

Planning Committee (Major Applications) B

Wednesday 5 November 2025

6.30 pm

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

Membership

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

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

Contact

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

Members of the committee are summoned to attend this meeting

Althea Loderick

Chief Executive

Date: 28 October 2025



Planning Committee (Major Applications) B

Wednesday 5 November 2025

6.30 pm

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

Order of Business

Item No.	Title	Page No.
----------	-------	----------

PART A - OPEN BUSINESS

1. APOLOGIES

To receive any apologies for absence.

2. CONFIRMATION OF VOTING MEMBERS

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

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

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

4. DISCLOSURE OF INTERESTS AND DISPENSATIONS

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

5. MINUTES

1 - 9

To approve as a correct record the minutes of the meeting held on 10 September 2025.

6. TO RELEASE £250,000.00 FROM SECTION 106 AGREEMENTS FOR THE DELIVERY OF MANDELA WAY CYCLE INFRASTRUCTURE

10 - 19

Item No.	Title	Page No.
7.	DEVELOPMENT MANAGEMENT	20 - 24
7.1.	24/AP/3621 COBURG HOUSE, 63-67 NEWINGTON CAUSEWAY LONDON, SOUTHWARK, SE16LS	25 - 216

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: 28 October 2025

Planning Committee (Major Applications)

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

1. The reports are taken in the order of business on the agenda.
2. The officers present the report and recommendations and answer points raised by members of the committee.
3. The role of members of the planning committee (major applications) is to make planning decisions openly, impartially, with sound judgement and for justifiable reasons in accordance with the statutory planning framework.
4. The following may address the committee (if they are present and wish to speak) for **not more than 3 minutes each**.

- (a) One representative (spokesperson) for any objectors. If there is more than one objector wishing to speak, the time is then divided within the 3-minute time slot.
- (b) The applicant or applicant's agent.
- (c) One representative for any supporters (who live within 100 metres of the development site).
- (d) Ward councillor (spokesperson) from where the proposal is located.
- (e) The members of the committee will then debate the application and consider the recommendation.

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

5. If there are a number of people who are objecting to, or are in support of, an application or an enforcement of action, you are requested to identify a representative to address the committee. If more than one person wishes to speak, the 3-minute time allowance must be divided amongst those who wish to speak. Where you are unable to decide who is to speak in advance of the meeting, you are advised to meet with other objectors in the foyer of the council offices prior to the start of the meeting to identify a representative. If this is not possible, the chair will ask which objector(s) would like to speak at the point the actual item is being considered.
6. Speakers should lead the committee to subjects on which they would welcome further questioning.

7. Those people nominated to speak on behalf of objectors, supporters or applicants, as well as ward members, should sit on the front row of the public seating area. This is for ease of communication between the committee and the speaker, in case any issues need to be clarified later in the proceedings; it is **not** an opportunity to take part in the debate of the committee.
8. Each speaker should restrict their comments to the planning aspects of the proposal and should avoid repeating what is already in the report. The meeting is not a hearing where all participants present evidence to be examined by other participants.
9. This is a council committee meeting which is open to the public and there should be no interruptions from the audience.
10. No smoking is allowed at committee.
11. Members of the public are welcome to film, audio record, photograph, or tweet the public proceedings of the meeting; please be considerate towards other people in the room and take care not to disturb the proceedings.

Please note:

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

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

Contacts: General Enquiries
 Planning Section
 Environment, Neighbourhoods and Growth
 Tel: 020 7525 5403

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



Planning Committee (Major Applications) B

MINUTES of the OPEN section of the Planning Committee (Major Applications) B held on Wednesday 10 September 2025 at 6.30 pm at Ground Floor Meeting Room G02 - 160 Tooley Street, London SE1 2QH

PRESENT:	Councillor Richard Livingstone (Chair) Councillor Kath Whittam (Vice Chair) Councillor Emily Tester Councillor Joseph Vambe Councillor Martin Seaton Councillor Gavin Edwards
OFFICER SUPPORT:	Colin Wilson (Assistant Director Strategic Development) Kamil Dolebski (Specialist Planning Lawyer) Dipesh Patel (Head of Planning, Strategic Applications) Neil Loubser (Team Leader S106) Tim Cutts (Senior Regeneration Manager) Alex Fish (Senior Planner) Charlotte Brooks-Lawrie (Planning Policy Manager) Emily Tadgell (Senior Transport Planner) Richard Craig (Team Leader, Design and Conservation) Nannette Sakyi (Senior Project Manager) Pan Chong (Planning Team Leader) Gregory Weaver (Constitutional Officer)

1. APOLOGIES

Apologies were received from Councillors Dalton, Harper and Soanes.

2. CONFIRMATION OF VOTING MEMBERS

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

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

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

4. DISCLOSURE OF INTERESTS AND DISPENSATIONS

The following members declared an interest in item:

11.1 – 24/AP/3819 – 301-303 ILBERTON ROAD, LONDON, SE15 1NW

Councillor Richard Livingstone, non-pecuniary, as the site in question was in his ward though he had no pre-determined view on this.

5. MINUTES

RESOLVED:

That minutes for the Planning Committee (Major Applications) B meeting held on 15th July 2025 be approved as a correct record signed by the chair.

6. ADOPTION OF THE CLIMATE AND ENVIRONMENT SUPPLEMENTARY PLANNING DOCUMENT (SPD)

Report: See pages 7-8 (outline report on main agenda) and pages 1-6 (full report) of Supplemental Agenda No.1 (appendices available online)

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

RESOLVED:

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

7. TO RELEASE £101,782.80 FROM SECTION 106 AGREEMENTS FOR THE DELIVERY OF A PLAYGROUND ON THE BELLS GARDEN ESTATE

Report: See pages 9-16 of the main agenda report.

The committee agreed to forego the opening presentation.

There were no questions from committee members.

RESOLVED:

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/108 5	803	Play, Children's Play Equipment and Sports Development	170 Sumner Road SE15 6PQ	£2,043.72
16/AP/470 2	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

8. TO RELEASE £139,927.45 FROM SECTION 106 AGREEMENTS FOR THE DELIVERY OF GREAT SUFFOLK STREET AREA SCHEME - PHASE 2

Report: See pages 17-34 of the main agenda report.

The committee agreed to forego the opening presentation.

There were no questions from committee members.

RESOLVED:

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 Contributio n	S2,1.3 -1.4	25 Lavington Street London Southwark SE1 0NA	£3,308.08	£29,388.08
TOTAL:						£139,927.45

9. TO RELEASE OF £428,834.94 OF S106 FUNDS TO SUPPORT THE DELIVERY OF THE LOST PECK FLOOD ALLEVIATION AND ENVIRONMENTAL ENHANCEMENT SCHEME

Report: See pages 35-55 of the main agenda report.

The committee agreed to forego the opening presentation.

There were no questions from committee members.

RESOLVED:

1. That the Planning Committee (Major Applications) B approves the release of 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 Alleviations and Environmental Improvement Scheme.

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)

Report: See pages 56-65 of the main agenda report.

The committee agreed to forego the opening presentation.

There were no questions from committee members.

RESOLVED:

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.

Plannin g applicat ion referen ce	Profit centre	Spend category	Ward	Address	S106 Contrib ution	Indexa tion	Total Amount
12/AP/1 092	W06635	Bus contribution s	North Walworth	Heygate Estate	£1,100, 000	£270,7 69.24	£1,370,769.2 4
17/AP/3 757	W08425	Bus contribution s	Old Kent Road	60A And 62 Hatcham Road	£56,600 .90	£1,546 .36	£58,147.26
20/AP/0 039	W09125	Bus contribution s	Old Kent Road	43 Glengall Road And 1 Bianca Road	£729,00 0	£51,11 8.90	£780,118.90
18/AP/2 895	W08785	Bus contribution s	Old Kent Road	2 Varcoe Road	£17,760	£3,782 .99	£21,542.99
22/AP/1 221	W09415	Bus contribution s	Old Kent Road	Tustin Estate Land (Phase 1)	£329,40 0.00	n/a	£329,400.00
19/AP/1 773	W09195	Bus contribution s	Old Kent Road	227-255 Ilderton Road	£683,10 0	£180,3 58.72	£863,458.72
20/AP/1 329	W09475	Bus contribution s	Old Kent Road	313-349 Ilderton Road	£156,60 0	£28,64 6.34	£185,246.34
22/AP/0 554	W09785	Bus contribution s	Old Kent Road	The Ledbury Estate	£64,800	£3,031 .06	£67,831.06
20/AP/2 701	W09495	Bus contribution s	Old Kent Road	671-679 Old Kent Road	£288,90 0	£42,72 3.65	£331,623.65

Planning applicati on referenc e	Profit centre	Spend category	War d	Address	S106 Contributio n	Indexati on	Total Amount
17/AP/46 12	W085 25	Bus contributi ons	Old Kent Road	49-53 Glengall Road	£162,900	£29,814 .89	£192,714.89
19/AP/13 22	W093 85	Bus contributi ons	Old Kent Road	840 Old Kent Road	£592,281.24	£0	£592,281.24
19/AP/53 89	W097 45	Bus contributi ons	Chau cer	221 New Kent Road	£234,000	£51,517 .72	£285,517.72
Total							5,078,652.01

11. DEVELOPMENT MANAGEMENT

RESOLVED:

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

11.1 301-303 ILBERTON ROAD LONDON SOUTHWARK SE15 1NW

Planning Application Number: 24/AP/3687

Report: See pages 71-262 of the main agenda.

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.

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

Members put questions to the officers.

There were no objectors present.

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

There were no supporters present.

There were no ward councillors present.

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

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

declared carried.

RESOLVED:

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

11.2 SKIPTON HOUSE, 80 LONDON ROAD, LONDON, SOUTHWARK SE1 6LH

Planning Application Number: 24/AP/3432

Report: 263 – 486 of the main agenda and 1 to 4 of addendum report.

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 E(gi)) 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.”

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

Members put questions to the officers.

Objectors addressed the committee and responded to questions put by members

of the committee.

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

There were no supporters present.

There were no ward councillors present.

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

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

RESOLVED:

1. That planning permission be granted subject to conditions, the applicant entering into an appropriate legal agreement, and referral to the Mayor of London.
2. That the environmental information be taken into account as required by Regulation 26(1) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended); and
3. That the planning committee in making their decision has due regard to the potential equalities impacts that are outlined in this report; and
4. That following the issue 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 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 the Paragraph 427 of this report.

Meeting ended at 10.00 pm

CHAIR:

DATED:

Meeting Name:	Planning Committee (Major Applications) B
Date:	5 November 2025
Report title:	To release £250,000.00 from Section 106 agreements for the delivery of Mandela Way cycle infrastructure
Ward(s) or groups affected:	South Bermondsey, Old Kent Road
Classification:	Open
Reason for lateness (if applicable):	N/A
From:	Transport Policy

RECOMMENDATION(S)

1. That the Planning Committee (Major Applications) A approves the release of the funds amounting to **£250,000.00**, which were paid to the council (pursuant to the terms of the section 106 agreement dated 8 February 2024, which was entered into) in relation to the planning application bearing reference [23/AP/0950](#), and such sums to be applied towards the Mandela Way cycle infrastructure scheme (the “Scheme”).

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. In July 2025, Cabinet approved the adoption of the new S106 and CIL Supplementary Planning Document (SPD) dated July 2025, which provides detailed guidance on the council’s use of planning obligations and CIL.

5. 'The Scheme' consists of design work for the below infrastructure projects, which follows a feasibility study completed by Southwark Council's highways department in November 2023:

Road	Measure
Mandela Way	<ul style="list-style-type: none"> • Addition of bidirectional cycling infrastructure along carriageway • Safety improvements at junctions with Pages Walk, Dunton Road and Rolls Road

6. And should the committee resolve to approve the recommendation (as set out in paragraph 1 above), these sums shall be released to the portfolio holder of the Department of Environment, Neighbourhoods and Growth, to be applied towards the implementation of the Scheme.
7. The Scheme aligns with Southwark's strategic transport objectives as set out in the Streets for People (SfP') strategy, Cycling Plan, Streets for People Delivery Plan, Southwark Council Delivery Plan, Southwark Plan 2022, and Climate Change Strategy.

CONSULTATION

8. Since the scheme is still in the early stages of design, no public consultation has taken place at this point. Approval of funding will enable community engagement to help shape the design.
9. Once the design has been finalised, further statutory consultation will be undertaken.

KEY ISSUES FOR CONSIDERATION

10. As set out (in paragraph 1) above, the council is in receipt of funds amounting to £250,000 ("Financial Contributions"), which were paid to the council pursuant to the terms of the legal agreement noted above.
11. The Scheme seeks to address road safety issues on Mandela Way caused by the distribution hub, while future-proofing the area for the predicted increases in cycling.
12. Mandela Way is part of the Old Kent Road Area Action Plan, a Masterplan document that has been subject to extensive public consultation. The OKR AAP recognises that 'the transport character of the Old Kent Road OA is one of car dominance', and that new cycling links are required to improve air quality and safety, reduce congestion and encourage active travel.
13. Between 2022 and 2024, the council commissioned a 'Sub Area Design Code' for Mandela Way and other key roads – these codes provide additional design

guidance in respect of the Sub Area masterplans. Consultation for the design codes was open for all to comment on; the council held seven events aimed at local residents, businesses, and landowners, and received 100 responses.

14. The 2024 OKR AAP draft states: 'The design code introduced some changes to the 2020 sub area masterplan in response to feedback to consultation particularly in respect of industrial residential co-location. In order to ensure servicing access to commercial uses in the future, Mandela Way will be retained as a two way principle service route'.
15. Key elements of the Design Codes have been incorporated into the Sub Area Design Guidance of the Submission Draft AAP.
16. According to the OKR AAP Masterplan, the Mandela Way area (OKR 3) will see an increase of 1,955 homes, 3,089 jobs and 1 primary school. The population increase that results from this development is predicted to significantly increase the number of cycle trips on Mandela Way itself. Cycling safety improvements, such as segregated cycle lanes, are necessary to ensure cyclists can move safely alongside servicing vehicles.
17. Alongside new cycling infrastructure, Mandela Way will receive additional Healthy Streets upgrades, such as new planting and improved pavements. A new major park of 1.45 ha, Mandela Way Park, is also proposed to help deliver the Greener Belt and support the intensification of land uses.
18. The Mandela Way cycle infrastructure would act as a key 'Town Centre Link', providing direct access to Old Kent Road.
19. The overall project seeks to achieve the following objectives:
 - Improve cyclist safety on Mandela Way to support Streets for People objectives
 - Provide a high-quality and convenient link to the OKR Town Centre and green spaces
 - Support the increase in cycling resulting from new developments and intensification of land uses
20. Mandela Way and Rolls Road form part of the cycling network that the council has committed to deliver as part of its Streets for People Plan. Delivery of this Scheme will form a part of the delivery of the commitments set out in the Streets for People policies.
21. The recommendation set out above (in paragraph 1) is to release the Financial Contributions, which are to be applied towards the consultation and design work of the Scheme. Without this funding, the serious road safety concerns (i.e. conflicts between large servicing vehicles and cyclists) and potential cyclist capacity issues on Mandela Way would not be addressed, and the council would not be fulfilling its Streets for People promise to make cycling safer and more accessible. Such a decision will also negatively impact the delivery of the Old Kent Road Masterplan and Area Action Plan, which requires active travel improvements to the Mandela Way area.

Policy framework implications

22. The recommendations in this report align with the pledges and objectives outlined in the SfP strategy (approved by Cabinet in July 2023), which details the council's ongoing commitment and ambition for healthier neighbourhoods, cleaner air, thriving town centres, and safer roads. The relevant SfP pledges are:

- Your street will have improvements to make it cleaner, greener and safer, chosen by you.

23. The relevant SfP policy objectives are:

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

The proposed improvements reduce carriageway widths and provide segregated cycle infrastructure to facilitate active travel. Better cycling infrastructure will assist residents in making more journeys by bicycle instead of by car.

- **Objective 4 – improve safety and security for everyone using our streets.**

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

- **Objective 5 – Make walking, cycling and wheeling easier**

A segregated cycle lane will make cycling easier by reducing the amount of road space shared by cyclists and large vehicles. Cyclists will not need to compete with LGVs for space in a segregated lane.

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

Children attending the new primary school in the Mandela Way district (OKR 3) will benefit from a segregated cycleway, which reduces the likelihood of conflict between cyclists and vehicles. With well-designed infrastructure in place, parents may feel more confident bringing their child to school by bike rather than car.

- **Objective 9 – Reduce the impact of freight on our streets and support businesses to operate sustainably and efficiently**

The new cycle infrastructure will assist the partial transition from goods vehicles to cargo bikes for delivery and servicing trips. Reducing the number of LGVs on Mandela Way will improve safety for all, reduce air pollution and improve congestion.

- **Objective 11 – Reduce emissions from transport and improve air quality**

Providing a better cycling experience will reduce private vehicle reliance, and more journeys by bicycle will reduce emissions from transport and improve air quality.

24. The cycle infrastructure 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
- 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
- Rolling out more segregated cycle lanes
- Reducing traffic near schools

25. The Scheme is consistent with the actions contained in the council's climate action plan. This is a strategy that commits Southwark to becoming 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”.

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

Community impact statement

26. At this stage, the Scheme will only involve design work. The infrastructure will not be implemented until community impacts have been considered.

27. Implementing any transport project brings a variety of community impacts. All transport schemes aim to enhance the safety and security of vulnerable groups and support economic growth by improving the overall transport system and increasing accessibility.

28. As set out above, the Scheme aligns with the objectives in the SfP strategy by providing a better environment for cycling.

29. Additional work will be undertaken during the next design stage to review whether any further accessibility improvements can be made as part of this Scheme's detailed design.

Equalities (including socio-economic) impact statement

30. 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.

31. An Equality Impact and Needs Assessment (the “EINA”) will be carried out after the Scheme is designed and before it is implemented. To fulfil the council’s PSED, the EINA will assess the impact the infrastructure has on groups with protected characteristics.

32. 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.

Health impact statement

33. Streets for People objectives focus on increasing walking, wheeling, and cycling while decreasing private car use, all of which improve health outcomes through addressing toxic air pollution, the climate emergency and the inactivity crisis. 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 244 residents based in London Bridge and West Bermondsey ward. The large-scale engagement assessed residents’ transport uses and top concerns and interests (including air pollution, safety while traveling on foot or by bicycle, etc.). These responses were analysed and have contributed to the development of the Scheme.

34. This Scheme supports Vision Zero, TfL’s mission to have zero people killed or seriously injured on London’s streets by 2041. Southwark’s commitment to Vision Zero was published in Streets for People in 2023. Reducing conflict between cyclists, pedestrians, and vehicles will reduce road traffic accidents.

35. Safer cycling 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.

Climate change implications

36. The measures support the aims of the council’s Climate Action Plan (adopted September 2025) under Priority 2 – Streets and transport. Key aims of the Council’s Climate Action Plan include ‘[making] the air in our neighbourhoods

cleaner and [reducing] carbon emissions by making walking, cycling and wheeling the first choice to getting around the borough, instead of using private vehicles'. 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.

37. 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 will help reduce reliance on car journeys. The prioritisation of streets for cyclists aligns with the Climate Change Strategy objective.
38. 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.
39. A carbon cost budget has been 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

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

Financial implications

41. The estimated cost for the delivery of the design stage is less than £250k. The remaining funds released for the Scheme will be allocated towards its implementation.
42. The Financial Contributions can only be used towards 'a feasibility study for and works to implement improvements to cycle infrastructure on Mandela Way and junctions from Pages Walk and Dunton Road and the Rolls Road junction'. The council cannot spend the funds on alternative projects.
43. Once this report is approved, a new capital cost code will be created for 'X' in ESL Department's capital programme, as per Highways Manager's request and budget needs to be added to that new cost code.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Director of Planning and Growth

44. The proposed allocation aligns with the agreement detailed in paragraph 1 and would offer suitable mitigation for the impacts of both current and future developments.

Assistant Chief Executive – Governance and Assurance (SS260925)

45. Under Part 3 (F) of the council's constitution it is the function of the planning committee (major applications) to, amongst other things, consider the expenditure of funds over £100,000 of strategic importance secured through legal agreements under section 106 of the Town and Country Planning Act 1990.
46. Financial contributions secured in section 106 agreements must be expended in accordance with: - (a) the terms of the specific agreements; and (b) the legal tests below which are enshrined in Regulation 122 (2) of The Community Infrastructure Levy Regulations 2010 in that they must be: - (i) necessary to make the development acceptable in planning terms; (ii) directly related to the development; and (ii) fairly and reasonably related in scale and kind to the development.
47. The Equality Act 2010 introduced the PSED, which merged existing race, sex and disability equalities duties and extended them to include other protected characteristics; namely age, gender reassignment, pregnancy and maternity, religion and belief and sex and sexual orientation, including marriage and civil partnership.
48. In summary those subject to the equality duty, which includes the council, must in the exercise of their functions: (i) have due regard to the need to eliminate unlawful discrimination, harassment and victimisation; and (ii) foster good relations between people who share a protected characteristic and those who do not.
49. Officers consider that the recommendation set out in paragraph 1 of this report (if so approved) will not have a disproportionate negative effect on any particular protected group under the Equality Act 2010. In any event, as mentioned above, an EINA will be carried out after the Scheme is designed but before it is implemented. This will assist the council in further carrying out its PSED in regard to the Scheme.
50. The Human Rights Act 1998 imposes a duty on the council as a public authority to apply the European Convention on Human Rights; as a result, the council must not act in a way which is incompatible with these rights. Such rights include (but are not limited to) Article 8 (respect for private and family life); Article 6 (right to a fair trial) and Article 1 of the First Protocol (right to peaceful enjoyment of property). Officers consider that the recommendation set out in paragraph 1 of this report (if so approved) will not result in a breach of the provisions in the Human Rights Act 1998.

Strategic Director of Resources CAP25/028

51. This report seeks approval to release £250,000 from the Section 106 agreements for improvements to Mandela Way cycle infrastructure as outlined in this report

52. The Strategic Director of Resources notes the resource implications in paragraphs 33 to 34 and the supplementary advice from the Director of Planning & Growth and the Assistant Chief Executive, Governance & Assurance and confirms that the Council has received the related funds and that they are available for the purposes outlined in this report.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
<p>Copies of S106</p> <p>All documents can be accessed online at:</p> <p>Link:</p> <p>https://www.southwark.gov.uk/planning-and-building-control/planning-applications/planning-register-search-view-and-comment-on-planning-applicationsapplications</p>	<p>Southwark Council 160 Tooley Street London SE1 2QH</p>	<p>Neil Loubser 020 7525 5451</p>
<p>Council Delivery Plan</p> <p>https://www.southwark.gov.uk/about-council/how-council-works/policies-plans-and-strategies/council-delivery-plan-and-annual</p>	<p>Southwark Council 160 Tooley Street London SE1 2QH</p>	<p>Tom Robison</p>
<p>Streets for People 2023</p> <p>Streets for People Strategy - Southwark Council</p>	<p>Southwark Council 160 Tooley Street London SE1 2QH</p>	<p>Tom Robison</p>
<p>Climate Action Plan</p>	<p>Southwark Council 160 Tooley Street London SE1 2QH</p>	<p>Tom Sharland 02075250959</p>

APPENDICES

No.	Title
N/A	N/A

AUDIT TRAIL

Cabinet Member	Councilor McAsh – Cabinet Member for Clean Air, Streets and Waste
-----------------------	---

Lead Officer	Stephen Platts, Director of Planning & Growth		
Report Author	Emily Tadgell - Senior Transport Planner, Transport Policy		
Version	Final		
Dated	26.09.2025		
Key Decision?	N/A		
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER			
Officer Title		Comments Sought	Comments Included
Assistant Chief Executive, Governance and Assurance		Yes	Yes
Strategic Director of Resources		Yes	Yes
Director of Planning and Growth		Yes	Yes
Cabinet Member			N/A
Date final report sent to Constitutional Team			22 October 2025

Meeting Name:	Planning Committee (Major Applications) A
Date:	14 October 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.

Community impact statement

- 10. Community impact considerations are contained within each item.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Assistant Chief Executive – Governance and Assurance

- 11. 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.
- 12. 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.

13. 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.
14. 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.
15. The National Planning Policy Framework (NPPF), as amended in December 2024, is a relevant material consideration and should be taken into account in any decision-making.
16. 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.
17. "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."

18. 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

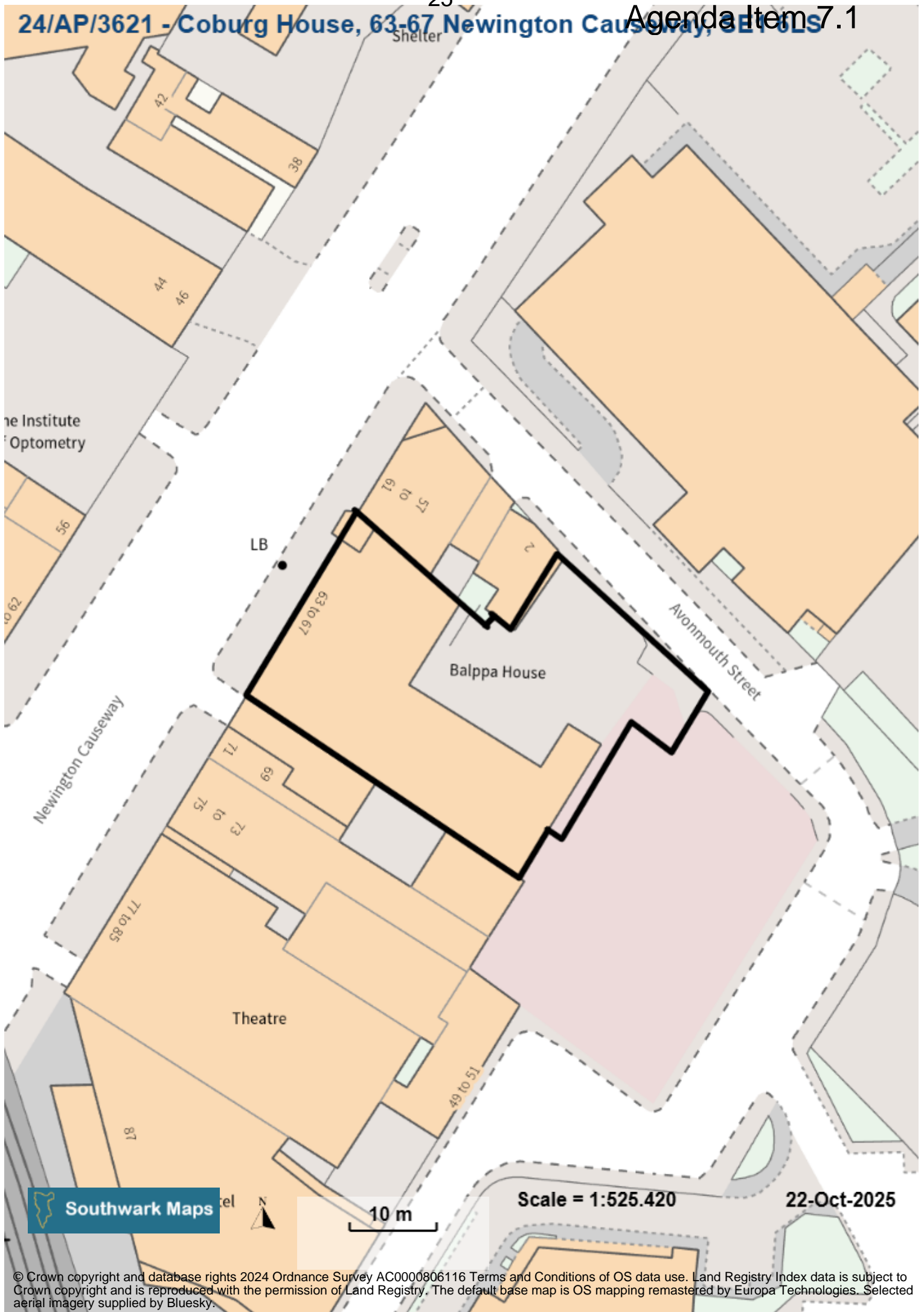
APPENDICES

No.	Title
None	

AUDIT TRAIL

Lead Officer	Chidilim Agada, Head of Constitutional Services		
Report Author	Kamil Dolebski, Specialist Lawyer (Planning) Gerald Gohler, Constitutional Officer		
Version	Final		
Dated	2 October 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			2 October 2025

24/AP/3621 - Coburg House, 63-67 Newington Causeway, SE1 6LS



Contents

RECOMMENDATION	3
EXECUTIVE SUMMARY	4
PLANNING SUMMARY TABLES	5
BACKGROUND INFORMATION.....	7
Site details	7
Details of proposal	14
Planning history of the application site and nearby sites	20
Pre-application engagement and mid-application amendments.....	21
KEY ISSUES FOR CONSIDERATION.....	22
Summary of main issues	22
Legal Context.....	23
Adopted planning policy	23
ASSESSMENT	23
Environmental impact assessment.....	23
Principle of the proposed development in terms of land use.....	24
Affordable Housing and Development Viability.....	32
Quality of residential accommodation.....	34
Design.....	43
Heritage and Townscape	54
Landscaping, trees and urban greening	66
Ecology and Biodiversity	70
Impact of proposal on development potential of nearby land.....	72
Amenity impacts on nearby residential occupiers and the surrounding area.....	72
Archaeology.....	86
Transport and highways.....	86
Environmental matters	92
Energy and sustainability	97
Communications and aviation	103
Health impacts	104
Planning obligations	105
Mayoral and Borough Community Infrastructure Levies	112
Community involvement and engagement	113
Consultation responses from external consultees	116
Consultation responses from internal consultees	123
Community impact and equalities assessment.....	125

Human rights implications	127
CONCLUSION	128
BACKGROUND INFORMATION.....	130
BACKGROUND DOCUMENTS.....	130
APPENDICES	130
AUDIT TRAIL	130

Meeting Name:	Planning Committee (Major Applications) B	
Date:	05 November 2025	
Report title:	<p>Development Management planning application: Application 24/AP/3621 for: Full Planning Permission</p> <p>Address: Coburg House, 63-67 Newington Causeway London, Southwark SE1 6LS</p> <p>Proposal: Demolition of existing building and erection of a building comprising commercial floorspace (Class E), Purpose built student accommodation bedrooms and amenity space (sui generis), refuse and bike stores, internal and external plant, and external landscaping.</p>	
Ward(s) or groups affected:	Chaucer	
Classification:	Open	
Reason for lateness (if applicable):	Not Applicable	
From:	Director of Planning and Growth	
Application Start Date: 16.01.2025		Application Expiry Date:
Earliest Decision Date: 13.02.2025		

RECOMMENDATION

1. That full planning permission be granted, 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 30th April 2026 the Director of Planning and Growth be authorised to refuse

planning permission, if appropriate, for the reasons set out in paragraph 422 of this report.

EXECUTIVE SUMMARY

4. The 0.109 hectare site comprises a part of the land falling within the NSP46 site allocation in the Southwark Plan (2022). The site is within the Elephant and Castle Opportunity Area and the Central Activities Zone, in an area of the highest transport accessibility. It does not sit within a conservation area and does not contain any listed buildings. The site is currently occupied by the Department of Work and Pensions Job centre and another separate private company who use this building as offices. The site allocation recognise that some tall buildings will be necessary to deliver these objectives.
5. The applicant seeks to demolish the existing building and redevelop a purpose-built student accommodation building with flexible employment uses (circa 1,500sqm) on the ground, first and second floor levels. The single building would range from 3 storeys rising to 18 and then 19 storeys.
6. The submission of this application follows a series of pre-application discussions. As a result of which improvements were secured in respect of the detailed design of the buildings and surrounding public realm.
7. In land use terms, the development would result in a minor loss of employment floorspace but would deliver a better quality commercial floorspace including affordable workspace which would bring positive economic benefits to the borough. The applicant had offered the future floorspace to the DWP as well as the adjoining site at Avonmouth House and discussions are still ongoing. The applicant has also committed to assist in helping DWP to find suitable alternative location. The proposals will deliver high quality PBSA which will complement the existing student accommodation nearby and will make a positive contribution to the emerging transformation of the Elephant and Castle Town Centre. A Student Management Plan, to be secured by planning obligation, would ensure the successful long-term management of the premises.
8. The proposed 243 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 £11.05 million because the size of the site does not allow for on-site conventional housing alongside a feasible amount of student housing. This payment-in-lieu is equivalent to 35% affordable housing by habitable room. The payment-in-lieu would be used to directly support the Southwark's Council Homes Programme.
9. Forming an interesting composition and possessing a strong urban character, and with robust and high quality materials specified throughout, the proposed building would achieve an exemplary standard of architectural design. Whilst

there would be 'Less than Substantial' harm to the setting of the Grade II Listed Sessions Courthouse, this is at the lower end of the scale of harm and the development presents public benefits that on balance outweigh this harm. The improved public realm would be more accessible and includes trees and soft landscaping that would also contribute to biodiversity net gain.

10. With regard to amenity and environmental considerations, although the proposal would result in daylight and sunlight impacts at a small number of nearby existing properties that depart from the BRE guidelines, it should be acknowledged that the site is within a dense urban location that is anticipated for redevelopment to deliver the benefits. The applicant's technical assessments, which quantifies and evaluates the scheme's expected impacts accounting for all proposed mitigation, has been assessed by officers in collaboration with specialists commissioned by the Council. The environmental effects can be acceptably managed through planning conditions and obligations.
11. The development would make efficient use of a prominently located and under-utilised site to deliver a high quality and sustainable development that on balance accords with the Council's aspirations for the area. In addition to the economic benefits brought by this proposal, such as the improved employment facility 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.
12. Having given this application careful consideration, officers recommend the application for approval, subject to conditions and completion of a section 106 agreement.

PLANNING SUMMARY TABLES

13.	<u>Commercial</u>			
Use class and description		Existing GIA	Proposed GIA	Change +/-
E [a] to (f) (Retail/dining/services)		501.5	0	
E [g] i) (Office)		1606.5	1,484	-624
E [g] ii) (Research and development)		0	0	
E [g] iii) (Light industrial)		0	0	
E [g] iii) (Affordable workspace)		0	148	
B2 (Industrial)		0	0	
B8 (Storage/Distribution)		0	0	
C1 (Hotel)		0	0	
Sui Generis (PBSA)		0	7,224	

Sui Generis (cycle workshop) 0

Sui Generis (publicly-accessible café) 0

Employment	Existing no.	Proposed no.	Change +/-
Operational jobs (FTE)	25	79	54

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	37.2% improvement on Part L of Building Regs 2021		
Trees Lost	0 x Category A	0 x Category B	0 x Category C
Trees Gained	20		

16.

Greening, Drainage and Sustainable Transport Infrastructure

Criterion	Existing	Proposed	Change +/-
Urban Greening Factor	0	0.34	+0.34
Greenfield Run Off Rate	N/A	2l/s (discharge rate)	N/A
Green/Brown Roof Coverage	0	171	+171
Electric Vehicle Charging Points	0	1	+1
Blue Badge Parking Spaces	0	1	+1
Cycle Parking Spaces	0	204	+204

17.

CIL and Section 106 (or Unilateral Undertaking)

Criterion	Total Contribution
CIL (estimated)	£1,639,628.49.

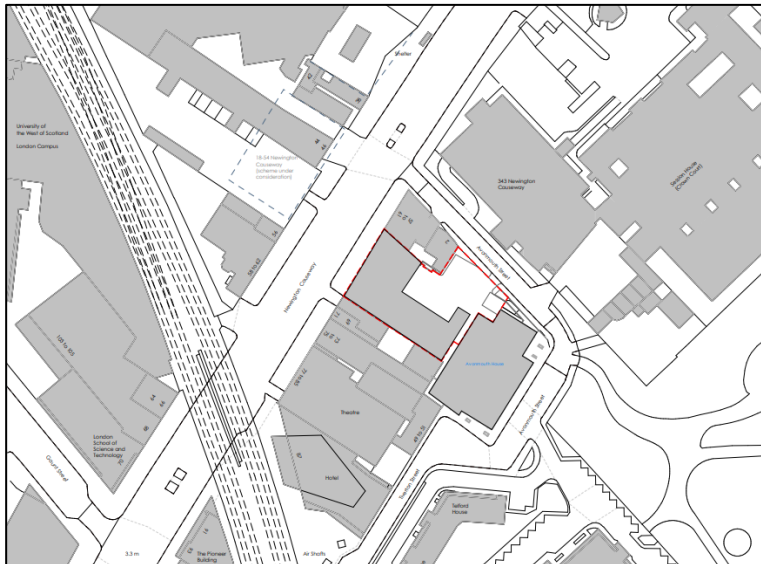
MCIL (estimated)	£521,949.45
SCIL (estimated)	£1,117,679.04
Section 106 Contribution	As per the 'Planning obligations' section of this report

BACKGROUND INFORMATION

Site details

Location and description

18. The site is bound by two roads, sitting on Newington Causeway to the west and Avonmouth Street to the north. To the southwest (rear) is a development site that is being constructed, formerly known as Avonmouth House.



Map: Site Plan

19. Immediately to the north is Balppa House (57-61 Newington Causeway) a five-storey mixed use building consisting of ground floor commercial use and residential use above. There is also No.2 Avonmouth Street immediately to the north, which is a 4 storey block of flats. Along Newington Causeway and to the south of the site there is a block accommodating office use.
20. The 0.109 hectare (Ha) site comprises a 1980s 4 storey office building containing a Job Centre at ground to second floor and a separate office at third floor. The primary access to the building is via Newington Causeway, with a secondary access via Avonmouth Street through a small car parking area. Beyond the site to the southwest, Avonmouth Street becomes Tiverton Street, where a 24 storey hotel known as the Kite Building is located.
21. The surrounding area is distinctly urban in character and comprises a mix of

development densities and uses. Directly opposite to the east is the site known as 'Borough Triangle', which is identified for major mixed-use phased redevelopment and was recently granted planning consent in June 2025 (reference: 24/AP/1958). Borough Triangle currently has a number of buildings on the site with a range of uses, but most notably it is occupied by Mercato Metropolitano – a food hall with temporary permission since 2016. It is worth noting that the planning permission at the Borough Triangle site comprises 4 buildings ranging in height (10, 18, 38 and 44 storeys). This, along with the Avonmouth House development (up to 16 storeys) would change this immediate part of the townscape in the near future. To the south of the site on Newington Causeway the uses are predominantly commercial and cultural including the Southwark Playhouse. The Inner London session court is further to the northeast of the site.

22. There is an area of open space further to the southeast of the site known as Newington Gardens, which is designated as Borough Open Land. It is also an undesignated heritage asset.



Photo: Balppa House (No.57-61 Newington Causeway) at the junction of Newington Causeway and Avonmouth Street. The existing building on the application site is to the right.



Photo: Nos.69-71, Nos.73-75 and Southwark Playhouse are to the right of the existing building on site



Photo: Rear of building with car parking area and adjoining properties No.2 Avonmouth Street and Balppa House



Photo: Rear of site from Avonmouth Street with existing tall buildings visible on Newington Causeway

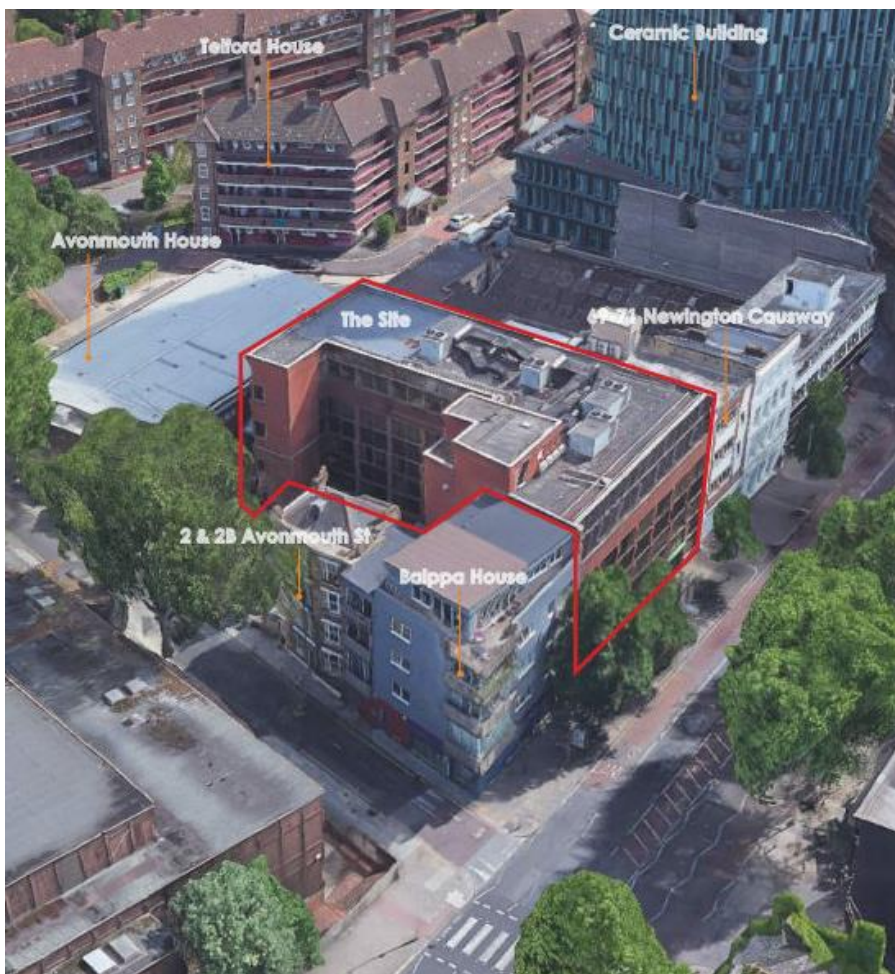


Image: Aerial view of the site and surrounding buildings



Photo: View from Newington Causeway with Avonmouth House under construction

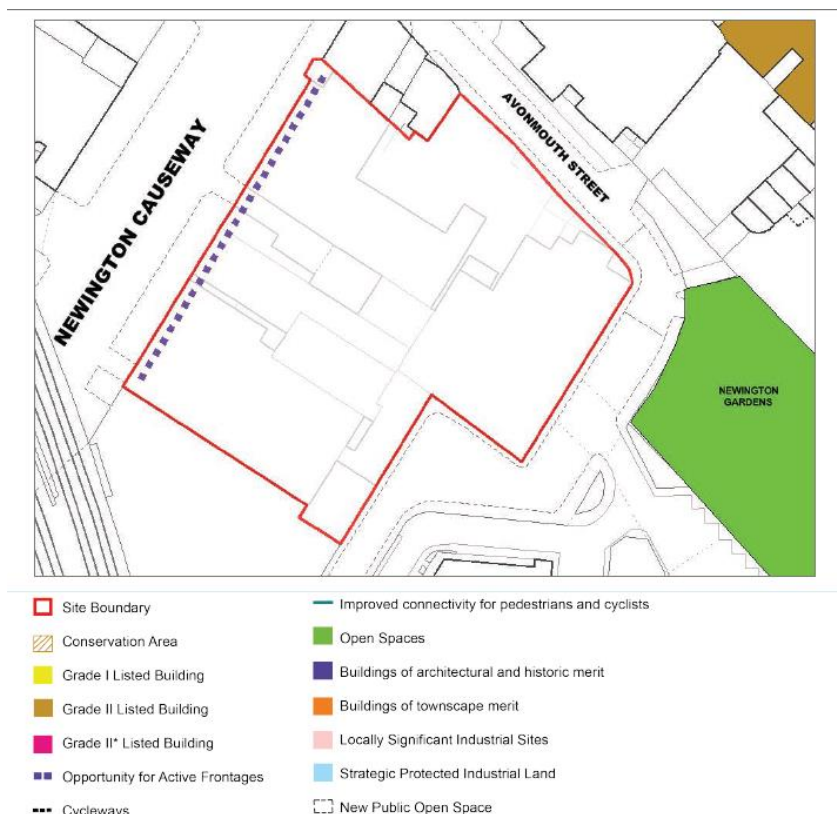
23. The site is very well connected, situated on a main bus route and between Elephant and Castle underground station and Borough underground station. It has a high public transport public accessibility rating (PTAL) of 6b, which is considered to be excellent.
24. The site is not within a conservation area. However, there are conservation areas within the vicinity. The King's Bench Conservation Area is approximately 220m to the north of the site. Liberty of the Mint Conservation Area is also nearby and is 280m northeast from the site. Approximately 225m to the northwest is the Trinity Church Square Conservation Area. Other conservation areas within the vicinity are further afield.
25. There are no statutorily listed buildings on the site, but a Grade II listed building is close by – namely the Inner London Session Court on Newington Causeway to the northeast.



Plan: Map showing the nearby designated and non-designated heritage assets. The site is highlighted in red.

