

## Planning Committee (Smaller Applications)

Wednesday 15 October 2025

7.00 pm

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

### Membership

Councillor Cleo Soanes (Chair)  
Councillor Jane Salmon (Vice-Chair)  
Councillor Sabina Emmanuel  
Councillor Sam Foster  
Councillor Nick Johnson  
Councillor Richard Livingstone  
Councillor David Parton

### Reserves

Councillor Ketzia Harper  
Councillor Darren Merrill  
Councillor Victoria Mills  
Councillor Emily Tester  
Councillor Joseph Vambe

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### INFORMATION FOR MEMBERS OF THE PUBLIC

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#### Access to information

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

#### Babysitting/Carers allowances

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** Beverley Olamijulo on 020 7525 7234 or email: [Beverley.olamijulo@southwark.gov.uk](mailto:Beverley.olamijulo@southwark.gov.uk)

Members of the committee are summoned to attend this meeting

**Althea Loderick**

Chief Executive

Date: 7 October 2025



## Planning Committee (Smaller Applications)

Wednesday 15 October 2025

7.00 pm

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

### Order of Business

Item No.	Title	Page No.
1. APOLOGIES	To receive any apologies for absence.	
2. CONFIRMATION OF VOTING MEMBERS	A representative of each political group will confirm the voting members of the committee.	
3. NOTIFICATION OF ANY ITEMS OF BUSINESS WHICH THE CHAIR DEEMS URGENT	In special circumstances, an item of business may be added to an agenda within five clear days of the meeting.	
4. DISCLOSURE OF INTERESTS AND DISPENSATIONS	Members to declare any personal interests and dispensation in respect of any item of business to be considered at this meeting.	
5. MINUTES	To approve as a correct record the minutes of the meeting held on 8 September 2025.	1 - 5
6. TREE PRESERVATION ORDER (TPO): 79 AND 83 MINA ROAD AND LAND REAR - 83 MINA ROAD LONDON SE17 2QS		6 - 30
7. TREE PRESERVATION ORDER (TPO): 153 TURNEY ROAD, LONDON SOUTHWARK SE21 7JU		31 - 51

Item No.	Title	Page No.
8.	<b>TREE PRESERVATION ORDER (TPO): OLD SALT QUAY 163 ROTHERHITHE STREET LONDON SE16 5QU</b>	52 - 72
9.	<b>DEVELOPMENT MANAGEMENT</b>	73 - 77
	<b>9.1. ELIM ESTATE WESTERN STREET, LONDON SE1 4DA</b>	78 - 241

**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.”

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

Date: 7 October 2025

## Planning Committee (Smaller 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 (smaller 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](mailto:ConsTeam@southwark.gov.uk) in advance of the meeting by **5pm** on the working day preceding the meeting.

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

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

Planning Committee Clerk, Constitutional Team  
Governance and Assurance  
Tel: 020 7525 7234



## Planning Committee (Smaller Applications)

MINUTES of the Planning Committee (Smaller Applications) held on Monday 8 September 2025 at 7.00 pm at Ground Floor Meeting Rooms - 160 Tooley Street, London SE1 2QH

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<b>PRESENT:</b>	Councillor Cleo Soanes (Chair) Councillor Jane Salmon (Vice-chair) Councillor Sabina Emmanuel Councillor Sam Foster Councillor Nick Johnson Councillor Richard Livingstone Councillor David Parton
<b>OTHER MEMBERS PRESENT:</b>	Councillor Ellie Cumbo (ward member) Councillor Jason Ochere (ward member) Councillor Ian Wingfield (ward member)
<b>OFFICER SUPPORT:</b>	Dennis Sangweme (Assistant Director, Development Management) Kathryn Simpson (Assistant Director, Children and Adult Services) Kamil Dolebski (Specialist Planning Lawyer) Michael Tsoukaris, (Group Manager Design & Conservation) Zaib Khan (Team Leader, Development Management) Sonia Watson (Head of Major Applications and New Homes) Andre Verster (Team Leader, Major and New Homes) Beverley Olamijulo (Constitutional Officer)

### 1. APOLOGIES

None were received.

### 2. CONFIRMATION OF VOTING MEMBERS

Those members listed above were confirmed as voting members of the committee.

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

The chair gave notice of the following additional papers circulated prior to the meeting:

- Addendum report relating to item 6.2 – development management item, and
- Members pack.

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

The following member made a declaration regarding the agenda item below:

#### **Agenda item 6.2 – 10 Love Walk, London SE6 8AE**

Councillor Cleo Soanes, non-pecuniary, because she lives in St Giles ward. As a voting member of the committee, she agreed to consider the application with an open mind.

### **5. MINUTES**

#### **RESOLVED:**

That the minutes for the planning Committee (Smaller Applications) meeting held on 1 July 2025 be approved as a correct record and signed by the chair.

### **6. DEVELOPMENT MANAGEMENT**

Members noted the development management report.

#### **RESOLVED:**

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

## 6.1 DULWICH SPORTS CLUB, GIANT ARCHES ROAD, LONDON SE24 9HP

### Planning application reference 25/AP/1838

Report: See pages 11 to 43 of the agenda pack.

### PROPOSAL

*Retention of flood lighting / lamps on tennis court 1 and replacement of existing flood light poles and flood lighting / lamps, on tennis courts 2 and 3.*

The committee heard the officer's introduction to the report. Members of the committee asked questions of the officers.

An objector was present to address the committee and responded to questions from members.

The applicant and applicant's agent addressed the committee and responded to questions from members.

A representative from Dulwich Sports Club read out a statement on behalf of a supporter who was unable to attend the committee meeting.

There were no ward councillors present at the meeting.

A motion to grant the application subject to conditions set out in the officer's report, that were presented during the hearing, was moved, seconded, put to the vote and declared carried.

### RESOLVED:

That planning permission be granted subject to conditions.

At this juncture, the committee adjourned for a fifteen-minute comfort break.

The meeting resumed at 8.00pm.

## 6.2 10 LOVE WALK, LONDON SE5 8AE

### Planning application reference 24/AP/0303

Report: See pages 44 to 156 of the agenda pack and addendum pages 1 to 20.

### PROPOSAL

*Demolition of all buildings on site and comprehensive redevelopment to provide a part three and part-four storey (including ground) plus basement new care home*

*(Class C2 - Residential Institutions), including cycle parking, refuse/recycling storage, mechanical and electrical plant, new sub-station, landscaping and green/living walls, amenity areas, perimeter treatment and associated ancillary works.*

The committee heard the officer's introduction to the report. Members of the committee asked questions of the officers.

There were objectors present who addressed the committee and responded to questions from members.

At this juncture, the committee adjourned for a five-minute comfort break. The meeting resumed at 9.30pm.

The applicant addressed the committee and responded to questions from members.

There were no supporters present, who lived within 100 metres of the development site and wished to speak.

Councillors, Ian Wingfield, Jason Ochere and Ellie Cumbo addressed the committee in their capacity as ward members. They responded to questions from members of the committee.

The applicant responded to further questions from members of the committee.

Members further debated on the application.

### **Motion to exclude the press and public**

At 11.40pm, a motion to exclude the press and public was moved, seconded and resolved:

That the committee discuss further aspects of the scheme with officers.

The meeting reconvened at 12.25am.

A motion to grant the application subject to conditions and amended conditions set out in the officer's report, and addendum report, that were presented during the hearing, was moved, seconded, put to the vote and declared carried.

### **RESOLVED:**

1. That planning permission be granted subject to amended conditions, additional condition as set out below and, in the report, and addendum report and for the applicant to enter into an appropriate S106 legal agreement.

2. That in the event that the requirements of paragraph 1 above are not met by 31 March 2026, the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 291.

