bakerloo Line station, offering easy access to wider

London. The site benefits from excellent accessibility to public transport (as reflected in its PTAL rating of 6b), services and established higher educational facilities. There are several universities with campuses within a 3-mile radius of the site including London South Bank University, King's College London, University of the Arts, Southwark College and the London School of Economics.

Summary on the principle of student housing

91. In conclusion, the site is considered to be appropriate in principle for student accommodation, meeting a demonstrable need and achieving compliance with the requirements of London Plan Policy H15 and Southwark Plan Policy P5. The proposal would provide high quality accommodation for students in an accessible and sustainable location meeting borough need and demand whilst also providing much needed conventional affordable housing contributing to a mixed and inclusive neighbourhood.

Conclusion on land use

92. The proposals include a range of uses which will make a significant contribution towards the role and function of area, through the provision of 1,106 sqm of flexible medical service and office floorspace, 1,011sqm of flexible food, beverage, retail and cafe floorspace, together with 1,434 purpose built student units and 243 new affordable residential homes to meet identified housing need. It will fulfil the requirements of Policy P35 and AV.09 Elephant and Castle Area Vision of the Local Plan to maximise the provision of jobs and economic activity through the provision of retail, food and beverage, office and medical and health services, majority of which will be located at the ground floor to active all frontages of the site. Together with the proposed student housing, this will deliver a significant uplift in new homes, the equivalent of 816 homes towards meeting the Council's housing targets whilst contributing to the creation of a mixed and inclusive community.

Affordable housing and development viability

93. Southwark's Development Viability SPD requires a Financial Viability Appraisal (FVA) to be submitted for all planning applications which trigger a requirement to provide affordable housing. Southwark's Development Viability SPD pre dates the current London Plan and Southwark Plan policies for student housing. Nonetheless the FVA should also identify the maximum level of affordable student housing that can be sustained as required by Policy P5 "Student Homes".

94. Policy H15 of the London Plan requires a proportion of student rooms to be subsidised and for the majority of units to be covered by a Nomination Agreement with a named higher education establishment. The London Borough of Southwark has taken a different approach. It requires the delivery of conventional affordable housing to be the priority within PBSA development and its policies that support that are more up to date than the London Plan. As such, and in accordance with the NPPF, the Local Plan policies take precedence.

95. Earlier parts of this report have explained the rationale for this proposal to deliver no on-site affordable student housing, and to instead deliver a 100% direct-let scheme and maximise the affordable housing provision. This results in the delivery of 243 new affordable homes comprising 957 affordable habitable rooms which is 40% of the total habitable rooms on the site; 28.4% of which would be social rent and 11.6% intermediate.

Tenure	Number of Units	Number of Habitable Rooms	% (Habitable Room)
Social Rent	171	679	28.4%
Intermediate	72	278	11.6%
Direct Let Student	1434	1434	60%
Total	1,677	2,391	100%

Table 2: Tenure split of accommodation

96. The applicant has submitted a Financial Viability Assessment (FVA) in accordance with the Affordable Housing SPD and Southwark Plan Policy P5 to allow an assessment of the maximum level of affordable housing that could be supported by the development. The appraisal was reviewed by Cluttons on behalf of the Council.

Findings of the viability review process

97. The applicant's FVA, prepared by DS2, establishes the proposed student housing scheme from a Benchmark Land Value (BLV) which is based on the Site's Existing Use Value (EUV) plus a 20% premium uplift. The FVA indicates a Residual Land Value (RLV) for the site of £25,436,350 and a BLV of £40,202,881. The FVA concludes that the proposed scheme exceeds the maximum viable quantum of affordable housing and would result in a deficit of around £14m, after allowing for a developer profit.

98. Cluttons' review on the scheme on behalf of the council, having reached a different RLV and BLV to DS2, indicates that the scheme could viably support a 40% affordable housing on the site as is proposed. Their assessment shows that the scheme would provide a significant surplus. Considering the differences between the specialists, the offer of 40% affordable housing is considered to be maximum viable.

Conclusion on development viability

99. To achieve this high level of affordable provision, the proposal is being put forward on the basis of having no Nominations Agreement in place and for the student accommodation to be direct let without any affordable student housing on site. Given the significant affordable housing delivery being achieved as a result, this approach is considered to be acceptable.

100. With an implementation-dependent Early Stage Review to be imposed through the Section 106 Agreement, officers consider that the maximum viable amount of affordable housing has been secured, in accordance with policy P5 of the Southwark Plan.

Housing mix

101. Policy H10 of the London Plan states that residential schemes should generally consist of a range of unit sizes, with applicants and decision-makers having due regard to a number of considerations, including the housing evidence base, delivering mixed and inclusive neighbourhoods, the nature and location of the Site together with the aim of optimising the potential of housing site. Southwark Plan Policy P2 sets out the housing mix for major residential developments. This includes a minimum of 60% of homes with two or more bedrooms and within the suburban zone, 20% of family homes with three or more bedrooms in the Central Activities Zone (CAZ).

    The table below summarises the residential housing mix of the Proposed Development.

Residential Homes	Quantity	Unit Mix	No. Habitable Rooms	% Habitable Rooms	Occupancy
1 Bed	77	32%	231	24%	154
2 Bed	108	44%	432	45%	419
3 Bed	58	24%	294	31%	290
Total	243		957		863

Table 3: Residential housing mix by habitable room and occupancy

102. The proposed development would achieve a housing mix of 68.3% homes with two or more bedrooms and 24.8% homes with three or more bedrooms and therefore meets the requirements of Policy P2. The provision of larger family homes as part of the development is particularly welcome.

Quality of Accommodation

Student Accommodation

103. London Plan Policy H15 requires purpose-built student accommodation to provide adequate functional living space.

104. There are no specific housing standards for student housing and given the different needs and management of student housing in comparison to conventional housing, it is not appropriate to apply standard residential design standards to student housing. The student rooms themselves comprise a range of flexible room types from standard studios to premium studios to suit varying needs and include a range of size, configuration, and furnishing options; all of which will have integrated storage, study area with desk, kitchen facilities and will be provided with an ensuite shower room.



Image 9: Illustration of typical studio student room.

105. All residents would have access to shared student amenity split between a central shared facility between the entrances that connect the two student buildings and the distributed rooms across the upper levels. The larger central element comprises a large atrium, surrounded by a variety of uses including study, lounge and café and feature ‘learning steps’ at the ground floor with multiple seating areas, leading up to quiet study spaces and separate private dining and games room on level 1 and co-working spaces and outdoor amenity on level 2.



Image 10: Visualisation of learning steps and first and second floor amenity spaces within the PBSA Building.

106. Additional communal amenity are provided throughout the building including an 'active link' on levels 3, 4 and 5 which includes a gym, cardio room, break out spaces and wellness studio with outdoor amenity to support a variety of active opportunities. At the upper levels, facilities such as private dining, cinema and laundry rooms as well as creative hubs are spread across level 6, 8, 10 and 20. A total of 3,213.5 sqm of indoor communal amenity space and 167.9 sqm of outdoor amenity space will be provided for access to students.



Image 11: Visualisation of the active link and potential fit out of upper level amenity in the PBSA building

107. SP Policy P5 requires 5% of student rooms to be wheelchair accessible. A total of 80 rooms are provided across the PBSA Building and will be designed to accommodate wheelchair users meeting the requirements of Building Regulations M4(3) 'wheelchair user dwellings' which accounts for 5.58% of the total student bedrooms, exceeding the minimum requirement set by local policy. These rooms are centrally located, benefiting from easy access to the lift lobby

to ensure accessibility for wheelchair users. The provision of wheelchair user accommodation will be secured through the Section 106 Legal Agreement.

Quality of Affordable Housing

108. The proposed residential building would deliver high-quality accommodation. It follows the principles of inclusive design, with 88.5% of all units to meet M4(2) standards – this includes 11.5% (28 homes) delivered as wheelchair adaptable under M4(3), of which would also account for 10% of the social rented units (18 homes) required under SP Policy P8.

109. The design of the 243 new homes would all meet or exceed the minimum space standards prescribed by the Southwark Plan and Nationally Prescribed Space Standard (NPSS), with all apartments achieving floor to ceiling heights of at least 2.5m throughout or at minimum, in living rooms and bedrooms. 67% of the apartments have also been designed to be dual or enhanced aspect to maximise natural light and ventilation and there would be no north facing single aspect flats. The Application Scheme provides a high standard of residential design with short corridor distances, ensuring that no more than six dwellings are accessed from a single core per floor. In addition, all flats would have access to private outdoor balcony space in the form of 10sqm inset balconies regardless of unit size in accordance with Local Plan Policy P15, as well as communal amenity space on the podium level accounting for 160sqm. Further shared elements have been incorporated to enhance the amenity of residents including dedicated utility areas, dedicated bulky waste storage areas at basement level and clear arrival zones / threshold space while offering views out of the entrance. Lastly, the affordable homes would have access to significant public realm and landscape works which are proposed along Ontario Street, Newington Causeway and Skipton Circus including play space, gardens, seating and break out and event spaces, which comprise a significant benefit of the scheme.



Image 12: Typical unit layouts (1 bed and 3 bed affordable residential apartments)



Image 13: Illustration of the internal layout of a typical affordable home

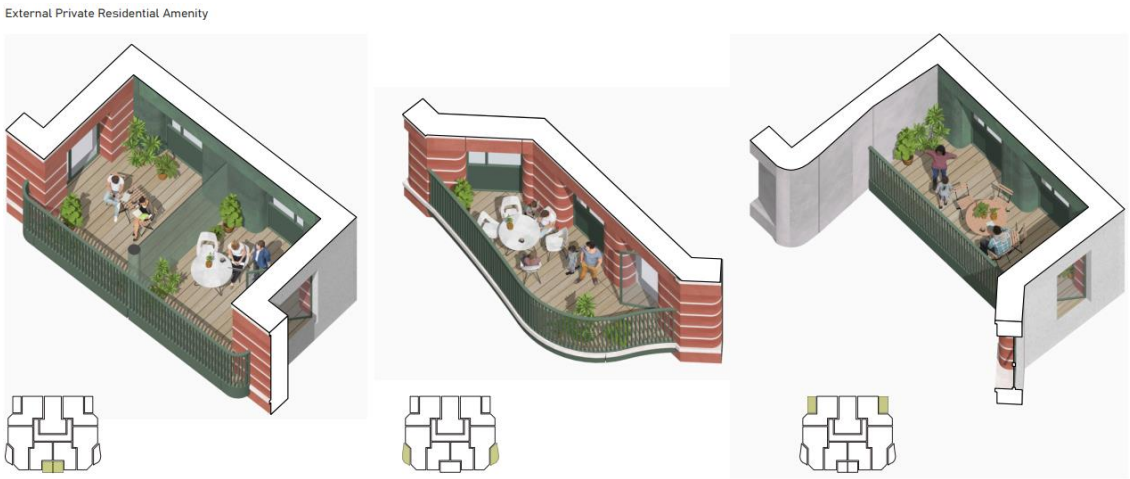


Image 14: Illustration of the external private amenity spaces of a typical affordable home



Image 15: Illustration of the communal outdoor residential amenity spaces and including playspace (podium level)

110. Overall, the Application Scheme is considered to represent a high standard of design quality of both the residential and student accommodation. All homes will have access to indoor and outdoor amenity space and the scheme has been designed to be inclusive and accessible across the student and residential blocks. As such, the proposal is considered to accord with requirements of the Local Plan.

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

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

Daylight and sunlight

112. The NPPF sets out guidance with regards to daylight/sunlight impact and states “when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site”. The intention of this guidance is to ensure that a proportionate approach is taken to applying the BRE guidance in urban areas. London Plan Policy D6 sets out the policy position regarding this matter and states “the design of development should provide sufficient daylight and sunlight to new and surrounding houses that is appropriate for its context”. Policy D9 states that daylight and sunlight conditions around tall building(s) and the neighbourhood must be carefully considered. Southwark Plan policies identify the need to properly consider the impact of daylight/sunlight without being prescriptive about standards.

BRE Daylight Tests

113. The BRE Guidance sets out the rationale for testing the daylight impacts of new development through various tests. The first and most readily adopted test prescribed by the BRE Guidelines is the Vertical Sky Component assessment (VSC). This test considers the potential for daylight by calculating the angle of vertical sky at the centre of each of the windows serving the residential buildings which look towards the site. The target figure for VSC recommended by the BRE is 27%, which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE have determined that the daylight can be reduced by approximately 20% of the original value before the loss is noticeable.

114. The second method is the No Skyline (NSL) or Daylight Distribution (DD) method, which assesses the proportion of the room where the sky is visible and plots the change in the No 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

115. 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:

    1. 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
    2. 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.

116. 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. As a result, they advise that the impact of existing balconies can be demonstrated by carrying out additional PSH calculations, for both the existing and proposed situations, with the balconies notionally removed.

117. The applicant has undertaken a daylight and sunlight assessment contained in Chapter 9 of the ES which has analysed the impacts of overshadowing to the daylight and sunlight amenity of the following neighbouring properties:

    1. Two Fifty-One (former Eileen House) – Block A
    2. Metro Central Heights (MCH) North
    3. MCH South
    4. MCH West
    5. MCH Vantage
    6. West Combe Apartments
    7. Perronet House
    8. 7-19 (odds) Princess Street
    9. 8-22 (evens) Gaywood Street
    10. Shopping Centre Site – East Site.

118. The analysis of overshadowing impacts to these properties have been considered in two stages:

    1. Stage 1 - Is there a strict compliance with the BRE Guidelines?
    2. Stage 2 - Is there “unacceptable loss” to the daylight and sunlight as a result of the Proposed Development?

    And also broken this down further into two scenarios which compare:

    1. Existing Scenario vs Proposed Scenario
    2. 2016 Consented Scheme vs Proposed Scenario

119. A total of 2,233 windows serving 1,295 residential habitable rooms in 25 properties surrounding the Project Site were assessed for daylight and 309 rooms in 15 properties which were assessed for sunlight. These have all been assessed in terms of both VSC and NSL and the results are set out in the two tables below:

No.	Property Address	No. of Windows Tested	Windows Inside VSC (No.)	Windows Inside VSC (%)	Windows Outside VSC Guidelines					
					Low (No.)	**Low (%)**	**Medium (No.)**	**Medium (%)**	**High (No.)**	**High (%)**
1	Two Fifty-One – Block A	1002	750	75%	32	3%	35	3%	185	18%
2	MCH North	168	75	45%	47	28%	37	22%	9	5%
3	MCH East	22	22	100%	-	-	-	-	-	-
4	MCH South	148	145	98%	3	2%	-	-	-	-
5	MCH West	222	116	52%	41	18%	35	16%	30	14%
6	MCH Vantage	40	40	100%	-	-	-	-	-	-
7	West Combe Apartments	46	34	74%	6	13%	2	4%	4	9%
8	Perronet House	306	162	53%	70	23%	49	16%	25	8%
9	7 Princess Street	6	6	100%	-	-	-	-	-	-
10	9 Princess Street	6	6	100%	-	-	-	-	-	-
11	11 Princess Street	6	6	100%	-	-	-	-	-	-
12	13 Princess Street	6	6	100%	-	-	-	-	-	-
13	15 Princess Street	6	6	100%	-	-	-	-	-	-
14	17 Princess Street	6	3	50%	3	50%	-	-	-	-
15	19 Princess Street	6	0	0%	6	100%	-	-	-	-
16	8 Gaywood Street	2	2	100%	-	-	-	-	-	-
17	10 Gaywood Street	7	7	100%	-	-	-	-	-	-
18	12 Gaywood Street	2	2	100%	-	-	-	-	-	-
19	14 Gaywood Street	5	5	100%	-	-	-	-	-	-
20	16 Gaywood Street	2	2	100%	-	-	-	-	-	-
21	18 Gaywood Street	5	4	80%	1	20%	-	-	-	-
22	20 Gaywood Street	2	2	100%	-	-	-	-	-	-
23	22 Gaywood Street	5	4	80%	1	20%	-	-	-	-
24	31-44 London Road	108	79	73%	27	25%	2	2%	-	-

25	Shopping Centre Site – East	99	99	100%	-	-	-	-	-	-
TOTAL		**2233**	**1583**	**71%**	**237**	**11%**	**160**	**7%**	**253**	**11%**

Table 4: Existing Baseline vs Proposed Development VSC Results

No.	Property Address	No. of Rooms Tested	Rooms Inside NSL (No.)	Rooms Inside NSL (%)	Rooms Outside NSL Guidelines					
					Low (No.)	**Low (%)**	**Medium (No.)**	**Medium (%)**	**High (No.)**	**High (%)**
1	Two Fifty-One – Block A	419	405	97%	14	3%	-	-	-	-
2	MCH North	136	127	93%	7	5%	2	1%	-	-
3	MCH East	22	22	100%	-	-	-	-	-	-
4	MCH South	95	95	100%	-	-	-	-	-	-
5	MCH West	157	155	99%	1	1%	-	-	1	1%
6	MCH Vantage	28	28	100%	-	-	-	-	-	-
7	West Combe Apartments	26	21	81%	1	4%	3	12%	1	4%
8	Perronet House	184	183	99%	1	1%	-	-	-	-
9	7 Princess Street	4	4	100%	-	-	-	-	-	-
10	9 Princess Street	4	4	100%	-	-	-	-	-	-
11	11 Princess Street	4	4	100%	-	-	-	-	-	-
12	13 Princess Street	4	3	75%	1	25%	-	-	-	-
13	15 Princess Street	4	3	75%	1	25%	-	-	-	-
14	17 Princess Street	4	1	25%	2	50%	-	-	1	25%
15	19 Princess Street	4	1	25%	3	75%	-	-	-	-
16	8 Gaywood Street	2	2	100%	-	-	-	-	-	-
17	10 Gaywood Street	4	4	100%	-	-	-	-	-	-
18	12 Gaywood Street	2	2	100%	-	-	-	-	-	-
19	14 Gaywood Street	2	2	100%	-	-	-	-	-	-
20	16 Gaywood Street	2	2	100%	-	-	-	-	-	-
21	18 Gaywood Street	4	4	100%	-	-	-	-	-	-
22	20 Gaywood Street	2	2	100%	-	-	-	-	-	-
23	22 Gaywood Street	4	4	100%	-	-	-	-	-	-
24	31-44 London Road	98	84	86%	9	9%	3	3%	2	2%

25	Shopping Centre Site – East	79	79	100%	-	-	-	-	-	-
TOTAL		1296	1243	96%	40	3%	8	1%	5	0%

Table 5: Existing Baseline vs Proposed Development NSL Results

120. Of the 25 buildings assessed, 12 properties would meet the BRE guidance for both VSC and NSL and therefore experience negligible impacts in terms of daylight. Given their BRE compliance, the following properties have been excluded from this assessment:

    1. MCH East
    2. MCH Vantage
    3. 7, 9 & 11 Princess Street
    4. 8-16 (evens) & 20 Gaywood Street
    5. Shopping Centre Site – East Site

    The remaining properties will be discussed in more detail.

    Two Fifty One – Block A

121. This property is a 41 storey mixed use building located to the north of the Site. A total of 1002 windows and 419 rooms were assessed, up to floor 30, with respect to VSC and NSL. A total of 750 windows (75%) and 405 rooms (97%) would remain BRE Compliant. Of the remaining 252 windows:

    1. 32 would experience a reduction of between 20% - 30% which is considered a minor level of impact.
    2. 35 would experience a reduction of between 30% - 40% which is considered a moderate level of impact.
    3. 185 would experience a major reduction of between 40% - 50% which is considered a major adverse impact

    With regards to NSL, all 14 rooms would experience minor level impacts. It is noted that these rooms are associated with bedrooms which typically have a lower expectation for daylight and would still retain between 76% to 79% NSL, falling short of the 80% target.

122. With regard to sunlight, 79 out of 80 living room windows would comply with the BRE APSH. It is noted that the single room impacted would experience a major adverse impact however, the residual sunlight would be 24%, almost meeting the 25% annual target and additionally, would comply with winter sunlight guidelines. In this regard, the sunlight impacts to this property are considered to be negligible.

123. When considering the impacts between 2016 consented scheme and proposed development, it is noted that the retained daylight levels for all windows would either meet the BRE guidelines or, be in line with or see a betterment in both VSC and NSL values.

124. Overall, most windows (75%) would experience minimal impacts which are within the BRE Guidelines. While it is noted that 252 windows have been identified to experience VSC reductions beyond the 20%, these impacts are

considered acceptable given 98% of all rooms would remain BRE compliant in terms of sunlight and comply with the APSH. Furthermore, given the location of the site within central London / the Elephant and Castle CAZ and that the proposed scheme would result in compliant, neutral or improved VSC and NSL values when compared with the consented scheme, these impacts are considered acceptable in this instance.

MCH North

125. This building is an 18 storey residential building located to the east of the Site. A total of 168 windows and 136 rooms were assessed with respect to VSC and NSL. A total of 75 windows (45%) and 127 rooms (93%) would remain BRE Compliant.

126. Of the remaining 93 windows which would fall outside of the BRE Guidelines for VSC, 47 would experience a minor level of impact, 37 a moderate level of impact and 9 a major adverse impact. It is noted that the residual VSC values for the adversely impacted windows range from between 6.2% to 26.8%, averaging 16.5%, compared to the BRE target of 27%.

127. With regards to NSL, 9 rooms would fall outside the BRE guidelines, with 7 rooms experiencing minor impacts and 2 rooms experiencing moderate impacts. It is noted that affected rooms are associated with three living rooms and six kitchens. The residual NSL value for he adversely impacted rooms range from between 66% to 78%, averaging 72%, compared to the BRE target of 80%.

128. With regard to sunlight, 51 (75%) out of 68 living room windows would comply with the BRE APSH. Out of the 17 (25%) rooms which would fall outside the BRE guidelines, 3 rooms would experience minor impacts, 6 rooms moderate impacts and 8 rooms major adverse impacts. It is also noted that 2 rooms would fall outside the winter sunlight guidelines and experience major adverse impacts.

129. When considering the impacts between 2016 consented scheme and proposed development, the retained daylight levels for majority of the windows would either meet the BRE guidelines or, be in line with or see a betterment in terms of VSC values. It is noted that a limited number of windows would experience an increased impact however, in terms of VSC this accounts for a 0.5% absolute change while all rooms would meet the NSL target of 80%. Similarly, retained sunlight levels for all rooms would be in line or meet the BRE guidelines.

130. Overall, while it is noted that 93 windows have been identified to experience VSC reductions beyond the 20%, these impacts are considered acceptable given majority of these windows would retain high residual VSC values and 93% of the associated rooms would remain BRE compliant in terms of NSL. Furthermore, of these windows impacted, it is noted that majority would experience compliant, neutral or improved VSC values when compared with the consented scheme and be fully compliant in terms of NSL values. Lastly, no rooms would experience increased sunlight impacts when compared to the consented scheme. On balance, it is considered that the impacts to daylight and/or sunlight would not be harmful to the occupiers' residential amenity and are acceptable against the wider benefit so the development.

MCH South

131. This building is an 12 storey mixed-use building located to the south east of the Site. A total of 148 windows and 95 rooms were assessed with respect to VSC and NSL. A total of 145 windows (98%) and all 95 rooms would remain BRE Compliant.

132. Of the 3 windows which would fall outside of the BRE Guidelines for VSC, all would experience minor impacts. It is noted that one window serves a single aspect window located underneath a projecting bay and therefore has a relatively low existing VSC value when compared to other windows which are unrestricted on the same level. The remaining two windows are associated with small secondary windows located on the elevations of projecting bays with the main windows serving living/kitchen/dining areas on these elevations all meeting the BRE guidance for VSC. In terms of sunlight, this property would also meet the BRE Guidelines for both annual and winter sunlight.

133. Overall, given the small VSC impacts associated with the secondary or already restricted windows identified above and BRE ASPH compliance, it is considered that the impacts to daylight and/or sunlight would not be harmful to the occupiers' residential amenity and are acceptable.

MCH West

134. This building is an 11 storey mixed use building located to the east of the Site. A total of 222 windows and 157 rooms were assessed with respect to VSC and NSL. A total of 116 windows (52%) and 155 rooms (99%) would remain BRE Compliant.

135. Of the remaining 106 windows which would fall outside of the BRE Guidelines for VSC, 41 would experience a minor level of impact, 35 a moderate level of impact and 30 a major adverse impact. It is noted that the residual VSC values for the adversely impacted windows range from between 5.6% to 26.6%, averaging 16.1%, compared to the BRE target of 27%.

136. With regards to NSL, 2 rooms would fall outside the BRE guidelines, with the magnitude of impact being minor for one room and adverse for one room. It is noted that the affected rooms are associated with bedrooms which typically have a lower expectation for daylight and would still retain NSL values between 59% to 71%, falling short of the 80% target.

137. With regard to sunlight, 40 rooms (98%) out of 41 living rooms assessed would comply with the BRE APSH. The one room which would fall outside the annual sunlight guidance would experience minor impacts and retain a residual sunlight value of 19%, compared to the 25% target.

138. When considering the impacts between 2016 consented scheme and proposed development, the retained daylight levels for over 50% of the windows and rooms would either meet the BRE guidelines or, be in line with or see a betterment in terms of VSC and NSL values. It is noted that a limited number of windows would experience an increased impacts however, in terms of VSC this

accounts for a 2.2% absolute change with most retaining VSC values between 10% - 20% which is not considered unreasonable in a central London location. Similarly, in terms of NSL, only two rooms would fail to meet the 80% target (58% and 71% respectively) when compared to the consented scheme which again is considered reasonable given the urban location.

139. Overall, while it is noted that 106 windows have been identified to experience VSC reductions beyond the 20%, these impacts are considered acceptable given majority of these windows would retain high residual VSC values and 99% of the associated rooms would remain BRE compliant in terms of NSL. Furthermore, of the two windows impacted, it is noted these are associated with bedrooms which typically have a lower expectation for daylight however still maintaining a reasonable residual NSL values. Lastly, the proposed scheme is comparable with the consented scheme in terms of VSC and NSL values and would ensure reasonable residual values are still maintained to those windows impacted. On balance, it is considered that the impacts to daylight and/or sunlight would not be harmful to the occupiers' residential amenity and are acceptable against the wider benefit so the development.

West Combe Apartments

140. This building is an 4 storey mixed use building located to the south east of the Site. A total of 46 windows and 26 rooms were assessed with respect to VSC and NSL. A total of 34 windows (74%) and 21 rooms (81%) would remain BRE Compliant.

141. Of the remaining 12 windows which would fall outside of the BRE Guidelines for VSC, 6 would experience a minor level of impact, 2 a moderate level of impact and 4 a major adverse impact. Of the 5 rooms which would fall outside the BRE guidelines for NSL, 1 would experience minor impacts, 3 a moderate level of impact and 1 major adverse impact.

142. Due to orientation and/or room use there are no windows within this building which qualify for a sunlight assessment against the BRE APSH.

143. Overall, while it is noted that 12 windows and 5 rooms have been identified to experience VSC and NSL reductions beyond the 20%, these impacts are considered acceptable given the modest number of windows which would experience moderate – adverse impacts (6 windows and 4 rooms) and the Central London location. On balance, it is considered that the impacts to daylight and/or sunlight would not be harmful to the occupiers' residential amenity and are acceptable against the wider benefit so the development.

Perronet House

144. This building is an 11 storey residential building located to the south west of the Site. A total of 306 windows and 184 rooms were assessed with respect to VSC and NSL. A total of 162 windows (53%) and 183 rooms (99%) would remain BRE Compliant.

145. Of the remaining 144 windows which would fall outside of the BRE Guidelines for VSC, 70 would experience a minor level of impact, 49 a moderate level of

impact and 25 a major adverse impact. It is noted that the residual VSC values for the adversely impacted windows range from between 3.6% to 26.8%, averaging 15.2%, compared to the BRE target of 27%. With regard to the one room which would be outside of the BRE Guidance for NSL, the magnitude of impact would be minor with a retained residual NSL value of 62%. In terms of sunlight, this property would also meet the BRE Guidelines for both annual and winter sunlight.

146. Overall, while it is noted that 144 windows have been identified to experience VSC reductions beyond the 20%, these impacts are considered acceptable given majority of these windows would retain high residual VSC values and 99% of the associated rooms would remain BRE compliant in terms of NSL. In addition, this property would meet the BRE Guidelines for sunlight. On balance, the impacts to daylight and/or sunlight would not be harmful to the occupiers' residential amenity and are acceptable against the wider benefit so the development.

13 Princess Street

147. This building is a 3 storey residential building located to the south west of the Site. A total of 6 windows and 4 rooms were assessed with respect to VSC and NSL. All windows and 3 rooms (75%) would remain BRE Compliant.

148. With regard to the one room which would be outside of the BRE Guidance for NSL, the magnitude of impact would be minor with a retained residual NSL value of 33%, compared to the baseline figure of 46%. In terms of sunlight, this property would also meet the BRE Guidelines for both annual and winter sunlight.

149. Overall, the impacts to daylight and/or sunlight would not be harmful to the occupiers' residential amenity and are acceptable.

15 Princess Street

150. This building is a 3 storey residential building located to the south west of the Site. A total of 6 windows and 4 rooms were assessed with respect to VSC and NSL. All windows and 3 rooms (75%) would remain BRE Compliant.

151. With regard to the one room which would be outside of the BRE Guidance for NSL, the magnitude of impact would be minor with a retained residual NSL value of 60% which is considered reasonable in a central London location. In terms of sunlight, this property would also meet the BRE Guidelines for both annual and winter sunlight.

152. Overall, the impacts to daylight and/or sunlight would not be harmful to the occupiers' residential amenity and are acceptable.

17 Princess Street

153. This building is a 3 storey residential building located to the south west of the Site. A total of 6 windows and 4 rooms were assessed with respect to VSC and NSL. A total of 3 windows (50%) and 1 room (25%) would remain BRE Compliant.

154. All 3 windows which would fall outside of the BRE Guidelines for VSC would experience a minor level of impact. Of the 3 rooms which would fall outside the BRE guidelines for NSL, 2 would experience minor impacts while 1 would experience a major adverse impact. In terms of sunlight, this property would also meet the BRE Guidelines for both annual and winter sunlight.

155. While this property would experience impacts beyond the BRE Guidance, the overall effect would be minor adverse and would retain good levels of daylight for an urban environment such as this. Overall, the impacts are considered acceptable.

19 Princess Street

156. This building is a 3 storey residential building located to the south west of the Site. A total of 6 windows and 4 rooms were assessed with respect to VSC and NSL. No windows and 1 room (25%) would remain BRE Compliant.

157. The 6 windows and 3 rooms which would fall outside of the BRE Guidelines for VSC and NSL would experience a minor level of impact. In terms of sunlight, this property would also meet the BRE Guidelines for both annual and winter sunlight.

158. While this property would experience impacts beyond the BRE Guidance, the overall effect would be minor adverse and would retain good levels of daylight and sunlight for an urban environment such as this. Overall, the impacts are considered acceptable.

18 Gaywood Street

159. This building is a 3 storey residential building located to the south west of the Site. A total of 5 windows and 4 rooms were assessed with respect to VSC and NSL. A total of 4 windows (80%) and all 4 rooms would remain BRE Compliant.

160. The 1 window which would fall outside of the BRE Guidelines for VSC would experience a minor level of impact and is associated with a bedroom, which typically experience lower levels of daylight. All rooms would be within the BRE Guidance for NSL and in terms of sunlight, this property would also meet the BRE Guidelines for both annual and winter sunlight.

161. Overall, the impacts to daylight and/or sunlight would not be harmful to the occupiers' residential amenity and are acceptable.

22 Gaywood Street

162. This building is a 3 storey residential building located to the south west of the Site. A total of 5 windows and 4 rooms were assessed with respect to VSC and NSL. A total of 4 windows (80%) and all 4 rooms would remain BRE Compliant.

163. The 1 window which would fall outside of the BRE Guidelines for VSC would experience a minor level of impact and has an existing VSC value of 12.8% which compared to the actual reduction of 2.9% which is not considered to result in a significantly harmful reduction. In addition, the window is serves a bedroom, which typically experience lower levels of daylight. All rooms would be within the BRE Guidance for NSL and in terms of sunlight, this property would also meet the BRE Guidelines for both annual and winter sunlight.

164. Overall, the impacts to daylight and/or sunlight would not be harmful to the occupiers' residential amenity and are acceptable.

31 - 44 London Road

165. This building is an 6 storey residential building located to the west of the Site. A total of 108 windows and 98 rooms were assessed with respect to VSC and NSL. A total of 79 windows (73%) and 84 rooms (86%) would remain BRE Compliant.

166. Of the remaining 29 windows which would fall outside of the BRE Guidelines for VSC, 27 would experience a minor level of impact, while 2 would experience a moderate level of impact. It is noted that the residual VSC values for the impacted windows are in the mid-teens which is reasonable for a central London location. For those windows with lower residual VSC values, these are associated with windows with low existing VSC values, leading to a greater percentage change.

167. With regard to the 14 rooms which would be outside of the BRE Guidance for NSL, 9 rooms would experience a minor impact, 3 rooms a moderate impact and 2 a major adverse impact. All rooms would retain residual NSL value of 50% or greater which is considered reasonable in an urban location.

168. With regard to sunlight, 9 rooms (82%) out of 11 rooms assessed would comply with the BRE APSH. The two room which would fall outside the annual sunlight guidance would experience minor impacts and retain a residual sunlight value of 20% and 23%, compared to the 25% target.

169. Overall, while it is noted that 29 windows and 14 rooms have been identified to experience VSC and NSL reductions beyond the 20%, these impacts are considered acceptable given majority of these windows would retain high residual VSC and NSL values. It is also noted that the adverse impacts are associated with those windows with typically low existing VSC and NSL values. Similarly, with regard to sunlight, all rooms impacted would retain high residual APSH values. On balance, it is considered that the impacts to daylight and/or sunlight would not be harmful to the occupiers' residential amenity and are acceptable against the wider benefit so the development.

Conclusion on daylight and sunlight

170. In total, the development would result in 237 minor (11%), 160 moderate (7%) and 253 substantial adverse (11%) reductions in VSC for surrounding properties. With respect to NSL, there would be a total of 40 minor (3%), 8 moderate (0.6%) and 5 substantial (0.4%) reductions for surrounding properties. This equates to a total of 29% of windows assessed not meeting the BRE's recommendation for VSC and 4% of rooms assessed not meeting the BRE guidance for the NSL. These exceedances of the BRE guidance, and the negative impact they would have on neighbour amenity, should be given some weight in determining the application.

171. However, when interpreting the daylight losses, regard must be had to the existing nature of the site, as well as its location within a medium-high scale mixed use and commercial environment within Central London. Where there are reductions in excess of the guidance, this is largely due to windows which overlook a modest scale development on the existing site, when compared to surrounding taller buildings and thus experience uncharacteristically high levels of existing daylight. It is also noted that some of the most impacted properties have low existing VSC values, as a result of which any meaningful development on neighbouring land would generate sizeable percentage losses.

172. It is also worth noting that most properties would experience no change or an improvement to their daylight and sunlight when compared with the 2016 consented scheme, with the exception of a limited number of windows within MCH North and MCH West which will see a marginal reduction of between 0.5% - 2.2% in their VSC which is considered to be unnoticeable. Furthermore, all windows would meet the BRE criteria for APSH when compared to the consented scheme while a total of 21 rooms (7%) would fail to the meet the annual sunlight guidelines and 2 rooms (1%) would fail to meet the winter sunlight guidelines which is considered to be negligible.

173. Given the location of the site within central London / the Elephant and Castle CAZ, where more intensive development is expected and where the BRE guidelines should be applied flexibly following the design-led approach to density promoted by the London Plan, the impacts are on balance acceptable. As noted above, the BRE guidelines are not mandatory and the advice within the guide should not be seen as an instrument of planning policy. Whilst the majority of windows tested meet BRE requirements, a relatively small minority of the impacts would go beyond the recommended guidelines which are not of such significance that would warrant a reason for refusal of an otherwise acceptable development.

Overshadowing of amenity spaces

174. Section 3.3.17 of the BRE Guidelines recommend that at least half of a garden or amenity area should receive at least two hours of sunlight on the 21st of March. If, as a result of new development, an existing garden or amenity area does not meet this and the area which can receive two hours of sun on the 21st of March is less than 0.8 times its former value, then the loss of sunlight is likely to be noticeable. If a detailed calculation cannot be carried out, it is

recommended that the centre of the area should receive at least two hours of sunlight on 21st March.