26. In terms of policy designation, the site is within the Central Activities Zone (CAZ), Elephant and Castle Opportunity Area and Elephant and Castle Town Centre and Strategic Cultural Quarter. As it is within the major town centre and opportunity area, this site is in an area that might expect to have tall buildings. It is also within the Hot food takeaway primary school exclusion zone.
27. The site is within an Archaeological Priority Area (North Southwark and Roman Roads). It is within Flood zone 3 and the Air Quality Management Area (AQMA).
28. No London View Management Framework (LVMF) view corridors cross the site, however the LVMF Protected Vista 23A.1 Centre of Bridge over the Serpentine to the Palace of Westminster is identified in the wider area.
29. A borough local view corridor, identified in the Southwark Plan annex 1, passes directly to the east of the site:
 - View 3: The linear view of St Paul's Cathedral along Camberwell Road.

30. The Southwark Plan area vision AV.09 for Elephant and Castle identifies the area as a very accessible important and historic town centre in central London with a wide range of large offices and small businesses, shops, cultural and community facilities. It also notes that it is an attractive destination for visitors with a strong daytime and nighttime economy which provides a range of cultural and entertainment spaces alongside a lively and diverse retail environment for local residents and in particular the area's Latin American community.
31. The site falls within Site Allocation NSP46: 63-85 Newington Causeway. The NSP46 site allocation is slightly larger than the application area as it also includes Avonmouth House, 69-71, 73-75, 77-85 Newington Causeway and 49-51 Tiverton Street. The site application boundary does not include the aforementioned properties as stated they are not included in the planning application boundary.
- The NSP46 site vision states that redevelopment of the site must:
- Provide at least the amount of employment floorspace (E(g), B class) currently on the site or provide at least 50% of the development as employment floorspace, whichever is greater; and
 - Retain the existing theatre use or provide an alternative cultural use (D2); and
 - Provide active frontages including ground floor retail, community or leisure uses (as defined in the glossary) on Newington Causeway.
 -
- Redevelopment of the site should:
- Provide new homes (C3).
- Redevelopment of the site may:
- Provide a new community health hub (E(e)).
32. The indicative residential capacity across the site allocation is 93 homes. The site allocation also states that comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape.



Map: Site allocation NSP46 map

33. It is important to note that planning permission was granted on appeal for the adjoining site Avonmouth House (No. 6 Avonmouth Street) on 24th January 2023. This site falls within the same site allocation. The appeal was made against a failure to give notice within the prescribed period of a decision on an application for planning permission (ref 21/AP/4297). The consented development is for the demolition of existing building and structures and erection of a part 2, part 7, part 14, part 16 storey plus basement mixed-use development comprising 1733sqm (GIA) of space for Class E employment use and/or community health hub and/or Class F1(a) education use and 233 purpose-built student residential rooms with associated amenity space and public realm works, car and cycle parking, and ancillary infrastructure.
34. Following a section 73 application for the above (ref 23/AP/0958), the scheme had increased in height slightly to account for the new fire safety regulations. It meant that the number of student homes had been reduced to 219 rooms.

Details of proposal

35. The application scheme involves the demolition of the existing 4 storey building and erection of a part 3, part 19 storey building plus basement, comprising commercial floorspace (Class E), 243 purpose-built student accommodation (PBSA) bedrooms and amenity space (Sui Generis class), refuse and cycle stores, internal and external plant, and external landscaping and public realm.

36. PBSA accommodation

The proposal is for direct-let PBSA. The student rooms are arranged as one 10 bed cluster and one 5 bed cluster per floor (except for the third floor which is a 4 bed cluster), with a large, shared living/kitchen/diner (LKD). The 17th and 18th floors change from the standard floor plan to self-contained studio flats. A total of 13 wheelchair adaptable studio units is proposed, which equates to 5% of the total number of units proposed in accordance with policy.

37. Student facilities and amenity spaces are provided as follows:

- (a) Student entrance lobby at ground floor with reception desk
- (b) Lounge, study areas, a gym and private dining rooms are at ground and first floors. In total, approximately 348 sqm internal community amenity space is provided for the student residents.
- (c) 193 sqm private external amenity space provided by way of a landscaped roof terrace at third floor.

38. The PBSA reception and ancillary spaces are also on the ground floor, accessed via Avonmouth Street. A side secondary entrance is also proposed on Newington Causeway to allow for access up to the PBSA accommodation without having to go through the ancillary spaces at the rear.

39. Commercial use

Flexible Class E floorspace is proposed at basement, ground and first floor, totalling 1,484sqm (GIA), 10% of which would be affordable. The commercial floorspace has a separate entrance from Newington Causeway and a secondary entrance from Avonmouth Street. The design and layout have been developed to maintain as much flexibility as possible to allow a range of different Class E users to take the space, with proposed office/workspace shown on the plans as a potential option that could be delivered. The commercial space on the ground floor fronting Newington Causeway has the potential to accommodate a café, which would activate the frontage. The cycle storage for the commercial use is located within the basement. The cycle storage for the PBSA is located on the first floor level. Separate refuse stores are located on the ground floor.



Plan: Proposed Ground floor plan

40. The building is 19 storeys - 61.875m Above Ordnance Datum (AOD) facing Newington Causeway at its highest and stepping down at the 18th floor to 58.275m AOD. It then steps down to 3 storeys to the rear where the main entrance to the PBSA is located on Avonmouth Street.

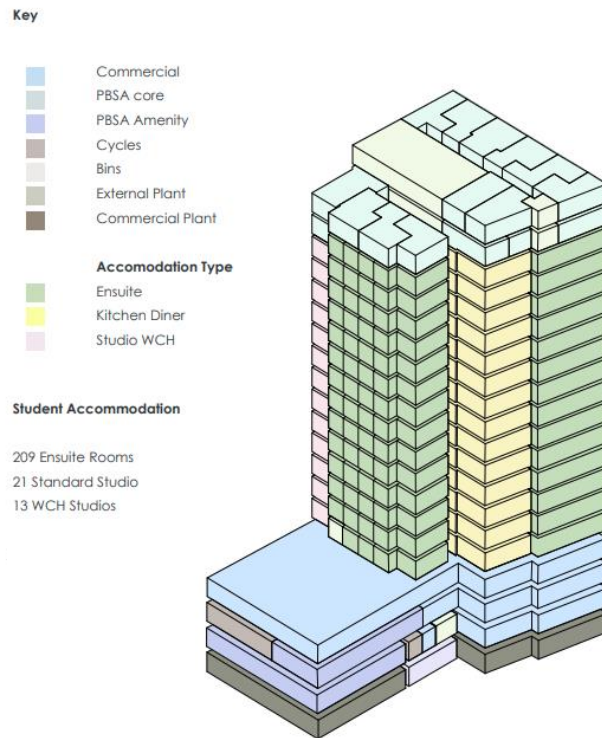


Image: Uses and accommodation type and massing



Plan: Typical floor plan of upper floors



Plan: Typical floor plan of studio flats

41. Landscaping works

The entrance to the PBSA off Avonmouth Street would be through the landscaped public realm. There would be greening along Avonmouth Street. There is a dedicated pedestrian walkway against the flank of 2 Avonmouth Street which is distinct from the shared surface of the main hard landscaped area, which is primarily to be used for refuse bins staging area and access, turning for vehicles. The pedestrian walkway would be landscaped with seating.



- 1 Tree planting to Avonmouth Street with tree cells
- 2 New shrub & perennial planting and seating to student entrance
- 3 Service court with space for two commercial vehicles
- 4 Retained crossover off Avonmouth Street
- 5 Visitor cycle parking
- 6 Refuse store access
- 7 Secondary access and escape
- 8 Blue badge parking space
- 9 Main student entrance & access to reception, lounge, and study rooms

Plan: Landscaped entrance and vehicle servicing area



Plan: Third floor communal terrace

42. Deliveries and servicing for the development would be accommodated on site, including refuse collection, which would be via a private management company. One blue badge car parking space is provided on site, in the shared courtyard with Avonmouth House. This will be shared between the two sites, and utilised when allocated to a student / staff member with a blue badge.

Planning history of the application site and nearby sites

43. 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. There is some planning history on the site, but none that are relevant to this application.
44. It is worth noting the planning history on the adjoining site at Avonmouth House and Borough Triangle opposite the site.

Planning permission was at Avonmouth House granted on appeal: 21/AP/4297 – dated 24/01/2023 for Demolition of existing building and structures and erection of a part 2, part 7, part 14, and part 16 storey plus basement development comprising 1,733sqm (GIA) of space for Class E employment use and/or community health hub and/or Class F1(a) education use and 233 purpose-built student residential rooms with associated amenity space and public realm works, car and cycle parking, and ancillary infrastructure.

23/AP/0527- dated 30/06/2023 and agreed for Non material amendment to permission granted on appeal ref. no. 21/AP/4297 dated 24/01/2023 for 'Demolition of existing building and structures and erection of a part 2, part 7, part 14, part 16 storey plus basement mixed-use development comprising 1733sqm (GIA) of space for Class E employment use and/or community health hub and/or Class F1(a) education use and 233 purpose-built student residential rooms with associated amenity space and public realm works, car and cycle parking, and ancillary infrastructure'. The amendment seeks to remove reference to the number of PBSA rooms in the description of development.

23/AP/0958 - dated 25/07/2023 and granted for Variation of Conditions 2, 27 and 32 of Appeal decision ref. APP/A5840/W/22/3303205 (planning application ref: 21/AP/4297) (Demolition of existing building and structures and erection of a part 2, part 7, part 14, and part 16 storey plus basement development comprising 1,733sqm (GIA) of space for Class E employment use and/or community health hub and/or Class F1(a) education use and purpose-built student residential rooms with associated amenity space and public realm works, car and cycle parking, and ancillary infrastructure). Minor material amendment sought: Amendment to approved plans and rewording of conditions.

Planning permission was granted for Borough Triangle (Land And Site At 18-54 Newington Causeway 69 Borough Road 82-83 Borough Road)

24/AP/1958 – dated 17/06/2025 for Phased mixed-use redevelopment of the site comprising:

Demolition of all existing buildings/structures and site clearance, except 82 and (part) 83 Borough Road which are to be retained, altered and refurbished for Flexible Commercial, Business and Service, and Learning and Non-Residential Institution Uses (Class E/F1 / F2(b));

- Construction of basement structure and vehicular access;

- Construction of buildings to provide Dwellings (Class C3), Flexible Commercial, Business and Service and mixed food and drink and leisure uses (including drinking establishments with expanded food provision, hot food takeaways, live music performance venue and cinema) (Class E / Sui Generis) and public toilets; and

- Provision of associated car and cycle parking, open space and landscaping, means of access and highway alterations, installation of plant and utilities and all other associated ancillary works incidental to the development.

Pre-application engagement and mid-application amendments

Pre-application engagement

45. This application was submitted following a detailed pre-application enquiry, the reference number for which is 24/EQ/0142. Further details on engagement are set out in the Community involvement and engagement section of this report.
46. The applicant initially proposed a scheme that was 24 storeys in height at the

pre-application stage. Further to negotiations with Officers, the scheme has been refined with the height of the building reduced. Furthermore, previous iterations of the scheme included full re-provision of the existing commercial floorspace, which included two levels of basement. Whilst the full re-provision of the commercial floorspace was welcomed by Officers, the Design and Review Panel had expressed their concern over the four floors of commercial space as they felt it detracted from the quality and efficiency of the space. They also considered that the double basement commercial floorspace would not be adequately lit from the proposed lightwells, and that the requirement to re-provide the existing floorspace made the cycle storage within the double basement less attractive and functional. As such, the proposed scheme now only includes one level of basement and a reduced commercial provision. This is discussed in the assessment section of this report.

Mid-application amendments

47. 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.
48. The following amendments have been made:
 - Improvements to the cycle store to meet fire safety regulations.
 - Removal of the window on the southwest flank elevation
 - Introduction of the bin staging area in the servicing area
 - Minor amendments to two studio rooms
49. The above minor amendments were not considered to be significant to necessitate a new round of public consultation.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

50. 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;
 - Affordable workspace
 - Environmental impact assessment
 - Affordable housing and development viability
 - Quality of residential accommodation – PBSA
 - Design, including layout, building heights, landscaping
 - Heritage considerations
 - Archaeology
 - Impact of proposed development on amenity of adjoining occupiers and surrounding area, including privacy, daylight and sunlight
 - Transport and highways, including servicing, car parking and cycle parking

- Environmental matters, including construction management, flooding and air quality
- Energy and sustainability, including carbon emission reduction
- Ecology and biodiversity
- Socio-economic impacts
- Planning obligations (S.106 undertaking or agreement)
- Mayoral and borough community infrastructure levy (CIL)
- Community engagement;
- Consultation responses; and
- Community impacts, equalities and human rights.

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

Legal Context

52. 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. 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.
53. 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

54. 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

Environmental impact assessment

55. Environmental Impact Assessment (EIA) is a process reserved for the types of development that by virtue of their scale or nature have the potential to generate significant environmental effects.
56. The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 set out the circumstances in which development must be underpinned by an EIA. Schedule 1 of the Regulations sets out a range of

development, predominantly involving industrial operations, for which an EIA is mandatory. Schedule 2 lists a range of development types for which an EIA might be required due to the potential for significant environmental impacts to arise. Schedule 3 sets out that the significance of any impact should include consideration of the characteristics of the development, the environmental sensitivity of the location and the nature of the development.

57. This application would be considered an 'Urban Development Project', but the site area does not exceed 5 hectares. Whilst there would be 243 habitable rooms, using London Plan ratio of 2.5:1, this would be fewer than 150 dwellings, which is the threshold at which might trigger the requirement for an EIA. The development is not likely to have significant effects upon the environment. The matters to be considered can be adequately assessed through the submission of technical reports alongside the planning application, and therefore an EIA is not necessary. Those impacts which are identified through the various submitted reports and studies can be mitigated through appropriate conditions or obligations.

Principle of the proposed development in terms of land use

Relevant policy designations

Overarching strategic policy objectives

58. 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.
59. In the economy chapter of the London Plan, policy E1 supports new office provision, refurbishments and mixed-use development. Policy E3 sets out the affordable workspace policy. The policies within the housing chapter of the London Plan seek to optimise the potential for housing delivery on all suitable and available brownfield sites, with a strategic target of 50% of new homes to be genuinely affordable. The London Plan also states that boroughs, student accommodation providers and higher education providers are encouraged to develop student accommodation in locations well-connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment schemes.
60. 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.
61. The Southwark Plan in its strategic vision, ST1 “Southwark’s development targets” aims to achieve targets for 40,035 homes and 58,000 new jobs in the borough between 2019 and 2036, at least 460,000sqm of office floorspace between 2019 and 2036, 90,000sqm of additional employment floorspace outside the CAZ, and targets 76,670sqm net new retail floorspace. These targets feed into the policies SP1 “Homes for all” and SP4 “A green and inclusive economy,” and the area visions.
 62. The Southwark Plan’s area vision AV.09 for Elephant and Castle states development should support the area’s function as a major town centre and as a central London location that attracts global business, research, teaching, shopping, flexible business spaces and cultural activities. It should also provide as many homes as possible at a range of different tenures including social housing. It notes that developments should provide opportunities for existing small businesses, particularly those from minority ethnic groups, to relocate and continue trading.
 63. Southwark Plan policy P30 “Office and business development” requires such proposals within the site allocations to retain or increase the amount of employment floorspace on the site, promotes the successful integration of homes and employment space and requires a marketing strategy for the proposed use to demonstrate how it will meet current market demand. It also states that conditions will be used to restrict changes of use within Class E.
 64. In addition to the development management policies in both plans, site allocation NSP46 within the Southwark Plan is specific to the current application site. The site allocation sets out requirements for the redevelopment of the site to include employment floorspace currently on site, new homes (indicative capacity of 93 homes), retaining the existing theatre use and provide active frontages (retail, community or leisure uses) on Newington Causeway. The site allocation also notes that redevelopment of the site may provide a new community health hub. The proposed development would not cover the whole area allocated under policy NSP46, which is Avonmouth House and 63-85 Newington Causeway.
 65. The indicative homes capacity target of 93 is almost met by the approved development at Avonmouth House for 216 PBSA rooms, which converts to 86.4 homes using the GLA metric.
 66. 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.

67. 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.
68. 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.
69. Southwark Plan Policy P27 Education Places says that development for higher and further education facilities will be permitted where they meet identified needs.
70. Southwark is home to Kings College London, the University of the Arts and London South Bank University, some of the largest universities in London. Benefiting from the excellent public transport accessibility levels and good links to the aforementioned higher education institutions, the application site being within a Town Centre makes it appropriate for education-related uses.
71. The application was accompanied by a Student Needs Assessment, which consider the need for PBSA within both the borough and Elephant and Castle. It specifically considered a catchment area of a 30 minute public transport travel time from the site. It notes that over the longer term, student population growth remains likely and forecasts a need for an additional 10,500 bedspaces arising from the above-mentioned universities in the catchment area. The evidence also points to a pipeline of around 1,000 bedspaces on sites with planning permission across Southwark of which around 900 are within the Elephant & Castle area. Since the submission of this application, a further 1,434 beds were recently approved by the Planning Committee for Skipton House. Nevertheless, at a local level the pipeline is still not sufficient, and the submitted Needs Assessment argues that there is a need for additional PBSA.
72. Uniquely in London Southwark Plan PBSA policy prioritises on site affordable housing and consequently these schemes would also deliver 1,000 affordable homes and circa £100m PIL.
73. 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's vision to support the area's function as a major town centre and the existing universities.

74. It would also form an integrated part of a mixed-use redevelopment. The principle of higher educational uses in the form of student housing is already established within the site allocation by virtue of the permission granted by the Inspector for Avonmouth House. Therefore, in principle the proposed student housing land use aligns with the requirements of London Plan Policy S3 as well as Southwark Plan Policy P27, providing that it contributes to the creation of a mixed and inclusive neighbourhood.
75. As noted earlier, NSP46 indicates a capacity of 93 homes. Whilst this is nearing capacity via the planning permission at the adjoining site Avonmouth House and this is now being built, there is support for student accommodation in this well-connected location. The sub-text under London Plan Policy H15 states that new flats, houses or bedrooms in PBSA all contribute to meeting London's housing need. The completion of new PBSA therefore contributes to meeting London's overall housing need and is not in addition to this need. By delivering 243 PBSA bedspaces, which would be equivalent to 97 homes based on the conversion fact of 2:5:1 would contribute to realising the housing aspirations for the Opportunity Area, in line with London Plan Policy SD1 contributing to Southwark's housing delivery target, while also increasing London's housing supply, in accordance London Plan Policy H1. The provision of student housing is also subject to the provision of affordable housing, in this case as a payment in lieu which is discussed under the affordable housing and viability section of this report.
76. A number of comments received from members of the public that the area is saturated with student accommodation. It is also acknowledged that there are other nearby student schemes and in particular the adjoining Avonmouth House development and the recently consented Skipton House. The scheme does include other non-residential uses including flexible Class E commercial floorspace in a well-connected inner London location. The immediate existing area surrounding the application site is characterised by a mix of other uses, including residential, commercial, educational, cultural and leisure uses. Due to the relatively small footprint and size of the site, which does not easily lend to a separate block for conventional affordable C3 housing, a PIL is sought, which is discussed later in this report.
77. Having regard to all the above, the provision of residential floorspace, in form of PBSA with a PIL in respect of affordable housing is acceptable in principle as it would bring into productive use this underutilised inner London site, generating growth. 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.

Non-residential (commercial/employment/business) uses.

78. Relevant policies for a Class E employment space proposal include London Plan policies E1 and E2, and Southwark Plan policy P30, as well as area vision AV.09 and site allocation NSP46.

79. The first section of Policy P30 of the Southwark Plan 'Office and Business Development' states that:
"In the Central Activities Zone, town centres, opportunity areas and individual development plots within site allocations where employment re-provision is required, development must:
 1. *Retain or increase the amount of employment floorspace on site (Gross Internal Area (GIA) of E(g), B2, B8 class use or sui generis employment generating uses)".*
80. The site allocation also requires that any development provide at least the amount of employment-generating floorspace (Class E(g), B class), currently on the site or provide at least 50% of the development as employment floorspace, whichever is greater. The existing uses within the whole site allocation comprises the following:
- Southwark Playhouse (Sui Generis) – 816sqm
 - Office (E)(g)(i)) – 4,168sqm
 - Light industrial uses (B1c) – 827sqm
 - Job Centre (E(c)(i)) – 546sqm
81. The existing commercial uses at the site itself comprise a job centre and separate office currently tenanted by the software company, BlueOptima. The total floorspace of the existing building is 2,108sqm (including the basement ancillary facilities). The DWP job centre is located on the ground, first and second floors and the floor area with the ground floor being classed as (E(c)(i)) and has a floor area of 501sqm. The first and second floors being the offices for the job centre is Class (E)(g)(i). The basement consists of a storeroom, toilets and ancillary facilities.

Level	Existing GIA (sqm)	Proposed GIA (sqm)
Basement	102	414
Ground	501.5	221
First	501.5	263
Second	501.5	586
Third	501.5	
Total commercial including ancillary facilities	2,108	1,484
Total Class E(g)	1,606.5	1,484
Total Class E(c)	501.5	

Table: Existing and Proposed uses

82. BlueOptima occupies the third floor and is an office. The existing aggregate amount of Class E(g) office on the site is therefore 1,505sqm. By including the basement facilities, the total would be 1,607sqm. It is likely that the development would be occupied by offices and the Newington Causeway being

activated by a café linked to the office space. Whilst the Class E maintains future flexibility to respond to market demand, it is envisaged that the majority of the commercial spaces would likely be occupied by office tenants. It is considered necessary to impose a condition limiting the use to fall within Class E(g)(i) subclass, with the ancillary café associated with the office space allowed fronting Newington Causeway.

83. There is an overall shortfall of reprovision of commercial floorspace. The site allocation specifically refers to the reprovision of the employment generating office use (E(g)(i) and not the Professional Services use (E(c)). The proposed 1,484sqm is below the existing 1,607sqm of office floorspace.
84. As previously mentioned, the site allocation stipulates that development must provide at least the amount of employment floorspace (E(g), B class) currently on the site or provide at least 50% of the development as employment floorspace, whichever is greater. It should be noted that the existing office uses stated in the site allocation (4,168sqm) is the aggregate amount of office floorspace across all other sites. In this case, the latter requirement is greater and therefore, the site allocation collectively should provide a minimum of 2497.5 sqm of employment floorspace onsite (Class Eg and B). The Avonmouth House development would provide just over 1,700sqm of Class E/F1 floorspace. The cumulative employment floorspace of both schemes would therefore exceed the above.
85. As mentioned above, previous iterations of the scheme at pre-application stage included full reprovision of the existing commercial floorspace by including a double basement. During the design review by the Design review Panel (DRP), concerns were expressed over the four floors of commercial space as they felt it detracted from the quality of the space. Officers also felt that the creation of a double basement to provide more office would significantly contribute to carbon emissions, going against the sustainability policies in the Southwark Plan.
86. The scheme would provide a higher quality commercial floorspace with a more efficient and flexible layout and a lower environmental impact. As such, the scheme does not re-provide the full quantum of commercial floorspace, but in terms of employment generating Class E(g) use, the scheme does deliver office use only marginally below the existing floorspace. It is considered acceptable in this instance.
87. P30 criterion 3) does state that *“Development that results in a loss of employment floorspace anywhere in the borough must provide a financial contribution towards training and jobs for local people.”*

The Section 106 and Community Infrastructure Levy SPD (S106 and CIL SPD adopted in July 2025) states that where development does not re-provide the employment floorspace on site and where this leads to a net loss of employment floorspace on-site, a S106 financial contribution will be required.

88. The existing number of employees at Blue Optima is estimated at 10 and 15 for the job centre (total 25). This results in a financial contribution of £21,706.

89. The job centre has been noted as use Class E(c) on the ground floor within the site allocation (and used as Class E(g) offices above). A job centre provides for a use compatible with the main retail functions within the Elephant Major Town Centre and attract a significant increase in footfall and vitality to the town centre. As set in policy P35 of the Southwark Plan, ground floor active frontages are required where there is a high footfall and to retain floorspace or replace retail floorspace with an alternative use that provides a service to the public and not harm the viability and vitality of the centre. As noted above, the ground floor of the building fronting Newington Causeway could be a café linked to the office and would retain an active frontage, in line with the site allocation requirements.
90. The site is within the Hot food takeaway primary school exclusion zone. The proposed development does not propose any hot food takeaway as the café is associated with the office use.

Job Creation

91. The application is accompanied by an Economic Benefits Note. It calculated that based on the proposed Class E floor space it could generate 93 jobs on site, equivalent to 79 FTE. There would also be 7 jobs associated with the operation of the student accommodation (e.g. administration, security, maintenance etc). This would be an uplift in the number of jobs (estimated to be an around 25 existing) currently on the site.
92. In terms of the s106 obligations, this development would be expected to deliver 19 sustained jobs to unemployed Southwark residents, 19 short courses, and take on 4 construction industry apprentices during the construction phase or meet the Employment and Training Contribution. The maximum Employment and Training Contribution is £90,550 (£81,700 against sustained jobs, £2,850 against short courses, and £6,000 against construction industry apprenticeships).
93. The Local Economy Team (LET) has reviewed the application and has recommended an employment, skills and business support plan should be included in the S106 obligations.
94. LET has also recommended that as there will be 1,000sqm or more of gross new floorspace, the applicant should allow local businesses to tender for the procurement of goods and services generated by the development both during and after construction. In accordance with the S106 and CIL SPD, developers should use reasonable endeavours to procure from businesses and organisations based in Southwark either:
 - 10% of the total value of the construction contracts or,
 - 10% of the total number of construction contracts tendered in relation to the development.

This shall be secured in the s106 agreement.

Business Relocation

95. Policy P33 'Business Relocation' in the Southwark Plan states that *"Where existing small or independent businesses or small shops may be displaced by development a business relocation strategy, written in consultation with affected businesses, must be provided. The business relocation strategy must set out viable relocation options."*
96. The existing tenants in the building are not small or independent businesses so does not in theory require a Business Relocation Strategy (BRS). However, it is noted that the job centre also has a community function and as such, the applicant has offered relocation options to the existing tenants on the site.
97. DWP has been offered alternative accommodation within the same catchment area of equivalent floorspace, and the applicant has specifically offered the commercial space being built at the redeveloped Avonmouth House. The terms offered are similar to that the tenants now have. Nevertheless, despite the applicant's attempts to engage with the existing, there has not been any response or engagement from the tenants.
98. Both tenants are aware of the proposed provision of Class E space within the proposed development, however, there is an estimated 30 month construction programme from demolition to practical completion. There will also be a time lag between the grant of planning permission and commencement of works on site, due to the amount of design work required to gain Gateway 2 Approval under the Building Safety Act. Whilst the policy does not require a business relocation strategy, Officers welcome the applicant's proposals which includes keeping both tenants informed of their development timeline to help them plan a relocation. Both tenants will be offered flexibility to leave the premises early in the event they find alternative accommodation prior to planning permission is granted or construction date is fixed.
99. Whilst the Job centre has a community function, it is not a 'Community use' as defined under Southwark Plan Policy P47 'Community uses'. Officers do consider it to be an important facility and its loss has been considered by the submitted Equalities Impact Assessment (EQIA) and is discussed in the relevant section.

Affordable Workspace

100. Policy P31 'Affordable workspace' includes a requirement for development proposing over 500sqm of employment space to include 10% of the proposed gross new employment floor space as affordable workspace on site. The affordable workspace should be secured for at least 30 years, respond to local demand and prioritise existing businesses. The applicant has confirmed that 10% of the space (148sqm) would be affordable and this would be secured in the S106 agreement.
101. The application proposal does not include a health hub as that may be provided in the allocation. However, an application on site H1 of the former Heygate Estate has been submitted with a Health Hub included which itself has been the

subject of discussions with the NHS. In this instance, whilst this application does not provide a health hub, the site allocation only indicates that:

“Redevelopment of the site may: Provide a new community health hub (E(e)).”

Given that this is not a ‘must’ requirement and noting that a health hub is potentially being proposed at Elephant and Castle in the future, it is considered acceptable not to propose a health facility on this site.

Affordable Housing and Development Viability

102. Development plan policies require student housing schemes to deliver affordable housing. Policy H15 of the London Plan requires the maximum level of student accommodation to be secured as ‘affordable’. Policy P5 of the Southwark Plan states that PBSA development must:
 1. Provide 5% of student rooms as easily adaptable for occupation by wheelchair users; and
 2. When providing direct lets at market rent, 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; or
 3. 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.
103. The policy provides two avenues for applicants to follow, one for schemes that are entirely direct-let and one for schemes that are nominations. The proposal is for direct-let PBSA.
104. While the London Plan’s specific requirement for student housing proposals to deliver affordable rooms is noted, the Council’s priority is for conventional affordable housing due to the pressing need in the borough. Officers consider that although there would be some benefit to providing affordable student housing, this would be significantly outweighed by the benefits arising from general needs affordable housing delivery. Therefore, the latter should be prioritised. In reviewing the viability of the scheme, the surplus has been considered in terms of a financial 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.
105. This application is accompanied by a Financial Viability Assessment (FVA) which was reviewed by independent consultants on behalf of the Council. The initial assessment was supplemented by additional information to address queries raised by the Council’s consultant. This was amended during the

course of the application given that the level of affordable housing was revised upwards since it was submitted in December 2024.

106. Following discussions over the assumptions, the applicant has submitted an updated viability appraisal. The submitted FVA addendum (July 2025) concluded that taking into account other expected planning obligations and CIL, the proposed PIL at is more than the maximum reasonable provision. The s106 and CIL SPD sets out the formula for the expected s106 financial obligation:

The total number of habitable rooms across the development (all tenures and types) × 0.35 (minimum 35% provision) × £ per habitable room in the CIL value area.

The site is within CIL Zone 2 and therefore requires an in lieu payment of £130,000 per habitable room of conventional affordable housing, effectively establishing the minimum payment. However, the policy expectation, as per Southwark Plan Policy P5, is for development proposals to deliver the maximum viable amount. 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 with a PIL towards off-site affordable housing. For the proposed development, a 35% provision equates to 85.05 habitable rooms, resulting in a minimum expected contribution of £11,056,500 as a PIL to the Council to use for providing affordable housing in the borough.

107. The applicant's FVA adopts all the council's consultant's inputs except for OPEX (Operation Expenditure) and Profit Target. This appraisal maintains the applicant's original OPEX allowance (£4,400 per bed) but a revised PBSA profit target of 15% on GDV. This results in an increased contribution of £7,900,000. This is the maximum reasonable provision. Despite this, the applicant has made an offer of £11,056,500. This offer is not supported by a viability appraisal from the applicant.
108. The council's own consultant advised that PBSA profit targets have typically been agreed between 12.5% and 15% on recent applications in the Borough and therefore the Applicant's revised position falls within the range and therefore could be considered acceptable in this context.
109. The applicant's OPEX differs to the council's own (applicant at £4,400 per bed against the council's view of £3,500 per bed). Given that there will be review mechanisms in the s106, the actual OPEX will need to be evidenced. The council's consultants have advised that the scheme is subject to open book review mechanisms and that our benchmark land value, finance rate and target profit inputs are fixed for the purpose of these reviews.
110. Whilst the applicant's appraisal shows that the maximum reasonable offer is £7.9m, in order to progress the negotiations and conclude matters, the applicant improved their PIL offer to the minimum of £11.05m.

111. The affordable housing PIL will be index-linked as this mechanism offsets the depreciation that would otherwise occur due to inflation. The instalment programme will be as follows:

- 25% of the payment-in-lieu prior to implementation;
- 50% of the payment-in-lieu prior to practical completion; and
- 25% of the payment-in-lieu prior to occupation.

The s106 agreement will secure an Early Stage Review in the event of implementation being delayed for more than 36 months (given the delay with the approval of Building Safety Act Gateway 2 applications).

Conclusion on affordable housing and development viability

112. The PIL of £11.05 million offered by the applicant is substantial and would contribute to delivering affordable housing through its Council Homes Building Programme. The acceptability of the offered PIL is based on the specific merits of this proposal, taking account of all the material considerations highlighted above. It is considered that the Council Homes Building Programme is a more effective way to provide conventional affordable housing under current economic climate, to the extent that any departure from the on-site preference of the NPPF, London and Southwark Plan is justified (for the above reasons based on the specific merits of this student housing proposal). The PIL would be required to be paid 25% on implementation of the scheme, 50% on completion of the scheme and 25% 6 months post first occupation of the scheme.

Quality of residential accommodation

Policy background

113. 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.

114. Criterion 5 of London Plan Policy H15(A) requires the PBSA accommodation to be adequate and functional in terms of its living space and layout. 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:

- Criterion 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.

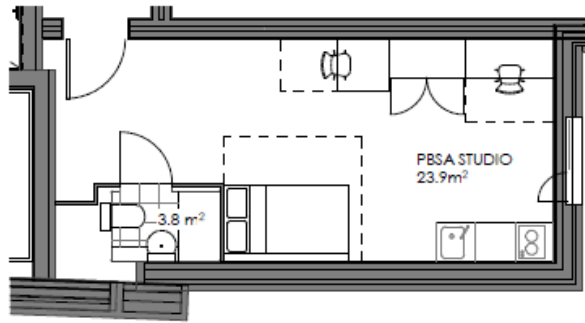
115. The PBSA will provide 209 ensuite rooms, 21 studios each with private kitchenette facilities and 13 wheelchair studios. Internally the clustered arrangement of student rooms and studios is repeated on every floor. On each floor a shared dining/common (LKD) space is located immediately adjacent to the core and equidistant from the two ranges of room and studios. This space is generous benefitting from wide north-facing windows and views. A range of room and studio sizes would be provided as follows:

Ensuite rooms from 13.5sqm to 17.6sqm

Studios from 18.5sqm to 23.9sqm



Plan: Typical layout Cluster flats

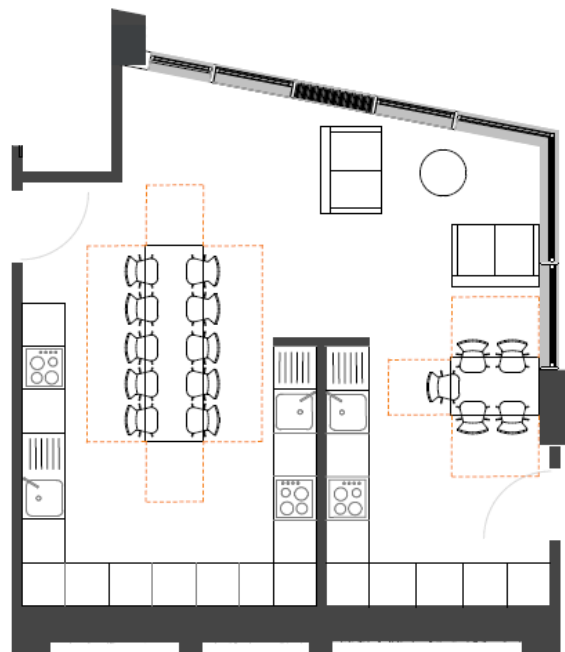


Standard Studio Type 14 - L16

Plan: Example of studio

116. The Southwark Plan does not prescribe any minimum space standards with respect to student accommodation. It is considered that the range of sizes would be adequate for satisfactory level of accommodation. The occupiers would share an open-plan communal LKD space, which is 48sqm. This would be shared by 15-16 occupiers, which is considered sufficient. 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.

CLUSTER KITCHEN



A Cluster Kitchen Floor Plan

Plan: Cluster kitchen

117. The student entrance lobby at ground floor with reception desk would be manned on a 24/7 basis. Other facilities include a lounge, study areas, a gym and private dining rooms at ground and first floors and is just over 340sqm internally. Furthermore, the 193sqm external communal garden on the third floor is considered sufficient. The proposal is consistent with other recently approved PBSA schemes in the borough.

Internal daylight

118. In new buildings, the BRE 2022 guidelines recommend calculating ‘illuminance’ to determine whether a dwelling will appear reasonably daylight. This assessment uses Spatial Daylight Autonomy to demonstrate illuminance targets. The UK National Annex gives illuminance recommendations of:
- 100 lux in bedrooms;
 - 150 lux in living rooms; and
 - 200 lux in kitchens.
119. These are the median illuminances, to be exceeded over at least 50% of the assessment points in the room for at least half of the daylight hours. Where a room has a shared use, the highest target should apply (for example studio flats with shared living room and bedroom). However, for L/K/D where the kitchen is not a self-contained habitable room it is common practice for the lower lux value to be used (150 lux). Other developments in Southwark have been assessed on the basis of 150 lux for L/K/D spaces.
120. In terms of sunlight, the new BRE guidance states *“In general, a dwelling or nondomestic building which has a particular requirement for sunlight, will appear reasonably sunlit provided that:*
- *at least one main window faces within 90 degrees of due south, and*
 - *a habitable room, preferably a main living room, can receive a total of at least 1.5 hours of sunlight on 21 March”.*
121. In terms of overshadowing of amenity spaces, the BRE guidance states *“It is recommended that for it to appear adequately sunlit throughout the year, at least half of a garden or amenity area should receive at least two hours of sunlight on 21 March. If as a result of new development an existing garden or amenity area does not meet the above, and the area that can receive two hours of sun on 21 March is less than 0.80 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 21 March.”*
122. All student rooms, including the communal kitchen areas, on levels 03 to 16 have been assessed. This is a total of 237 rooms assessed. The table below summarises the results.

Room Type	No. of rooms assessed	Achieves Target Daylight Illuminance
-----------	-----------------------	--------------------------------------

		No. of rooms	Percentage
Bedroom	209	201	96.2%
Studio	14	13	92.9%
LKD	14	14	100%
Total	237	228	96.2

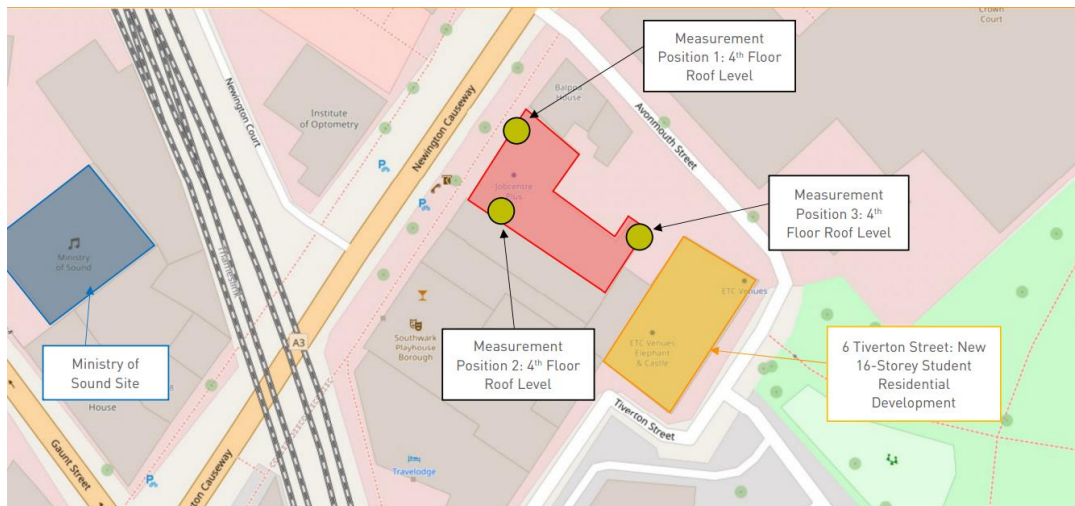
Table: Number of rooms assessed and those achieving daylight target

123. Of the total 237 rooms assessed, 228 (96.2%) will achieve their respective target illuminance over at least 50% of their room area, with the majority of these achieving significantly more than the guideline target levels. The rooms on the 17th and 18th floors have not been tested given that the rooms on the 16th floor meets the target levels. The rooms that are most affected are those on the third floor facing the rear (south east). The lowest level is 40 lux to one studio on the third floor level. The other rooms that fall below the standards would achieve 75 lux and above. Whilst these fall below the BRE guidance, it is noted that the communal areas will all exceed the target daylight illuminance. The high level of compliance in this dense London location is considered acceptable. The applicant has attempted to balance the different design requirements within a dense environment.
124. All the communal living/kitchen/dining rooms assessed achieve median DI values of comfortably more than 200 lux.
125. The submitted assessment shows that 157 (66.2%) of the 237 rooms assessed will achieve the BRE target levels of sunlight in the existing site context. This is a result of many of the rooms having a north-westerly aspect. All the LKDs and studios would meet the sunlight levels.
126. Cumulative assessment
The applicant has also carried an assessment considering the position with the Borough Triangle development built. The effects of the Avonmouth House development have already been included in the first assessment.
127. The assessment shows that the Borough Triangle scheme will have little effect on daylight levels to the south-east facing rooms within the proposed development. The communal LKDs proposed within the scheme would also not be majorly affected. Nevertheless, the Borough Triangle scheme will reduce daylight levels to the north-west facing rooms that look out across Newington Causeway.
128. Of the 237 rooms assessed 179 (75.5%) will achieve their respective target illuminance with the Borough Triangle scheme built. It is mainly the bedrooms on the north-western elevation that fall below the BRE target, with the lowest being only 29 lux at third floor and 40 lux at fourth floor. This is considered a very low value, but this is an impact of Borough Triangle being built – a scheme that is within a site allocation, with tall buildings expected and a package of regeneration benefits being delivered. It should be noted that all the communal LKDs rooms assessed will still achieve median DI values of comfortably more than 200 lux in the cumulative scenario.

129. In regard to sunlight in the cumulative site context the levels of sunlight will reduce slightly, with 155 (65.4%) of rooms achieving the target levels. This is still considered low, but it should be noted that this is a very dense urban location and the LKDs would have good levels of sunlight.
130. In terms of sunlight amenity to the proposed roof terrace, the assessment shows that 91% of the area of the proposed terrace will be able to receive at least 2 hours of sunlight on 21 March. This is comfortably in excess of the guideline 50%, and therefore the space will receive very good sunlight amenity throughout the year.

Environmental comfort

131. The Noise Impact Assessment submitted with the application outlines how, through a suitably designed façade and ventilation strategy, the building façade would ensure appropriate internal noise conditions are achieved. To determine the existing noise climate around the site, measurements were undertaken at 3 locations (Facing Newington Causeway, West of roof closest to the railway and rear of site). These were taken over a 4 day weekend period in September 2024 and were unattended.
132. The Ministry of Sound (MoS) nightclub is located approximately 80m west of the site, separated by both Newington Causeway and the elevated railway viaduct. As a result of the proximity of the proposed development site to MoS, Officers had requested a specific assessment of noise breakout from these premises affecting the future residential occupants.
133. The assessment concluded that acceptable internal noise levels can be achieved through the adoption of acoustically enhanced double glazing and on the facades worst affected by noise (from traffic, rail and entertainment sources), and more standard double glazing on facades subject to lower noise levels. The Council's Environmental Protection Team (EPT) raised no objections and have recommended conditions including internal noise levels, vertical sound transmission between commercial and residential properties, plant noise limits and external noise levels in the communal amenity area. This will ensure that the occupiers of the dwellings do not experience excess noise.