**Note:**

Additional condition

Notwithstanding the plans hereby approved, prior to the commencement of the development (and in consultation with Southwark ASC), 1:10/1:20 scaled layouts of the rooms including the wet rooms; common areas; and equipment store rooms to be submitted and approved in writing by the LPA.

The development shall be constructed in accordance with the agreed details.

Reason: in order to ensure that the development provides excellent accessibility, accommodation, and access to communal spaces in accordance with policy P7 of the Southwark Plan (2022).

The meeting ended at 12:35 am.

**CHAIR:**

**DATED:**

# Agenda Item 6.

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<b>Meeting Name:</b>	Planning Committee (Smaller Applications)
<b>Date:</b>	15 October 2025
<b>Report title:</b>	Confirmation of TPO 747 79 and 83 Mina Road and Land Rear 83 Mina Road London, SE17 2QS
<b>Ward(s) or groups affected:</b>	Faraday
<b>Classification:</b>	Open
<b>Reason for lateness (if applicable):</b>	Not Applicable
<b>From:</b>	Director of Planning and Growth

## RECOMMENDATION

1. That the provisional TPO reference 747 be confirmed, unamended

## BACKGROUND INFORMATION

2. A Tree Preservation Order ('TPO') was served, by hand, on a provisional basis, by the Urban Forester upon report of works to a cherry tree located on unadopted land which were halted by a neighbour. Following a site visit and, in accordance with the Council's statutory duty to preserve amenity under s.198 of the Town and Country Planning Act 1990 ('The Act'), two trees within the locality were considered worthy of protection. 1 Ailanthus altissima (Tree of Heaven) and 1 Prunus avium (Wild Cherry).
3. The order was issued to all affected parties at the addresses noted above in the report title along with neighbouring properties with land boundaries within the canopies of the trees and served by hand on 12 May 2025.
4. Four objections and three letters in support of the TPO have subsequently been received, which according to the Council's standing orders must be considered at planning committee before the order can be confirmed.
5. Representations received during the consultation period are outlined within the report at paragraphs [19-32] and at [APPENDIX E]
6. The TPO must be confirmed within six months of the date in which the Order came into force (12 November 2025) to prevent expiration of the provisions in accordance with the regulations (Town and Country (Tree Preservation) (England) Regulations 2012).

## KEY ISSUES FOR CONSIDERATION

7. To continue to have effect the TPO attached must be confirmed within 6 months from the date of being served.
8. The trees were assessed as attaining a score of 12 for the Ailanthus and 16 for the Wild Cherry (out of a potential total 25) under the Tree Evaluation Method for Tree Preservation Orders (TEMPO), with officers paying due regard to the condition and life expectancy of the trees, together with their comparative visibility and resulting in a decision guide indicating that the making of a TPO is defensible in respect of both trees, and in the case of the Cherry, definitely merited.
9. The confirmation of a TPO cannot be appealed. However, any subsequent refusal of an application for works to a TPO or imposition of conditions upon consent can be appealed to the Secretary of State via the Planning Inspectorate.
10. Anyone proposing to carry out works to a tree or trees subject to a TPO must seek permission from the local planning authority. This involves completing an application form identifying the trees, detailing the works proposed and explaining the reasons for the works. The council's Planning Officer will usually inspect the trees prior to making a decision and may recommend alternative works or refuse consent. If authorisation is given to fell a protected tree, a new tree will usually be required to be planted as a replacement. However, this will in turn require a new TPO to be served.
11. If a tree protected by a TPO is felled, pruned or wilfully damaged without consent, both the person who carried out the works and the tree owner are liable to be fined up to £20,000 through the Magistrates Court or, if taken to the Crown Court, an unlimited fine. There are exceptional circumstances, such as when a tree is dead, dying or dangerous, when permission is not required. However, in order to avoid the risk of prosecution advice must be sought from the council and five days notice given before carrying out any works (except in an emergency).
12. Where the council is notified that an exception applies, this is duly verified by the council's planning officer upon receipt. Where the exception does not apply, the council may request that the works follow the standard TPO procedure or, if necessary, seek injunctive relief in the crown courts.

## POLICY CONTEXT

13. The law on Tree Preservation Orders is in Part VIII of the Town and Country Planning Act 1990 as amended and in the Town and Country Planning (Tree Preservation) (England) Regulations 2012.
14. Section 198 of the Act imposes a duty on the local planning authority to ensure the preservation and protection of trees whenever appropriate.

15. Priority 3 of the Council's Climate Change Strategy, with particular reference to the Southwark Nature Action Plan (SNAP) (2020); sets out the vision and strategy for the continued protection, conservation and enhancement of nature in the borough. "Southwark will continue to ensure protection of trees and woodlands subject to Tree Preservation Orders, in Conservation Areas and Sites of Importance for Nature Conservation, with trees to be retained on development sites and to require high standards of replacement tree planting. (1.18 Biodiversity and Trees (SNAP) (2020))"
16. London Plan Policy G7 Trees and woodlands states that trees and woodlands should be protected, maintained, and enhanced, following the guidance of the London Tree and Woodland Framework.
17. Policy P61 of the Southwark Plan (7) states:  
In exceptional circumstances removal of trees protected by TPO or conservation area status will be permitted where sufficient evidence has been provided to justify their loss. Replacement planting will be expected where removal is agreed. The replacement of TPO trees must take into account the loss of canopy cover as measured by stem girth and biodiversity value.
18. The current recommendation supports the relevant national legislation, London and Southwark policies to retain trees with proven amenity value.

### **Objection to the order**

19. Representations in objection to the Order have been received from the property owners at Numbers 77, 81, 83 and 85 Mina Road. Three letters in support have also been received by the Council from neighbours at Albany Road. Both the objectors and the supporters have submitted arboricultural reports undertaken by consultants with differing appraisals of the Cherry tree and its contribution. **[APPENDIX E]** The Council's Urban Forester has visited site and undertaken an appraisal in accordance with the regulations.
20. The basis of the objections are that the Ailanthus tree is a non-native invasive species listed under Schedule 9 of the Wildlife and Countryside Act, 1981 which spreads rapidly. Whereas it is claimed that the Cherry is located on unstable ground, is in poor condition and has caused a retaining wall to fail. Further claims of damage to neighbouring built structure are alluded to but have not been evidenced. Both trees have been questioned on their inclusion regarding a lack of public visibility.
21. In response to the inclusion of Ailanthus within the public register of trees subject to a TPO. Ailanthus (Tree of Heaven) was added to Schedule 9 of the Wildlife and Countryside Act 1981 as a non-native invasive species in 2019.
22. The Schedule intends to protect Britain's rural landscape and whilst it is important to control the spread in urban areas, Section 14 of that Act (to which the Schedule applies) specifies that it is an offence to release non-native animals or introduce invasive plants into the wild in Great Britain and so has very little application within Inner London, save for in proximity to the Borough's ancient woodland.