175. The applicant has considered the impact of the development on overshadowing to existing surrounding amenity spaces at the following properties:

1. Two Fifty-One – Block A (A1)
2. Two Fifty One – Block A (A2)
1. MCH North (A3)
2. MCH West (A4)
3. Southbank Technopark (A5)
4. Perry Library (A6)

5 amenity spaces (83%) would meet the recommended guidelines on 21st March. The remaining amenity space which would not meet the BRE Guidelines is Two Fifty One – Block A (A2) and is discussed below in detail.

176. At present, 99% of the amenity area of Two Fifty One – Block A (A2) receives at least 2 hours of direct sunlight on 21st March. As a result of the proposed development this would decrease to 17%, equating to a former value of 0.17 which is considered to be a adverse significant impact. A further assessment was undertaken on 21st June, being the summer solstice, for this property. The results confirm that the 79% of the total amenity space would receive at least 2 hours of direct sunlight in both existing and proposed scenarios during this time of the year. Therefore, there would be no alteration to sunlight levels during the summer months when there is a higher expectation of sunlight and it is reasonably expected that outside amenity spaces will be fully utilised.



Image 16: Two-hour sun on ground study (21st March and 21st June)

177. Overall, the direct impacts of the proposed development on adjoining amenity spaces are considered to be negligible to 83% of adjoining properties which would retain all if not most existing levels of solar access to these areas. Whilst it is acknowledged that the adjoining outdoor amenity spaces of Two Fifty One – Block A (A2) will be adversely impacted, it is noted that during the summer months, sunlight levels to these areas would be unaffected and would remain compliant with the BRE Guidelines. As such, the proposed impacts are considered acceptable and would not be unduly harmful to the outdoor amenity of adjoining residents.

Solar Glare

178. A total of 12 nearby viewpoints have been considered for impacts as a result of solar glare. This analysis has identified instances of solar glare that may occur throughout the year at various times of the day depending on the exact point of observation. The results of the solar glare analysis show that five (42%) viewpoints tested will experience no instances of glare within 30° of the central line of sight or any potential instances of glare would be within 10° and 30° for a short period of time. As such, these viewpoints would experience a negligible (non-significant) impact.

179. The remaining seven viewpoints which would be effected are listed below:

1. Viewpoint 1 (Road, travelling south on London Road) – Minor Impact
2. Viewpoint 1 (Road, travelling south on London Road) – Negligible to Minor Impact
3. Viewpoint 3 (Cycle Lane, approaching Newington Causeway) – Minor Impact
4. Viewpoint 5 (Road, approaching roundabout from New Kent Road) – Minor Impact
5. Viewpoint 7 (Road, approaching roundabout from Newington Butts) – Moderate Impact
6. Viewpoint 8 (Cycle Lane, approaching London Road) – Minor Impact
7. Viewpoint 12 (Road, on roundabout travelling north) – Minor Impact

180. In consideration of the above impacts it is important to note that the impacts identified are based on worst-case scenarios and that following contextual features are likely to result in a lesser effect in reality:

1. Any instances of glare will be broken up by the solid elements of the proposed façade
2. The distance of the viewpoint from the façade, and the oblique view of the proposed façade, would likely reduce any perceived instances of glare
3. Potential instances of glare that occur between 5° and 10° are limited and located at the top of the field of view such that it is considered that the use of the vehicle sun visor would help to mitigate any unwanted instances of glare.

4. The assessment does not take into account the presence of trees, which may help to reduce any potential instances of glare occurring in the sensitive field of vision.

181. In addition, with regard to Viewpoint 7 which would experience the greatest potential impact for solar glare, a glare mitigation strategy has been developed and includes the use of anti-reflective glass for windows located at the lower levels of Block 1B; in order to mitigate the instances of solar glare. It is considered that on the basis of the mitigation strategy being adopted, the likely residual effect to Viewpoint 7 would reduce to Minor Impact.

182. Overall, instances of solar reflection would be of a negligible to minor impact, often short or very short in duration and limited when seen from a moving vehicle while instances of moderate impact would be effectively mitigated through the use of anti-reflective glazing to windows. It is therefore concluded that there will be no significant impacts resulting from the proposed development with regards to solar glare.

Outlook and privacy

183. With regard specifically to preventing harmful overlooking of dwellings, the 2015 Technical Update to the Residential Design Standards SPD 2011 requires developments to achieve:

1. a distance of 12 metres between windows on a highway-fronting elevation and those opposite at existing buildings; and
2. a distance of 21 metres between windows on a rear elevation and those opposite at existing buildings.

184. The image below shows the breakdown of the surrounding buildings. This shows that the majority of the adjacent structures are mixed use properties comprising office and retail buildings and some residential buildings.



Image 17: Use classes of surrounding buildings

185. The proposed development would maintain or exceed the minimum distances as set out in the SPD, exceeding the 12m and 21m requirements between the development and surrounding existing residential properties. It is also noted that the design of the proposed PBSA building has evolved during the course of the pre-app and application process to limit and reduce the number of north facing rooms and incorporate oriel windows with constrained views to the east and west, away from residential properties to the north.

186. Overall, it is considered that any increased overlooking or loss of privacy as a result of the proposed development would be minimal. The proposed development would therefore have an acceptable impact upon the living conditions of the adjacent properties with regards privacy and overlooking.

Noise

187. The NPPF in paragraph 180 seeks to prevent new development from being adversely affected by unacceptable levels of noise pollution. London Plan policy D13 on the Agent of Change puts responsibility for mitigating impacts from existing noise generating activities on the proposed new noise-sensitive development. Policy D14 looks to manage noise by mitigating and minimising the adverse impacts of noise on new development. Southwark Plan policy P66 requires development to avoid significant adverse impacts on health and quality of life, mitigate any adverse impacts caused by noise, and mitigate and manage noise by separating noise sensitive development from major noise sources (by distances, screening or internal layouts, in preference to sound insulation).

188. The site is affected by road noise and noise from nearby businesses including the Ministry of Sound (MoS). Chapter 8 of the ES considers noise and vibration as one of its topic chapters. Noise and vibration in relation to this section falls into two related categories:

    1. potential noise and vibration impacts from demolition, construction, and operation of the proposed development
    2. suitability of the site for residential development

189. An environmental noise and vibration survey was undertaken at a number of locations consisting of three long term noise monitoring positions, three attended short term noise measurement locations and several short term attended vibration monitoring locations.

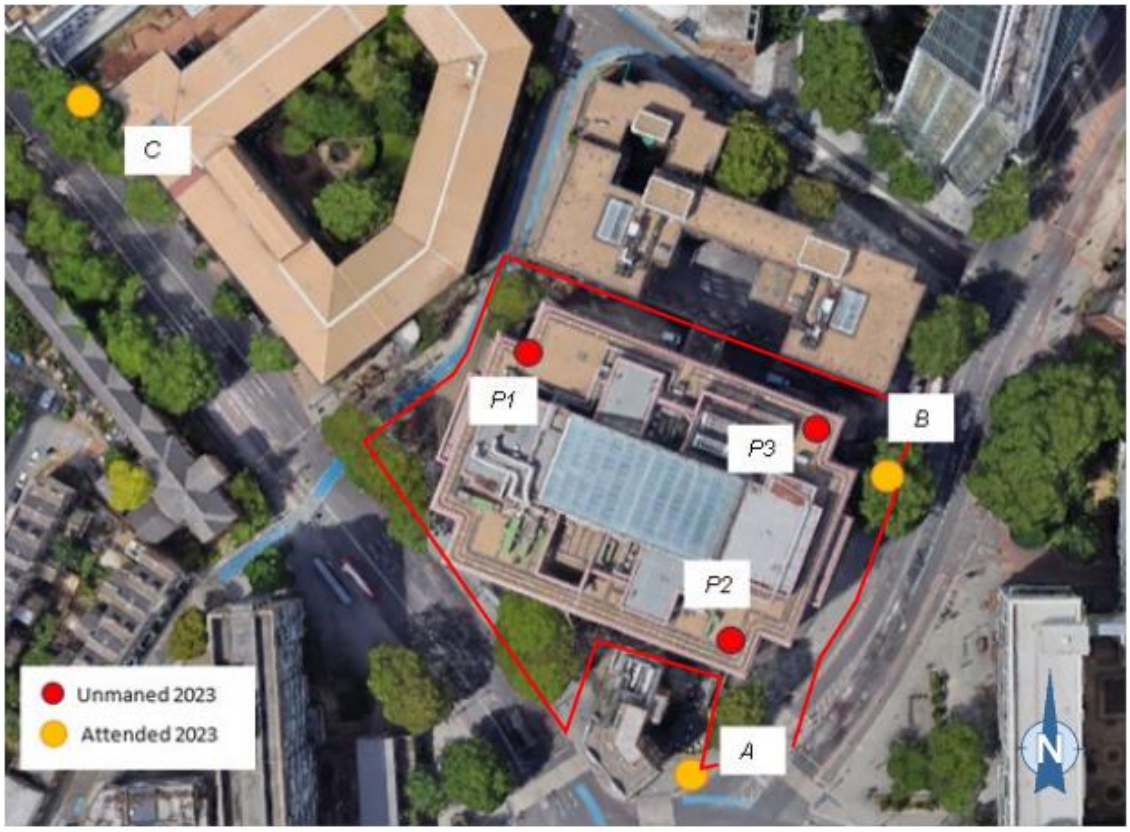


Image 18: Aerial Image of the Site showing noise survey monitoring locations

190. Levels of tactile vibration from London Underground trains is usually secondary to the effects of re-radiated ground borne noise (GBN). As the proposed residential floors start at the second floor, based upon the results of the vibration assessment, the re-radiated GBN levels would comfortably achieve acceptable criteria. While vibration from demolition and construction activities is not expected to cause significant noise effects at any of the receptors.

191. As expected on a site surrounded by arterial roads and a railway viaduct, ambient noise levels are high at about 67-71dB $L_{Aeq,\ 16hr}$ and 57-60dB $L_{Aeq,\ 8hr}$ for daytime and night time levels respectively. Usually for development sites, noise from roads, rail and even aircraft dictate the sound insulation needed for dwellings to provide suitable internal sound levels for sleeping and resting; for large parts of

this site, the controlling factor is break out noise from the Ministry of Sound night club. With the level of sound insulation recommended to deal with noise from MoS, noise from environmental sources would be sufficiently mitigated to ensure that the internal resting and sleeping levels in the dwellings proposed.

Agent of change

192. Policy D13 Agent of Change of the London Plan places the responsibility for mitigating impacts from existing noise and other nuisance generating activities or uses on the new noise sensitive development and says that development should be designed to ensure that established noise and other nuisance generating activities remain viable and can continue to grow without unreasonable restrictions being placed on them.

193. The NPPF (paragraph 200) says that existing businesses should not have unreasonable restrictions placed on them as a result of development permitted after they were established, and where a significant adverse impact on new development from existing businesses could occur, the applicant should be required to provide suitable mitigation before the development has been completed.

194. The main business that could be affected by this development with respect to the agent of change would be the MOS night club which is located approximately 100m to the east of the Site and is an internationally renowned cultural venue and has been operating on Gaunt Street since 1991. During that time, the area has seen significant change, including the introduction of housing close to the club. While the club has a well-insulated dance area, the roof of the bar area is lightweight and there is significant break out noise from this part of the premises. While the initial noise survey included noise from MoS, it was agreed during the application process to conduct a further, more bespoke measurement of break out noise form the club. The council engaged a specialist acoustic consultant to advise on noise matters - RBA Acoustics. They, along with Quantum, working for the applicant and Suono, working for MoS agreed a measurement methodology to supplement the information already gathered; the supplemental survey was conducted in July 2025.

195. Audio tracks were 3-minutes long and consisted of three 1-minute excepts from sonically different music tracks typical of the range of music which Suono advise are commonly played at maximum sound levels in MoS. These excerpts were played at as close to the typical maximum sound levels through the MoS sound systems in each of the key rooms inside MoS: The Box, 103 and The Loft. A similar 3-minute loop was also be played in the courtyard and again played at as close to the typical maximum sound levels through the courtyard sound system. The dominant source of music noise breakout was identified as being noise from the MoS Courtyard sound system. At Skipton House the noise climate was dominated by traffic/urban noise, although some music noise from the MoS Courtyard was audible at Skipton House externally. It is noted that noise from inside MoS was inaudible, at the time of the survey and that all parties agreed that music noise from inside MoS did not warrant assessing.

196. The findings of the additional noise testing are summarised below:

1. The predicted worst-case internal music noise levels are 21 dB LAeq and 24 dB $L_{max,slow}$. These levels are significantly below the proposed internal noise level design criteria for the scheme based on BS8233:2014 (35 dB L_{Aeq} during the daytime and 30 dB L_{Aeq} and 45 dB $L_{Amax, fast}$ at night) and accordingly are likely to be significantly below the ambient noise levels. This is substantiated by the observations during the joint noise survey that music noise levels from MoS, including the Courtyard, were significantly below the existing ambient noise levels at Skipton House.
2. The predicted worst-case internal music noise levels do not exceed a Noise Rating level of NR15, which is generally agreed to be a very low noise level that is unlikely to cause complaints.
3. These assumed maximum figures are worst case levels (dictated by noise from the MoS courtyard) at the worst-case receptor locations. Lower noise levels would normally be expected at most receptors most of the time.
4. It has been demonstrated that music noise breakout from the Ministry of Sound will be acceptable inside the proposed dwellings.
5. The likelihood of adverse impacts from music noise breakout from inside the Ministry of Sound is considered to be negligible with suitable mitigation in place. Noise from the Ministry of Sound should therefore not be considered a constraint on the development and Agent of Change considerations have been achieved with no risk to the future operation of the Ministry of Sound as a result of this proposed development.

197. Overall, a comprehensive assessment of noise from the club has informed a façade design condition to meet an established internal sound level within dwellings, sufficient to protect the MOS nightclub from unreasonable restrictions on their operation. This has been agreed by Southwark Council, MOS and the Applicant and will be included as part of any planning permission.

Impacts on neighbours

Construction and demolition

198. During demolition and construction there are anticipated to be increases in airborne noise and vibration levels as a result of the proposed works. The ES notes that the most significant impacts would be associated with noise and road traffic during demolition and construction, primarily to London South Bank University, University of Arts London and Keyworth Hostel.

199. The development would be required to comply with Southwark's Technical Guidance for Demolition and Construction which would require noise and vibration levels to be below a level at which they would be classed as not significant for a temporary period. This would be secured through a Demolition and Construction Environmental Management Plan. This would also cover construction traffic.

200. Notwithstanding, the ES includes a range of construction and demolition mitigation measures for noise, vibration and traffic such as:

1. Use of low-noise emission machinery, such as electric or low-noise diesel-powered equipment, and retrofitting noise controls where necessary.

2. Using acoustic screening, such as temporary barriers or sound insulation to shield particularly noisy equipment.
3. Alternative construction methodologies, such as using quieter methods for piling (e.g., hydraulic or rotary methods) instead of traditional impact piling.
4. Managing administrative controls, including setting strict working hours (e.g., Monday to Friday, 08:00 to 18:00, and Saturday 09:00 to 14:00).
5. Conducting noise monitoring in accordance with BS 5228-1, with immediate corrective action taken if noise limits are exceeded.
6. Ensuring all plant and equipment are well-maintained and fitted with silencers where applicable.
7. Using broadband reversing alarms on-site vehicles to reduce noise.
8. No idling vehicles.

201. The associated impacts from construction and demolition are predicted on a worst-case scenario and without mitigation; they would be of a short to medium duration. Some impact from development can be expected but it can be suitable managed for that impact to be minimised through the recommended mitigation measures and contractors adhering to any approved demolition and construction management plan. These would be secured through condition/planning obligation and subject to review by the Council's Environmental Protection Team who regulate noise and vibration from construction.

Noise from plant and commercial operations

202. Plant (power, heating and cooling machinery) would be contained within several rooms located in the basement level of the proposed development. An assessment of background sound levels was undertaken which showed that measured night time background sound levels at various receptors were between 39dB – 42dB, L_{A90} across the site. While detailed plant design has not been completed, the Rating Noise Level from plant will be expected to be 10dB below the background to ensure there would be no impact on existing receptors and within the development itself. A condition is recommended to this effect which means that there would be no change and a negligible impact effect from plant noise.

People noise and disturbance

203. It is noted that some of the objections received, mention the potential impact from the increased number of people on the site. While there would be more activity from people and increased commercial activity, the Applicant's Noise Assessment notes high background noise levels principally associated with local traffic which is the dominant noise source at the site. In addition, the Student Management Plan submitted with the Application references that the operator would maintain continual presence on site to work with the public and students to make sure there is harmonious co-existence. Through the legal agreement, a more substantive management plan would be required for approval, detailing how the student accommodation would be managed to limit impact on neighbours, the code of conduct students would need to adhere to, how neighbours can complain if they are disturbed and what action would be taken.

Keyworth Hostel

204. It is noted that some objections have raised concern regarding the impacts to Keyworth Hostel. Chapter 8 of the ES has considered potential noise and vibration impacts to Keyworth Hostel as well as impacts on the proposed development as part of their broader assessment. Overall, given that the windows of the hostel are oriented away from the Proposed Development, the hostel is screened off by the Perry Library, providing a natural buffer zone and that the hostel does not have any external amenity areas, which minimises the likelihood of outdoor noise disturbances, such as social gatherings or recreational activities; it is unlikely that significant impacts will arise.

Public Realm

205. London Plan Policy D8 states that development proposals should encourage and explore opportunities to create new public realm where appropriate and ensure the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain. Landscape treatment, planting, street furniture and surface materials should be of good quality, fit-for-purpose, durable and sustainable.

206. SP Policy P13 (Design of places) requires proposals to ensure buildings and spaces are well-positioned for their function and use. High-quality public realms that encourage walking, cycling, and are safe and attractive are essential, along with appropriate landscaping and green infrastructure. The policy also mandates inclusive design accessible to all ages and disabilities, formal and informal play opportunities, and adequate outdoor seating.

207. The proposed development includes a comprehensive package of public realm enhancements which have been designed to address all public visible frontages, improve pedestrian movements, encourage social interaction and enhance the overall aesthetic and functionality of the site. One of the key elements is the creation of “Skipton Circus”, which is new circular public realm space to London Road, situated between Blocks A and B. The design intent is to provide a safe pedestrian environment away from vehicular traffic and includes a broad open space with landscaping areas seating and play features. At the centre of Skipton Circus is a community square which has been designed to accommodate a range of temporary and informal uses, including lunchtime gatherings, pop-up markets, street performances, and community events. A raised circular light is proposed above the space to enable safe and functional use of the space during the evening and throughout the year. The central location of the space, with pedestrian routes to both London Road and Newington Causeway are designed to be support flexible use and contribute positively to the wider public realm and community infrastructure.



Image 19: Plan showing extent of proposed public realm and landscaping works



Image 20: Illustration of proposed public realm and creation of 'Skipton Circus'

208. The public realm works extend to Ontario Street which is currently hindered by bins at the junction with London Road as well as an existing vehicle turning head which restrict pedestrian movements. The existing turning head is proposed to be resurfaced to remove level change across the street with access restricted to pedestrians, cyclists and service vehicles (at the north of Ontario Street). The existing Cycle Super Highway (CS7) and cycle docking station would be retained however, the existing blue lane markings would be replaced with stone paving to match the adjacent footpaths. The route would be delineated by the smaller sett of the paving which is intended to highlight that the use of the space is shared with pedestrians. The new public realm includes tree planting and seating which run linear to the CS7 route to further highlight the shared nature of the space and

avoid user conflict. A new east – west pedestrian connection is proposed to the north which would integrate the space with the broader public realm and improve pedestrian navigation though the site and between transport points.

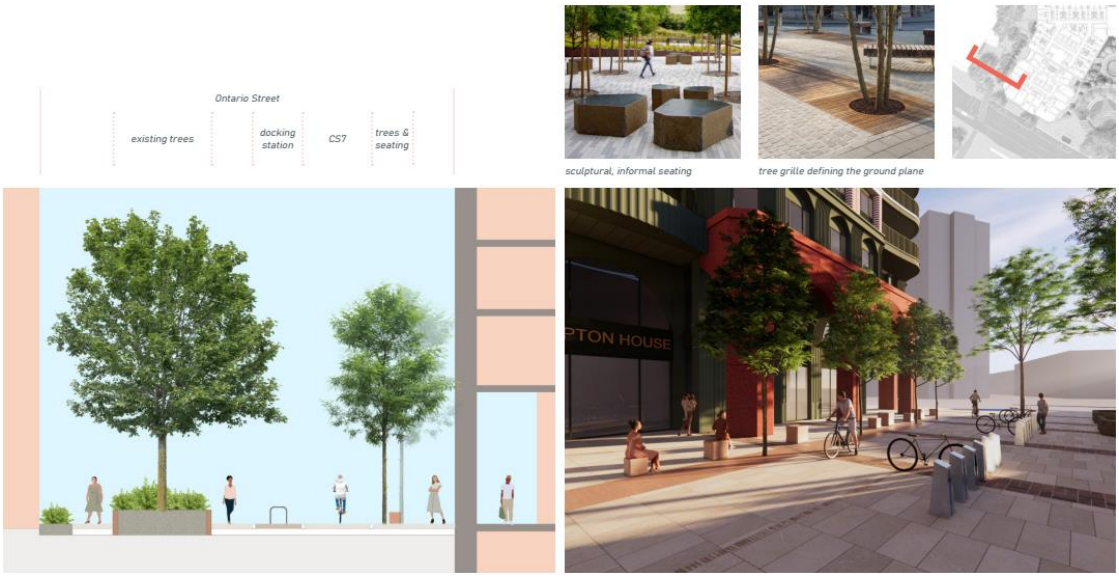


Image 21: Illustration of proposed public realm and landscaping works to Ontario Street

209. Finally, public realm works are proposed to Newington Causeway which include a covered colonnade to create a sheltered walkway and entrances to the residential lobbies along this frontage. A substantial landscaped buffer, featuring tree planting, separates the colonnade from the adjacent highway, offering visual screening and environmental comfort. In addition, stepping and acoustic features are proposed to be integrated into this space to create a more enjoyable and engaging public realm experience, connecting the building entrances to pedestrian routes north and south along Newington Causeway.



Image 22: Illustration of proposed public realm and landscaping works to Newington Causeway

210. In total, the Proposed Development will deliver 2,451sqm of publicly accessible space. This will provide a high quality, well-connected, green place which promotes pedestrian movement, a sense of safety and security and a much-

improved sense of place to the area in accordance with LP Policy D8 and SP Policy P13.

Children's play space

211. London Plan Policy S4 (Play and informal recreation) requires developments to enhance play opportunities and independent mobility for children, ensuring residential developments provide at least 10 square metres of good-quality, accessible play space per child. Play space should be stimulating, safe, integrated into the neighbourhood, incorporate greenery, be under passive surveillance, and not segregated by tenure.

212. The proposed development includes the provision of 1,103 sqm of children's play space located at the ground floor along Newington Causeway, at Podium level within the centre of the site and at Level 23 and Level 25 with the proposed residential terraces. The ground floor play provides a stepping and acoustic sensory play trail which is intended to create opportunities to interact with the landscape elements as people pass through the site. A sculptural play structure is proposed in the centre of the podium garden which provides hanging seats, robe climbing and lawn to foster opportunities for structured and unstructured play activity. The residential terraces have been designed to be open and to promote more active and adventurous play environments. They include a structure that wraps around the terraces to provide opportunities for climb, swing, slide, hide and exploration as well as providing places to sit in groups away from the play areas. The areas of play space feature a variety of equipment for children of all ages to and offers a range of experiences for calm or adventures children.

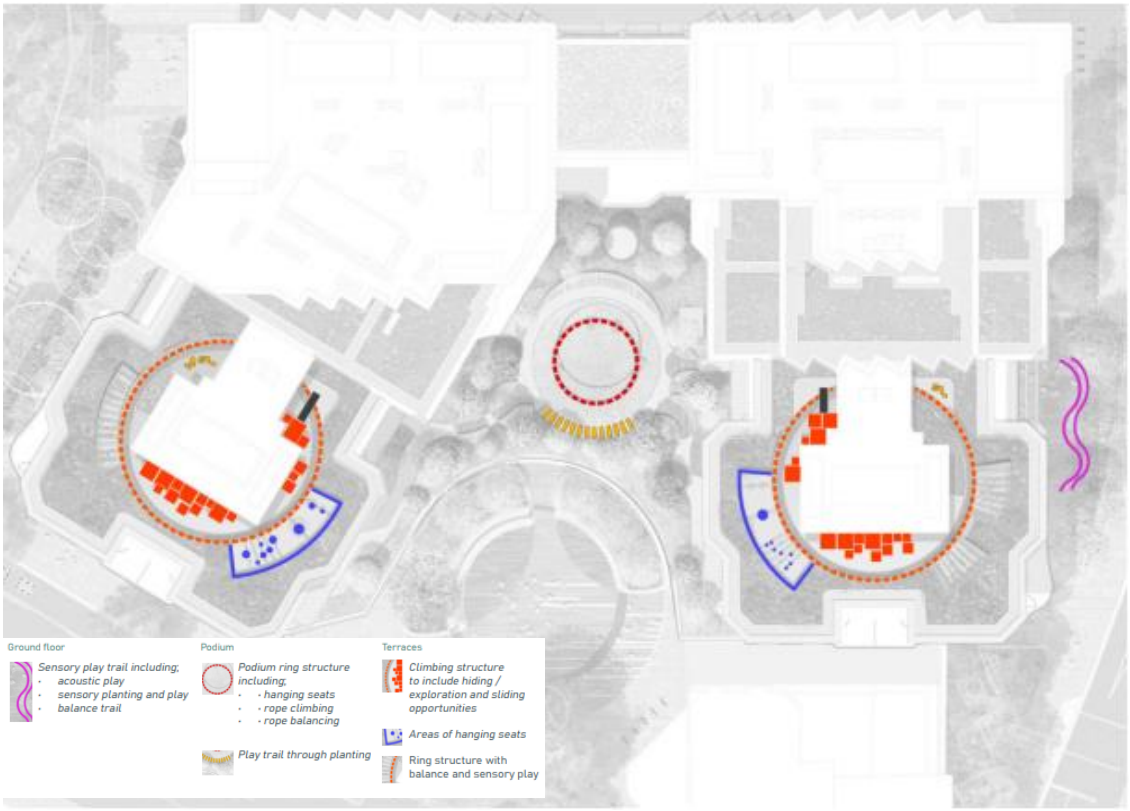


Image 23: Location of play space, landscaping and public realm works

213. The provision of play space is located at Podium level and within the residential terraces which are secure areas and will be well-lit and overlooked, and will feature a range of seating areas for parents and carers. The details of the play space will be secured by condition to ensure the aspirations illustrated below are delivered. As such, it is considered that the play space is appropriate for the site and will ensure that families are able to access this space safely and children able to enjoy a high quality and imaginative space.



Image 24: Visual representation of proposed play space

214. Due the nature and size of the proposed development, and the provision of other play areas within suitable walking distance of the site, it is proposed that 822 sqm of 0-4 years play and 281sqm of 5-11 years play be delivered on site. Older children's play is proposed to be delivered off-site by way of a financial contribution via a S106 Agreement. The quantum of play space provision is shown in the table below calculated using the GLA Playspace Calculator under LP Policy S4.

Age Group	Policy Requirement (sqm)	GIA (sqm)	Proposed
Ages 0 – 4	821	822	
Ages 5 – 11	637	281	
Ages 12 – 15	302	0	
Ages 16 & 17	159	0	
Total	1919	1103	

Table 3: Play space requirement and provision

215. The diagram below shows the existing play and open spaces in close proximity to the site which offer equipped areas of playing fields/grass areas, sports facilities, community facilities, play areas, walking trails, gardens fitness equipment and water features. Elephant Park, Victory Community Park, St Mary's Churchyard, Newington Gardens, Dickens Fields, Geraldine Mary Harmsworth and Imperial War Museum Grounds are within 800m of the site, approximately 10 minutes walk, and cater for 12+ years. While Tabard Gardens, Salisbury Row Park and Lambeth Walk Open Space are within 1100m of the site, approximately 16 minutes walk and also cater to 12+ years.

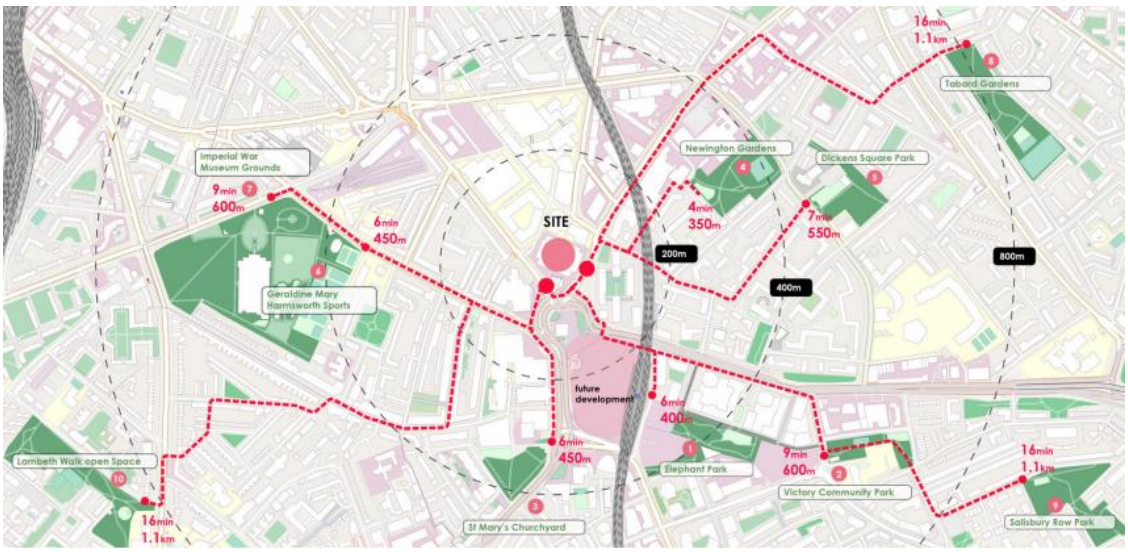


Image 25: Location of play space, landscaping and public realm works

216. Overall, the Proposed Development will provide a policy-compliant level of play space on-site for 0 – 11 years as demonstrated in the Table above, as required under LP Policy S4. While it is noted that there are several play areas, sports facilities and open spaces in the area which cater for 12+ years, a financial contribution towards off-site play space provision for older ages (12 - 17 years) is proposed in order to improve and enhance existing provision in the nearby vicinity as part of meeting the on-site shortfall of 816 sqm.

Urban Design and Heritage

Background and Context

217. The application site comprises a large, stand-alone office building in Elephant and Castle. The building, Skipton House, is located on the northeast corner of the gyratory, sitting immediately behind the Bakerloo Line underground station and at an angle to the junction of London Road with Newington Causeway.

218. The 7-storey building features deep floorplates and a large central atrium, providing c.16,000 sqm of office floorspace. Built in the early 1990s for a bank, the building was eventually occupied by the Department of Health until 2022, since when it has become vacant and its interior soft stripped. The architecture is derivative post-modern, with a more sober character. The outside retains its orderly grided elevations in red and pink sandstone, floor-to-ceiling tinted windows, with the final floor expressed as a glazed loggia with precast columns. A curved glass roof above the atrium gives the building a distinctive roof profile when viewed from Newington Butts.

219. The main entrance is positioned within a fully glazed central bay, subdividing the composition into two parts, with the entrance accessed from a triangular-shaped plaza created by offsetting the building from the adjacent station and London Road. A secondary entrance at the rear bridges a basement servicing ramp, and leads to a small courtyard space shared with neighbouring Perry Library and Keyworth Hostel that face onto Keyworth Street. The building flanks onto Newington Causeway and Ontario Street. The building's scale and offset

position mirror the Brutalist housing block, Perronet House that angles towards London Road, and is similar to Block A of Metrocentral Heights, opposite onto Newington Causeway.

220. Skipton House is one of many large-scale buildings that form the townscape of Elephant and Castle's town centre. Largely characterised by its postwar comprehensive redevelopment, the centre is again undergoing a period of extensive urban renewal, with the demolition and replacement of its late 1950s shopping centre and the development of residential towers that, together with Strata Tower, No1 the Elephant, Highpoint, Eileen House (2-50-1) and Kite House, cluster along its central arterial roads. This will shortly extend to the replacement of the University of Arts London's complex of postwar buildings with further high-rise residential towers. The high-rise buildings of the Elephant Park sit close-by, just south of the railway viaduct, as a modern extension to the town centre.

221. Little of the historic environment survives at its core, with the Grade II listed Metropolitan Tabernacle, locally listed underground station, the locally listed railway viaduct and the open space of former St Mary's churchyard as remnants of the mid-Victorian and Edwardian periods, while the striking Faraday Memorial and Goldfinger's Metrocentral Heights provide notable postwar Grade II listed buildings. Nonetheless, the centre's modern townscape quickly transitions into a context of traditional terraced streets, and early 20th century walk-up estates set in landscape. Many of the streets to the north and northwest are designated as conservation areas, with those of the nearby West Square and St George's Circus conservation area particularly notable for their Grade II listed Georgian terraces.

Demolition

222. The proposed development requires full demolition, resulting in the complete loss of the building above grade. While the post-modern period is undergoing some retrospection, designed by Auckett Architects at the end of the period, the building is of no strong architectural or townscape interest other than for its high-quality stone finish and distinctive glazed roof profile. The latter offers some relief to its horizontality and is notable in the view along Newington Butts. However, the building's offset alignment and wide, bulky presence behind the attractive Edwardian underground station and hi-tech, sculptural Faraday Memorial provide an unsatisfactory response to the local vista. In addition, its stand-alone character and solitary main entrance onto a vestige open space generates a disengaged and underwhelming urban quality, especially with the building doing nothing to activate its substantial flank facades onto Newington Causeway and Ontario Street.

223. The building is not considered a non-designated heritage asset and is not within a designated conservation area, and as such its demolition and replacement with a building of improved architecture and urban design quality is welcome.

Layout

224. The development proposes a complex of buildings, comprising a large podium structure with four towers above that are arranged in two pairs with a low-rise linking block in-between. The complex has a broadly C-shape layout that opens towards London Road, with the stems slightly cranked to align with Ontario Street and Newington Causeway, with the latter stem following the general building line of the underground station building. The C-shape encompasses a new public open space, which is arranged in an elliptical form and hard landscaped with retained and new trees and tiered planters to form a plaza (referred to as Skipton Circus).

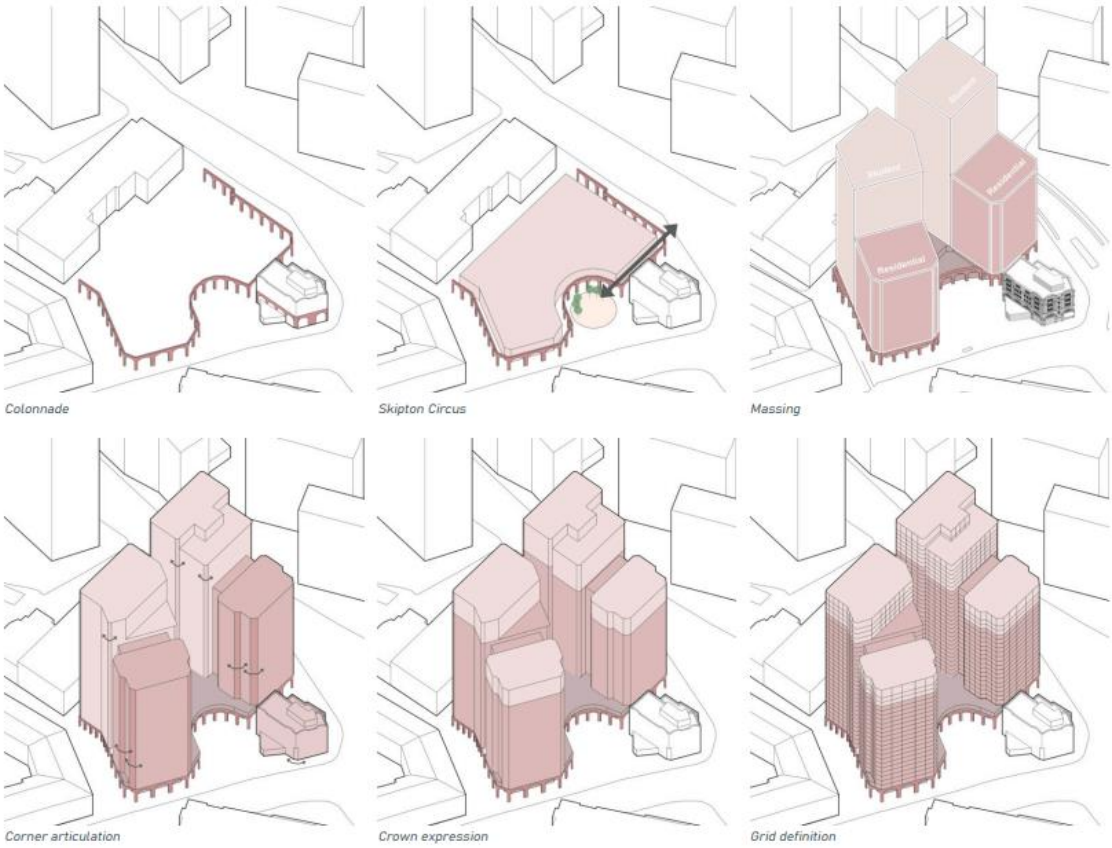


Image 26: Illustration showing design and massing strategy

225. The podium provides new commercial floorspace and a large, double-height student reception/ foyer with communal student amenities (library, co-working, café), as well as accommodating significant back-of-house facilities and services for the new residential and student accommodation (e.g., plant, storage, emergency exit routes). The podium features a double-height colonnade that lines the new plaza and frontages onto London Road and Newington Causeway, providing a sheltered public walkway that connects the two main roads, adding permeability to the site. It also features rooftop gardens, framed by the new towers, providing c.160 sqm of outdoor communal amenity space for the new residents, as well as a high-level landscaped fringe to the plaza. The students have access to the link block at the rear of the podium, which contains further amenity rooms (gym, yoga studio and dining facilities) with access to terraces and balconies that overlook the podium gardens.