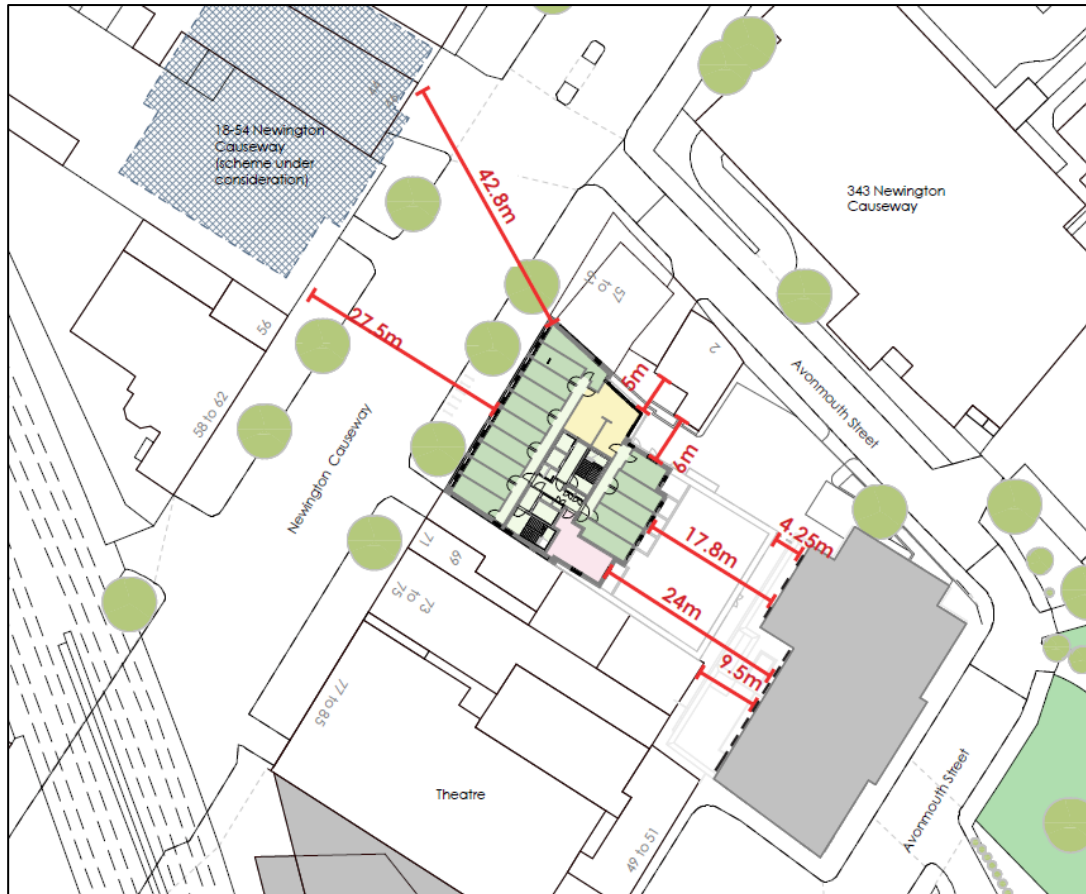
Map: Detailing noise measurement locations

Aspect, outlook and sense of openness

134. 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.
135. It is noted that majority of the bedrooms of the cluster flats and studios would be single-aspect, but that is due to the relatively small footprint of the site area and its constraints. All of the LKDs would be dual aspect, however. Given that the Opportunity Area location and to optimise density through a design-led approach, the outlook and sense of openness for all PBSA occupiers would be acceptable on balance.

Privacy

136. 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.



Plan: Separation distances

137. As shown in the plan above, the student rooms facing Newington Causeway would meet the minimum 12m distance. The windows to the rear facing Avonmouth House at its minimum would be 17.8m, which is below the 21m guideline. The Avonmouth House development is a student building being built by the applicant for this scheme and the distance is acceptable considering the connection between the two blocks and their residents.
138. The above plan also indicates that the distances from the northern elevation and No. 2 Avonmouth Street would be 5m to 6m. However, these proposed LKDs and student rooms would be on the upper levels above the windows at No. 2 Avonmouth Street. Furthermore, the proposed LKDs at the third and fourth floors would be controlled by raising the ribbed panelling on the lower part of the window so there is no direct overlooking. A condition requiring those windows on the northern elevation facing No. 2 Avonmouth Street to be high level is recommended. As such, the privacy of the occupiers of the existing flats and the occupiers of the proposed student accommodation would be protected.



Section drawing: North West Looking Section with development and Balppa House



Section drawing: Northwest Looking Section with development and No. 2 Avonmouth Street

Wheelchair rooms

139. Southwark Plan Policy P5 requires a minimum of 5% of the PBSA studios to be wheelchair accessible. The Building Regulations make clear that student accommodation is to be treated as hotel/motel accommodation for wheelchair specification purposes. In respect of the 243 bedspaces proposed, 13 would be provided to M4(3) standards.
140. Representing just over 5% of the total number of bedspaces, the wheelchair unit provision would meet the numerical requirements of Southwark Plan Policy

P5. The GLA's PBSA LPG (2024) requires wheelchair accessible room provision at a level of 5%, with a further 5% adaptable. However, this is guidance only and the scheme complies with Southwark's local plan. In locational terms, the units would also meet policy requirements, being provided across various floors. This would help achieve social integration. The wheelchair user accommodation is to be secured through the S106 agreement.

Conclusion on quality of residential accommodation – PBSA

141. 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. For the reasons given above, the proposed PBSA would comply with London Plan Policy H15 and Southwark Plan Policy P15.
142. In terms of management of the student accommodation, a draft student management plan was submitted. It is proposed the residence front of house reception (located off Avonmouth Street) desk be staffed on a 24/7, 365 days a year basis. The secondary entrance on Newington Causeway will be CCTV monitored only. The plan confirms that the use of communal spaces will be managed by the on-site management team and there will be a comprehensive CCTV system installed covering these communal areas. Management of the external roof terrace would be that it is only used during daytime hours.
143. There will be a hall management team for the residence and would cover the following areas:
 - Maintenance – accommodation will be clean, safe and secure.
 - External maintenance – for the landscaped area and car parking.
 - Housekeeping and servicing cleaning and refuse
 - Deliveries and collections
 - Checking in and checking out - oversee the arrival and departure of students at the start and end of the academic year.
 - Works to the building – manage the hours of work.
 - Security and safety - on-site management team and will have security coverage on a 24-hour basis through a combination of on-site student wardens, security staff and emergency call centre monitoring.

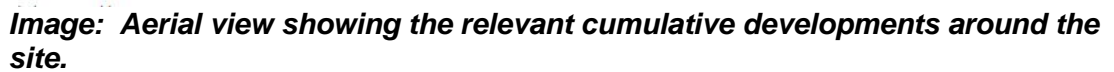
The student management plan also outlines the behaviour that is expected of the occupants and to comply with the terms of the occupational Licence. It is considered that the draft student management plan is adequate, and a more detailed management plan is secured post-permission via a s106 obligation.

Design

144. Paragraph 131 of the NPPF stresses the importance of good design, considering it to be a key aspect of sustainable development. Chapter 12 of the NPPF "Achieving Well Designed Places" is the key national policy for design. 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. London Plan 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.

145. 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, exceed the 30 metre threshold. It thus engages Policy D9.
146. 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.
147. Much of the site context had already been given at the start of this report. The site is not within a conservation area and does not contain any statutory listed buildings. However, there are conservation areas within the vicinity and there are Grade II listed buildings nearby. The existing building on the site is not of any architectural merit. When viewed from Newington Causeway, it does not contribute to the streetscape.
148. There are existing tall buildings within the vicinity of the site. There is the 44 storey residential tower on Newington Butts, which was completed in 2018 and is now known as Highpoint. To the south is One the Elephant, a 37 storey residential tower and the replacement leisure centre. Further to the southwest is the 41 storey redevelopment of Eileen House, now known as Two Fifty One (251 Southwark Bridge Road). On the same side of the site on Newington Causeway are two buildings located to either side of the viaduct, the Kite and the Pioneer Building, which are tall buildings. There is also Elephant Park further south, with the majority of the plots now complete and occupied. The Elephant and Castle Shopping Centre, which includes tall buildings is also currently being constructed.
149. In terms of the emerging context, there are several developments coming forward very close to the site. The two developments closest to the site that comprises tall buildings are Avonmouth house (to the east and rear) and Borough Triangle (to the northwest and opposite).



- [illegible]

Image: The proposed development with Borough Triangle opposite and Avonmouth House to the rear

151. There are also many low and medium rise buildings in the vicinity including those neighbouring buildings that immediately adjoin the site (ranging 3 to 4 storeys) on Newington Causeway and Avonmouth Street. In many respects the scale shifts within the immediate context are typical of the character of this part of Southwark.
152. The main entrance to the commercial component, which takes up the lower floors of the tower is on the Newington Causeway frontage. At the rear and accessed from Avonmouth Street is the main student entrance and includes the main communal facilities for the future student occupiers. The windows have been grouped into a rhythm of single windows and pairs which allows a generous double opening for the PBSA entrance. The projecting canopy further highlights the entrance. The scheme would create a new active frontage along the full extent of the site's two boundaries. The commercial and PBSA components have been well considered in its layout and clearly defined with routes through the building that have are separated. The entrance to the PBSA is primarily off Avonmouth Street, through the landscaped public realm. There is a dedicated pedestrian walkway against the flank of 2 Avonmouth Street which is distinct from the shared surface of the main hard landscaped area. Given the need for servicing on site and the relatively modest size of the site area, the soft landscaping is limited. The reception and lounge area take up the majority of this ground floor fronting the landscaped and servicing area and provides that active frontage on this part of Avonmouth Street.



Image: Elevation fronting Avonmouth Street showing the PBSA entrance

153. The commercial element of the scheme being located on the ground and first and second levels fronting Newington Causeway would also provide an active frontage. The back-of-house facilities such as cycle store located at the rear of the building is logical. The activation and the café on the ground floor would satisfy the requirement of the site allocation for a town centre use and active frontage. The building line on Newington Causeway line up with the adjoining buildings as existing, providing that strong continuous streetscape.
154. The kitchen diner element on the rear facade has been expressed differently the rest of the block to accentuate the difference in plan form.

Height and Massing

155. The proposal is made up of two parts, a 19 storey tower located on the Newington Causeway frontage and a lower 3 storey rear extension. The application has gone through extensive pre-application and application discussions and amendments have been made, which has led to a reconfigured height strategy. At 19 storeys in height the proposed development is a tall building. As such it would need to be assessed against P17. As highlighted above, Policy P17 sets out the criteria that tall buildings should comply with, which have broadly similar themes as the London Plan. These are considered below.
156. The site is within an area where it is expected to have tall buildings (within CAZ,

Major Town Centre and Opportunity Area). The site allocation notes that *“Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape.”*

157. The key urban and architectural design aspects of Policy 17 Tall buildings include:
- i. Makes a positive contribution to the landscape; and
 - ii. Is located at a point of landmark significance; and
 - iii. Is of the highest architectural standard; and
 - iv. Relates well to its surroundings, particularly at street level.

158. Taking each of these in turn:

i) Makes a positive contribution to the landscape

The main contribution to the public realm is at the northern edge of the site on Avonmouth Street where the new student housing entrance is located. Here the forecourt to the accommodation includes some landscape features introducing some much-needed greening to the edge of Avonmouth Street. This area includes some hardscape for servicing – allowing the new facility to be serviced from within the confines of the site. The landscape is well considered, forms an appropriate setting for the building and a proportionate landscaped space for residents and visitors alike. Further assessment of the landscape is discussed in the report below.

159. **ii) Is located at a point of landmark significance**

The appropriateness of tall buildings in this location was pre-empted by the Elephant & Castle SPD (now rescinded) and the tall buildings study which suggests that tall buildings at the edges of the core area help reinforce the gateways into the centre and provide a focus in views along main roads.

160. **iii) Is of the highest architectural standard**

The proposed development design is not just a simple extrusion of the site. It is carefully composed in three parts arising from its location on Newington Causeway. At its base the tower responds to the established datum of the 4 storey buildings on either side. This part of the building steps forward and is composed in a deep-set almost classical order.

161. Above this datum the tower rises elegantly and is further divided by a larger horizontal order – initially 4-storeys in height then reduced to 3 and later 2 storeys to give it an increased verticality. The deep-set windows and spandrels reinforce this larger order and highlighted with a contrasting brick. This is a detail that extends on all four sides of the building giving it an immediately recognisable 3-dimensionality.

162. Finally, the top of the building makes up the top four floors which combine to give the building its distinctive ‘crown’. In addition to the lighter coloured close-set verticals the parapet edge is pleated to give some added articulation to the ‘crown’ feature. Here the beech-block stop one floor below the top to complete the building and better relate it to the height and composition of the consented Avonmouth House. Once again, the pleated design is used on all four sides of

the tower to ensure that it has an appropriate and recognisable 3-dimensionality.

163. iv) Relates well to its surroundings, particularly at street level

This aspect of the policy relates to the public realm and the appreciation of the proposed buildings in the round. The design is carefully calibrated to respond to its surroundings at street level. On Newington Causeway the prevailing streetscene is extended onto the base of the tower and it reinforces the established building line, making the most of the wide pavement in this location.

On the north side and to the rear of the site the design changes in a subtle manner. The pure square massing of the south face is broken down into three narrow and stepped vertical forms that appear to cluster together informally, bound by the large order. The more intimate scale of Avonmouth Street prompts a lower scale block – just 3 storeys in height and topped with a communal garden – an appropriate lower scaled ‘link’ block to the two towers on either side.

164. One of the criteria set out in the Tall Buildings policy P17 is that developments must provide a new publicly accessible space at or near to the top of the building and communal facilities for users and residents where appropriate. The roof terrace would provide communal facilities for students. As it is a student accommodation building, it is not appropriate to provide publicly accessible space at the top of the buildings.

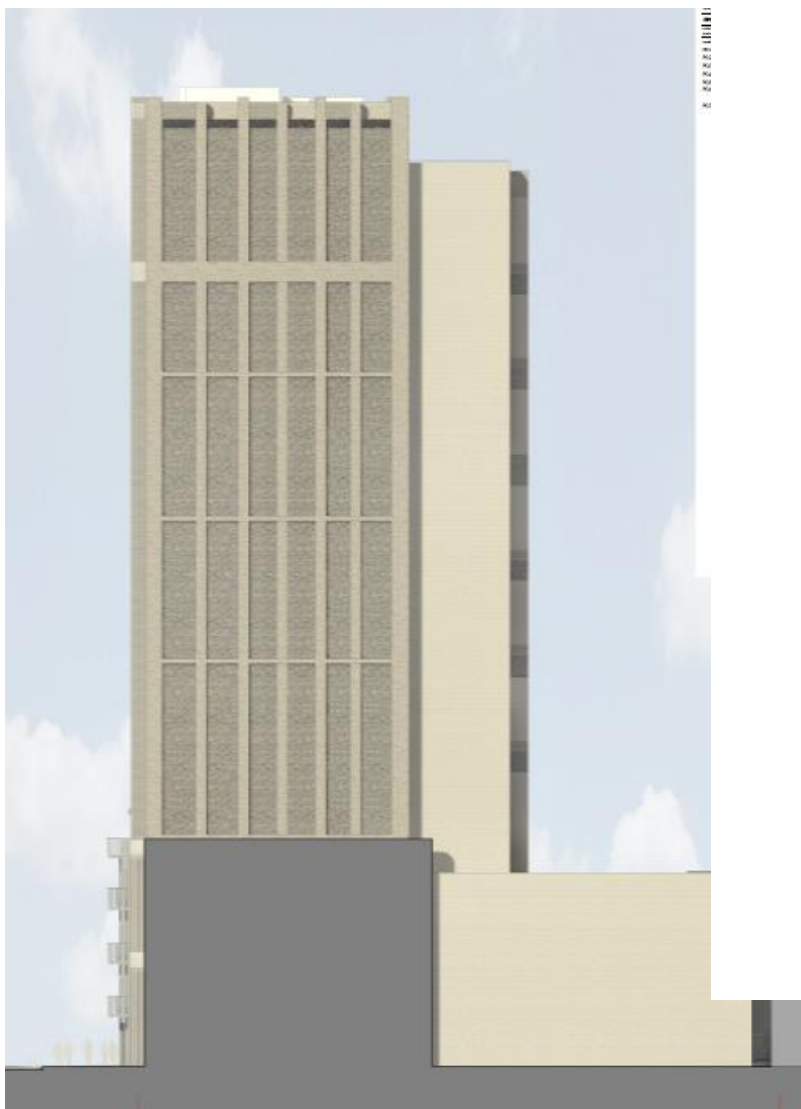
165. In conclusion, the proposal meets the council’s primary urban design policies P13 and P17. In its height and massing the scheme responds appropriately to its immediate and wider setting, changing its height relative to its immediate streetscene. Whilst it is noted that the immediately adjoining buildings are at the lower end of the scale, there is a shift in height of buildings in this part of the Elephant and Castle area and seen notably by the Borough Triangle and Avonmouth House schemes. The tower itself is carefully composed and articulated with a well-defined base, middle and top and a recognisable identity in the round.



Architectural design and materials

166. There is a varied urban character along Newington Causeway. There are also the nearby Grade II listed buildings on Newington Causeway.
167. The front element of the buildings has been designed as one volume with the ribbed buff brick and recessed grey panels giving a texture to this volume. The rear element is set a storey lower and is a much simpler form with simple punched openings on a lighter brick. The front facade has varying layers of detail that set back from the main face of the building dividing this central element into smaller elements. These varying planes and materials provide a further richness to the facade. The base of the elevation would have double bays and allows for generous openings for each of the three different uses. The individual entrances have all been set in from the face of the main facade to provide a more generous approach and this further highlights the entrance locations.
168. Piers on the facade would vary in depth between 112 and 338mm. A further 150mm deep reveal to the window will provide a deep shadow and will emphasise the solid to void ratio and accentuate the verticality of the building. Horizontal banding is added at various floors to split this long element.

169. Within the recessed brickwork a sage-coloured vertical brise soleil feature that provides a contrasting colour also provides shading to the rooms and allow windows to be opened inwards to mitigate any potential overheating adding interest and delight. This green picks up on the colour palate of the recently approved Harper Road development to the north.
170. In addition, the main internal corridors benefit from natural light from the north offering views across the city. The scheme was originally designed with windows to the internal corridors on the south elevation, which would break up the flank elevation adjoining 69-71 Newington Causeway. However, following consultation comments that these windows might limit the future development of adjoining sites, the windows have been removed and would instead follow the same recessed brick and piers as the rest of this elevation.



Elevation: South elevation with piers

171. The proposed design utilises brick as the primary cladding material. Three tones are used to give the mass its articulation and allow the design to respond to its context. A lighter almost stone-like tone is used at the base to reflect the

historic character of Newington Causeway. A slight tonal shift is used in the middle order and distinguishes the main body of the tower from the base. The larger-scaled order clusters floors together and gives the building a strong verticality while the pleated 'crown' reconciles the whole composition.

172. To the rear of the building the choice of bricks and detailing ties in even more closely with the Avonmouth House proposal allowing the buildings to read together as relating elements. The rear volume being formed of the predominately off-white brick makes this volume more recessive and contrasts with the grey brick of the front volume.

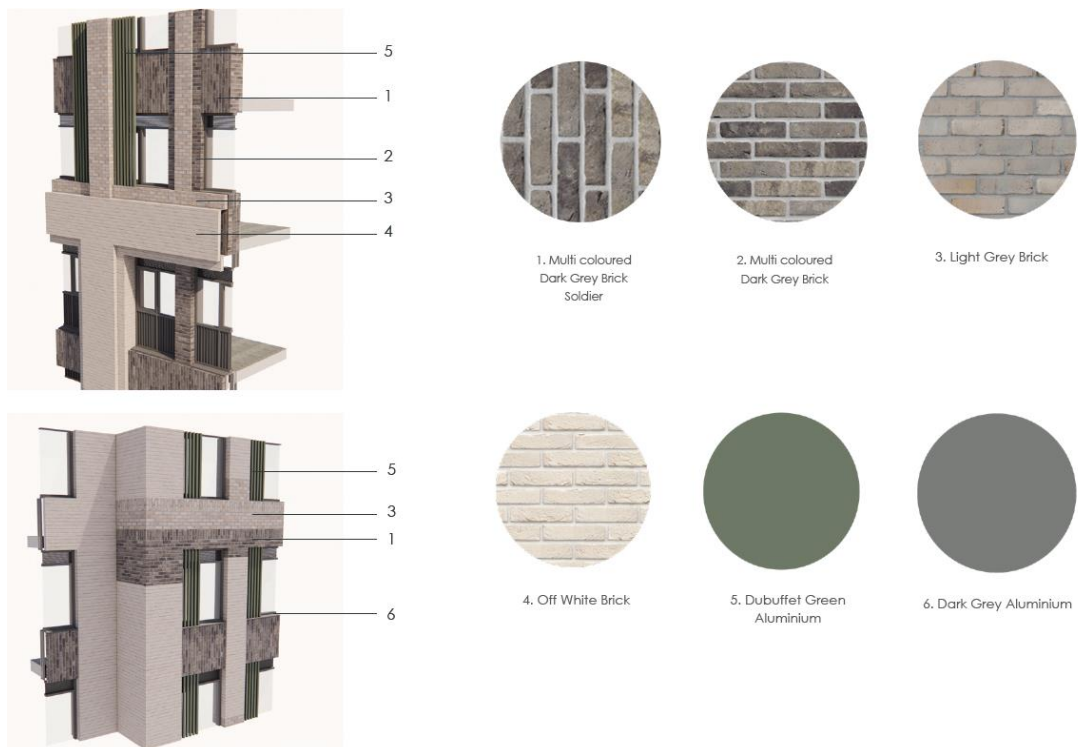


Image: Materials palate



Image: Front Façade – Middle and base



Image: Northwest elevation bay study

173. The overall architectural expression is mannered and distinctive. The use of brick cladding, with a large defining order and a well-composed window design as well as a clearly defined base, middle and 'crown' offer the prospect of a highly articulated and three-dimensional composition that will be experienced in the round.

Conclusion on architectural design

174. The proposal generally conforms with the council's adopted design policies P13, P14 and P17. As a tower of middle order, it is exemplary by design and a fitting addition to the London skyline. It is in an area identified as being suitable for tall buildings and conforms with the local morphology of the cluster – rising to the tallest towers immediately adjacent to the viaduct.
175. In order to secure this design quality, planning condition requiring detailed drawings, material samples and full scale mock ups are recommended. The S106 Agreement would also include a clause requiring the current architect (Alan Camp Architects) to be retained to complete the detailed design and construction phases of the project unless otherwise agreed in writing.

Heritage and Townscape

Impact on the Setting of Listed Buildings, Conservation Areas and Townscape

176. Chapter 16 of the NPPF sets out the national guidance on conserving and enhancing the historic environment. The heritage policies set out in chapter 7 of the London Plan assert that development affecting heritage assets and their settings should conserve their significance by being sympathetic in their form, scale, materials and architectural details. London Plan policy D9 in part C.d) requires tall building proposals to take account of the significance of London's heritage assets and their settings, and part C.e) requires proposals to preserve and not harm the Outstanding Universal Value of a World Heritage Site. In the Southwark Plan, policies P19, P20, P22 and P24 seek to protect listed buildings, conservation areas, borough views and World Heritage Sites. London Plan 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.
177. The council has a statutory duty with regard to heritage. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires local planning authorities to consider the impacts of proposals upon a conservation area and its setting and to pay "special regard to the desirability of preserving or enhancing the character or appearance of that area". Section 66 of the Act also requires the authority to consider the impacts of a development on a listed building or its setting and to have "special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses". In this context "preserving" means doing no harm.
178. The property is not listed, not locally listed and not located in a conservation area. Beyond that the site has a number of designated and undesignated heritage assets, all affected, to a greater and lesser extent, by the scale and massing of the proposed development.
179. Protected views
No London View Management Framework (LVMF) view corridors or Borough local view corridors cross the site. Whilst the site itself is not located within any of the strategic viewing corridors or protected vistas, the GLA's pre-application response was that it is relatively close to Protected Vista 23A.1- Centre of Bridge over the Serpentine to the Palace of Westminster World Heritage Site (WHS), it was suggested that a wire-line view showing its position within the wider skyline panorama be provided. The submitted view shows that the proposed development is completely obscured by intervening built fabric. It causes no harm to the Palace of Westminster WHS.
180. The heritage assets whose settings could be affected include:

Statutory Designated Heritage Assets

- The Grade II* listed:
St George the Martyr
- The Grade II Listed:
Inner London Sessions Court

Nos 1-15 Trinity Church Square
 Nos 16-22 Trinity Church Square
 The Henry Wood Hall, including gate piers and attached railings

- Locally designated Heritage Assets:
 Trinity Church Square Conservation Area
 Borough High Street Conservation Area

181. To consider the impact of a proposal on heritage assets the NPPF requires decision-makers (in para 212) to consider the significance of the heritage asset and the degree of harm. Great weight should be given to the asset's conservation (including its setting) and to determine whether the potential harm is Substantial, total loss, or Less than Substantial.
182. Officers use views of the heritage assets that define their settings to assess this impact. In particular, views that contribute positively to their significance, allowing the viewer to appreciate their architectural or historic significance to the general public. The views submitted with the application (in the Townscape Heritage and Visual Impact Assessment, THVIA) have therefore been scoped and agreed with the council typically in the pre-application stage and always from the public realm.
183. The views that have been provided are as follows:
- View 1: Harper Road, opposite Inner London Sessions Court car park (Render)
 - View 2: Harper Road, at Swan Street (Render)
 - View 3: Harper Road, at Brockham Street (Wireline)
 - View 4: Bath Terrace Green (Render)
 - View 5: 4 Rennie House (Render)
 - View 6: Newington Causeway, at Southwark Bridge Road (Render)
 - View 7: Newington Causeway, at Newington Ct (Render)
 - View 8: 26 Newington Causeway (Render)
 - View 9: Newington Causeway, outside The Ship (Render)
 - View 10: Borough High Street, at Great Suffolk Street (Render)
 - View 11: 58/59 Trinity Church Square (Wireline)
 - View 12: 47 Trinity Church Square (Wireline)
 - View 13: 47 Trinity Street (Wireline)
 - View 14: 219-221 Borough High Street (Render)
184. This report will not list every view that has been assessed but will provide an analysis and comment on those views that are most sensitive, have high heritage and townscape significance or prominence.

Listed Buildings

185. The Inner London Sessions Court

In this case the most immediate impact on the heritage arises due to the proximity and orientation of the Grade II Listed Inner London Sessions Court immediately to the north. When viewed from Harper Road the proposal will be seen across the landscaped forecourt of the Sessions Court rising behind the unlisted 1970s extension along the southern edge of the site.

186. The landscaped court is an important part of the listed courthouse and contributes positively to its setting. The listed courthouse was constructed in 1914-21 and extended in 1954-58. It is in the Neo-Classical tradition clad in stone with a rusticated base, a confident symmetrical composition sweeping roofline. The mature landscape and the curtilage-listed gate and railings reinforce the axial approach and view from Newington Causeway. The inclusion of a second gate on Harper Road underlines its importance of this oblique view to the setting of this important building.
187. In this view the building will rise sharply behind the unlisted extension. Its height has been carefully calibrated to relate well with the recently consented Avonmouth House. The Inspector considered the effect of Avonmouth House on the setting of the listed courthouse when they granted permission to Avonmouth House and commented that: *“Existing tall buildings at the Ceramic Building and Eileen House are partially obscured by deciduous trees. The proposed development would introduce a further tall building which would appear to be of a similar height to the Ceramic Building but would have very different façade treatments from its neighbour. This would assist its visual separation from the Ceramic Building and would not harm the local townscape or alter the strategic importance of the courts.”*
188. The THVIA views submitted with the application demonstrate that the Cobourg House proposal will have a similar impact on the setting of the courthouse only in this case it is located away from the listed building. The views demonstrate that there is a degree of cumulative impact arising from two buildings (Avonmouth House and Cobourg House) in relatively close proximity aligned along the southern edge of the Session Court property.
189. In these views the proposed scheme sits below the ridge line of the ceramic building and 251 Newington Causeway (Eileen House). The clear space between it and Avonmouth House ensures that the impact is measured and not overly harmful.
190. In this case there is a limited amount of Less than Substantial harm arising to the setting of the Grade II Listed Sessions Courthouse. This harm is of a low order of Less than Substantial Harm.
191. This is due to the oblique nature of this view of the courthouse and the clear separation between the proposed development and the courthouse. Notwithstanding this, given the significance of Courthouse being Grade II Listed, the level of harm can be considered in the planning balance by the decision-maker. Where harm to a heritage asset has been identified in this way decision-makers are advised to place great weight on the desirability to conserve or enhance the heritage asset and its significance and avoid the harm. The NPPF advises decision-makers to consider the level of harm in the balance against the public benefits arising from the development and to seek convincing justification for that harm. Public benefits can include public realm and landscaping, affordable housing and/or affordable workspace, heritage and community benefits.

192. Planning Practice Guidance [PPG] 'Effective Use of Land' released on 27 February 2025 states: *"Paragraph 125(c) of the NPPF states planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused. When determining such proposals, decision makers will need to take account of this policy alongside other policies within the Framework taken as a whole. As an example, where a proposal would cause less than substantial harm to the significance of a designated heritage asset, paragraph 215 (which requires the public benefits of the proposals to be weighed against the less than substantial harm) would still need to be applied. Where relevant, decision makers will need to provide a clear articulation of how paragraph 125(c) has been demonstrably considered and applied alongside other policies."*
193. The scheme would deliver regeneration benefits including a contribution to the borough's housing targets (including affordable housing PIL), employment targets and improved public realm. The proposed development would provide a mix of uses that are appropriate for the site's location within the CAZ and Opportunity Area and is in line with the Southwark Plan's ambition and supports the overall transformation within the Elephant and Castle area.



View 1. From Harper Road (Opposite Inner Court Sessions Court car park) includes a rendered version of the proposed development (visible over the tree-line) together with a wireline of the consented Avonmouth House scheme.

194. The Trinity Church Square Conservation Area

The Trinity Church Square Conservation Area is largely made up of Grade II listed Georgian townhouses centred on the Henry Wood Hall. The height of the development has been carefully calibrated so as not to appear in any views from within The Trinity Church Square itself. This is demonstrated in Views 11 and 12 where the development – shown in wireline is below the parapet line of the townhouses and church itself in key views of the conservation area. It is considered that there is no harm arising to the Trinity Church Square Conservation Area as a result of this development.



View 11: This view from within the Trinity Church Square Conservation Area looks southwest from Trinity Street across Trinity Church Square.



View 12: Moving further east, view from outside No. 47 Trinity Church Square Conservation Area

195. St George the Martyr and Borough High Street Conservation Area

The Grade II * Listed St George the Martyr was constructed in 1734-6 and is located in the Borough High Street Conservation Area. Located at the confluence of Borough High Street, Great Dover Street and Marshalsea Road it is a highly significant heritage asset, and its spire is a landmark in all these approaches. Its contribution to the Borough High Street Conservation Area is noted in the adopted conservation area appraisal as an *“important gateway into the Conservation Area, coming both from the many road routes that meet here, and from Borough underground station. The spire of the church is one of the most important landmarks in the area, and is visible within the Conservation Area along Borough High Street from as far as its junction with Southwark Street.”*

196. In View 14 the limited visibility of the proposed development is recognised – visible between the Kite building and Eileen House and appearing just above the prevailing parapet line of the Borough area. In this case there is no harm arising to the Grade II* Listed St George the Martyr church and the conservation area due to this limited visibility, fleeting nature and clear separation between the church and the proposed development.



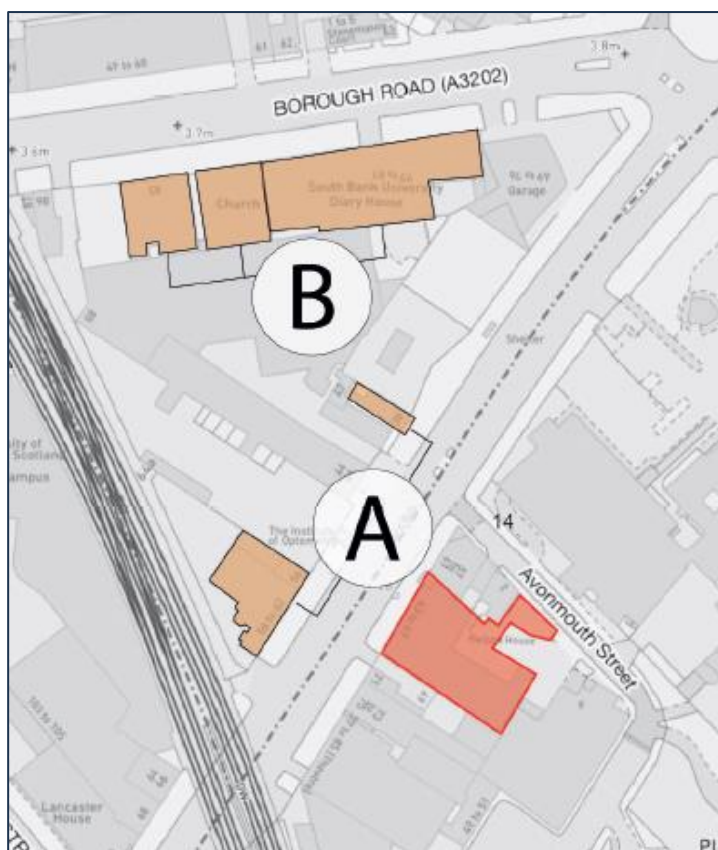
View 14: From Borough High Street Conservation Area with St George the Martyr in the foreground

197. Non-designated assets

The THVIA had identified a number of non-designated heritage assets within the vicinity of the site that could potentially be affected. Officers consider that the most likely to be affected are:

- 56-62 Newington Causeway and 38 Newington Causeway (Group A as indicated in the image below)
- Diary House; 82 Borough Road; and 83 Borough Road (Group B)

Some of the assets have been grouped together when they share the same setting or together form a distinct part of the townscape.



Map: Map showing the non-designated heritage assets in relation to the site outlined in red.

198. 56-62 Newington Causeway and 38 Newington Causeway are located opposite the site. The significance of these locally listed buildings lies in their appearance and their position in the townscape. The viaduct and beyond, the tall buildings of Elephant and Castle now form part of the immediate setting of these locally listed buildings fronting Newington Causeway. The proposed development will be visible to the south of the heritage assets. As its immediate setting is much altered and does not contribute to the ability to appreciate its significance, the proposed development will not result in any harm to the significance of the locally listed building. Furthermore, these locally listed buildings would be demolished under the consented Borough Triangle scheme.
199. The second group of locally listed buildings Diary House; 82 Borough Road; and 83 Borough Road are located further away from the application site. The proposed development may be glimpsed from the ground level looking south sitting to the left of the other tall buildings interspersed across the gap in the built form. Given the distance of these heritage assets and the consented Borough Triangle that would sit between these and the application site, the effect of the development on the locally listed buildings would be negligible and insignificant.

Design Review Panel

200. 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. During the pre-application stage and prior to submission of the application the applicant presented their proposals to the DRP (The 'Panel'). The Panel reviewed and commented on a number of aspects and their comments and officer's responses are summarised below.

201. The Panel generally endorsed the overall principles of the design and expressed their confidence in the design team to resolve the issues they had identified. They raised concerns about the articulation of the tower in the round and encouraged the designers to separate it more deliberately from the base building, to resolve the artificially compromised and overly complex mix of uses in the lower floors.
202. The Panel had concerns over four floors of commercial space as it detracted from the quality of the space and raised a concern about the basement commercial space being adequately lit from the proposed lightwells. They also noted that the front entrance on Newington Causeway did not seem evident and poorly articulated. The Panel encouraged more depths of expression to the façades, with more fenestration enhancement given to the north facing kitchens.
203. Following the Panel's comments the scheme was reviewed and revised prior to submission. The main student entrance and associated facilities were located at the rear accessed from Avonmouth Street. The basement commercial space was omitted and the main entrance located on Newington Causeway. The 'crown' treatment was extended onto all four facades and on Newington Causeway the base was more clearly defined from the tower above.
204. The Panel had commented that there should be more greening and that the roof terrace should be designed so that privacy is maintained to those rooms that front the terrace. In response, the applicant has proposed that these rooms that look out onto this area have their own private terraces and with defensible planting to maintain their privacy. This detail can be secured via a condition.
205. The Panel also commented that 10-12 clusters per floor would be more appropriate, but this has not been amended since the need to optimise the site. Other comments relating to the layout of the student amenity spaces on the ground floor have not resulted in any changes given the site's constraints.

Inclusive Design

206. Policy D5 of the London Plan states that development proposal should achieve the highest standards of accessible and inclusive design. Southwark Plan Policy P14 states that development should provide accessible and inclusive design for all.
207. The principles of TfL's Healthy Streets and active travel is considered to be at the heart of the proposed development and this is discussed in more detail in the Transport section of the report. Amongst other best practice and Building

Regulations Approved document M, the various inclusive access measures within the proposal would include:

208.
 - Accessible approach routes to the PBSA and commercial cores and associated facilities;
 - Accessible cycle storage space for residents including parking spaces for 3 No. oversized bikes through level approach or lifts;
 - Refuse access is controlled by a management system with refuse being picked up from the communal kitchens daily so no wheelchair access is required to the refuse store;
 - 13 of the rooms (5%) are designed for wheelchair users and a wheelchair accessible parking space has been accommodated; and
 - All communal amenity spaces will be fully wheelchair accessible
209. The Metropolitan Police (Designing Out Crime team) was consulted on this application. The Met Police had met with the applicant's design team to discuss Secured by Design principles. They note that due to the likelihood of a high volume of pedestrian traffic, increased security measures which will be covered by Secured by Design certification will be required.
210. The scheme provides for natural surveillance given the active frontages proposed. The landscaping on Avonmouth Street frontage would need to be designed to ensure planting is at appropriate heights to keeping clear lines of sight. Good levels of lighting would prevent offences of violence particularly against women and girls. These would be controlled by conditions.
211. The Met Police recommends a two-part condition that includes requiring a Secured by Design certificate to be submitted for approval; this condition has been recommended to committee.

Fire Safety

212. The Town and Country Planning (Development Management Procedure and Section 62A Applications) (England) (Amendment) Order 2021 establishes that any relevant building is subject to Gateway 1 requirements. Relevant buildings are that which satisfy the 'height condition' and contain two or more dwellings or educational accommodation. The height condition is that (a) the building is 18 metres or more in height; or (b) the building contains 7 or more storeys. The Gateway 1 requirements outline that schemes which feature a relevant building must submit a fire safety statement form and the HSE must be consulted. The council consulted HSE on the application.
213. Policy D12 (B) of the London Plan requires that all major developments must submit a fire statement. The fire statement should demonstrate how the proposals respond to and contain information on the requirements of both parts A and B of the London Plan policy D12 on fire safety. This must be completed by a third-party, independent, suitably qualified person. The council considers this to be a qualified engineer with relevant experience in fire safety, such as a chartered engineer registered with the Engineering Council by the Institution of Fire Engineers, or a suitably qualified and competent professional with the

demonstrable experience to address the complexity of the design being proposed. This should be evidenced in the fire statement. The council accepts fire statements in good faith on that basis.

214. The applicant has submitted a Gateway 1 Fire Statement compiled and reviewed by suitably qualified assessors. The Fire Statement outlines the building construction method, products and materials, evacuation measures, travel distances, passive and active fire safety measures, access and facilities for the fire and rescue service.
215. The residential areas of the building will be served by two cores. One core will be the designated firefighting shaft and will contain a stair, a firefighting (FF) lift and evacuation lift (this will act as FF lift as well in case the primary FF lift fails for redundancy). The other core will contain an escape stair and an evacuation lift. The non-residential areas will be served by two separate cores, each containing a stair and an evacuation lift.
216. Among other things, the Fire Strategy confirms that:
 - The evacuation strategy for the residential areas will be a “stay put” strategy whereby only the unit of fire origin will evacuate. For the cluster accommodation, a simultaneous evacuation strategy will be applied.
 - automatic fire alarm and detection system in the flats;
 - mechanical smoke ventilation system in the residential common corridors at the upper levels;
 - Sprinkler coverage is provided to all the rooms;
 - commercial and ancillary areas greater than 100sqm;
 - Structures will achieve the appropriate fire resistance rating;
 - Wet riser and dry risers inlets;
 - Emergency lighting and escape signage;
 - Fire resistant compartment walls.
217. The building management forms an integral part of the design and on-going functionality of the building after occupation. The building will have a management team whose responsibilities will include ensuring the fire safety strategy is adopted and enforced and this should be included in the final student management plan.
218. The London Fire Brigade did not object to this application. The Health and Safety Executive (HSE) was consulted and their comment was that the fire statement proposes Computational Fluid Dynamics analysis in relation to smoke control and this is noted. It will be for the applicant to demonstrate that appropriate means of escape are provided at subsequent regulatory stages.
219. Following a review of the information provided with this consultation, HSE is content with the fire safety design, to the extent that it affects land use planning considerations.
220. These fire safety details need to be considered in the Building Regulations stage as well. Overall, the proposal would comply with London Plan 12. The proposal also complies with London Plan policy D9, section C.2)a) and D5 on

inclusive design by providing at least one fire evacuation lift per core. A condition is proposed to require compliance with the submitted statement to ensure compliance with London Plan policy D12.

221. The duty to identify fire risks and hazards in premises and to take appropriate action lies solely with the developer. The fire statement covers matters required by planning policy. This is in no way a professional technical assessment of the fire risks presented by the development.

Conclusion on design, heritage, townscape considerations

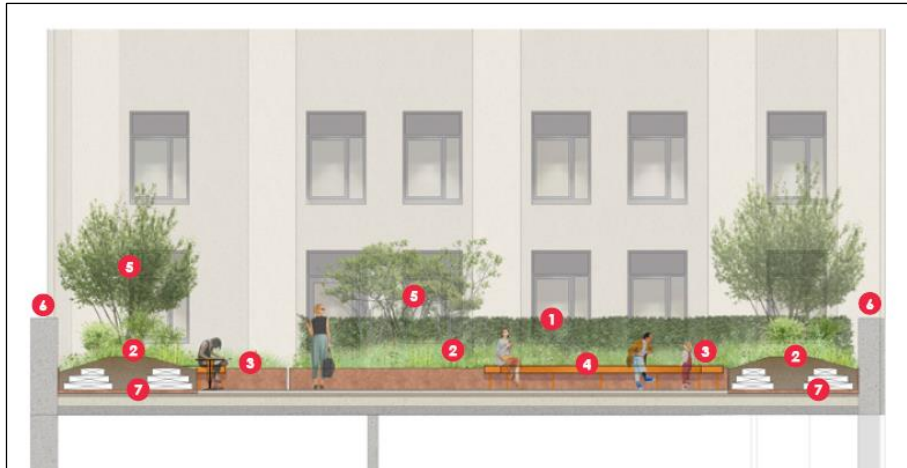
222. When considering the sites existing context parts of it have limited townscape merit and this would be replaced with a building that would have active frontages along all the edges which would be beneficial. The frontage to Avonmouth Street would be improved with hard and soft landscaping. Given that the buildings would be of significant height and density they would need an exemplary standard of design. An additional consideration is that the application site is situated within an opportunity area and a town centre a location where tall buildings are considered to be appropriate. The architectural quality and materials are considered exemplary, and the development will incorporate high-quality sustainable design.
223. Whilst there would be 'Less than Substantial' harm to the setting of the Grade II Listed Sessions Courthouse, this is at the lower end of the scale of harm and the development presents public benefits that outweigh this harm.
224. In conclusion, the overall height and massing strategy are supported. The site is located in an opportunity area and forms the gateway to Elephant and Castle, where tall buildings are an established part of the areas character. The proposal meets the council's primary urban design and heritage policies P13, and P17, P19, P20, P22 and P24.

Landscaping, trees and urban greening

225. An important part of the development is the provision of public realm within the site. The layout of the space is discussed in preceding sections of this report. 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.
226. At the present time the site comprises a building and hard landscaping consistent with a commercial site. Therefore, the opportunity exists for significant improvements to be made in terms of soft landscaping proposals and contribution towards urban greening.
227. The redevelopment of this site would make a valuable contribution to the public realm offer in this location. This application proposes an area of public realm off

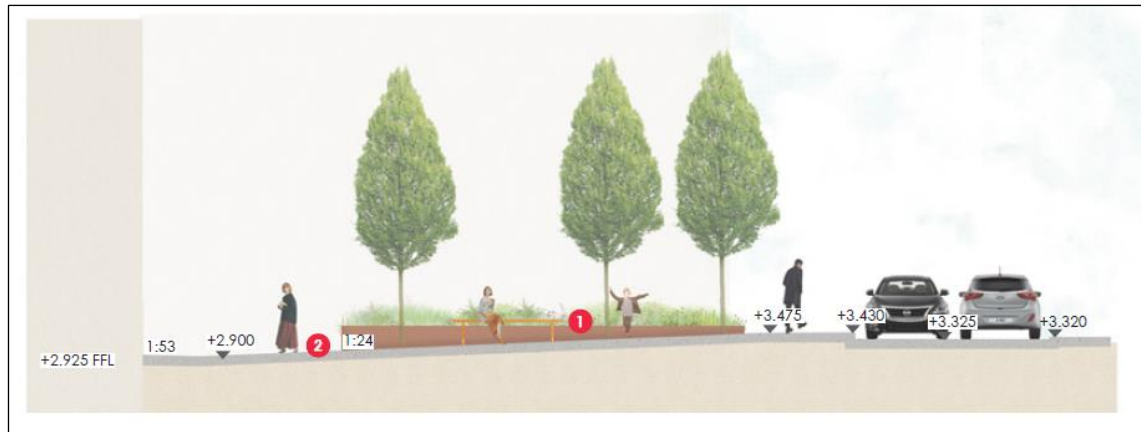
Avonmouth Street, contributing to greening, alongside accommodating access, turning and parking areas. The proposed spaces would maximise soft landscape opportunities within the site, whilst allowing sufficient area for delivery and servicing and line of sight for student entrances. It is expected that the public realm would integrate well with the existing and planned future network of streets and spaces coming forward in the redevelopment of adjacent sites including the Avonmouth House public realm to the southwest.