23. Ailanthus was widely planted by Dr Salter and the Bermondsey Beautification Committee of 1926, of which many specimens still remain.
24. If a listed plant is already growing on the land, Defra does not consider it to be intentionally kept or cultivated and the tree owner is not committing an offence. This includes plants in private gardens, parks and estates open to the public. However, you cannot intentionally plant listed species on the land, or intentionally cause existing listed plants to spread.
25. Indeed, the benefit of a TPO would allow for the council to condition works in a certain way so as to inhibit the potential for the tree to spread.
26. The tree is visible from public realm at both Mina and Albany roads. As such, there is no impediment to inclusion as a protected tree. If anything, the removal of this tree without consent would provide the Wild Cherry with even greater visibility.
27. Regarding the Wild Cherry, the tree was inspected by Officers prior to issuing the Order, despite recent asymmetrical pruning which had been undertaken the tree was of relatively good form and structure, showing good physiology and no concerns of imminent structural failure.
28. The Tree is clearly visible from Mina Road, Albany Road, and the nearby school grounds and playground of Ark Walworth Academy.
29. One objector has provided photographs showing a small retaining wall with associated cracks and a slight lean. There appears no deviation in tree stem and so the associated movement to the retaining wall would appear to be in relation to a lack of lateral restraint which could be addressed via the installation of pillars or helical bars within the brickwork. Alternatively, the land owner could construct a suitable fence within their property. The photo would appear to show that the neighbouring land owner does not have a fence boundary to the tree. Soil is comprised of made ground but there is no indication that this will lead to tree instability.
30. No further evidence relating to reports of damage to built structure or identifying the tree as an actionable nuisance have been presented to the Council. In general, these are provided by a suitably qualified Loss Adjuster or Structural Engineer.
31. Tree ownership due to vagaries in the land titles has not been substantiated and appears to occupy a strip of unregistered land.
32. Should the recommendation be accepted and the order confirmed then an application to carry out works can be submitted in the usual way with consent or refusal considered on the basis of any further evidence provided. Further, if a scheme is deemed acceptable at full planning, then on the granting of a planning permission, a TPO could be annulled if it is required to facilitate development.

## Financial implications

- 33. Should the local authority refuse consent for works to trees protected by an Order or grant consent subject to conditions, the council has a potential liability for compensation. Any compensation may relate either to loss or damage which results from the decision of the council. Therefore, there is a risk that the proposed Order will make the council liable to compensation claims. Because circumstances vary widely, it is not possible to gauge the magnitude of such claims. In any event, no claim can be made for loss or damage incurred before an application for consent to undertake work on a protected tree was made, nor is any compensation payable for loss of development value or other diminution in the value of land.
- 34. Any claim for compensation will be dealt with through the council's official complaints procedure and it is anticipated that any award would be contained within the planning division's budget. This position will be monitored and if the award cannot be contained within existing departmental revenue budgets will be reflected in the council's revenue budget monitoring arrangements for funding from council reserves.
- 35. Any potential drawdown from council reserves for the payment of compensation claims will be subject to agreement by the relevant cabinet member, or full cabinet in the case of claims over £50,000.
- 36. Staffing and any other costs connected with this recommendation will be contained within existing departmental revenue budgets.

## Conclusion

- 37. For the reasons set out within the body of this report, it is hereby recommended that TPO 747; be confirmed, unamended.

## Reasons for urgency

### Legislative requirement

- 38. The TPO lapses on 12 November if not confirmed.

## BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Local Development Framework and Development Plan Documents	Planning and Growth Directorate 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 0207 525 0254 Council website: <a href="http://www.southwark.gov.uk">www.southwark.gov.uk</a>
TPO guidance <a href="https://www.gov.uk/guidance/tree-preservation-orders-and-trees-in-conservation-areas#confirming-tree-preservation-orders">https://www.gov.uk/guidance/tree-preservation-orders-and-trees-in-conservation-areas#confirming-tree-preservation-orders</a>	Online	NA
Southwark Council TPO information <a href="http://www.southwark.gov.uk/environment/trees/tree-preservation-orders-and-conservation-areas">http://www.southwark.gov.uk/environment/trees/tree-preservation-orders-and-conservation-areas</a>	Online	NA
Southwark TPO register <a href="https://geo.southwark.gov.uk/connect/analyst/mobile/#/main?mapcfg=Southwark%20Design%20and%20Conservation&amp;overlays=TPO%20zones">https://geo.southwark.gov.uk/connect/analyst/mobile/#/main?mapcfg=Southwark%20Design%20and%20Conservation&amp;overlays=TPO%20zones</a>	Online	NA

## APPENDICES

No.	Title
Appendix A	Provisional TPO 747
Appendix B	Map
Appendix C	TEMPO
Appendix D	Photos and Photomontages
Appendix E	Arboricultural Reports

## AUDIT TRAIL

<b>Lead Officer</b>	Stephen Platts, Director of Planning and Growth	
<b>Report Author</b>	Liam Bullen, Senior Planner – Urban Forester	
<b>Version</b>	Final	
<b>Dated</b>	25 September 2025	
<b>Key Decision</b>	No	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>		
Officer Title	Comments Sought	Comments included
Assistant Chief Executive - Governance and Assurance	No	No
Strategic Director, Resources	No	No
Strategic Director, Environment, Sustainability and Growth	No	No
<b>Date final report sent to Constitutional Team</b>	29 September 2025	

**IMPORTANT - THIS COMMUNICATION MAY AFFECT YOUR PROPERTY**

**TOWN AND COUNTRY PLANNING ACT 1990  
TOWN AND COUNTRY PLANNING (TREE PRESERVATION) (ENGLAND)  
REGULATIONS 2012**

**London Borough of Southwark  
Tree Preservation Order (No. 747) 2025**

79 and 83 MINA ROAD and Land Rear 83 MINA ROAD LONDON SE17 2QS

THIS IS A FORMAL NOTICE to let you know that on the 12<sup>th</sup> May 2025 the Council made the above tree preservation order.

A copy of the order is enclosed. In simple terms, it prohibits anyone from cutting down, topping or lopping any of the trees described in the Schedule and shown on the plan, without the local planning authority's consent.

Some explanatory guidance on tree preservation orders is available via <https://www.gov.uk/guidance/tree-preservation-orders-and-trees-in-conservation-areas#tree-preservation-orders--general>.

The Council has made the order under the provisions laid out in s.198 of the Town and Country Planning Act 1990 (as amended).

The order took effect on a provisional basis on 12<sup>th</sup> May 2025. It will continue in force on this basis for a further 6 months or until the order is confirmed by the Council, whichever first occurs.

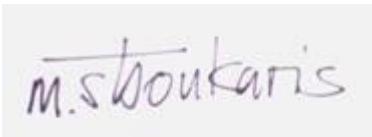
The Council will consider whether the order should be confirmed, that is to say, whether it should take effect permanently. Before this decision is made, the people affected by the order have a right to make objections or other representations about any of the trees, groups of trees or woodlands covered by the order.

If you would like to make any representations, please make sure we receive them in writing within 28 days of this date of this notice (17:00 12/06/2025). Your comments must comply with regulation 6 of the Town and Country Planning (Tree Preservation) (England) Regulations 2012, a copy of which is provided. Send your comments to London Borough of Southwark, (Ref TPO/747), 160 Tooley Street, PO Box 64529, London SE1P 5LX. All valid objections or representations are carefully considered before a decision on whether to confirm the order is made. Additional information regarding tree preservation orders can be found at <https://www.southwark.gov.uk/environment/trees/tree-preservation-orders-and-conservation-areas>

The Council will write to you again when that decision has been made. In the meantime, if you would like any further information or have any questions about this notification, please contact the Urban Forestry team on 0207 525 5338.

Dated 12<sup>th</sup> May 2025

Signed on behalf of the London Borough of Southwark



Michael Tsoukaris MSc(Arch) MSc(CVS) RIBA  
Group Manager, Design, Conservation and Transport Policy  
Authorised by the Council to sign in that behalf

London Borough of Southwark  
160 Tooley Street  
PO Box 64529  
London SE1P 5LX

**Regulation 6 of the Town and Country Planning (Tree Preservation) (England) Regulations 2012**

*Objections and representations*

*6(1) Subject to paragraph (2), objections and representations—*

*(a) shall be made in writing and—*

- (i) delivered to the authority not later than the date specified by them under regulation 5(2)(c); or*
- (ii) sent to the authority in a properly addressed and pre-paid letter posted at such time that, in the ordinary course of post, it would be delivered to them not later than that date;*

*(b) shall specify the particular trees, groups of trees or woodlands (as the case may be) in respect of which such objections and representations are made; and*

*(c) in the case of an objection, shall state the reasons for the objection.*

*6(2) The authority may treat as duly made objections and representations which do not comply with the requirements of paragraph (1) if, in the particular case, they are satisfied that compliance with those requirements could not reasonably have been expected.*

## Tree Preservation Order

Town and Country Planning Act 1990

The Tree Preservation Order (TPO Number 747) 2025

The London Borough of Southwark in exercise of the powers conferred on them by section 198 of the Town and Country Planning Act 1990 make the following Order—

**Citation**

1. This Order may be cited as Tree Preservation Order (TPO Number 747) 2025.

**Interpretation**

2.— (1) In this Order “the authority” means the London Borough of Southwark  
 (2) In this Order any reference to a numbered section is a reference to the section so numbered in the Town and Country Planning Act 1990 and any reference to a numbered regulation is a reference to the regulation so numbered in the Town and Country Planning (Tree Preservation)(England) Regulations 2012.