226. Further direct entrances to the student accommodation are provided onto Ontario Street and Newington Causeway, which also link through to the central reception foyer. The residential entrances are likewise located on Ontario Street and Newington Causeway and benefit from double-height entrance foyers. The extensive residential and student accommodation is provided in the high-rise blocks, arranged in two pairs of back-to-back towers, with the residential accommodation located in the southern two towers (1b and 2b) towards London Road and the gyratory, and the student accommodation located in the adjacent northern two towers (1a and 2a) towards the neighbouring library and hostel on Keyworth Street. Each pair of residential and student tower share a party wall, but are designed to read as individual towers, each with separate street entrances.

227. In terms of the urban design response, the layout is well conceived, swapping out an existing stand-alone, large building and vestige public open space for a development with a strong sense of place. It provides a high-density built form that responds well to the alignments of the adjacent streets, and delivers a sizeable and meaningful plaza space, framed by the new buildings and orientated to make the most of a south-westerly aspect. The new plaza offers an attractive, coherent public space and entranceway to the development and adjacent underground station.

228. The layout may not re-establish Skipton Street as a north-south route through the site (see previous consent), but it does provide a direct pedestrian connection between London Road and Newington Causeway that both eases local pedestrian congestion and provides an attractive, colonnaded route that animates the edges of the new plaza. The colonnade is not typical of the area, but does offer a potentially attractive element of covered public realm that will add to the sense of place. Its detailing, management and sense of public security will be important, although much of its success will depend on its activation (see later).

229. The ground floor plane is engaging, with commercial uses that front onto the colonnade and new plaza and briefly return onto Newington Causeway and Ontario Street, before giving way to the double-height residential entrance and adjacent student entrance that will ensure the adjacent streets are well-activated. The main student reception is positioned central to the colonnade, providing a busy, focal point to the scheme. With the station opening onto the central space, the plaza will be well-used, providing good informal surveillance. The servicing is sensibly orchestrated towards the rear, making use of the less congested part of the site and the existing servicing ramp.

230. Regarding the urban form at street level, the development is coarsely grained, with the podium forming a singular built form across the site. That said, the town centre is characterised by the large-scale formats of its postwar and modern-day buildings, while the curvilinear shape of the podium and its activated colonnade do much to relieve this sense of coarseness. Importantly, the podium’s alignment onto Ontario Street and Newington Causeway does well to bring a coherency to the adjacent streetscapes, with the development notably supporting the façade line of the underground station building and creating a more satisfactory urban form.

231. Overall, the scheme should make for a high quality of urban design in terms of its general layout at street level that should make for an engaging urban form, with good activation, an attractive public plaza and a strong sense of place. As such, the scheme generally accords with policy P13, parts 3-5.

Scale (height and massing)

232. The proposed built form will cover approximately two-thirds of the application site, with the podium base comprising three main storeys, measuring c.12m above grade to the front. As referenced earlier, above the podium the development comprises four high-rise blocks, arranged in two conjoined towers and a low-rise linking block that cradle the podium's rooftop gardens. The towers sit on the outer edges of the podium, with the arches of the colonnade grounding the residential towers (1b and 2b) to the front and the student tower (2a) onto Newington Causeway.

233. The towers are of different heights, with the residential towers effectively rising to 22 and 24 storeys (c.73m and 79m) and the student towers rising to 30 storeys and 31 storeys (c. 95m and 98m) above grade (incl. podium). The heights are arranged in a spiral, rising clockwise from the southeast corner (2b) adjacent to the station, up to the student tower (2a) onto Newington Causeway; the intention being to provide an engaging skyline profile that avoids impacting on strategic views and responds to the town centre's varied townscape context.

234. Regarding their floorplates, the residential towers are reasonably compact for their building type, measuring c.30m wide and 25m deep. The student towers are larger, building 2a adopting a squarer footprint of 30m by 30m that briefly widens to 33m towards the rear. Building 1a is cranked, with a more irregular footprint that generally measures 30m wide, but is 21m deep on its west flank and 38m on its east.

235. An important aspect of the development is the pairings of the residential and student towers. The back-to-back arrangement provides an efficient built form, both in terms of construction and optimising habitable floorspace. However, this generates a notably broad massing above the podium, with towers 1a and 1b combining to present a 46m wide built form onto Ontario Street; and towers 2a and 2b combining to present a 55m wide built form onto Newington Causeway. As such, the development is distinctly bulky in its massing for its height. This is particularly evident when viewed from the gyratory, where the cranked form of building 1a and splayed layout of the west stem (buildings 1a and 2a) result in an unbroken built form that reaches some 65m in breadth. While substantial, the folded form and oblique view ease the sense of scale.

236. Currently, this extent of height and bulk would be singular within the town centre, which is generally characterised by moderately tall slab blocks and slender towers. Metrocentral Heights #A and Perronet House, opposite, are longer at 65m and 78m respectively, but notably shallower in depth at c.13m as slab blocks, and lower in height at 8 and 11 storeys (27m and 36m).

237. However, the wider context is changing. The new UAL building (E1) is nearing completion on the southside of the gyratory and runs some 73m along New

Kent Road, before cranking for an additional 22m. With a triangular footprint and 11 office storeys (c.53m), it will make for a substantial built form, diagonally opposite the application site. As such, while the proposed built form is tall and bulky, it will not appear notably out of character with the emerging context within the heart of the town centre.

238. Furthermore, the proposed designs are highly articulated in terms of height and detailed architecture, which work together not only to bring visual interest, but also to relieve the bulkiness and avoid an overwhelming sense of scale. The staggered and cascading arrangement of the different tower heights helps to reduce the visual bulk of the development, as well as suggesting a more contextual response, with the built form seen to step down from Elieen House towards the gyratory. This transitioning of heights brings different perspectives to the development when viewed from the surrounding streets, supporting the sense of an ensemble of tall buildings rather than a single built form.

239. This character is further enhanced by the modulation of the facades and different elevational treatments of the buildings. Deep recesses are introduced between the front facades of the student and housing blocks, creating deep shadow gaps that emphasize the verticality of the two abutting buildings. The changes in detailed architecture add to the effect: The use of setbacks, balconies and chamfered corners, different window grids and sizes of openings, and contrasting colour tones and material textures work well to bring out a visual distinction between the two buildings and allow them to read as two discrete, slender built forms. The visual effect diminishes to an extent at nighttime, when the finer detailing is less apparent. However, the different floor alignments and window grids between the student and housing will be apparent with the internal illumination, and will remain sufficient.

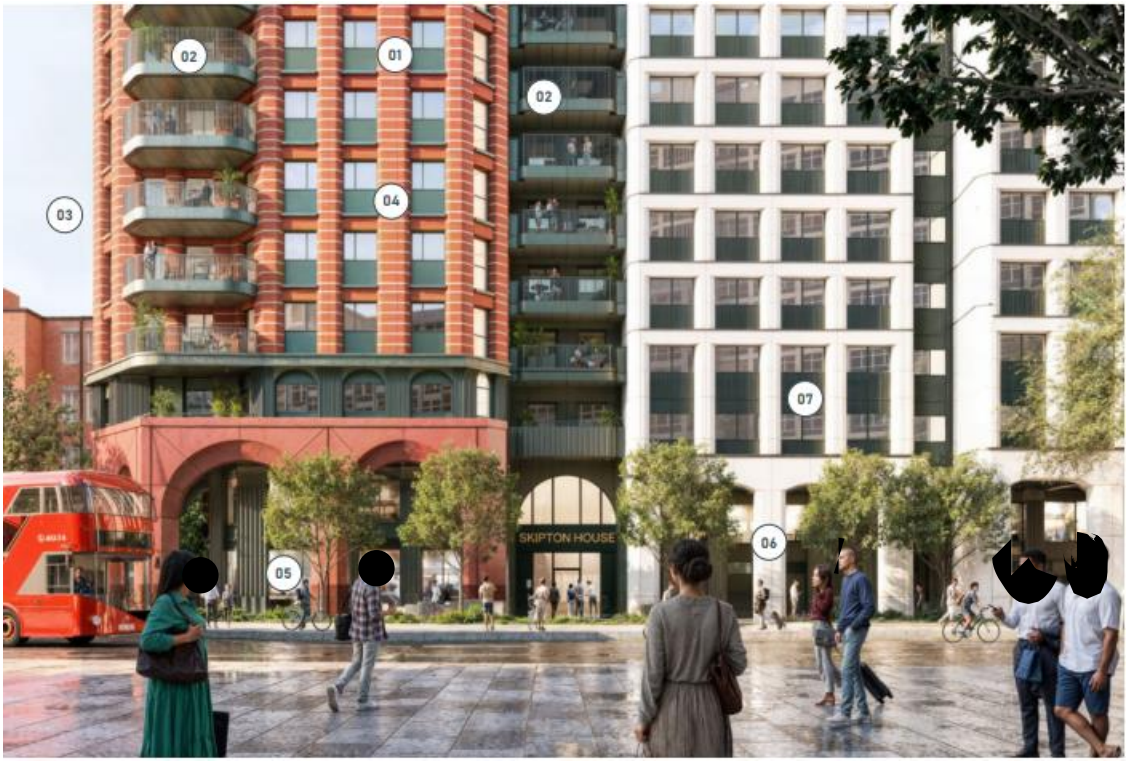


Image 27: illustration of façade detailing and treatment of affordable building (left) and student building (right)

240. The development's scale is further relieved by the strong articulation of the podium base, with its fluid form and distinctive colonnade design. It brings a human scale to the development, the podium's double-height arches referencing the tall arches of the adjacent underground station, with the polished red precast adding a familiar colour tone. At three tall storeys, the podium's height draws through the development a more moderate and relatable height datum, picking up on the modest-rise buildings within the local context that include the Elephant and Castle public house, Bakerloo Line Station, neighbouring Southbank University building on London Road and the housing estate opposite, as well as the converted former garage block of Perronet House and the general townscape of Newington Butts (northside) opposite. The outcome is effective, with a strong sense of a more moderate datum apparent in the submitted views, drawing this 'lower order' townscape together.



Image 28: Illustration of base design of Skipton Circus

241. Lastly, the treatment of the tops of the towers introduces a visual hierarchy to each of the towers that not only provides a 'crown' to each building, but works well proportionally, helping to alleviate their sense of scale.



Image 29: Illustration of crown design of the residential buildings

242. Overall, the proposed built form is considerable, replacing a stand-along office building in a town centre location with a development of significant height and bulk. While the urban intensity of the scheme is high, the designs are well-articulated and effective, creating an engaging podium building and composition of tall buildings, with sufficient visual relief, minimising its sense of bulk. Its detailed scale and arrangement respond sufficiently well with its local context, satisfying policy P.13, part 1. A key feature of this is the quality of the architecture.

Detailed architecture

243. The proposals are the outcome of an extensive design-led process that has worked through the detailed heights of the tall buildings in response to strategic and important townscape views (see later) and with an emphasis on achieving a high quality of design. Key elements of this have been the strengthening of its functional quality and architectural language, with a notable focus on achieving a clearer expression of the towers. Overall, the process has been effective, with the proposals achieving a good design balance and a high quality of architecture.
As referenced above, the designs are for a public-facing podium building, topped by four towers set out in two pairs, and arranged in a broadly C-shaped form, with a low-rise linking block between the two pairs. The three-storey podium contains commercial floorspace and main student amenities to the front, with the residential and student cores and services towards the flanks and rear.

The podium features a double-height colonnade that fronts onto a central plaza and wraps onto the flanks.

244. The colonnade comprises for the main part polished red precast stone with a vaulted ceiling in a contrasting green finish that provides an attractive arcade and engaging frontage to the development. The arched design and masonry finish co-ordinate with the architecture of the adjacent underground station building, making for a coherent streetscape. Below the student blocks, the colonnade remains double-height, but switches to a white polished precast finish and a more cambered arch profile.



Image 30: Illustrations of colonnade and archways at ground level along Skipton Circus

245. Above the colonnade, the podium's façade sets back and is finished in curtain walling with green PPC metalwork window frames and decorative panelling. Its pavilion-style appearance completes the podium form and visually separates the base from the towers above.

246. The podium designs are attractive, with a robust and elegant character, although it is important that this design intention and material quality are carried through to the final detailing and as such, this will be secured by way of condition. This will include the floor finishes and lighting, as well as security equipment and management of the arcade space. The proposals include gating the colonnade onto the rear of the station for security. It is important that the shopfronts are complementary in their designs, and that any signage or commercial use of the space (e.g., tables and chairs) do not cause undue clutter. However, it is noted that this could be addressed through an appropriate shopfront strategy.

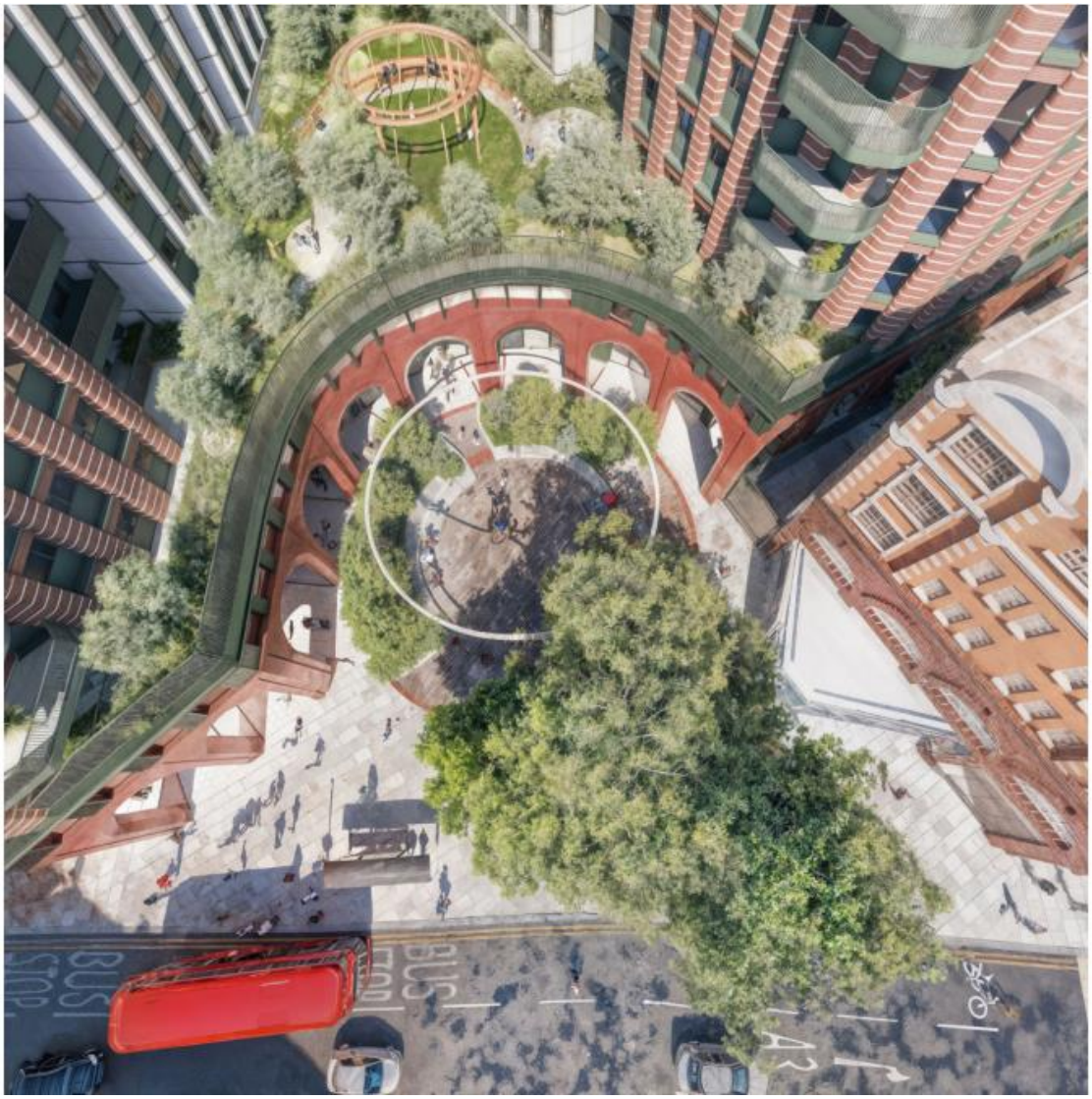


Image 31: Aerial illustration of Skipton Circus and podium level.

247. The functional quality of the podium building is high, featuring good-sized commercial floorspace with flexible space over several floors, and access to shared servicing at the rear. The end units are dual-fronted, with access shown onto both the plaza space and adjacent side streets, which is welcome in activating the public realm in-the-round. Servicing and plant (incl. storage) are positioned towards the rear of the podium at ground and basement levels, with access to an off-street servicing bay and servicing ramp to basement level.

248. The student reception foyer and main amenity space sit at the centre of the podium and feature a triple-height atrium that opens onto a mix of co-working, library, café and other amenity spaces over the three levels, top-lit by a large skylight that sits within the rooftop gardens above. Illustrations show the atrium space attractively finished in timber, bringing a warmth to the interior designs, and with a central section of terraced seating/ staircase that provides an informal events area. Further smaller student amenity rooms are located at first floor level onto Ontario Street and Newington Causeway, above the additional student entrances, bringing activation and informal surveillance to the arcade and obscuring the extensive cycle storage areas from view. Lasting, the podium's rooftop gardens are shown well-landscaped, with extensive planting,

including greenery designed to spill over the parapet wall. The communal gardens are for the residents, with access from the adjacent residential cores. Overall, the functional quality of the podium building is high.

249. Regarding the residential towers, the architecture is well-developed, with strongly articulated designs that include chamfered corners with bullnose detailing and deep window reveals, mix of recessed and projecting balconies with curved edges, and expressed floor/cill banding. The modelling softens the built form and lends an appealing residential quality to the scheme. The primary material finish is faience, comprising a blend of mainly red terracotta with white terracotta banding that reference the finishes of the underground station, as does the use of the green PPC anodised metalwork for the balconies, window frames and infill panels. The green metalwork finish is carried through to the residential entrances and double-height foyers onto Ontario Street and Newington Causeway, grounding the towers in a coordinated finish. It is notable that the colonnade briefly pauses for the residential entrances, with the switch from red to white precast and flatter archway design, enhancing the legibility of the entrances within the streetscene.

250. The main body of the building features an orderly grid of residential balcony doors and windows sized differently for bedrooms and livingroom/ kitchens. The grid changes for the final four storeys (incl. rooftop garden enclosure), with slightly wider windows that are gathered into giant order openings and highlighted by a white primary and secondary cornice band detail. The proportion of white terracotta is increased over these final floors, lightening the building’s rooftop finish, expressing a crown.

251. Internally, the functional quality of the housing is generally high, with a maximum of six flats per floor per core and good apartment layouts. All rooms meet the residential standards for size and ceiling heights (2.5m to habitable rooms), while the core placement to the rear helps to optimise useable floorspace. This does, however, limit the number of true dual aspect apartments, although the articulated planform of the building makes up the shortfall with enhanced single aspect apartments and generous 10sqm balconies for all flats, regardless of bedroom numbers. The large foyers, extensive storage facilities, provision of three lifts and access to the communal podium gardens add to the amenity of accommodation.

252. Turning briefly to the student blocks, the architecture contrasts with the residential in its use of white precast stone for its primary material finish and more orderly and regular grid of bedroom windows, with simpler detailing without balconies. Its shares the same green anodised PPC metalwork finish for co-ordination but uses a ribbed profile for the infill panels below the windows to add visual interest and distinction. The strong framework of white piers and spandrels is softened by a slightly rounded profile for the piers and deeply recessed window openings that give light and shadow to the elevations. The colonnade’s columns have a sturdier appearance, with the upper piers slenderer in design. That said, the piers thicken towards the middle, before thinning again towards the top for visual interest. Similarly, the window openings over 2nd and 3rd floors are grouped into a giant order to reinforce the building’s vertical expression at this level and are again grouped over the final series of storeys to express the buildings top. The latter includes a wide parapet with a subtle

folding of its white precast panels to add further light and shadow. Recessed rooftop overruns and cores accessing the roof plant are finished in the same precast for visual coherency.

253. Lastly of note is the inclusion of oriel windows mainly on the north (rear) elevation of the student blocks, and on the final storeys of their south (front) elevations where they sit above the residential blocks. These are profiled to provide daylight and directional views to the student bedrooms, designed for the most part to ease amenity concerns for the neighbouring buildings of Perry Library and Keyworth Hostel and avoid stymying their future redevelopment. Furthermore, they bring welcome visual interest to the central bays of the north elevations when seen above the library and hostel, as well as to the central bays of final 5 and 6 floors of buildings 1a and 2a, respectively, on their south elevations when see from New Kent Road and Newington Butts. The profiled designs are carried through to parapet level, creating a distinctive roof profile and a coordinated design to the two buildings, which is effective.

254. Regarding functionality, the quality of the student accommodation is high, with the students accessing extensive communal facilities within the podium building (see earlier) and a host of additional, smaller amenity rooms located on every other floor; albeit the rooms are windowless, being positioned against the party wall. They nonetheless provide the opportunity for cinema rooms, recording studios, game rooms and prayer rooms. In addition, the students have access to a gym facility and bookable dining rooms within terraced gardens within the link block. The student bedrooms are of a good size and have good internal floor heights of 2.5m, with each floor including two or three-bedroom studios. While the room numbers per floor per core are high (25-30), the corridors are reasonably short and benefit from one or two windows allowing natural daylight. The shortcoming is the general lack of communal outdoor amenity space, albeit the students have access to the plaza and other nearby open space.

255. Lastly, adjustments have been made to the architecture during the application process to address officers' concerns and public consultations (e.g., CAAG). It is notable that the scheme architects responded well to the concerns. The adjustments were matters of architectural refinements rather than to the overall scale but have resulted in a more elegant and coherent design. The changes included lightening the crown and adjusting its proportions; adjusting the detailing and widths of the window openings, balcony designs and ground floor columns; and simplifying the colour palette. The underlying complementary visual contrast between the residential and student towers has been maintained.

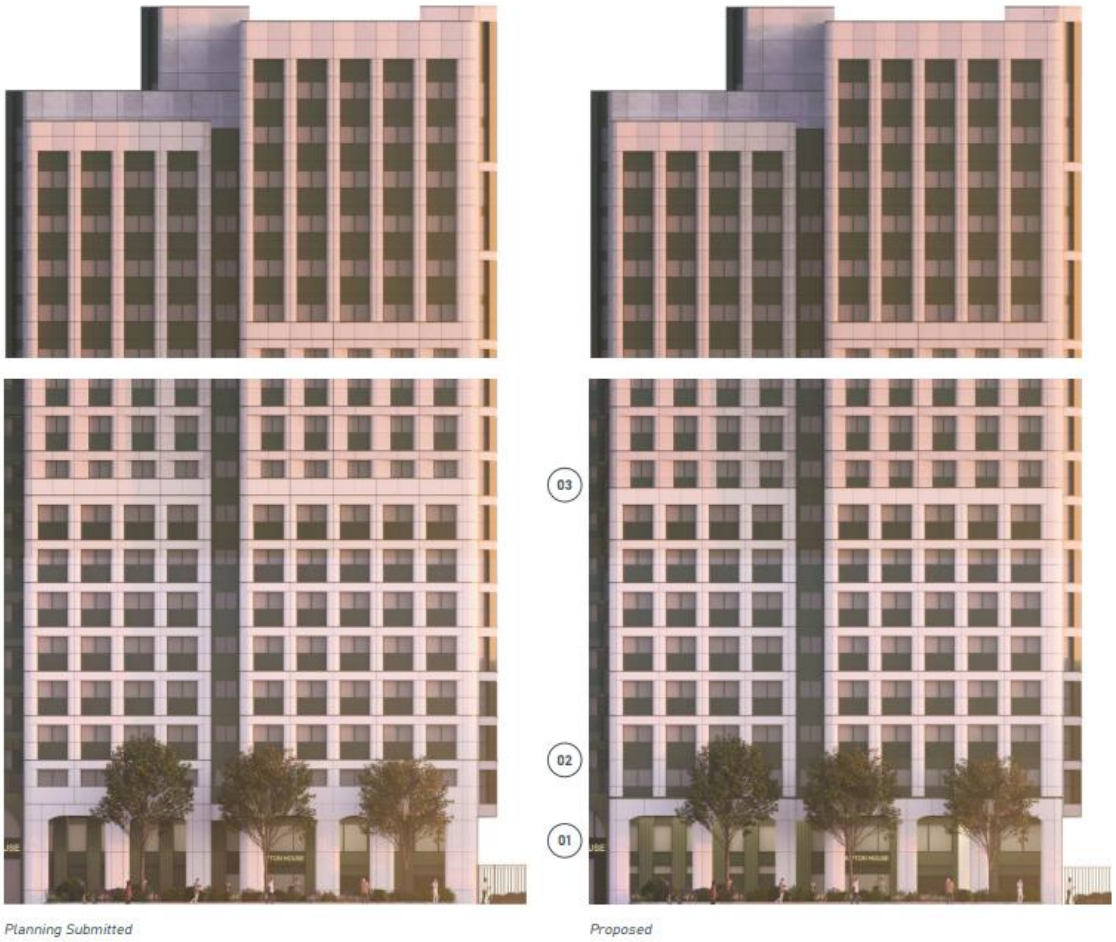


Image 32: Illustration of changes to architectural refinement of the student buildings

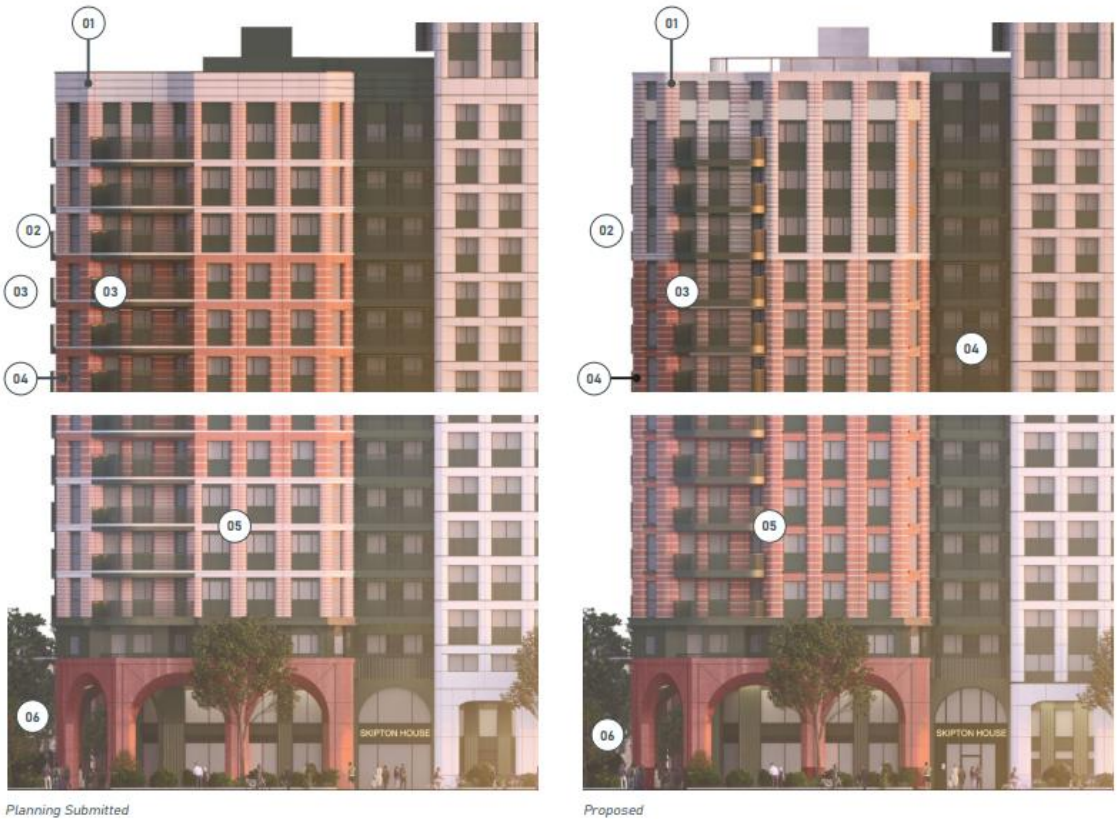


Image 33: Illustration of changes to architectural refinement of the residential buildings

256. In conclusion, the architecture is well considered and effective, bringing a strong architectural and material quality to the development, as well as a high functional quality to the commercial, housing and student uses. The submission includes bay studies demonstrating a depth of design work that is convincing and welcome. Furthermore, the design intent will be carried through to the final detailing and finishes, by way of a condition confirming the detailed design of the buildings. This will include the provision submission of sample materials and the construction of sample bays for the colonnade and new tall buildings. Overall, the architecture accords with policy P14.

Tall Building Matters

257. At 82m to 101m above grade, the affordable housing blocks and PBSA blocks are regarded as tall buildings for the purposes of P.17 of the Southwark Plan and policy D2 of the London Plan. Briefly running through the policy requirements for new tall buildings, in terms of the general location, policy 17.1 is satisfied: The development is within the Central Activities Zone and the Elephant and Castle Opportunity Area and Town Centre, which are considered broadly suitable for tall buildings. Indeed, the existing building on site qualifies as a tall building, being above the 30m threshold height (38m to the apex of the glass rooflight, and as such the development is for a replacement tall building, albeit considerably taller in height. Policy D3 of the London Plan is a key consideration, which seeks to optimise the capacity of underutilised brownfield sites through a design-led approach that can include a tall building, where appropriate.

258. In terms of the specific location, the development readily complies with policy 17.2, part 1 of the Southwark Plan, being at a point of landmark significance: The site is located on the junction of several major arterial routes into Central London, as well as sitting adjacent to the Elephant and Castle underground station (Bakerloo Line), with access to the northern Line. The new buildings would also form part of the cluster of existing and emerging tall buildings within the vicinity.
The proposed heights are considered proportionate to the significance of the location, with the towers cascading in height downwards from the metropolitan-scaled Eileen House (130m) in Keyworth Street to its rear, towards the underground station and gyratory, with the more moderately tall buildings of Metrocentral Heights (55m, Block B) and Perronet House (32m), immediately opposite. The proposed towers remain relatively moderate in height, albeit at the upper end of the range, but do not dominate the urban context or appear overbearing within the streetscape. As an ensemble, the building silhouettes will be distinctive with the cascading heights and the profiled crowns of the student towers making a notable contribution to the skyline, easily recognised and adding legibility to the station below, albeit more on a district rather than strategic perspective (P.17.2, parts 2 and 3).

259. Importantly, the site is not within the protected strategic views of St Paul's Cathedral, or within the borough's protected views of the cathedral. It is directly within the view of St. Paul's when viewed from the crest of Brockwell Park in Lambeth, where the cathedral is presently read in the distance within the gap between several residential towers in the middle ground (see view #3, HTVIA). The development, however, would block the cathedral from view.



Image 34: View of proposed development from Brockwell Park (view #3)

260. The LB Lambeth has raised no formal objection, but has asked that the development's impact on the view be taken into consideration, given its recognition within the council's draft Local Views SPD. The view is towards the City in general, with the cathedral appearing not as a particular focal view, but more as part of a crowded panorama, limiting its significance in the view. Presently, the local view has little statutory weight and has not been formerly recognised by the GLA or LB Southwark in their plans. The loss of the view from Brockwell Park is regrettable, but marginal in its significance and should be assessed against the direct benefits of the scheme to this Council.

261. The site, however, is in the background assessment area for the protected strategic views of the Palace of Westminster when viewed from within Parliament Square (LVMF 27B.2) and from the Serpentine Bridge (LVMF, 23A.1). For completeness, it is also visible on the skyline when looking towards the Palace of Westminster from Alexandra Palace (LVMF, 1A.2), but in this instance is outside the protected vista and therefore has no direct or significant impact on the strategic view.



Image 35: View of proposed development from Alexandra Palace (view LVMF, 1A.2)

262. The view within Parliament Square is from the north pavement, entering from Whitehall, and in this instance is focussed on the Elizabeth Tower and its relationship with Westminster Bridge Road, with New Palace Yard in its foreground and the Great Hall appearing to the right (see view #2). The road is framed by the Grade II listed no.34-36 Parliament Street to the left, with several buildings on Lambeth Road visible in the distance. A small part of the student tower 1a would be just visible in the background, at low level, to the left of St Thomas's Hospital; the light colour finish of the tower's crown blending with the hospital building. The development would appear recessive and would form a minor addition to the background context that would generally go unnoticed. Importantly, it would not affect the silhouette of the clock tower or its relationship

with its foreground context, resulting in a neutral impact on the Grade I listed building's setting, that of its Grade II neighbours opposite and of the World Heritage Site (WHS) in general.



Image 36: View of proposed development from Parliament Square north (view #2)

263. Regarding the view from the Serpentine Bridge, this townscape view is purposely arranged to protect the distant view of the Palace of Westminster, the towers of Westminster Abbey and the Westminster World Heritage site in general. The application site sits within the background to the wider setting consultation area of the protected view, some 5km away. The designated viewpoint is at the centre of the bridge looking eastwards across the lake and the dense tree cover of Hyde Park towards Parliament Square. The distinctive silhouettes of Victoria Tower, the western towers of the Abbey and the Central Lobby Tower are read against clear sky, while the Elizabeth Tower is obscured by the trees. The very tops of existing tall buildings within Elephant and Castle are just visible above the winter treeline, with the profiled form of Eileen House (2-50-1) discernible through the branches, albeit the buildings are just beyond the protected framed view.



Image 37: View of proposed development from Serpentine Bridge (view #1W)

264. The proposals have been carefully designed to respond to the protected view, with the development sized to sit within the tree cover, its towers stepping in height and their massing articulated to follow the treeline. As a result, while the towers sit within the protected frame, they would be fully obscured by the trees when in leaf, with no perceptible impact on the WHS and the settings of its listed buildings in this view (see view #1W). Furthermore, the submission suggests that the density of trees is sufficient to obscure the development during the winter months (see view #1W), although the likelihood is that there would be some 'ghosting' of the development with internal illumination. Nonetheless, the impact would be negligible, and therefore the strategic view would be preserved, which is welcome. Overall, the requirements of P.17.2, part 3 are generally met.

265. That said, the viewers' experience is kinetic and, given the high importance and sensitivity of the view, verified views have been provided from several further points along the bridge. While the development would not appear in views from the northern section of the bridge, its towers become discernible on the skyline when moving off-centre towards its southern end; initially its taller student towers notably appearing beyond the tree cover and the very tops of the residential towers evident, but in wintertime only (see views #1.6S and #1.6W); but all four becoming apparent further south throughout the year and especially during the winter months (see views #1.7S and 1.7W).