228. The report confirms that three trees are located to the front of the existing building on Newington Causeway (outside the application boundary and on the public highway). An Arboricultural Impact Assessment, Method Statement and Preliminary Tree Protection Plan has been submitted the proposed development will not directly affect these trees. However, the trees will need to be protected throughout demolition and construction to prevent any accidental/indirect damage. Exclusion zones and methodologies are described in the preliminary arboricultural method statement and tree protection plan and it demonstrates that if these are followed then the existing trees should not be adversely affected by the construction works.
229. A total of 20 trees are proposed. The Urban Forester made comments regarding the planting schedule and to amend the species to more drought tolerant trees. At ground floor level, a number of trees, shrubs and perennial planting is proposed around the yard adjacent to the student entrance. Larger canopied trees are proposed along Avonmouth Street which will help reinforce the green visual link to Newington Gardens and to target urban heat island effects. At third floor level, an external amenity terrace for students is proposed which will include multi-stem shrubs and perennial planting around a seating area. Multi-stem shrubs are more drought tolerant and will limit the weight implications on the structure. Larger multi-stem shrubs screen sensitive edges, particularly to the north of the terrace to prevent overlooking into the adjoining windows at No. 2 Avonmouth Street. There would also be appropriate mounding around the terrace parapet to provide that sense of enclosure and limiting overlooking.
230. The planting palette has been developed which responds to the needs of each character area and the scale of each space. Through planning conditions, the applicant will be required to install the soft landscaping to the agreed specification and maintain it in the long-term. This would ensure the positive contribution to the greening of the site can be realised.



Section: Cross section of the third floor amenity terrace showing trees and mounding

231. Section drawings have been provided to demonstrate that the structure of the building can accommodate the soil volumes and irrigation for the planting proposed. The overall strategy is supported and details of the green roof will be secured by condition.
232. The existing courtyard is generally lower than Avonmouth Street and separated by a low brick retaining wall. Levels will be built up to provide an accessible route to the building entrances. Around the edges of the ground floor a series of seats are set back within planting, offering opportunity to relax.



Section: Cross section of ground floor with appropriate gradient

233. In terms of the hard surfaced material strategy, it is proposed to use three types of materials. The servicing courtyard would be a permeable block paving to match Avonmouth House Scheme. The pedestrian routes would be textured concrete setts in a warm tone and the area below the trees would be of porous self-binding resin-bound gravel. The existing footway on Newington Causeway and Avonmouth Street will be upgraded in line with Southwark's Design Guide standards, through agreed S278 works.

Urban Greening

234. 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.
235. A comprehensive approach to greening has been taken at multiple levels, be that at public realm on street and through the third floor landscaped terrace and green roof. This introduction of new green spaces looks to significantly enhance the UGF of the existing site. The details submitted indicate that the development will achieve a UGF score of 0.34% which falls below the recommended guidance score. Officers had sought for an increase in the UGF score, but it is considered that the applicant has achieved planting in the majority of the plantable space and it is limited given the need to provide the servicing yard. As such, the provision for further trees is being sought via s106 for trees within the vicinity (i.e. potential on adjoining street and green space) at

£4,000 per unit to bring the total figure to 0.4. A total of 14 trees of 14-16cm circumference are required, equalling £56,000. This mitigation measure is considered necessary and appropriate for this particular scheme.

Ecology and Biodiversity

236. Within the immediate landscape, priority habitats are restricted to small pockets of urban woodland. The nearest being Newington Gardens, approximately 40m from the red line boundary. Newington Gardens is not designated but is considered to be functionally linked to Dickens Square Park Site of Local Importance for nature Conservation (SINC) and Tabard Gardens SINC. Due to the distance of the development from these sites, and urban landscape, there would not be a significant ecological impact on these sites.
237. Ecological enhancements will be incorporated into the design which include a biodiverse roof, extensive planting on the terrace as well as landscaping on Avonmouth Street and around the main student entrance.
238. 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' (BNG) 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.

Biodiversity Gain Hierarchy

239. The Biodiversity Gain hierarchy sets out a list of priority actions:
 - first, in relation to onsite habitats which have a medium, high and very high distinctiveness, the avoidance of adverse effects from the development and, if they cannot be avoided, the mitigation of those effects; and
 - then, in relation to all onsite habitats which are adversely affected by the development, the effect should be compensated by prioritizing the enhancement of existing onsite habitats, creation of new onsite habitats, allocation of registered offsite gains and finally the purchase of biodiversity credits.
240. Planning regulations require an assessment of whether the proposed habitat works to deliver biodiversity net gain onsite will deliver a significant increase in the biodiversity value of the site, compared to the pre-development biodiversity value. The distinctiveness, condition and size of the biodiversity habitat to be delivered are all considerations which must be balanced.
241. Non-significant enhancements are habitat enhancements whose loss will not significantly decrease the development's biodiversity value.

242. In order to satisfy the BNG requirement, a statutory metric has been submitted and is accompanied by a BNG report. The value of the pre-development site has been established based on the findings of the baseline habitat survey.
243. The BNG to be provided as part of this development is considered to be significant.
Government guidance (PPG Biodiversity, 2024) on determining whether BNG to be delivered on a development site is 'significant' sets out five factors. These are set out below.

Government Guidance on <u>Significance</u>;	Assessment
Does the proposed habitat delivered contain;	
Habitats of medium or higher distinctiveness in the biodiversity metric.	The following area based habitats are being created which have a distinctiveness of medium: Urban Tree
Habitats of low distinctiveness which create a large number of biodiversity units relative to the biodiversity value of the site before development.	The low distinctiveness habitat 'Other green roof' proposes to deliver 0.04 units.
Habitat creation or enhancement where distinctiveness is increased relative to the distinctiveness of the habitat before development.	N/A
Areas of habitat creation or enhancement which are significant in area relative to the size of the development .	Urban trees are proposed to deliver 0.0407 ha.
Enhancements to habitat condition e.g. from poor or moderate to good.	N/A

244. The baseline value of onsite habitats was calculated to be 0.02 biodiversity units.
The post-development habitats have been identified based on the proposed landscape drawings. The application proposes an increase of 0.13 units to 0.15 units. This equates to a 652.68% gain. The development therefore exceeds the national BNG target of 10% BNG achieving the requirements of London Plan policy G6 part D and Southwark Plan policy P60.
245. Habitats would need to be monitored to ensure correct establishment and growth, and remedial action would need to be taken if this does not proceed as

expected, otherwise the target conditions used in the calculations may not be met and the predicted biodiversity units might not be achieved. A S106 legal agreement will therefore be required to secure the biodiversity gain for 30 years. A monitoring fee will be required as part of the S106 agreement to cover the cost of periodic monitoring over 30 years. A Habitat and Management and Monitoring Plan will be required post-approval to set out the management arrangements.

246. The council's Ecologist and Urban Forester have reviewed the application information and deemed the proposal to be satisfactory. The greening and biodiversity improvement of the revised scheme are supported. Subject to the proposed conditions, the proposal would comply with policies G1, G5, G6 and G7 of the London Plan and policies P59, P60 and P61 of the Southwark Plan.

Impact of proposal on development potential of nearby land

247. 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.
248. As discussed previously, the scheme has been amended with the windows on the flank southern elevation removed and replaced with a recessed brick panel that would appear consistent with the rest of that façade. This would not prejudice the future development that might come forward at No. 69-71 Newington Causeway. Whilst there are northern windows proposed at the boundary adjoining Balppa House, these are corridor windows and are not habitable.

Amenity impacts on nearby residential occupiers and the surrounding area

Outlook and Privacy

249. As previously outlined, with regard specifically to preventing harmful overlooking of dwellings, as outlined previously, the Residential Design Standards SPD 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.
250. The quality of accommodation section of this report had previously discussed the privacy distances between the proposed building and No. 2 Avonmouth Street and Avonmouth Street were found acceptable.
251. The distance between the windows in the development and any future residential property in the Borough Triangle development would exceed 12m across a highway, complying with the above standard.

252. In terms of outlook, the view from the existing neighbouring residential properties will inevitably change. Nevertheless, the change in the view in this dense town centre location and opportunity area does not mean a loss of outlook. Loss of outlook occurs where development would have an adverse overbearing effect that would result in an unduly oppressive living environment for existing and future residents.
253. It should be noted that the existing office building is already at close proximity to the windows of Balppa House and No. 2 Avonmouth Street. The upper floors of the proposed building would step back to avoid a significant overbearing impact on the neighbouring occupiers. There will be impacts on the daylight and sunlight to the nearby properties, which is discussed below.

Daylight and sunlight

254. 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 (as long as the resulting scheme would provide acceptable living standards)”*. The intention of this guidance is to ensure that a proportionate approach is taken to applying the BRE guidance in urban areas. Southwark Plan policies identify the need to properly consider the impact of daylight/sunlight.
255. The daylight tests used are based on BRE guidance on daylight and sunlight. The BRE guidance sets out the rationale for testing the daylight impacts of new development through various tests. Although the BRE guidance was updated in June 2022, the assessments for the impacts upon neighbouring properties remain the same as the earlier BRE guidance.
256. The following scenarios have been assessed and are reported and are discussed further below.
- Baseline;
 - Proposed Development; and
 - Cumulative.

The assessment utilised the following methodologies outlined below.

257. VSC

The Vertical Sky Component assessment (VSC) is a test that 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. Only those surrounding properties that have windows facing towards the site were included in the assessment. If a

nearby property has no windows facing the site, these properties would not be affected by the proposed development in terms of daylight.

258. No Sky Line

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% (ratio of 0.8) in the area of sky visibility, daylight may be affected.

259. APSH

The BRE guidance recommends that sunlight is tested on the basis of Annual Probable Sunlight Hours (APSH). It should be considered for all windows facing within 90 degrees of due south (windows outside of this orientation do not receive direct sunlight). The guidance advises that windows should receive at least 25% APSH, with 5% of this total being enjoyed during the winter months. If a window receives less than 25% of the APSH or less than 5% of the APSH during winter, and is reduced to less than 0.8 times its former value during either period and has a reduction in sunlight received over the whole year of greater than 4%, then sunlight to the building may be adversely affected.

260. The following surrounding properties contain residential accommodation and have been considered due to their proximity to the development site.

- Telford House
- Stephenson House
- 57-61 Newington Causeway (Balppa House)
- 2 Avonmouth Street

261. The daylight assessment also tests the future student development at Avonmouth House, which is being constructed. At the same time, the consented Avonmouth House and Borough Triangle cumulative schemes are tested as future sensitive receptors to changes in daylight and sunlight from the proposed development.

262. Telford House

This building is located within the Rockingham Estate, to the south of the site. For VSC a total of 30 windows were tested and 14 of those windows go beyond the BRE guidance (a percentage loss of more than 20%). The greatest proportional loss is 29.9%. However, there are access decks above those windows in Telford House. Discounting balcony effects (in line with BRE guidance), the largest proportional reduction to any windows is 14.2%. This is comfortably below the guideline threshold of 20%.

263. The BRE guidance notes that balconies cut out light from the top part of the sky, even a modest obstruction opposite may result in a large relative impact on the VSC, and on the area receiving direct skylight. The alternative assessment discounting the balconies show that the presence of the balcony, rather than the size of the new development, was the main factor in the relative loss of light.

264. For NSL, 6 of the 30 rooms assessed slightly breach default guidance, in each case the reductions to these rooms are between 23.4% - 26.7%. This is not considered to be significantly in excess of the guideline 20%. Overall, the reductions are mainly due to the existing access-decks.
265. In terms of sunlight effects, the site is located to the north of the property and therefore sunlight is not an issue.

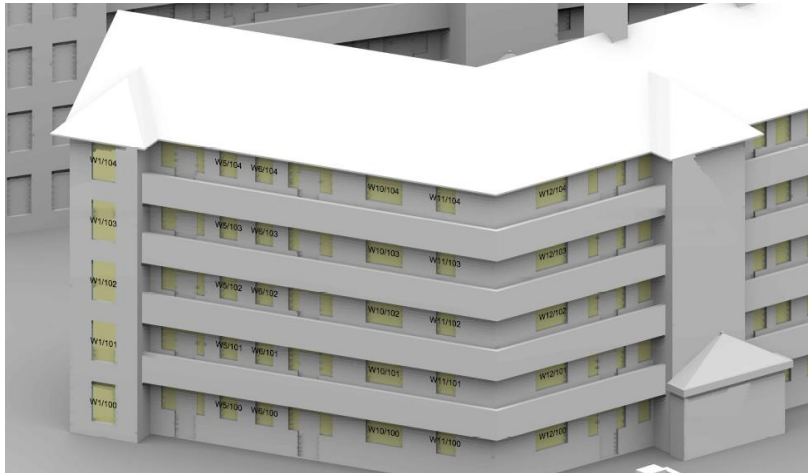


Diagram: Window map of Telford House

266. Stephenson House
 These flats are located to the south of the site. As with Telford House, the potentially affected habitable rooms are a mixture of bedrooms and kitchens. The main living rooms within these flats are located on the opposite side of the block, and as such will be unaffected.
 All of the windows and rooms assessed accord with the BRE VSC and NSL guidance and therefore there will not be any material daylight effects on this property. As the site is located to the north of the property, sunlight is not an issue.

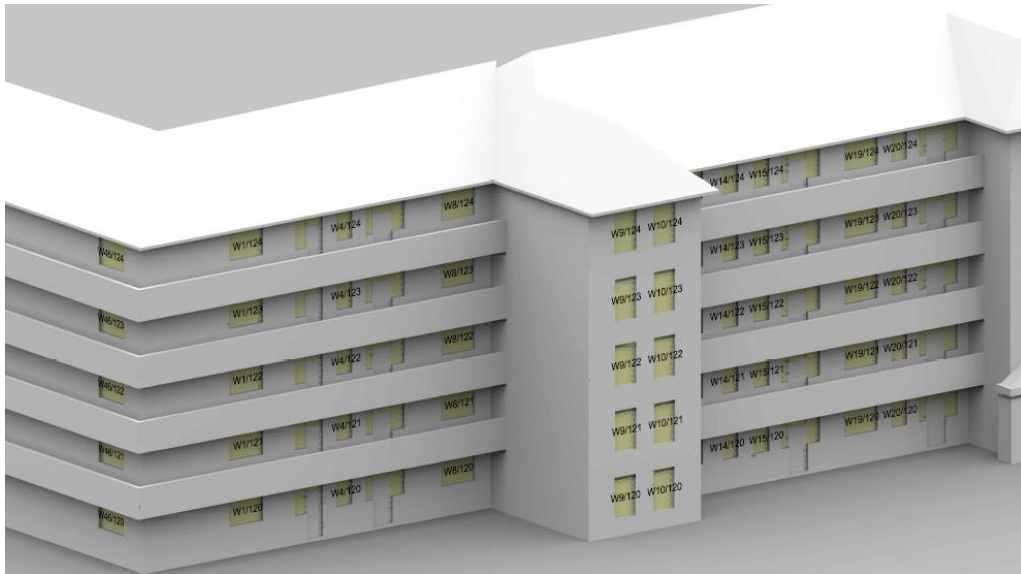


Diagram: Window map of Stephenson House

267. 57-61 Newington Causeway (Balppa House)

This block of flats is located immediately adjacent to the development site to the north. The applicant had sourced layout information for the property. The affected windows that face or adjacent to the development serve kitchen and bedrooms. The windows serving the main living room areas within these flats are located on the opposite side of the building and will therefore not be affected by the redevelopment of the site.



Plan: Floorplan of Balppa House obtained by the applicant

268. The analysis of this property considers the effects on 7 rooms, which are served by a total of 10 windows. There are three rooms assessed that are dual aspect LKD rooms. In relation to these spaces, the windows serving the kitchen areas are located to the rear of the property. The windows serving the main living room areas within these spaces are located to the front of the property, and as noted above will not be affected by the development.
269. In terms of daylight, the layout and footprint of Balppa House means that the windows to the rear of the property are constrained. This would also limit light reaching them in the existing situation and is relatively low. The applicant points out that a small reduction in VSC can result in a large proportional reduction and Officers agree with this point.
270. There are three windows (to bedrooms) that have large proportional reductions in VSC (ranging from 65.9% to 79.2%). The absolute reduction in VSC is however very minor. For example, from an existing VSC of 4.63% to 1.58% is roughly 3% but proportionally is a reduction of 65.9%. The table below shows the existing vs proposed VSCs of these three windows to illustrate the above.

Existing VSC	Proposed VSC	Absolute loss
4.63	1.58	3.05

6.65	1.86	4.79
10.76	2.23	8.53

271. The daylight reductions to the windows serving the kitchen areas within the dual aspect LKD rooms are small and in full accordance with BRE guidance. The applicant notes that a first floor kitchen would see improvements in daylight levels once the development is completed because the footprint is slightly set back from the boundary compared to that of the existing building.
272. For NSL, the 3 bedrooms would experience similar reductions with absolute losses of 17.5, 18.4 and 30.5, translating to proportional loss being between 54.7% to 66.9%. The 4 other habitable rooms tested would accord with BRE guidance.
273. Overall, whilst the proportional reductions would be significant, these affected rooms are bedrooms and therefore is less sensitive to daylight reductions as their primary use is for sleeping.
274. The BRE guidance does state that bedrooms are less important, although care should be taken not to block too much sun. Normally loss of sunlight need not be analysed to kitchens and bedrooms, except for bedrooms that also comprise a living space. In this instance, the applicant has included an assessment of the bedroom windows for completeness. In terms of sunlight effects, 7 of those 10 windows assessed would accord with BRE guidance. Like the daylight assessments to this property, there would be some noticeable reductions. Overall, whilst there would be some noticeable reductions, these are to bedrooms. The sunlight effects to Balppa House are not considered to be significant.

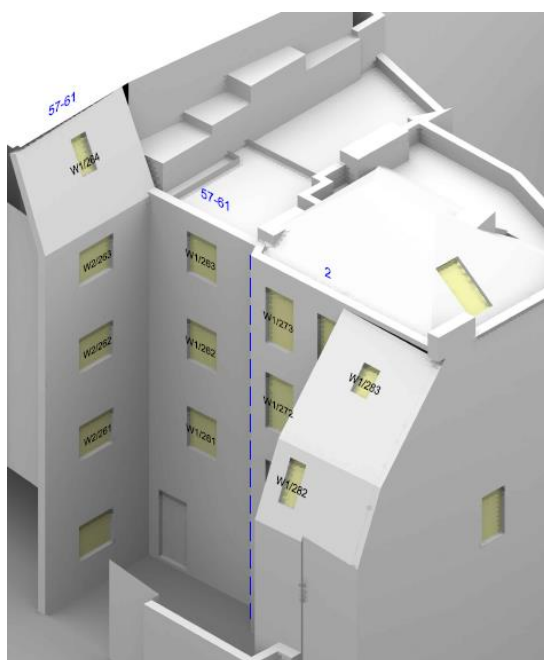
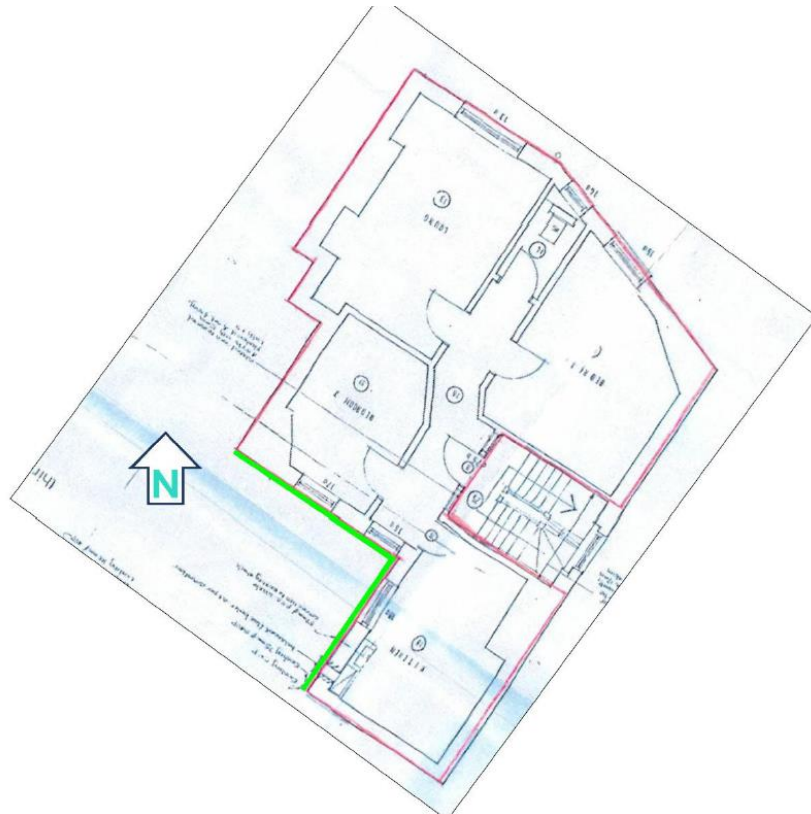


Diagram: Window map of Balppa House

275. No. 2 Avonmouth Street

This block of residential flats is located in very close proximity to the north of the site. The property has windows that directly face the site, located less than 4.5 metres from the boundary. Given this proximity, any development on the application site would result in some noticeable reductions in daylight and sunlight. The applicant has sourced layout information for the property (shown in the image below), and this confirms that the site facing windows (located in the elevations highlighted green) serve second bedrooms and kitchens.



Plan: Floorplan of No. 2 Avonmouth Street

276. The original submitted Daylight and Sunlight (V1 dated December 2024) had omitted two windows from No. 2 Avonmouth (top two floors) and subsequently submitted a Daylight and Sunlight Addendum (March 2025) to provide an analysis.

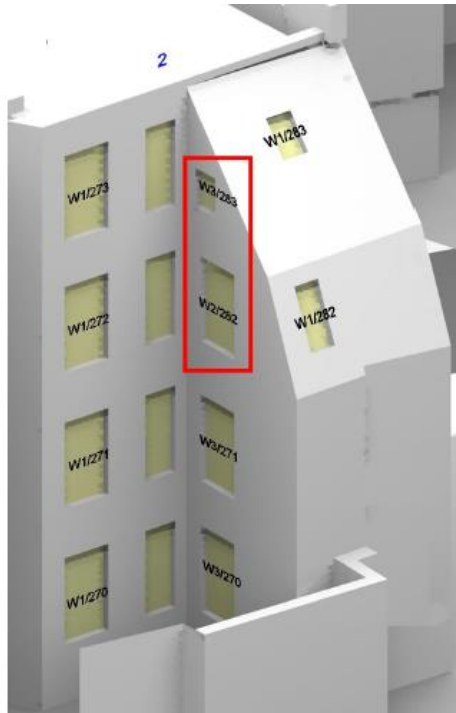


Diagram: Window map of No. 2 Avonmouth Street and the two windows outlined in red now included in the assessment.

277. The site facing windows are located to the rear of the property in a constrained location, meaning that existing light levels are relatively low. The kitchen windows on the ground and first floor levels of No. 2 Avonmouth have existing VSC levels of 2.46% and 3.92% respectively, which are already very low. As noted above, this would mean that even a small absolute reduction in light can give rise to a large proportional change (around the mid 50%). The resultant absolute reduction is only 1.38% and 2.19%, which is considered very minor, and the loss may be less noticeable. For NSL, the reduction to these kitchens would meet the BRE guidance.
278. The second and third floor kitchen windows would also experience similar noticeable reductions in their VSCs (over mid 50%), but it is noted that these kitchens are served by roof windows. When considering the NSL to these second and third floor kitchens, the proportional reductions would be 27.9% and 33.5% respectively.
279. The bedroom windows that face the site have very low VSC levels in the existing situation. Similar to the lower-level kitchens within the property, the column of 4 site facing bedrooms all receive VSC levels below 15% in the existing situation. While these will experience proportional reductions in VSC of circa 68-89%, the absolute reduction is not significant. Similarly, the NSL reductions would be circa 55%-71%, but again these are bedrooms where daylight is less important.
280. The table below lists the existing and proposed VSC and NSL for the abovementioned 4 windows.

Existing VSC	Proposed VSC	Absolute Loss VSC	Existing NSL	Proposed NSL	Absolute Loss NSL
4.76	0.53	4.23	24.3	6.9	17.4
6.92	1.46	5.46	35.2	15.7	19.5
10.66	3.37	7.29	47.9	17.4	30.5
14.48	3.99	10.49	58.2	17.1	41

281. In terms of sunlight effects, 4 bedrooms and 2 kitchens have been tested as they are served by windows facing within 90 degrees of south. The figures show that there would be a noticeable effect on the bedrooms (88% and above in the ground and first floor bedrooms) and 46.7% loss of APSH for the second-floor kitchen. Nevertheless, the BRE guidance does suggest that bedrooms as well as kitchens are less important where people prefer it in the morning rather than the afternoon.
282. The third-floor kitchen at No. 2 Avonmouth Street would have less of an effect, retaining 29% of APSH and 11% in winter. Following the submission of the Daylight report Addendum, it demonstrates that those originally omitted windows do not face within 90 degrees of due south and therefore are not material for sunlight assessment. However, the applicant notes that as the kitchens they serve also have a south facing window, to understand the overall position in relation to these rooms they have been included. The sunlight assessment demonstrates that by including the omitted windows on the second and third floor, there is no material effect on the overall kitchen sunlight levels.
283. In summary, whilst there would be noticeable effect on the sunlight levels, these are to bedrooms and most of the kitchens whereby the BRE guidance does state that loss of sunlight need not be analysed to these rooms. The close proximity of these windows and rooms to a site allocation development site would inevitably mean that there would be noticeable losses.
284. Avonmouth House
This building under construction is located to the east of the site. The applicant has carried out an assessment on the lowest 2 levels of student accommodation at 2nd and 3rd floors. There are 16 windows on each floor that have been tested. At the second-floor level, 13 of those 16 windows would comply with the BRE guidance. The remaining 3 windows all experience proportional reductions in VSC of between 20.9% and 21.28%. . It should also be noted that 2 bedrooms on that level would experience an improvement in their daylight levels once the proposed development is in place. This is because the parapet height would be reduced close to the boundary with Avonmouth House.
285. At the third floor level, 10 of the 16 windows would see proportional reductions of between 21.6% to 34.08%. Whilst these exceed the BRE guidance, the overall effects are not considered major. Those windows experiencing the noticeable effects retain VSCs of late teens and mid-20s, which is considered to be relatively good. The 2 windows that retain VSC levels lower than that are at 12% and 15.6%, which is considered to be acceptable in this dense urban

location.

286. None of the windows at Avonmouth House are orientated within 90 degrees of south and therefore the sunlight tests were not carried out.

Overshadowing

287. The 'Time in Sun' analysis (or Sun Hours on Ground) was used to assess overshadowing. This methodology of assessment determines the extent of overshadowing on surrounding public and private amenity areas. The BRE Guidelines suggest that 'sun hours on ground' assessment should be undertaken on the Equinox (21st March and 21st September) and recommends that at least half (50%) of an amenity area should receive at least 2 hours of sunlight on March 21st or the area which receives 2 hours of direct sunlight should not be reduced to less than 0.8 times its former value (i.e. there should be no more than a 20% reduction).
288. For overshadowing, all public areas of open space such as parks and squares, neighbouring communal amenity areas and private gardens are considered highly sensitive. The surrounding amenity areas sensitive to overshadowing are Newington Gardens (to the east of the site) and Avonmouth House. The assessment shows over 99% of the area will continue to be able to receive at least 2 hours of sunlight after development.
289. The analysis undertaken on overshadowing for Avonmouth House includes the consented Borough Triangle development and it shows that this amenity space at Avonmouth House remains well sunlit with the space receiving at least two hours of sunlight on March 21st to 94% of its area versus the 50% target.

Cumulative schemes scenario

290. This scenario consists of the proposed development in conjunction with the following relevant consented cumulative schemes in the context of the surrounding environment:
- Avonmouth House
 - Borough Triangle

This scenario assesses the potential cumulative daylight, sunlight and overshadowing on the surrounding residential receptors and amenity spaces. Due to their planning status, scale and/or distance from the site, no other cumulative schemes have been identified to be likely to generate additional daylight, sunlight and overshadowing effects to sensitive receptors in combination with the proposed development.

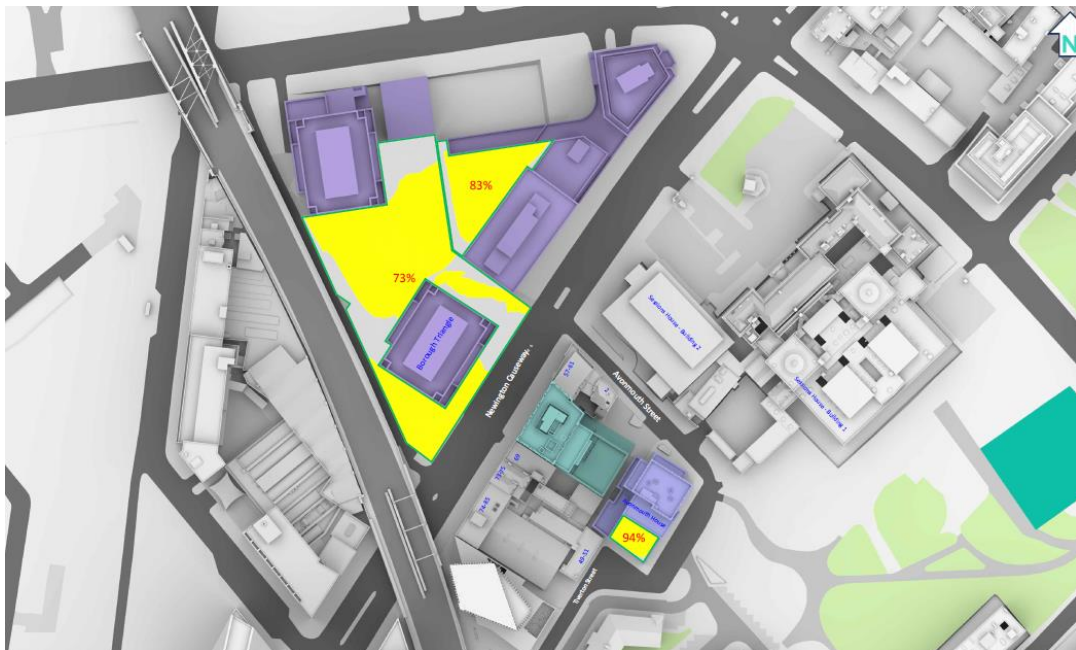
291. In terms of daylight impacts, the 'existing' figures in the cumulative assessment show the position prior to the redevelopment of the Avonmouth House site. The existing VSCs and NSLs levels would therefore be higher than the first scenario and assessments outlined above.

that appear to have a much lower VSC in the cumulative scenario are the LKDs north facing windows, away from the development site. The effects on the windows serving these main living room areas (W3/261, W3/262 and W3/263) all result from the Borough Triangle Development.

296. In terms of NSL effects, the proportional reductions are not dissimilar to the first scenario. It is mainly the LKDs that are affected and appears to result from the Borough Triangle development.
297. In terms of sunlight effects in the cumulative assessment the losses would be greater, in particular to the LKDs. However, 3 No. combined LKDs would retain 20%, 24% and 33% APSH respectively. As such, one of the three LKDs meets the BRE target value for sunlight with the other two missing the target 25% by a small amount. These are considered minor adverse transgressions from the target value.
298. 2 Avonmouth Street
In terms of the VSC, the proportional reductions in the cumulative scenario are greater than the proposed scheme. The assessment shows that the inclusion of the Borough Triangle scheme in the assessment reduces absolute retained VSC values at these windows by circa 1.5% - 2.5% but gives a large proportional reduction. Again, the original VSC levels are already low and any development adjoining No. 2 Avonmouth House would lead to a greater proportional loss. In terms of NSL effects, the proportional reductions are not dissimilar to the first scenario.
In terms of the sunlight effects, the noticeable reductions are to the kitchens on the upper two levels but are not that dissimilar to the first scenario.
299. Avonmouth House
The results show that 14 out of 32 windows retain more than 20% of their existing VSC level in the cumulative position. Of the remaining 18 windows, 13 retain at least 14% VSC in absolute terms. The final windows serving bedrooms, retain 12% VSC in absolute terms. Again, retained VSC values in the mid-teens have frequently been considered acceptable by local authorities and are common in an urban environment, particularly in areas identified for regeneration, as is the case with this site.
As such, given that most windows either comply with BRE guidance or retain at least 14% VSC in absolute terms, with just 1 window retaining slightly less VSC, the overall impact to this building in the cumulative position is considered acceptable. In terms of the NSL, only 4 bedrooms would see proportional reductions greater than the BRE guidance of 20%, rooms which are considered to be less important in terms of daylight.
300. Borough Triangle
The applicant has not provided a detailed analysis on the impact on Borough Triangle development once that comes forward. Nevertheless, the applicant has reviewed the potential impacts on their internal daylight and sunlight.
301. Building B of the Borough Triangle development is located opposite the site, across Newington Causeway. This is the only block within Borough Triangle

that could potentially be affected by the proposed scheme. It will contain residential accommodation at 1st floor level and above. If Building B were to be constructed before this proposed scheme, then there would be some noticeable daylight and sunlight reductions to the lower residential floors. The applicant provided Waldram diagram for this assessment. The retained VSC value to the representative first floor window location is 20.85%. This is therefore comfortably above the mid-teens target that is often considered acceptable in locations such as this. In relation to NSL, it is anticipated that overall effects would be relatively minor, and consistent with those commonly associated with urban development.

302. Regarding sunlight, the retained sunlight levels to the representative point assessed will be 36% of total APSH, with 10% in winter. This is therefore comfortably more than the default BRE targets of 25% of APSH with at least 5% in winter.
303. The results show that both amenity spaces within the Borough Triangle development remain well sunlit with the proposed development in place with the spaces receiving at least two hours of sunlight on March 21st to 73% and 83% of their areas respectively versus the 50% target.



304. Kings Place

Kings Place on the corner of Harper Road and Borough High Street is a PBSA and key worker housing development further to the north-west of the site that was granted planning permission in 2024. The applicant has produced Transient Overshadowing diagrams and demonstrates that King's Place and its amenity spaces would not be materially affected from the proposed development.

305. It can be concluded that there will be moderate and major adverse effects to neighbouring properties. Nevertheless, this is a site that is within a site allocation in a dense urban location whereby tall buildings are anticipated. Some of those losses are in bedrooms where daylight and sunlight are considered to be less important. In relation to daylight, sunlight and overshadowing, Members should note that these BRE guidelines are not a rigid set of rules but are advisory and need to be applied flexibly according to the specific context of a site. It is also important to note that the existing scale of development on the application site is low for an urban location. As a result, reductions would be expected to result from any development here. Taken in the balance as set out above, and considering the sites context the impacts are overall considered to be acceptable.

Archaeology

306. The site is within an Archaeological Priority Area (North Southwark and Roman Roads). The applicant has submitted a desk-based assessment that adequately details the archaeological potential of the site. Much of this interpretation is based on the adjacent excavations at Avonmouth House, where roman archaeology, largely in negative features, survived despite the impacts from the building previously occupying the site. This material is likely to continue into the adjacent development site here, but development impacts may have been greater due to its presence on the main road. To manage the archaeological interests of this site and comply with policy P23 'Archaeology' of the Southwark Plan conditions for the archaeological evaluation of the site, subject to the results of this work further archaeological mitigation work, the control of foundation and the submission of a timely archaeological report should be secured by condition. The archaeological evaluation works will need to be undertaken following the demolition of the buildings on site, but prior to any groundworks to manage the foundation impacts.

Transport and highways

307. London Plan policy T1 seeks to achieve a strategic target of 80% of all trips in London to be made by foot, cycle or public transport by 2041, and policy T2 requires developments to deliver improvements to support the ten Healthy Streets indicators, reduce the dominance of vehicles and be permeable by foot and cycle. Further policies in the London Plan set out cycle parking and car parking standards, and the management of safe deliveries and servicing. Southwark Plan policy P50 seeks to minimise highways impacts and maintain safety, while policies P49, P51, P52, P53, P54 and P55 set out further requirement on different aspects of transport.

Site layout

308. A segregated pedestrian access route is provided from the back edge of the public highway to the front door of the PBSA and Commercial entrances and this is considered to provide a safe, accessible and welcoming route to the building. Gradients were requested and the Transport Planning Team and Southwark Highways team raises no objections. The scheme would open up the existing car parking yard, removing the existing low level wall and replaced

with landscaping and providing a shared delivery space. No change will be made on Newington Causeway.

Trip generation

309. For the PBSA element, the site is predicted to generate 23 person trips in the AM peak, and 29 person trips in the PM peak hours. The modal share analysed are pedestrians, cyclists and public transport users and none of these are car users. 13 delivery trip per day are associated with the PBSA, which is not considered to be significantly high.
310. A total of 76 number of trips would be generated with the commercial element, with most of those arriving by foot or public transport. In terms of delivery trips, it is anticipated that there would be 8 daily. The total number of delivery and servicing trips would therefore be 21 per day. The methodology presented for the modal split of the residential and non-residential land uses at the site are also considered appropriate and are considered to reflect the excellent accessibility and central location of the site which has a PTAL rating of 6b (the highest rating).
311. It is not considered that the scheme would generate an adverse impact on the local highway network together with the other mitigation secured such as the initiatives in a Travel Plan that will be required post-permission. The Travel Plan Coordinator will update the Travel Plan annually following the Travel Surveys and will review progress towards meeting the targets. They will be responsible for implementing the measures and initiatives in the report to encourage residents to travel by sustainable modes of transport such as walking, cycling and public transport. A s106 contribution of £2,790 will be secured for the monitoring of the Travel Plan.

Healthy Streets

312. 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.
313. A day and night-time Active Travel Zone (ATZ) assessment has been completed, but no improvements to the identified routes have been proposed. However, the segregated pedestrian route with appropriate gradient would be an improvement. This will make for a safer and more accessible public realm, and one that is more attractive to those considering travelling on foot or by bike.
314. The Council's own Transport Policy team has requested a financial contribution of £250,000 towards the Newington Causeway bus and cycling scheme, which is proposed for this section of street to connect in with this scheme's s278 works, which the applicant has agreed.

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

Servicing and Delivery

316. London Plan Policy T7 relates to servicing and delivery arrangement during construction and 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.
317. The Delivery and Servicing Management Plan (DSMP) sets out the anticipated number of deliveries and how these will be managed in order to ensure the successful operation of servicing at the proposed development. The numbers have been reported above and considered reasonable.
318. The servicing area for both commercial and PBSA elements in the courtyard off Avonmouth Street will allow delivery and servicing vehicles to access the site in a forward gear, turning on the site, then exiting in a forward gear. These have been shown in tracking diagrams. There is sufficient space for 2 No. LGV / box van within that courtyard proposed and this number is considered adequate for the size of the development. An onsite management company will assist with deliveries and servicing by:
- Ensuring drivers switch their engines off when stationary; and
 - Be available to receive all relevant deliveries from suppliers at the concierge located on the site.
319. A detailed DSMP will be required and will be secured in the s106 agreement. In order to ensure that on-street servicing and deliveries do not negatively impact on the highway network, the Council is recommending that applicants provide a DSP monitoring fee of £2,790. 'No Parking' hatching in the key areas was also recommended by the Transport planning team to avoid the car park becoming full with management staff vehicles and maintenance vans. This shall be conditioned.
320. Servicing hours to all of the proposed uses would be restricted by condition, as follows:
- 08:00 to 20:00 Monday to Saturday; and
 - 10:00 to 18:00 on Sundays and Bank Holidays.
321. 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. The submitted Student Management Plan has set out that measures to help with the move in/move out process. Principles such as management staff will be waiting for students with luggage trolleys to allow for quick unloading of vehicles, and movement of possessions to the

accommodation, meaning that risk of overrun of allocated timeslots will be minimised. It also notes that arrivals/departures will be staggered over a number of weekends and there is anticipated to be space for up to 2 vehicles at any given time. Co-ordination with the nearby existing and (assuming implementation) approved student blocks in the Elephant and Castle area as well as Avonmouth House has been recommended by TfL.

322. The 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

323. The development will be provided with separate food waste, general waste and recycling bins for commercial and student elements. Waste would be collected by a private contractor and the refuse vehicles would utilise the servicing courtyard. The tracking diagrams for a smaller refuse vehicles show that they would be able to enter and exit in forward gear. A refuse bin holding/staging area is proposed for collection days to minimise the drag distance.
324. If the private contractor fails to collect the waste, the council has a duty to collect residential refuse and larger refuse vehicles cannot service within the courtyard. The applicant has committed to using private waste contractors to manage the waste, but in the event that this falls through then the applicant proposes a dropped kerb to allow for council refuse collectors to easily drag the bins from the staging area to the collection point. The location of the dropped kerb has been agreed in principle by the Highways team and details will be secured by s278 agreement.



Plan: Tracking diagram for refuse vehicle

325. Through an obligation in the S106 agreement, the developer is obliged to ensure that a contract is in place with a commercial provider of refuse/recycling collection services for both the PBSA and commercial uses for the lifetime of the development. The operators will be expected to keep refuse within the demise of the property and collect the refuse within the service yard. Other S278 Highways works are listed in the s106 table in this report.

Car parking

326. 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.
327. 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 Electric Vehicle Charging Points (EVCPs)
328. Wheelchair car parking provision
One blue badge car parking space is provided on site, in the shared courtyard with Avonmouth House. This will be shared between the two sites, and utilised when allocated to a student / staff member with a blue badge. Whilst this falls below the three per cent requirement in London Plan Policy T6, it should be noted that the site's location close to numerous and regular bus routes and Elephant and Castle and Borough Stations, as well as its high PTAL rating, residents would benefit from a range of public transport options.
329. EVCPs are required to meet the London Plan standards. This means that the isolated disabled parking bay for the PBSA must have an active EVCP upon occupation. The applicant has confirmed this will be active EVCP and this will be secured by condition. The blue badge car parking provision will be retained perpetually which would be secured by a S106 agreement.
330. Through an obligation in the S106 agreement, all residents of the proposed development would be exempted from applying for parking permits.

Cycle parking

331. 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.
332. Separate cycle stores are provided for both the PBSA and commercial elements of this scheme. Both stores have access routes via a single lift and stair access.

Element	Description and type of cycle store	Number of spaces
PBSA	Cargo bike	2
	Josta 2 tier	162
	Sheffield stand	18
Commercial	Cargo bike	1
	Josta 2 tier	20
	Sheffield stand	1

Table:***Proposed cycle types and spaces***

333. Accordingly, 182 long stay spaces are proposed for the student residential element, 22 long stay spaces for the commercial element, with 12 short stay spaces. Cycle number calculations have been based on 0.75 spaces per bedroom. Following comments from the Transport Planning team, the scheme would now propose two PBSA adapted cycle spaces and 1no. commercial adaptable space and this is considered acceptable. There would also be power-assisted doors, which is welcomed. A condition requiring all doors to the cycle stores to be power assisted is recommended.
334. Visitor cycle parking is provided in the form of 3 Sheffield stands for 6 visitor cycle parking spaces within the site's red line boundary to the Avonmouth elevation, adjacent to the PBSA entrance, and further visiting cycle parking to be provided to the Newington Causeway frontage via 'to be agreed' s278 works. This is considered acceptable given the site constraints.
335. The PBSA cycle store is designed broadly in line with the requirements of London Cycle Design Standards and London Plan 2021. The commercial cycle store is within the basement and provides for the minimum number of spaces required as per London Plan 2021. Access to this store is also via lift and stairs.
336. The Transport Assessment notes that a range of bike tools will be available from the PBSA management staff to undertake minor repairs. Provision of a bike maintenance stand and fixed pump will be seen positively in terms of quality of cycle parking provision and Travel Plan objectives for both commercial and PBSA cycle stores. These shall be required in the Travel Plan, which would be secured via the s106.
337. A cargo bike hire scheme is proposed which would allow students to rent a cargo bike to undertake shopping and collect bulkier items. Two cargo bikes are proposed which will be managed by the management company. It is considered that this cargo bike hire is included in the Travel Plan as well as the final student management plan.
338. TfL had commented that that cycle store access should be internal, e.g., through a residential lobby to address personal safety concerns of residents being tailgated when going into the store. The applicant has confirmed that

access to the cycle store from the public realm would be during daylight hours only, with access out of daylight hours available via the reception with the side door into the cycle lift access corridor. It should also be noted that all accesses will be covered by CCTV and monitored by the 24/7 on site staff. These mitigation measures would ensure the personal safety of cycle users.