**Effect**

3.— (1) Subject to article 4, this Order takes effect provisionally on the date on which it is made.  
 (2) Without prejudice to subsection (7) of section 198 (power to make tree preservation orders) or subsection (1) of section 200 (tree preservation orders: Forestry Commissioners) and, subject to the exceptions in regulation 14, no person shall—  
 (a) cut down, top, lop, uproot, wilfully damage, or wilfully destroy; or  
 (b) cause or permit the cutting down, topping, lopping, uprooting, wilful damage or wilful destruction of,

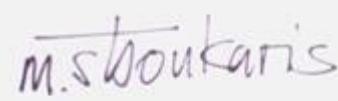
any tree specified in the Schedule to this Order except with the written consent of the authority in accordance with regulations 16 and 17, or of the Secretary of State in accordance with regulation 23, and, where such consent is given subject to conditions, in accordance with those conditions.

**Application to trees to be planted pursuant to a condition**

4. In relation to any tree identified in the first column of the Schedule by the letter “C”, being a tree to be planted pursuant to a condition imposed under paragraph (a) of section 197 (planning permission to include appropriate provision for preservation and planting of trees), this Order takes effect as from the time when the tree is planted.

Dated 12<sup>th</sup> May 2025

Signed on behalf of the London Borough of Southwark



Michael Tsoukaris MSc(Arch) MSc(CVS) RIBA  
 Group Manager, Design, Conservation and Transport Policy  
 Authorised by the Council to sign in that behalf

## CONFIRMATION OF ORDER

This Order was confirmed by London Borough of Southwark without modification on the \_\_\_\_\_ day of

*OR*

This Order was confirmed by the London Borough of Southwark, subject to the modifications indicated by \_\_\_\_\_, on the \_\_\_\_\_ day of

Signed on behalf of the London Borough of Southwark

.....

Authorised by the Council to sign in that behalf]

## DECISION NOT TO CONFIRM ORDER

A decision not to confirm this Order was taken by London Borough of Southwark on the \_\_\_\_\_ day of

Signed on behalf of the London Borough of Southwark

.....

Authorised by the Council to sign in that behalf

## VARIATION OF ORDER

This Order was varied by the London Borough of Southwark on the \_\_\_\_\_ day of  
by a variation order under reference number \_\_\_\_\_ a copy of which is attached

Signed on behalf of the London Borough of Southwark

.....

Authorised by the Council to sign in that behalf

## REVOCATION OF ORDER

This Order was revoked by the London Borough of Southwark on the \_\_\_\_\_ day of

Signed on behalf of the London Borough of Southwark

.....

Authorised by the Council to sign in that behalf

**SCHEDULE**  
**Specification of trees**

**Tree specified as an Individual**  
**(within a black circle on the map)**

<i>Reference on map</i>	<i>Description</i>	<i>Situation</i>
T1	Ailanthus	Rear Garden 79 Mina Road
T2	Wild Cherry	Land Rear 83 Mina Road

**Trees specified as a Group**  
**(within a broken black line on the map)**

<i>Reference on map</i>	<i>Description</i>	<i>Situation</i>
		None

**Trees specified as an Area**  
**(within a dotted black line on the map)**

<i>Reference on map</i>	<i>Description</i>	<i>Situation</i>
None		

**Tree specified as a Woodland**  
**(within a continuous black line on the map)**

<i>Reference on map</i>	<i>Description</i>	<i>Situation</i>
None		

## PLAN



T1 with T2 in Background



T2



TREE EVALUATION METHOD FOR PRESERVATION ORDERS (TEMPO)					
Survey Data Sheet & Decision Guide					
Date:	09.05.2025	Surveyor:	LB		
<b>Tree details</b>					
	747	Tree/Group No:	T1	Species:	Ailanthus
TPO Ref (if applicable):					
Location:	REAR GARDEN 79				
REFER TO GUIDANCE NOTE FOR ALL DEFINITIONS					
<b>Part 1: Amenity London</b>			Score: Highlight as Applicable		
<b>a) Condition &amp; : Southwark</b>			<b>b) Retention span (in years) &amp; suitability for TPO</b>		
Good Highly suitable	5		100+ Highly suitable	5	
Fair Suitable	3		40-100 Very suitable	4	
Poor Unlikely to be suitable	1		20-40 Suitable	2	
Dead Unsuitable	0		10-20 Just suitable	1	
Dying/dangerous* Unsuitable	0		<10* Unsuitable	0	
* Relates to existing context and is intended to apply to severe irremediable defects only		*Includes trees which are an existing or near future nuisance			
<b>c) Relative public visibility &amp; suitability for TPO</b>					
Very large trees with some visibility / prominent large trees		5	Highly suitable		
Large trees, or medium trees clearly visible to the public		4	Suitable		
Medium trees, or large trees with limited view only		3	Suitable	Prominent tree visible from Mina Road	
Young, small, or medium/large trees visible only with difficulty		2	Barely Suitable		
Trees not visible to the public, regardless of size		1	Probably Unsuitable		
<b>d) Other factors ( Trees must have accrued 7 or more points (with no zero score) to qualify)</b>					
Principal components of arboricultural features, or veteran trees		5			
Tree groups, or members of groups important for their cohesion		4			
Trees with identifiable historic, commemorative or habitat importance		3			
Trees of particularly good form, especially if rare or unusual		2			
Trees with none of the above additional redeeming features		1			
<b>Part 2: Expediency assessment (Trees must have accrued 9 or more points to qualify)</b>					
5) Immediate threat to tree	5	Notes:			
3) Foreseeable threat to tree	3	Consented Development for an outbuilding within RPA of the tree			
2) Perceived threat to tree	2				
1) Precautionary only	1				
<b>Part 3: Decision guide</b>					
Any 0 Do not apply TPO	Overall Score:	12		Date:	
1-6 TPO indefensible			TPO Served:		
7-11 Does not merit TPO	Recommend:	TPO			
12-15 TPO defensible		Do Not TPO	Confirmed:		
16+ Definitely merits TPO	Date:				