Image 38: View of proposed development from Serpentine Bridge (view #1.6W)



Image 39: View of proposed development from Serpentine Bridge (view #1.7W)

266. In these views, the development is prominent to the left of the Central Lobby Tower. While the development's form deliberately steps down towards the Central Lobby Tower and the latter's silhouette remains evident and recognisable, the overall scale of the development is challenging, impacting on the significance of the lobby tower and wider ensemble. In these views the

student towers appear taller and wider than the main body of the Central Lobby Tower and those of the Abbey further to the right. Furthermore, the housing blocks appear very close to the base of the Central Lobby Tower, with tower 2a leaving a slither of visible sky. During the application process, the tops of the residential towers have been refined, lightening the crowns' colour and the massing of the parapet finish, which will quieten their appearance in the backdrop, although the close proximity remains.

267. In these kinetic views, the proposals would cause a degree of harm to the settings of the WHS and its listed buildings. The harm would be less than substantial and of a low order, but nevertheless important given the significance and sensitivity of the WHS. It is notable that Historic England and the GLA reached similar conclusions. The proposals would not comply with policy P.24 of the plan, which only permits developments that sustain and enhance the significance of WHS and their settings, including views into, out of and across sites. Similarly, the impact and other heritage harms would in order to fully accord with policy P17.3, part 2, be required to consider the public benefit that the scheme would deliver.

268. In terms of the local character and townscape, however, as referenced earlier, the development would make a highly positive contribution to the local context, not only in resolving an underwhelming site on an important road junction, but also in providing an appealing architecture that will add to a strong sense of place. In particular, the designs for the podium and towers are a well-crafted and distinctive response to the site's specific conditions and constraints. It would frame the adjacent streetscape and create a memorable new public space and setting for the underground station entrance, providing greater legibility to the town centre.

269. It would also deliver an attractive, colonnaded pedestrian route, offering a direct link between London Road and Newington Causeway and avoiding the at times congested street corner. It would also provide widened pavements and new landscaping onto Newington Causeway and Ontario Street, the latter redesigned as shared pedestrian and cycle space, with vehicle servicing removed and more emphasis on pedestrian comfort. Overall, the proposed public realm improvements are considered commensurate with the scale of development (P.17.2, part 6).

270. The scheme may not provide for new publicly accessible space at or near the top of the new towers. However, it provides a sizable rooftop communal garden above the podium, as well as smaller gardens above the residential towers, while the students benefit from an extensive range of amenity spaces within the podium and its rooftop linking block, as well as throughout the upper floors of the PBSA towers, which are considered a more appropriate response, and as such satisfies the policy requirements (P.17.2, part 7).

271. Regarding P.17.3, part 1, as set out above, the architectural and functional qualities of the development are high and, depending on the delivery of the proposed detailing and material finishes, likely to be of exemplary standard, satisfying the policy requirement.

272. The massing and profiling of the podium and residential buildings have an appealing fluidity, while the student buildings have a more sober, but equally engaging appearance that works well in contrast. The development has a good secondary scale, with an evident rhythm and order to the elevations and clear sense of base, middle and top, with the towers coming to ground in an attractive manner. The scheme works well as an ensemble of buildings, while the colonnaded podium works well to deliver a notable public-face to the development. The general layout and built form are confirmed as not causing any undue environmental effects, with no harmful overshadowing of neighbouring residential properties or downdrafts (P17.3, part 3).

273. Matters of energy efficiency and sustainability, as set out in policy P17.3, part 4, are dealt with elsewhere in this report. Regarding part 5 of the policy, the site layout and design of the buildings' ground floors ensure a highly positive relationship with the public ream, with the delivery of the new colonnade and plaza, as well as widened and relandscaped footways, new street tree planting and enhanced local permeability. The adjoining public realm is well-animated by the buildings' ground uses, while the commercial uses and student amenity rooms at 1st floor level are cleverly arranged to overlook the colonnaded space. The legible entrances to the residential and student towers onto Ontario Street and Newington Causeway are effective and particularly welcome, satisfying the policy requirements.

274. Returning briefly to heritage matters, the site itself does not include a designated or non-designated heritage asset and is outside a conservation area. Nonetheless, a key factor is the visual impact of the development on the significance of nearby heritage assets. As discussed below in more detail, the proposed development appears within the settings of a number of heritage assets within the locality, although the impacts are generally modest and neutral rather than unduly harmful.

275. There are, however, several exceptions, notably where the scheme causes less than substantial harm to the settings of the Grade II* St Geoge's obelisk and the Grade II Metrocentral Heights, Metropolitan Tabernacle and terraced housing within West Square; as well as less than substantial harm to the settings of West Square and St George's Circus conservation areas. The harm in these instances is in addition to impact on the setting of the World Heritage Site when viewed from the southern sections of the Serpentine Bridge. Clear and convincing justification is required in the form of public benefits if the scheme is to comply with the requirements of policy P17.3(2) in full.

276. In this instance, there are a number of significant design benefits arising from the scheme. They comprise the improved architecture and public space, with its strong identity and sense of place; a much-enhanced setting of the locally listed underground station; the improved permeability of the site; the increased activation and animation of its building frontages; and the more coherent streetscapes, widened pavements and refreshed public realm of Ontario Street and Newington Causeway.

277. Overall, the proposals broadly satisfy the criteria for a tall building development. Regarding the London Plan, the criteria for its tall building policy (D2) are not dissimilar to those of Southwark Plan policy P17 regarding the architecture and

urban design quality, and therefore a similar conclusion for policy D2 is reached. The remaining factors are functional, relating to safety, transport capacity, servicing, employment and construction (D9.C.2).

Heritage Matters

278. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires local planning authorities to consider the impacts of a development on a listed building or its setting and to have “special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses”. This is reflected in London Plan and Council policies (HC1 and P.19, respectively). A similar emphasis is placed on the preservation and enhancement of conservation areas as designated heritage assets within the London Plan (HC1), Southwark Plan policy P.20 and the NPPF (December 2024).

279. The NPPF provides guidance on how these tests are applied, referring in paras 212-215 to the need to give great weight to the conservation of the heritage asset (and the more important the asset, the greater the weight); evaluate the extent of harm or loss of its significance; generally refuse consent where the harm is substantial; and, where necessary, weigh the harm against the public benefits of the scheme. Paras 213, the NPPF goes on to state 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.” Para 216 also advises taking into account the direct and indirect effects of a scheme on the significance of a non-designated heritage asset. This would include locally listed buildings, which are also addressed by the Council’s policy P.26.

280. The planning submission includes a Heritage and Townscape Visual Impact assessment (HTVIA, November 2024), a map showing the Zone of Theoretical Visibility (ZTV), and extensive series of townscape views, including verified renders and wirelines of the development when viewed from 22 locations, mainly in and around the Elephant and Castle town centre. The images included winter and nighttime shots. A number of the verified views were updated in June 2025, taking account changes made to the detailed architecture during the application’s progression.

281. The ZTV indicates that the development would be visible in all directions, but mainly in pockets and long stretches that relate to parkland, garden squares and open spaces and to railway bridges, railway viaducts and arterial roads that align with the site. A number of nearby residential roads are impacted mainly to the southwest through to the northwest, and to the east of the site, although large sectors to the south and southeast are less affected, with the development obscured from view by the cluster of existing tall buildings within the town centre and Elephant Park. The tight urban condition of the area’s terraced streets and moderate scale of its social housing estates are often likely to limit its wider visibility. The verified views have been selected to demonstrate its appearance within the immediate townscape, but also in a series of heritage sensitive locations within the geographical spread.

282. In addition to the Palace of Westminster and St Paul's (see above), a verified view has been prepared showing the Grade I listed Southwark Cathedral, as viewed from the middle of London Bridge. The cathedral is of high significance for historic, cultural and architectural interest, while its immediate setting is formed by its remnant churchyard, but also by the highly urban context of Borough Market, the Victorian railway viaduct and London Bridge cutting close by. From the bridge, its setting is formed by the Grade II listed Drapers Hall and moderately scaled buildings and Minerva Square on the riverfront, with the cathedral's tower prominently rising above (see view #4). The Strata tower and Eileen House appear in the wider backdrop, set away from the cathedral, while Highpoint appears to one side, interfering with the tower's silhouette at its middle stage.



Image 40: View of proposed development from London Bridge (view #4)

283. The wireline image indicates that the development would be visible in the background, located to the west of the cathedral, reading slightly above the moderately-scaled foreground in a similar position to Eileen House. Its visibility would add to the built context around the cathedral, but would not affect the tower's silhouette or particularly affect its prominence in the view. As such, its impact on the cathedral's setting would be minor and neutral on the Grade II listed Draper's Hall.

284. Regarding Grade II* listed heritage assets within the general vicinity, views are provided showing the proposed development in relation to the Church of St George the Martyr in Borough High Street and the obelisk of St George's Circus. The church dates from 1734, replacing its mediaeval predecessor, with its interior altered in the late Georgian period and restored mid-20th century following a fire. It is a highly significant heritage asset, as Southwark's oldest surviving parish church and for its sturdy classical design in red brick and Portland stone, and landmark position. The church forms a key point within

Borough High Street, as its junction with Great Dover Street, with the church stepping forward as Borough High Street bends. Its setting is formed by the open roadway of the junction and by the uniform heights of the modestly scaled terraced buildings that frame the streets as they approach the church and junction.

285. View #A7 suggests that the development would seen between the towers of Eileen House and the Kite building in Newington Causeway, visible in the background above the terraced street as the roadway heads southwest and away from the church. It would appear similar in height to the Kite building and below the knuckle point of the angled façade of Eileen House and read as part of the distant high-rise context of Elephant and Castle's town centre. The appearance of the church and its relationship with its street scene would be unaffected, having a neutral effect on its setting, as well as that of the Borough High Street Conservation Area (sub-area #2).



Image 41: View of proposed development from Newington Causeway (view #A7)

286. Regarding St George's Circus, the Grade II* listed obelisk is located c.350m to the northwest of the site and is the centrepiece of a planned Georgian layout of terraced streets that radiated from the circus. Sections of the terraced housing survive and are Grade II listed, with those onto the circus featuring concave frontages. The inscribed Portland stone obelisk records its dedication to King George III, coats and alms and distances to the Palace of Westminster, Fleet Street and London Bridge, serving at the time as a signpost.

287. The circus is an attractive, formal composition and is of historic significance, recording the urbanisation of this part of south London and the development of a

new road system following the opening of Blackfriars and Westminster Bridges in the mid-18th century. The surviving terraces are Grade II listed and are of a relatively small domestic scale, with those onto the circus featuring concave frontages and shopfronts, including the former Duke of Clarence public house. The obelisk forms a significant group with the former pub (no.132 London Road), nos.2-14 and 123-131 London Road, no.113-119 Borough Road, the former Presbyterian chapel and St George the Martyr Library in Borough Road. The group are the main constituent of the St George's Circus conservation area, which includes the early/ mid-19th century terraced housing with shops at no.15, 15a and 16a London Road; the late Victorian underground depot building; and Neo-Georgian Caxton House library in Borough Road, which are locally listed.

288. While the obelisk and terraced blocks are a planned composition and form an immediate setting as a group, the obelisk was conceived as a landmark and visual focus for the approaching streets, which constitute the wider setting. Eileen House, however, is a prominent tall building in the backdrop of the circus, disrupting the historic setting, albeit its profiled façade gestures towards its lower scale. The Strata, One the Elephant and Highpoint form slender towers in the distance.

289. View #6 shows the development, which would sit to the right of Eileen House above the Grade II listed former pub and adjacent terrace along London Road, but would appear away from the obelisk. However, as the circus is experienced kinetically, the development's main bulk would visually encompass the obelisk when viewed from the corner of Waterloo Road and Blackfriars Road. While the stepped massing and varied architecture of the student and residential blocks would be read and offer moderate relief to its bulk, the development would remain overwhelming in the context of the obelisk and low-scale terrace, disrupting their settings and that of the conservation area. However, consent has been granted to tall buildings of a similar height within the town centre that in time would become as apparent in the backdrop, albeit not coalescing to present such a bulky built form. As such, the harm to the heritage settings is considered less than substantial harm, and of low to medium extent, acknowledging the heritage value of the Grade II* obelisk.



Image 42: View of proposed development from St Georges Circus (view #6)

290. The West Square conservation area is c.160 to the west of the application site and largely comprises Grade II listed terraces of high quality late Georgian and mid-19th century townhouses and a number of significant public buildings, including the Grade II listed Imperial War Museum, set within Geraldine Mary Harmsworth Park, and the Grade II listed St George's Roman Catholic Cathedral (1841-48, Pugin), with its adjacent Archbishops House. The conservation area notably includes the formal Georgian townscape of West Square, with its central gardens and near complete terraces of townhouses enclosing the space. It also stretches northwards across St George's Road to encompass the former St Jude's Chapel (1803, largely rebuilt 1888, Peacock) and the coherent early/ mid-Victorian townscapes of Colnbrook Street and Gladstone Street. The significance of the heritage assets is their architectural and historic interest as fine examples of period housing and urban planning, reflective of the urbanisation of this part of south London, and group value, with the visual coherency of their streets, as well as the architectural and cultural interest of the public buildings. The setting for the Imperial War Museum is its parkland, main roads and neighbouring period terraced housing. That of the cathedral is its period streetscape. West Square has the compositional setting of its terraces surrounding the central garden, while elsewhere the streetscapes form the immediate settings. Wider afield, the low-rise, period character the St George's Circus conservation area to the northwest, Walcot Square conservation area (LB Lambeth) to the south and Elliot's Row to the east form a large part of the wider setting, with the high-rise buildings of Elephant and Castle town centre forming the backdrop further to the east and to the northeast. The HTVIA includes a number of verified views within the conservation area, showing the appearance of the development in relation to its constituent listed buildings (views #5, #15, #16, #A12, #A14 and #B27).

291. Looking at the views, view #5 shows the Grade II listed St Jude's chapel, a former Anglican church, with its robust red brickwork and simple stone dressing, with lancet windows, east-facing gables and short polygonal bell turret in a simple gothics style. In this view the chapel is seen alongside the mid-19th century white rendered townhouses (no.110-116 and 104-108), which are locally listed. Eleen House is present within the background, sitting to the right of the chapel, but notably away and below its turret, appearing more above the adjacent terrace (no.104-108). Its angled façade gestures down to the terrace, while its light colour blends with the terrace's white render. The street tree in the foreground largely obscures the view of the turret and Eileen House when in leaf. The proposed development would sit alongside Eileen House further on to the right and away from the chapel, its light-coloured student blocks and tops of the housing blocks picking up the colour of Eileen House and the rendered terrace. The stepped massing is evident and is the darker colouration of the mid-section of the residential towers, although this is seen more in relation to the properties further eastwards along St George's Road. As with the turret and Eileen House, the development would be largely obscured from view by the tree cover when in leaf. As such, the development would have a neutral impact on the settings of the chapel, locally listed terraces and this part of the conservation area.



Image 43: View of proposed development from St Georges Road (view #5)

292. View #15 and #B26 are from the southwest corner of West Square, looking northeast towards the application site, with view #15 notably showing the terraced houses enclosing the gardens in the foreground. View #A14 is from the centre of the gardens. The mature planting within the gardens and street trees partly screen the buildings, although their unform massing and designs remain prevalent and make for an attractive formal composition. For the most part the urban form is read against clear sky, adding to its visual coherency and string sense of enclosure. Eileen House rises above the roofline at the junction

between the two terraces, ‘ghosting’ through the trees during the winter months, its contrasting scale and modern appearance sufficiently visible to detract from the setting of the terraces and this part of the conservation area. In this view, the development will be read alongside Eileen House, the built forms and white finishes of the student blocks coalescing with Eileen House. The darker coloured residential towers are more evident to the front, although the quality of the architecture is difficult to discern through the branches in view #15 and only marginally better in view #A14. The appearance of the development in these views and the cumulative effect with Eileen House is adverse, detracting from the heritage settings in this view. The impact would be lessened when the trees are in leaf, albeit the buildings would be evident in kinetic views. The harm is less than substantial and towards the low to medium range.



Image 44: View of proposed development from West Square (view #15)

293. View #16 is of the development when viewed eastwards along Gladstone Street, close to its junction with Colnbrook Street, with the street’s uniform terraces of mid-19th century housing making for a coherent and attractive streetscene. Elieen House is prominent in the backdrop, its contrasting height and modern architecture rising abruptly above the roofline, softened to an extent by the profiled façade that gestures towards the lower scale of the terrace. Its impact is nonetheless disruptive. The proposed development would again appear alongside Eileen House, albeit with sky between the two and partly masked by a mature rear garden tree. While not as strident as Eileen House, the impact would nonetheless be adverse, particularly during winter months, breaching the roofline and drawing attention, causing less than substantial harm and of a low order, acknowledging the less formal composition.



Image 45: View of proposed development from Gladstone Street (view #16)

294. View #A12 is from the Imperial War Museum, standing in front of the guns, looking towards the site, with the parkland setting of Geraldine Harmsworth Park in the foreground stretching westwards. Mansion blocks, rendered terrace housing and St. Jude's Chapel and 1960s walk-up flatted blocks of the Gaywood Estate are seen to border the park, with Eileen House rising above the mid-rise townscape, ghosting through the winter tree cover, in the distance. The Shard appears in a similar fashion, left of centre. The wireline shows the development would appear alongside Eileen House, but with sky between them. In this instance, the setting of the museum within its broad expanse of parkland and mature tree cover is less affected by the appearance of the towers, with the museum's visual predominance and isolated character within its landscape remaining evident. As such, the development would have a neutral impact on the listed building's setting, although there would be some harm to the wider conservation area with the cumulative impact of the additional high-rise above St George's Road. The impact would be less than substantial and of a very low order.



Image 46: View of proposed development from the Imperial War Museum (view #A12)

295. Views #12, #A9-11 and B19 are from within the Trinity Church Square Conservation Area, located 450m to the northeast of the application site, which is characterised by the Grade II listed terraces that enclose two garden squares and their feeder streets, with the Grade II listed former Holy Trinity Church (1824, Bedford) forming the centrepiece of one of the two squares, with the Grade II listed King Alfred statue in its grounds. Competed over a short period in the early 19th century, the terraces of feature a high degree of uniformity, lending a strong visual order, with the classical church adding a grandeur to the streetscene. The layout and high quality of architecture are of architectural and historic interest as a complete, late Georgian set piece within Southwark, with the church adding cultural value. The complete form of the streets and squares results in an enclosed setting to the listed buildings and conservation area in general, with the treed open spaces of Dickens Square and Newington Gardens forming the intermediate setting to the south. For the most part the former church and terraces are seen against sky. However, the tops of Eileen House and the Kite building are visible to the southwest, appearing above the roofscape of Trinity Church Square (west) and from the junction with Swan Street during wintertime, seen through the trees (#12 and #A10). Their impact becomes more evident and disruptive when seen from Trinity Street (#A9).



Image 47: View of proposed development from the Trinity Church Square (view #A10)

296. Regarding the proposed development, this too would be visible, but limited to the views from the central section of Trinity Church Square (north), with the tall buildings obscured by the Kite building in the middle ground or falling below the roofline of the church or terrace in the views from the edges (#A9, A11 and A12). In the central section of the street, the student towers would be visible, appearing to the immediate left of the Kite Building, adding to the unattractive coalesce of tall buildings visible above the roofscape during the wintertime. The tree cover would help screen the impact during the summer, limiting the harm, albeit the cumulative built form would occasionally be discernible during autumn and spring (view #12S), particularly with internal lighting. Overall, there would be less than substantial harm to the settings of the listed terrace, church and conservation area, albeit this would be of a low order.



Image 48: View of proposed development from the Trinity Church Square (view #12S)

297. View #17 is from the southside of Walcot Square, LB Lambeth, which is within its Walcot Conservation Area. The townscape comprises the triangular-shaped residential square surrounded by simple, two-storey terraced houses, dating from the mid-19th century. The uniform design and completeness of the terraces is of significance, with the housing designated Grade II listed. The low-rise form of the terraces, lack of street trees, relatively wide central space and strong axial view along the south side of the square give a more open character to the setting. One the Elephant is prominent in the axial view along the street, with the tall slab block of Elephant Central and the new towers of the replacement shopping centre under construction appearing towards the end of the terrace. The student blocks would appear above the roofline of the central section of the terrace, marginally visible through the tree cover during wintertime, albeit remaining evident in kinetic views. The harm to the heritage settings would be of a low order. It is notable that the LB Lambeth has not raised an objection to the matter in its consultation response.



Image 49: View of proposed development from the Walcot Square (view #17)

298. Lastly, in terms of conservation areas, the Elliott's Row conservation area sits closest to the site at just under 50m to the southwest. The conservation area is a one of Southwark's smallest conservation areas, comprising 3.9ha, bounded by Brook Drive, Oswin Street, West Square conservation area to the west and St George's Road to the north. Formed of mainly three-storey, Victorian and Edwardian terraced housing and mansion blocks, the townscape has a handsome, domestic character, interspersed with traditional corner shops and public house, making for a coherent and appealing inner-city townscape, typical of the late 19th/ early 20th century period. While none of its buildings are statutory listed, many of them are locally listed for their townscape merit. Its immediate setting is its tightly formed streets, with the West Square and Walcot Square conservation areas providing a complementary setting to the west. Its proximity to the town centre, however, results in a more varied and fragmented backdrop to the north, east and south, with the large-scale post-modern Perronet House and UAL buildings, new high-rise of One the Elephant, Highpoint and Strata and the late 20th century housing estate in Dante Road forming a less flattering, modern day backdrop that does not particularly contribute to its significance. Views #B23-25 show this modern-day backdrop to the conservation area, with wireline views indicating the approved masterplan scheme for the replacement of UAL (Elephant and Castle West) and the proposed development. The latter would read as part of the cluster of tall buildings within the town centre that appear above the roofscape of the late Victorian and Edwardian terraces, having a neutral impact on the setting of the conservation area.



Image 50: View of proposed development from the Elliott's Row conservation area – Hedger Street (view #B24)

299. Lastly, several statutory listed buildings sit within relative proximity to the development, but are not within a conservation area. They include the Grade II listed Metropolitan Tabernacle; the Michael Faraday building; Metrocentral Heights; the Inner London Sessions Court; the Star and Cross Church in Falmouth Road; the Duke of York Public House, no.47 Borough Road; Hanover House, no.49-60 Borough Road; and no.62 Borough Road.

300. Taking them briefly and in reverse order, those in Borough Road are on the north side of the street, with the development located some 320m to the south, behind the viewer and with Elieen House intervening, and as such there would be no impact on their settings. Similarly, the Cross and Star Church is appreciated when viewed from Falmouth Road and its open space, looking north-eastwards towards the church, with the proposed development some 320m to the west and having no impact on its wider setting.

301. The Inner London Sessions Court (1914-21, Riley) is a restrained classical building on the site of the Surrey County Gaol and 18th century courthouse. Constructed in brick and faced with Portland stone, the u-shaped building with symmetrically projecting wings features a robust architectural language of a piano nobile with a rusticated base, corner quoins and heavily keyed entranceways in a grand civic manner. The building forms a notable landmark at the junction of Borough Road/Harper Road and Borough High Street/Newington Causeway. The building sits behind a forecourt setting, with a low Portland stone boundary wall and gateway and trees. The building is designed to be seen by the public head-on from Newington Causeway and against the backdrop of Newington Gardens, with its mature tree canopy. In this position, the development appears peripheral to the viewer, c.290m to the southwest. View #8 shows the relationship between the development and Grade II listed

building when seen from the northwest corner of the road junction, with the tall buildings of the Kite, Eileen House and the Signal Building further along Newington Causeway, forming the gateway to Elephant and Castle town centre. The wireline indicates the proposed development would form part of this cluster of tall buildings, with the student and residential towers progressing towards the main centre. In this view the Grade II listed building is obliquely read in the foreground, discretely away from the cluster, behind its forecourt setting. The proposals would have a neutral impact on its setting.

302. Views #13 and #20 show the development in relation to Metrocentral Heights (1959-66, Goldfinger); a complex of four tall slab blocks of 9 to 18-storeys, laid out on a north-south axis and arranged in a diamond formation around a central landscaped courtyard with pond. Formerly Alexander Fleming House and occupied by the Ministry of Health, the office buildings were converted to residential in 2002 and include ground floor shops and pub onto Newington Causeway. The complex is of significance as an excellent piece of modern architecture by a renowned architect and as a key element of the postwar comprehensive replanning of the Elephant and Castle town centre. Its present setting onto Newington Causeway is dominated by Elieen House, diagonally opposite, and is undergoing change to the south with the redevelopment of the shopping centre. Its setting to the east comprises mainly the Victorian railway viaduct and the 1930s Rockingham Estate and is largely unchanged. View #13 shows block D of Metrocentral heights within the context of the Rockingham Estate, with the listed building terminating the view along the street. The regular framework of its gridded form and projecting stair tower are evident, with the end oriel bays offering notable detailed design interest, silhouetted against the sky. The much taller Eileen House appears to its right, above the tree and the estate’s Aird House. In this view the development would sit directly behind the listed building, having an adverse effect. The busier grid of the student tower and its slightly offset position sit awkwardly projecting above block D. The residential tower seemingly extends the listed building’s form, sharing the same parapet line, but with a change in finishes. The effect becomes more pronounced in the nighttime view, with the clear form of the listed building lost. The harm is less than substantial and at the low end of the range, given the view is incidental.



Image 51: View of proposed development from the Rockingham Street (view #13)

303. View #20 offers a panorama viewed from in front of Perronet House, looking towards the Bakerloo Station, with blocks A and C of the listed complex visible to the right. In this view the current Skipton House reads in a not dissimilar plane to block A, albeit slightly taller, but with the station in-between. Eileen House appears as a slender tall building behind Skipton House. The change in scale with the proposed development is emphatic, with the new towers dominating the close-range view, albeit the towers would remain sufficiently away from Metrocentral Heights in this view, not to impede directly on their setting. The impact is generally neutral. It is notable that the development's podium relates well to the locally listed Bakerloo Line station, its red arches tying in with those of the station, enhancing its townscape setting.



Image 52: Panorama view of proposed development from in front of Perronet House (view #20)

304. In this view, the Michael Faraday memorial (1959, Gordon) can be seen to the edge of the image, sat within the green landscaping of the gyratory, its distinctive dimpled form, stainless steel panelling and black-painted steel structural support easily recognised. In this view the development is sufficiently distant not to affect the listed structure's setting, which was designed to be read as a centrepiece of the gyratory and postwar townscape. View #19 provides the

best view of the memorial, seen terminating the view along the wide carriageway of Newington Butts, with the present Skipton House rising in the background and the station screened by trees. The tall slender tower of Eileen House sits to the right, as does the partly constructed large scale buildings on the shopping centre. The memorial has always appeared diminutive within its town centre setting, its high-tech design reading as a sculptural piece, albeit pragmatically concealing a transformer station for the underground. As such, while the development would bring an emphatic change to the townscape, the impact on the significance of the setting to the listed structure would be neutral, with its sense of place within the town centre unaffected.

305. Lastly, view #19 includes the Grade II listed Metropolitan Tabernacle (1859-61, Pocock), rebuilt extensively in 1959, with its original Corinthian portico with pediment set within its eastern façade (Seale and Hayes, 1898). The building is of significance as a notable landmark building of civic quality and as one of the few surviving prewar period buildings in the town centre, reflecting the history and growth of the Elephant and Castle area. The building has lost its historic built context, its setting considerably altered by the postwar comprehensive redevelopment of the town centre and its current day replacements, albeit the developments have generally responded to the scale of the listed building, with the street-facing block of One the Elephant and current UAL building maintaining the general building line and roofline of the church, with the giant portico stepping forward to maintain its predominance within the streetscene.



Image 53: View of proposed development from south roundabout from Tabernacle (view #19)

306. The current Skipton House is recessive in the background, with the pediment read against open sky in this view, and with the existing tall college building set back from the church's facade. By contrast, the development would emphatically change the streetscene, terminating the vista and with the

residential block 1b clashing in scale and appearance with the portico, diminishing its presence. The consented redevelopment of UAL will bring further change, although the wirelines indicate that the replacement taller buildings would be positioned rearward of the church's façade, with the portico's profile unaffected in this view. As such, the current application would have an adverse impact on the listed building's setting, causing less than substantial harm, but towards the lower range.

Conclusion on Heritage

307. While the development is within a location identified as generally suitable for tall buildings, it will nonetheless cause less than substantial harm to a number of designated heritage assets both within the vicinity of the development and beyond. They notably include the wider setting of the Westminster World Heritage site, albeit the harm is of a low order and the strategic view would be unaffected. Less than substantial harm of a low to medium order would be caused to the setting of the Grade II* St George's circus obelisk and conservation area, and similarly to parts of the West Square conservation area and its listed terraces. The impacts on Trinity Church Square and Walcot Square conservation areas and their constituent listed buildings would be adverse, but of a low order, as would its impact on block B of Metrocentral Heights. Elsewhere, the development would have a neutral effect on a number of designated and locally listed buildings, including those of Elliot's Row conservation area, which would also be unaffected. The setting of the locally listed Bakerloo Station on-the-other-hand would be enhanced.

308. The scheme has sought to address the impacts through carefully massing and detailed designs to minimise the harm, with a reasonable degree of success, albeit some harm remains. As such, the development would not fully accord with policies P.19, P.20 and P.24 of the local plan and HC1 of the London Plan, and should be reviewed against the wider public benefits of the scheme in accordance with policy P.17.3 part 2 And the NPPF.

Southwark Design Review Panel (DRP)

309. The Design Review Panel (DRP) reviewed the proposed redevelopment of Skipton House as a pre-application scheme at its meeting of 13 February 2024. At that time the mixed-use scheme included c.1,500 student rooms and 200–220 affordable homes above the commercial podium.

310. The DRP broadly accepted the proposed height and massing of the development, acknowledging its central London location and the skilful articulation of its form. However, it expressed concerns about the density and quality of the accommodation, particularly the student housing. Issues highlighted included overcrowded cores, inadequate shared spaces, and poor design features such as single-aspect rooms and lack of appropriate play space for children. The panel also highlighted the potential negative impact on adjacent sites and questioned the long-term viability of the building if its use were to change from student accommodation.

311. Landscape and public realm aspects were also scrutinized. While improvements near the Bakerloo Line Station were welcomed, the podium-level communal space was deemed inadequate, especially for children aged 5–11. The panel urged a redesign to ensure better sunlight, wind conditions, and usability. Ontario Street's design was flagged for its lack of clarity in accommodating pedestrians, cyclists, and public functions. Additionally, the reliance on nearby parks for child play space was challenged.

312. Concerns extended to the quality of both student and affordable housing. The student accommodation lacked sufficient and suitable social spaces, while the affordable housing was criticized for its location near a noisy, polluted roundabout and for potentially unsuitable unit configurations. The panel advised early engagement with a Registered Social Landlord to refine the housing mix. It also encouraged the inclusion of civic spaces, such as a theatre and public route, reflecting the site's strategic importance. While supportive of the energy strategy and circular economy principles, it urged a practical net-zero approach. Overall, the panel recommended a thorough review and refinement of the scheme before resubmission.

313. In response the scheme architects have refined the designs, improving the layouts of the residential and student housing blocks, improving the aspect and configuration of the accommodation and bringing daylight to the student cores. Generous social amenity facilities have been designed into the student accommodation, while the rooftop gardens have been designated for sole use by the residents and decent playspace including. A civic space has not been provided, although the flexible use of the plaza for events has been highlighted and the colonnade provides a public east-west connection with a civic quality. The student foyer includes an informal auditorium space. Lastly, the climatic conditions have been confirmed as benign. Overall, the architects' approach has generally been positive to the Panel's comments.

Design conclusion

314. The application scheme is for a large-scale, tall building complex providing a mix of residential and purpose-built student accommodation and commercial floorspace in a high-density development. Generally deemed to be a suitable location for tall buildings, the scheme replaces a lacklustre 1990s office building and underwhelming public space with a development of a high quality of architecture and urban design.

315. The scheme is notable for its podium base with its curvilinear form and colonnaded design that provides an appealing secondary scale and engaging frontage to the development; better addresses the adjacent streetscapes; draws the hitherto isolated locally listed Bakerloo Line station into a coherent townscape; and frames a compelling new open space. It has the potential to deliver good activation and informal surveillance of the public realm, albeit much will depend on the curation of the commercial uses and management of the new plaza and colonnade. The layout will also improve permeability and provide a civic space for the station entrance. The detailed architecture is engaging and exemplary, including material and functionality, although carrying this through to

the scheme's delivery is important, requiring detailed bay studies and samples that maintain the design intent in full, which will be secured by condition.

316. The scale of the towers is challenging, although the stepped massing brings a dynamic quality the scheme when seen within the surrounding street context. The height and massing of the towers have been carefully orchestrated in response to the LVMF view of the Westminster World Heritage site from the Serpentine Bridge, although the scale is at its maximum, barely hidden by the tree cover in Hyde Park. The towers are revealed on the periphery of the Palace of Westminster when moving to the south, with the tall buildings appearing prominent and encroaching on the Central Lobby Tower, causing minor harm to the setting, albeit in a less important, but nonetheless sensitive view of the WHS.

317. The scheme's height is also challenging in a settings of a number of heritage assets around the wider Elephant and Castle area, causing less than substantial harm notably to the Grade II* St George's Circus obelisk and conservation area and West Square conservation area and their constituent listed terraces, and to the Metropolitan Tabernacle in Newington Butts, with the harm being of the low to medium order. It causes harm of a low order to Trinity Church Square and its conservation area and that of Walcot Square (LB Lambeth) and to block B of Metrocentral Heights, albeit the harm is distinctly of a low order. Many other designated and locally listed buildings are unaffected, including the notable Grade I Southwark Cathedral, while the borough views of St Pauls are unaffected.

318. Efforts have been made to minimise the harm in places, with careful modelling of the towers and careful detailing of their finishes, although the harm nonetheless remains, reflective of a high-density development with its highly accessible, town centre location. The heritage impacts can be weighed largely against the design benefits of the scheme in replacing the current building with a development of a notably improved quality and delivering a welcome open space, positive public realm, improved local permeability and improved local townscape.

Landscaping and trees

319. The proposed development includes the removal of 5 individual trees from within the site boundary. However, a detailed landscape strategy has been designed to maximise planting and green space across the site to mitigate the loss of these trees. A total of 50 new trees are proposed across the site, accounting for 16 new trees at ground floor within the public realm, 29 at the podium garden level and 5 within one of the residential terraces. Further greening is proposed to Skipton Circus and Newington Causeway in the form of structural shrubs, ornamental grasses, semi green and evergreen species and perennial planting. In addition, an area of native hedgerow is proposed to the rear of the existing tube station while smaller groups of flowering perennials and semi-evergreen species are proposed to the podium level and roof terraces.



Image 54: Landscape design

320. Planting has been specifically selected to ensure seasonal and visual interest to enhance the setting of public realm spaces at the ground floor as well as areas of private outdoor amenity at the upper levels. A mix of native and non-native plants are proposed which will attract pollinators and invertebrates to boost local ecology.

321. Overall, the proposed development includes the retention of high-quality trees and extensive new planting and landscaping which will achieve a biodiversity net gain of 18.08% (in excess of the 10% required). As such, the Application complies with London Plan Policy G8, as well as Local Plan Policies P13, P15 and P61.