339. A contribution of £120 000 towards TfL Cycle Hire (Santander Cycles) has been requested by TfL in line with nearby developments and Policy T3, to support the likely increase in demand from the students. TfL has not been able to identify a location close to the site to provide such a docking station. They subsequently requested the contribution towards the operation of the docking station, but this would fail the tests of the CIL regulations. As such, this is not being secured in the s106. However, Southwark Plan Policy P53 does require free membership for residents to a Cycle Hire scheme for a minimum of 2 years where a docking station is located within 400m of the proposed development. This shall be provided upon first occupation of any unit or room and this will be secured in the s106 agreement.
340. The Transport planning team had requested bays for e-scooters within the site. It is feasible to have marked bays within the red line and this will be conditioned.

Transport and highways summary

341. 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

342. The applicant has submitted a Demolition and Construction Environmental Management Plan (DCEMP) 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. EPT considered the report highlights and addresses the main environmental issues that can impact existing environment during the demolition and construction process and has recommended that the applicant apply for a S61 under the Control of Pollution Act 1974 to ensure that the measures contained within the CEMP is followed.
343. TfL had raised concerns that there was no information or plans to show how deliveries on Avonmouth Street would work. TfL also commented that the Council should ensure that there are no tailbacks onto Newington Causeway, as this would disrupt bus operations. This can be mitigated by timed arrivals, so this should be a commitment in the Construction Logistics Plan (CLP). The application is accompanied by a CLP and this shows that vehicles will approach the site along Avonmouth Street and unload kerbside, adjacent to the site.

During the works any vehicles travelling to the site for deliveries will be booked in advance to ensure that no congestion occurs within the vicinity of the site. The DCEMP also shows the proposed movements for deliveries to site during construction including swept paths.

344. 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 CEMP and a CLP are to be required by S106 obligation. The applicant has also agreed to pay a sum of £25,000 to the Council's Highways Network Management to fund their work in monitoring adherence to the CEMP through the demolition and construction phases.

Flood risk, resilience and safety

345. The NPPF 2024 states that planning decisions must take into account the current and long-term implications for flood risk in order to minimise the vulnerability of communities and improve resilience. Where development is necessary in higher risk areas, development should be made safe for its lifetime without increasing flood risk elsewhere. Certain steps need to be followed when reaching a planning decision on development in higher risk areas, with risks managed through suitable adaptation measures. The advice of flood risk management authorities also needs to be taken into account.
346. Policy SI 12 of the London Plan 2021 states that development proposals should ensure that flood risk is minimised and mitigated and natural flood management methods should be employed in development proposals due to their multiple benefits including flood storage and creating recreational areas and habitat. Policy SI 13 reinforces this and states that development proposals should ensure that surface water run-off is managed as close to its source as possible. Drainage should be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality and enhanced biodiversity, urban greening, amenity and recreation. This approach is also reflected in Southwark Plan policy P68 Reducing Flood Risk.
347. The application includes a Flood Risk Assessment (FRA). The site is in Flood Zone 3 and is located within an area benefitting from flood defences. There is a basement proposed in the scheme, but this is used for cycle storage and PBSA laundry only with no sleeping accommodation. As the site is in an area of tidal residual flood risk, it would be necessary to ensure all 'More Vulnerable' (i.e. sleeping accommodation) uses are located at least 300mm above the 2100 epoch breach level of 3.30m AOD, resulting in a minimum level of 3.60m AOD. Student residential accommodation would only be located at or above the third floor level and above at a minimum level of 13.20m AOD and therefore well above the breach level. The development proposed below the 2100 epoch tidal breach level of 3.3m AOD (i.e. the basement and ground floor levels) should incorporate flood resistance and/or resilience construction methods to minimise the potential damage that could be caused by flooding. The submitted FRA notes those measures such as materials and construction methods to be used.

348. The FRA recommends that a Basement Impact Assessment (BIA) should be undertaken to further investigate the risk of groundwater flooding to the proposed development. This BIA has been submitted and confirms that the proposed development is not expected to cause significant problems to the subterranean drainage. It does, however, note that it would be prudent to confirm this by a ground investigation and subsequently updated BIA. As such, a final BIA to be submitted and approved is to be conditioned.
349. The FRA has been reviewed by the Environment Agency. No objection is raised. Whilst the EA did not suggest conditions, the GLA did raise that there is the potential for elevated groundwater beneath the site. Groundwater monitoring should be undertaken ideally during winter months to inform the exact mitigation measures required, to be secured by condition. Given that there is a condition on SUDS, there is no need for a separate condition.

Sustainable urban drainage

350. SUDS measures are incorporated through the use of green/landscaped roofs and tanked permeable paving, with circa 76m³ below ground storage required to attenuate final discharge to the sewer. The SUDs measures would offer a 93% reduction in surface water discharge to the public sewer for the 1 in 100 year (+40% climate change) event. The Flood Risk and Management Team raises no objection. It is proposed to restrict surface water flows from the development to 2l/s for storms with a 1% AEP or less severe, with an additional 40% allowance for climate change, in accordance with local and national guidance.
351. Full details of the proposed surface water drainage system incorporating SUDs will be conditioned to include detailed design, size and location of attenuation units and details of flow control measures to ensure the above runoff rates can be achieved. For these reasons, it is considered that the application meets the requirements of Southwark Plan Policies P67 and P68.

Land contamination

352. In December 2024, the applicant completed a land contamination assessment to determine whether ground conditions in the local area could pose a constraint to the proposed development. The findings of the report indicated that the site's historical uses warranted an intrusive site investigation. The presence of Made Ground and the London Clay Formation may contribute to elevated sulphate levels, which could necessitate the use of sulphate-resistant concrete in construction.
353. In response, the Council's EPT officer has recommended the inclusion of a 'Site Contamination' condition. This condition requires that an intrusive site investigation and associated risk assessment be completed prior to the commencement of any works, to ensure that any risks from land contamination to future users of the site are adequately mitigated.

Utilities

354. The submitted Utilities Report sets out the existing utilities on site (electricity, potable water, telecommunications and gas) and assesses the potential impacts of the proposed development on the wider networks, including the potential provision of additional services that may be required to deliver the proposals.
355. The report confirms that foul/ surface water sewers, gas, electric, water and assets are not present within the site bar the individual connections for the existing development. It does note that additional surveying should be carried out to locate a potential British Telecoms connection serving the adjacent unit to the south. There will be no gas connection to the proposed site. With regards to water Thames Water has not raised any objections but has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. As such they have requested a condition preventing any properties being occupied until confirmation has been provided that either all water network upgrades required to accommodate the additional flows from the development have been completed; or a housing and infrastructure phasing plan has been agreed with Thames Water.
356. UK Power Networks (UKPN) has not commented on the application, but the Utilities Report note that UKPN have confirmed capacity with a proposed Point of Connection.
357. 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.

Wind microclimate

358. 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.
359. The submitted Wind Microclimate report assesses two scenarios:
- Existing situation without soft landscaping proposals but with existing surrounding landscaping.
 - Proposed development with existing surrounds
 - Cumulative scheme with Borough Triangle in place.
360. Computational modelling (CFD) was employed. A digital model of the site and surrounds was used for the study. The surrounding area was modelled up to a distance of 450 m and all features which are likely to impact the wind flow to and through the site have been replicated. The LLDC variant of the Lawson criteria was used, which applies a single percentage probability of exceedance of a range of wind speeds related to different pedestrian uses.

361. *Proposed development with existing surrounds*

In terms of safety, wind conditions throughout the proposed development and surrounding area satisfy the pedestrian safety criteria. In terms of comfort criteria, wind conditions at entrances, thoroughfares and surrounding areas are comfortable for intended uses. It does note however, that the communal amenity terrace space is suitable for short-term sitting or better from spring to autumn and with the introduction of soft landscaping, some additional shelter will further shield the terrace from northeast and southwest, enhancing the usability of this space, in particular from late summer to early autumn.

362. *Cumulative scenario*

In the cumulative scenario (Borough Triangle in place), wind safety and comfort conditions remain materially similar to that of the proposed development within existing surrounds scenario. Wind conditions within the immediate surrounding areas would also remain suitable for pedestrian activities including walking on roads, strolling at thoroughfares and standing at entrances.

363. It is considered that further wind and microclimate mitigation measures should be explored so that the terrace area would meet the LDDC comfort rating for 'Long-sitting'. Therefore, it is considered that London Plan Policy D9 and Southwark Plan Policies P14, P17 and P56 have been met.

Air quality

364. The site is within an AQMA and an Air Quality Focus Area (AQFA).

Local monitoring data indicates that NO₂ concentrations have not exceeded the Air Quality Objective (AQO) in recent years. An Air Quality Assessment was submitted with the application, which determine baseline conditions, consider location suitability for the proposed end-use and consider potential effects because of the proposals. It also looks at the construction and operational phases of the development.

365. EPT had reviewed the report and support the suggested control measures some of which will be incorporated within the CEMP. EPT noted that the development is likely to have mechanical ventilation to help address the noise climate which can also contribute to the indoor air pollution depending on any filters used in the system. The predicted background concentrations of NO₂ and PM₁₀ are below the relevant AQO.

366. Impacts from operation phase are mainly from road traffic emissions and are considered not significant, and future residents at the development site are considered unlikely to be exposed to pollution concentrations above AQOs. An emergency generator is proposed and this will not operate for more than 50 hours for testing per year. The location of the flues would need to be finalised and a condition will secure further details to ensure that this is suitably away from sensitive receptors (both proposed and existing) and details of the testing regime should be provided.

367. The GLA had originally commented that additional clarification was required on the air quality assessment and for the proposal to demonstrate the scheme would be air quality neutral. Following correspondence and a revised air quality assessment, it is considered that these minor matters could be addressed prior to GLA Stage 2 referral.

Agent of change

368. 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.
369. The area surrounding the site is currently a mix of commercial uses, cultural, retail and residential uses. The site is located within a Town Centre where it is anticipated that a variety of commercial and residential uses will co-exist. The nearby properties that are established noise generating uses includes:
- The Ministry of Sound to the west on Gaunt Street – Nightclub
 - Mercato Metropolitano opposite on Newington Causeway
 - Railway arches to the south-west on Newington Court– a mix of Class E, B2 and B8 uses
 - Railway line to the south-west.
370. The introduction of residential would be a sensitive use, however it should be noted that the consented Borough Triangle scheme would be the closest residential use to the above premises. That consented scheme proved to be acceptable with mitigation measures in relation to the agent of change. The relationship of this proposed development with the noise and vibration from the railway viaduct, the background noise from Mercato and Ministry of Sound is considered in the residential quality section of this report. The railway arches would be screened mainly by the Borough Triangle scheme and is some distance from the development site.
371. The Southwark Playhouse is located to the south of the site, but is separated by two buildings and as such their operation is unlikely to be impacted.
372. In terms of dust or air emissions, there are no uses surrounding the site that would have an impact on the proposed student accommodation. Local monitoring results and predicted background pollution concentrations suggest that air quality is likely to continue to improve. The businesses along Newington Court (the railway arches) are of such distance that their ongoing operation of the businesses located within the railway arches would not be expected to have additional emissions limits imposed due to the introduction of this scheme. In summary, the development would comply with Policy D13.

Energy and sustainability

373. Chapter 9 of the London Plan deals with all aspects of sustainable infrastructure and identifies the reduction of carbon emissions as a key priority. Policy SI2 requires all developments to be net zero carbon with a minimum onsite reduction of 35% for both commercial and residential. Non-residential development should achieve 15 per cent reduction through energy efficiency measures.
374. Southwark Plan Policies P69 and P70 reflect the approach of the London Plan by seeking to ensure that all developments are net zero carbon with a 100% on-site reduction against the Part L 2013 baseline (now updated to 2021 baseline). Non-residential developments must achieve a minimum 40% onsite reduction, achieve a BREEAM rating of 'Excellent' and include measures to reduce the effects of overheating using the cooling hierarchy. Where a development cannot reduce its operational carbon emissions to zero, any residual carbon emissions must be offset to meet the net zero target. Offsetting is achieved by way of a financial contribution towards the 'Green Buildings Fund', Southwark's Carbon Offset Fund, for the total residual emissions of the development.

Energy and carbon emission reduction

375. An Energy Strategy was submitted and subsequently amended (April 2025 and September 2025), demonstrating compliance with the Mayor of London's energy hierarchy: Be Lean, Be Clean, Be Green, Be Seen. The strategy incorporates passive design measures, energy-efficient systems, and on-site renewable energy technologies. Carbon emissions have been assessed against a baseline scenario, based on the notional building defined in the 2021 Building Regulations.
376. London Plan Policy S12 requires major developments to achieve a minimum on-site carbon reduction of 35% beyond the Building Regulations. Within this, residential elements must deliver at least 10%, and non-residential elements at least 15% of the reduction through energy efficiency measures.
377. In addition, Policy P70 of the Southwark Plan stipulates that major non-residential developments must achieve a minimum 40% on-site carbon reduction against the 2013 Building Regulations baseline. Where these targets are not fully met on-site, the remaining carbon shortfall must be addressed through off-site measures or a financial contribution, secured via planning obligations.

Be Lean

378. Under the 'Be Lean' tier of the energy hierarchy, developments are required to reduce energy demand through passive design and energy efficiency measures that enhance overall performance.

The applicant has identified a range of passive design strategies incorporated into the scheme. These include enhanced insulation to walls, roofs, and floors;

high-performance glazing; improved airtightness; and the use of natural ventilation and passive cooling. Additional measures include a carefully considered daylighting and glazing strategy to optimise natural light while minimising solar heat gains.

379. The commercial part of the development demonstrates a 24.1% and student accommodation achieves 25.4% reduction in CO₂ emissions over the baseline at the Be Lean stage over the Part L 2021. This represents a total saving of 25.3%, which is compliant with planning policies.

Be Clean

380. London Plan Policy SI 3, Part D, sets out that major development proposals within Heat Network Priority Areas should have a communal low-temperature heating system. Southwark Plan Policy P70, Part 7, sets out that major development must be designed to incorporate decentralised energy in accordance with the following hierarchy outlined below:
1. Connect to an existing or planned decentralised energy network; then
 2. Be future-proofed to connect to a planned decentralised energy network; or
 3. Implement a site-wide low carbon communal heating system; and
 4. Explore and evaluate the potential to oversize the communal heating system for connection and supply to adjacent sites and, where feasible be implemented.
381. The applicant has been exploring the potential to connect to the Heygate Energy Centre, a local heat network located approximately 530 metres from the proposed development. However, at this stage, the development is pursuing an individual energy strategy. It will be served by a centralised energy centre that will provide heat and hot water throughout the site. As such, connection to a district heat network is not currently proposed. Nevertheless, the development will be designed to safeguard the potential for a future connection, should it become viable.
382. A S106 obligation has been agreed with the applicant to secure a DHN Energy Strategy to demonstrate how the development will be designed and built so that all parts of it will be capable of connecting to any future DHN. This meets the requirements of Policy SI 3 of the London Plan.

Be Green

383. Under the 'Be Green' tier of the energy hierarchy, developments are expected to maximise the use of renewable energy by generating, storing, and utilising it on-site. In line with this requirement, the applicant has proposed the following low-carbon technologies:
- Air Source Heat Pumps (ASHPs) for space heating and domestic hot water
 - Photovoltaic (PV) panels installed at roof level across the development
384. The proposed measures would result in a carbon reduction of 12.7% for the student accommodation and 3.9% for the commercial element of the scheme.

This leads to a total on-site carbon saving of 37.2%, with the student accommodation reaching 38.2% and the commercial element 28%, which exceed the baseline requirements and contribute to achieving the necessary carbon savings.

Be Seen

385. Introduced through the London Plan 2021, the 'Be Seen' policy requires developments to predict, monitor, verify, and improve their operational energy performance. In accordance with this requirement, the applicant has submitted the GLA's 'Be Seen' reporting spreadsheet as part of the application and has updated it in response to feedback from the GLA.
386. The development's energy performance would be monitored, verified and reported on through to post construction in accordance with the GLA's Be Seen Monitoring platform. This monitoring would be secured through the S106 agreement.

Summary

387. At the Be Lean stage, the student accommodation achieves a 25.4% reduction in CO₂ emissions, while the commercial element achieves 24.1%, both exceeding the minimum energy efficiency thresholds set by the London Plan.
388. Following the Be Green stage, the development achieves a total on-site carbon saving of 37.2%, with the student accommodation reaching 38.2% and the commercial element 28%. These figures demonstrate compliance with the overall London Plan target but fall short of the more stringent requirements set out in the Southwark Plan for both residential and non-residential elements. In accordance with Policy P70, the remaining carbon shortfall required to meet net zero will be addressed through a carbon offset payment, calculated based on the residual annual emissions over a 30-year period. This is based on £95 per tonne of carbon x Total Carbon shortfall x 30 years (S106 and Community Infrastructure Levy 2025). The residual emissions are 21.07 tCO₂/yr. The carbon offset contribution is being calculated by 21.07 tCO₂/yr x 30 yrs x 95£/tCO₂ = £60,049.50 which will be secured via a planning obligation within the S106.

Whole life cycle and carbon capture

389. London Plan Policy SI 2, Part F, states that "*Development proposals referable to the Mayor should calculate whole life cycle carbon emissions through a nationally recognised whole life-cycle carbon assessment and demonstrate actions taken to reduce life-cycle carbon emissions*". Whole life cycle carbon (WLC) assessment assesses the embodied and operational emissions associated with redevelopment. Policy P70 reinforces the need to calculate whole life cycle carbon emissions through a nationally recognised assessment and demonstrate the actions taken to reduce life cycle carbon emissions. WLC assessments are monitored at the pre-application, submission and post-construction stages. The submitted whole life assessment for the planning application evaluates both the operational and embodied carbon of the proposed throughout its life cycle, including construction, use and deconstruction.

390. The GLA had initially queried the WLC calculations, but following the applicant's clarifications, the GLA was satisfied with that approach. The WLC emissions fall below the GLA limit and are approaching aspirational benchmarks. This is notable given the development involves complete demolition and a new build. The primary driver of these reductions is the specification of a concrete mix with a high proportion of cement replacement. It is anticipated that WLC emissions may increase at the detailed design stage as more specific information becomes available. Therefore, this initial assessment will serve as the foundation for a more comprehensive evaluation at both the detailed design and post-construction stages.
391. To ensure accountability, a planning condition has been recommended requiring the applicant to submit a post-construction WLC assessment, reporting the actual carbon emissions associated with the completed development.

Circular Economy

392. London Plan Policy SI 7 part B states that *"Referable applications should promote circular economy outcomes and aim to be net zero-waste."* In addition, Southwark Plan Policy P62 states that a Circular Economy Statement should accompany planning applications referable to the Mayor.
393. The applicant has submitted a comprehensive Circular Economy Statement in line with the guidance outlined in "London Plan Guidance: Circular Economy Statements" document. This demonstrates compliance with key targets, including diverting a minimum of 95% of construction waste from landfill through reuse, recycling, or recovery. The applicant also meets the benchmark for beneficial reuse and is on track to achieve a minimum recycling rate of 65% by 2030.
394. In addition, the applicant is exceeding the target for recycled or reused content in building materials, aiming for 25%, above the minimum requirement of 20%. This is being achieved through several measures, including the use of at least 95% recycled steel in reinforcement bars, the specification of highly recycled steel for other structural applications, and the incorporation of concrete mixes with high levels of cement replacement. A recalculation will be undertaken at that stage to confirm the final percentage of recycled content.
395. The proposed development will use a cast in situ RC frame and brick façade which are both durable materials. With regular maintenance, the structure is expected to remain functional beyond its 60-year design life. The potential for reuse and refurbishment of the superstructure should be considered in the final design. The applicant must address this in the post-construction Circular Economy statement and this will be secured in a condition. 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-construction.

Overheating and cooling

396. London Plan Policy SI4 and Policy P69 of the Southwark Plan set out the cooling hierarchy that is required to be followed when developing a cooling strategy for new buildings. The six-step hierarchy is as follows:

- I. Minimise internal heat generation through energy efficient design; then
- II. Reduce the amount of heat entering the building through the orientation, shading, albedo, fenestration, insulation and green roofs and walls; then
- III. Manage the heat within the building through exposed internal thermal mass and high ceilings; then
- IV. Use passive ventilation; then
- V. Use mechanical ventilation; then
- VI. Use active cooling systems (ensuring they are the lowest carbon options).

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

Minimise internal heat generation

397. Highly efficient LED lighting will be required as part of the energy strategy, which minimises internal heat generation.

Reduce heat entering the building

398. The development is surrounded by several buildings that will provide shading to the lower floors. It also incorporates shading features such as opaque openable panels in each room and external horizontal and vertical slats on the north-east, south-west, and north-west façades. Additionally, the use of glazing with a reduced g-value will help limit solar gains, while highly insulated walls will minimise heat transfer through conduction.

Manage the heat within the building

399. The development is expected to feature a reinforced concrete frame with a traditional brick outer leaf for most external walls offering substantial thermal mass, providing a damping effect that helps buffer the building from extreme external temperatures.

Use passive ventilation

400. All occupied rooms feature openable opaque panels that support natural ventilation. However, occupants may close these panels when internal noise levels exceed limits. The acoustic study indicates that the overheating strategy must remain effective even when windows are closed during noise-sensitive periods. Passive ventilation will still be possible during quieter times or when rooms are unoccupied. Upper-floor units, more prone to overheating, are less affected by road noise, making occupants more likely to keep windows open. In contrast, lower-floor units, closer to noise sources, are less susceptible to overheating due to reduced solar gain. The GLA had commented that further passive measures should be adopted to achieve 100% without the requirement of peak lopping. This could include shading, balconies, overhangs, recessed

openings etc. Nevertheless, due to the design of the building (no balconies proposed), this would not be possible.

Use mechanical ventilation

401. The development includes mechanical ventilation with heat recovery (MVHR) systems to provide continuous background ventilation, ensuring airflow even when windows remain closed. This also enables ventilation in rooms without external windows, such as bathrooms.

Use active cooling systems (low carbon)

402. The building incorporates a tempered air system to mitigate overheating given that the openable panels may need to remain closed (during sleeping hours) due to noise levels. This would ensure comfortable internal conditions for occupants at all times.

Summary

403. The development has adhered to the cooling hierarchy and aimed to minimize the use of energy-intensive cooling systems. The energy demands of the proposed cooling measures have been incorporated into the energy assessment, with the resulting carbon emissions summarized above. Subject to the proposed conditions and obligations related to the energy aspects, the issue of overheating would be adequately addressed.

BREEAM

404. In line with Southwark Plan Policy P69, non-residential developments are required to achieve a BREEAM rating of 'Excellent' (minimum 70%). As the PBSA floorspace is classified as non-residential, it is subject to this requirement. A BREEAM Pre-Assessment has been undertaken for the multi-residential PBSA element, indicating a provisional score of 77%. A planning condition is recommended to secure this commitment.

Communications and aviation

Digital connectivity infrastructure

405. 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.
406. London Plan policy SI6 on digital connectivity infrastructure requires the provision of sufficient ducting for full fibre connectivity to all end users in new developments. Southwark Plan policy P44 requires delivery of fibre to the premises broadband or equivalent technology for future occupants and users. The applicant has confirmed provision for full fibre connectivity to ensure all the end users can benefit. A condition is attached to ensure that the building has fibre connection.

Television, radio and telecommunications networks

407. 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”*.
408. Proposed buildings that are tall and/or broad, and in particular this proposal have the potential to reduce coverage of mobile phone networks. Arqiva has confirmed no objection and therefore no harmful impacts are anticipated.

CCTV

409. The council's CCTV department has assessed the application and the scheme may compromise CCTV in the vicinity. However, this could be mitigated by the requirement to have a point of presence on roof space on the development for CCTV radio transmission kit. They would also require a portion of roof space which the applicant has agreed to be provided. An existing camera would also need to be relocated to alternative locations on Newington Causeway and that would cost £15,000. With this addressed through the s106 agreement, this would have an acceptable impact.
410. With an increase of residential dwellings 243 student bedrooms; and flexible commercial, business, floorspace footfall in the public realm, camera coverage will need to be increased in Avonmouth Street and Tiverton Street in the interest of public safety. A total of one new camera is sought and this contribution of £17,300 would be secured via a S106 agreement.

Aviation

411. 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.
412. No consultation response has been received from the Civil Aviation Authority. However, the National Air Traffic Safeguarding raised no objections. Given the height of this proposal relative to nearby tall building at Borough Triangle, it is reasonable to conclude that the proposed tall building would not cause any harmful aviation impacts.

Health impacts

413. The application was accompanied by a Health Baseline Assessment Note. This baseline assessment sets out the demographic, deprivation, health and social infrastructure profiles to understand the current health conditions in the study area (Southwark) compared with the wider area (London Borough of Southwark) where appropriate. It would then provide an understanding around the potential for health impacts arising from the development in the area closest to the site.

414. The assessment note outlines the wide range of social infrastructure and open space within an accessible walking distance from the site. Given that the scheme is for student accommodation, it looked at existing further education as opposed to primary and secondary school provision. The provision of student accommodation close to colleges and universities is a benefit. The effect on primary and secondary education provision is therefore negligible. The Health assessment note also concludes other positive aspects of the development including provision of student housing to meet the need and job creation with an improved workspace environment.
415. Within a 20 minute walk of the site (1.6km), there are five GP practices. The closest GP practice to the site (Falmouth Road Surgery – 0.5km away) is currently accepting new patients and has a GP: patient ratio of 1:3,190, which is higher than the recommended ratio of 1:1,800. The other nearby GP surgeries are also above the ratio. The additional residents to reside at the completed development has the potential to place additional demand upon the local health facilities. Nevertheless, it points out that students often prefer to register with university medical services or continue to use their existing home GP practice.
416. A response was received from the NHS, prepared by the Healthy Urban Development Unit (HUDU). The response highlighted that a large influx of students into the area will have an impact on health infrastructure which should be a consideration. The age profile of an area will likely alter with most students being aged between 18 and 22 which have different health demands to that of the broad population. The response also emphasised that to meet the health needs of the new residents of the proposed schemes, and to limit adverse impacts on existing residents, developments need to provide financial contributions for the expansion of health infrastructure serving the locality. They note that additional funding will be required for the eventual fit out of the Elephant and Castle health hub.
417. The NHS requested a capital cost of mitigation of £24,000 for primary care services via a S106 contribution. The council's adopted s106 SPD does not require contributions for NHS services as these are assumed to be delivered from the council strategic CIL funds. Consequently, the significant CIL receipts from this development would contribute to funding either the Health Hub or other initiatives and the use of CIL is the correct mechanism in this case. It is also anticipated that other residential schemes will make CIL contributions to contribute towards increased capacity to deal with the demand for primary healthcare. Assuming mitigation is secured through CIL contributions the cumulative effect on primary healthcare is not expected to be significant.
418. The proposed development has considered ways to encourage active lifestyles by promoting cycling and walking using a variety of measures, emphasised through the design and layout. The site is also located in proximity to a number of public transport links.

Planning obligations

419. IP Policy 3 of the Southwark Plan and Policy DF1 of the London Plan advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. IP Policy 3 of the Southwark Plan is reinforced by the Section 106 and CIL SPD 2025, which sets out in detail the type of development that qualifies for planning obligations. The NPPF emphasises the Community Infrastructure Levy Regulation 122 which requires obligations be:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development

420. The following obligations are required to make the development acceptable and to mitigate the impacts of the proposal. The applicant has agreed to all of these obligations:

421. Planning Obligation	Mitigation	Applicant Position
Archaeology		
Archaeology	Contribution towards cost of providing technical archaeological support £8,635.	Agreed
Housing		
Affordable Housing	Affordable Housing Contribution: minimum £11,056,500 Payment-in-Lieu	Agreed
Wheelchair units	Secure 5% wheelchair studios for the PBSA Not to occupy the development until the Blue Badge Parking Space has been constructed and laid out in accordance with good practice guidance and be provided with fully connected and operational electric or hybrid vehicle charging points.	
Student accommodation	Submission of Student management plan and should include details around cargo bike hire. Submission of an agreement to show that commercial provider of refuse/recycling	Agreed

	<p>collection services for both the PBSA and commercial uses for the lifetime of the development is secured.</p> <p>The PBSA must be managed by a single PBSA Operator.</p> <p>The PBSA shall be retained as a PBSA product which cannot be sold off as individual units, nor at any time be used as self-contained accommodation (hotel, aparthotel, hostel or similar). It shall also not contain any other use other than for PBSA when not occupied.</p> <p>All communal amenity facilities (internal and external) within the PBSA as approved shall be retained for the lifetime of the development and shall not be used for any purpose other than free-to-access communal amenity space for all PBSA residents.</p> <p>Stipulate single room occupancy only.</p>	
Local Economy and jobs		
Affordable workspace	<p>10% of the proposed gross new employment floor space as affordable workspace on site. The affordable workspace should be secured for at least 30 years.</p> <p>This shall be a maximum of £40 per sqft inclusive of service charge.</p> <p>Submit an Affordable Workspace Strategy for approval. An Annual Affordable Workspace Strategy Monitoring Report must be submitted on or immediately before 1 year of first occupation and each subsequent year for the whole term of the lease.</p>	Agreed

Loss of office floorspace	Financial contribution of £21,706 to support a range of employment and skills programmes for Southwark residents.	Agreed
Construction phase jobs and training	<p>To require the submission of an employment, skills and business support plan to detail the methodology, targets, mechanism and local supply chain activity .</p> <p>This development must deliver:</p> <ul style="list-style-type: none"> - 19 sustained jobs to unemployed Southwark residents - 19 short courses - 4 construction industry apprentices during the construction phase. <p>Or meet the Employment and Training Contribution which is £116,300.</p>	Agreed
Local Procurement	<p>Developers should use reasonable endeavours to procure from businesses and organisations based in Southwark either:</p> <ul style="list-style-type: none"> • 10% of the total value of the construction contracts or, • 10% of the total number of construction contracts tendered in relation to the development. 	Agreed
Employment monitoring	Monitoring fee of £3,710 for the Employment and Skills Methodology and/or Affordable Workspace Strategy.	Agreed
Business relocation	Submit a Business relocation strategy to demonstrate and support for the DWP to find alternative suitable location in the local area.	Agreed
Landscape and open space		
Public realm	Prior to occupation of the PBSA, the public realm shall be completed and made available for use.	Agreed

	<p>Submission of public realm specifications for approval by the council.</p> <p>Provision of public access to the public realm 24 hours, 365 days of the year. Limited closures to the public (not exceeding two days in any calendar year).</p> <p>On-going management and maintenance obligations.</p>	
Trees	Contribution of £56,000 to improve borough tree planting.	Agreed
Biodiversity net gain	<p>A monitoring fee of £12,874 to cover the cost of periodic monitoring over 30 years.</p> <p>A Habitat and Management and Monitoring Plan will be required post-approval to set out the management arrangements.</p>	Agreed
Design		
Architect design team	Securing of ACA Studios Architects to deliver detailed design unless otherwise agreed in writing.	Agreed
Energy		
Carbon offset payment and energy	<p>Require a feasibility study for its connection to the district heating network.</p> <p>Carbon Offset Contribution of £60,049.50 before implementation or such recalculated sum at a price of £95 per tonne of carbon in the event that a revised Energy Statement is submitted prior to Implementation.</p>	Agreed
Be Seen monitoring	Post-construction monitoring and reporting of each block.	Agreed
Highway works and transport contributions		

CPZ Permit	CPZ parking permit restriction for residential units and commercial floorspace (unless a blue badge holder).	Agreed
TfL Cycle hire	To provide annual membership to the cycle hire scheme for every residential unit for 2 years from first occupation of that unit.	Agreed
Public Transport Infrastructure Contribution	Bus and Cycle Route Improvement Contribution (Newington Causeway Improvement Scheme, £250,000)	Agreed
Delivery and servicing plan, monitoring and bond	<p>Delivery and servicing plan – to submit delivery and servicing plan prior to occupation, to secure a monitoring plan, monitoring fee of £2,790, and comply with that for the monitoring period, to pay the cash deposit (£2,790) that the council can retain if the monitoring is not undertaken or the number of vehicles exceeds the baseline figure after an initial warning.</p> <p>Not to occupy more than 75% of the GIA of the development until the Delivery and Servicing Monitoring Plan has been submitted to the Council and the Council has approved the plan.</p> <p>Irrespective of whether the development meets or fails to meet is baseline target, the Council will retain the monitoring fee.</p>	Agreed
Travel Plan	Monitoring fee of £2,790 for the Travel Plan.	Agreed
Demolition and construction management plan	<p>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.</p> <p>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. The CEMP shall include a Construction Logistics Plan.</p>	Agreed

	<p>The applicant has also agreed to pay a sum of £25,000 to the Council's Highways Network Management to fund their work in monitoring adherence to the CEMP through the demolition and construction phases.</p>	
S278 Highway works	<ol style="list-style-type: none"> 1. Repaving the footway fronting the Development including new kerbing on Newington Causeway and Avonmouth Street in line with SSDM standards; (granite natural stone paving slabs and 300mm wide granite kerbs) 2. Reconstruction vehicle crossover on Avonmouth Street to current SSDM standards 3. Repairing any damage to the highway due to construction activities for the Development including construction work and the movement of construction vehicles. 4. Provision of dropped kerb on Avonmouth Street. 5. Provision of visitor cycle spaces on Newington Causeway with location to be confirmed. <p>The applicant is to note that surface water from private areas is not permitted to flow onto public highway in accordance with Section 163 of the Highways Act 1980. Detailed drawings should be submitted as part of the s278 application confirming this requirement.</p>	Agreed
CCTV	<p>The requirement to have agreement for a point of presence on roof space on the development for CCTV radio transmission.</p> <p>Contribution of £17,300 towards installation of one new CCTV camera. Contribution towards recording per camera (pro rata £650 per camera per annum).</p>	Agreed

	Contribution of £15,000 towards relocation of one existing CCTV camera on Newington Causeway.	
	7% consultant fee added for the redesign and project management of all works carried out.	
Administration		
Monitoring fee	Administration fee of £15,000 to cover costs of monitoring the obligations.	Agreed
Specialist technical fee	Specialist technical support fees in accordance with the s106 and CIL SPD	Agreed

422. In the event that an agreement has not been completed by 30th April 2026, the committee is asked to authorise the director of planning 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 mitigate against the adverse impacts of the development through contributions and it would therefore be contrary to IP Policy 3 Community infrastructure levy (CIL) and Section 106 planning obligations of the Southwark Plan 2022; and Policy DF1 Delivery of the Plan and Planning Obligations of the London Plan 2021; and the Southwark Section 106 Planning Obligations and Community Infrastructure Levy SPD 2015.”

Mayoral and Borough Community Infrastructure Levies

423. 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.
424. The site is located within Southwark CIL Zone 2 and MCIL2 Band 2 Zone. Based on the GIA obtained from CIL Form 1 dated 06 Dec 2024 and General Arrangement Gross Internal Arrangement Document dated 26 Nov 2024, the gross amount of CIL is £1,639,628.49. MCIL2 amount is £521,949.45 and SCIL is £1,117,679.04. It should be noted that this is an estimate, floor areas will be measured and checked when related CIL Assumption of Liability is submitted after planning approval has been secured.
425. It should be noted that as all 243 PBSA bedspaces are direct-let, the higher borough student CIL rate of £109 per square metre (plus 2024 indexation) has

been applied for this CIL estimate. As the proposed commercial space is intended for a range of different Class E users, the retail rate of £136/sqm, which is the highest for SCIL, has been applied to account for the flexibility in uses.

Community involvement and engagement

426. The applicant provided a Statement of Community Involvement to explain the ways in which the applicant has engaged with the community and stakeholders ahead of submitting this application.
427. Prior to the submission of this current application, the applicant had carried out pre-application consultation exercises with key stakeholders and residents. In summary, the document confirms that from October 2024 to November 2024, they carried the following:
- one-to-one meetings with key stakeholders to explain the proposals and to receive feedback. Four meetings were arranged with locally elected politicians and the local community (including webinars);
 - Undertaking direct resident/business engagement with those properties closest to the site both to receive feedback and remind them of upcoming consultation events. Principal properties visited were those on Avonmouth Street, Tiverton Street and Newington Causeway, including Telford and Stephenson House. Approximately 110 properties were visited and 10 residents were engaged with.
 - Holding a public exhibition to give people the opportunity to view the plans and discuss the proposals with the applicant and project team. The exhibition was publicised through the sending of individual letters to 933 local residents and businesses sent out on 30th October 2024. In total, 10 people attended the public exhibition. A feedback form containing a questionnaire and comment space was provided to attendees.
 - Hosting a website to provide stakeholders with information on the applicant's development plans. 795 users have visited the website since launch and at the time of the application being submitted.
 - Hosting webinars to provide stakeholders with information on the applicant's development plans and answer questions. One person attended the webinar.
428. The key themes raised during the community engagement exercise (feedback survey and verbally) are summarised below.
- Job Centre: Questions were asked about the future of the Job Centre.
 - Overshadowing: Questions were asked about the impacts of overshadowing on Newington Gardens and parts of the Rockingham Estate.
 - Newington Gardens: Questions were asked about the impact of the development on Newington Gardens in terms of increased footfall and the possibility of improving the children's playground there.
 - Affordable housing: Queries were raised about the feasibility of delivering on-site affordable housing within the development.
 - Student housing: general concern about the number of student housing schemes coming forward.

- Cycle parking: It was hoped that the development would provide an adequate amount of on-site cycle parking.
429. As well as the public consultation events, the applicant engaged in the pre-application advice service with officers. The scheme has evolved and been further refined in consultation with planning officers and key stakeholders. The applicant also engaged in the GLA's pre-application process and presented the scheme to the council's Design Review Panel.
430. It is considered that the applicant has sought to actively engage with the local community throughout the process so far and they have stated a commitment to continue engagement beyond the planning stage.

Council's consultation and engagement

431. The council, as part of its statutory requirements, sent letters to surrounding residents, advertised the application in the press and displayed notices in the vicinity of the site. At the time of writing, a total of 9 objections, 2 support and 1 neutral comment had been received.
432. **Comments of Support:**

- Appropriate scale, height, massing
- Contributes positively to surroundings
- Contributes to regeneration

Comments of Objection:

The objections received from the public raised the following summarised topics in the objection comments.

Transport and Parking:

- Inadequate public transport provisions, as it does not sufficiently account for the increased demand on local public transport services
- Inadequate access for pedestrians, cyclists and vehicles
- Increase in traffic
- Inadequate parking provision

Design Impacts:

- Development is excessively tall
- The scale, design, and use of the development are seen as incompatible with the character of the surrounding area
- The design of the ground floor lacks architectural interest that encourage public interaction or active street frontage
- The south west flank windows proposed would compromise the future development of the adjoining site and should be removed

Principle of Development:

- With at least three other student housing developments under construction nearby (Avonmouth Road, Newington Road/Harper Road, and Rockingham Street), residents feel the area is becoming saturated with student accommodation

- The development should provide conventional housing and affordable housing
- There is concern that the developer is opting to pay CIL instead of providing affordable housing
- The developers have previously used tactics to circumvent affordable housing requirements, as seen with the Avonmouth House application
- There is no need for offices in this location

Public Realm:

- The proposed green space is minimal and poorly designed, consisting of a few trees and limited seating

Residential Amenity:

- The height and massing of the proposed buildings are considered excessive, leading to overshadowing of nearby homes and green spaces such as Trinity Square and Newington Gardens
- It would directly impede and be an infringement of their "Right to Light" and also significant loss of daylight and sunlight
- Residential Design Standards seek a separation of 21 metres and so is adverse to policy, some residents live 4.5m from the boundary
- The height of the buildings will lead to overlooking and loss of privacy for neighbouring properties
- The design of the towers (with the approved Avonmouth House) may amplify noise, creating a stadium-like effect
- The high number of students is expected to lead to frequent food deliveries, increased litter, and groups gathering near residential windows
- The scale of the development may create wind tunnels
- Proposed tree planting is too close to buildings may cause long-term structural damage due to root growth
- The omission of two windows from the daylight and sunlight assessment on a neighbouring property raises doubts about the accuracy of the report

Infrastructure and Services:

- Local amenities such as GP surgeries, schools, and libraries are already under pressure and may not cope with the additional demand.
- The scale of the development will require substantial demand on energy, water and sewage
- There is no health hub proposed

Consultation:

- Residents feel they were not properly informed or involved in the planning process

Construction:

- Given the scale of the development, residents anticipate prolonged noise, dust, and disruption

433. Local groups and businesses

A letter of support has been received from the University of the Arts London:

The proposed cluster flat arrangement with dedicated on-site amenities facilitates student interaction and collaborative working in a social setting which is encouraged. The proposal will benefit both the Higher Education sector and the local community. UAL have ambitious growth targets of 25,000 students by 2030 which means that it urgently needs to secure PBSA beds to support our economic growth ambitions.

Consultation responses from external consultees

434. Argiva – No objections.
435. Conservation Area Advisory Group (CAAG) - The panel had a number of significant concerns about this proposed 19 storey development which is sited close to the listed Inner London Sessions Court building and close to the end of a rather random street frontage of generally around 4/5 storey buildings of varying age and character and with little active frontage. It did not think the present building had great merit architecturally but were concerned at the sustainability implications of demolition of a far from old building that appeared to have a considerable amount of useful life in it.
436. The building appears not to be visible from the Trinity Square Conservation Area. However, it will clearly impact on the Grade II listed court building just to the north. It seemed that the consented Avonmouth House development adjoining the site has already been allowed to do this, and that, if permitted, the impact of the two currently proposed bulky c.40 storey Borough Triangle towers would be much greater.
437. The proposals are for a scheme that will activate the frontage to the main road and this was welcomed, however the panel was not comfortable that the proposed tower could form part of a satisfactory new terrace and streetscape of high buildings, possibly increasing further in height towards Elephant and Castle.
438. The panel suggested that, if the principle of a tall building here is accepted, a better way to achieve the designers aims would be to set the upper parts of the building back on a plinth formed by the lower commercial use floors and the rest of the existing terrace parts, with the remainder of it rising from this and perhaps setting back further where a second band across the building's elevation is proposed.
439. **Officer response:** These have been discussed in the design section of the report. Whilst officers note the concerns raised, the site is in a site allocation where tall buildings are expected for significant delivery of housing and employment uses.
440. Environment Agency - The inclusion of inappropriate development according to Annex 3: Flood risk vulnerability classification of the National Planning Practice Guidance, the absence of a Flood Risk Assessment (FRA) or the submission of an inadequate FRA could technically be reasons for refusal of the scheme. However, the EA are taking a pragmatic approach and do not object to this application.

Officer response: The above is noted.

441. Great London Authority (GLA) –

Principle of development:

The proposed provision of student accommodation would contribute positively to the London Plan housing targets. GLA officers support the principle of PBSA use in this location in strategic planning terms. In line with London Plan Policy H15 it is important that use of the accommodation would be appropriately secured for students. The provision of 1,500 sqm of commercial floorspace is therefore supported. A PBSA-led mixed-use scheme that would contribute to the regeneration of the town centre. The application has identified potential employment opportunities from the proposed development and the Council is encouraged to secure local employment/training provision via the S106 agreement.

442. Equality:

The EQIA has considered potential socio-economic impacts on site users and it is noted that additional journeys on public transport and/or via private vehicle may incur additional costs for claimants. Nonetheless, any public transport journey with a Jobcentre Plus Travel Discount would remain a flat fare, meaning any additional costs arising from travelling longer distances would be mitigated and no impacts were noted for the surrounding community.

Considering the benefits of the development, together with the mitigation measures secured to limit the extent of the negative impacts on people sharing protected characteristics and/or multiple protected characteristic, GLA officers consider the proposed positive impacts and benefits of the scheme as a whole.

Having regard to the equalities impact assessment and economic benefits note submitted by the applicant, there is no strategic objection to the proposed net reduction in office space at this site.

443. Affordable housing:

At this stage the offer comprises a contribution of £500,000. The scheme must follow the Viability Tested Route and GLA officers are robustly scrutinising the applicant's financial viability assessment to ensure the maximum viable amount of affordable housing is provided. Review mechanisms should also be secured as appropriate.

Officer response: The offer has since been increased.

444. Urban Design:

- The proposed site layout and entrances are logical, with active frontages supported. The student entrance on Newington Causeway and public space enhancements are welcomed. The design maximizes distance from Avonmouth House, with secure, overlooked access to the bin store. Lighting in the narrow alleyway is required. Removal of the second basement level is supported. The main entrance is clearly defined, and the

public realm includes quality materials and landscaping. Further reduction of vehicle space to enhance pedestrian experience would be beneficial.

- The height and form are appropriate for the emerging Opportunity Area context. The townscape views in the HTVIA do not raise strategic concerns, apart from Trinity Church Square, the proposal becomes clearly visible in View D.
- GLA supports the building's design, highlighting its street frontage, well-articulated flank walls, and visually interesting rear.
- The fire safety assessment includes safe evacuation for all users and confirms that buildings over 18 metres will have a second staircase and two residential cores. Measures are to be secured by appropriate conditions.
- The Council must secure M4(2) and M4(3) requirements along with a further 5% of student bedrooms as wheelchair adaptable rooms by condition as part of any permission.