TREE EVALUATION METHOD FOR PRESERVATION ORDERS (TEMPO)					
Survey Data Sheet & Decision Guide					
Date:	09.05.2025	Surveyor:	LB		
<b>Tree details</b>					
	747	Tree/Group No:	T2	Species:	Wild Cherry
TPO Ref (if applicable):					
Location:	LAND AT 78B PARK HALL ROAD LONDON SE21 8BW				
REFER TO GUIDANCE NOTE FOR ALL DEFINITIONS					
<b>Part 1: Amenity London</b>			Score: Highlight as Applicable		
<b>a) Condition &amp; : Southwark</b>			<b>b) Retention span (in years) &amp; suitability for TPO</b>		
Good Highly suitable	5		100+ Highly suitable	5	
Fair Suitable	3		40-100 Very suitable	4	
Poor Unlikely to be suitable	1		20-40 Suitable	2	Changes in levels close to tree
Dead Unsuitable	0		10-20 Just suitable	1	
Dying/dangerous* Unsuitable	0		<10* Unsuitable	0	
* Relates to existing context and is intended to apply to severe irremediable defects only		*Includes trees which are an existing or near future nuisance			
<b>c) Relative public visibility &amp; suitability for TPO</b>					
Very large trees with some visibility / prominent large trees		5	Highly suitable		
Large trees, or medium trees clearly visible to the public		4	Suitable		
Medium trees, or large trees with limited view only		3	Suitable	Crown visible from Mina road	
Young, small, or medium/large trees visible only with difficulty		2	Barely Suitable		
Trees not visible to the public, regardless of size		1	Probably Unsuitable		
<b>d) Other factors ( Trees must have accrued 7 or more points (with no zero score) to qualify)</b>					
Principal components of arboricultural features, or veteran trees		5			
Tree groups, or members of groups important for their cohesion		4			
Trees with identifiable historic, commemorative or habitat importance		3	Native Wild Cherry with nesting birds present. Significant screening amenity		
Trees of particularly good form, especially if rare or unusual		2			
Trees with none of the above additional redeeming features		1			
<b>Part 2: Expediency assessment (Trees must have accrued 9 or more points to qualify)</b>					
5) Immediate threat to tree	5	Notes: Adjacent land owner has employed a tree surgeon to remove the tree. Local opposition to removal.			
3) Foreseeable threat to tree	3				
2) Perceived threat to tree	2				
1) Precautionary only	1				
<b>Part 3: Decision guide</b>					
Any 0 Do not apply TPO	Overall Score:	16		Date:	
1-6 TPO indefensible	Recommend:	TPO	TPO Served:		
7-11 Does not merit TPO		Do Not TPO	Confirmed:		
12-15 TPO defensible	Date:				
16+ Definitely merits TPO					

## APPENDIX B



## APPENDIX C

TREE EVALUATION METHOD FOR PRESERVATION ORDERS (TEMPO)					
Survey Data Sheet & Decision Guide					
Date:	09.05.2025	Surveyor:	LB		
<b>Tree details</b>					
TPO Ref (if applicable):	747	Tree/Group No:	T1	Species:	Ailanthus
Location:	REAR GARDEN 79				
REFER TO GUIDANCE NOTE FOR ALL DEFINITIONS					
Part 1: Amenity London			Score: Highlight as Applicable		
a) Condition & : Southwark			b) Retention span (in years) & suitability for TPO		
Good Highly suitable	5		100+ Highly suitable	5	
Fair Suitable	3		40-100 Very suitable	4	
Poor Unlikely to be suitable	1		20-40 Suitable	2	
Dead Unsuitable	0		10-20 Just suitable	1	
Dying/dangerous* Unsuitable	0		<10* Unsuitable	0	
* Relates to existing context and is intended to apply to severe irremediable defects only			*Includes trees which are an existing or near future nuisance		
c) Relative public visibility & suitability for TPO					
Very large trees with some visibility / prominent large trees			5	Highly suitable	
Large trees, or medium trees clearly visible to the public			4	Suitable	
Medium trees, or large trees with limited view only			3	Suitable	
Young, small, or medium/large trees visible only with difficulty			2	Barely Suitable	
Trees not visible to the public, regardless of size			1	Probably Unsuitable	
d) Other factors (Trees must have accrued 7 or more points (with no zero score) to qualify)					
Principal components of arboricultural features, or veteran trees			5		
Tree groups, or members of groups important for their cohesion			4		
Trees with identifiable historic, commemorative or habitat importance			3		
Trees of particularly good form, especially if rare or unusual			2		
Trees with none of the above additional redeeming features			1		
Part 2: Expediency assessment (Trees must have accrued 9 or more points to qualify)					
5) Immediate threat to tree		5	Notes:		
3) Foreseeable threat to tree		3	Consented Development for an outbuilding within RPA of the tree		
2) Perceived threat to tree		2			
1) Precautionary only		1			
Part 3: Decision guide					
Any 0 Do not apply TPO		Overall Score:	12	Date:	
1-6 TPO indefensible				TPO Served:	
7-11 Does not merit TPO		Recommend:	TPO		
12-15 TPO defensible			Do Not TPO	Confirmed:	
16+ Definitely merits TPO		Date:			

TREE EVALUATION METHOD FOR PRESERVATION ORDERS (TEMPO)					
Survey Data Sheet & Decision Guide					
Date:	09.05.2025	Surveyor:	LB		
<b>Tree details</b>					
	747	Tree/Group No:	T2	Species:	Wild Cherry
TPO Ref (if applicable):					
Location:	LAND AT 78B PARK HALL ROAD LONDON SE21 8BW				
REFER TO GUIDANCE NOTE FOR ALL DEFINITIONS					
<b>Part 1: Amenity London</b>					
<b>a) Condition &amp; : Southwark</b>		<b>Score: Highlight as Applicable</b>			
Good Highly suitable	5	100+ Highly suitable	5		
Fair Suitable	3	40-100 Very suitable	4		
Poor Unlikely to be suitable	1	20-40 Suitable	2	Changes in levels close to tree	
Dead Unsuitable	0	10-20 Just suitable	1		
Dying/dangerous* Unsuitable	0	<10* Unsuitable	0		
* Relates to existing context and is intended to apply to severe irremediable defects only		*Includes trees which are an existing or near future nuisance			
<b>b) Retention span (in years) &amp; suitability for TPO</b>					
Very large trees with some visibility / prominent large trees	5	Highly suitable			
Large trees, or medium trees clearly visible to the public	4	Suitable			
Medium trees, or large trees with limited view only	3	Suitable	Crown visible from Mina road		
Young, small, or medium/large trees visible only with difficulty	2	Barely Suitable			
Trees not visible to the public, regardless of size	1	Probably Unsuitable			
<b>c) Relative public visibility &amp; suitability for TPO</b>					
Principal components of arboricultural features, or veteran trees	5				
Tree groups, or members of groups important for their cohesion	4				
Trees with identifiable historic, commemorative or habitat importance	3	Native Wild Cherry with nesting birds present. Significant screening amenity			
Trees of particularly good form, especially if rare or unusual	2				
Trees with none of the above additional redeeming features	1				
<b>d) Other factors ( Trees must have accrued 7 or more points (with no zero score) to qualify)</b>					
5) Immediate threat to tree	5	Adjacent land owner has employed a tree surgeon to remove the tree. Local opposition to removal.			
3) Foreseeable threat to tree	3				
2) Perceived threat to tree	2				
1) Precautionary only	1				
<b>Part 2: Expediency assessment (Trees must have accrued 9 or more points to qualify)</b>					
		Notes:			
5) Immediate threat to tree	5	Adjacent land owner has employed a tree surgeon to remove the tree. Local opposition to removal.			
3) Foreseeable threat to tree	3				
2) Perceived threat to tree	2				
1) Precautionary only	1				
<b>Part 3: Decision guide</b>					
Any 0 Do not apply TPO	Overall Score:	16	Date:		
1-6 TPO indefensible			TPO Served:		
7-11 Does not merit TPO	Recommend:	TPO			
12-15 TPO defensible		Do Not TPO	Confirmed:		
16+ Definitely merits TPO	Date:				

## APPENDIX D: Photos and Photomontages





### Prior to Removal



## APPENDIX E:

### Arboricultural Reports for both parties.

#### In Support:

TOWN & COUNTRY PLANNING ACT 1990

TOWN & COUNTRY PLANNING (TREE PRESERVATION) (ENGLAND) REGULATIONS 2012

**The London Borough of Southwark Tree Preservation Order (No.747) 2025 (79 and 93 Mina Road and Land Rear 83 Mina Road, London, SE17 2QS)**

I refer to the above Tree Preservation Order, (the Order) and by way of this letter am making a formal representation on your behalf in support of protecting the **Wild Cherry tree (*Prunus avium* T2)** to the immediate north west of your property, 100 Albany Road. This representation is made in accordance with Regulation 6 of the Town & Country Planning (Tree Preservation) (England) Regulations 2012 (the Regulations).