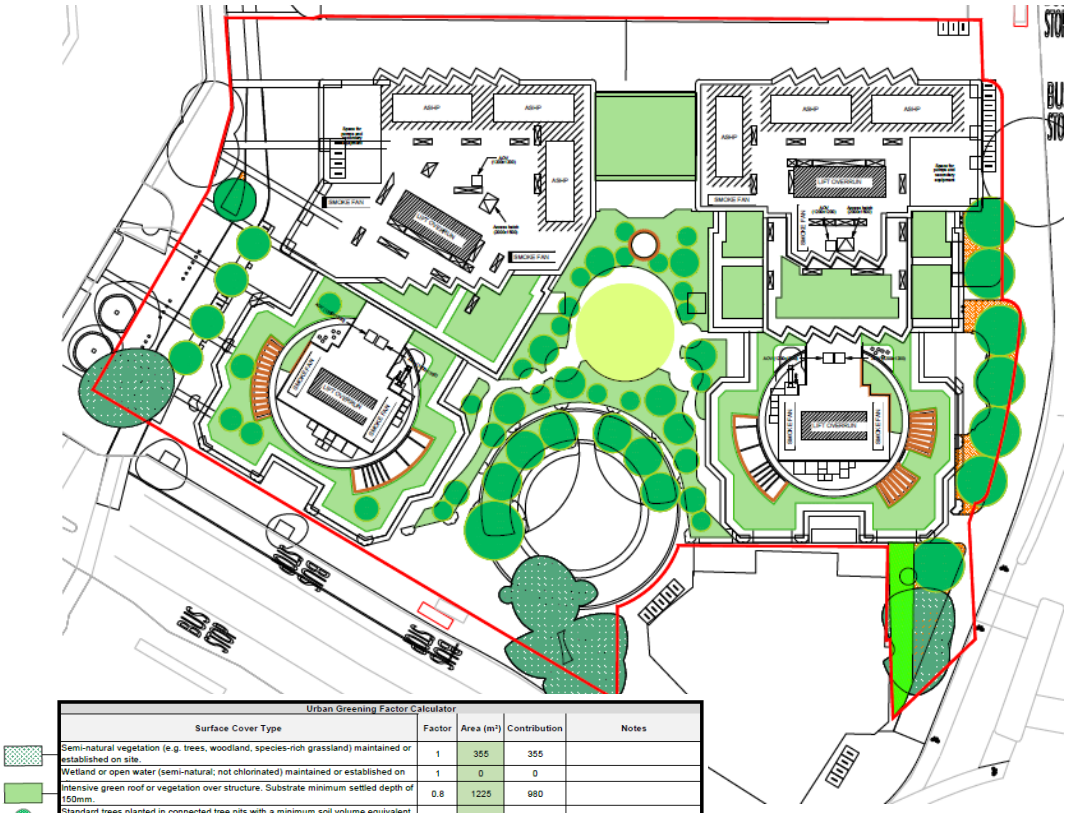
Green Infrastructure, Ecology and biodiversity

322. Policy G5 of the London Plan states that urban greening should be a fundamental element of site and building design. It requires major developments that are predominantly residential to achieve an Urban Greening Factor (UGF) score of 0.4, while commercial/sui generis uses need to achieve a score of 0.3.

323. The protection and enhancement of opportunities for biodiversity is a material planning consideration. London Plan Policy G6 requires development proposals to manage impacts on biodiversity and secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process. Southwark Plan Policy P60 seeks to enhance populations of protected species and increase biodiversity net gains by requiring developments to include features such as green and brown roofs, green walls, soft landscaping and nest boxes.

Urban greening

324. The proposed development achieves an UGF score of 0.34 which is a combination of green and intensive roofs to a depth of 150mm, new tree planting and retention of existing trees. The images below illustrate the location of landscaping and urban greening on the site.



Urban Greening Factor Calculator

Surface Cover Type	Factor	Area (m²)	Contribution	Notes
Semi-natural vegetation (e.g. trees, woodland, species-rich grassland) maintained or established on site.	1	355	355	
Wetland or open water (semi-natural; not chlorinated) maintained or established on	1	0	0	
Intensive green roof or vegetation over structure. Substrate minimum settled depth of 150mm.	0.8	1225	980	
Standard trees planted in connected tree pits with a minimum soil volume equivalent to at least two thirds of the projected canopy area of the mature tree.	0.8	635	508	
Extensive green roof with substrate of minimum settled depth of 80mm (or 80mm beneath vegetation blanket) – meets the requirements of GRO Code 2014.	0.7	0	0	
Flower-rich perennial planting.	0.7	259	181.3	
Rain gardens and other vegetated sustainable drainage elements.	0.7	0	0	
Hedges (line of mature shrubs one or two shrubs wide).	0.6	51	30.6	
Standard trees planted in pits with soil volumes less than two thirds of the projected canopy area of the mature tree.	0.6	0	0	
Green wall –modular system or climbers rooted in soil.	0.6	200	120	
Groundcover planting.	0.5		0	
Amenity grassland (species-poor, regularly mown lawn).	0.4	104	41.6	
Extensive green roof of sedum mat or other lightweight systems that do not meet GRO Code 2014.	0.3	0	0	
Water features (chlorinated) or unplanted detention basins.	0.2	0	0	
Permeable paving.	0.1	0	0	
Sealed surfaces (e.g. concrete, asphalt, waterproofing, stone).	0	0	0	
Total contribution			2216.5	
Total site area (m²)			6407	
Urban Greening Factor			0.345949742	

Image 55: Map of the Site showing proposed greening strategy including UGF calculation

325. The proposed landscape design includes a total of 50 new trees and uplift in canopy area of 635m^2 which is a considerable improvement for the site. Opportunities to maximise greening on the site were explored during the assessment of the Application however due to vehicle servicing requirements, , play space requirements, access and adjacent building constraints, the scheme would fall short of the target score of 0.4. The applicant has identified a shortfall of 18 trees to meet the UGF target which could be accommodated as the detailed design of the proposal develops post development consent. Council's Urban Forester has also identified potential locations for new tree planting should further opportunities to improve the UGF develop.

326. In order to provide off-site mitigation for the UGF shortfall, Officers have recommended that a review mechanism form part of the s106 agreement whereby payment of a financial contribution would only be triggered in the event an UGF score of 0.4 is unable to be achieved. This would account for £4000 per new tree.

327. Overall, subject to a financial contribution calculation being included as part of the s106, the scheme would be consistent with the policy expectations for predominantly residential developments under LP Policy G5.

Ecology

328. The applicant's Ecological Appraisal prepared by LUC includes habitat surveys, potential roost assessments, inspections of trees, searches for notable species, and various species surveys. The key findings of the report note that the site mostly consists of buildings and hardstanding with negligible ecological value while scattered trees offer limited ecological connectivity.

329. The appraisal identified that opportunities for bats roosting in surrounding trees and foraging were negligible however notes potential opportunities for low numbers of nesting birds and makes recommendation for precautionary measures such as tree and vegetation clearance to occur outside of nesting season, pre-clearance inspections, and cease work buffers if active nests are found.

330. Furthermore, the proposed development includes the implementation of native tree planting and wildlife friendly planting as well as green walls and roof, and the installation of artificial nesting and roosting boxes which will enhance the biodiversity of the site.

331. Overall, given the low or negligible ecological importance of the site, the Appraisal concludes that no significant impacts to designated habitats or priority habitats will occur as a consequence of the redevelopment of the site.

Biodiversity

332. Biodiversity Net Gain (BNG) 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. The National requirement is for all developments (unless exempt) to achieve a 10% uplift in biodiversity which must be demonstrated using a statutory metric tool. The 10% net gain is reflected in Southwark Plan Policies. The legislation sets out 3 ways in which the net gain can be achieved. Specifically; (and in order to of priority/preference) the developer should achieve 10% onsite, if this is not possible then offsite credits can be secured and as a final resort statutory credits can be purchased. It is a validation requirement for all applications (unless exempt) to submit the statutory metric and in all scenarios a Biodiversity Gain Plan must be submitted prior to commencement of development (secured by way of a national pre

commencement condition). Compliance with onsite provision, offsite provision or statutory credits should be secured in a s106 agreement.

333. The applicant has submitted a BNG Assessment which uses the mandatory net gain metrics. The proposal would deliver biodiversity gain through the planting of 50 new trees, green roofs, shrubs, grassland, native hedgerow, log and brick piles and a reduction in hardstand area. As a result of these measures the scheme would deliver an increase of 0.32 habitable units. This equates to a net percentage gain of 18.08%, thereby exceeding the 10% net gain required under the Environment Act 2021.

334. Delivery of the habitats proposed will require monitoring and maintenance through the construction phase and implementation of mitigation measures to protect retained existing trees. As such, protection measures and delivery and maintenance of the habitats will be secured as part a detailed CEMP by way of a condition.

335. Similarly, maintenance of the proposed habitats is required to ensure the habitats maximise their biodiversity potential through the operational phase of the development. To ensure the habitats can maximise their potential, a long term (~30 year) maintenance and management plan will be secured as part of a S106 obligation for the habitats in the public realm and the green roofs associated with the proposed development.

336. Overall, the proposed development would comply with the BNG requirements of the Environment Act 2021.

Fire safety

337. Policy D12 of the London Plan expects all development proposals to achieve the highest standards of fire safety and to this end requires applications to be supported by an independent Fire Strategy, produced by a third party suitably qualified assessor.

338. A Fire Strategy was submitted with the application which included a matrix that assesses the scheme for compliance against the relevant parts of Policy D12 and D5 of the London Plan. Among other things, the Fire Strategy confirms that:

1. Each of general residential units will be designed for a ‘stay-put’ evacuation strategy.
2. In the event of fire in the students units, all occupants of the unit will evacuate the building. The occupants of other student unit areas/ compartments will stay put unless instructed to evacuate by the fire brigade. The student building will be provided with an Evacuation alert system in accordance with BS 8629:2019 to enable fire service to manage evacuation of the building if necessary.
3. All commercial units accessed independently at ground floor level will implement an independent single stage simultaneous evacuation strategy, whereby only the occupants of the non-residential units will evacuate in the event of a fire.

4. All blocks are provided with four passenger lifts which will be designed as dual functional firefighting/evacuation lifts serving all levels. The evacuation lift will open into a dedicated evacuation lift lobby on all storeys.
5. The Fire Service vehicle access route to Skipton House will be via the adjacent streets London Road, Ontario Street and Newington Causeway.
6. Each stair core in the residential cores will be designed as a firefighting shaft, comprising firefighting staircase and a firefighting/evacuation lift lobby containing two dual functional evacuation/firefighting lifts which will be designed to form a minimum 120-minute fire-resisting enclosure.
7. Each firefighting staircase will contain a wet rising fire main with outlet valves provided in the respective lift lobby of each storey (including ground and basement) designed and installed in accordance with BS 9990: 2015.
8. All areas of the floorplate will be located within 60m of the wet riser outlet within the firefighting lobby.
9. Both of the commercial staircases will be provided with a dry rising main with an outlet point located on the full landing of every storey the stair serves (including ground).
10. Smoke ventilation systems, including a 1.0m2 AOV at the head of each staircase, a 1.0m2 AOV in each firefighting/evacuation lift lobby.
11. Common corridor serving apartments and those separating basement ancillary accommodation from the lift lobby/staircase will be provided with a mechanical ventilation system.
12. Sprinklers will be provided throughout each block.
13. The car park is to be provided with a smoke ventilation system in order to clear it of smoke for fire service operations.
14. An EVC system will be provided, comprising outstations in each evacuation lift lobby with a master station at Fire Service access level – designed and installed in accordance with BS 5839-9.

339. The Fire Strategy was produced by fire risk engineering consultancy BB7. The contents of the document have been checked and approved by a certified fire risk engineer (a Member of the Institute of Fire Engineers).

340. The relevant fire risk minimisation policies of the London Plan are deemed to have been satisfied. A condition is recommended to ensure the construction and in-use operation of the building are carried out in accordance with the Fire Strategy.

Secured by Design

341. The application has been reviewed by the Metropolitan Police, Secure by Design Advisor who is satisfied that, should this application proceed, it would be able to achieve the security requirements of the Secured by Design. Conditions are recommended to ensure the development will achieve these requirements.

Archaeology

342. Part D of LP Policy HC1 states that development proposals should identify assets of archaeological significance to inform the design and appropriate mitigation. In addition, SP Policy P23 sets out the requirements for archaeological findings on-site.

343. There are no designated heritage assets on the site however, the eastern half of the Site is located within the Tier 1 North Southwark and Roman Road Archaeological Priority Area (APA). This APA is the largest and most archaeologically significant in Southwark. It is noted from the Archaeological Desk Based Assessment, prepared by MOLA, that while there are potential impacts from the proposed basement works, the excavation of the existing basement beneath Skipton House would have removed all remains within this footprint. The only areas of archaeological survival are small, localised pockets on the edges of the site.

344. Excavation for the proposed basement extension and additional piling in the area would remove any remains only within the extension footprint, in an area identified in the report as having moderate potential for Roman remains. Furthermore, no additional excavation is proposed in the eastern half of the site and therefore the proposed development would not impact the APA. As such, no additional archaeological works are necessary for the site.

345. As confirmed by the Council's Archaeology Officer, the proposal would not result in adverse impacts on any identified archaeological assets and as such, is considered acceptable and recommended for approval subject to recommended conditions.

Transport and highways

Site Context

346. The site benefits from an exceptional level of accessibility to the London public transport network with immediate access to The London Underground (Northern and Bakerloo lines) via the adjacent Bakerloo Line Underground Station, as well as being within easy walking distance of Elephant and Castle National Rail station to the south of the Site. In addition, the site benefits from extensive bus services operating nearby on Newington Causeway and London Road which are both part of the TfL network. The CS7 cycle superhighway is also located to the west of the site and runs along Ontario Street, linking South and Central London. In light of this, the Site has a Public Transport Accessibility Level (PTAL) rating of 6b indicating the highest level of connectivity. The Site is situated within Controlled Parking Zone C2 which operates Monday to Friday 08:30 to 18:30, while the roads to the east of Newington Causeway form part of Controlled Parking Zone D (Newington) and have the same hours and days of operation as that of C2.

Trip generation

347. Policy T4 of the London Plan requires development proposals to ensure the impacts on the capacity of the transport network are fully assessed and that any adverse impacts are mitigated. Policies P45, P49 and P50 of the Southwark Plan require developments to minimise the demand for private car journeys and demonstrate the public transport network has sufficient capacity to support any increase in the number of journeys by the users of the development.

348. The applicant has provided the daily trip generation profile of the proposed development, in addition to peak hour trip generation and a comparison against the trip generation of the consented scheme.

349. A total of 2888 daily trips are forecast to be generated by the proposed residential and student elements of the development, between 07:00 – 19:00 (weekday) and would be undertaken via vehicle, active and public transport modes.

350. The proposed development would result in a net reduction in overall trips in comparison to the consented office led scheme as shown in the table below. Overall, the proposed development would generate 501 fewer trips during the AM peak hour and 417 fewer during the PM peak hours. The proposed development would also result in net reduction in trips across most modes when compared to the consented multi-modal trip generation with the exception of total bus trips (weekday 07:00 – 19:00), accounting for an additional 34 trips which is considered to be minor.

Total Person Trips	AM Peak (08:00 – 09:00)			PM Peak (17:00 – 18:00)			Daily (07:00-19:00)		
	In	Out	Total	In	Out	Total	In	Out	Total
Consented	716	74	790	44	646	690	2609	2564	5173
Proposed	58	228	286	164	111	275	1300	1590	2888
Net Change	**-658**	**154**	**-504**	**120**	**-535**	**-415**	**-1309**	**-974**	**-2285**

Table 6: Net change in total person trips between the consented scheme and proposed development

351. When considering the impact of the proposal on the existing public transport network, the net impact of proposed public transport trips compared to the consented scheme are noted in the table below.

Total Person Trips	AM Peak (08:00 – 09:00)			PM Peak (17:00 – 18:00)		
	In	Out	Total	In	Out	Total
Vehicle Occupants	-4	17	13	12	0	11
Pedestrians	-38	31	-9	26	-23	4
Cyclists	-40	-1	-44	0	-36	-38
Bus	-90	43	-47	39	-60	-22
London Underground	-200	62	-140	39	-166	-128
Mainline Rail	-275	-17	-292	-10	-245	-260
Other	2	9	10	5	2	7
Total	**-645**	**144**	**-501**	**111**	**-528**	**-417**

Table 7: Net change in public transport trips across mode between consented scheme and proposed development

352. With regards to the proposed flexible Class E spaces, it is noted that those at the ground floor are likely to accommodate commercial retail or food and beverage occupiers. These units are unlikely to be a destination in its own right, and as such, all trips (other than servicing) are considered 'pass-by' trips and not 'new' to the network. The provision of these uses on-Site would mean that building occupiers (and adjacent building occupiers) would not need to travel to destinations located further to find equivalent facilities.

353. At first and second floor levels, the Class E facilities are likely to be used as office workspace and/or medical services. Office workspaces would attract daily trips to the site, and these would be mostly concentrated in the AM and PM peak hours, and have the potential to be from across a relatively wide area, which would include travel by tube, rail and bus. In contrast, medical services are likely to attract trips from local residents, including residents within the proposed development. Medical services will attract some commuting trips, but this is anticipated to be lower than commuting trips attracted by office use of the same area. Therefore, it is anticipated that overall office use will have a greater impact in terms of trip generation, especially during network peak hours.

354. The trip generation from the proposed office use is illustrated in the table below. When considered alongside the combined residential and PBSA trip generation and compared against the trip generation of the consented scheme the proposed impacts on the existing network are considered to minor.

Total Person Trips	AM Peak (08:00 – 09:00)			PM Peak (17:00 – 18:00)		
	In	Out	Total	In	Out	Total
Vehicle Occupants	0	0	0	0	0	0
Pedestrians	1	0	1	0	1	1
Cyclists	1	0	1	0	1	1
Bus	8	1	8	1	8	9
London Underground	10	1	11	1	10	11
Mainline Rail	4	0	4	0	4	4
Other	0	0	0	0	0	0
Total	**24**	**2**	**26**	**2**	**25**	**27**

Table 8: Proposed Office Multi-modal Trip Generation

355. Overall, the proposed development would offer an improvement in terms of public transport trips and therefore, it is considered the public transport network surrounding the site is sufficient to accommodate the demand generated by the proposed development.

Student move-ins and move-outs

356. Students moving in and out of PBSA can generate a significant demand for loading space nearby. It is noted that given the highly accessible location, majority of arrivals at the Site will likely be via the public transport connections available. Nevertheless, a capacity assessment has been undertaken to

demonstrate that the proposed development has been designed to effectively manage the arrival of students. It is proposed that four home delivery bays in the basement of the development will be used by vehicles arriving at the Site to load and unload during move-in/out periods. The procedure for managing student arrival and departure periods at the start and end of term will also be set out within a standalone Student Management Plan to be secured by obligation, and this will be expected to align with the principles in the application-stage documents.

357. The key elements proposed at this stage within respect to move-ins are:

1. For students that insist on driving, they will be required to book a timed slot to guarantee a parking space. Students would be provided with a maximum occupancy time on-site of 30-minutes.
2. Key collection will be staggered to manage demand and prevent overcrowding at the Site.
3. Welcome packs sent to prospective students in advance of moving in would advise all students to travel by public transport. Information about public transport accessibility will be provided, and because students are unlikely to travel with high levels of luggage (due to the extent of the facilities provided and the limited storage space), travel by public transport should be possible for the majority of future Site residents.

Those that travel to the Site by car, the information pack would recommend using potential park and ride locations, such as Surrey Quays, where parking is available close to the public transport network and the journey time to Elephant and Castle is less than 30 minutes. Alternative park and ride locations will also be recommended, such as Horizon Parking Wembley Central (230 spaces close to the Bakerloo Line).

358. The results of the capacity assessment and the key elements above are summarised in the table below. In total, there is identified capacity for 96 students to be dropped off by vehicle, over a 12-hour day, in line with the management strategy, whereby timed slots would be allocated across four bays in the basement. Based on modelling from other student schemes, typically, about 30% arrive during the opening weekend with the balance then arriving over a subsequent period of 2 to 3 weeks. It is anticipated that the proposed development will follow this pattern and as such, the capacity is considered sufficient given the majority of students would be anticipated to arrive via public transport.

359. Overall it is considered that the anticipated trips generated by the student component of the proposed development would be modest and that these would be adequately managed by the standalone Student Management Plan such that no harm would be caused to the local highway network or surrounding residential amenity. The proposed obligation relating to the standalone Student Management Plan will be worded to expressly require inclusion of measures in respect of the move in and move-out process.

Servicing and deliveries

360. London Plan Policy T7 deals with servicing and delivery arrangements during construction and end use. With respect to end use, the policy requires provision of adequate space for servicing, storage and deliveries to be made off-street, with on-street loading bays only used where this is not possible.

Servicing/delivery trip generation

361. The applicant's Transport Assessment predicts a total of 153 two-way daily delivery and servicing vehicle trips to be generated during daytime hours (07:00 – 19:00) on a typical weekday. This would account for approximately 65 servicing and delivery movements for the PBSA, 52 movements for the residential housing and 36 movements for the commercial units. It is noted that the proposed development is not expected to attract many large rigid vehicles with this accounting for 1 vehicle being serviced from the basement and all other trips projected to be motorcycles, cycle couriers, cars or light goods vans. These estimates are considered to be realistic and these numbers would neither place undue strain on the highway network nor impact upon the amenity of nearby residential occupiers. Furthermore, deliveries for the proposed commercial units will be scheduled to avoid peak hours with servicing trips at Ontario Street restricted to 07:00-09:30 and 17:00-19:00. In addition, a Delivery, Servicing and Waste Management Plan will be secured via a S106 agreement.

Car parking

362. The proposed development would be largely car free with the exception 3 blue badge spaces which are proposed at basement level. As the site is in PTAL 6b, with excellent connectivity, the proposed car-free development is acceptable and in line with the London Plan.

363. The London Plan Policy T6 and Southwark Plan Policy P54 requires a minimum 3% provision of blue badge parking spaces. The 3 blue badge parking spaces proposed equate to 1.2% of the residential dwellings. Whilst below the London Plan requirement, this is an uplift on the consented scheme and is acceptable given the excellent accessibility of the site and subject to improvements to step-free access delivered as part of the s278/s106 agreements. It is considered that the quantum of parking proposed is appropriate to serve the requirements of a site of this scale in this location in Central London and would comply with London Plan Policy T6.

364. The development does not include the provision of EVCPs within the basement car park due to fire risk and the need for the area to be fully sprinklered. It is understood that this requirement entails the installation of a large High Hazard water tank, necessitating substantial water storage. The excavation required to accommodate the High Hazard tank would demand an increase to the basement volume, with an associated increase of life cycle carbon. Given these considerations, the infrastructure changes required are significant and the carbon emissions associated with these changes result in a development with a significantly worse level of life cycle carbon. It is also noted that the additional basement dig required for the sprinkler tank needed would potentially impact

London Underground infrastructure and tube lines. As such, the development includes a financial contribution toward funding local on-street EVCPs on Keyworth Street; which is considered positive in supporting the Council's sustainable development objectives.

365. As per Southwark Plan Policy P54, on-street parking permits will not be available for residents, students or businesses. However, in line with Policy 54, car club membership will be offered to all eligible residents of the affordable residential units. Overall, this is considered acceptable in terms of reducing private car usage and promoting multi-modal forms of transport.

Cycle parking and cycling facilities

366. The proposed development would comply with the cycle parking standards prescribed under the London Plan which require 1,076 cycle spaces for the student accommodation, 448 long stay cycle parking spaces for the residential homes, and 17 cycle spaces for the flexible Class E uses.

367. The development would also provide 60 short-stay cycle parking spaces. The number of spaces has been improved and more appropriate locations identified since the submission of the planning application. However, the quantum of spaces would represent a shortfall of 22 spaces versus the London Plan policy-compliant level. As such, the proposed short-stay cycle parking provision is acceptable on the basis of a financial contribution being provided to TfL for increased cycle hire provision/capacity and to LBS to provide additional Sheffield stands within the vicinity of the site (if appropriate space/locations can be identified); which will be secured in the s106 Agreement.

368. The proposed cycle parking comprises a mix of tiered spaces, single and double racks, Sheffield stands and accessible stands. Long stay cycle stores for the student component are located on first, second the third floors of the student building, accessible via two lifts, while all residential cycle parking would be located in the basement level. Short stay visitor cycle parking is provided within the proposed new public realm, around the periphery of the development, along Ontario Street, London Road and Newington Causeway.

369. Detailed plans have been provided regarding the proposed cycle store layouts. While generally acceptable, cycle store layouts including relevant dimensions demonstrating minimum clearance heights, aisle widths, stand specifications, accessible clearances as well as details regarding lighting and weatherproof will need to be provided as part of a detailed cycle parking plan. A condition is therefore recommended for an updated cycle store layout plan to be provided which demonstrates compliance with the relevant cycle parking specifications.

Active Travel Zone

370. The Council are in currently in the process of designing a series of walking, cycling and bus improvements along Newington Causeway. This scheme is one of the key strategic transport improvements that the Council are seeking to deliver in this part of the Borough. Given the potential impact of the development proposals in terms of additional walking, cycling and public

transport trips, a S106 contribution of £510,375 will be sought from the developer towards the delivery of active and sustainable transport improvements on Newington Causeway. This has been calculated on the basis on £250 per student room and £625 per residential unit proposed which is commensurate with other approved student-led developments in the Borough and will be secured as part of the s106 Agreement.

Conclusion on Transport and Highways

371. The scheme would minimise vehicle movements by prioritising use of public transport, walking and cycling, ensuring deliveries are undertaken by primarily cars, motorcycles and LGV's, rather than HGV's and by encouraging consolidation of deliveries. The increased activity of the site is not considered to give rise to any adverse impacts on the surrounding area and the proposals are considered to be acceptable in transport and highways terms.

Environmental matters

Construction management

372. The proposed development includes demolition works to the ground and basement therefore will be subject a construction environmental management plan (CEMP) and demolition environmental management plan (DEMP). No development shall take place, including any works of demolition, until a written CEMP / DEMP has been submitted to and approved in writing by the Local Planning Authority. The CEMP / DEMP 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.

Waste Management

373. The 243 residential units are estimated to generate a total of 39,980 L of waste per week, with storage designed to cater for 125% of total waste arisings in the form of mixed recyclables (50%) and residual waste (75%). This equates to 47 x 1,100 L Eurobins provided in two waste storage areas located at the basement level. The 1434 student units are estimated at 100,380 L of waste generation per week, managed through two waste storage areas located at the basement level and containing 54 x 1,100L Eurobins. Waste for the PBSA units has been designed to accommodate a 50%/50% split between the two waste streams and waste arisings based on a fortnightly collection service by a private waste contractor.

374. Both residential and student waste storage areas have been designed to be easily accessible from the adjacent lift cores and the platform lift to allow Building Management to move bins from the basement area to the ground floor level, prior to collection. In addition, each bin store has been designed to cater for temporary storage of bulky waste and/or other recycling waste streams.

375. With regard to commercial waste, given this would vary depending on various occupiers, waste arisings have been estimated for café, food retail, non-food

retail and office uses, totalling 55,812 L of waste per week. The proposed development includes a waste storage area at the ground floor level to accommodate 10 x 1,100L Eurobins to support commercial waste collection on a daily basis by a private waste contractor.

376. Plans have been provided which demonstrate that a 26-tonne waste collection vehicle can reverse into the loading bay at ground level, accessible from Ontario Street, and exist in a forward gear. Sufficient waste storage areas for recycling, residual and food waste have been provided for residential and commercial uses with sufficient drag distances and access arrangements via the basement waste store and ground level collection store. It is noted that the collection of PBSA waste would be scheduled on days that residential waste would not be collected. PBSA and residential waste would not, therefore, be present in the ground floor storage area at the same time.

377. Overall, sufficient waste storage and appropriate management would be provided in accordance with the requirements of the development plan and relevant guidance. The measures and strategies set out in the draft waste management plan are considered generally acceptable and compliance with a detailed operational waste management plan will be securing by way of condition.

Water resources

378. Thames Water have identified that some capacity exists within the water network to serve the first 75 dwellings but beyond that upgrade to the water network will be required. Works are ongoing to determine the details of the capacity requirements and upgrade works and therefore, Thames water have recommended a condition to ensure the development does not out pace the delivery of the essential infrastructure. Given Thames Water are working with the developer to identify and deliver the off site water infrastructure needs to serve the development, it is considered that this would not preclude determination of the Application subject to this recommended condition being included in any decision. Thames Water have in their comments also recommended standard conditions and informatives relating to foul water, surface water, piling, ground water discharges, sewage flooding, proximity to assets and surface water drainage which have been attached accordingly.

Flood risk and drainage

379. The Application Site is located within Flood Risk Zone 3A and the main source of flood risk in Southwark is as a result of tidal activity within the River Thames. It should be noted that the site benefits from protection by the Thames Barrier which provides a standard of protection of 0.1% in any given year (1 in 1000-year level of protection).

380. The site is located in Flood Zone 3 as identified by the Environment Agency flood map, which indicates a high probability of flooding. Paragraph 170 of the NPPF advises that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether

existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. In line with the NPPF, the Council has a 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.

381. Paragraph 178 of the NPPF states 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 development does not contain any ground floor residential accommodation which are classified as 'more vulnerable' uses under the NPPF.

Sequential Test

382. The NPPF states that where a development proposal is in accordance with an allocation made in the Southwark Plan's Strategic Flood Risk Assessment (which set out the Sequential and Exception Tests), it is not necessary to repeat the Exception Test. This applies provided:

1. the proposed development is consistent with the use for which it was allocated
2. there have been no significant changes to the known level of flood risk to the site, now or in the future which would have affected the outcome of the test.

383. The aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding. Development should not be permitted if there are reasonably available sites appropriate for development in areas at a lower risk of flooding. The proposed development is located in Flood Zone 3a, and is not allocated under the Local Plan therefore, it is required to undergo a Sequential Test.

384. The Site is located within the Elephant and Castle Opportunity Area and will serve as the last piece in the jigsaw for regeneration around the Elephant and Castle gyratory and broader area. While the scheme does propose a basement extension, it would largely rely on the existing basement. The basement impact assessment demonstrates that it would have a negligible impact on groundwater flooding risk, surface water flow and flooding. All habitable rooms and more vulnerable uses would be above ground floor level. As such, it is deemed that the site has passed the Sequential Test.

Exception Test

385. As the proposed development includes residential dwellings and student accommodation, the proposed development has a vulnerability classification of "more vulnerable" according to Annex 3 of the NFPP's vulnerability classification guidance. 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.

386. The site is located on previously developed land and there are strong sustainability reasons why it should be redeveloped. The development of brownfield sites such as this will be necessary if accommodation is to be provided to meet the current shortfall in housing in the area. The site is allocated for mixed-use development including housing in the Southwark Plan, and the proposed design is capable of providing good quality housing and a wider sustainability benefit to the community by introducing new commercial, medical and public realm spaces. In addition, the proposed buildings have been designed to be highly sustainable with a BREEAM Excellent targeted.

387. The issue of water resources has been considered as part of the ES and the results are set out in Chapter 11 of the main document, and subsequent updated within the ES Addendum. This assessment considered the impact of the development with regards to water resources, water quality, flood risk and drainage. The assessment looked at potential significant effects that could arise during demolition/construction and the operational phase of the development with regards to surface water drainage, flood risk, surface water quality and surface water/foul sewage capacity.

388. A site-specific Flood Risk Assessment and SUDS (Sustainable Urban Drainage) Strategy has been submitted with the application. The proposed SuDS has been designed for the whole lifetime of the building up to the 1 in 100 year + 40% Climate Change rainfall event, as well as flood resistant design measures. Surface water attenuation will be provided through variety of measures such as green infrastructure which have been designed to restrict the site discharge rate to 16.7l/s for the 1 in 100-year storm event, representing a betterment rate of 81% from the existing condition. Given the overall reduction in the site discharge rate, the development is considered to be safe and will not increase the flood risk elsewhere. With regard to river and tidal flooding, the FRA advises that the risk to the site is low owing to the flood defences on the River Thames.

389. The Environment Agency and Thames Water have been consulted on the proposed development and have recommended conditions that would be required to be discharged prior to the commencement of any development (with the exception of demolition). Alongside a condition for a Demolition and Construction Environmental Management Plan, these conditions would control impacts during this phase of development and would assist in mitigating/controlling any impacts. As noted previously in this report, Thames Water have stated that off-site upgrade works will be required to accommodate the development and have recommended a condition to ensure the development does not out pace the delivery of the essential infrastructure.

390. The flood risk assessment prepared by Expedition has been reviewed by the Council's Flood Risk Officer and found to be acceptable subject to standard conditions regarding drainage strategy and verification report being submitted and approved in writing by the Council. As such, it is considered that the Proposed Development would have an acceptable impact with regard to flood risk and drainage.

Land contamination

391. A Phase 1 Land Contamination Assessment Report, prepared by A-squared Studio Environmental was submitted as part of the Application and details the historic land uses on the site and in the wider vicinity as well as providing a study of available records. Based on this research, the report concludes that unacceptable risks have been identified with respect to human health (on-site and off-site), buildings / structure (on-site and off-site), and controlled waters (groundwater). It goes on to recommend that appropriately targeted ground investigation is undertaken for geo-environmental purposes to enable a refinement of the CSM and geo-environmental assessments for the specifically identified unacceptable risks.

392. The report was reviewed by the Council's EPT Officer who recommended that an intrusive phase 2 report be prepared prior to commencement of the development to fully characterise the nature and extent of any contamination of soils and ground water on the site and provide a remediation strategy if required. It is therefore recommended that further contamination investigation and risk assessment be undertaken for the site and secured as part of any future planning consent.

Air quality

393. The application was accompanied by an Air Quality Report, prepared by TRIUM which confirms that the proposed development, during construction, operation and cumulatively, will have negligible impacts upon the local area. This is primarily due to the development being car-free and having a full electric energy strategy which result in the Proposed Development being air quality positive in terms of both building and transport related emissions.

394. Whilst it is noted that dust emissions associated with the construction and track out phases of the Proposed Development are identified as 'high risk' at the worst affected receptors a range of appropriate site specific mitigation measures have been proposed. It is anticipated that with these appropriate mitigation measures in place, the risk of adverse effects due to dust emissions from the construction and track out phases which will be short term, will not be significant. The proposed mitigation measures will be secured by way of condition and as such, the air quality effects are considered to be compliant with all regulatory standards.

395. An updated Air Quality Positive Statement (AQ Statement), prepared by Tetra Tech was also submitted which provided further details regarding travel plan measures, ventilation strategy, energy strategy and construction. The updated AQ Statement confirmed that the Proposed Development would be Air Quality Positive as it will not have a negative impact on the receiving environment with respect to air quality and is anticipated to improve air quality levels as a result of the implementation of the combination of proposed measures. This was reviewed by the Council's Environmental Protection Officer who accepted the proposed measures contained in the updated AQ Statement would be sufficient to achieve an air quality positive development.

396. Overall, the application is in accordance with Policy SI1 of the London Plan and Policy P65 of the Local Plan in ensuring London's air quality standards are maintained. Any short-term effects on air quality during construction will be successfully mitigated through the CEMP and the operational stage will meet air quality positive.

Wind and microclimate

397. Wind microclimate has been considered as part of the ES and the results are set out in Chapter 10 as well as within the ES addendum. The assessments seek to understand whether any undesirable wind conditions would be created on site or within the surrounding area as a result of the proposed development. It considers if the resultant wind speed changes would be suitable for the intended use of specific locations around and within the site in terms of comfort and safety. The following configurations have been tested:

1. Configuration 1: The Existing Site with Existing Surrounding Buildings (Baseline Scenario);
2. Configuration 2: The Proposed Development with Existing Surrounding Buildings; and
3. Configuration 3: The Proposed Development with Cumulative Surrounding Buildings.

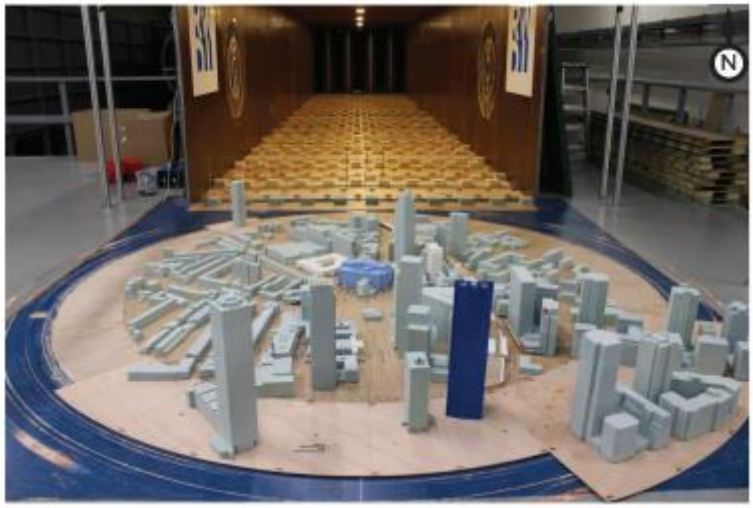


Image 56: The Existing Site with Existing Surrounding Buildings (Configuration 1) – view of the model (from the south)



Image 57: The Proposed Development with Existing Surrounding Buildings (Configuration 2) – view of the model (from the south)



Image 58: The Proposed Development with Cumulative Surrounding Buildings (Configuration 3) – view of the model (from the south)

398. Prevailing winds throughout the year are from the south west albeit with some secondary north easterly winds during late spring and early summer. During enabling works, demolition and construction, wind conditions would be changeable due to the changing and evolving nature of the site and would gradually adjust to those of the completed development. Once completed, the majority of areas around the site would have wind conditions suitable for their intended use however, the following areas would require mitigation to improve wind conditions:

    1. Strolling conditions at the terrace (measurement location 108) would be one category windier than suitable for the intended use (outdoor seating and playspace), representing a Minor Adverse (significant) effect.
    2. Standing conditions at the café seating provisions to the east (measurement location 54) would be one category windier than suitable

for the intended use and one category windier than that in baseline, representing a Minor Adverse (significant) effect.