Office response: The above condition is noted.

445. Heritage and views:

- Views 11, 12, 13, and Appendix 2 (Views A–E) and Appendix 3 show the impact on Trinity Square Conservation Area and its listed buildings, including the houses and Henry Wood Hall. The building is minimally visible in View A, slightly more in Views B and C, and clearly visible in View D. In the cumulative scenario, it causes a very low level of less than substantial harm by rising above the rooflines, disrupting the silhouette of the houses and diminishing the visual prominence of Henry Wood Hall.
- Public benefits (student accommodation, an affordable housing contribution and providing jobs/skills training for local residents) outweigh the less than substantial harm to heritage.

446. Transport:

- A number of transport matters have been outlined.

Officer response: The comments are a repeat of TfL's comments and this discussed under TfL section.

447. Environment and sustainable infrastructure,

- Outstanding policy requirements: Be Lean: further evidencing/explanation/exploration of energy efficiency measures for the non-domestic element. Be Clean: demonstration that the number of energy centres has been minimised. Be Green: demonstration that renewable energy has been maximised, including roof layouts showing the extent of PV provision and details of the proposed air source heat pumps. Be Seen: confirmation of compliance with this element of policy, with compliance to be secured within the S106 agreement. Energy infrastructure: further details on the design of district heating network connection is required, and the future connection to this network must be secured by condition or obligation. Managing heat risk: further details to demonstrate the cooling hierarchy has been followed.

- The WLC assessment does not meet London Plan Policy SI2. Further details are needed on the review confirming 95% cost coverage per element, justification for benchmark alignment, consideration of retaining existing structures, material quantities and types, maintenance assumptions, and estimated reusable/recyclable material mass. A condition should also require a post-construction WLC assessment, using the GLA's template.
- The Circular Economy Statement does not comply with London Plan Policy SI7. Further details are needed. A revised statement should be submitted at the Mayor's decision stage, and a condition secured requiring a post-construction report.
- The UGF score of 0.34 falls short of the 0.4 target and requires further exploration. BNG is policy compliant and should be secured; the applicant should also consider whether unit gain is more appropriate than percentage gain. The diverse tree species are positive, and larger-canopied trees should be considered to address urban heat island effects. Clarification is needed on the number of Category B trees to be retained.

Officer response: The applicant has been liaising with Officers and the GLA and revised energy strategy as well as further information has been provided. This is discussed under the energy section of this report and further discussions with the GLA's technical experts will be ongoing prior to Stage 2.

448. Sustainable drainage and flood risk:

- A submitted Flood Risk Assessment shows low residual flood risk with mitigation, and groundwater monitoring is recommended and should be secured via condition.
- The drainage strategy achieves a 93% reduction from existing levels and is acceptable given site constraints. Further hydraulic details are recommended.
- The drainage strategy currently does not meet London Plan Policies SI.13 and SI.5 due to missing details, including SuDS maintenance plans, exceedance flow routes, and the drainage proforma. While water-efficient fittings and leak detection are proposed, no water efficiency data is provided for residential units, and water consumption targets lack explanation. Rainwater harvesting and reuse should be integrated to reduce site-wide water use and enhance sustainability.

Officer response: The council's own flood risk team has reviewed the amendments and are satisfied. The applicant also responded to the drainage matters to the GLA, but the GLA has not provided any further comments.

449. Air Quality:

The air quality assessment does not demonstrate that the development is air quality neutral and lacks key clarifications, including PM2.5 objectives, construction traffic impacts, and emergency generator details. Mitigation measures such as NRMM controls and parking limits are identified but must be secured.

Officer response: Following that initial response the applicant had responded with a revised air quality assessment. The GLA had subsequently reviewed it and came back with minor comments that the applicant had to address. It is felt that on balance the matters are not reasons that would warrant a refusal and can be addressed prior to GLA Stage 2.

- 450. Health and Safety Executive (HSE) - HSE is content with the fire safety design, to the extent that it affects land use planning considerations.
- 451. Historic England – Not offering advice.
- 452. London Fire Brigade - no further observations to make. It should be ensured that if any material amendments to this consultation is proposed, a further consultation may be required.
- 453. Metropolitan Police Designing Out Crime Officer – A pre-application meeting has taken place with the Architects whereby security was discussed and agreed upon. Due to the likelihood of a high volume of pedestrian traffic, increased security measures which will be covered by Secured by Design certification will be required. Due to the size and location of the development, the Counter Terrorism Security Advisor (CTSA) will be contacted post-planning, and will liaise directly with the developer. Recommended conditions (Pre-Commencement and Pre-Occupation) to ensure end to end compliance with Secured by Design.

Officer response: The above is noted.

- 454. Metropolitan Police - A separate comment has been received from the Met Police. The impacts of the development are such that they cannot be met without additional staff deployed at a level consistent with the current Policing of the locality of the development. The proposed development will increase the population and will bring additional policing demands. Request s106 contribution of £ 21,214.15 to mitigate the impacts and towards a number of infrastructure for policing activities in London.

Officer response: It is not considered that s106 contribution towards these capital or revenue requests would meet the planning tests. No contribution would be sought in this instance.

- 455. National Air Traffic Safeguarding (NATS) – No objections.
- 456. Network Rail – The Elephant and Castle station is in need of significant improvements. Network Rail are working with London Borough of Southwark to identify opportunities to help fund these improvements, including using CIL funding. To ensure new users can be accommodated, Network Rail seeks that the CIL contribution from this development be put towards funding station improvements at Elephant and Castle mainline station.

Officer response: The overall conclusion was reached that there would not be a significant effect on public transport services in connection with the proposed

development. The development will still be required to make a substantial CIL payment, which is to be used to fund the delivery of supporting infrastructure.

457. NHS - A large influx of students into the area will have an impact on health infrastructure which should be a consideration. This will impact on the use of local health services. Secondly, this development, especially when considered within the Elephant and Castle Opportunity Area will contribute towards the significant demand for health services in the area. Request a total S106 contribution is £24,000, solely for mitigating the development's impact on primary care services. A new health facility is planned within the Elephant and Castle development to support the growing population. This facility is still not fully funded. Any contributions from this development could be purposed to fit out this facility. The application does not include a Health Impact Assessment. HIAs require developers to assess the impacts on health up-front, with justification given to the way in which spaces are designed. However, it is noted a Health Baseline Assessment has been provided. This provides a limited summary of the health profile of the surrounding area but does not provide any mitigation measures or assessment of the proposed development on the wider health of the community.

Officer response: The significant CIL receipts would contribute to funding either the Health Hub or other initiatives and the use of CIL is the correct mechanism in this case. The applicant has amended the Health baseline assessment to indicate the impacts of the development.

458. Transport for London – Several rounds of correspondence had taken place and TfL raised a number of concerns and request for financial contributions. The applicant had made amendments in response, and this is a summary below.
- A day and night-time active travel zone assessment has been provided, however, there is no commitment to any improvements and to working with the Council (and TfL where appropriate) to improve the active travel routes and public realm within the development in the locality.
 - From the trip generation provided, it is not expected to have a residual impact on the public transport network.
 - The TfL Cycle Hire (£120,000) contribution should be secured via S106.
 - Improvements to active travel links and bus stops are required to justify the shortage of disabled car parking spaces.
 - All proposed car parking spaces should have electric vehicle charging points.
 - Cycle parking does not meet the minimum quantity standards in Policy T5.
 - A full travel plan should be secured through condition, including measures to encourage active and sustainable travel.
 - On-site servicing is proposed in line with Policy T7 and shared with Avonmouth House, but concerns remain over tracking and access. A Delivery and Servicing Plan and Construction Logistics Plan should be secured by condition, ensuring off-street deliveries, sustainable transport use, and safe pedestrian/cyclist movement. Engagement with TfL is needed, and coordination with the adjacent student block is essential due to shared unloading area. A revised student move-in/out management plan should also be secured, addressing cumulative impacts on the transport

network. Deliveries should occur off-street; use of sustainable transport should be explored; and safe movement of pedestrians and cyclists maintained throughout the construction period. Compliance with FORS silver/CLOCS for haulage contractors should be committed to.

Following the initial response, the applicant had responded, and TfL's remaining points related to the following:

- Securing an ATZ contribution in the s106 but no amount was given.
- questioned whether a contribution towards Southwark Council's cycle improvement schemes nearby, e.g., on Borough Road be secured.
- securing £120 000 towards TfL Cycle Hire (Santander Cycles).
- The updated tracking appears tight, but happy to defer to Southwark Transport colleagues over whether this is acceptable.
- The response provided does not address our concerns relating to construction. Request that vehicles enter and exit the site in forward gear.
- request that traffic management details, including how two-way vehicle traffic will be managed and residual carriageway widths are provided. Traffic Management to ensure that this manoeuvre is safe is required.
- The proposed mix of stands is not acceptable and other comments relating to the size of the cycle store and access.

Officer response: The Transport section of this report details the cycle store provision and securing CLP and DEMP/CEMP. TfL has not provided details of a possible location for the cycle hire docking station. As such, this contribution will not be secured.

459. TfL Infrastructure Protection - No objection in principle to the planning application, but there are a number of potential constraints on the redevelopment of a site situated close to London Underground tunnels and infrastructure. Therefore, request that the grant of planning permission be subject to conditions.

Officer response: A condition will be imposed.

460. Thames Water -
With regard to the combined waste water network infrastructure capacity, there are no objections.

Thames Water requests that the applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Seek that the Council impose an informative to any planning consent for a Groundwater Risk Management Permit from Thames Water.

Informative recommended: 15 meters from underground wastewater assets and Flow Rate. The developer should take account of this minimum pressure in the design of the proposed development. Submit a foundation/piling layout plan clearly indicating the locations of all foundation/piles to be installed on the development site.

Condition recommended: No occupancy until water network upgrades are completed or a phasing plan is agreed with Thames Water. The proposed development is located within 15 metres of a strategic sewer. A condition for a Piling Method Statement recommended.

No building over or within 3 meters of water mains.

Officer response: The above is noted.

Consultation responses from internal consultees

461. CCTV- Chargeable surveys will be required to establish alternative viable options, taking into considerations other new builds in the area and changes to planned phases. With an increase of residential dwellings 243 student bedrooms; and flexible commercial, business, floorspace footfall in the public realm, camera coverage will need to be increased in Avonmouth Street and Tiverton Street in the interest of public safety. The requirement to have agreement for a point of presence on roof space on the development for CCTV radio transmission as well as provision after the build is complete or in the future to reroute and or expand our network.
462. Existing CCTV cameras in the area of the site on Newington Causeway will be impacted and require relocation to alternative locations on Newington Causeway. Cameras are required to be moved and contribution is sought. There will be a 7% design consultant fee added for the of all works carried out.

Officer response: The above will be secured in a s106 agreement, but it is not considered necessary to request a contribution towards the surveys.

463. Environmental Protection Team - EPT has reviewed RBA acoustics noise impact assessment report. The assessment determined the day and nighttime background noise levels that shall be use at the design stage of the project to meet with the Council noise criteria. Conditions are recommended.

With regards to air quality, EPT support the suggested control measures some of which will be incorporated within the CEMP.

With regards to contamination, the report indicated historic uses and based on those uses an intrusive site investigation is required. Recommends a condition.

The DEMP and CEMP highlights and addresses the main environmental issues that can impact existing environment during the demolition and construction process. The site should apply for a S61 under the Control of Pollution Act 1974 to

ensure that the measures contained within the CEMP is followed. Since the CEMP provided is acceptable EPT recommends a compliance condition.

Officer response: Whilst the recommendation is for a compliance condition, it is considered appropriate and reasonable to secure further details for approval as noted in the main report.

464. Flood Risk Management Team –

In terms of drainage hierarchy, there is no objection. With regards to the run-off rate - the applicant proposes to discharge the site at 2l/s. This is not the same as the greenfield runoff rate, however, it does meet with Southwark's policy requirements. In terms of maintenance, the drainage strategy includes the maintenance tasks and frequencies for each drainage component proposed. The Flood Risk team had wanted more information and calculations on the attenuation volume. Since those comments, the applicant had provided further details and confirms no flooding is now shown up to and including the 1 in 100 + 40% climate change event. Conditions have been recommended to request details of the proposed surface water drainage system incorporating SuDS including detailed design, size and location of attenuation units and details of flow control measures and the submission of a drainage verification report.

Officer response: This is noted.

465. Waste Management Team – The developer will need to ensure appropriate capacities for recycling and refuse are still complied with as per guidance notes. Initial comments also stated that whilst private waste collections are acceptable, if this private collection falls through then the council would have a duty to collect the residential waste.

Officer response: The applicant has confirmed that it will be private collection and it is recommended that an agreement between the operator and waste collectors be submitted in the s106. The applicant has also shown an indicative location for a dropped kerb on Avonmouth Street in the event that the council would need to collect the waste.

466. Local Economy (LET) - In general, LET is happy to support this application. The loss of employment space is noted and acceptable. There should be a loss of employment space financial contribution.

This development would be expected to deliver 19 sustained jobs to unemployed Southwark residents, 19 short courses, and take on 4 construction industry apprentices during the construction phase or meet the Employment and Training Contribution.

An employment, skills and business support plan should be secured in the s106. The s106 agreement should also secure the affordable workspace and local procurement.

Officer response: The above is noted.

467. Highways – There has been several rounds of correspondence from the Highways team. One of the comments was the servicing vehicle turning movements within the proposed yard. Following further clarification from the applicant, this aspect is satisfied. Highways also listed the s278 works expected to be secured. Since the application site falls within 'Town Centre' designation the footways should be paved with Granite natural stone paving slabs with 300 wide granite kerbs. Comments were also given regarding surface water flowing onto public highway. A condition is also recommended to secure a joint condition survey to catalogue condition of streets and drainage gullies.

Officer response: The s278 works and condition will be secured.

468. Network Management – Seek the completion of the Southwark's Construction Management Plan Pro Forma and seek a full traffic management plan of how deliveries will be managed into the site and drawings for any other large vehicles and vehicle tracking. It is noted in the submitted drawing that a large tipper is stopped/parked up outside of site, this area forms part of a very narrow road on the network. In addition to this, there is an ongoing development adjacent, no vehicle will be able to stop at this location.

Officer response: DEMP/CEMP and CLP will be secured post-permission.

Community impact and equalities assessment

469. 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.

470. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.
471. The Council must not act in a way which is incompatible with rights contained within the European Convention of Human Right
472. The PSED requires public authorities to have due regard to the aims of the duty when making decisions and setting policies. As set out in the council's Development Consultation Charter (DCC), the PSED does not apply to developers however, to be compliant with the DCC, the council require developers to support the council in meeting and discharging this important duty by providing a proportionate Equalities Impact Assessment (EQIA) of the impacts of the development. The EQIA must illustrate how the proposal will remove or minimise disadvantages suffered by people due to their protected characteristics, what steps have been taken to meet the needs of people from protected groups where these are different from the needs of other people, and detail positive equalities impacts.
473. The submitted EQIA was revised through the course of the application. It focuses on the loss of the existing job centre. The EQIA has identified that the proposals will have a potentially disproportionate impact on older people, disabled people, women, pregnant people, and parents with small children. Construction and demolition work could disproportionately impact upon older people, disabled people and parents with small children. Furthermore, additional journeys may incur an additional cost to Jobcentre attendees, which will have a negative socio-economic impact on some with protected characteristics.
474. It is noted that disabled people may experience additional challenges in travelling to a new site, particularly if reliant on public transport or taxi services. Women are statistically more likely to have caring responsibilities outside of work, so a relocation/increased travel times may have an impact on their ability to undertake these responsibilities.
475. The mitigations outlined within the EQIA rely on the potential capacity of other Job centres to absorb additional claimants. The submitted EQIA confirms that there are existing Jobcentres in surrounding areas including Kennington Park (8 min journey), Stockwell (16 min journey), Peckham (20 min journey), Tower Hill (21 min journey) and Marylebone (27 min journey), which may have capacity to absorb additional claimants.
476. Mitigation measures have been proposed, but these rely on DWP to undertake and is not within the control of the applicant. The applicant has also stated that discussions are ongoing about a decant to alternative premises for the Job centre. This included both to the proposed development or a relocation to the Avonmouth House development. Despite these offers (similar terms as the existing site), the DWP have not responded. The applicant has provided the mitigation measure, and it is for DWP to make that decision. The applicant is however, committed to supporting the DWP to find alternative suitable accommodation in the local area.

477. The demolition and construction activity associated with the proposed development will generate employment opportunities in construction and related sectors across the economy and would therefore generate an overall minor beneficial impact on the general population. Once the development is completed there would be net additional jobs that would provide people, including residents from across all priority groups considered, with the opportunity to access new jobs, potentially increasing income levels and improving their overall quality of life, whilst also lowering local inequality.
478. The affordable housing PIL would increase the provision of affordable housing in the borough. The equality impact of the proposed development on residents who require access to social housing and residents on low income and/or who are unemployed is therefore judged as beneficial. The proposal includes the provision of a new public realm which would improve accessibility and would be designed to assist people with mobility impairments. 5% of the rooms would be wheelchair accessible, as would all of the ancillary and common spaces. 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

479. 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.
480. This application has the legitimate aim of redeveloping the site for comprehensive development comprising large-scale purpose-built student accommodation units, affordable workspace, office space, public realm improvements, landscaping and other associated works. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

481. **Positive and proactive engagement: Summary table**

Was the pre-application service used for this application?	YES
If the pre-application service was used for this application, was the advice given followed?	YES
Was the application validated promptly?	YES
If necessary/appropriate, did the case officer seek amendments to the scheme to improve its prospects of achieving approval?	YES

CONCLUSION

482. In land use terms, the development would deliver an improved commercial office space including affordable workspace, creating the potential for more jobs than currently exist on the site and would bring a positive economic benefit to the Borough. Whilst there is a net loss of employment floorspace, the qualitative improvement is considered a benefit. The applicant has offered alternative accommodation for the existing occupants (DWP's job centre and Blue Optima) and will continue to assist them in their relocation. The proposal would also deliver high quality student accommodation, which will complement the existing student accommodation nearby and will make a positive contribution to the Elephant and Castle Town Centre.
483. There is support in the London Plan and Southwark Plan for student housing, which contributes to a mixed and inclusive community helps to release local family housing and is counted towards the borough's housing delivery. In a well-connected location, 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.
484. Prior to the submission of the planning application, the applicant engaged in pre-application discussions with the Council, the Greater London Authority, Transport for London and the Design Review Panel amongst other stakeholders. Extensive public consultation with local residents, including the relevant TRAs, has also been undertaken.
485. The proposal would be a direct-let scheme and would not include any affordable student rooms. As no conventional affordable housing is proposed within the redevelopment, a payment-in-lieu is proposed of £11,056,500, which equates to 35% affordable housing by habitable room. This application has followed the Viability Tested Route. The Council's consultant has scrutinised the Financial Viability Assessment and has concluded that the PIL goes beyond the maximum viable amount of contribution that the scheme can support. The PIL could potentially be used to directly support the delivery of affordable housing close to the application site. The PIL is therefore considered to be a benefit of the application.
486. The scheme has been designed following pre-application advice and discussions and has taken on board Officers and the Design Review Panel's comments. The height of the building is taller than its immediate neighbouring properties, but the site is located in an opportunity area and forms the gateway to Elephant and Castle, where tall buildings are an established part of the area's character. Furthermore, the site allocation had highlighted that comprehensive redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape. As noted in the report, whilst there would be 'Less than Substantial' harm to the setting of the Grade II Listed Sessions Courthouse, this is at the lower end of the scale of harm and the development presents public benefits that on balance outweigh this harm.

487. The proposal will deliver a high quality building which will optimise the use of the site. As a tower of middle order, it is exemplary by design and a fitting addition to the London skyline.
488. In accordance with Policy D13 the design of the proposed development will mitigate noise from multiple sources by incorporating mitigation measures early in the design stage and having appropriate provisions in place for ongoing and future management of those mitigation measures. This will ensure compliance with the Agent of Change principles and ensure an acceptable internal noise standard for future residents.
489. The development has been designed to minimise and mitigate the potential impacts on the amenity of existing and planned future residents as much as possible. Nevertheless, for the reasons demonstrated in this report the development will give rise to some adverse effects, specifically with regards to daylight and sunlight when complete. As explained in the report, the BRE guidelines are not a rigid set of rules but are advisory and need to be applied according to the specific context of a site. It is also important to note that the existing scale of development on the application site is low for an urban location. As a result, reductions in daylight and sunlight would be expected to result from any development here.
490. The car-free scheme with the exception of wheelchair parking spaces is welcomed for this site and the scheme would have a travel plan. The provision of cycle stores and cargo bike hire and financial contribution towards the Newington Causeway bus and cycling scheme would encourage the existing and future residents to use this sustainable mode of transport. Demolition and construction impacts would be managed by management plans.
491. In terms of energy and sustainability, the proposals exceed the policy minimum, achieving cumulative carbon savings of 37.2% against the Part L 2021 baseline. Alongside securing the biodiversity net gain, the proposal would achieve a UGF score of 0.34. Whilst this falls below GLA's policy of 0.4, this site has had to contend with access, servicing and refuse collection all on site and the applicant has maximised the amount of greening possible. The applicant will make a financial contribution towards planting of new trees in the borough. 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.
492. It is therefore recommended on balance that planning permission is granted, subject to:
- conditions as set out in the attached draft decision notice;
 - referral to the GLA;
 - the timely completion of a Section 106 Agreement;

BACKGROUND INFORMATION

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: Application file: 24/AP/3621 Southwark Local Development Framework and Development Plan Documents	Environmental, Neighbourhood s and Growth Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov. uk Case officer email: Wing.lau@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

AUDIT TRAIL

Lead Officer	Stephen Platts, Director of Planning and Growth		
Report Author	Wing Lau, Team Leader		
Version	Final		
Dated	22 October 2025		
Key Decision	No		
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER			
Officer Title	Comments Sought	Comments included	
Strategic Director, Finance	No	No	
Strategic Director, Environment, Neighbourhoods and Growth	No	No	
Strategic Director, Housing	No	No	
Date final report sent to Constitutional Team		22 October 2025	

Appendix 1: Recommendation

This document shows the case officer's recommended decision for the application referred to below.

This document is not a decision notice for this application.

Applicant	Newington Causeway Investments Limited	Reg. Number	24/AP/3621
Application Type	Major application		
Recommendation	GRANT subject to Legal Agreement (GOL)	Case Number	

1. Approved plans

The development shall be carried out in accordance with the following approved plans:

Reference no./Plan or document name/Rev.	Received on:
3451-ACA-XX-XX-DR-A-120504 P02 L4-L16 CLUSTER	20.03.25
3451-ACA-XX-XX-DR-A-120505 P02 L3-L15 ACCESSIBLE STUDIO	20.03.25
3451-ACA-XX-XX-DR-A-120506 P02 L17 STANDARD STUDIO	20.03.25
3451-ACA-XX-XX-DR-A-120507 P02 L17 -L18 STANDARD STUDIO	20.03.25
3451-ACA-XX-XX-DR-A-120508 REV P01 L16-L17 STANDARD STUDIO 1-50	03.07.25
3451-ACA-XX-B01-DR-A-190009 P07 B01 SITEWIDE FLOOR PLAN	20.03.25
3451-ACA-XX-00-DR-A-190100 P09 L00 SITEWIDE FLOOR PLAN	20.03.25
3451-ACA-XX-01-DR-A-190101 P07 L01 SITEWIDE FLOOR PLAN	20.03.25
3451-ACA-XX-02-DR-A-190102 P07 L02 SITEWIDE FLOOR PLAN	20.03.25
3451-ACA-XX-03-DR-A-190103 P08 L03 SITEWIDE FLOOR PLAN	20.03.25
3451-ACA-XX-04-DR-A-190104 P08 L04 SITEWIDE FLOOR PLAN	27.05.25
3451-ACA-XX-05-DR-A-190105 P08 L05 SITEWIDE FLOOR PLAN	27.05.25
3451-ACA-XX-06-DR-A-190106 P08 L06 SITEWIDE FLOOR PLAN	27.05.25
3451-ACA-XX-07-DR-A-190107 P08 L07 SITEWIDE FLOOR	27.05.25

PLAN	
3451-ACA-XX-08-DR-A-190108 P08 L08 SITEWIDE FLOOR PLAN	27.05.25
3451-ACA-XX-09-DR-A-190109 P08 L09 SITEWIDE FLOOR PLAN	27.05.25
3451-ACA-XX-10-DR-A-190110 P08 L10 SITEWIDE FLOOR PLAN	27.05.25
3451-ACA-XX-11-DR-A-190111 P08 L11 SITEWIDE FLOOR PLAN	27.05.25
3451-ACA-XX-12-DR-A-190112 P08 L12 SITEWIDE FLOOR PLAN	27.05.25
3451-ACA-XX-13-DR-A-190113 P08 L13 SITEWIDE FLOOR PLAN	27.05.25
3451-ACA-XX-14-DR-A-190114 P08 L14 SITEWIDE FLOOR PLAN	27.05.25
3451-ACA-XX-15-DR-A-190115 P09 L15 SITEWIDE FLOOR PLAN	27.05.25
3451-ACA-XX-16-DR-A-190116 P09 L16 SITEWIDE FLOOR PLAN	03.07.25
3451-ACA-XX-17-DR-A-190117 P10 L17 SITEWIDE FLOOR PLAN	03.07.25
3451-ACA-XX-18-DR-A-190118 P08 L18 SITEWIDE FLOOR PLAN	27.05.25
3451-ACA-XX-19-DR-A-190119 P08 L19 SITEWIDE ROOF PLAN	20.03.25
3451-ACA-XX-B01-DR-A-191010 P09 B01 GENERAL ARRANGEMENT	02.05.25
3451-ACA-XX-00-DR-A-191100 P09 L00 GENERAL ARRANGEMENT	20.03.25
3451-ACA-XX-01-DR-A-191101 P08 L01 GENERAL ARRANGEMENT	20.03.25
3451-ACA-XX-02-DR-A-191102 P08 L02 GENERAL ARRANGEMENT	20.03.25
3451-ACA-XX-03-DR-A-191103 P09 L03 GENERAL ARRANGEMENT	20.03.25
3451-ACA-XX-04-DR-A-191104 P09 L04 GENERAL ARRANGEMENT	27.05.25
3451-ACA-XX-05-DR-A-191105 P09 L05 GENERAL ARRANGEMENT	27.05.25
3451-ACA-XX-16-DR-A-191116 P01 L16 GENERAL ARRANGEMENT	03.07.25
3451-ACA-XX-17-DR-A-191117 P10 L17 GENERAL ARRANGEMENT	03.07.25
3451-ACA-XX-18-DR-A-191118 P09 L18 GENERAL ARRANGEMENT	27.05.25
3451-ACA-XX-19-DR-A-191119 P08 L19 GENERAL ARRANGEMENT PLANNING	20.03.25
3451-ACA-XX-B01-DR-A-192001 P04 B01 CYCLE STORE	07.07.25
3451-ACA-XX-01-DR-A-192002 P04 L01 CYCLE STORE	07.10.25
3451-ACA-XX-00-DR-A-192003 P01 L00 CYCLE STORE	07.07.25

3451-ACA-XX-ZZ-DR-A-290002 P06 NORTH EAST ELEVATION 1-100	28.05.25
3451-ACA-XX-ZZ-DR-A-290003 P06 NORTH WEST ELEVATION 1-100	28.05.25
3451-ACA-XX-ZZ-DR-A-290004 P07 SOUTH EAST ELEVATION 1-100	28.05.25
3451-ACA-XX-ZZ-DR-A-290005 P07 SOUTH WEST ELEVATION 1-100	28.05.25
3451-ACA-XX-ZZ-DR-A-290007 P07 NORTH EAST ELEVATION 1-200	05.12.24
3451-ACA-XX-ZZ-DR-A-290008 P07 NORTH WEST ELEVATION 1-200	05.12.24
3451-ACA-XX-ZZ-DR-A-290009 P08 SOUTH EAST ELEVATION 1-200	20.03.25
3451-ACA-XX-ZZ-DR-A-290010 P08 SOUTH WEST ELEVATION 1-200	27.05.25
3451-ACA-XX-XX-DR-A-291004 P01 BAY STUDY – COMMUNAL KITCHENS	23.04.25
3451-ACA-XX-XX-DR-A-291005 P01 BAY STUDY – REAR ELEVATION MIDDLE	23.04.25
3451-ACA-XX-XX-DR-A-291006 P01 BAY STUDY – NE ELEVATION BASE AND MIDDLE	23.04.25
3451-ACA-XX-XX-DR-A-291007 P01 BAY STUDY – NE ELEVATION CROWN	23.04.25
3451-ACA-XX-XX-DR-A-291031 P01 BAY STUDY NC ELEVATION BASE	25.04.25
3451-ACA-XX-XX-DR-A-291032 P01 BAY STUDY NC ELEVATION BASE	25.04.25
3451-ACA-XX-XX-DR-A-291033 P01 BAY STUDY NC ELEVATION MIDDLE	25.04.25
3451-ACA-XX-XX-DR-A-291034 P01 BAY STUDY NC ELEVATION MIDDLE	25.04.25
3451-ACA-XX-XX-DR-A-291035 P01 BAY STUDY NC ELEVATION CROWN	25.04.25
3451-ACA-XX-XX-DR-A-291036 P01 BAY STUDY NC ELEVATION CROWN	25.04.25
3451-ACA-XX-XX-DR-A-291037 P01 BAY STUDY REAR ELEVATION MIDDLE	25.04.25
3451-ACA-XX-XX-DR-A-291038 P01 BAY STUDY REAR ELEVATION MIDDLE	25.04.25
3451-ACA-XX-XX-DR-A-291039 P01 BAY STUDY COMMUNAL KITCHENS	25.04.25
3451-ACA-XX-XX-DR-A-291040 P01 BAY STUDY COMMUNAL KITCHENS	25.04.25
3451-ACA-XX-ZZ-DR-A-390005 P03 NORTH WEST LOOKING SECTION 1-100	20.03.25
3451-ACA-XX-ZZ-DR-A-390006 P04 NORTH EAST LOOKING SECTION 1-100	20.03.25
3451-ACA-XX-XX-DR-A-390501 P01 NORTH WEST LOOKING SECTION NC AND BALPPA HOUSE	17.07.25

3451-ACA-XX-XX-DR-A-390502 P01 NORTH WEST LOOKING SECTION NC AND 2 AVONMOUTH	17.07.25
3451-ACA-XX-XX-DR-A-390503 P01 NORTH WEST LOOKING SECTION NC AND 2 AVONMOUTH	17.07.25
3451-ACA-XX-00-DR-A-150101 P03 L00 REFUSE COLLECTION PLAN	21.05.25

2. Time

The development hereby granted 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.

Prior to commencement of development conditions

3. Trees – Protection measures

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 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 2024; Policies G1 (Green Infrastructure, G5 (Urban Greening) and G7 (Trees and Woodlands) 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).

4. Trees – Planting Strategy

Prior to works commencing (excluding demolition, site clearance and excavation), full details of all the proposed planting of 20 trees shall be submitted to and approved in writing by the Local Planning Authority. This will include tree pit cross sections, planting and maintenance specifications, use of guards or other protective measures and confirmation of location, species, sizes, nursery stock type, supplier and defect period.

Details of a management plan, responsibilities and maintenance schedules shall be submitted to and approved by the Local Planning Authority. This shall include an irrigation schedule 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.

All tree planting shall be carried out in accordance with those details and at those times. All trees and shrubs will conform to the specification for nursery stock as set out in British Standard 3936 Parts 1 (1992) and 4 (1984). Advanced Nursery stock trees shall conform to BS 5236 and BS: 4428 Code of practice for general landscaping operations; BS 8545:2014 Trees: from nursery to independence in the landscape; BS: 5837 (2012) Trees in relation to demolition, design and construction; BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf); EAS 03:2022 (EN) - Tree Planting Standard, and Trees and Design Action Group guidance.

If within a period of five years from the date of the planting of any tree that tree, or any tree planted in replacement for it, is removed, uprooted or destroyed or dies, or becomes, in the opinion of the local planning authority, seriously damaged or defective, another tree of the same species and size as that originally planted shall

be planted at the same place in the first suitable planting season., unless the local planning authority gives its written consent to any variation.

Reason: So that the Council may be satisfied that the proposed tree planting scheme in accordance with the National Planning Policy Framework 2024; 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).

5. Archaeological Evaluation

Before any work hereby authorised begins, excluding demolition to slab level and site investigation works, the applicant shall secure the implementation of a programme of archaeological evaluation works in accordance with a written scheme of investigation which shall be submitted to and approved in writing by the Local Planning Authority.

Reason: In order that the applicants supply the necessary archaeological information to ensure suitable mitigation measures and/or foundation design proposals be presented in accordance with Policy P23 Archaeology of the Southwark Plan (2022) and the National Planning Policy Framework 2024.

6. 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.

7. 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.

8. Drainage Strategy

No works (excluding demolition and site clearance) shall commence until full details of the proposed surface water drainage system incorporating Sustainable Drainage Systems (SuDS) have been submitted to and approved in writing by the Local Planning Authority, including detailed design, size and location of attenuation units and details of flow control measures. The strategy should achieve a reduction in surface water runoff rates during the 1% Annual Exceedance Probability (AEP) event plus climate change allowance, as detailed in the Drainage Strategy Report prepared by Walsh (dated 18/03/25). 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).

9. Land Contamination

a) The phase 1 site investigation reveals possible presence of contamination on or beneath the site or controlled waters, then, prior to the commencement of development works, an intrusive site investigation and associated risk assessment shall be completed to fully characterise the nature and extent of any contamination of soils and ground water on the site.

b) In the event that contamination is found that presents a risk to future users or controlled waters or other receptors, a detailed remediation and/or mitigation strategy shall be prepared and submitted to the Local Planning Authority for approval in writing. The strategy shall detail all proposed actions to be taken to bring the site to a condition suitable for the intended use together with any monitoring or maintenance requirements. The scheme shall also ensure that as a minimum, the site should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. The approved remediation scheme (if one is required) shall be carried out and implemented as part of the development.

c) Following the completion of the works and measures identified in the approved remediation strategy, a verification report providing evidence that all works required by the remediation strategy have been completed, together with any future monitoring or maintenance requirements shall be submitted to and approved in writing by the Local Planning Authority.

d) In the event that potential contamination is found at any time when carrying out the approved development that was not previously identified, it shall be reported in writing immediately to the Local Planning Authority, and a scheme of investigation and risk assessment, a remediation strategy and verification report (if required) shall

be submitted to the Local Planning Authority for approval in writing, in accordance with a-d above.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off-site receptors in accordance with Policies P56 (Protection of amenity); Policy P64 (Contaminated land and hazardous substances) of the Southwark Plan 2022, and the National Planning Policy Framework 2024.

10. London Underground Infrastructure Protection

Each stage of the development hereby permitted shall not be commenced until detailed design and method statements (in consultation with TfL Infrastructure Protection) have been submitted to and approved in writing by the local planning authority which:

1. Provide plans and elevations of the proposed development;
2. The development must be shown to take no support from LUL land or property or to detrimentally change the loading on them. A Ground Movement Assessment (GMA) will be required together with Cat 2 or Cat 3 Check on the GMA – monitoring may be required;
3. Site specific Risk Assessments and Method Statements (RAMS) to be agreed with TfL Engineering for any activities which TfL may deem to be a risk to LU. The RAMS should be issued a minimum of 6 weeks prior to the individual activity commencing;
4. Demonstrate to TfL's satisfaction that the methods and timing of the works are not contrary to the contents of LU's document "Special Conditions for Outside Parties working on or near the railway";
5. An assessment of railway noise and vibration shall be carried out and appropriate protective measures shall be taken to protect the users of the property and of other properties potentially affected as a result of the current development against noise and vibration;
6. Details of any proposed boreholes or bored piles shall be submitted to LUL and their written approval obtained. Driven piles will not be permitted in the vicinity of LUL's tunnels or other subsurface structure.

The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied.

Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with the London Plan 2021 Policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.

11. Piling Method statement

No piling shall take place until a Piling Method Statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan.

Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. In the interests of protecting key water supply assets having regard to the close proximity of the proposed development to, and thus its potential impact on, underground water utility infrastructure, in accordance with: the National Planning Policy Framework 2024; and Policy SI5 (Water Infrastructure) of the London Plan 2021.

Above grade conditions

12. Section detailed drawings

Notwithstanding the detail shown on approved drawings or documents, prior to the commencement of superstructure works within each relevant Phase, 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;
 - Junctions of exposed structural elements (columns, beams and floors);
 - Head, cills and jambs of openings;
 - Parapets and roof edges;
 - Rooftop balustrades and crowns;
 - Shopfronts
- ii. Entrances (including any access sashes, security gates, entrance portals and awnings);
- iii. Typical windows including confirmation of the open types, lintels, cills, glazing specification and depth of window reveals;
- iv. Plant screening/ enclosure;

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.

13. Materials Schedule and on-site presentation of mock up panels

Notwithstanding the detail shown on approved drawings or documents, prior to installation of any facade,

- a) the specification of each facing materials to be used 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) and approved in writing by the Local Planning Authority (the detailed scope of mock up requirements to have been agreed with the Local Planning Authority in advance of them being constructed and presented on site).

The development shall not be carried out other than in accordance with any such approval given.

Reason: In order that the Local Planning Authority may be satisfied that these samples will make an acceptable contextual response in material terms, will achieve a high quality of design and detailing, and are consistent with the consented scheme, in accordance with: the National Planning Policy Framework 2024; Policy D4 (Delivering Good Design) of the London Plan 2021; and Policies P13 (Design of Places) and P14 (Design Quality) of the Southwark Plan 2022.

14. Hard and Soft Landscaping

Before any above grade work hereby authorised begins (excluding demolition, site clearance and excavation), detailed drawings of a hard and soft landscaping and public realm scheme for the Public Realm, ground floor spaces and roof terrace shall be submitted to and approved in writing by the Local Planning Authority.

The site shall be landscaped strictly in accordance with the approved details in the first planting season after completion of the development. Details shall include:

- 1) a scaled plan showing all existing vegetation and landscape features to be retained with proposed trees, hedging, perennial and other plants including mound height;
- 2) proposed vehicular access, or pathway layouts, materials and edge details;

- 3) location, type and materials to be used for hard landscaping including specifications, where applicable for:
 - a) permeable paving
 - b) tree pit design
 - c) underground modular systems
 - d) sustainable urban drainage integration
 - e) use within tree Root Protection Areas (RPAs);
- 4) typical cross sections;
- 5) a schedule detailing sizes and numbers/densities of all proposed trees/plants including details of native planting. Ideally the landscape planting should contain a minimum of 60% of plants on the RHS perfect for Pollinators list.;
- 6) specifications for operations associated with plant establishment and maintenance that are compliant with best practise; and
- 7) types and dimensions of all boundary;
- 8) appropriate privacy buffers between communal amenity areas and the private student rooms;
- 9) street furniture on the ground floor level and on the roof terrace, including type, materials and manufacturer's specification, if appropriate;
- 10) a statement setting out how the landscape and public realm strategy provides for disabled access, ensuring equality of access for all, wheelchairs users and people with visual impairment or limited mobility;

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. All ground floor amenity within the development shall be available to all residential occupiers of the development in perpetuity.

Unless required by a separate landscape management condition, all soft landscaping shall have a written five-year maintenance programme following planting.

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).

15. Bat Boxes

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

No less than 2 No. bat tubes, bricks or boxes shall be provided and the details shall include the exact location, specification and design of the habitats.

(ii) Full details of the roost features and mapped locations to meet the requirements of (i) shall be submitted to and approved in writing by the Local Planning Authority

(iii) Evidence shall be submitted in writing to the Local Planning Authority to show that the roost features have been installed in full in accordance with part (ii)

(iii) The bat tubes, bricks or boxes shall be installed with the development prior to the first occupation of the building to which they form part or the first use of the space in which they are contained and maintained in perpetuity.

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with the National Planning Policy Framework (2024); Policy G1 (Green Infrastructure), Policy G5 (Urban Greening), Policy G6 (Biodiversity and access to nature) of the London Plan (2021); Policy P59 (Green infrastructure) and Policy P60 (Biodiversity) of the Southwark Plan (2022).

16. Bee Bricks

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

No less than 2 No. Bee bricks and/or invertebrate hotels shall be provided and the details shall include the exact location, specification and design of the habitats.

(ii) Full details of the features and mapped locations to meet the requirements of (i) shall be submitted to and approved in writing by the Local Planning Authority

(iii) Evidence shall be submitted in writing to the Local Planning Authority to show that the features have been installed in full in accordance with part (ii)

(iii) The Bee bricks and/or invertebrate hotels shall be installed with the development prior to the first occupation of the building to which they form part or the first use of the space in which they are contained and maintained in perpetuity

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with the National Planning Policy Framework 2024; Policy G1 (Green Infrastructure), Policy G5 (Urban Greening), Policy G6 (Biodiversity and access to nature) of the London Plan (2021); Policy P59 (Green infrastructure) and Policy P60 (Biodiversity) of the Southwark Plan (2022).

17. Bird Boxes

Details of 2 No. house sparrow terraces shall be submitted to and approved in writing by the Local Planning Authority prior to any superstructure works commencing on site.

No less than 2 No. house sparrow terraces shall be provided. Details shall include the exact location, specification and design of the bird boxes. The boxes shall be installed in suitable locations on mature trees or on buildings prior to the first occupation of the site.

The house sparrow terraces shall be installed strictly in accordance with the details so approved, shall be maintained as such thereafter.

The bird boxes shall be installed strictly in accordance with the details so approved, shall be maintained as such thereafter.

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

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with National Planning Policy Framework (2023); Policy G1 (Green Infrastructure), Policy G5 (Urban Greening), Policy G6 (Biodiversity and access to nature) of the London Plan (2021); Policy P59 (Green infrastructure) and Policy P60 (Biodiversity) of the Southwark Plan (2022).

18. Biodiverse roofs

Prior to the completion of the superstructure of the building hereby approved, details of the biodiversity (green/brown) roof(s) shall be submitted to and approved in writing by the Local Planning Authority. The biodiversity (green/brown) roof(s) shall be:

* biodiversity based with extensive substrate base (depth 80-150mm);

* laid out in accordance with agreed plans; and

* planted/seeded with an agreed mix of species within the first planting season following the practical completion of the building works (focused on wildflower planting, and no more than a maximum of 25% sedum coverage).

- (ii) 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.
- (iii) The biodiversity roof(s) shall be carried out strictly in accordance with the details so approved and shall be maintained as such thereafter.
- (iv) Full Discharge of this condition will be granted once the green/brown roof(s) are completed in full in accordance to the agreed plans. A post completion assessment will be required to confirm the roof has been constructed to the agreed specification.

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

19. Digital connectivity infrastructure strategy

Prior to commencement of above ground superstructure construction works, detailed plans shall be submitted to and approved in writing by the Local Planning Authority demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development. The development shall be carried out in accordance with the approved plans and maintained as such in perpetuity.

Reason: To provide high quality digital connectivity infrastructure to contribute to London's global competitiveness, in accordance with the National Planning Policy Framework 2024; Policy SI 6 (Digital Connectivity Infrastructure) of the London Plan (2021) and Policy P44 (Broadband and digital infrastructure) of the Southwark Plan (2022).

20. Secure by Design

a) Before any above grade work (excluding demolition and superstructure works) hereby approved begins, details of security measures (which target the 'Secured by Design' accreditation award from the Metropolitan Police) shall be submitted to and approved in writing by the Local Planning Authority. The approved details shall be implemented in accordance with the approved details prior to occupation. and to meet the specific security needs of the development in accordance with the principles and objectives of Secured by Design.

b) Prior to the first occupation of the relevant phase hereby approved, confirmation that Secure by Design certification has been achieved shall be 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.

21. Wind mitigation measures and boundary treatment

Before any work above grade hereby authorised begins (excluding demolition, site clearance and excavation), wind CFD testing for mitigation measures including the shall be submitted and approved in writing by the Local Planning Authority. This shall include mitigation measures that would improve the communal terrace area to meet the LDDC comfort rating for 'Long-sitting'. The development shall be carried out in accordance with the approved mitigation measures and maintained as such in perpetuity.

Reason: So that the Council may be satisfied with the details of the landscaping scheme and to ensure that the appropriate Lawson Safety Method and Lawson Comfort Method criteria shall be achieved in accordance with the National Planning Policy Framework 2024, policy D9 ('Tall Buildings') of the London Plan 2021 and policies P14 ('Design quality'), P17 ('Tall Buildings') and P56 ('Protection of amenity') of the Southwark Plan 2022.