I support the Order on the grounds that, in my opinion, *(i)* no significant defects were observed at the time of my tree inspection that would justify removal on health and safety grounds *(ii)* that it is expedient in the interests of wider public amenity to protect the tree

#### *(i) Tree inspection findings (refer to attached Tree Survey Schedule for further details)*

A Visual Tree Assessment (VTA) following the methodology of Mattheck & Breoler<sup>1</sup> was conducted to evaluate the tree's health and structural condition. Although the tree is located within a confined area with raised surface roots, the assessment did not indicate any signs of significant structural weakness, decay or biomechanical failure. The tree exhibits adaptive growth responses, demonstrating robust structural integrity and continued vitality, confirming its suitability for retention and protection.

While recent branch removal to the north has resulted in an imbalanced crown shape, this can be addressed through limited crown reduction pruning (subject to Council approval following confirmation of the Order) which can be undertaken in accordance with good arboricultural practice and within the scope of BS3998:2010 'Tree work – recommendations' without significantly affecting overall amenity. By making the Order, any future application to remove the tree would need to be supported by appropriate reasons and accompanied by appropriate evidence from a tree professional.

<sup>1</sup> *The Body Language of Trees – A handbook for failure analysis by Claus Mattheck and Helge Breloer - Research for Amenity trees No 4, 1994, HMSO Books*

**(ii) Amenity value & threat of removal**

The tree plays a significant role in the local environment, offering aesthetic appeal and ecological benefits such as biodiversity support, air quality improvement, and shading. As a prominent landscape feature, its removal would result in a considerable loss to both the visual and environmental character of the area.

Given the immediate threat of removal, I support the Council's decision to make the Order and agree with the results of their systematised assessment (9/5/2025) of suitability using the TEMPO methodology.

In summary therefore, I formally support the making and confirmation of the Order in respect of the Wild Cherry T2 on the basis that it is worthy of protection and that it expedient in the interests of amenity to do so.

Yours sincerely,

James Hedges MICFor, FARBorA, DipArb (RFS), TechCert.(Arbor.A)  
Chartered Arboriculturist and LANTRA certified Professional Tree Inspector

## Hedges Tree Consultants Ltd

TREE SURVEY SCHEDULE - Land Rear 83 Mina Road										
TPO No.747 (2025) London Borough of Southwark										
Notes:										
Site attached KEY										
All measurements are approximate										
Client: Eisce Roinne										
Address: 100 Albany Road, SE17 2QS										
Tel: 020 7920 2225										
Email: <a href="mailto:Ward@Cry.org.uk">Ward@Cry.org.uk</a> (specify website)										
Inspected By: J Hedges Cpl(ArbFRS)										
Tagged: No										
Tree ID #	Species	Height m	1.5m stem diameter mm	Est. NEW Branch spread m	Age class	Target	Vitality	Condition	Recommendations (following Client discussion of options for tree retention)	
T2 on TPO T47 016 Tree	Wild Cherry (Prunus avium)	13.0	380	4.0, 5.7, 6.5	EM	Moderate	Good	Observation: slender tree, no significant defects visible. Trunk: straight, free from major cracks, no signs of ground level damage. Stem diameter at 1.5m height: 380mm. Roots: no signs of root flare plateaus (tree appears stable in soil). Soil: no signs of significant soil compaction or water stress. Substantial raised surface roots (reflect soil). Lower trunkounding did not indicate any significant defects. Bark: smooth, grey-brown, no signs of significant elevation on stem and surface (root) horn. Holes / adaptive spur growth: no signs of significant damage or disease. Crown: main trunk appears stable (stems from horn partially obscured by live horn - pruned but did not identify any significant defects). Upright crown shape, no signs of significant defects. Pruning: no signs of significant pruning (e.g. no signs of 10cm diameter from 3.5m to 7m north / north east. Truncating pruning visible on the main trunk, no signs of significant pruning wound north. Previously severed live in crown restraining fall of branches. No signs of significant damage or disease encountering upon pruning (grape to east). Previously copped raised with multiple pruning wounds / stubs / 10cm diameter at 1.8m. No signs of crown decay.	Confidential and sensitive information - do not share with anyone outside the Council. If you need to share this information with another person, please contact the Environment and Sustainability team to arrange further inspection - formal inspection recommended and a formal inspection report issued. Branches: remove dead, diseased or damaged branches - large pruned. Cross it to ensure the tree is not under stress. Remove any Reduce height and radial crown spread by approximately 20m, to appropriate height and width. Remove any dead, diseased or damaged branches - small pruned. Remove radial branch spread of 4-5m (on comparison). Stems: pruning operations should ideally be timed to avoid assessment - timing cards linked to this will be assessment - timing cards	Priority of work



## In Objection:

Job Ref.:	31194-L
Survey Date:	16/05/2025
Report Date:	20/05/2025
Rev. No.:	-
Checked By:	RH

GraftinGardeners Ltd  
45 Swanwick Close  
London  
SW15 4ES

t: 020 8123 7653  
m: 07845 816425

e: info@graftingardeners.co.uk

## 4 The Subject Tree

4.1.1 The individual tree stock within the site was observed in species, age, and size. The surveyed tree was deemed to be of low amenity/landscape value with the tree appearing to be in poor vigour at the time of the inspection. (Please see Appendix 3 for tree work recommendations within the Tree Survey Schedule).

### Tree Safety Survey & Report

Ref.	Species	Description	Measurements	Survey Notes	Overall Condition	Inspect Period	Recommendations
T1	Cherry 'Culinary Variety' ( <i>Prunus</i> sp. Cherry)	Owned by the estate.	Height (m): 9 Crown Radius (m): 4 DBH (cm): 40 Life Stage: Mature Life Exp.: <10 years	<p>Structural and physiological condition is poor. The tree exhibits multiple historic pruning wounds at least five significant cuts back to the main stem between approximately 2m and 3m in height which have resulted in notable decay and deadwood formation at the pruning sites. These defects raise legitimate concerns over the tree's long-term viability and safety.</p> <p>In addition, due to recent tree pruning works undertaken under permitted approval and in accordance with a subvention to the Council, the tree now exhibits notable asymmetry, with the remaining crown heavily biased over the client's property. This structural imbalance not only reduces the tree's visual and amenity value but may also increase the likelihood of mechanical stress and failure, particularly under adverse weather conditions.</p> <p>The tree is also growing in suboptimal soil conditions, with evidence of metal debris, brick fragments, rubble, and loosely compacted substrate, all of which provide a poor rooting environment. Although the tree has shown some ability to acclimate, it is clear that the root system has outgrown its immediate setting. It is currently exerting pressure on nearby structures, having already contributed to the failure of retaining brick walls, which are now leaning and collapsing. This structural disturbance not only weakens the tree's anchorage but presents a tangible risk to surrounding built infrastructure.</p>	Poor	1 Year	Fell tree Timescale: 16-May-2026 (1 Year)

Additional: While various nest structures are present within the canopy, likely constructed by corvid species such as crows or magpies, these nests were observed during a formal watching brief and were determined to be dormant. During a 15-minute observation period, no birds were seen entering or leaving the nests, nor did any individuals display territorial or defensive behaviour, which would typically be expected if the nests were active or in use.