3. Strolling conditions at the bus stop to the south of the Proposed Development (measurement location 91) would be one category windier than suitable for the intended use and one category windier than that in Configuration, representing a Minor Adverse (significant) effect.

399. Various methods of mitigation are proposed to ensure that the areas identified above would have wind conditions suitable for their intended use and will be secured as part of any development consent. For the terrace on Block 1B, these measures include planting of trees to a height of 4-4.5m to provide beneficial shelter to the playspace, installation of pergola structures with vertical climbing planters and locating seating areas within the proposed pergolas to provide further shelter. In terms of the bus stop to the south of the site and the café to the east, existing landscaping and localised measures such as canopies and low-level screening of these areas have been identified as suitable mitigation for providing shelter and achieving suitable wind conditions.

400. An assessment of the London College of Communication Site (Application Ref: 24/AP/2468) to the south has been provided as part of the Applicant's wind microclimate study. Given the distance and the location of this scheme (located in the prevailing south westerly direction) it is likely that buildings which are approximately 21, 24 and 35 storeys in height, would provide some shelter to the Proposed Development from the prevailing winds. However, it is expected that the wind conditions at and around the Proposed Development would remain materially to the same to that reported for Configuration 3 when this scheme comes forward.

401. Overall, it is considered that with appropriate mitigation in place, wind conditions on and surrounding the Development Site would be appropriate for the intended use throughout the year. There would be no instances of safety concerns for more vulnerable users such as pedestrians or cyclists either in the context of the existing and cumulative buildings. The development is therefore considered to be acceptable in terms of impacts on wind and microclimate and would address the requirements of Policy D6 of the London Plan and Policy P14, P17 and P56 of the Local Plan by ensuring adequate a comfortable microclimate.

Energy and sustainability

Whole life cycle and carbon capture

402. As part of the submission, a Whole Life Carbon Assessment (WLCA) prepared by Expedition has been undertaken which demonstrates that the proposed upfront embodied carbon for the Proposed Development estimated to be 710kgCO2e/m2. The proposed embodied carbons make 69% of the whole life emissions of the development which would outperform the GLA's embodied carbon benchmark and is on track to improve on the aspirational benchmark of 800 kgCO2e/m2. It is noted that the report includes recommended design improvements which provides further opportunities to reduce the embodied carbon of the scheme, and which could be explored at the detailed design stage to reduce the whole life embodies carbon of the scheme to 660kgCO2e/m2.

However, the assessed intensity is a market-leading outcome. Based on a comparison with other buildings of similar massing, this would put the scheme's performance on an equivalence with many mid to high rise schemes currently in planning and under construction.

Circular Economy

403. The Circular Economy Statement submitted with the Application outlines how the Proposed Development will seek to minimise and reduce the waste generated from the scheme and the materials used throughout its life cycle, including the end-of-life stage, as required under LP Policy SI7.

404. The strategic approach and commitment targets of the Application are summarised below:

1. Minimum 95% of non-hazardous demolition, excavation and construction waste materials to be diverted from landfill for reuse, recycling, or recovery
2. Achieve 65% municipal operational waste recycling targets by 2030
3. Exceed 20% of the total value of the selected products and materials to include recycled and reused content
4. To provide a Post-Construction report to the Greater London Authority.

405. Based on the approach and methodology being implemented and monitored during construction and operation, it is considered that the Application would meet LP Policy SI7.

Carbon emission reduction

406. The Proposed Development embodies an ambitious energy and carbon reduction strategy. Through the adoption of innovative and best practice energy reduction measures, the Proposed Development will achieve an overall regulated carbon dioxide emissions of 53% over Part L 2021. In accordance with LP Policy SI2 and SP Policy P70, the shortfall in carbon emissions (5,708 tCO_2) to meet net zero will be met by an off-site payment in-lieu. The CO2 emissions offset cost is currently set at £95/tCO_2 over a period of 30 years. Therefore, the estimated carbon offset payment for the Proposed Development is £542,260.

Be Lean (use less energy)

407. The Proposed Development has been designed to reduce CO_2 emissions from the site beyond the standard required by Building Regulations Part L 2021 through fabric and energy efficiency measures as well as low and zero carbon energy supply options.

408. The Site is currently shaded by several surrounding buildings which has been factored into the design response when considering daylight and energy consumption. Passive design measures have been incorporated into the proposed development, for both residential and non-residential components, including:

1. Optimised glazing ratios on façade, seeking to maximise daylight and useful solar gain, help mitigate overheating risk and minimise heat loss. (Circa 22% internal glazing ratio).
2. Solar control and obscured glazing used to limit solar gain which contributes to good internal daylight, therefore reducing artificial lighting.
3. Glazing systems mounted in the insulation layer of the façade to limit thermal bridging around the frame, as part of the curtain walling system
4. Precast panels fabricated with built-in insultation layers, creating high energy-efficient building envelope with good thermal resistance and minimised air leakage.
5. Use of exposed concrete slabs in amenity spaces provides high thermal mass to moderate cooling loads.
6. Openable windows to enable effective natural ventilation and a passive cooling strategy.
7. Shading features reducing solar gain in summer.
8. False ceilings to reduce volume of air needed heating/cooling and help maintain a more stable internal temperature.
9. Inset and outset balconies for natural shading to adjacent windows and lower floors, reducing solar gains.
10. High levels of thermal insulation for opaque elements, reducing heat loss.
11. Thermal bridging mitigated wherever possible to limit heat loss.
12. High level of airtightness, reducing heat loss and mitigating drafts

409. The Proposed Development also employs active design measures to limit energy use / reduce heat loss including the use of low energy LED lighting throughout, lighting control systems to detect occupants and switch off lighting when not required, lighting control systems to detect daylight levels and control the artificial lighting output, mechanical Ventilation with Heat Recovery (MVHR) providing constant fresh air whilst preheating incoming air with outgoing warm air, and space cooling for the amenity and Class E spaces provided by highly efficient plant.

410. Overall, an estimated reduction in CO_2 emissions of 56 tCO_2/yr for the domestic elements of the scheme, and 30.8 tCO_2/yr for the non-domestic elements are projected. These reductions equate to a domestic 'Be Lean' CO_2 emission saving of 28%, and a non-domestic 'Be Lean' CO_2 emission saving of 15%. The total development wide saving is 21% which is in line with the domestic Be Lean target.

Be Clean (supply energy efficiently)

411. The development follows the heating hierarchy prescribed under Southwark Plan Policy P70 which outlines major developments must be designed to connect to existing energy networks, or if no existing schemes exist, investigate whether such networks are planned in the area and designing systems with the flexibility to connect to these in the future.

412. There are no existing or proposed district energy networks in the local area for connection at Day One. However, it is noted discussion are ongoing between the Developer and an existing energy centre - 'Heygate' under the ownership of E.ON Energy which is within close proximity of the Proposed Development. As

part of the ongoing negotiations with E.ON, the Proposed Development has been designed to be 'connection ready', ensuring the necessary infrastructure is in place for a future connection to a district heating network, if one becomes viable. In this regard, the proposed design includes allowance for a dedicated min 50sqm plant room at basement level to facilitate a future connection.

Be Green (Use low or carbon zero energy)

413. The Proposed Development has been designed to accommodate 2017.9m^2 of roof mounted Photovoltaic (PV) panels (approximately 90 PV panels) on the North 1A and 2A blocks. The maximum available area of roof space, which are not green roofs, plant equipment, access or play space, will be dedicated to on-site energy generation. The performance and output of the system will be monitored, in line with the be seen policy and relevant guidance document. Overall, the proposed PV array will account for an estimated annual generation of 41.79 kWh/m^2 and an annual carbon emissions savings of 5.01tCO_2.

414. The Proposed Development will also utilise heat pumps, consisting of a vapour compression cycle, and reverse cycle technology to produce either heating or cooling. It is noted that air source heat pumps and water-to-water heat pumps have been incorporated over ground source heat pumps (GSHP) due to the scheme retaining the existing basement construction and limitations with the enabling the infrastructure for GSHP.

415. Overall, the Proposed Development will achieve an estimated 50% emissions saving at the ‘Be Green’ stage and a total carbon savings of 77% for the domestic element which aligns with the London Plan's target for residential developments to achieve a minimum overall reduction of 35% beyond the Part L 2021 baseline. An estimated 15% emissions savings at the ‘Be Green’ stage for the non-domestic element is projected, accounting for a total cumulative savings of 30%. While the non-domestic element of the Proposed Development does not meet the London Plan's target, it is considered that the proposed scheme has clearly demonstrated it has followed the energy hierarchy to maximise carbon savings opportunities before offsetting is considered. Therefore, a 30% reduction in carbon emissions for this element is considered acceptable.

Be Seen (Monitor and review)

416. The Energy Use Intensity (EUI) and space heating demand have been calculated for the domestic and non-domestic areas of the Proposed Development. SAP methodology was applied to the domestic areas, while IES VE modelling was used for non-domestic areas.

417. The GLA’s “be seen” reporting spreadsheet has been provided with the application. The Proposed Development will include building management systems and a metering strategy to control and monitor operational energy performance, to allow reporting on services and metering of both blocks. A planning obligation would secure the ongoing monitoring and reporting requirements, to comply with policy SI2 part A.4.

Overheating

418. The risk of overheating has been assessed throughout the development, in both residential and non-residential areas, in line with the requirements of the GLA. Overheating risk has been mitigated through a range of cooling design features including low energy lighting, low air permeability, communal pipework, optimised glazing, solar control glazing, openable windows, cross ventilation and use of MVHRs.

419. In summary, the overheating reports demonstrates that for both residential and student accommodation, all units are able to achieve a 100% pass rate, complying with Part O. Once the site constraints are considered, the most practical mitigation measure for the current design is the introduction of tempering units to the occupied rooms. An overheating assessment was also undertaken for the non-domestic areas (Class E and amenity spaces) of the Proposed Development, indicating that 100% of these spaces would also achieve compliance. As such, the Cooling Hierarchy set out under LP Policy SI4 has been followed as part of the design of the proposed development to minimise the operation carbon of the cooling systems.

BREEAM

420. Policy P69 of the Southwark Plan states that non-residential development must achieve a BREEAM rating of 'Excellent'. The applicant's BREEAM assessment indicates that the proposed development has been designed to achieve a rating of 'excellent' which meets minimum policy requirements. A planning condition is recommended to secure this.

Digital connectivity infrastructure

421. London Plan Policy SI6 introduces the need for new developments to address London's requirements for enhanced digital connectivity. The policy requires development proposals to ensure that sufficient ducting space for full fibre connectivity infrastructure is provided to all end users, to meet expected demand for mobile connectivity generated by the development, to take appropriate measures to avoid reducing mobile connectivity in surrounding areas, and to support the effective use of rooftops and the public realm (such as street furniture and bins) to accommodate well-designed and suitably located mobile digital infrastructure. This is repeated through policy P44 of the Southwark Plan 'Broadband and digital infrastructure'.

422. A consultation response has been received by Southwark's CCTV team which outlines that the proposed buildings would impact the Council's owned CCTV radio network between Perronet House and Redman House and that redesign of the existing radio network will be necessary to alter the existing lines-of-sights on which the current system operates to ensure that camera transmission is maintained throughout the development works.

423. As such, the CCTV team have requested contributions towards the relocation and alterations to existing equipment in order to ensure that the CCTV

connectivity would be retained. These have been agreed and will be included within the s106 agreement.

424. In order to ensure that the development would meet the requirements of providing improved digital connectivity, a condition is recommended to ensure that the appropriate ducting for future connection to the full fibre infrastructure would be installed within the proposed development.

Planning obligations (S.106 agreement)

425. Policy IP3 of the Southwark Plan and Policy 8.2 of the London Plan advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. Policy IP3 of the Southwark Plan is reinforced by the Section 106 Planning Obligations 2015 SPD, which sets out in detail the type of development that qualifies for planning obligations. Strategic Policy 14 'Implementation and delivery' of the Core Strategy states that planning obligations will be sought to reduce or mitigate the impact of developments. The NPPF echoes the Community Infrastructure Levy Regulation 122 which requires obligations be:

1. necessary to make the development acceptable in planning terms;
2. directly related to the development; and
3. fairly and reasonably related in scale and kind to the development

426. Following the adoption of Southwark's Community Infrastructure Levy (SCIL) on 1 April 2015, much of the historical toolkit obligations such as Education and Strategic Transport have been replaced by SCIL. Only defined site-specific mitigation that meets the tests in Regulation 122 can be given weight. The obligations that meet the Regulation 122 tests and have been agreed are below.

Planning Obligation	Mitigation	Applicant Position
Student Management Plan	To deal with management of students on site and potential disturbances off site.	Agreed
Affordable housing	243 homes (957 habitable rooms – 40.03% of total) to be provided on-site as affordable housing. Tenure split: 28.4% Social Rent and 11.6% Intermediate 100% of the affordable units to be made available before any of the PBSA units can be occupied.	Agreed
Affordable housing monitoring	On-going reporting requirements on the delivery of the affordable housing.	Agreed

	Financial contribution for the monitoring of the affordable housing provision on site. £150 per affordable home = £36,450	
Wheelchair Accessible Housing	To secure marketing of the wheelchair units, in listed locations, and to prevent occupation of wheelchair units by non-wheelchair users until the marketing has been demonstrated to approved. Level of fit out for the social rent wheelchair units to be secured.	Agreed
Play Space Contribution	Shortfall of 816 sqm 1. 2024 SPD: 816 x £598 = £487,968	Agreed
Energy statement and carbon offset financial payment	Secure agreed carbon target (uplift over Part L). Secure futureproofed connection to DHN. Energy schedule (standard wording). Secure carbon off-set contribution payment of £542,280.00	Agreed
Be Seen – on-going monitoring and post-installation review	Post-construction monitoring and reporting of each block.	Agreed
Cycle Hire Docking Station Contribution	TBC Contribution to be paid to the council and to be given by the Council to TfL to enable TfL to provide, extend and/or maintain (as appropriate) the TfL Cycle Hire Docking Station. To provide annual membership to the cycle hire scheme for every residential unit for 2 years from first occupation of that unit.	Agreed in principle subject to confirmation of cost from TfL
Delivery and Servicing plan,	Delivery and servicing plan - to submit delivery and servicing plan	Agreed

monitoring and bond	prior to occupation, to secure a monitoring plan, monitoring fee of £2,790, and comply with that for the monitoring period.	
Public Open Space contribution	1. Public access to the children's playspace to be delivered within the public realm at grade level. 2. Maintenance arrangements. 3. Submit a delivery strategy for approval to set out the phased delivery of the public realm across the site. 4. 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.	Agreed
CPZ Parking Permit Restriction	CPZ parking permit restriction for residential units and commercial floorspace (unless a blue badge holder).	Agreed
Car Parking	Funding for on-street charging points in place of EVCPs within the basement car park. £18,471.34 for a dual EVCP on Keyworth Street.	Agreed
Car Club Membership	Car Club provision and 3-years free Membership for the first occupant of each affordable residential unit.	Agreed
Travel Plan	A contribution of £2,790 towards the monitoring of the travel plan per phase.	Agreed
Active Travel Zone	ATZ improvements to the local walking and cycling networks.	Agreed

	This has been calculated on the basis on £200.20 per student room. £287,082.10 towards the delivery of active and sustainable transport improvements on Newington Causeway.	
S278/S38 for wider public realm works	Not to implement the development until the S278 Highway Works Specification has been submitted and approved by the council. Not to commence the highway works until entering into the S278 Highway Agreement has been entered into with the Council. Not to occupy the development until the |S278 Highway Works approved have been completed to the reasonable satisfaction of the council.	Agreed
Demolition and construction management plan	Not to carry out any work of demolition until the Demolition Environmental Management Plan has been submitted to the Council and the Council has approved the management plan (in consultation with TfL). Not to implement the development until the Construction Environmental Management Plan (CEMP) has been submitted to the Council and the Council has approved the management plan (in consultation with TfL). The applicant has also agreed to pay a sum of £50,000 to the Council's EPT/Highways Network Management to fund their work in monitoring adherence to the CEMP through the demolition and construction phases.	Agreed
Construction phase jobs / skills and	Provide 175 sustained jobs to unemployed Southwark residents, 175 short courses, and take on 43	Agreed

employment requirements	construction industry apprentices during the construction phase, or meet the Employment and Training Contribution. The maximum Employment and Training Contribution is £843,250 (£752,500 against sustained jobs, £26,250 against short courses, and £64,500 against construction industry apprenticeships). Provide a employment, skills and business support plan	
Loss of Employment Floorspace	A loss of employment floorspace contribution of £200,000	Agreed
Affordable Workspace	An affordable workspace contribution of £114,709 based on total affordable workspace floorspace of 968 sq ft and payment of £118 per sq ft.	Agreed
Local procurement	The applicant must allow local businesses to tender for the procurement of goods and services generated by the development both during and after construction.	Agreed
Equal Access	Equal access for all residents, irrespective of the tenure of their dwelling, to all external spaces. Outdoor amenity space and children's playspace is provided free of charge to all residents of the development except for the payment of a reasonable service charge.	Agreed
Estate Management Plan	Submission of an Estate Management Plan which shall set out the ongoing Maintenance and management of all private, non-adopted roads, unadopted shared surfaces and pedestrian and/or cycle routes, within the development. Management and maintenance of SUDs and public toilets.	Agreed

	It shall demonstrate accordance with the Public London Charter.	
Urban Greening Factor	In order to provide off-site mitigation for the UGF shortfall, a review mechanism is to form part of the s106 agreement whereby payment of a financial contribution would only be triggered in the event an UGF score of 0.4 is unable to be achieved. An indicative shortfall of 18 trees has been identified with a financial contribution of £4000 per new tree.	Agreed
Ecology	A monitoring fee of £12,874 to cover the cost of periodic monitoring over 30 years. A Habitat and Management and Monitoring Plan will be required post-approval to set out the management arrangements.	Agreed
Greenfield runoff rates	£366 per cubic metre in the event that greenfield run off rates are not met on site.	Agreed
NHS	£211,026 – to mitigate the impacts of the development on primary care and mental health services.	Agreed
CCTV contribution	1. Contribution towards relocation of the CCTV equipment and two new links on new NPRMs and associated roof infrastructure (Equipment rack with power, switch, cabling and containment) = £46,682.93. 2. Contribution towards increase of CCTV camera for public safety. Budget cost per camera on new pole including UMS, Switch and wireless link = £17,300.00. (Recording per	Agreed

	camera – Pro rata £650 per camera p/a)	
Monitoring Fee	S106 administration and compliance fee to cover costs of monitoring the obligations (with the exception of those that have monitoring contributions already factored in), calculated as £20,000 for large scale major applications	Agreed

427. In the event that an agreement has not been completed by 31 December 2025, the committee is asked to authorise the director of planning and growth to refuse permission, if appropriate, for the following reason:

In the absence of a signed S106 legal agreement there is no mechanism in place to mitigation against the adverse impacts of the development through contributions and it would therefore be contrary to Policy IP3 Planning Obligations of Southwark Plan 2022, Strategic Policy 14 Delivery and Implementation of the Core Strategy (2011) Policy 8.2 Planning Obligations of the London Plan (2016) and the Southwark Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015).

Mayoral and borough community infrastructure levy (CIL)

428. 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.

429. The site is located within Southwark CIL Zone 2, MCIL2 Band 2 Zone. Based on the floor areas provided in the applicant's CIL Form 1 dated 11-Nov-2024 and Accommodation Schedule Rev P1 dated 18-Oct-2024, the gross amount of CIL is £13,415,873.06 (pre-relief). Subject to the correct CIL forms being submitted on time, CIL social housing relief of approximately £5,837,406.13 can be claimed for a number of types of affordable housing. Thus, the resulting CIL amount is estimated to be £7,578,466.93 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.

Community involvement and engagement

430. This application was accompanied by a statement of community involvement (which provides full details of the public consultation). In summary, the document confirms that the following, in-person, public consultation was undertaken by the applicant prior to submission of the application:

1. 27 April 2024 – 1st round of in-person public consultation events showcasing the early plans for the site held at London South Bank University
2. 30 April 2024 – 1st round of in-person public consultation events showcasing the early plans for the site held at London South Bank University
3. 16 July 2024 – Pop-up event outside the site
4. 18 July 2024 – 2nd round of in-person public consultation events showcasing the updated plans for the site held at London South Bank University
5. 20 July 2024 – 2nd round of in-person public consultation events showcasing the updated plans for the site held at London South Bank University

431. A dedicated consultation website was created on 16 April 2024 which provided background on the site, the project team, details of the proposed scheme, explained how to provide feedback and provided details of the public exhibition sessions. In addition, a promotional flyer was delivered to 7442 local residential and commercial addresses surrounding the site, prior to each public consultation event, providing details about the proposal, the dedicated website and the public consultation events. Door knocking was similarly undertaken, prior to each event to promote the public consultation process and hold individual discussions with local residents. Lastly, an e-newsletter was distributed to people who had signed up to the mailing list, sharing details and updates about the scheme and encouraging feedback through the website. A hybrid approach – both online and in person – enabled members of the public to engage in a way that best suited their needs.

432. In addition to the public consultation, key political and community stakeholders' engagement was carried out. This consultation included sending introductory letters to MP's and Councillors as well as various community centres/groups and resident associations. Additional stakeholder meetings were also undertaken with Local Councillors and Community Southwark, Walworth Society and Elephant & Castle Partnership to discuss the ongoing proposal for the site.

433. The applicant provided an engagement summary for the development consultation charter. It details the extent of pre-application consultation and demonstrates that the applicant has made acceptable efforts to engage with those affected by the proposals. 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.

434. 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 from members of the public and local groups

435. Public consultation was initially undertaken on 12/12/2024 and again on 02/07/2025. A total of 1191 neighbours were consulted and at the time of writing, a total of 119 representation (116 objections and 2 in support) had been received.

436. Summarised below are the planning matters raised by members of the public. Further detail on these matters is set out within the relevant sections of this report.

Supporting comments:

Design

1. The scheme features high architectural design.
2. The scale and massing are appropriate for the surrounding context.

Local Regeneration

1. The development will support the regeneration of the area, attracting new residents and businesses while contributing to the local economy.
2. The development will create investment and employment opportunities.

Public benefits

1. The development includes a range of public benefits for the local community and borough.

Objecting comments:

Design

1. Height, bulk, scale and massing unacceptable for the context of the area
2. The 30 storey height of the PBSA towers is excessively tall for the area and would be inappropriate. This is also significantly taller than the previously approved plans for the Site.
3. The TVIA undervalues the area's character and dismisses the significance of open views, notably from Brockwell Park.
4. Overdevelopment of the site and increased density will pose a health and safety risk to current residents, especially from pollution and noise
5. The proposed development has a scale that exceeding any previous development especially with the 1400+ student accommodation
6. Will cause harm to Heritage Assets (Grade II listed building Metro Central Heights and Bakerloo Line Building) and Townscape Views.
7. The construction of high-rise tower blocks may lead to social isolation and a sense of disconnection among residents.

Amenity

1. Construction & operational noise: Prolonged construction noise will impact residents and home-based workers.
2. Increased late-night noise from commercial activities.
3. lack of active frontage on Newington Causeway, compounded by the colonnade design could encourage anti-social behaviours.
4. Obstruction of views and outlook from neighbouring residential buildings
5. Equality concerns – impact to affordable housing residents quality of life and property values.
6. Loss of privacy and overlooking to neighbouring residential properties (in particular MCH and 251 Southwark Bridge Road).
7. Loss of daylight and sunlight and right to light impacts to neighbouring residential properties (in particular MCH and 251 Southwark Bridge Road).
8. The winter gardens at 251 should not be treated as balconies for the purpose of the daylight and sunlight assessment.
9. Increased strain on existing infrastructure (lack of GP surgeries, public transport capacity, and community facilities).

Environmental and Sustainability Issues

1. Risk of flooding to the area has not been considered - the development of the new shopping mall has already caused flooding and many issues.
2. The proposal results in a net loss of greenery and fails to meet the London Plan's Urban Greening Factor.
3. More greenspace and open space should be provided, lack of sufficient landscaping.
4. The proposed towers are likely to cause significant changes to the local wind microclimate.
5. Demolishing the existing structure rather than refurbishing it contradicts sustainability principles particularly in terms of adaptive reuse and embodied carbon reduction.
6. The proposed development offers minimal public benefit or public open space.
7. The Ministry of Sound will be severely adversely impacted by this scheme and will shut down in due course.

Transport

1. The Proposed Development will cause a greater amount of congestion and pollution due to increases in road traffic. Current public transport infrastructure will be unable to cope with the increase in residents from the Skipton House.
2. No provision of parking – especially blue badge parking.
3. Increased footfall due to increased resident will result in further congestion.
4. Will place significant pressures disposal of waste.

Construction impacts

1. Fails to adequately address the noise pollution generated by both the construction process and residents.

2. The construction period, estimated at 3.5 years, will bring significant disruptions including increased traffic, air pollution, and noise.

Other

3. Lack of adequate public consultation – undertaken over Christmas break to limit community engagement.
4. Inadequacies with EIA / non-compliance with planning policy.
5. The development will result in the loss of office space.
6. Impact on Mercato Metrolitano - culture marker of our area and wont survive.
7. No public rooftop garden is provided as per the previously approved scheme.
8. The current scheme neglects opportunities to integrate existing buildings like the Perry Library and Hostel, which could serve as community assets.
9. The proposed development fails to meet the need for a mixed-use neighbourhood.
10. Fails to comply with fire safety requirements.

Viability

11. The scheme has been designed to be uneconomic for a housing association to take on and social units will be turned into full market units.
12. Oversupply of student housing - already high number of student housing developments.
13. Lack of affordable housing offer.
14. The student accommodation will be unaffordable for students based on the developers rental assumptions.

Herne Hill Society

The planning group of the HERNE HILL SOCIETY raised the following objections prior to amended / updated plans being submitted:

15. Proposed development will impact views toward the dome of St. Paul’s Cathedral from Brockwell Park.
16. We do not seek to argue that the loss of the view from Brockwell Park is enough in itself to determine a refusal of the permission. However, we ask that it be considered as a factor together with the many other objections made.
17. It is that height which would be the cause of the loss of the historic view of St Paul's from Brockwell Park.

London South Bank University (LSBU)

Raised the following objections:

18. The daylight, sunlight, overshadowing and solar glare assessment did not take into consideration the existing LSBU properties within the vicinity of the development site.
19. The Keyworth Hostel has also not been considered for assessment.
20. The potential future daylight and sunlight availability from redevelopment of buildings on the campus have not been considered.

Consultation responses from external and statutory consultees

437. 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.

438. GLA - Greater London Authority (Stage 1):

1. Land use principles: The proposals to optimise the site within the prominent and highly accessible Opportunity Area location is supported. The proposal would result in reduced employment floorspace within the CAZ and town centre, however, there appear to be local contextual circumstances to justify this reduction.

2. Affordable housing: We are satisfied that the current affordable housing offer by NIA and tenure split in value terms provides a level of affordable housing which looks to be roughly equivalent to 40% following LB Southwark's Local Plan AH tenure split. We are comfortable that the current scheme meets Fast Track requirements (with grant) and would meet the 40% specified in the Accelerated Funding Route guidance without further conversion of units.

3. Urban design and heritage: The proposal comes forward within an identified tall building location and the scheme design is broadly supported. The proposal would result in harm to the significance of heritage assets including the Westminster World Heritage Site (WHS). The applicant has sought to mitigate the extent of visibility and impacts on the WHS. Exploration of further mitigations is encouraged. It is also considered that the proposal could deliver a compelling package of benefits to be weighed against the identified harm.

4. Transport: The applicant must address comments relating to the strategic transport network, active travel, cycle and car parking and delivery and servicing with further measures secured.

5. Sustainability and environment: Other issues on environment and sustainable infrastructure also require resolution prior to the Mayor’s decision making stage.

Officer response: Points regarding land use and affordable housing are noted. Further information has been submitted by the applicant, which is considered to adequately address the points made regarding urban design and heritage, environment and sustainability and transport. Any information considered outstanding will be secured by way of condition/obligation.

439. HE - Historic England (Heritage): No comments.

Officer response: Noted.

440. ENVA - Environmental Agency: No objection subject to conditions.

Officer response: Noted and to be included as part of any planning permission.

441. Network Rail: No further comments or objections and confirmed that they have no comments to make on daylight, sunlight or solar glare.

Officer response: Noted.

442. HSEFRE - HSE Fire Risk Assessment: 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. However, HSE has identified some matters that the applicant should try to address, in advance of later regulatory stages.

Officer response: Noted and recommended informative to be included as part of any planning permission.

443. London Fire and Emergency Planning Authority: no comments received.

Officer response: Noted.

444. NE - Natural England: No objection.

Officer response: Noted.

445. TW - Thames Water: No objection subject to conditions.

Officer response: Conditions attached accordingly.

446. Transport for London (TfL): provided comments and recommendations regarding cycle parking requirements, construction, bus stop shelter relocation, infrastructure protection and active travel zone.

Officer response: The Council's Transport Team have worked in detail with the Applicant to address these matters which has included the provision of a contribution toward active travel zone improvements. With regard to cycle parking requirements, bus stop relocation and infrastructure protection, these will be secured by condition.

447. Metropolitan Police (Design out crime): No objection subject to conditions.

Officer response: Conditions attached accordingly.

448. HUDU (NHS): No objection. Request for a payment to mitigate the impacts of the development on the demand for primary care and mental health services.

Officer response: Contributions to NHS infrastructure would be made through CIL allocations.

449. Civil Aviation Authority: No comments received.

Officer response: Noted.

450. Active Travel England: noted that they will not be providing detailed comments on development proposals in Greater London and recommended that TfL is consulted on this application.

Officer response: Noted – TfL have been consulted on this Application.

451. City of Westminster: No comments received.

Officer response: Noted.

452. Lambeth Council: No objections raised.

Officer response: Noted.

453. Royal Parks: No comments received.

Officer response: Noted.

454. South East London Integrated Care Board: No comments received.

Officer response: Noted.

455. London Underground: No comments received.

Officer response: Noted.

456. Planning Casework Unit: No comments received.

Officer response: Noted.

457. Planning Casework Unit: No comments received.

Officer response: Noted.

Community impact and equalities assessment

458. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights

459. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.

460. 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:

    1. Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
    2. 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
    3. 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

    4. 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.

461. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.

462. 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 report and any necessary mitigation to limit adverse impacts has been secured through S106 Obligations and planning conditions (for example construction and demolition impacts will be minimised through the use of a CEMP / DEMP).

463. The scheme will deliver 243 high quality affordable homes (Class C3) thus presenting opportunities to 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. The proposed development also includes 1,106.6sqm of medical and health services which will accessible to all members of the community and will provide benefit for those groups with protected characteristics. There will also be positive health benefits in terms of open space, play space, enhanced public realm and landscaping works. The positive impacts arising from the development would benefit those groups with protected characteristics as well as the wider community.

464. The proposed scheme has also been designed to ensure inclusive access for all, providing both accessible student and conventional residential homes. All public realm areas have appropriate gradients and slopes instead of steps wherever possible. The landscaped areas will incorporate appropriately designed benches, seating and play equipment for a range of users throughout the year. There is level access into the buildings via the creation of Skipton Circus and internally the design incorporates an appropriate provision of wheelchair accessible toilets, lifts, wide corridors, doors and circulation areas.

Three blue badge parking spaces are also provided within the basement to serve the proposed 243 residential units.

465. It is considered that no groups with protected characteristics would be harmed by the proposed development and that suitable provisions have been made as part of the redevelopment of the site to benefit those groups with protected characteristics as well as the wider community.

466. Overall, 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

467. 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.

468. This application has the legitimate aim of providing a new mixed-use development. 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

469. 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.

470. 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

Was the pre-application service used for this application?	YES
If the pre-application service was used for this application, was the advice given followed?	YES
Was the application validated promptly?	YES
If necessary/appropriate, did the case officer seek amendments to the scheme to improve its prospects of achieving approval?	YES

To help secure a timely decision, did the case officer submit their recommendation in advance of the agreed Planning Performance Agreement date?	YES

CONCLUSION

471. The scheme will deliver 243 (40.03%) affordable homes on site (28.4% social rent and 11.6% intermediate housing). In addition, it provides 1,106.6sqm of flexible medical service and office space and, 944.2sqm of flexible food and beverage and retail uses with active frontages to London Road, Ontario Street and Newington Causeway. This makes a significant contribution to addressing the boroughs great need to deliver affordable housing. In addition, the scheme would provide student housing in an appropriate location which is considered to contribute positively to a mixed and inclusive neighbourhood.

472. Whilst the proposed scheme would result in the loss of office space on site, as set out in the report the land use mix is considered to be acceptable and would not compromise the delivery of the Southwark Plans aspirations to create new jobs as set out in policy ST1. In addition the design, scale and massing of the development is considered to be acceptable. The development would sit comfortably in the CAZ / townscape and whilst it would cause some limited harm to adjoining heritage assets those harms would be outweighed by public benefits which include the positive urban design aspect of the scheme. Whilst there would be some harms to neighbouring amenity in terms of daylight and sunlight, these are relatively limited.

473. The scheme would make contributions to mitigating its impact on local services through its CIL payments. In addition, s106 contributions would also be made to secure carbon off-set, training and apprenticeships, play space, cycle hire docking improvements, on-street EVCPs, active travel zone improvements, loss of employment floorspace, affordable workspace, s278 improvement works and car club provision.

474. The benefits associated with the proposed redevelopment of the site are summarised below:

1. Optimise and reuse brownfield land.
2. Contribute towards the housing requirement with an equivalent of 816 homes to help meet the Borough’s housing targets.
3. Provide 243 high quality affordable homes which accounts for 40% affordable housing provision on site (28.4% social rent and 11.6% intermediate),
4. Deliver family sized housing with 290 (24.8%) three bedroom homes.
5. Reduce pressure on the private rented market from students, and provide safe, well maintained and well managed PBSA.
6. Activate the borders of the site with the retail, food and beverage spaces helping to activate London Road, Ontario Street and Newington Causeway.
7. Achieve a 18.08% Biodiversity Net Gain (in excess of the 10% required).

8. Delivery of new public realm, creating 1,309 sqm of new open public space, including a new landscaped public square, alongside improvements to Ontario Street and the permeability of the Site through the creation of a new east/west link.
9. Deliver economic benefits with jobs within the retail, office and medical uses and in the running, maintenance and security of the PBSA, as well as jobs and training during the construction stage of the project.
10. The provision of a highly sustainable redevelopment with aspirations to achieve a BREEAM Outstanding rating. Fabric performance and operational energy will exceed the current Building Regulations. The proposals seek to reutilise the existing basement level and reuse as much of the existing building material as possible in line with circular economy principles.
11. Significant contributions to the borough in respect of S106 and CIL contributions.