22. Energy and Water Efficiency

All rooms and studios shall be constructed in order to achieve the following requirements:

(a) a reduction in potable water demand to a maximum of 105 litres per person per day.

(b) Prior to the commencement of works above the first floor slab (excluding cores) of the relevant Phase or Building of the development a Design Stage Standard Assessment Procedure (SAP) Assessment and Water Efficiency calculations, prepared by suitably qualified assessors, shall have been submitted to and approved in writing by the Local Planning Authority to demonstrate that the detailed design of each dwelling is in compliance with part (a).

The development shall be carried out including the measures to achieve Compliance.

(c) Within 3 months of occupation of any of the student units hereby approved (unless an extension is agreed in writing with the Local Planning Authority), an As Built SAP Assessment and post-construction stage Water Efficiency Calculations, prepared by suitably qualified assessors, shall be submitted

to the Local Planning Authority for approval in writing to demonstrate full compliance with part (a) for each unit.

Reason: To comply with London Plan (2021) Policies SI 2 Minimising greenhouse gas emissions) and SI 5 (Water Infrastructure) and Policies P67 (Reducing water use) and P70 (Energy) of the Southwark Plan (2022).

23. Generator details

Before any work above grade hereby authorised begins (excluding demolition, site clearance and excavation), the details and location of the flue serving the emergency generator (used no more than 50 hours a year) shall be submitted and approved in writing by the Local Planning Authority. This shall include the testing regime and show this is suitably away from sensitive receptors (both proposed and existing). The development shall be carried out in accordance with the approved mitigation measures and maintained as such in perpetuity.

Reason: In the interests of amenity will not cause amenity impacts such as fume or noise nuisance and will not detract from the appearance of the building in accordance with Policies P56 (Protection of amenity); Policy P65 (Improving air quality) of the Southwark Plan 2022 and the National Planning Policy Framework 2024.

Prior to occupation

24. Cycle Parking

Before the first occupation of the development hereby approved, the cycle facilities (including at least 204 long stay cycle storage and 12 short stay cycle storage, showers, changing rooms and lockers where appropriate) as shown on the drawings hereby approved shall be provided and made available to the users of the development. Thereafter, such facilities shall be retained and maintained in perpetuity.

Reason: To ensure that satisfactory safe and secure bicycle parking is provided and retained for the benefit of the users and occupiers of the building in order to encourage the use of alternative means of transport and to reduce reliance on the use of the private car in accordance with the National Planning Policy Framework (2024); Policy T5 (Cycling) of the London Plan (2021); and Policy P53 (Cycling) of the Southwark Plan (2022).

25. Car parking management plan

Prior to the first occupation of any part of the development, a Car Parking Management Plan shall be submitted to and approved in writing by the relevant Local Planning Authority, and must include at least the following details:

(a) the proposed allocation of and arrangements for the management of parking space including the disabled parking bay.

(b) the provision of active Electric Vehicle Charging Point (EVCP) to the parking space in accordance with adopted London Plan.

The plan shall also demonstrate that the parking provided as part of the proposed development is used in accordance with its purpose. The plan should also ensure that the parking space provided is used efficiently and correctly and to ensure that relevant controls are in place to inform appropriate parking behaviour.

The car parking shall be provided and managed in accordance with the approved strategy for the life of the development, or as otherwise agreed in writing by the Local Planning Authority.

Reason: Car parking management must be identified prior to the commencement of development to ensure that sufficient off-street parking areas are provided and appropriately allocated and not to prejudice the free flow of traffic or conditions of general safety along the adjoining highway in accordance with the National Planning Policy Framework 2024; Policy T6 (Car parking) of the London Plan (2021); Policies P54 (Car parking) and P55 (Parking standards for disabled people and the physically impaired) of the Southwark Plan (2022).

26. 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: To ensure the safe and sustainable movement of traffic on neighbouring highways, in accordance with the National Planning Policy Framework 2024, Policies T1 (Strategic approach to transport), T3 (Transport capacity, connectivity and safeguarding) and T4 (Assessing and mitigating transport impacts) of the London

Plan (2021) and Policies P49 (Public transport) and P50 (Highways impacts) of the Southwark Plan (2022).

27. Refuse Storage

The development hereby approved shall be carried out 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. The facilities shall be provided prior to the first occupation of the building. 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.

28. 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 Report prepared by Walsh (ref: 6043- WAL-ZZ-XX-RP-C-0300-02, (dated 18/03/25)) and shall include plans, photographs and national grid references of key components of the drainage network such as surface water attenuation structures, flow control devices and outfalls. The report shall also include details of the responsible management company.

Reason: To ensure the surface water drainage complies with Southwark's Strategic Flood Risk Assessment and Policy SI 13 of the London Plan (2021).

29. Lighting

Prior to occupation, a lighting design strategy for biodiversity shall be submitted to and approved in writing by the local planning authority. The strategy shall:

- a) identify those areas/features that are particularly sensitive for bats and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and
- b) show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications including design,

power and position of luminaries, light intensity contours and any dim-down and turn-off times) so that it can be clearly demonstrated that areas to be lit (for the building and associated public realm and external communal amenity space) will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places. Any external lighting system installed at the development shall comply with the Institute of Lighting Professionals (ILP) Guidance Note 1 for the reduction of obtrusive light (2021). All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority. Prior to the new development being first brought into use/occupied a bat friendly Lighting Plan shall be submitted to and approved by the Local Planning Authority.

Reason: To ensure compliance with the Habitats Regulations and the Wildlife & Countryside Act (1981), (as amended), and because bats are known to be active in vicinity of the development site. 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 the amenity and privacy of adjoining occupiers, and their protection from light nuisance, in accordance with the Southwark Plan 2022 Policy P16 (Designing out crime); Policy P56 (Protection of amenity), and the National Planning Policy Framework 2024.

30. Urban Greening Certification

a) Before the first occupation of any part of the development hereby approved, 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 0.34.

b) Within six months of first occupation of the final building hereby permitted, a post construction certificate prepared by a suitably qualified landscape specialist (or other verification process agreed with the Local Planning Authority) shall be submitted to and approved in writing by the Local Planning Authority, confirming that the agreed UGF score of 0.34 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 Policies SP6 (Climate Emergency), P13 (Design of Places), P59 (Green Infrastructure), P60 (Biodiversity) and P65 (Improving Air Quality) of the Southwark Plan 2022.

31. Commercial Kitchen Extract Ventilation

Prior to the occupation of the ground floor use in, full particulars and details of a scheme for the extraction and ventilation of any 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 and show how it shall be cleaned, serviced, maintained and replaced at sufficient intervals to prevent degradation in performance of the system's components affecting surrounding amenity, and fully in accordance with manufacturer's recommendations.

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 Policies P56 (Protection of amenity); Policy P65 (Improving air quality) of the Southwark Plan 2022 and the National Planning Policy Framework 2024.

32. BREEAM

- a) Before the first occupation of the non-residential uses hereby approved, 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 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.

33. Post-Construction Whole Life-Cycle Carbon Reporting

Upon the completion of the as-built design and upon commencement of RIBA Stage 6, but prior to the building being occupied (or handed over to a new owner, if applicable), the legal owner(s) of the development shall submit the Post-Construction Whole Life-Cycle Carbon Assessment (Post- Construction WLCA) to the GLA.

The Post-Construction WLCA shall be submitted to ZeroCarbonPlanning@london.gov.uk. The owner should use the post construction tab of the GLA's WLC assessment template and this should be completed accurately and in its entirety, in line with the criteria set out in the GLA's Whole Life-Cycle Carbon Assessments LPG.

The Post-Construction WLCA should provide an update of the information submitted at planning stage (RIBA Stage 2/3), including the WLC carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the GLA's Whole Life-Cycle Carbon Assessments LPG and should be received no later than three months post as-built design completion, unless otherwise agreed.

Reason: To ensure whole life-cycle carbon is calculated and reduced, and to demonstrate compliance with: the National Planning Policy Framework 2024; and Policy SI 2 (Minimising Greenhouse Gas Emissions) of the London Plan 2021; and Policy P70 (Energy) of the Southwark Plan 2022.

34. Water Infrastructure Network Capacity Upgrades

Prior to the occupation of each relevant Phase or Building confirmation must be 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 development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan.

Reason: The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development"

Compliance

35. Wheelchair Housing

At least 13 (>5%) of PBSA rooms shall be delivered as wheelchair accessible in line with the guidance in BS8300:2:2018 Design of an Accessible and inclusive built environment – Buildings – Code of Practice. This shall comprise 4 per cent wheelchair accessible bedrooms, in accordance with Figures 52 and 54 of the code

of practice and 1 per cent with a tracked hoist system and a connecting door to an adjoining (standard) bedroom for use by an assistant or companion.”

Reason: To ensure the development complies with: the National Planning Policy Framework 2024 and Purpose-Built Student Accommodation London Plan Guidance 2024.

36. 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.

37. Fire Safety Strategy

Unless and until superseded by a updated Strategy approved by the Health & Safety Executive at Gateway 2 or 3, the development hereby approved shall be carried out in accordance with the approved Fire Safety Strategy, which comprises the following documents:

- London Plan Fire Statement 63-67 Newington Causeway 6 December 2024 19149

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 Policies D11 (Safety, Security and Resilience to Emergency) and D12 (Fire Safety) of the London Plan 2021.

38. Servicing Hours

Any deliveries or collections to the development hereby approved shall only be between the following hours, unless otherwise approved by the Local Planning Authority:

- 07:00 to 21:00 Monday to Saturday; and
- 09:00 to 21:00 on Sundays and Bank Holidays.

Reason: To ensure that the occupiers of neighbouring premises do not suffer a loss

of amenity by reason of noise nuisance, and to reduce vehicle movements on the local road network during peak times, in accordance with: the National Planning Policy Framework 2024; Policy T7 (Deliveries, Servicing and Construction) of the London Plan 2021; and Policy P50 (Highways Impacts) of the Southwark Plan 2022.

39. Hours of Operation: Ancillary Cafe

The ancillary Café at ground floor level for which consent is hereby granted for ancillary use to the Class E use shall not be carried on outside of the following hours:

- 07:00hrs to 20:00hrs on Mondays to Saturdays; and
- 09:00hrs to 20:00hrs on Sundays (including Bank Holidays).

Reason: To safeguard the amenities of neighbouring residential properties in accordance with the National Planning Policy Framework 2024, and P56 Protection of amenity of the Southwark Plan (2022).

40. 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. hereafter.

Reason: To ensure that the occupiers and users of the development do not suffer a loss of amenity by reason of excess noise from environmental and transportation sources in accordance with the National Planning Policy Framework 2024; Policy P56 (Protection of amenity) and Policy P66 (Reducing noise pollution and enhancing soundscapes) of the Southwark Plan (2022).

41. Noise levels habitable rooms adjacent to commercial

The habitable rooms within the development sharing a party ceiling or 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.

Reason: To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of noise from activities within the commercial premises in accordance with the National Planning Policy Framework (2024); Policy P56 (Protection of amenity) and Policy P66 (Reducing noise pollution and enhancing soundscapes) of the Southwark Plan (2022).

42. 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 the above standard. Once approved the plant and any acoustic treatments shall be permanently maintained thereafter.

Reason: To ensure that occupiers of dwellings on the site and nearby 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 National Planning Policy Framework (2024); Policy P56 (Protection of amenity) and Policy P66 (Reducing noise pollution and enhancing soundscapes) of the Southwark Plan (2022).

43. Restriction on use class hereby permitted

Notwithstanding the provisions of Class E of the Town and Country Planning (Use Classes) Order 1987 (as amended) and any associated provisions of the Town and Country Planning General Permitted Development Order 2015 (as amended) (including any future amendment or enactment of those Orders) the commercial uses hereby permitted can only fall with Class E(g)(i) unless otherwise agreed by way of a formal application for planning permission. This is with the exception of the ancillary café associated within the ground floor Class E(g)(i) use.

Reason: In granting this permission the Local Planning Authority has had regard to the special circumstances of this case, the requirement to provide employment space on this site, activate the site frontage, protection of amenity and sufficient delivery and servicing provision without harming the surrounding and wishes to have the opportunity of exercising control over any subsequent alternative uses, in accordance with: the National Planning Policy Framework 2024; Policies SD7 (Town centres), S1 (Developing London's social infrastructure), E1 (offices) and E2 (Providing suitable business space) of the London Plan (2021); and Policies P30

(Office and business development), P35 (Town and local centres), P50 (Highways impacts) and P56 (Protection of amenity) and the NSP46 site allocation of the Southwark Plan (2022).

44. Roof Plan - Restriction of 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 condition, 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 enclosures of any building hereby permitted.

Reason: In order to ensure that no additional plant is placed on the roof of the building in the interest of the appearance and design of the building and the visual amenity of the area, in accordance with: the National Planning Policy Framework 2024, Southwark Plan 2022 policies P13 ('Design of places') and P14 ('Design quality') of the Southwark Plan 2022 and policy D4 ('Delivering good design') of the London Plan 2021.

45. Restriction of Instatement of Appurtenances

With the exception of rainwater pipes, no meter boxes, flues, vents or pipes other than as shown on the drawings hereby approved or discharged under an 'approval of details' application pursuant to this condition, shall be fixed or installed on the elevations of the building, unless otherwise approved by the Local Planning Authority.

Reason: To ensure such works do not detract from the appearance of the building in accordance with: The National Planning Policy Framework 2024, Southwark Plan 2022 policies P13 ('Design of places') and P14 ('Design quality') of the Southwark Plan 2022 and policy D4 ('Delivering good design') of the London Plan 2021.

46. Restriction 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.

47. Basement Impact Assessment

Notwithstanding the submitted Basement Impact Assessment prepared by JOMAS ASSOCIATES LTD dated September 2024, before any work, hereby authorised, excluding demolition to slab level, an updated Basement Impact Assessment 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: To ensure the basement is designed safely in reference to ground movement, flood risk and sustainable urban drainage, in accordance with: the National Planning Policy Framework 2024; Policy D10 (Basement Development) of the London Plan 2021; Policies P14 (Design Quality) and P68 (Reducing Flood Risk) of the Southwark plan (2022).

48. Maximum Height

The buildings hereby approved shall have the following maximum storey heights:

Part 19 storeys (62.8m AOD, 59.9m above ground)

Part 18 storeys (58.3m AOD, 55.4m above ground)

Part 3 storeys (14.7m AOD, 11.8m above ground).

Reason: For the avoidance of doubt and in the interests of proper planning.

49. Approved development

The development as a whole comprises:

- 243 student bedrooms;
- 1,484sqm GIA of flexible commercial, business, service floorspace (Class E)

Reason: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.

50. Energy: Compliance

The development hereby approved shall be carried out in accordance with the approved Energy Strategy 'Energy Strategy Report Version 4.0, dated 16 September 2025'.

Reason: To comply with London Plan (2021) Policies SI 2 Minimising greenhouse gas emissions) and SI 5 (Water Infrastructure) and Policies P67 and P70 (Energy) of the Southwark Plan (2022).

51. Windows -Amenity

The window(s) on the northwest elevation of the building and up to the fourth floor level serving the living kitchen rooms shall be obscure glazed and high level opening only and shall not be replaced or repaired otherwise than with obscure glazing.

Reason: In order to protect the privacy and amenity of the occupiers and users of the adjoining premises from undue overlooking in accordance with the National Planning Policy Framework (2024) and Policy P56 (Protection of amenity) of the Southwark Plan (2022).

52. External Noise Levels in Private Amenity Areas

Private and communal external amenity areas shall be designed to attain at least 55dB(A) LAeq, 16hr †.

†Daytime - 16 hours between 07:00-23:00hrs

Prior to the commencement of use of the amenity area/s a proposed scheme of sound reduction shall be submitted to the local planning authority. The scheme of sound reduction shall be installed and constructed in accordance with any approval given and shall be permanently maintained thereafter. Following completion of the development but prior to the commencement of use of the amenity area/s, 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.

Reason: To ensure that the occupiers of the proposed development do not suffer a loss of amenity by reason of excess environmental noise in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2024.

53. Post-completion Circular Economy Reporting

No later than three months following practical completion of the development hereby approved:

- a) a Post-Completion Circular Economy Report setting out the predicted and actual performance against all numerical targets in the Planning Stage Circular Economy Statement shall be submitted to the GLA at CircularEconomyLPG@london.gov.uk, along with any supporting evidence as per the GLA's Circular Economy Statements LPG; and
- b) confirmation of submission of the Post-Completion Circular Economy Report shall be submitted to the Local Planning Authority for approval in writing.

Reason: To ensure the Planning Stage Circular Economy Statement has been implemented in the construction and delivery of the development, and that all on-going operational measures and mechanisms have been satisfactorily implemented, in order to achieve Circular Economy goals and in accordance with: the National Planning Policy Framework 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.

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.

The permission which has been granted has the effect of requiring or permitting the development to proceed in phases. The modifications in respect of the biodiversity gain condition which are set out in Part 2 of the Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024 therefore apply. In summary, biodiversity gain plans are required to be submitted to, and approved by, Southwark Council (the local planning authority) before development may be begun (the overall plan), and before each phase of development may be begun (phase plans).

Informatives

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

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

The fire risk assessment/statement covers matters required by planning policy. This is in no way a professional technical assessment of the fire risks presented by the development. The legal responsibility and liability lies with the 'responsible person'. The responsible person being the person who prepares the fire risk assessment/statement not planning officers who make planning decisions.

2. All wild birds, nests, eggs and young are protected under the Wildlife & Countryside Act 1981 (as amended). The grant of planning permission does not override the above Act. All applicants and sub-contractors are reminded that persons undertaking site clearance, hedgerow removal, demolition works etc. between March and August may risk committing an offence under the above Act and may be liable to prosecution if birds are known or suspected to be nesting. The Council will pass complaints received about such work to the appropriate authorities for investigation. The Local Authority advises that such work should be scheduled for the period 1 September-28 February wherever possible. Otherwise, a qualified ecologist should make a careful check before work begins.

3. Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

4. 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.

5. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are 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-yourdevelopment/> working-near-our-pipes Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

6. A regular local liaison group is to be established during the construction period to which ward councillors, officers and residents are invited.

7. Contaminated soil that is (or must be) disposed of is waste. Therefore, its handling, transport, treatment and disposal are subject to waste management legislation, which includes:

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2016
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standard BS EN14899:2005 'Characterization of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

If the total quantity of hazardous waste material produced or taken off-site is 500kg or greater in any 12-month period, the developer will need to register with us as a hazardous waste producer. Refer to the hazardous waste pages on GOV.UK for more information.

Appendix 2 – Relevant Planning Policy

National Planning Policy Framework

Chapter 2 Achieving sustainable development
 Chapter 5 Delivering a sufficient supply of homes
 Chapter 6 Building a strong, competitive economy
 Chapter 7 Ensuring the vitality of town centres
 Chapter 8 Promoting healthy and safe communities
 Chapter 9 Promoting sustainable transport
 Chapter 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 Policies

Chapter 1
 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

Chapter 2
 Policy SD1 Opportunity Areas
 Policy SD6 Town centres and high streets
 Policy SD10 Strategic and local regeneration

Chapter 3
 Policy D1 London's form, character and capacity for growth
 Policy D2 Infrastructure requirements for sustainable densities
 Policy D3 Optimising site capacity through the design-led approach
 Policy D4 Delivering good design
 Policy D5 Inclusive design
 Policy D6 Housing quality and standards
 Policy 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

Chapter 4
 Policy H1 Increasing housing supply
 Policy H4 Delivering affordable housing
 Policy H5 Threshold approach to applications
 Policy H15 Purpose-built student accommodation

Chapter 5

Policy S1 Developing London's social infrastructure

Chapter 6

Policy E1 Offices

Policy E2 Providing suitable business space

Policy E3 Affordable workspace

Policy E11 Skills and opportunities for all

Chapter 7

Policy HC1 Heritage conservation and growth

Policy HC3 Strategic and Local Views

Policy HC4 London View Management Framework

Chapter 8

Policy G1 Green infrastructure

Policy G5 Urban greening

Policy G6 Biodiversity and access to nature

Policy G7 Trees and woodlands

Chapter 9

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

Chapter 10

Policy T1 Strategic approach to transport

Policy T2 Healthy Streets

Policy T3 Transport capacity, connectivity and safeguarding

Policy T4 Assessing and mitigating transport impacts

Policy T5 Cycling

Policy T6 Car parking

Policy T6.5 Non-residential disabled persons parking

Policy T7 Deliveries, servicing and construction

Policy T9 Funding transport infrastructure through planning

Chapter 11

Policy DF1 Delivery of the Plan and Planning Obligations

Chapter 12

Policy M1 Monitoring

Southwark Plan 2022

ST1 Southwark's Development targets
 ST2 Southwark's Places
 SP1 Homes for all
 SP2 Southwark Together
 SP4 Green and inclusive economy
 SP5 Thriving neighbourhoods and tackling health equalities
 SP6 Climate Change
 AV.06 Elephant and Castle Area Vision
 P5 Student homes
 P8 Wheelchair accessible and adaptable housing
 P13 Design of places
 P14 Design quality
 P15 Residential design
 P16 Designing out crime
 P17 Tall buildings
 P18 Efficient use of land
 P21 Conservation of the historic environment and natural heritage
 P23 Archaeology
 P24 World Heritage Sites
 P28 Access to employment and training
 P30 Office and business development
 P31 Affordable workspace
 P35 Town and local centres
 P44 Broadband and digital infrastructure
 P45 Healthy developments
 P47 Community uses
 P48 Hot food takeaways
 P49 Public transport
 P50 Highways impacts
 P51 Walking
 P53 Cycling
 P54 Car Parking
 P55 Parking standards for disabled people and the mobility impaired
 P56 Protection of amenity
 P59 Green infrastructure
 P60 Biodiversity
 P61 Trees
 P62 Reducing waste
 P64 Contaminated land and hazardous substances
 P65 Improving air quality
 P66 Reducing noise pollution and enhancing soundscapes
 P67 Reducing water use
 P68 Reducing flood risk
 P69 Sustainability standards
 P70 Energy
 IP1 Infrastructure
 IP2 Transport infrastructure
 IP3 Community infrastructure levy (CIL) and Section 106 planning obligations
 IP6 Monitoring development
 IP7 Statement of Community Involvement
 NSP46 63-85 Newington Causeway.

Southwark SPDs/SPGs

Development Viability (2016)

Residential Design Standards (2011 with 2015 update)

S106 and CIL (2025)

S106 and CIL Addendum (2017)

Heritage (2021)

Appendix 3: Relevant Planning History

1. Site History

Ref No.	Decision/Date	Site address	Description
72/AP/1411	Granted 27.03.1972	65 Newington Causeway London Southwark	Change of use 65 Newington Causeway from works shop and storage to offices.
79/AP/0357	Granted 04.12.1979	Coburg House 63-67 Newington Causeway London Southwark SE1 6LS	Erection of a new office building (2740 sqm) and industrial (996 sqm) with carparking and servicing land
12/AP/1698	Granted 31.07.2012	Coburg House 63-67 Newington Causeway London	To install a new set of automatic double entry doors to the building's front entrance.

2. Surrounding Site History

Ref No.	Decision/Date	Site address	Description
21/AP/4297	Allowed on appeal 21.07.2022	Avonmouth House 6 Avonmouth Street London Southwark SE1 6NX	Demolition of existing building and structures and erection of a part 2, part 7, part 14, and part 16 storey plus basement development comprising 1,733sqm (GIA) of space for Class E employment use and/or community health hub and/or Class F1(a) education use and 233 purpose-built student residential rooms with associated amenity space and public realm works, car and cycle parking, and ancillary infrastructure.

23/AP/0527	Agreed 15.06.2023	Avonmouth House 6 Avonmouth Street London Southwark SE1 6NX	Non material amendment to permission granted on appeal ref. no. 21/AP/4297 dated 24/01/2023 for 'Demolition of existing building and structures and erection of a part 2, part 7, part 14, part 16 storey plus basement mixed-use development comprising 1733sqm (GIA) of space for Class E employment use and/or community health hub and/or Class F1(a) education use and 233 purpose-built student residential rooms with associated amenity space and public realm works, car and cycle parking, and ancillary infrastructure'. The amendment seeks to remove reference to the number of PBSA rooms in the description of development.
23/AP/0958	Granted 25.07.2023	6 Avonmouth Street London Southwark SE1 6NX	Variation of Conditions 2, 27 and 32 of Appeal decision ref. APP/A5840/W/22/3303205 (planning application ref: 21/AP/4297) (Demolition of existing building and structures and erection of a part 2, part 7, part 14, and part 16 storey plus basement development comprising 1,733sqm (GIA) of space for Class E employment use and/or community health hub and/or Class F1(a) education use and purpose-built student residential rooms with associated amenity space and public realm works, car and cycle parking, and ancillary infrastructure). Minor

			material amendment sought: Amendment to approved plans and rewording of conditions.
18/AP/0657	Granted 11.05.2020	Land At 19-21 And 23 Harper Road 325 Borough High Street And 1-5 And 7-11 Newington Causeway London SE1 6AW	Demolition of existing buildings and redevelopment to provide construction of a part 5, part 7, part 8 and part 13 building a mixed-use development comprising 328 hotel rooms (Class C1) 20 no. residential dwellings (Class C3), offices, workspace and workshops (Class B1), multifunctional community events space (Class B1/D1), retail use (Class A1/A2/A3), 4 no. car parking spaces together with access, cycle parking, hard and soft landscaping and other associated works incidental to the development.
23/AP/0479	Granted 06.02.2024	Land At 19-21 And 23 Harper Road 325 Borough High Street And 1-5 And 7-11 Newington Causeway London SE1 6AW	Demolition of existing buildings and redevelopment to provide a mixed-use development comprising purpose-built student residential rooms (Sui Generis), affordable residential dwellings (Use Class C3), employment floorspace (Use Class E(g)), together with access, cycle parking, hard and soft landscaping and other associated works.
24/AP/3621	Granted 17.06.2025	Borough Triangle Land And Site At 18-54 Newington Causeway	Phased mixed-use redevelopment of the site comprising: Demolition of all existing buildings/structures and site clearance, except 82 and (part) 83 Borough Road which are to be retained,

		69 Borough Road 82-83 Borough Road London Southwark SE1 6DR	<p>altered and refurbished for Flexible Commercial, Business and Service, and Learning and Non-Residential Institution Uses (Class E/F1 / F2(b));</p> <ul style="list-style-type: none"> - Construction of basement structure and vehicular access; - Construction of buildings to provide Dwellings (Class C3), Flexible Commercial, Business and Service and mixed food and drink and leisure uses (including drinking establishments with expanded food provision, hot food takeaways, live music performance venue and cinema) (Class E / Sui Generis) and public toilets; and - Provision of associated car and cycle parking, open space and landscaping, means of access and highway alterations, installation of plant and utilities and all other associated ancillary works incidental to the development.
19/AP/0750	Granted 31.01.2020	5-9 Rockingham Street And 2-4 Tiverton Street London SE1 6PF	Demolition of existing buildings and erection of a 21-storey building (max height 70.665m) with basement and associated roof plant to provide 6,042.3sqm (GIA) of new commercial floor space and redevelopment of 3 railway arches to provide 340.1sqm of flexible commercial space (A1,B1,D1,D2) with associated cycle parking storage, waste/recycling stores and new public realm.

22/AP/1068	Granted 10.04.2023	5-9 Rockingham Street And 2-4 Tiverton Street London SE1 6PF	Redevelopment of site to provide a 24 storey building plus basement consisting of purpose-built student accommodation (Sui Generis), and commercial uses (Use Class E) at ground floor, and the development of the associated railway arches to provide commercial space (Use Class E), plant, refuse and cycle storage, and associated access and public realm works.
------------	-----------------------	--	--

Appendix 4: Consultation undertaken

Site notice date: 22/01/2025

Press notice date: 13/03/2025

Case officer site visit date: 22/01/2025

Neighbour consultation letters sent: 22/01/2025

Internal services consulted

LBS Community Infrastructure Team
 LBS Building Control Division
 LBS Ecology Officer
 LBS Urban Forester
 LBS Transport Policy Team
 LBS Highways Development & Management
 LBS Archaeologist
 LBS Design And Conservation Team [Surgery Consultation]
 LBS Transport Policy Team
 LBS Archaeologist
 LBS Design And Conservation Team [Formal Consultation]
 LBS Local Economy
 LBS Ecology Officer
 LBS Highways Development & Management
 LBS Highways Licensing
 LBS Housing Regeneration And Delivery Division
 Flood Risk Management & Urban Drainage Team
 LBS Urban Forester
 LBS Waste Management Team
 LBS Planning Policy [Formal Consultation] - General
 LBS Archaeologist
 LBS Planning Policy [Formal Consultation] - General
 LBS CCTV - Public Space Surveillance
 LBS Network Developments Construction Management Plans
 LBS Environmental Protection Team
 LBS Public Health
 LBS Urban Forester

Statutory and non-statutory organisations

Environment Agency
 Greater London Authority
 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)
 Transport For London
 Transport For London
 Thames Water

City Of Westminster
 Arqiva
 NHS London Healthy Urban Development Unit
 UK Power Networks
 Civil Aviation Authority
 Historic England - Scheduled Ancient Monuments
 Elephant Amenity Network
 National Grid UK Transmission
 Fire And Emergency Department
 The Gardens Trust
 HSE Fire Risk Assessments
 Latin Elephant
 National Air Traffic Safeguarding Office
 Twentieth Century Society
 Transport For London
 Trinity Newington Residents' Association
 UK Power Networks
 The Georgian Group
 The Victorian Society

Neighbour and local groups consulted:

Flat 19 Pioneer Building 91 Newington Causeway	Arch 89 Tiverton Street London
Sixth Floor Lancaster House 70 Newington Causeway	Arch 88 Tiverton Street London
Flat 10 Balppa House 57 - 61 Newington Causeway	Office Rear Of 69 - 71 Newington Causeway London
Unit 1 Arches 84 And 85 Newington Court Newington Causeway	Flat 48 Ceramic Building 87B Newington Causeway
3C Office Third Floor 79 - 81 Borough Road London	Flat 44 Ceramic Building 87B Newington Causeway
3a.p03 Third Floor 79 - 81 Borough Road London	Flat 9 Ceramic Building 87A Newington Causeway
2d.p03 Second Floor 79 - 81 Borough Road London	Flat 7 Ceramic Building 87A Newington Causeway
2B-2C Office Second Floor 79 - 81 Borough Road London	Apartment 1510 251 Southwark Bridge Road London
1B Office First Floor 79 - 81 Borough Road London	Apartment 1201 251 Southwark Bridge Road London
1c.p03 First Floor 79 - 81 Borough Road London	Flat 40 Stephenson House Rockingham Estate Bath Terrace
1c.p02 First Floor 79 - 81 Borough Road London	Apartment 2201 251 Southwark Bridge Road London
1c.p01 First Floor 79 - 81 Borough Road London	Flat 3 29A Bath Terrace London
1b.p02 First Floor 79 - 81 Borough Road London	Flat 24 Stephenson House Rockingham Estate Bath Terrace
Sixth Floor 241 Southwark Bridge Road London	Flat 5 Telford House Rockingham Estate Tiverton Street
Un1t Gym 251 Southwark Bridge Road London	Flat 38 Pioneer Building 91 Newington Causeway
	Apartment 3502 251 Southwark Bridge Road London
	Flat 13 Rennie House Rockingham

Estate Bath Terrace
 Flat 7 Stephenson House Rockingham
 Estate Bath Terrace
 Apartment 1801 251 Southwark Bridge
 Road London
 Flat 27 Telford House Rockingham
 Estate Tiverton Street
 Flat 25 Telford House Rockingham
 Estate Tiverton Street
 Flat 19 Telford House Rockingham
 Estate Tiverton Street
 Flat 7 Rankine House Rockingham
 Estate Bath Terrace
 Flat 2 Pioneer Building 91 Newington
 Causeway
 Apartment 2203 251 Southwark Bridge
 Road London
 Apartment 2102 251 Southwark Bridge
 Road London
 Apartment 2003 251 Southwark Bridge
 Road London
 229 Southwark Bridge Road London
 Southwark
 Apartment 3802 251 Southwark Bridge
 Road London
 Apartment 3101 251 Southwark Bridge
 Road London
 Apartment 3006 251 Southwark Bridge
 Road London
 Flat 64 Stephenson House Rockingham
 Estate Bath Terrace
 Flat 38 Stephenson House Rockingham
 Estate Bath Terrace
 Apartment 1811 251 Southwark Bridge
 Road London
 Apartment 1803 251 Southwark Bridge
 Road London
 Apartment 1705 251 Southwark Bridge
 Road London
 87 Borough Road London Southwark
 Apartment 1309 251 Southwark Bridge
 Road London
 Apartment 805 251 Southwark Bridge
 Road London
 Apartment 802 251 Southwark Bridge
 Road London
 Apartment 3303 251 Southwark Bridge
 Road London
 Apartment 1105 251 Southwark Bridge
 Road London
 Flat 20 Rumford House Rockingham
 Estate Bath Terrace

Flat 5 Bath House Bath Terrace
 Flat 23 Bath House Bath Terrace
 Apartment 2603 251 Southwark Bridge
 Road London
 Flat 29 Stephenson House Rockingham
 Estate Bath Terrace
 Flat 22 Stephenson House Rockingham
 Estate Bath Terrace
 Flat 15 Fraser Court 1 Brockham Street
 Flat 7 Fraser Court 1 Brockham Street
 Crown Court Basement To Second
 Floors Sessions House Newington
 Causeway
 Flat 8 29A Bath Terrace London
 231 Southwark Bridge Road London
 Southwark
 49 - 51 Tiverton Street London
 Southwark
 Flat 13 Rumford House Rockingham
 Estate Bath Terrace
 Flat 7 Bath House Bath Terrace
 Flat 2 Bath House Bath Terrace
 Flat 7 Devonshire House Bath Terrace
 Flat 20 Devonshire House Bath Terrace
 Flat 13 Devonshire House Bath Terrace
 Flat 15 Newall House Rockingham
 Estate Harper Road
 Flat 28 Trinity House Bath Terrace
 Flat 22 Trinity House Bath Terrace
 Flat 8 Rumford House Rockingham
 Estate Bath Terrace
 Flat 6 Rumford House Rockingham
 Estate Bath Terrace
 26 Newington Causeway London
 Southwark
 Flat 77 Stephenson House Rockingham
 Estate Bath Terrace
 Flat 8 Fraser Court 1 Brockham Street
 Flat 4 Fraser Court 1 Brockham Street
 Flat 3 Fraser Court 1 Brockham Street
 Flat 1 Fraser Court 1 Brockham Street
 18 Brockham Street London Southwark
 Flat 3 Rankine House Rockingham
 Estate Bath Terrace
 Flat 35 Telford House Rockingham
 Estate Tiverton Street
 Flat 22 Telford House Rockingham
 Estate Tiverton Street
 Flat 14 Telford House Rockingham
 Estate Tiverton Street
 Flat 2 Stephenson House Rockingham
 Estate Bath Terrace

Flat 10 Stephenson House Rockingham Estate Bath Terrace	Flat 8 Pioneer Building 91 Newington Causeway
Flat 23 Rennie House Rockingham Estate Bath Terrace	Flat 3 Pioneer Building 91 Newington Causeway
Apartment 407 251 Southwark Bridge Road London	Flat 5 Balppa House 57 - 61 Newington Causeway
Flat 17 Rennie House Rockingham Estate Bath Terrace	86A Borough Road London Southwark
Apartment 3205 251 Southwark Bridge Road London	Flat 49 Ceramic Building 87B Newington Causeway
Apartment 3201 251 Southwark Bridge Road London	Unit 5 Newington Court Business Centre 64A Newington Causeway
Apartment 402 251 Southwark Bridge Road London	4b.p01 Fourth Floor 79 - 81 Borough Road London
Apartment 401 251 Southwark Bridge Road London	3d.p04 Third Floor 79 - 81 Borough Road London
Apartment 302 251 Southwark Bridge Road London	3d.p02 Third Floor 79 - 81 Borough Road London
Apartment 3010 251 Southwark Bridge Road London	3c.p01 Third Floor 79 - 81 Borough Road London
Apartment 3007 251 Southwark Bridge Road London	Flat 38 Telford House Rockingham Estate Tiverton Street
Apartment 2901 251 Southwark Bridge Road London	Apartment 3701 251 Southwark Bridge Road London
Apartment 2301 251 Southwark Bridge Road London	Flat 52 Stephenson House Rockingham Estate Bath Terrace
Apartment 1903 251 Southwark Bridge Road London	Flat 41 Stephenson House Rockingham Estate Bath Terrace
Apartment 1711 251 Southwark Bridge Road London	Apartment 1406 251 Southwark Bridge Road London
Apartment 1603 251 Southwark Bridge Road London	Apartment 702 251 Southwark Bridge Road London
Apartment 1506 251 Southwark Bridge Road London	Apartment 609 251 Southwark Bridge Road London
Apartment 1210 251 Southwark Bridge Road London	Apartment 604 251 Southwark Bridge Road London
Apartment 1108 251 Southwark Bridge Road London	Apartment 506 251 Southwark Bridge Road London
Apartment 1101 251 Southwark Bridge Road London	Apartment 3407 251 Southwark Bridge Road London
243 Southwark Bridge Road London Southwark	Apartment 2810 251 Southwark Bridge Road London
Apartment 3604 251 Southwark Bridge Road London	Apartment 2802 251 Southwark Bridge Road London
Apartment 3601 251 Southwark Bridge Road London	Apartment 303 251 Southwark Bridge Road London
Flat 7 29A Bath Terrace London	Apartment 2410 251 Southwark Bridge Road London
Flat 1 29A Bath Terrace London	Apartment 2405 251 Southwark Bridge Road London
Unit 7 Second Floor Lancaster House 70 Newington Causeway	Flat 25 Stephenson House Rockingham Estate Bath Terrace
Flat 30 Pioneer Building 91 Newington Causeway	Flat 6 Rennie House Rockingham Estate

Bath Terrace
 Flat 24 Rennie House Rockingham
 Estate Bath Terrace
 Flat 29 Pioneer Building 91 Newington
 Causeway
 Flat 24 Pioneer Building 91 Newington
 Causeway
 69 Borough Road London Southwark
 Third Floor Coburg House 63 - 67
 Newington Causeway
 Excluding Second Fourth And Sixth
 Floor Lancaster House 70 Newington
 Causeway
 Ground Floor 44 - 46 Newington
 Causeway London
 Flat 22 Rumford House Rockingham
 Estate Bath Terrace
 Flat 6 Bath House Bath Terrace
 Flat 21 Bath House Bath Terrace
 Flat 15 Bath House Bath Terrace
 Flat 14 Bath House Bath Terrace
 Flat 3 Devonshire House Bath Terrace
 Flat 16 Devonshire House Bath Terrace
 Flat 4 Newall House Rockingham Estate
 Harper Road
 Flat 13 Newall House Rockingham
 Estate Harper Road
 Flat 6 Trinity House Bath Terrace
 Flat 23 Trinity House Bath Terrace
 Flat 16 Trinity House Bath Terrace
 Flat 12 Trinity House Bath Terrace
 Flat 10 Trinity House Bath Terrace
 Flat 72 Stephenson House Rockingham
 Estate Bath Terrace
 Flat 63 Stephenson House Rockingham
 Estate Bath Terrace
 Flat 51 Stephenson House Rockingham
 Estate Bath Terrace
 Flat 46 Stephenson House Rockingham
 Estate Bath Terrace
 Flat 36 Stephenson House Rockingham
 Estate Bath Terrace
 Flat 9 Fraser Court 1 Brockham Street
 Flat 10 Rennie House Rockingham
 Estate Bath Terrace
 Flat 9 Telford House Rockingham Estate
 Tiverton Street
 Apartment 410 251 Southwark Bridge
 Road London
 Flat 18 Stephenson House Rockingham
 Estate Bath Terrace
 Flat 21 Rennie House Rockingham

Estate Bath Terrace
 Apartment 3306 251 Southwark Bridge
 Road London
 Apartment 3105 251 Southwark Bridge
 Road London
 Apartment 2902 251 Southwark Bridge
 Road London
 Apartment 2804 251 Southwark Bridge
 Road London
 Apartment 2709 251 Southwark Bridge
 Road London
 Apartment 2503 251 Southwark Bridge
 Road London
 Apartment 2408 251 Southwark Bridge
 Road London
 Apartment 2404 251 Southwark Bridge
 Road London
 Apartment 2403 251 Southwark Bridge
 Road London
 Apartment 2401 251 Southwark Bridge
 Road London
 Apartment 2101 251 Southwark Bridge
 Road London
 Apartment 2007 251 Southwark Bridge
 Road London
 Apartment 1906 251 Southwark Bridge
 Road London
 Apartment 1403 251 Southwark Bridge
 Road London
 Apartment 1209 251 Southwark Bridge
 Road London
 Apartment 1204 251 Southwark Bridge
 Road London
 Apartment 1202 251 Southwark Bridge
 Road London
 Apartment 1007 251 Southwark Bridge
 Road London
 Apartment 907 251 Southwark Bridge
 Road London
 Apartment 3403 251 Southwark Bridge
 Road London
 Apartment 904 251 Southwark Bridge
 Road London
 Apartment 902 251 Southwark Bridge
 Road London
 Flat 4 29A Bath Terrace London
 Flat 26 Pioneer Building 91 Newington
 Causeway
 Flat 6 Pioneer Building 91 Newington
 Causeway
 Third Floor Lancaster House 70
 Newington Causeway

Unit 3 Arches 80 And 81 Newington
Court Business Centre 64 Newington
Causeway
Unit 4 Arches 78 And 79 Newington
Court Newington Causeway
Flat B 2 Avonmouth Street London
77 - 85 Newington Causeway London
Southwark
89 Newington Causeway London
Southwark
3c.p02 Third Floor 79 - 81 Borough Road
London
2d.p02 Second Floor 79 - 81 Borough
Road London
2d.p01 Second Floor 79 - 81 Borough
Road London
2c.p02 Second Floor 79 - 81 Borough
Road London
1d.p02 First Floor 79 - 81 Borough Road
London
1b.p01 First Floor 79 - 81 Borough Road
London
Suite 304 Third Floor 241 Southwark
Bridge Road London
Suite 303 Third Floor 241 Southwark
Bridge Road London
Suite 108 First Floor 241 Southwark
Bridge Road London
Suite 101 First Floor 241 Southwark
Bridge Road London
Ground Floor 241 Southwark Bridge
Road London
Second Floor 251 Southwark Bridge
Road London
Flat 33 Ceramic Building 87B Newington
Causeway
Apartment 1112 251 Southwark Bridge
Road London
Apartment 2908 251 Southwark Bridge
Road London
Apartment 3206 251 Southwark Bridge
Road London
Apartment 3203 251 Southwark Bridge
Road London
Apartment 1110 251 Southwark Bridge
Road London
Apartment 1102 251 Southwark Bridge
Road London
Apartment 501 251 Southwark Bridge
Road London
Apartment 406 251 Southwark Bridge
Road London

Apartment 2702 251 Southwark Bridge
Road London
Flat 14 Rumford House Rockingham
Estate Bath Terrace
Flat 2 Rennie House Rockingham Estate
Bath Terrace
Unit 3 Second Floor Lancaster House 70
Newington Causeway
6 Brockham Street London Southwark
14 Brockham Street London Southwark
9 Rockingham Street London Southwark
Flat 11 Rumford House Rockingham
Estate Bath Terrace
Flat 22 Bath House Bath Terrace
Flat 15 Devonshire House Bath Terrace
Flat 22 Newall House Rockingham
Estate Harper Road
Flat 21 Newall House Rockingham
Estate Harper Road
Flat 65 Stephenson House Rockingham
Estate Bath Terrace
Flat 34 Stephenson House Rockingham
Estate Bath Terrace
Flat 3 Stephenson House Rockingham
Estate Bath Terrace
Apartment 2 Rutherford Lodge 7
Brockham Street
Flat 11 Fraser Court 1 Brockham Street
Flat 6 Fraser Court 1 Brockham Street
Flat 1 Rennie House Rockingham Estate
Bath Terrace
Flat 8 Rankine House Rockingham
Estate Bath Terrace
Flat 24 Rankine House Rockingham
Estate Bath Terrace
Flat 11 Rankine House Rockingham
Estate Bath Terrace
Flat 13 Stephenson House Rockingham
Estate Bath Terrace
Flat 19 Rennie House Rockingham
Estate Bath Terrace
Apartment 806 251 Southwark Bridge
Road London
Apartment 3301 251 Southwark Bridge
Road London
Apartment 705 251 Southwark Bridge
Road London
Apartment 603 251 Southwark Bridge
Road London
Apartment 404 251 Southwark Bridge
Road London
Apartment 3104 251 Southwark Bridge