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KEY ISSUES FOR CONSIDERATION.....	2
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<b>Meeting Name:</b>	Planning Committee (Smaller Applications)
<b>Date:</b>	15 October 2025
<b>Report title:</b>	Confirmation of TPO 748 153 Turney Road London Southwark SE21 7JU
<b>Ward(s) or groups affected:</b>	Dulwich Village
<b>Classification:</b>	Open
<b>Reason for lateness (if applicable):</b>	Not Applicable
<b>From:</b>	Director of Planning and Growth

## RECOMMENDATION

1. That the provisional TPO reference 748 be confirmed, unamended.

## BACKGROUND INFORMATION

2. A Tree Preservation Order ('TPO') was served, by hand, on a provisional basis, by the Urban Forester following a notification to remove two Lime trees to accommodate a garden shed along with pruning works to a Pittosporum (Mock Orange).
3. The order was issued to all affected parties at the address noted above in the report title along with neighbouring properties with land boundaries within the canopies of the trees and served by hand on 20 May 2025.
4. Two objections to the TPO have subsequently been received, which according to the Council's standing orders must be considered at planning committee before the order can be confirmed.
5. Representations received during the consultation period are outlined within the report at paragraphs [19-26].
6. The TPO must be confirmed within six months of the date in which the Order came into force (20 November 2025) to prevent expiration of the provisions in accordance with the regulations (Town and Country (Tree Preservation) (England) Regulations 2012).

## KEY ISSUES FOR CONSIDERATION

7. To continue to have effect the TPO must be confirmed within 6 months from the date of being served.

8. The trees were assessed as attaining a score of 15 for the Corsican Pine and 16 for the Limes (out of a potential total 25) under the Tree Evaluation Method for Tree Preservation Orders (TEMPO), with officers paying due regard to the condition and life expectancy of the trees, together with their comparative visibility and resulting in a decision guide indicating that the making of a TPO is defensible in respect of both trees, and in the case of the Limes, definitely merited.
9. The confirmation of a TPO cannot be appealed. However, any subsequent refusal of an application for works to a TPO or imposition of conditions upon consent can be appealed to the Secretary of State via the Planning Inspectorate.
10. Anyone proposing to carry out works to a tree or trees subject to a TPO must seek permission from the local planning authority. This involves completing an application form identifying the trees, detailing the works proposed and explaining the reasons for the works. The council's planning officer will usually inspect the trees prior to making a decision and may recommend alternative works or refuse consent. If authorisation is given to fell a protected tree, a new tree will usually be required to be planted as a replacement. However, this will in turn require a new TPO to be served.
11. If a tree protected by a TPO is felled, pruned or wilfully damaged without consent, both the person who carried out the works and the tree owner are liable to be fined up to £20,000 through the Magistrates Court or, if taken to the Crown Court, an unlimited fine. There are exceptional circumstances, such as when a tree is dead, dying or dangerous, when permission is not required. However, in order to avoid the risk of prosecution advice must be sought from the council and five days notice given before carrying out any works (except in an emergency).
12. Where the council is notified that an exception applies, this is duly verified by the council's planning officer upon receipt. Where the exception does not apply, the council may request that the works follow the standard TPO procedure or, if necessary, seek injunctive relief in the crown courts.

## **Policy context**

13. The law on Tree Preservation Orders is in Part VIII of the Town and Country Planning Act 1990 as amended (the 'Act') and in the Town and Country Planning (Tree Preservation) (England) Regulations 2012.
14. Section 198 of the Act imposes a duty on the local planning authority to ensure the preservation and protection of trees whenever appropriate.
15. Priority 3 of the Council's Climate Change Strategy, with particular reference to the Southwark Nature Action Plan (SNAP) (2020); sets out the vision and strategy for the continued protection, conservation and enhancement of nature in the borough. "Southwark will continue to ensure protection of trees and woodlands subject to Tree Preservation Orders, in Conservation Areas and

Sites of Importance for Nature Conservation, with trees to be retained on development sites and to require high standards of replacement tree planting. (1.18 Biodiversity and Trees (SNAP) (2020))”

16. London Plan Policy G7 Trees and woodlands states that trees and woodlands should be protected, maintained, and enhanced, following the guidance of the London Tree and Woodland Framework.
17. Policy P61 of the Southwark Plan (7) states:  
In exceptional circumstances removal of trees protected by TPO or conservation area status will be permitted where sufficient evidence has been provided to justify their loss. Replacement planting will be expected where removal is agreed. The replacement of TPO trees must take into account the loss of canopy cover as measured by stem girth and biodiversity value.
18. The current recommendation supports the relevant national legislation, London and Southwark policies to retain trees with proven amenity value.

### **Objection to the order**

19. Representations in objection to the Order have been received from the property owners at Number 2 Roseway and 153 Turney Road.
20. The basis of the objections are that the Lime trees are of little visual amenity and require removal to construct a sunken garden outbuilding which is to be constructed under a certificate of lawful development.
21. **24/AP/2535**, a Certificate of Lawful Development (Proposed) for the erection of a rear garden single storey outbuilding (Garden Shed), for the incidental use and enjoyment of the occupiers of the dwellinghouse was granted but did not highlight any trees to be removed. Upon review it would appear that the construction would also present an engineering operation under Section 55 of the ‘Act’ and so require planning permission.
22. A 2023 application was granted subject to conditions for tree protection (**23/AP/0044** Construction of a rear extension on the ground floor, glazed openings at ground and first floor to the north elevation and new door and window in the entrance porch) with the pleached Limes noted as showing exemplary arboricultural practice and are categorised as B by the consultant of MODERATE amenity value and an expected retention span of 40 years within the landscape. T1, the Corsican Pine was recorded as a Category A specimen.
23. Since making the Order, in July of 2025, Officers noted breaches of tree protection at site with materials and storage located within the root protection area ‘RPA’ of T1 and a lack of tree protection fencing employed at the site **[see Appendix D]**
24. Regarding the location and principle of development of the sunken outbuilding, it is this Officer’s opinion that, due to the reduction in levels, the works require planning permission and that, in any event, there would be ample scope within the garden to locate the outbuilding outside of the RPA’s of these trees and

also away from the Corsican Pine.

25. It is therefore the recommendation of the Officer that in regards to sections 197 (a), (b) and section 198 of the 'Act' that, in the interests of proper planning, that, in the granting of a planning permission, provision was made for the preservation of these trees which make a positive contribution to the local environment and have been assessed by the Tree Evaluation Method for Preservation Orders (TEMPO).
26. Should the recommendation be accepted and the order confirmed then an application to carry out works can be submitted in the usual way with consent or refusal considered on the basis of any further evidence provided. Further, if a scheme is deemed acceptable at full planning, then on the granting of a planning permission, a TPO could be annulled if it is required to facilitate development.

## **Financial implications**

27. Should the local authority refuse consent for works to trees protected by an Order or grant consent subject to conditions, the council has a potential liability for compensation. Any compensation may relate either to loss or damage which results from the decision of the council. Therefore, there is a risk that the proposed Order will make the council liable to compensation claims. Because circumstances vary widely, it is not possible to gauge the magnitude of such claims. In any event, no claim can be made for loss or damage incurred before an application for consent to undertake work on a protected tree was made, nor is any compensation payable for loss of development value or other diminution in the value of land.
28. Any claim for compensation will be dealt with through the council's official complaints procedure and it is anticipated that any award would be contained within the planning division's budget. This position will be monitored and if the award cannot be contained within existing departmental revenue budgets will be reflected in the council's revenue budget monitoring arrangements for funding from council reserves.
29. Any potential drawdown from council reserves for the payment of compensation claims will be subject to agreement by the relevant cabinet member, or full cabinet in the case of claims over £50,000.
30. Staffing and any other costs connected with this recommendation will be contained within existing departmental revenue budgets.

## **CONCLUSION**

31. For the reasons set out within the body of this report, it is hereby recommended that TPO 748; be confirmed, unamended.