475. It is therefore recommended that planning permission be granted, subject to conditions, the timely completion of a S106 Agreement and referral to the Mayor of London.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Local Development Framework and Development Plan Documents	Resources 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 0254 Council website: www.southwark.gov.uk

APPENDICES

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

AUDIT TRAIL

Lead Officer	Stephen Platts, Director of Planning and Growth	
Report Author	Chirag Bhavan, Planning Officer	
Version	Final	
Dated	28 August 2025	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	**Comments Sought**	**Comments included**
Strategic Director, Resources	No	No
Strategic Director, Environment, Sustainability and Leisure	No	No
Strategic Director, Housing	No	No
Date final report sent to Constitutional Team		1 September 2025

APPENDIX 1

Conditions for 24/AP/3432

1. The development shall be carried out in accordance with the following approved plans:

Reference no./Plan or document name/Rev.	Received on:
0999 LAR-SHS-HTA-ZZ-XX-DR-A-0999 Existing Basement Plan	
1000 LAR-SHS-HTA-ZZ-XX-DR-A-1000 Existing Ground Floor Plan	
1001 LAR-SHS-HTA-ZZ-XX-DR-A-1001 Existing First Floor Plan	
1002 LAR-SHS-HTA-ZZ-XX-DR-A-1002 Existing Second Floor Plan	
1003 LAR-SHS-HTA-ZZ-XX-DR-A-1003 Existing Third Floor Plan	
1004 LAR-SHS-HTA-ZZ-XX-DR-A-1004 Existing Fourth Floor Plan	
1005 LAR-SHS-HTA-ZZ-XX-DR-A-1005 Existing Fifth Floor Plan	
1006 LAR-SHS-HTA-ZZ-XX-DR-A-1006 Existing Sixth Floor Plan	
1007 LAR-SHS-HTA-ZZ-XX-DR-A-1007 Existing Roof Plan	
1050 LAR-SHS-HTA-ZZ-XX-DR-A-1050 Existing West Elevation	
1051 LAR-SHS-HTA-ZZ-XX-DR-A-1051 Existing North Elevation	
1052 LAR-SHS-HTA-ZZ-XX-DR-A-1052 Existing East Elevation	
1053 LAR-SHS-HTA-ZZ-XX-DR-A-1053 Existing South Elevation	
1060 LAR-SHS-HTA-ZZ-XX-DR-A-1060 Demolition Plan - Basement	
1061 LAR-SHS-HTA-ZZ-XX-DR-A-1061 Demolition Plan - Level 00	
1062 LAR-SHS-HTA-ZZ-XX-DR-A-1062 Demolition Plan - Level 01	
1063 LAR-SHS-HTA-ZZ-XX-DR-A-1063 Demolition Plan - Level 02	
1064 LAR-SHS-HTA-ZZ-XX-DR-A-1064 Demolition Plan - Level 03	

1065	LAR-SHS-HTA-ZZ-XX-DR-A-1065	Demolition Plan - Level 04
1066	LAR-SHS-HTA-ZZ-XX-DR-A-1066	Demolition Plan - Level 05
1067	LAR-SHS-HTA-ZZ-XX-DR-A-1067	Demolition Plan - Level 06
1068	LAR-SHS-HTA-ZZ-XX-DR-A-1068	Demolition Plan - Roof
1100	LAR-SHS-HTA-ZZ-XX-DR-A-1100	Location Plan
1101	LAR-SHS-HTA-ZZ-XX-DR-A-1101	Site Plan
1200	LAR-SHS-HTA-ZZ-XX-DR-A-1200	Context Elevation A-A
1201	LAR-SHS-HTA-ZZ-XX-DR-A-1201	Context Elevation B-B
1203	LAR-SHS-HTA-ZZ-XX-DR-A-1203	Context Elevation C-C
1204	LAR-SHS-HTA-ZZ-XX-DR-A-1204	Context Elevation D-D
1999	LAR-SHS-HTA-ZZ-XX-DR-A-1999	Basement Plan
2000	LAR-SHS-HTA-ZZ-XX-DR-A-2000	Level 00
2001	LAR-SHS-HTA-ZZ-XX-DR-A-2001	Level 01
2002	LAR-SHS-HTA-ZZ-XX-DR-A-2002	Level 02
2003	LAR-SHS-HTA-ZZ-XX-DR-A-2003	Level 03
2004	LAR-SHS-HTA-ZZ-XX-DR-A-2004	Level 04 (Podium Level)
2005	LAR-SHS-HTA-ZZ-XX-DR-A-2005	Level 05
2006	LAR-SHS-HTA-ZZ-XX-DR-A-2006	Level 06
2007	LAR-SHS-HTA-ZZ-XX-DR-A-2007	Level 07
2008	LAR-SHS-HTA-ZZ-XX-DR-A-2008	Level 08
2009	LAR-SHS-HTA-ZZ-XX-DR-A-2009	Level 09
2010	LAR-SHS-HTA-ZZ-XX-DR-A-2010	Level 10
2011	LAR-SHS-HTA-ZZ-XX-DR-A-2011	Level 11
2012	LAR-SHS-HTA-ZZ-XX-DR-A-2012	Level 12
2013	LAR-SHS-HTA-ZZ-XX-DR-A-2013	Level 13
2014	LAR-SHS-HTA-ZZ-XX-DR-A-2014	Level 14
2015	LAR-SHS-HTA-ZZ-XX-DR-A-2015	Level 15
2016	LAR-SHS-HTA-ZZ-XX-DR-A-2016	Level 16
2017	LAR-SHS-HTA-ZZ-XX-DR-A-2017	Level 17
2018	LAR-SHS-HTA-ZZ-XX-DR-A-2018	Level 18
2019	LAR-SHS-HTA-ZZ-XX-DR-A-2019	Level 19
2020	LAR-SHS-HTA-ZZ-XX-DR-A-2020	Level 20
2021	LAR-SHS-HTA-ZZ-XX-DR-A-2021	Level 21
2022	LAR-SHS-HTA-ZZ-XX-DR-A-2022	Level 22
2023	LAR-SHS-HTA-ZZ-XX-DR-A-2023	Level 23
2024	LAR-SHS-HTA-ZZ-XX-DR-A-2024	Level 24
2025	LAR-SHS-HTA-ZZ-XX-DR-A-2025	Level 25
2026	LAR-SHS-HTA-ZZ-XX-DR-A-2026	Level 26
2027	LAR-SHS-HTA-ZZ-XX-DR-A-2027	Level 27
2028	LAR-SHS-HTA-ZZ-XX-DR-A-2028	Level 28
2029	LAR-SHS-HTA-ZZ-XX-DR-A-2029	Level 29
2030	LAR-SHS-HTA-ZZ-XX-DR-A-2030	Level 30
2031	LAR-SHS-HTA-ZZ-XX-DR-A-2031	Level 31

2032 LAR-SHS-HTA-ZZ-XX-DR-A-2032 Level 32
2033 LAR-SHS-HTA-ZZ-XX-DR-A-2033 Combined Roof Plan
2100 LAR-SHS-HTA-ZZ-XX-DR-A-2100 Elevation A-A
2101 LAR-SHS-HTA-ZZ-XX-DR-A-2101 Elevation B-B
2102 LAR-SHS-HTA-ZZ-XX-DR-A-2102 Elevation C-C
2103 LAR-SHS-HTA-ZZ-XX-DR-A-2103 Elevation D-D
2104 LAR-SHS-HTA-ZZ-XX-DR-A-2104 Elevation E-E
2105 LAR-SHS-HTA-ZZ-XX-DR-A-2105 Elevation F-F
2150 LAR-SHS-HTA-ZZ-XX-DR-A-2150 Bay Studies C3
2151 LAR-SHS-HTA-ZZ-XX-DR-A-2151 Bay Studies PBSA
2200 LAR-SHS-HTA-ZZ-XX-DR-A-2200 Section A-A
2201 LAR-SHS-HTA-ZZ-XX-DR-A-2201 Section B-B
2202 LAR-SHS-HTA-ZZ-XX-DR-A-2202 Section C-C
2203 LAR-SHS-HTA-ZZ-XX-DR-A-2203 Section D-D
2204 LAR-SHS-HTA-ZZ-XX-DR-A-2204 Section E-E, F-F
2206 LAR-SHS-HTA-ZZ-XX-DR-A-2206 Section G-G, H-H
3050 LAR-SHS-HTA-ZZ-XX-DR-A-3050 C3 UNIT TYPE 1B2P-A-AF
3051 LAR-SHS-HTA-ZZ-XX-DR-A-3051 C3 UNIT TYPE 1B2P-WC-A-AF
3052 LAR-SHS-HTA-ZZ-XX-DR-A-3052 C3 UNIT TYPE 2B3P-A-AF
3053 LAR-SHS-HTA-ZZ-XX-DR-A-3053 C3 UNIT TYPE 2B4P-A-AF
3054 LAR-SHS-HTA-ZZ-XX-DR-A-3054 C3 UNIT TYPE 2B4P-B-SRT
3055 LAR-SHS-HTA-ZZ-XX-DR-A-3055 C3 UNIT TYPE 2B4P-C-INT
3056 LAR-SHS-HTA-ZZ-XX-DR-A-3056 C3 UNIT TYPE 2B4P-WC-A-AF
3057 LAR-SHS-HTA-ZZ-XX-DR-A-3057 C3 UNIT TYPE 2B4P-WC-B-SRT
3058 LAR-SHS-HTA-ZZ-XX-DR-A-3058 C3 UNIT TYPE 3B5P-A-SRT
3059 LAR-SHS-HTA-ZZ-XX-DR-A-3059 C3 UNIT TYPE 3B5P-B-INT
3060 LAR-SHS-HTA-ZZ-XX-DR-A-3060 C3 UNIT TYPE 3B5P-WC-A-SRT

Reason:

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

Permission is subject to the following Time Limit:

2. Time Limit

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

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

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

3. TfL Construction

Prior to any demolition or construction works, confirmation must be provided from TfL agreeing to the proposed bus shelter relocation. Please contact 3rdpartyrequests@tfl.gov.uk. An updated CEMP must also be provided which details that there should be no reversing onto London Road or Ontario Street to ensure that safety is maintained in line with the Mayor's Vision Zero approach. It should also state that the safety for users of CS7 must be maintained throughout the construction period, along with suitable cycle widths for all types of cycle.

4. Pre commencement condition survey

Prior to works commencing on site (including any demolition) a joint condition survey should be arranged with Southwark Highway Development Team to catalogue condition of streets and drainage gullies. Please contact the team via Highwaysdm@southwark.gov.uk to arrange.

5. Circular Economy Statement

No development shall take place until a detailed Circular Economy Statement in line with the GLA's Circular Economy Statement Guidance is submitted to and approved in writing by the Local Planning Authority. The

development shall be carried out in accordance with the details so approved.

Reason: In the interests of sustainable waste management and in order to maximise the re-use of materials as required by the National Planning Policy Framework (2023); Policy SI 2 (Minimising Greenhouse Gas Emissions) of the London Plan (2021) and Policy P6 (Reducing waste) Policy P70 (Energy) of the Southwark Plan (2022).

6. Overheating

Prior to the occupation of the development details of any additional measures required to prevent any of the units within these blocks from overheating shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the details thereby approved, and any mitigation measures required shall be provided at no expense to the occupiers prior to the occupation of the affected units and maintained as such thereafter. Guidance on avoiding overheating shall be provided to occupiers of the affected units in perpetuity.

Reason: In the interests of the amenity of future occupiers, in accordance with SI4 (Managing heat risk) of the London Plan 2021 and Policy P15 (Residential design) and of the Southwark Plan (2022).

7. Drainage Strategy - Details

No works (excluding demolition and site clearance) shall commence until full details of the proposed surface water drainage system incorporating Sustainable Drainage Systems (SuDS) have been submitted to and approved in writing by the Local Planning Authority, including detailed design, size and location of attenuation units (including a half drain time of less than 24 hours) and details of flow control measures. The strategy should achieve a reduction in surface water runoff rates during the 1% Annual Exceedance Probability (AEP) event plus climate change allowance, as detailed in the Drainage Strategy prepared by CUBE Consulting Engineers (dated 26/07/2024). The applicant must demonstrate that the site is safe in the event of blockage/failure of the system, including consideration of exceedance flows. The site drainage must be constructed to the approved details.

Reason: To minimise the potential for the site to contribute to surface water flooding in accordance with Southwark's Strategic Flood Risk Assessment (2017) and Policy SI 13 of the London Plan (2021).

8. 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

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

A report shall be submitted in writing to and approved by the LPA detailing acoustic predictions

and mitigation measures to ensure the above standards are met. Following completion of the

development and prior to occupation, a validation test shall be carried out on a relevant sample of

premises. The results shall be submitted to the LPA for approval in writing. The approved scheme

shall be implemented and permanently maintained thereafter.

Reason

To ensure that the occupiers and users of the development do not suffer a loss of amenity by

reason of excess noise from environmental and transportation in accordance with the Southwark

Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing

soundscapes), and the National Planning Policy Framework 2021.

9. Ministry of Sound

a) Prior to commencement of any above grade works to Buildings 1A and 2A, an acoustic assessment and detailed scheme of insulation measures (to included residential glazing, faced and ventilation specifications) for the

North facade facing the MoS shall be submitted to the Local Planning Authority for approval. The scheme of measures shall be designed to ensure that sound from inside the Ministry of Sound, assuming normal operating noise levels, premises at shall not exceed:

I. In any habitable room, at any time: 27dBA Leq, 5 mins

II. In any bedroom, at any time after 23:00 hours (excluding sound from the MoS Courtyard): the octave band Lmax,slow values set out in the Table below:

63 Hz	125 Hz	250 Hz	500 Hz	1000 Hz	2000 Hz	4000 Hz
47	38	26	19	15	12	9

b) On completion and before the properties are occupied, validation testing to demonstrate compliance with the approved scheme of measures and above standards in (a) shall be undertaken using an agreed sample of 5% of the affected properties. The report from the validation testing shall be approved in writing by the Local Planning Authority prior to first occupation.

c) Any mitigation approved and completed under b shall be maintained thereafter.

Reason: To ensure that suitable internal sound levels for the dwellings and that unreasonable restrictions are not placed on the Ministry of Sound in accordance with D13 Agent of Change of the London Plan 2021:P56, Protection of Amenity of the Southwark Plan 2022 and paragraph 200 of the National Planning Policy Framework 2024.

10. Protection from Vibration pre approval

The development must be designed to ensure that habitable rooms in the residential element of the development are not exposed to vibration dose values in excess of 0.13 m/s during the nighttime period of 23.00 07.00hrs. A written report shall be submitted to and approved by the Local Planning Authority detailing acoustic predictions and mitigation measures to ensure the above standard is met. Following completion of the development but prior to residential 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 and the approved scheme 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 excess vibration from transportation sources in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity), and the National Planning Policy Framework 2021.

11. Residential ' Vertical sound transmission between potentially loud commercial and residential properties on new build

The habitable rooms within the development sharing a party wall/ceiling/floor element with commercial premises shall be designed and constructed to provide reasonable resistance to the transmission of sound sufficient to ensure that noise due to the commercial premises does not exceed NR20 when measured as an LAeq across any 5 minute period. A report shall be submitted in writing to and approved by the LPA detailing acoustic predictions and mitigation measures to ensure the above standard is met. The development shall be carried out in accordance with the approval given. 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 and the approved scheme shall be permanently maintained thereafter.

Reason: To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of noise nuisance and other excess noise from activities within the commercial premises in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2021.

12. NOISE FROM COMMERICAL CLASS E

Its not known what type of commercial units will move in, as such the following condition ensure that any end use will be adequately insulated to protect the residential uses:

Noise from amplified music from non-residential premises pre approval A scheme of sound insulation shall be installed to ensure that the LFmax sound from amplified and non-amplified music and speech shall not exceed the lowest L90 5min at 1m from the facade of nearby residential premises at all third octave bands between 63Hz and 8kHz. Prior to the

commencement of use of the commercial premises the proposed scheme of sound insulation shall be submitted to the local planning authority for approval. The scheme of sound insulation shall be constructed and installed in accordance with the approval given and shall be permanently maintained thereafter. Following completion of the development and prior to the commencement of use of the commercial premises, a validation test shall be carried out. The results shall be submitted to the LPA for approval in writing.

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 associated with nonresidential premises in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2021.

13. 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.

Suitable acoustic treatments shall be used to ensure compliance with the above standard. A validation test shall be carried out and the results submitted to the Local Planning Authority for approval in writing to demonstrate compliance with noise levels criteria outlined in the Noise and Vibration Impact Assessment Report (Ref: QA23395/NIA, Quantum Acoustics Ltd, dated 01 August 2024). 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.

14. Commercial Kitchen Extract Ventilation pre-approval

Prior to the commencement of use, full particulars and details of a scheme for the extraction and ventilation of the commercial kitchen shall be submitted to and approved by the Local Planning Authority. The scheme shall include: Details of extraction rate and efflux velocity of extracted air Full details of grease, particle and odour abatement plant The location and orientation of the extraction ductwork and discharge terminal A management servicing plan for maintenance of the extraction system To ensure that fumes and odours from the kitchen to do affect public health or residential amenity. Once approved the scheme shall be implemented in full and permanently maintained thereafter.

Reason In order to ensure that that any installed ventilation, ducting and ancillary equipment in the interests of amenity will not cause amenity impacts such as odour, fume or noise nuisance and will not detract from the appearance of the building in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P65 (Improving air quality), and the National Planning Policy Framework 2021.

15. Site Contamination

a) Prior to the commencement of any development works, an intrusive site investigation and associated risk assessment shall be completed (subsequent to the A Squared Phase 1 desk study, ref: 3127-A2S-XX-XX-RP-Y-0001-00, dated: 26 March 2024) to fully characterise the nature and extent of any contamination of soils and ground water on the site. b) In the event that contamination is found that presents a risk to future users or controlled waters or other receptors, a detailed remediation and/or mitigation strategy shall be prepared and submitted to the Local Planning Authority for approval in writing. The strategy shall detail all proposed actions to be taken to bring the site to a condition suitable for the intended use together with any monitoring or maintenance requirements. The scheme shall also ensure that as a minimum, the site should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. The approved remediation scheme (if one is required) shall be carried out and implemented as part of the development. c) Following the completion of the works and measures identified in the approved remediation strategy, a verification report providing evidence that all works required by the remediation strategy have been completed, together with any future monitoring or maintenance requirements shall be submitted to and approved in writing by the Local Planning Authority. d) In the event that potential contamination is found at any time when carrying out the approved development that was not previously identified, it shall be reported in writing immediately to the Local Planning Authority, and a

scheme of investigation and risk assessment, a remediation strategy and verification report (if required) shall be submitted to the Local Planning Authority for approval in writing, in accordance with a-c above.

Reason To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off-site receptors in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P64 (Contaminated land and hazardous substances), and the National Planning Policy Framework 2021.

16. Thames Water

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.

17. Thames water Piling

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 water infrastructure, and the programme for the works) and piling layout plan including all Thames Water clean water 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 water utility infrastructure. Piling 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 Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

18. Ongoing Waste Management Plan

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).

19. Digital Connectivity Infrastructure

Prior to commencement of any works (with the exception of demolition to ground level and substructure works), detailed plans shall be submitted to and approved in writing by the Local Planning Authority demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development. The development shall be carried out in

accordance with the approved plans and maintained as such for the lifetime of the development.

Reason: To provide high quality digital connectivity infrastructure to contribute to London's global competitiveness, in accordance with the National Planning Policy Framework (2023); Policy SI 6 (Digital Connectivity Infrastructure) of the London Plan (2021) and Policy P44 (Broadband and digital infrastructure) of the Southwark Plan (2022).

20. On-site renewable energy technologies

Prior to commencement of works for the development the applicant must submit to the Local Planning Authority an updated roof layout drawing to demonstrate that PV generation has been maximised for that Phase/building of 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).

21. Environmental Agency Condition 1

No development approved by this planning permission shall commence until a remediation strategy to deal with the risks associated with contamination of the site in respect of the development hereby permitted, has been submitted to, and approved in writing by, the local planning authority. This strategy will include the following components:

1. A preliminary risk assessment which has identified:

o all previous uses

o potential contaminants associated with those uses

o a conceptual model of the site indicating sources, pathways and receptors

o potentially unacceptable risks arising from contamination at the site

2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off-site.

3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the written consent of the local planning authority. The scheme shall be implemented as approved.

Reason

To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution, in line with the National Planning Policy Framework (NPPF) (paragraph 187).

22. Environmental Agency - Condition 2

Prior to any part of the permitted development being occupied, a verification report demonstrating the completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to, and approved in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

Reason

To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site in line with paragraph 187 of the National Planning Policy Framework.

23. Environmental Agency - Condition 3

Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated by a piling risk assessment that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason

To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants in line with paragraph 187 of the National Planning Policy Framework.

24. Waste Management Plan

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).

25. Tree Protection

Prior to works commencing, including any demolition, an Arboricultural Method Statement shall be submitted to and approved in writing by the Local Planning Authority.

a) A pre-commencement meeting shall be arranged, the details of which shall be notified to the Local Planning Authority for agreement in writing prior to the meeting and prior to works commencing on site, including any demolition, changes to ground levels, pruning or tree removal.

b) A detailed Arboricultural Method Statement showing the means by which any retained trees on or directly adjacent to the site are to be protected from damage by demolition works, excavation, vehicles, stored or stacked building supplies, waste or other materials, and building plant, scaffolding or other equipment, shall then be submitted to and approved in writing by the Local Planning Authority. The method statements shall include details of facilitative pruning specifications and a supervision schedule overseen by an accredited arboricultural consultant.

c) Cross sections shall be provided to show surface and other changes to levels, special engineering, foundation or construction details and any proposed activity within root protection areas or the influencing distance (30m) of local trees required in order to facilitate demolition, construction and excavation.

The existing trees on or adjoining the site which are to be retained shall be protected and both the site and trees managed in accordance with the recommendations contained in the method statement. Following the pre-commencement meeting all tree protection measures shall be installed, carried out and retained throughout the period of the works, unless otherwise agreed in writing by the Local Planning Authority.

All Arboricultural Supervisory elements are to be undertaken in accordance with the approved Arboricultural Method Statement site supervision key stages (BS: 5837 (2012)) for this site, as evidenced through signed sheets and photographs.

In any case, all works must adhere to BS5837: (2012) Trees in relation to demolition, design and construction and BS3998: (2010) Tree work - recommendations; BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf); EAS 01:2021 (EN) -Tree Pruning Standard; EAS 02:2022 (EN) - Tree

Cabling/Bracing Standard; EAS 03:2022 (EN) - Tree Planting Standard. NHBC 4.2.13 Tables for Foundations Near Trees

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

26. Cycle Parking

Prior to the fitting out of the basement and the ground and first floor of the PBSA building, and notwithstanding the cycle store layouts shown on the submitted drawings, full details of the cycle parking facilities (including cross sections, with aisle widths and floor to ceiling heights clearly labelled) shall be submitted to and approved by the Local Planning Authority for each Building. Provision shall be made for a minimum of 81 spaces for residential and 322 spaces for the PBSA.

Reason - To promote sustainable travel and to ensure compliance with Chapter 9 (Promoting sustainable transport) of the National Planning Policy Framework (2023); Policy T5 (Cycling) of the London Plan (2021) and Policy P53 (Cycling) of the Southwark Plan (2022).

27. Biodiverse Roofs

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:

Proposed biodiverse green roofs should include a varied substrate with a varied depth of 80mm-150mm. They should be seeded and plug planted with wildflower species and meet the requirements of the GRO Code. Sedum species should be avoided.

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).

28. 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.

Planting areas should include native and pollinator friendly shrub and herbaceous planting. The use of nectar-rich and berry producing plants is encouraged. 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. Species used within planting areas should be on the RHS plants 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).

Permission is subject to the following Grade Condition(s)

29. Hard and Soft landscaping

Before any above grade work hereby authorised begins, detailed drawings of a hard and soft landscaping scheme showing the treatment of all parts of the site not covered by buildings shall be submitted to and approved in writing by the Local Planning Authority. The site shall be landscaped strictly in accordance with the approved details in the first planting season after completion of the development. Details shall include:

a) a scaled plan showing all existing vegetation and landscape features to be retained with proposed trees, hedging, perennial and other plants;

b) proposed parking, access, or pathway layouts, materials and edge details;

c) location, type and materials to be used for hard landscaping including specifications, where applicable for:

o permeable paving

o tree pit design

o underground modular systems

o sustainable urban drainage integration

o use within tree Root Protection Areas (RPAs);

d) typical cross sections;

e) a schedule detailing sizes and numbers/densities of all proposed trees/plants;

f) specifications for operations associated with plant establishment and maintenance that are compliant with best practise; and

g) types and dimensions of all boundary treatments.

h) repair and upgrade works to the boundary wall between the subject site and The Charter School East Dulwich

There shall be no excavation or raising or lowering of levels within the prescribed root protection area of retained trees unless agreed in writing by the Local Planning Authority.

The landscaping shall not be carried out otherwise than in accordance with any such approval given and shall be retained for the duration of the use. Any trees, shrubs, grass or other planting that is found to be dead, dying, severely damaged or diseased within five years of the completion of the building works OR five years of the carrying out of the landscaping scheme (whichever is later), shall be replaced in the next planting season by specimens of the equivalent stem girth and species in the first suitable planting season.

Unless required by a separate landscape management condition, all soft landscaping shall have a written five-year maintenance programme following planting.

Works shall comply to BS: 4428 Code of practice for general landscaping operations, BS: 5837 (2012) Trees in relation to demolition, design and construction; BS3998: (2010) Tree work - recommendations, BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf); EAS 03:2022 (EN) - Tree Planting Standard.

Reason:

So that the Council may be satisfied with the details of the landscaping scheme, in accordance with: Chapters 8, 12, 15 and 16 of the National Planning Policy Framework 2021; Policies SI 4 (Managing heat risk), SI 13 (Sustainable drainage), G1 (Green Infrastructure, G5 (Urban Greening) and G7 (Trees and Woodlands) of the London Plan 2021; Policy P13 (Design of Places), Policy P14 (Design Quality), Policy P56 (Protection of Amenity), Policy P57 (Open Space), Policy P60 (Biodiversity) and P61 (Trees) of the Southwark Plan (2022).

30. Materials

Prior to above grade construction commencing, material samples/sample panels/sample-boards of those materials, including finish and details of colouration, to be used for that building, shall be presented on site and approved in writing by the Local Planning Authority; the development shall not be carried out otherwise than in accordance with any such approval given.

Reason: In order to ensure that these samples will make an acceptable contextual response in terms of materials to be used, and achieve a quality of design and detailing in accordance with the National Planning Policy Framework 2021; Policy D4 Delivering Good Design of the London Plan 2021; and Policy P14 Design Quality of the Southwark Plan 2022.

31. Detailed drawings

1:5/10 typical section detail-drawings through all buildings facades; parapets; heads, cills and jambs of all openings; entrance lobbies; shop frontages; roof edges; details of typical window openings, terraces, roof gardens, entrances (inc servicing) and shopfronts to be used in the carrying out of this permission shall be submitted to and approved in writing by the Local Planning Authority before any construction work above grade in connection with this permission is carried out. The scope of details to be submitted to the Local Planning Authority shall be agreed prior to submission. 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 2021; Policy D4 Delivering Good Design of the London Plan 2021; and Policy P14 Design Quality of the Southwark Plan 2022.

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

32. Provision of Cycle Storage

Before the first occupation of each building hereby approved, the cycle facilities (including cycle storage, showers, changing rooms and lockers

where appropriate) as shown on the drawings hereby approved shall be provided for that building 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).

33. Trees - Landscape Management Plan

Prior to the occupation of the development or any phase of the development, whichever is the sooner, a landscape management plan, including long term design objectives to meet BNG requirements, management responsibilities and maintenance schedules for all landscape areas, other than small, privately owned, domestic gardens, shall be submitted to and approved by the Local Planning Authority.

Details of an irrigation schedule shall be provided for all trees to ensure successful establishment.

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).

34. Trees - Arboricultural Site Supervision

Prior to occupation, the completed schedule of site supervision and monitoring of the arboricultural protection measures as approved in tree protection condition shall be submitted for approval in writing by the Local Planning Authority. This condition may only be fully discharged on completion of the development, subject to satisfactory written evidence of compliance through contemporaneous supervision and monitoring of the tree protection throughout construction by the retained project or pre-appointed tree specialist.

Works shall comply to BS: 5837 (2012) Trees in relation to demolition, design and construction; BS3998: (2010) Tree work - recommendations; BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf); EAS 01:2021 (EN) - Tree Pruning Standard; EAS 02:2022 (EN) - Tree Cabling/Bracing Standard; EAS 03:2022 (EN) - Tree Planting Standard.

Reason: To avoid damage to the existing trees which represent an important visual amenity in the area, in accordance with the National Planning Policy Framework (2023) Chapters 7 (Ensuring the vitality of town centres), 8 (Promoting healthy and safe communities), 11 (Making effective use of land), 12 (Achieving well-designed places), Chapter 14 (Meeting the challenge of climate change), and chapters 15 & 16 (Conserving and enhancing the natural and historic environment); Policy G7 (Trees and Woodlands) of the London Plan (2021); Policy P13 (Design of Places), Policy P14 (Design Quality), Policy P56 (Protection of Amenity), Policy P57 (Open Space), Policy P60 (Biodiversity) and P61 (Trees) of the Southwark Plan (2022).

35. Whole Life Carbon - Post Construction Assessment

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

The Post-Construction Assessment should be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk, along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the Local Planning Authority, prior to occupation of the development.

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

36. Circular Economy

Prior to the occupation of the development, a Post Construction Monitoring Report should be completed in line with the GLA's Circular Economy Statement Guidance. The Post Construction Monitoring Report shall be submitted to the GLA, currently via email at: circulareconomystatements@london.gov.uk, along with any supporting evidence as per the guidance. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the Local Planning Authority, prior to occupation of the development.

Reason: In the interests of sustainable waste management and in order to maximise the re-use of materials in accordance with Policy P62 (Reducing waste) of the Southwark Plan 2022

37. Secured by Design.

A. Notwithstanding the approved plans and documents, prior to the commencement of the development hereby approved, details shall be submitted to and approved in writing by the Local Planning Authority to

demonstrate that the development will achieve Secured by Design accreditation.

B. Within three [3] months of first occupation, evidence that Secure by Design Accreditation has been achieved shall be provided in writing to the Local Planning Authority.

C. The development shall be retained in accordance with the approved details.

Reason: In order to achieve the principles and objectives of Secured By Design, to improve community safety and crime prevention.

38. Drainage Strategy - Verification Report

No dwelling shall be occupied until a drainage verification report prepared by a suitably qualified engineer has been submitted to and approved in writing by the Local Planning Authority. The report shall provide evidence that the drainage system (incorporating SuDS) has been constructed according to the approved details and specifications (or detail any minor variations where relevant) as detailed in the Drainage Strategy prepared by CUBE Consulting Engineers (dated 26/07/2024) and shall include plans, photographs and national grid references of key components of the drainage network such as surface water attenuation structures, flow control devices and outfalls. The report shall also include full details of the responsible management company.

Reason: To ensure the surface water drainage complies with Southwark's Strategic Flood Risk Assessment and Policy SI 13 of the London Plan (2021).

39. BNG

Prior to occupation, a scheme for monitoring the effectiveness of the biodiversity mitigation and enhancement measures for that building shall be submitted to and approved by the Local Planning Authority. The monitoring should include annual protected species surveys of created receptor habitats, botanical surveys of created habitats invertebrate surveys of the gravel piles and use of bird and bat boxes. The monitoring shall be carried out and reported to the Local Planning Authority in accordance with the agreed scheme for a period of 30 years. Surveys should be undertaken in years 1, 3, 5, 7, 10, 15, 20, 25 and 30 following first occupation. Species

results will be submitted to the London Biological Records Centre, Greenspace Information for Greater London (GIGL).

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

40. Detailed Travel Plan

a) Before the first occupation of the development hereby permitted commences, the applicant shall submit in writing and obtain the written approval of the Local Planning Authority to a Travel Plan(s) 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 each building, including staff and visitors.

b) At the start of the second year of operation of the approved Travel Plan(s), a detailed survey showing the methods of transport used by all those users of each 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 of each building 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(s) a detailed survey showing the methods of transport used by all those users of each 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 of each building 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).

41. Delivery Servicing Management Plan

Prior to first occupation of each building hereby permitted a Delivery and Service Management Plan detailing how all elements of that building are to be serviced, shall be submitted to and approved by the Local Planning Authority. Detailed DSMP to include provision for accommodating TfL Cycle Hire maintenance vehicles within the proposed on-site loading bay. The servicing of the development shall be carried out in accordance with the approval given and the Service Management Plan(s) shall remain extant for as long as the development is occupied.

Reason: To ensure compliance with the National Planning Policy Framework (2023); Policy P49 (Public transport); Policy P50 (Highways impacts); Policy P51 (Walking) of the Southwark Plan (2022)

42. Foul water

No development shall be occupied until confirmation has been provided that either:

1. Foul water Capacity exists off site to serve the development, or

2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. 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, or

3. All Foul water network upgrades required to accommodate the additional flows from the development have been completed.

Reason - Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval.

43. Surface Water

The development shall not be occupied until confirmation has been provided that either:

1. All surface water network upgrades

required to accommodate the additional flows from the development have been completed; or

2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation 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 - Network reinforcement works are likely to be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval.

44. Water Capacity

Thames Water are currently working with the developer of application 24/AP/3432 to identify and deliver the off site water infrastructure needs to serve the development. Thames Water have identified that some capacity exists within the water network to serve the first 75 dwellings but beyond that upgrades to the water network will be required. Works are on going to understand this in more detail and as such Thames Water feel it would be prudent for an appropriately worded planning condition to be attached to any approval to ensure development doesn't outpace the delivery of essential infrastructure.

There shall be no occupation beyond the first 75 dwellings until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or- a development and infrastructure phasing plan has been agreed with Thames Water to allow additional development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation of those additional dwellings shall take place other than in accordance with the agreed development and infrastructure phasing plan.

Reason - The development may lead to low / no water pressures 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. Any necessary reinforcement works will be necessary in order to avoid low / no water pressure issues."Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval.

45. Air quality report condition

Prior to occupation this development shall achieve full compliance with the air quality assessment mitigation measures as detailed in

Reason: To protect future occupiers from poor external air quality in accordance with the National Planning Policy Framework (2023); Policy P56 (Protection of amenity) and Policy P65 (Improving air quality) of the Southwark Plan (2022).

Permission is subject to the following Compliance Condition(s)

46. Servicing hours ' standard

Any deliveries or collections to the commercial units shall only be between the following hours:

o 07:00 - 9:30hrs and 17:00 - 19:00hrs on Mondays to Sundays & Bank Holidays.

Reason: To safeguard the amenity of neighbouring residential properties 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

47. External Lighting

Any external lighting system installed at the development shall comply with the Institute of Lighting Professionals (ILE) Guidance Note 1 for the reduction of obtrusive light (2021). Details of any external lighting (including: design; power and position of luminaries; light intensity contours) of all affected external areas (including areas beyond the boundary of the development) shall be submitted to and approved by the Local Planning Authority in writing before any such lighting is installed. The development shall not be carried out otherwise than in accordance with any such approval given. Prior to the external lighting being used, a validation report shall be shall be submitted to the LPA for approval in writing.

Reason In order that the Council may be satisfied as to the details of the development in the interest of the visual amenity of the area, the amenity and privacy of adjoining occupiers, and their protection from light nuisance, in accordance with the Southwark Plan 2022 Policy P16 (Designing out crime); Policy P56 (Protection of amenity), and the National Planning Policy Framework 2021.

48. Overheating - Compliance

The development hereby approved shall be carried out in full accordance with the approved overheating strategy including installation of all passive and/or active measures to prevent overheating prior to first occupation of the development. The approved passive and/or active measures to prevent overheating shall be retained and maintained for the lifetime of the development.

Reason: To ensure the development is designed and operated to minimise the risk of internal overheating and is an energy efficient building in accordance with Policy SI4 (Managing heat risk) in the London Plan (2021), Policy P69 (Sustainability standards) in Southwark Plan (2022).

49. NABERS

(a) The development hereby approved shall achieve a 'excellent' NABERS energy efficiency rating or an equivalent independent measure of energy efficiency.

(b) An as-built Post Completion Certificate (or equivalent certification) confirming that the development has been completed in accordance with the required NABERS energy efficiency rating shall be submitted to the Local Planning Authority for approval within 6 three months of first occupation of the development.

(c) An in-use Post Completion Certificate (or equivalent certification) confirming that the development is being operated in accordance with the approved NABERS energy efficiency rating shall be submitted to us for our approval within 15 months of first occupation of the development.

Reason: To ensure the development minimises operational carbon dioxide emissions and achieves the highest levels of sustainable design and construction in accordance with Policy SI2 (Minimising greenhouse gas emissions) in the London Plan (2021), the Mayor's Energy Assessments guidance (2021) and Policy P70 (Energy) in the Southwark Plan (2022).

50. Restriction: no instatement of appurtenances

No meter boxes, flues, vents or pipes [other than rainwater pipes] or other appurtenances not shown on the approved drawings shall be fixed or installed on the elevations of the buildings, unless otherwise approved by the Council.

Reason: To ensure such works do not detract from the appearance of the building (s) in accordance with The National Planning Policy Framework (2023); Policy D4 (Delivering good design) of the London Plan (2021) and

Policy P13 (Design of places) and Policy P14 (Design quality) of the Southwark Plan (2022).

51. Highways - Doors

Notwithstanding the drawings hereby approved, no door shall open outwards over the public highway, public footway or any part of the publicly-accessible realm with the exception of fire escape access.

Reason: In order that the footway is kept clear of clutter to facilitate the unobstructed movement of pedestrians, including wheelchair users and the mobility impaired, having regard to the high levels of pedestrian footfall in this location, in accordance with the National Planning Policy Framework (2023); Policy P13 (Design of places) and Policy P51 (Walking) of the Southwark Plan (2022).

52. Compliance with Fire Statement

The development hereby approved shall be carried out in accordance with the recommendations of the Fire Safety Statement XX, 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).