Road London
 Apartment 2803 251 Southwark Bridge
 Road London
 Apartment 2704 251 Southwark Bridge
 Road London
 Apartment 2501 251 Southwark Bridge
 Road London
 Apartment 2005 251 Southwark Bridge
 Road London
 Apartment 1901 251 Southwark Bridge
 Road London
 Apartment 1712 251 Southwark Bridge
 Road London
 Apartment 1709 251 Southwark Bridge
 Road London
 Apartment 1608 251 Southwark Bridge
 Road London
 Apartment 1508 251 Southwark Bridge
 Road London
 Flat 31 Ceramic Building 87B Newington
 Causeway
 Flat 29 Ceramic Building 87B Newington
 Causeway
 Flat 23 Ceramic Building 87B Newington
 Causeway
 Flat 22 Ceramic Building 87B Newington
 Causeway
 10 Dickens Square London Southwark
 Apartment 1005 251 Southwark Bridge
 Road London
 Apartment 508 251 Southwark Bridge
 Road London
 Flat 16 Newall House Rockingham
 Estate Harper Road
 Flat 26 Trinity House Bath Terrace
 12 Brockham Street London Southwark
 Flat 2 Rumford House Rockingham
 Estate Bath Terrace
 Flat 9 Devonshire House Bath Terrace
 Apartment 3005 251 Southwark Bridge
 Road London
 Flat 16 Bath House Bath Terrace
 Apartment 2708 251 Southwark Bridge
 Road London
 3 Brockham Street London Southwark
 Flat 25 Devonshire House Bath Terrace
 Flat 23 Telford House Rockingham
 Estate Tiverton Street
 Apartment 2307 251 Southwark Bridge
 Road London
 Flat 31 Stephenson House Rockingham
 Estate Bath Terrace

Apartment 3603 251 Southwark Bridge
 Road London
 Apartment 2402 251 Southwark Bridge
 Road London
 Flat 12 Rankine House Rockingham
 Estate Bath Terrace
 Flat 14 Stephenson House Rockingham
 Estate Bath Terrace
 Flat 33 Telford House Rockingham
 Estate Tiverton Street
 Flat 20 Newall House Rockingham
 Estate Harper Road
 Flat 11 Rennie House Rockingham
 Estate Bath Terrace
 Flat 68 Stephenson House Rockingham
 Estate Bath Terrace
 Apartment 2302 251 Southwark Bridge
 Road London
 Apartment 2109 251 Southwark Bridge
 Road London
 Apartment 2006 251 Southwark Bridge
 Road London
 Apartment 1907 251 Southwark Bridge
 Road London
 Flat 23 Rankine House Rockingham
 Estate Bath Terrace
 Flat 14 Rankine House Rockingham
 Estate Bath Terrace
 Flat 8 Trinity House Bath Terrace
 Flat 5 Stephenson House Rockingham
 Estate Bath Terrace
 Flat 35 Stephenson House Rockingham
 Estate Bath Terrace
 Apartment 1710 251 Southwark Bridge
 Road London
 Apartment 1607 251 Southwark Bridge
 Road London
 Apartment 1604 251 Southwark Bridge
 Road London
 Apartment 707 251 Southwark Bridge
 Road London
 Apartment 606 251 Southwark Bridge
 Road London
 Apartment 601 251 Southwark Bridge
 Road London
 Apartment 3506 251 Southwark Bridge
 Road London
 Flat 14 Trinity House Bath Terrace
 Apartment 2705 251 Southwark Bridge
 Road London
 Apartment 3108 251 Southwark Bridge
 Road London

Apartment 1305 251 Southwark Bridge
 Road London
 Apartment 1404 251 Southwark Bridge
 Road London
 Apartment 1312 251 Southwark Bridge
 Road London
 Apartment 1310 251 Southwark Bridge
 Road London
 Apartment 1103 251 Southwark Bridge
 Road London
 Apartment 1003 251 Southwark Bridge
 Road London
 Apartment 910 251 Southwark Bridge
 Road London
 Apartment 3602 251 Southwark Bridge
 Road London
 Apartment 3406 251 Southwark Bridge
 Road London
 Apartment 3405 251 Southwark Bridge
 Road London
 Apartment 809 251 Southwark Bridge
 Road London
 Flat 36 Pioneer Building 91 Newington
 Causeway
 Flat 23 Pioneer Building 91 Newington
 Causeway
 Public Lounge Sessions House
 Newington Causeway
 Unit 2 5 - 9 Rockingham Street London
 Railway Arch 73 Rear Of 229 Southwark
 Bridge Road London
 Flat 2 Balppa House 57 - 61 Newington
 Causeway
 86 Borough Road London Southwark
 Unit 1 Newington Court Business Centre
 64A Newington Causeway
 2 Avonmouth Street London Southwark
 Office 4B Fourth Floor 79 - 81 Borough
 Road London
 4a.p03 Fourth Floor 79 - 81 Borough
 Road London
 93 Newington Causeway London
 Southwark
 3c.3.1 Third Floor 79 - 81 Borough Road
 London
 2c.p03 Second Floor 79 - 81 Borough
 Road London
 2b.2.3 Second Floor 79 - 81 Borough
 Road London
 1D Office First Floor 79 - 81 Borough
 Road London
 1d.p03 First Floor 79 - 81 Borough Road

London
 82 Borough Road London Southwark
 Mercato Metropolitano 42 Newington
 Causeway London
 Flat 28 Ceramic Building 87B Newington
 Causeway
 Flat 20 Ceramic Building 87B Newington
 Causeway
 Flat 18 Ceramic Building 87B Newington
 Causeway
 Flat 12 Ceramic Building 87A Newington
 Causeway
 Flat 6 Ceramic Building 87A Newington
 Causeway
 Flat 2 Ceramic Building 87A Newington
 Causeway
 Flat 12 Fraser Court 1 Brockham Street
 Flat 9 Rumford House Rockingham
 Estate Bath Terrace
 Flat 18 Devonshire House Bath Terrace
 Apartment 3505 251 Southwark Bridge
 Road London
 Apartment 3207 251 Southwark Bridge
 Road London
 Apartment 1909 251 Southwark Bridge
 Road London
 Apartment 1708 251 Southwark Bridge
 Road London
 Flat 14 Rennie House Rockingham
 Estate Bath Terrace
 Apartment 1302 251 Southwark Bridge
 Road London
 Apartment 808 251 Southwark Bridge
 Road London
 Apartment 1001 251 Southwark Bridge
 Road London
 Flat 20 Trinity House Bath Terrace
 Apartment 2610 251 Southwark Bridge
 Road London
 Apartment 1011 251 Southwark Bridge
 Road London
 Flat 16 Rumford House Rockingham
 Estate Bath Terrace
 Flat 13 Bath House Bath Terrace
 Apartment 2505 251 Southwark Bridge
 Road London
 Flat 13 Fraser Court 1 Brockham Street
 Flat 32 Pioneer Building 91 Newington
 Causeway
 Flat 27 Pioneer Building 91 Newington
 Causeway
 Flat 4 Balppa House 57 - 61 Newington

Causeway	Apartment 301 251 Southwark Bridge
Unit 1 Second Floor Lancaster House 70	Road London
Newington Causeway	Apartment 3002 251 Southwark Bridge
49 Harper Road London Southwark	Road London
103 Gaunt Street London Southwark	Apartment 2706 251 Southwark Bridge
Living Accommodation 40 - 42	Road London
Newington Causeway London	Apartment 2606 251 Southwark Bridge
Railway Arch 75 231 - 233 Southwark	Road London
Bridge Road London	Apartment 2604 251 Southwark Bridge
57 Harper Road London Southwark	Road London
Lancaster House 70 Newington	Apartment 2207 251 Southwark Bridge
Causeway London	Road London
Flat 12 Bath House Bath Terrace	Apartment 2202 251 Southwark Bridge
Flat 1 Bath House Bath Terrace	Road London
Flat 23 Devonshire House Bath Terrace	Flat 17 Devonshire House Bath Terrace
Flat 22 Devonshire House Bath Terrace	Flat 29 Trinity House Bath Terrace
Flat 7 Trinity House Bath Terrace	Flat 3 Telford House Rockingham Estate
Flat 4 Trinity House Bath Terrace	Tiverton Street
Flat 15 Trinity House Bath Terrace	Flat 20 Pioneer Building 91 Newington
Flat 13 Trinity House Bath Terrace	Causeway
38 Newington Causeway London	Flat 66 Stephenson House Rockingham
Southwark	Estate Bath Terrace
Flat 60 Stephenson House Rockingham	Apartment 2107 251 Southwark Bridge
Estate Bath Terrace	Road London
Flat 56 Stephenson House Rockingham	Flat 21 Rankine House Rockingham
Estate Bath Terrace	Estate Bath Terrace
Flat 37 Stephenson House Rockingham	Flat 12 Newall House Rockingham
Estate Bath Terrace	Estate Harper Road
Flat 8 Stephenson House Rockingham	Apartment 3008 251 Southwark Bridge
Estate Bath Terrace	Road London
Apartment 3 Rutherford Lodge 7	Flat 50 Stephenson House Rockingham
Brockham Street	Estate Bath Terrace
Flat 18 Rankine House Rockingham	Apartment 1409 251 Southwark Bridge
Estate Bath Terrace	Road London
Flat 1 Rankine House Rockingham	Apartment 1311 251 Southwark Bridge
Estate Bath Terrace	Road London
Flat 42 Telford House Rockingham	Apartment 901 251 Southwark Bridge
Estate Tiverton Street	Road London
Flat 39 Telford House Rockingham	Flat 11 Trinity House Bath Terrace
Estate Tiverton Street	Apartment 2807 251 Southwark Bridge
Flat 32 Telford House Rockingham	Road London
Estate Tiverton Street	Apartment 2502 251 Southwark Bridge
Flat 5 Rennie House Rockingham Estate	Road London
Bath Terrace	Flat 27 Stephenson House Rockingham
Flat 4 Rennie House Rockingham Estate	Estate Bath Terrace
Bath Terrace	Flat 20 Stephenson House Rockingham
Apartment 3304 251 Southwark Bridge	Estate Bath Terrace
Road London	Flat 12 Stephenson House Rockingham
Apartment 602 251 Southwark Bridge	Estate Bath Terrace
Road London	Flat 3 Rennie House Rockingham Estate
Apartment 507 251 Southwark Bridge	Bath Terrace
Road London	Flat 10 Fraser Court 1 Brockham Street

Basement To Seventh Floors Eileen
House 80 - 94 Newington Causeway
Second Floor 44 - 46 Newington
Causeway London
Flat 5 29A Bath Terrace London
Flat 6 Balppa House 57 - 61 Newington
Causeway
Flat 35A Stephenson House
Rockingham Estate Bath Terrace
237 Southwark Bridge Road London
Southwark
Flat 3 Rumford House Rockingham
Estate Bath Terrace
Flat 24 Rumford House Rockingham
Estate Bath Terrace
Flat 17 Rumford House Rockingham
Estate Bath Terrace
Flat 18 Newall House Rockingham
Estate Harper Road
Flat 10 Newall House Rockingham
Estate Harper Road
Flat 3 Trinity House Bath Terrace
Flat 2 Trinity House Bath Terrace
82 Newington Causeway London
Southwark
Flat 11 Devonshire House Bath Terrace
Flat 76 Stephenson House Rockingham
Estate Bath Terrace
Flat 70 Stephenson House Rockingham
Estate Bath Terrace
Flat 53 Stephenson House Rockingham
Estate Bath Terrace
Flat 32 Stephenson House Rockingham
Estate Bath Terrace
5 Brockham Street London Southwark
16 Brockham Street London Southwark
Flat 28 Telford House Rockingham
Estate Tiverton Street
Flat 2 Telford House Rockingham Estate
Tiverton Street
Flat 20 Rennie House Rockingham
Estate Bath Terrace
Apartment 3401 251 Southwark Bridge
Road London
Apartment 1810 251 Southwark Bridge
Road London
Apartment 2001 251 Southwark Bridge
Road London
Apartment 1908 251 Southwark Bridge
Road London
Apartment 1611 251 Southwark Bridge
Road London

Apartment 1606 251 Southwark Bridge
Road London
Apartment 1505 251 Southwark Bridge
Road London
Apartment 1503 251 Southwark Bridge
Road London
Apartment 1407 251 Southwark Bridge
Road London
Apartment 1308 251 Southwark Bridge
Road London
Apartment 1212 251 Southwark Bridge
Road London
Apartment 3408 251 Southwark Bridge
Road London
Unit 4 Second Floor Lancaster House 70
Newington Causeway
Flat 21 Pioneer Building 91 Newington
Causeway
Flat 18 Pioneer Building 91 Newington
Causeway
Flat 1 Pioneer Building 91 Newington
Causeway
First Floor 44 - 46 Newington Causeway
London
1 Tiverton Street London Southwark
Unit 9 Newington Court Business Centre
64A Newington Causeway
Unit 2 To 3 Newington Court Business
Centre 64A Newington Causeway
Flat C 2 Avonmouth Street London
4a.p01 Fourth Floor 79 - 81 Borough
Road London
3d.p03 Third Floor 79 - 81 Borough
Road London
3b.p03 Third Floor 79 - 81 Borough
Road London
3b.p02 Third Floor 79 - 81 Borough
Road London
3a.p02 Third Floor 79 - 81 Borough
Road London
2d.p04 Second Floor 79 - 81 Borough
Road London
2c.p01 Second Floor 79 - 81 Borough
Road London
1a.1.4 First Floor 79 - 81 Borough Road
London
Suite 305 Third Floor 241 Southwark
Bridge Road London
Suite 107 First Floor 241 Southwark
Bridge Road London
Suite 103 First Floor 241 Southwark
Bridge Road London

Fnt Building 69 - 71 Newington
 Causeway London
 29 Bath Terrace London Southwark
 85 Borough Road London Southwark
 Flat 39 Ceramic Building 87B Newington
 Causeway
 Flat 27 Ceramic Building 87B Newington
 Causeway
 Flat 11 Ceramic Building 87A Newington
 Causeway
 Flat 1 Ceramic Building 87A Newington
 Causeway
 Flat 26 Telford House Rockingham
 Estate Tiverton Street
 Apartment 1704 251 Southwark Bridge
 Road London
 Basement Coburg House 63 - 67
 Newington Causeway
 Apartment 706 251 Southwark Bridge
 Road London
 Flat 9 Balppa House 57 - 61 Newington
 Causeway
 Flat 23 Newall House Rockingham
 Estate Harper Road
 Apartment 608 251 Southwark Bridge
 Road London
 Apartment 409 251 Southwark Bridge
 Road London
 Flat 42 Stephenson House Rockingham
 Estate Bath Terrace
 Apartment 701 251 Southwark Bridge
 Road London
 Apartment 3307 251 Southwark Bridge
 Road London
 Apartment 803 251 Southwark Bridge
 Road London
 Apartment 708 251 Southwark Bridge
 Road London
 Apartment 610 251 Southwark Bridge
 Road London
 Apartment 607 251 Southwark Bridge
 Road London
 Apartment 502 251 Southwark Bridge
 Road London
 Apartment 3102 251 Southwark Bridge
 Road London
 Apartment 2806 251 Southwark Bridge
 Road London
 Apartment 2801 251 Southwark Bridge
 Road London
 Apartment 2406 251 Southwark Bridge
 Road London

Apartment 2308 251 Southwark Bridge
 Road London
 Apartment 2108 251 Southwark Bridge
 Road London
 Apartment 2106 251 Southwark Bridge
 Road London
 Apartment 1905 251 Southwark Bridge
 Road London
 Apartment 1808 251 Southwark Bridge
 Road London
 Apartment 1804 251 Southwark Bridge
 Road London
 Apartment 1802 251 Southwark Bridge
 Road London
 Apartment 1706 251 Southwark Bridge
 Road London
 Apartment 1703 251 Southwark Bridge
 Road London
 Apartment 1701 251 Southwark Bridge
 Road London
 Apartment 1501 251 Southwark Bridge
 Road London
 Apartment 1410 251 Southwark Bridge
 Road London
 Apartment 1405 251 Southwark Bridge
 Road London
 Apartment 1111 251 Southwark Bridge
 Road London
 Apartment 1010 251 Southwark Bridge
 Road London
 Apartment 1008 251 Southwark Bridge
 Road London
 Apartment 3801 251 Southwark Bridge
 Road London
 Flat 11 Pioneer Building 91 Newington
 Causeway
 Maisonette Second And Third Floor 38
 Newington Causeway London
 Balppa House 57 - 61 Newington
 Causeway London
 3c.p03 Third Floor 79 - 81 Borough Road
 London
 3b.p01 Third Floor 79 - 81 Borough
 Road London
 2b.p02 Second Floor 79 - 81 Borough
 Road London
 2b.2.2 Second Floor 79 - 81 Borough
 Road London
 1d.p04 First Floor 79 - 81 Borough Road
 London
 1a.p02 First Floor 79 - 81 Borough Road
 London

1a.1.5 First Floor 79 - 81 Borough Road London	8 Brockham Street London Southwark
Suite 302 Third Floor 241 Southwark Bridge Road London	Apartment 3202 251 Southwark Bridge Road London
Suite 301 Third Floor 241 Southwark Bridge Road London	Apartment 2504 251 Southwark Bridge Road London
Flat 47 Ceramic Building 87B Newington Causeway	Apartment 2710 251 Southwark Bridge Road London
Flat 34 Ceramic Building 87B Newington Causeway	Apartment 1511 251 Southwark Bridge Road London
Flat 26 Ceramic Building 87B Newington Causeway	Flat 11 Newall House Rockingham Estate Harper Road
Flat 17 Ceramic Building 87B Newington Causeway	Flat 36 Telford House Rockingham Estate Tiverton Street
Flat 15 Ceramic Building 87A Newington Causeway	Flat 20 Telford House Rockingham Estate Tiverton Street
Flat 13 Ceramic Building 87A Newington Causeway	Flat 8 Newall House Rockingham Estate Harper Road
42A Tarn Street London Southwark	Flat 19 Newall House Rockingham Estate Harper Road
Flat 23 Rumford House Rockingham Estate Bath Terrace	Flat 17 Newall House Rockingham Estate Harper Road
Apartment 908 251 Southwark Bridge Road London	Flat 5 Pioneer Building 91 Newington Causeway
Apartment 2009 251 Southwark Bridge Road London	Flat 26 Devonshire House Bath Terrace
Flat 18 Bath House Bath Terrace	Flat 1 Newall House Rockingham Estate Harper Road
Apartment 905 251 Southwark Bridge Road London	Flat 5 Trinity House Bath Terrace
Flat 15 Telford House Rockingham Estate Tiverton Street	Flat 27 Trinity House Bath Terrace
Flat 7 Pioneer Building 91 Newington Causeway	Flat 48 Stephenson House Rockingham Estate Bath Terrace
Flat 75 Stephenson House Rockingham Estate Bath Terrace	Flat 45 Stephenson House Rockingham Estate Bath Terrace
Flat 7 Telford House Rockingham Estate Tiverton Street	Apartment 1612 251 Southwark Bridge Road London
Flat 9 Rennie House Rockingham Estate Bath Terrace	Apartment 1609 251 Southwark Bridge Road London
Flat 12 Rennie House Rockingham Estate Bath Terrace	Apartment 1602 251 Southwark Bridge Road London
Apartment 304 251 Southwark Bridge Road London	Apartment 1402 251 Southwark Bridge Road London
Flat 4 Pioneer Building 91 Newington Causeway	Flat 7 Rumford House Rockingham Estate Bath Terrace
4 Brockham Street London Southwark	Apartment 3404 251 Southwark Bridge Road London
Apartment 2808 251 Southwark Bridge Road London	Apartment 3106 251 Southwark Bridge Road London
Apartment 2309 251 Southwark Bridge Road London	Apartment 2508 251 Southwark Bridge Road London
55 Harper Road London Southwark	Apartment 2310 251 Southwark Bridge Road London
Apartment 3402 251 Southwark Bridge Road London	Flat 22 Rennie House Rockingham Estate Bath Terrace

Flat 18 Rennie House Rockingham
 Estate Bath Terrace
 Flat 15 Rennie House Rockingham
 Estate Bath Terrace
 Apartment 2010 251 Southwark Bridge
 Road London
 Flat 22 Pioneer Building 91 Newington
 Causeway
 2 - 4 Tiverton Street London Southwark
 Arch 88 91A Newington Causeway
 London
 Flat 2 29A Bath Terrace London
 Flat 1 Balppa House 57 - 61 Newington
 Causeway
 Flat 46A Stephenson House
 Rockingham Estate Bath Terrace
 Arch 91 Tiverton Street London
 Suite 104 First Floor 241 Southwark
 Bridge Road London
 Fourth Floor 241 Southwark Bridge Road
 London
 Kiosk 3A Mercato Metropolitano 42
 Newington Causeway
 Arch 87 Tiverton Street London
 Flat 46 Ceramic Building 87B Newington
 Causeway
 Flat 42 Ceramic Building 87B Newington
 Causeway
 Flat 37 Ceramic Building 87B Newington
 Causeway
 Flat 36 Ceramic Building 87B Newington
 Causeway
 Flat 35 Ceramic Building 87B Newington
 Causeway
 Flat 25 Ceramic Building 87B Newington
 Causeway
 Flat 3 Ceramic Building 87A Newington
 Causeway
 Apartment 1812 251 Southwark Bridge
 Road London
 Apartment 1307 251 Southwark Bridge
 Road London
 Flat 26 Stephenson House Rockingham
 Estate Bath Terrace
 Baitul Aziz Mosque 1 Dickens Square
 London
 Railway Arch 76 235 - 237 Southwark
 Bridge Road London
 18 Newington Causeway London
 Southwark
 Flat 67 Stephenson House Rockingham
 Estate Bath Terrace

Flat 13 Rankine House Rockingham
 Estate Bath Terrace
 Flat 21 Telford House Rockingham
 Estate Tiverton Street
 Flat 16 Pioneer Building 91 Newington
 Causeway
 Flat 21 Trinity House Bath Terrace
 Flat 78 Stephenson House Rockingham
 Estate Bath Terrace
 Apartment 1211 251 Southwark Bridge
 Road London
 Flat 57 Stephenson House Rockingham
 Estate Bath Terrace
 Apartment 1104 251 Southwark Bridge
 Road London
 Apartment 2805 251 Southwark Bridge
 Road London
 Apartment 1 Rutherford Lodge 7
 Brockham Street
 Apartment 2008 251 Southwark Bridge
 Road London
 Flat 17 Telford House Rockingham
 Estate Tiverton Street
 Flat 9 Rankine House Rockingham
 Estate Bath Terrace
 Flat 10 Pioneer Building 91 Newington
 Causeway
 Flat 19 Devonshire House Bath Terrace
 Apartment 2104 251 Southwark Bridge
 Road London
 Apartment 903 251 Southwark Bridge
 Road London
 Flat 41 Telford House Rockingham
 Estate Tiverton Street
 2b.p03 Second Floor 79 - 81 Borough
 Road London
 2b.2.1 Second Floor 79 - 81 Borough
 Road London
 2A Office Second Floor 79 - 81 Borough
 Road London
 1d.p01 First Floor 79 - 81 Borough Road
 London
 1b.1.12 First Floor 79 - 81 Borough Road
 London
 1a.p01 First Floor 79 - 81 Borough Road
 London
 Suite 306 Third Floor 241 Southwark
 Bridge Road London
 Suite 106 First Floor 241 Southwark
 Bridge Road London
 Suite 105 First Floor 241 Southwark
 Bridge Road London

Flat 19 Rankine House Rockingham
 Estate Bath Terrace
 Flat 10 Rankine House Rockingham
 Estate Bath Terrace
 Flat 8 Telford House Rockingham Estate
 Tiverton Street
 Flat 4 Telford House Rockingham Estate
 Tiverton Street
 Jury Lounge Sessions House Newington
 Causeway
 Flat 55 Stephenson House Rockingham
 Estate Bath Terrace
 Apartment 1806 251 Southwark Bridge
 Road London
 Apartment 1702 251 Southwark Bridge
 Road London
 Apartment 1504 251 Southwark Bridge
 Road London
 Apartment 2905 251 Southwark Bridge
 Road London
 Apartment 2903 251 Southwark Bridge
 Road London
 Apartment 3305 251 Southwark Bridge
 Road London
 Apartment 1107 251 Southwark Bridge
 Road London
 Apartment 1006 251 Southwark Bridge
 Road London
 Apartment 1004 251 Southwark Bridge
 Road London
 Flat 25 Rumford House Rockingham
 Estate Bath Terrace
 Apartment 408 251 Southwark Bridge
 Road London
 Apartment 403 251 Southwark Bridge
 Road London
 Apartment 305 251 Southwark Bridge
 Road London
 Flat 12 Rumford House Rockingham
 Estate Bath Terrace
 Flat 1 Rumford House Rockingham
 Estate Bath Terrace
 Flat 10 Bath House Bath Terrace
 Apartment 2407 251 Southwark Bridge
 Road London
 Apartment 2304 251 Southwark Bridge
 Road London
 Flat 1 Stephenson House Rockingham
 Estate Bath Terrace
 Apartment 2210 251 Southwark Bridge
 Road London
 Flat 8 Devonshire House Bath Terrace

5 Gaunt Street London Southwark
 Unit 5 Second Floor Lancaster House 70
 Newington Causeway
 20 - 22 Newington Causeway London
 Southwark
 Flat 8 Balppa House 57 - 61 Newington
 Causeway
 48 - 54 Newington Causeway London
 Southwark
 Flat 34A Telford House Rockingham
 Estate Tiverton Street
 73 - 75 Newington Causeway London
 Southwark
 59 Harper Road London Southwark
 101 Newington Causeway London
 Southwark
 Flat 21 Rumford House Rockingham
 Estate Bath Terrace
 Flat 17 Bath House Bath Terrace
 Flat 11 Bath House Bath Terrace
 Flat 28 Devonshire House Bath Terrace
 Flat 24 Newall House Rockingham
 Estate Harper Road
 Flat 25 Trinity House Bath Terrace
 Flat 18 Trinity House Bath Terrace
 Flat 12 Devonshire House Bath Terrace
 Flat 74 Stephenson House Rockingham
 Estate Bath Terrace
 Flat 18 Rumford House Rockingham
 Estate Bath Terrace
 6 - 8 Tiverton Street London Southwark
 53 Harper Road London Southwark
 Flat 10 Rumford House Rockingham
 Estate Bath Terrace
 Flat 2 Devonshire House Bath Terrace
 Flat 9 Newall House Rockingham Estate
 Harper Road
 Flat 7 Newall House Rockingham Estate
 Harper Road
 Flat 6 Newall House Rockingham Estate
 Harper Road
 Flat 9 Trinity House Bath Terrace
 Flat 4 Rumford House Rockingham
 Estate Bath Terrace
 10 Brockham Street London Southwark
 Flat 58 Stephenson House Rockingham
 Estate Bath Terrace
 Flat 47 Stephenson House Rockingham
 Estate Bath Terrace
 Flat 6 Stephenson House Rockingham
 Estate Bath Terrace
 83 Borough Road London Southwark

Flat 6 Rankine House Rockingham
 Estate Bath Terrace
 Flat 22 Rankine House Rockingham
 Estate Bath Terrace
 Flat 2 Rankine House Rockingham
 Estate Bath Terrace
 Flat 29 Telford House Rockingham
 Estate Tiverton Street
 Flat 16 Telford House Rockingham
 Estate Tiverton Street
 233 Southwark Bridge Road London
 Southwark
 Flat 15 Stephenson House Rockingham
 Estate Bath Terrace
 Flat 7 Rennie House Rockingham Estate
 Bath Terrace
 Apartment 3204 251 Southwark Bridge
 Road London
 Apartment 801 251 Southwark Bridge
 Road London
 Apartment 710 251 Southwark Bridge
 Road London
 Apartment 505 251 Southwark Bridge
 Road London
 Apartment 405 251 Southwark Bridge
 Road London
 Apartment 3009 251 Southwark Bridge
 Road London
 Apartment 2906 251 Southwark Bridge
 Road London
 Apartment 2809 251 Southwark Bridge
 Road London
 Apartment 2703 251 Southwark Bridge
 Road London
 Apartment 2609 251 Southwark Bridge
 Road London
 Apartment 2602 251 Southwark Bridge
 Road London
 Apartment 2507 251 Southwark Bridge
 Road London
 Apartment 2409 251 Southwark Bridge
 Road London
 Apartment 2105 251 Southwark Bridge
 Road London
 Apartment 2004 251 Southwark Bridge
 Road London
 Apartment 2002 251 Southwark Bridge
 Road London
 Apartment 1605 251 Southwark Bridge
 Road London
 Apartment 1601 251 Southwark Bridge
 Road London

Apartment 1206 251 Southwark Bridge
 Road London
 Apartment 1109 251 Southwark Bridge
 Road London
 Apartment 1106 251 Southwark Bridge
 Road London
 Unit 2 Second Floor Lancaster House 70
 Newington Causeway
 Flat 9 Pioneer Building 91 Newington
 Causeway
 Flat 7 Balppa House 57 - 61 Newington
 Causeway
 Flat 4 Stephenson House Rockingham
 Estate Bath Terrace
 Flat 54 Stephenson House Rockingham
 Estate Bath Terrace
 Flat 44 Stephenson House Rockingham
 Estate Bath Terrace
 Flat 39 Stephenson House Rockingham
 Estate Bath Terrace
 Flat 30 Stephenson House Rockingham
 Estate Bath Terrace
 Flat 28 Stephenson House Rockingham
 Estate Bath Terrace
 Flat 14 Fraser Court 1 Brockham Street
 Flat 34 Telford House Rockingham
 Estate Tiverton Street
 Flat 30 Telford House Rockingham
 Estate Tiverton Street
 Flat 21 Stephenson House Rockingham
 Estate Bath Terrace
 Flat 17 Stephenson House Rockingham
 Estate Bath Terrace
 Flat 16 Rennie House Rockingham
 Estate Bath Terrace
 Apartment 3302 251 Southwark Bridge
 Road London
 Apartment 703 251 Southwark Bridge
 Road London
 Apartment 504 251 Southwark Bridge
 Road London
 Apartment 3004 251 Southwark Bridge
 Road London
 Apartment 2907 251 Southwark Bridge
 Road London
 Apartment 2904 251 Southwark Bridge
 Road London
 Apartment 2701 251 Southwark Bridge
 Road London
 Apartment 2305 251 Southwark Bridge
 Road London
 Apartment 2204 251 Southwark Bridge

Road London
 Apartment 2103 251 Southwark Bridge
 Road London
 Apartment 1401 251 Southwark Bridge
 Road London
 Apartment 1012 251 Southwark Bridge
 Road London
 Apartment 3503 251 Southwark Bridge
 Road London
 Apartment 810 251 Southwark Bridge
 Road London
 Advocates Lounge Sessions House
 Newington Causeway
 Flat 35 Pioneer Building 91 Newington
 Causeway
 Flat 31 Pioneer Building 91 Newington
 Causeway
 Flat 28 Pioneer Building 91 Newington
 Causeway
 Flat 14 Pioneer Building 91 Newington
 Causeway
 Flat 13 Pioneer Building 91 Newington
 Causeway
 Fourth Floor Lancaster House 70
 Newington Causeway
 Railway Arch E Newington Causeway
 London
 Unit 10 Newington Court Business
 Centre 64A Newington Causeway
 Unit 8 Newington Court Business Centre
 64A Newington Causeway
 Unit 6 Newington Court Business Centre
 64A Newington Causeway
 Flat A 2 Avonmouth Street London
 4C And 4D Fourth Floor 79 - 81 Borough
 Road London
 4a.p04 Fourth Floor 79 - 81 Borough
 Road London
 4a.p02 Fourth Floor 79 - 81 Borough
 Road London
 First Floor Lancaster House 70
 Newington Causeway
 3a.p01 Third Floor 79 - 81 Borough
 Road London
 2b.p01 Second Floor 79 - 81 Borough
 Road London
 1C Office First Floor 79 - 81 Borough
 Road London
 1b.1.11 First Floor 79 - 81 Borough Road
 London
 Unit 4 Newington Court Business Centre
 64A Newington Causeway

Unit 1 Railway Arch 99 Rockingham
 Street
 Unit 3 Newington Court Business Centre
 64A Newington Causeway
 Unit 7 Newington Court Business Centre
 64A Newington Causeway
 A4.p05 Fourth Floor 79 - 81 Borough
 Road London
 3B Office Third Floor 79 - 81 Borough
 Road London
 3d.p01 Third Floor 79 - 81 Borough
 Road London
 3a.p04 Third Floor 79 - 81 Borough
 Road London
 1b.p03 First Floor 79 - 81 Borough Road
 London
 1a.p03 First Floor 79 - 81 Borough Road
 London
 Suite 102 First Floor 241 Southwark
 Bridge Road London
 Second Floor 241 Southwark Bridge
 Road London
 Old Spike 251 Southwark Bridge Road
 London
 Piccio Mercato Metropolitano 42
 Newington Causeway
 Flat 43 Ceramic Building 87B Newington
 Causeway
 Flat 30 Ceramic Building 87B Newington
 Causeway
 Flat 24 Ceramic Building 87B Newington
 Causeway
 Flat 19 Ceramic Building 87B Newington
 Causeway
 Flat 16 Ceramic Building 87A Newington
 Causeway
 Flat 14 Ceramic Building 87A Newington
 Causeway
 Flat 5 Ceramic Building 87A Newington
 Causeway
 Flat 4 Ceramic Building 87A Newington
 Causeway
 Travel Lodge Hotel Ceramic Building 87
 Newington Causeway London
 Apartment 2509 251 Southwark Bridge
 Road London
 Flat 37 Pioneer Building 91 Newington
 Causeway
 Apartment 1205 251 Southwark Bridge
 Road London
 Apartment 709 251 Southwark Bridge
 Road London

Flat 8 Rennie House Rockingham Estate
 Bath Terrace
 Apartment 2608 251 Southwark Bridge
 Road London
 Apartment 1610 251 Southwark Bridge
 Road London
 Apartment 1412 251 Southwark Bridge
 Road London
 51 Harper Road London Southwark
 Apartment 906 251 Southwark Bridge
 Road London
 Flat 12 Pioneer Building 91 Newington
 Causeway
 Apartment 1306 251 Southwark Bridge
 Road London
 Apartment 3308 251 Southwark Bridge
 Road London
 Flat 3 Newall House Rockingham Estate
 Harper Road
 Flat 31 Telford House Rockingham
 Estate Tiverton Street
 Flat 12 Telford House Rockingham
 Estate Tiverton Street
 Flat 5 Newall House Rockingham Estate
 Harper Road
 Flat 14 Newall House Rockingham
 Estate Harper Road
 Flat 15 Pioneer Building 91 Newington
 Causeway
 Flat 21 Devonshire House Bath Terrace
 Apartment 2208 251 Southwark Bridge
 Road London
 Apartment 2206 251 Southwark Bridge
 Road London
 Apartment 1904 251 Southwark Bridge
 Road London
 64 Newington Causeway London
 Southwark
 1a.1.2 First Floor 79 - 81 Borough Road
 London
 Suite 307 Third Floor 241 Southwark
 Bridge Road London
 Fifth Floor 241 Southwark Bridge Road
 London
 68 Newington Causeway London
 Southwark
 Arch 90 Tiverton Street London
 Flat 45 Ceramic Building 87B Newington
 Causeway
 Flat 41 Ceramic Building 87B Newington
 Causeway
 Flat 40 Ceramic Building 87B Newington

Causeway
 Flat 38 Ceramic Building 87B Newington
 Causeway
 Flat 32 Ceramic Building 87B Newington
 Causeway
 Flat 21 Ceramic Building 87B Newington
 Causeway
 Flat 10 Ceramic Building 87A Newington
 Causeway
 Flat 8 Ceramic Building 87A Newington
 Causeway
 Flat 62 Stephenson House Rockingham
 Estate Bath Terrace
 Flat 16 Rankine House Rockingham
 Estate Bath Terrace
 Unit 1 5 - 9 Rockingham Street London
 Flat 25 Pioneer Building 91 Newington
 Causeway
 Flat 11 Stephenson House Rockingham
 Estate Bath Terrace
 Flat 17 Pioneer Building 91 Newington
 Causeway
 Apartment 1507 251 Southwark Bridge
 Road London
 Apartment 2909 251 Southwark Bridge
 Road London
 Apartment 2303 251 Southwark Bridge
 Road London
 Flat 15 Rumford House Rockingham
 Estate Bath Terrace
 Apartment 1807 251 Southwark Bridge
 Road London
 Flat 6 Telford House Rockingham Estate
 Tiverton Street
 Apartment 807 251 Southwark Bridge
 Road London
 235 Southwark Bridge Road London
 Southwark
 Apartment 503 251 Southwark Bridge
 Road London
 Flat 10 Devonshire House Bath Terrace
 Flat 5 Rumford House Rockingham
 Estate Bath Terrace
 Flat 19 Bath House Bath Terrace
 Flat 24 Devonshire House Bath Terrace
 Flat 14 Devonshire House Bath Terrace
 Flat 73 Stephenson House Rockingham
 Estate Bath Terrace
 Flat 71 Stephenson House Rockingham
 Estate Bath Terrace
 Apartment 1902 251 Southwark Bridge
 Road London

Flat 5 Rankine House Rockingham
 Estate Bath Terrace
 Flat 59 Stephenson House Rockingham
 Estate Bath Terrace
 Flat 43 Stephenson House Rockingham
 Estate Bath Terrace
 Apartment 1809 251 Southwark Bridge
 Road London
 Apartment 1411 251 Southwark Bridge
 Road London
 Apartment 1304 251 Southwark Bridge
 Road London
 Apartment 1301 251 Southwark Bridge
 Road London
 Apartment 704 251 Southwark Bridge
 Road London
 Apartment 509 251 Southwark Bridge
 Road London
 Apartment 3501 251 Southwark Bridge
 Road London
 Flat 25 Rankine House Rockingham
 Estate Bath Terrace
 Flat 10 Telford House Rockingham
 Estate Tiverton Street
 Flat 17 Rankine House Rockingham
 Estate Bath Terrace
 100 Newington Causeway London
 Southwark
 Flat 24 Trinity House Bath Terrace
 Flat 19 Trinity House Bath Terrace
 Flat 17 Trinity House Bath Terrace
 Apartment 3003 251 Southwark Bridge
 Road London
 Apartment 2910 251 Southwark Bridge
 Road London
 Flat 61 Stephenson House Rockingham
 Estate Bath Terrace
 Flat 9 Stephenson House Rockingham
 Estate Bath Terrace
 Flat 33 Stephenson House Rockingham
 Estate Bath Terrace
 Apartment 1509 251 Southwark Bridge
 Road London
 Apartment 1502 251 Southwark Bridge
 Road London
 Apartment 1208 251 Southwark Bridge
 Road London
 Apartment 3504 251 Southwark Bridge
 Road London
 Apartment 2707 251 Southwark Bridge
 Road London
 Apartment 3208 251 Southwark Bridge

Road London
 Apartment 3103 251 Southwark Bridge
 Road London
 Apartment 1203 251 Southwark Bridge
 Road London
 Apartment 1009 251 Southwark Bridge
 Road London
 Flat 19 Rumford House Rockingham
 Estate Bath Terrace
 Flat 8 Bath House Bath Terrace
 Flat 20 Bath House Bath Terrace
 Apartment 2605 251 Southwark Bridge
 Road London
 Apartment 2510 251 Southwark Bridge
 Road London
 Flat 19 Stephenson House Rockingham
 Estate Bath Terrace
 Flat 16 Stephenson House Rockingham
 Estate Bath Terrace
 Flat 5 Fraser Court 1 Brockham Street
 Flat 2 Fraser Court 1 Brockham Street
 Flat 34 Pioneer Building 91 Newington
 Causeway
 Flat 6 Devonshire House Bath Terrace
 Flat 29 Devonshire House Bath Terrace
 Flat 8A Telford House Rockingham
 Estate Tiverton Street
 Flat 17A Telford House Rockingham
 Estate Tiverton Street
 Flat 3 Balppa House 57 - 61 Newington
 Causeway
 Fifth Floor Lancaster House 70
 Newington Causeway
 Railway Arch 72 Borough Road London
 Flat 9 Bath House Bath Terrace
 58 - 62 Newington Causeway London
 Southwark
 24 Newington Causeway London
 Southwark
 69 - 71 Newington Causeway London
 Southwark
 Flat 3 Bath House Bath Terrace
 Flat 5 Devonshire House Bath Terrace
 Flat 27 Devonshire House Bath Terrace
 Flat 2 Newall House Rockingham Estate
 Harper Road
 Flat 1 Devonshire House Bath Terrace
 Flat 69 Stephenson House Rockingham
 Estate Bath Terrace
 Flat 49 Stephenson House Rockingham
 Estate Bath Terrace
 Flat 4 Rankine House Rockingham

Estate Bath Terrace	Road London
Flat 20 Rankine House Rockingham	Apartment 2601 251 Southwark Bridge
Estate Bath Terrace	Road London
Flat 15 Rankine House Rockingham	Apartment 2506 251 Southwark Bridge
Estate Bath Terrace	Road London
Flat 40 Telford House Rockingham	Apartment 2306 251 Southwark Bridge
Estate Tiverton Street	Road London
Flat 37 Telford House Rockingham	Apartment 2209 251 Southwark Bridge
Estate Tiverton Street	Road London
Flat 24 Telford House Rockingham	Apartment 2205 251 Southwark Bridge
Estate Tiverton Street	Road London
Flat 18 Telford House Rockingham	Apartment 1805 251 Southwark Bridge
Estate Tiverton Street	Road London
Flat 13 Telford House Rockingham	Apartment 1707 251 Southwark Bridge
Estate Tiverton Street	Road London
Flat 11 Telford House Rockingham	Apartment 1512 251 Southwark Bridge
Estate Tiverton Street	Road London
Flat 1 Telford House Rockingham Estate	Apartment 1408 251 Southwark Bridge
Tiverton Street	Road London
Flat 23 Stephenson House Rockingham	Apartment 1303 251 Southwark Bridge
Estate Bath Terrace	Road London
Flat 25 Rennie House Rockingham	Apartment 1207 251 Southwark Bridge
Estate Bath Terrace	Road London
Apartment 804 251 Southwark Bridge	Apartment 1002 251 Southwark Bridge
Road London	Road London
Apartment 605 251 Southwark Bridge	Apartment 909 251 Southwark Bridge
Road London	Road London
Apartment 510 251 Southwark Bridge	Apartment 3702 251 Southwark Bridge
Road London	Road London
Apartment 3107 251 Southwark Bridge	Unit 6 Second Floor Lancaster House 70
Road London	Newington Causeway
Apartment 3001 251 Southwark Bridge	Flat 6 29A Bath Terrace London
Road London	Flat 33 Pioneer Building 91 Newington
Apartment 2110 251 Southwark Bridge	Causeway
Road London	
Apartment 2607 251 Southwark Bridge	

Appendix 5: Consultation responses received

Internal services

LBS Community Infrastructure Levy Team
 LBS Ecology
 LBS Urban Forester
 LBS Transport Policy
 LBS Archaeology
 LBS Design & Conservation Team [Surgery]
 LBS Transport Policy
 LBS Archaeology
 LBS Design & Conservation Team [Formal]
 LBS Ecology
 LBS Highways Development & Management
 LBS Urban Forester
 LBS Planning Policy
 LBS Archaeology
 LBS Planning Policy
 LBS Environmental Protection
 LBS Urban Forester

Statutory and non-statutory organisations

London Fire & Emergency Planning Authori
 Network Rail
 Metropolitan Police Service
 Thames Water

Neighbour and local groups consulted:

23 Wesley Close London Southwark
 6 Brockham Street London SE1 4HX

20 New End Square London NW3 1LN
 59 Stephenson House Bath Terrace LONDON
 Flat 8 Fraser Court 1 Brockham Street London
 Local Resident London SE1
 Apartment 2702 TWO FIFTY ONE Southwark Bridge Road London
 Flat 20 Dawkins Court 2 Garland Close London
 2 Avonmouth Street London SE1 6NX
 Flat 607 9 Steedman Street London
 69 - 71 Newington Causeway London Southwark
 Flat 17 Stephenson House Rockingham Estate London

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)			
MEMBER OF PARLIAMENT (Electronic)		LEGAL TEAM	
Neil Coyle MP, House of Commons, London, SW1A 0AA		Kamil Dolebski	1
Miatta Fahnbulleh MP, House of Commons, London SW1A 0AA			
Helen Hayes MP, House of Commons, London, SW1A 0AA			
		CONSTITUTIONAL TEAM	
		Gregory Weaver (incl. chair's copy)	2
		TOTAL PRINT RUN	
			9
List Updated: 28 October 2025			