53. Partial Discharge

Where any application is made to discharge a condition on a partial basis (i.e. part of), the submission shall be accompanied by a statement setting out the relationship of such details to previous parts of, the details of which have already been determined, and subsequent Buildings/Phases as appropriate. The statement shall demonstrate compliance and compatibility with the various details, strategies, drawings and other documents approved pursuant to this planning permission. The statement shall be submitted to the Local Planning Authority as part of any partial or phased discharge of planning conditions

Reason: To ensure that the scheme is implemented on a comprehensive and sustainable basis in accordance with Chapter 1 (Planning London's Future - Good Growth) of the London Plan (2021), Strategic Policies SP1-SP6 of the Southwark Plan and the NPPF (2023).

54. Protection from Vibration ' ongoing compliance

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

Reason: To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of excess vibration from transportation sources in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity), and the National Planning Policy Framework 2021.

APPENDIX 2

Relevant Planning Policy

National Planning Policy Framework (NPPF)

The revised National Planning Policy Framework ('NPPF') was published in December 2023 which sets out the national planning policy and how this needs to be applied. The NPPF focuses on sustainable development with three key objectives: economic, social and environmental.

Paragraph 02 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications. The particularly relevant chapters from the Framework are:

1. Section 2 - Achieving sustainable development
2. Section 5 – Delivering a sufficient supply of homes
3. Section 6 - Building a strong, competitive economy
4. Section 7 – Ensuring the vitality of town centres
5. Section 8 - Promoting healthy and safe communities
6. Section 9 - Promoting sustainable transport
7. Section 11 - Making effective use of land
8. Section 12 - Achieving well–designed and beautiful places
9. Section 14 - Meeting the challenge of climate change, flooding and coastal change
10. Section 15 - Conserving and enhancing the natural environment
11. Section 16 - Conserving and enhancing the historic environment

The London Plan 2021

On 2 March 2021, the Mayor of London published the London Plan 2021. The spatial development strategy sets a strategic framework for planning in Greater London and forms part of the statutory Development Plan for Greater London. The relevant policies are:

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

2. Good Growth 1 - Building strong and inclusive communities
3. Good Growth 2 - Making the best use of land
4. Good Growth 3 - Creating a healthy city
5. Good Growth 4 - Delivering the homes Londoners need
6. Good Growth 5 - Growing a good economy
7. Good Growth 6 - Increasing efficiency and resilience

8. Policy SD1 - Opportunity Areas
9. Policy SD10 - Strategic and local regeneration
10. Policy D1 - London's form, character and capacity for growth
11. Policy D3 - Optimising site capacity through the design-led approach
12. Policy D4 - Delivering good design
13. Policy D5 - Inclusive design
14. Policy D6 - Housing quality and standards
15. Policy D7 - Accessible housing
16. Policy D8 - Public realm
17. Policy D9 - Tall buildings
18. Policy D10 – Basement development
19. Policy D11 - Safety, security and resilience to emergency
20. Policy D12 - Fire safety
21. Policy D13 - Agent of Change
22. Policy D14 - Noise
23. Policy H1 - Increasing housing supply
24. Policy H4 - Delivering affordable housing
25. Policy H5 - Threshold approach to applications
26. Policy H6 - Affordable housing tenure
27. Policy H7 - Monitoring of affordable housing
28. Policy H10 – Housing size mix
29. Policy S1 – Developing London's social infrastructure
30. Policy S4 - Play and informal recreation

31. Policy S6 - Public toilets
32. Policy E1 - Offices
33. Policy E2 - Providing suitable business space
34. Policy E3 - Affordable workspace
35. Policy E9 - Retail, markets and hot food takeaways
36. Policy E11 - Skills and opportunities for all
37. Policy HC1 - Heritage conservation and growth
38. Policy HC3 - Strategic and local views
39. Policy HC5 - Supporting London's culture and creative industries
40. Policy HC6 - Supporting the night-time economy
41. Policy G1 - Green infrastructure
42. Policy G4 – Open space
43. Policy G5 - Urban greening
44. Policy G6 - Biodiversity and access to nature
45. Policy SI 1 - Improving air quality
46. Policy SI 2 - Minimising greenhouse gas emissions
47. Policy SI 3 - Energy infrastructure
48. Policy SI 4 - Managing heat risk
49. Policy SI 5 - Water infrastructure
50. Policy SI 6 - Digital connectivity infrastructure
51. Policy SI 7 – Reducing waste and supporting the circular economy
52. Policy SI 8 - Waste capacity and net waste self-sufficiency
53. Policy SI 12 - Flood risk management
54. Policy SI 13 - Sustainable drainage
55. Policy T1 - Strategic approach to transport
56. Policy T2 - Healthy Streets
57. Policy T3 - Transport capacity, connectivity and safeguarding
58. Policy T4 - Assessing and mitigating transport impacts
59. Policy T5 - Cycling
60. Policy T6 - Car parking
61. Policy T6.5 - Non-residential disabled persons parking

62. Policy T7 - Deliveries, servicing and construction

63. Policy T9 - Funding transport infrastructure through planning

Southwark Plan 2022

The Southwark Plan 2022 was adopted on 23 February 2022. The plan provides strategic policies, development management policies, area visions and site allocations which set out the strategy for managing growth and development across the borough from 2019 to 2036. The relevant policies are:

1. ST1 Southwark's Development Targets

2. SP1 – Homes for all
3. SP2 – Southwark together
4. SP3 – A great start in life
5. SP4 – Green and inclusive economy
6. SP5 – Thriving neighbourhoods and tackling health inequalities
7. SP6 – Climate emergency

8. AV.09 – Elephant and Castle Area Vision

9. P1 – Social rented and intermediate housing
10. P2 – New family homes
11. P4 – Private rented homes
12. P5 – Student homes
13. P8 – Wheelchair accessible and adaptable housing
14. P13 – Design of places
15. P14 – Design quality
16. P15 – Residential
17. P16 – Designing out crime
18. P17 – Tall buildings
19. P18 – Efficient use of land
20. P19 – Listed buildings and structures
21. P20 – Conservation areas

22. P21 – Conservation of the historic environment and natural heritage
23. P22 – Borough views
24. P23 – Archaeology
25. P26 – Local List
26. P28 – Access to employment and training
27. P30 – Office and business development
28. P31 – Affordable workspace
29. P32 – Small shops
30. P33 – Business relocation
31. P35 – Town and local centres
32. P39 – Shop fronts
33. P44 – Broadband and digital infrastructure
34. P45 – Healthy developments
35. P47 – Community uses
36. P49 – Public transport
37. P50 – Highways impacts
38. P51 – Walking
39. P53 – Cycling
40. P54 – Car parking
41. P56 – Protection of amenity
42. P59 – Green infrastructure
43. P60 – Biodiversity
44. P61 – Trees
45. P64 – Contaminated land and hazardous substances
46. P65 – Improving air quality
47. P66 – Reducing noise pollution and enhancing soundscapes
48. P67 – Reducing water use
49. P68 – Reducing flood risk
50. P69 – Sustainability standards
51. P70 – Energy

52. IP1 – Infrastructure

53. IP2 – Transport infrastructure

54. IP3 – Community infrastructure levy (CIL) and Section 106 planning obligations

55. IP6 – Monitoring development

56. IP7 – Statement of Community Involvement

57. Also of relevance in the consideration of this application is the Sustainable Design and Construction SPD (2008) and the Heritage SPD 2021.

APPENDIX 3

Planning history of the site and nearby sites

1. Site History:

Ref No.	Decision/ Date	Site address	Description
09/AP/2333	Approved - 08/12/2009	Skipton House	Installation of a cycle hire docking station for the Transport of London Cycle Hire Scheme to the footway adjacent to Skipton House on Ontario Street.
15/AP/5125	Withdrawn (resolution to grant obtained) – 12/07/2016	Skipton House	The Site included the Perry Library building and the Keyworth Street Hostel buildings adjacent to the north of the Site. The application sought the demolition of the existing buildings and creation of 2 levels of basement and the erection of buildings ranging from Ground Floor plus 7 to ground floor plus 39 storeys. The development comprised retail uses (Use Classes A1/A3/A4) at ground floor, multifunctional cultural space (Use Classes D1/D2/Sui Generis) and flexible retail/fitness space (Uses Classes A1/A3/A4 and D2) below ground, and office use (Use Class B1) and 421 residential units (Use Class C3) on upper levels, new landscaping and public realm, a roof garden, ancillary servicing and plant, cycle parking and associated works. The development consisted of two blocks along Ontario Street and a further block along Newington Causeway with the introduction of a new pedestrian street running parallel to Ontario Street

			and Newington Causeway between the two blocks.
18/AP/4194	Approved 17/02/2022	Skipton House	Part retention, part demolition, reconfiguration and re-cladding of existing building and extension to create six additional storeys to accommodate office space (Use Class B1) at upper floor levels, a gym (Use Class D2) and flexible retail/commercial uses (Use Class A1/A2/A3) at ground floor level with associated cycle parking, landscaping, ancillary servicing and plant and all associated works. The permission has yet to be implemented.
23/AP/0410	Approved - 2808/2023	Skipton House	AP/0410 Change of use from office to a flexible use at floors 1 to six (inclusive) to enable office (Class E) and/or education uses (Class F) and flexible mixed uses at the ground and basement to enable retail/cafe/restaurant (Class E) and/or gym (Class E) and/or storage (Class B8) and/or offices (Class E) and/or education uses (Class F), in addition to plant, cycle parking and shower facilities, refuse/recycling storage, car parking and loading bays at basement; external alterations to the building facade including new entrance and roof terrace; landscaping and visitor cycle parking to public realm and all associated works

APPENDIX 4

Consultation undertaken

Site notice date: 17/12/2024 – 10/01/2025

Press notice date: 17/12/2024

Case officer site visit date: 17/12/2024

Neighbour consultation letters sent: 12/12/2024 and 02/07/2025

Internal services consulted

Flood Risk Management & Urban Drainage Team

LBS Environmental Protection Team

LBS Network Developments Construction Management Plans

LBS CCTV - Public Space Surveillance

LBS Arboricultural Services Team

LBS Community Infrastructure Team

LBS Urban Forester

LBS Waste Management Team

LBS Planning Policy

LBS Building Control Division

LBS Design And Conservation Team

LBS Transport Policy Team

LBS Archaeologist

LBS Local Economy

LBS Ecology Officer

LBS Planning Enforcement Team

LBS Highways Development & Management

LBS Highways Licensing

LBS Housing Regeneration And Delivery Division

Statutory and non-statutory organisations

Royal Parks

City Of Westminster

London Borough Of Lambeth

Active Travel England

South East London Integrated Care Board (ICB)

Planning Casework Unit

NHS London Healthy Urban Development Unit

UK Power Networks

HSE Fire Risk Assessments

Civil Aviation Authority

Transport For London

Transport For London

Thames Water

Environment Agency

Historic England - Heritage

London Fire & Emergency Planning Authority

London Underground

Natural England - London Region & South East Region

Network Rail

Metropolitan Police Service (Designing Out Crime)

Neighbour and local groups consulted:

214 Metro Central Heights 119 Newington Causeway L

212 Metro Central Heights 119 Newington Causeway L

211 Metro Central Heights 119 Newington Causeway L

194 Metro Central Heights 119 Newington Causeway L

183 Metro Central Heights 119 Newington Causeway L

175 Metro Central Heights 119 Newington Causeway L

152 Metro Central Heights 119 Newington Causeway L

138 Metro Central Heights 119 Newington Causeway L

82 Metro Central Heights 119 Newington Causeway Lo

134 Metro Central Heights 119 Newington Causeway L

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31 Metro Central Heights 119 Newington Causeway Lo

27 Metro Central Heights 119 Newington Causeway Lo

21 Metro Central Heights 119 Newington Causeway Lo

11 Metro Central Heights 119 Newington Causeway Lo

Flat 10 West Combe Apartments 123 Newington Causew

Unit 6A 10 Keyworth Street London Southwark SE1 6N

Unit 3F 10 Keyworth Street London Southwark SE1 6N

Unit 3A 10 Keyworth Street London Southwark SE1 6N

Unit 2F 10 Keyworth Street London Southwark SE1 6N

Unit 2C 10 Keyworth Street London Southwark SE1 6N

Unit 1E 10 Keyworth Street London Southwark SE1 6N

Flat 59 Perronet House Gaywood Estate Princess Str

Apartment 1704 251 Southwark Bridge Road London So

Flat B 8 Gaywood Street London Southwark SE1 6HG

Apartment 706 251 Southwark Bridge Road London Sou

Apartment 608 251 Southwark Bridge Road London Sou

Apartment 409 251 Southwark Bridge Road London Sou

89 Metro Central Heights 119 Newington Causeway Lo

136 Metro Central Heights 119 Newington Causeway L

128 Metro Central Heights 119 Newington Causeway L

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Unit 6E 10 Keyworth Street London Southwark SE1 6N

Unit 6B 10 Keyworth Street London Southwark SE1 6N

Unit 5A 10 Keyworth Street London Southwark SE1 6N

Unit 4B 10 Keyworth Street London Southwark SE1 6N

Unit 3E 10 Keyworth Street London Southwark SE1 6N

Flat 7 44 London Road London Southwark SE1 6JW

Apartment 3505 251 Southwark Bridge Road London So

Apartment 3207 251 Southwark Bridge Road London So

72 London Road London Southwark SE1 3PA

Apartment 1909 251 Southwark Bridge Road London So

Apartment 1708 251 Southwark Bridge Road London So

Apartment 1302 251 Southwark Bridge Road London So

Unit 2a07 South Bank Technopark 90 London Road Lon

Apartment 808 251 Southwark Bridge Road London Sou

Apartment 1001 251 Southwark Bridge Road London So

Flat A 18 Gaywood Street London Southwark SE1 6HG

Apartment 2107 251 Southwark Bridge Road London So

Apartment 3008 251 Southwark Bridge Road London So

Apartment 1409 251 Southwark Bridge Road London So

Apartment 1311 251 Southwark Bridge Road London So

Apartment 901 251 Southwark Bridge Road London Sou

Flat B 22 Gaywood Street London Southwark SE1 6HG

Apartment 2807 251 Southwark Bridge Road London So

Apartment 2502 251 Southwark Bridge Road London So

Flat 4 Perronet House Gaywood Estate Princess Stre

Flat 25 Perronet House Gaywood Estate Princess Str

Student Union Satellite Library Shop Southwark Bri

Basement To Seventh Floors Eileen House 80 - 94 Ne

Flat 88 Perronet House Gaywood Estate Princess Str

10B Gaywood Street London Southwark SE1 6HG

Flat 8 West Combe Apartments 123 Newington Causewa

74 London Road London Southwark SE1 6LW

250 Southwark Bridge Road London Southwark SE1 6NJ

Flat 38 Perronet House Gaywood Estate Princess Str

Apartment 908 251 Southwark Bridge Road London Sou

Apartment 2009 251 Southwark Bridge Road London So

Apartment 905 251 Southwark Bridge Road London Sou

Flat 4 44 London Road London Southwark SE1 6JW

Unit 2b01 South Bank Technopark 90 London Road Lon

Flat 22 Perronet House Gaywood Estate Princess Str

Flat B 16 Gaywood Street London Southwark SE1 6HG

32 Princess Street London Southwark SE1 6HJ

Apartment 1806 251 Southwark Bridge Road London So

Apartment 1702 251 Southwark Bridge Road London So

Apartment 1504 251 Southwark Bridge Road London So

Flat B 9 Princess Street London Southwark SE1 6HH

Flat 71 Perronet House Gaywood Estate Princess Str

Flat 64 Perronet House Gaywood Estate Princess Str

Flat 60 Perronet House Gaywood Estate Princess Str

Flat 50 Perronet House Gaywood Estate Princess Str

Flat B 11 Princess Street London Southwark SE1 6HH

Apartment 2905 251 Southwark Bridge Road London So

Apartment 2903 251 Southwark Bridge Road London So

Apartment 3305 251 Southwark Bridge Road London So

Apartment 1107 251 Southwark Bridge Road London So

Apartment 1006 251 Southwark Bridge Road London So

Apartment 1004 251 Southwark Bridge Road London So

Apartment 408 251 Southwark Bridge Road London Sou

Apartment 403 251 Southwark Bridge Road London Sou

Apartment 305 251 Southwark Bridge Road London Sou

Apartment 2407 251 Southwark Bridge Road London So

Apartment 2304 251 Southwark Bridge Road London So

Apartment 2210 251 Southwark Bridge Road London So

Flat 17 Perronet House Gaywood Estate Princess Str

Flat 2 West Combe Apartments 123 Newington Causewa

Flat 6 West Combe Apartments 123 Newington Causewa

Unit 2a13 South Bank Technopark 90 London Road Lon

Elephant And Castle Public House 121 Newington Cau

40 London Road London Southwark SE1 6JW

39 London Road London Southwark SE1 6JW

101 Newington Causeway London Southwark SE1 6BN

15 Gaywood Street London Southwark SE1 6HG

11 Gaywood Street London Southwark SE1 6HG

Flat A 17 Princess Street London Southwark SE1 6HH

42 Princess Street London Southwark SE1 6HJ

Flat 73 Perronet House Gaywood Estate Princess Str

Flat 72 Perronet House Gaywood Estate Princess Str

Flat 58 Perronet House Gaywood Estate Princess Str

Flat 52 Perronet House Gaywood Estate Princess Str

Flat 49 Perronet House Gaywood Estate Princess Str

Flat 7 Perronet House Gaywood Estate Princess Stre

82 Newington Causeway London Southwark SE1 6DE

Flat 6 44 London Road London Southwark SE1 6JW

Flat 1 44 London Road London Southwark SE1 6JW

38 London Road London Southwark SE1 6JW

Flat 14 Perronet House Gaywood Estate Princess Str

Flat 12 Laurie House Gaywood Estate Gaywood Street

Flat A 13 Princess Street London Southwark SE1 6HH

Flat A 16 Gaywood Street London Southwark SE1 6HG

20 Princess Street London Southwark SE1 6HJ

Flat 70 Perronet House Gaywood Estate Princess Str

Flat 56 Perronet House Gaywood Estate Princess Str

Flat 45 Perronet House Gaywood Estate Princess Str

Flat 26 Perronet House Gaywood Estate Princess Str

Flat 18 Perronet House Gaywood Estate Princess Str

Apartment 3401 251 Southwark Bridge Road London So

Apartment 3307 251 Southwark Bridge Road London So

Apartment 803 251 Southwark Bridge Road London Sou

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10A Gaywood Street London Southwark SE1 6HG

Unit 2a22 South Bank Technopark 90 London Road Lon

Unit 2b12 South Bank Technopark 90 London Road Lon

Unit 2a06 South Bank Technopark 90 London Road Lon

Flat 4 West Combe Apartments 123 Newington Causewa

Apartment 3004 251 Southwark Bridge Road London So

Flat 30 Perronet House Gaywood Estate Princess Str

Flat 23 Perronet House Gaywood Estate Princess Str

Apartment 3302 251 Southwark Bridge Road London So

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Apartment 810 251 Southwark Bridge Road London Sou

Unit 2b18 South Bank Technopark 90 London Road Lon

Unit 2a35 South Bank Technopark 90 London Road Lon

Unit 2d06 South Bank Technopark 90 London Road Lon

Flat 3 Laurie House Gaywood Estate Gaywood Street

Unit 11B Elephant Arcade 50 London Road London Sou

Suite 307 Third Floor 241 Southwark Bridge Road Lo

Fifth Floor 241 Southwark Bridge Road London South

398A Metro Central Heights 119 Newington Causeway

368A Metro Central Heights 119 Newington Causeway

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Suite 301 Third Floor 241 Southwark Bridge Road Lo

Flat 9 West Combe Apartments 123 Newington Causewa

Flat 8 Laurie House Gaywood Estate Gaywood Street

Suite 302 Third Floor 241 Southwark Bridge Road Lo

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Unit 6D 10 Keyworth Street London Southwark SE1 6N

Unit 5E 10 Keyworth Street London Southwark SE1 6N

Flat 11 Laurie House Gaywood Estate Gaywood Street

Unit 4D 10 Keyworth Street London Southwark SE1 6N

Unit 2B 10 Keyworth Street London Southwark SE1 6N

Unit 1D 10 Keyworth Street London Southwark SE1 6N

Apartment 304 251 Southwark Bridge Road London Sou

Unit 2d07 South Bank Technopark 90 London Road Lon

Apartment 2808 251 Southwark Bridge Road London So

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Flat 11 Perronet House Gaywood Estate Princess Str

Unit 2c09 South Bank Technopark 90 London Road Lon

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Flat 24 Perronet House Gaywood Estate Princess Str

Apartment 3402 251 Southwark Bridge Road London So

Apartment 3202 251 Southwark Bridge Road London So

Apartment 2504 251 Southwark Bridge Road London So

Apartment 2710 251 Southwark Bridge Road London So

Apartment 1511 251 Southwark Bridge Road London So

Flat 57 Perronet House Gaywood Estate Princess Str

38 Princess Street London Southwark SE1 6HJ

19 Gaywood Street London Southwark SE1 6HG

Apartment 1612 251 Southwark Bridge Road London So

Apartment 1609 251 Southwark Bridge Road London So

Apartment 1602 251 Southwark Bridge Road London So

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Flat 53 Perronet House Gaywood Estate Princess Str

Flat A 19 Princess Street London Southwark SE1 6HH

Apartment 3404 251 Southwark Bridge Road London So

Apartment 3106 251 Southwark Bridge Road London So

Apartment 2508 251 Southwark Bridge Road London So

Apartment 2310 251 Southwark Bridge Road London So

Flat 41 Perronet House Gaywood Estate Princess Str

Apartment 2010 251 Southwark Bridge Road London So

Flat 33 Perronet House Gaywood Estate Princess Str

Unit 1a04 South Bank Technopark 90 London Road Lon

21 Gaywood Street London Southwark SE1 6HG

Flat 12 Perronet House Gaywood Estate Princess Str

Flat A 11 Princess Street London Southwark SE1 6HH

Flat B 14 Gaywood Street London Southwark SE1 6HG

Flat 82 Perronet House Gaywood Estate Princess Str

Flat 76 Perronet House Gaywood Estate Princess Str

Flat 75 Perronet House Gaywood Estate Princess Str

Flat 66 Perronet House Gaywood Estate Princess Str

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48 St Georges Road London Southwark SE1 6ET

Wetherspoons Metro Central Heights 119 Newington C

Suite 102 First Floor 241 Southwark Bridge Road Lo

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Unit 5F 10 Keyworth Street London Southwark SE1 6N

Unit 5C 10 Keyworth Street London Southwark SE1 6N

Apartment 2509 251 Southwark Bridge Road London So

41 London Road London Southwark SE1 6JW

Unit 2d35 South Bank Technopark 90 London Road Lon

Flat 65 Perronet House Gaywood Estate Princess Str

Apartment 1205 251 Southwark Bridge Road London So

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Flat 46 Perronet House Gaywood Estate Princess Str

Apartment 2608 251 Southwark Bridge Road London So

Apartment 1610 251 Southwark Bridge Road London So

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Flat A 12 Gaywood Street London Southwark SE1 6HG

Apartment 906 251 Southwark Bridge Road London Sou

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Flat 62 Perronet House Gaywood Estate Princess Str

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Apartment 2707 251 Southwark Bridge Road London So

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Flat 35 Perronet House Gaywood Estate Princess Str

Unit 5 Perronet House Gaywood Estate Princess Stre

South Bank University 21 Keyworth Street London So

First Floor Flat Southwark Citadel 1 Princess Stre

34 London Road London Southwark SE1 6JW

24 Gaywood Street London Southwark SE1 6HG

23 Gaywood Street London Southwark SE1 6HG

17 Gaywood Street London Southwark SE1 6HG

Flat A 15 Princess Street London Southwark SE1 6HH

30 Princess Street London Southwark SE1 6HJ

Flat 63 Perronet House Gaywood Estate Princess Str

Flat 44 Perronet House Gaywood Estate Princess Str

Apartment 804 251 Southwark Bridge Road London Sou

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10 Keyworth Street London Southwark SE1 6NG

70 London Road London Southwark SE1 6LW

Unit 5 Elephant Arcade 50 London Road London South

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Sixth Floor 241 Southwark Bridge Road London South

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Suite 105 First Floor 241 Southwark Bridge Road Lo

Unit 1 Elephant Arcade 50 London Road London South

Suite 306 Third Floor 241 Southwark Bridge Road Lo

Suite 106 First Floor 241 Southwark Bridge Road Lo

Suite 104 First Floor 241 Southwark Bridge Road Lo

Fourth Floor 241 Southwark Bridge Road London Sout

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46 St Georges Road London Southwark SE1 6ET

Unit 1C 10 Keyworth Street London Southwark SE1 6N

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Unit 5B 10 Keyworth Street London Southwark SE1 6N

Unit 3C 10 Keyworth Street London Southwark SE1 6N

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Apartment 1510 251 Southwark Bridge Road London So

Apartment 1201 251 Southwark Bridge Road London So

Apartment 2201 251 Southwark Bridge Road London So

Apartment 3502 251 Southwark Bridge Road London So

43 London Road London Southwark SE1 6JW

Apartment 1307 251 Southwark Bridge Road London So

Flat 16 Perronet House Gaywood Estate Princess Str

Apartment 1812 251 Southwark Bridge Road London So

Flat 6 Perronet House Gaywood Estate Princess Stre

28 Princess Street London Southwark SE1 6HJ

Flat 9 Laurie House Gaywood Estate Gaywood Street

Apartment 1211 251 Southwark Bridge Road London So

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Flat 15 Laurie House Gaywood Estate Gaywood Street

Flat 13 Laurie House Gaywood Estate Gaywood Street

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Flat 69 Perronet House Gaywood Estate Princess Str

Flat 67 Perronet House Gaywood Estate Princess Str

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Flat 43 Perronet House Gaywood Estate Princess Str

Flat 29 Perronet House Gaywood Estate Princess Str

Flat 15 Perronet House Gaywood Estate Princess Str

37 London Road London Southwark SE1 6JW

Students Union Building South Bank University Keyw

Flat 90 Perronet House Gaywood Estate Princess Str

Unit 1a03 South Bank Technopark 90 London Road Lon

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Flat 86 Perronet House Gaywood Estate Princess Str

Flat 84 Perronet House Gaywood Estate Princess Str

33 London Road London Southwark SE1 6JW

Flat 7 Laurie House Gaywood Estate Gaywood Street

Flat 17 Laurie House Gaywood Estate Gaywood Street

Apartment 2102 251 Southwark Bridge Road London So

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Flat 6 Laurie House Gaywood Estate Gaywood Street

Apartment 2203 251 Southwark Bridge Road London So

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Flat 10 Perronet House Gaywood Estate Princess Str

Flat 4 Laurie House Gaywood Estate Gaywood Street

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Flat 10 Laurie House Gaywood Estate Gaywood Street

Apartment 805 251 Southwark Bridge Road London Sou

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Flat 79 Perronet House Gaywood Estate Princess Str

Flat 74 Perronet House Gaywood Estate Princess Str

Apartment 3303 251 Southwark Bridge Road London So

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Flat 31 Perronet House Gaywood Estate Princess Str

Flat 8 44 London Road London Southwark SE1 6JW

Unit 2d03 South Bank Technopark 90 London Road Lon

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35 London Road London Southwark SE1 6JW

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Flat 1 Laurie House Gaywood Estate Gaywood Street

Flat A 9 Princess Street London Southwark SE1 6HH

Flat B 20 Gaywood Street London Southwark SE1 6HG

40 Princess Street London Southwark SE1 6HJ

Flat 40 Perronet House Gaywood Estate Princess Str

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Apartment 1903 251 Southwark Bridge Road London So

Flat A 20 Gaywood Street London Southwark SE1 6HG

Flat 16 Laurie House Gaywood Estate Gaywood Street

Flat B 12 Gaywood Street London Southwark SE1 6HG

Flat A 22 Gaywood Street London Southwark SE1 6HG

26 Princess Street London Southwark SE1 6HJ

Flat 80 Perronet House Gaywood Estate Princess Str

Flat 68 Perronet House Gaywood Estate Princess Str

Flat 61 Perronet House Gaywood Estate Princess Str

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Unit 1 Metro Central Heights 119 Newington Causewa

Flat 5 West Combe Apartments 123 Newington Causewa

Suite 304 Third Floor 241 Southwark Bridge Road Lo

Suite 303 Third Floor 241 Southwark Bridge Road Lo

Suite 108 First Floor 241 Southwark Bridge Road Lo

Suite 101 First Floor 241 Southwark Bridge Road Lo

Ground Floor 241 Southwark Bridge Road London Sout

Second Floor 251 Southwark Bridge Road London Sout

Flat 12 West Combe Apartments 123 Newington Causew

Flat 11 West Combe Apartments 123 Newington Causew

379A Metro Central Heights 119 Newington Causeway

358A Metro Central Heights 119 Newington Causeway

Apartment 1210 251 Southwark Bridge Road London So

Apartment 1711 251 Southwark Bridge Road London So

Apartment 1603 251 Southwark Bridge Road London So

Apartment 1506 251 Southwark Bridge Road London So

Apartment 1108 251 Southwark Bridge Road London So

Apartment 1101 251 Southwark Bridge Road London So

243 Southwark Bridge Road London Southwark SE1 6FP

Apartment 3604 251 Southwark Bridge Road London So

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Unit 3D 10 Keyworth Street London Southwark SE1 6N

Unit 3B 10 Keyworth Street London Southwark SE1 6N

Unit 1A 10 Keyworth Street London Southwark SE1 6N

Flat 78 Perronet House Gaywood Estate Princess Str

Apartment 1005 251 Southwark Bridge Road London So

Apartment 508 251 Southwark Bridge Road London Sou

Apartment 3005 251 Southwark Bridge Road London So

Flat 9 Perronet House Gaywood Estate Princess Stre

Apartment 2708 251 Southwark Bridge Road London So

Flat 83 Perronet House Gaywood Estate Princess Str

Flat 77 Perronet House Gaywood Estate Princess Str

Apartment 2307 251 Southwark Bridge Road London So

Apartment 3603 251 Southwark Bridge Road London So

Flat B 18 Gaywood Street London Southwark SE1 6HG

Apartment 2402 251 Southwark Bridge Road London So

Apartment 2302 251 Southwark Bridge Road London So

Apartment 2109 251 Southwark Bridge Road London So

Apartment 2006 251 Southwark Bridge Road London So

Apartment 1907 251 Southwark Bridge Road London So

Apartment 1710 251 Southwark Bridge Road London So

Apartment 1607 251 Southwark Bridge Road London So

Apartment 1604 251 Southwark Bridge Road London So

Apartment 707 251 Southwark Bridge Road London Sou

Apartment 606 251 Southwark Bridge Road London Sou

Apartment 601 251 Southwark Bridge Road London Sou

Apartment 3506 251 Southwark Bridge Road London So

Flat 55 Perronet House Gaywood Estate Princess Str

Flat A 8 Gaywood Street London Southwark SE1 6HG

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Unit 4E 10 Keyworth Street London Southwark SE1 6N

Unit 4C 10 Keyworth Street London Southwark SE1 6N

Unit 4A 10 Keyworth Street London Southwark SE1 6N

Unit 2E 10 Keyworth Street London Southwark SE1 6N

Unit 2A 10 Keyworth Street London Southwark SE1 6N

32 London Road London Southwark SE1 6JW

Flat 21 Perronet House Gaywood Estate Princess Str

Unit 1 5 - 9 Rockingham Street London Southwark SE

Flat B 7 Princess Street London Southwark SE1 6HH

Flat 89 Perronet House Gaywood Estate Princess Str

Apartment 1507 251 Southwark Bridge Road London So

Apartment 2909 251 Southwark Bridge Road London So

Apartment 2303 251 Southwark Bridge Road London So

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Flat 8 Perronet House Gaywood Estate Princess Stre

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Flat 5 44 London Road London Southwark SE1 6JW

Flat 85 Perronet House Gaywood Estate Princess Str

Flat 27 Perronet House Gaywood Estate Princess Str

Apartment 1011 251 Southwark Bridge Road London So

Apartment 2610 251 Southwark Bridge Road London So

Apartment 2505 251 Southwark Bridge Road London So

Flat 19 Perronet House Gaywood Estate Princess Str

Flat 13 Perronet House Gaywood Estate Princess Str

Flat 2 44 London Road London Southwark SE1 6JW

Flat 3 West Combe Apartments 123 Newington Causewa

Unit 2b03 South Bank Technopark 90 London Road Lon

Flat 87 Perronet House Gaywood Estate Princess Str

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Flat 1 Perronet House Gaywood Estate Princess Stre

Flat B 15 Princess Street London Southwark SE1 6HH

Flat B 13 Princess Street London Southwark SE1 6HH

Flat A 7 Princess Street London Southwark SE1 6HH

Flat A 14 Gaywood Street London Southwark SE1 6HG

36 Princess Street London Southwark SE1 6HJ

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Unit 4 Metro Central Heights 119 Newington Causewa

1 Tiverton Street London Southwark SE1 6NT

Unit 2 Elephant Arcade 50 London Road London South

Suite 305 Third Floor 241 Southwark Bridge Road Lo

Suite 107 First Floor 241 Southwark Bridge Road Lo

Flat 5 Laurie House Gaywood Estate Gaywood Street

Unit 2b20 South Bank Technopark 90 London Road Lon

9 Rockingham Street London Southwark SE1 6PD

Flat 3 44 London Road London Southwark SE1 6JW

Flat B 19 Princess Street London Southwark SE1 6HH

34 Princess Street London Southwark SE1 6HJ

Flat 54 Perronet House Gaywood Estate Princess Str

Flat 51 Perronet House Gaywood Estate Princess Str

Flat 42 Perronet House Gaywood Estate Princess Str

Flat 36 Perronet House Gaywood Estate Princess Str

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Unit 2a24 South Bank Technopark 90 London Road Lon

Flat 7 West Combe Apartments 123 Newington Causewa

Office 10 Keyworth Street London Southwark SE1 6NG

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Unit 6 Elephant Arcade 50 London Road London South

Flat 14 Laurie House Gaywood Estate Gaywood Street

Unit 9 Elephant Arcade 50 London Road London South

Unit 7 Elephant Arcade 50 London Road London South

Unit 4 Elephant Arcade 50 London Road London South

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APPENDIX 5

Consultation responses received

Internal services

LBS Planning Policy

LBS Transport Policy

LBS Design & Conservation Team [Surgery]

LBS Archaeology

LBS Waste Management

LBS Ecology

LBS Urban Forester

LBS Section 106 Team

LBS Community Infrastructure Levy Team

LBS Environmental Protection

LBS CCTV

LBS Local Economy

Statutory and non-statutory organisations

Metropolitan Police Service

London Borough Lambeth

Flood Risk Management

Active Travel England

NHS

Transport for London

Thames Water

Environmental Agency

Greater London Authority

Natural England

London Fire and Emergency Authority

Network Rail

HSE Fire Risk Assessment

OPEN **MUNICIPAL YEAR 2025-26**

COMMITTEE: **PLANNING COMMITTEE (MAJOR APPLICATIONS) B**

NOTE: Original held in Constitutional Team; all amendments/queries to Gregory Weaver, Constitutional Team, Tel: 020 7525 3667

OPEN

	COPIES		COPIES
MEMBERS		**PLANNING TEAM**	
Councillor Kath Whittam (Vice-Chair)	1	Colin Wilson / Stephen Platts	1
Councillor Sam Dalton	1		
Councillor Ketzia Harper	1		
Councillor Cleo Soanes	1		
Councillor Joseph Vambe	1		
Electronic Copies (No paper)		**COMMUNICATIONS TEAM (Electronic)**	
Councillor Richard Livingstone (Chair)		Eddie Townsend	
Councillor Emily Tester			
Councillor Gavin Edwards (reserve)			
Councillor Esme Hicks (reserve)			
Councillor Nick Johnson (reserve)			
Councillor Jason Ochere (reserve)			
Councillor Reginald Popoola (reserve)			
Councillor Catherine Rose (reserve)			
Councillor Martin Seaton (reserve)			
		LEGAL TEAM	
		Kamil Dolebski	1
MEMBER OF PARLIAMENT (Electronic)			
Neil Coyle MP, House of Commons, London, SW1A 0AA		**CONSTITUTIONAL TEAM**	
Miatta Fahnbulleh MP, House of Commons, London SW1A 0AA		Gregory Weaver (incl. chair's copy)	2
Helen Hayes MP, House of Commons, London, SW1A 0AA		**TOTAL PRINT RUN**	9
		List Updated: 2 September 2025	