## **Reasons for urgency**

### **Legislative requirement**

32. The TPO lapses on 20 November if not confirmed.

## BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Local Development Framework and Development Plan Documents	Planning and Growth Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 0207 525 0254 Council website: <a href="http://www.southwark.gov.uk">www.southwark.gov.uk</a>
TPO guidance <a href="https://www.gov.uk/guidance/tree-preservation-orders-and-trees-in-conservation-areas#confirming-tree-preservation-orders">https://www.gov.uk/guidance/tree-preservation-orders-and-trees-in-conservation-areas#confirming-tree-preservation-orders</a>	Online	NA
Southwark Council TPO information <a href="http://www.southwark.gov.uk/environment/trees/tree-preservation-orders-and-conservation-areas">http://www.southwark.gov.uk/environment/trees/tree-preservation-orders-and-conservation-areas</a>	Online	NA
Southwark TPO register <a href="https://geo.southwark.gov.uk/connect/analyst/mobile/#/main?mapcfg=Southwark%20Design%20and%20Conservation&amp;overlays=TPO%20zones">https://geo.southwark.gov.uk/connect/analyst/mobile/#/main?mapcfg=Southwark%20Design%20and%20Conservation&amp;overlays=TPO%20zones</a>	Online	NA

## APPENDICES

No.	Title
Appendix A	Provisional TPO 748
Appendix B	Map
Appendix C	TEMPO
Appendix D	Photos and Photomontages

## AUDIT TRAIL

<b>Lead Officer</b>	Stephen Platts, Director of Planning and Growth	
<b>Report Author</b>	Liam Bullen, Senior Planner – Urban Forester	
<b>Version</b>	Final	
<b>Dated</b>	29 September 2025	
<b>Key Decision</b>	No	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>		
Officer Title	Comments Sought	Comments included
Assistant Chief Executive - Governance and Assurance	No	No
Strategic Director, Resources	No	No
Strategic Director, Environment, Sustainability and Leisure	No	No
<b>Date final report sent to Constitutional Team</b>		29 September 2025

**IMPORTANT - THIS COMMUNICATION MAY AFFECT YOUR PROPERTY**

**TOWN AND COUNTRY PLANNING ACT 1990  
TOWN AND COUNTRY PLANNING (TREE PRESERVATION) (ENGLAND)  
REGULATIONS 2012**

**London Borough of Southwark  
Tree Preservation Order (No. 748) 2025**

153 Turney Road London Southwark SE21 7JU

THIS IS A FORMAL NOTICE to let you know that on the 20<sup>th</sup> May 2025 the Council made the above tree preservation order.

A copy of the order is enclosed. In simple terms, it prohibits anyone from cutting down, topping or lopping any of the trees described in the Schedule and shown on the plan, without the local planning authority's consent.

Some explanatory guidance on tree preservation orders is available via <https://www.gov.uk/guidance/tree-preservation-orders-and-trees-in-conservation-areas#tree-preservation-orders--general>.

The Council has made the order under the provisions laid out in s.198 of the Town and Country Planning Act 1990 (as amended).

The order took effect on a provisional basis on 20<sup>th</sup> May 2025. It will continue in force on this basis for a further 6 months or until the order is confirmed by the Council, whichever first occurs.

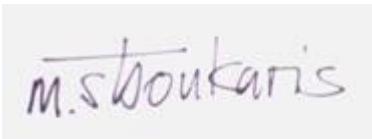
The Council will consider whether the order should be confirmed, that is to say, whether it should take effect permanently. Before this decision is made, the people affected by the order have a right to make objections or other representations about any of the trees, groups of trees or woodlands covered by the order.

If you would like to make any representations, please make sure we receive them in writing within 28 days of this date of this notice (17:00 18/06/2025). Your comments must comply with regulation 6 of the Town and Country Planning (Tree Preservation) (England) Regulations 2012, a copy of which is provided. Send your comments to London Borough of Southwark, (Ref TPO/748), 160 Tooley Street, PO Box 64529, London SE1P 5LX. All valid objections or representations are carefully considered before a decision on whether to confirm the order is made. Additional information regarding tree preservation orders can be found at <https://www.southwark.gov.uk/environment/trees/tree-preservation-orders-and-conservation-areas>

The Council will write to you again when that decision has been made. In the meantime, if you would like any further information or have any questions about this notification, please contact the Urban Forestry team on 0207 525 5338.

Dated 20<sup>th</sup> May 2025

Signed on behalf of the London Borough of Southwark



Michael Tsoukaris MSc(Arch) MSc(CVS) RIBA  
Group Manager, Design, Conservation and Transport Policy  
Authorised by the Council to sign in that behalf

London Borough of Southwark  
160 Tooley Street  
PO Box 64529  
London SE1P 5LX

**Regulation 6 of the Town and Country Planning (Tree Preservation) (England) Regulations 2012**

*Objections and representations*

*6(1) Subject to paragraph (2), objections and representations—*

*(a) shall be made in writing and—*

- (i) delivered to the authority not later than the date specified by them under regulation 5(2)(c); or*
- (ii) sent to the authority in a properly addressed and pre-paid letter posted at such time that, in the ordinary course of post, it would be delivered to them not later than that date;*

*(b) shall specify the particular trees, groups of trees or woodlands (as the case may be) in respect of which such objections and representations are made; and*

*(c) in the case of an objection, shall state the reasons for the objection.*

*6(2) The authority may treat as duly made objections and representations which do not comply with the requirements of paragraph (1) if, in the particular case, they are satisfied that compliance with those requirements could not reasonably have been expected.*

Tree Preservation Order

Town and Country Planning Act 1990

The Tree Preservation Order (TPO Number 748) 2025

The London Borough of Southwark in exercise of the powers conferred on them by section 198 of the Town and Country Planning Act 1990 make the following Order—

**Citation**

1. This Order may be cited as Tree Preservation Order (TPO Number 748) 2025.

**Interpretation**

2.— (1) In this Order “the authority” means the London Borough of Southwark  
 (2) In this Order any reference to a numbered section is a reference to the section so numbered in the Town and Country Planning Act 1990 and any reference to a numbered regulation is a reference to the regulation so numbered in the Town and Country Planning (Tree Preservation)(England) Regulations 2012.

**Effect**

3.— (1) Subject to article 4, this Order takes effect provisionally on the date on which it is made.  
 (2) Without prejudice to subsection (7) of section 198 (power to make tree preservation orders) or subsection (1) of section 200 (tree preservation orders: Forestry Commissioners) and, subject to the exceptions in regulation 14, no person shall—  
 (a) cut down, top, lop, uproot, wilfully damage, or wilfully destroy; or  
 (b) cause or permit the cutting down, topping, lopping, uprooting, wilful damage or wilful destruction of,

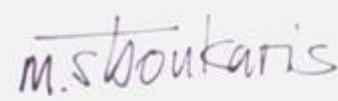
any tree specified in the Schedule to this Order except with the written consent of the authority in accordance with regulations 16 and 17, or of the Secretary of State in accordance with regulation 23, and, where such consent is given subject to conditions, in accordance with those conditions.

**Application to trees to be planted pursuant to a condition**

4. In relation to any tree identified in the first column of the Schedule by the letter “C”, being a tree to be planted pursuant to a condition imposed under paragraph (a) of section 197 (planning permission to include appropriate provision for preservation and planting of trees), this Order takes effect as from the time when the tree is planted.

Dated 20<sup>th</sup> May 2025

Signed on behalf of the London Borough of Southwark



Michael Tsoukaris MSc(Arch) MSc(CVS) RIBA  
 Group Manager, Design, Conservation and Transport Policy  
 Authorised by the Council to sign in that behalf

## CONFIRMATION OF ORDER

This Order was confirmed by London Borough of Southwark without modification on the \_\_\_\_\_ day of \_\_\_\_\_

*OR*

This Order was confirmed by the London Borough of Southwark, subject to the modifications indicated by \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_

Signed on behalf of the London Borough of Southwark

.....

Authorised by the Council to sign in that behalf]

## DECISION NOT TO CONFIRM ORDER

A decision not to confirm this Order was taken by London Borough of Southwark on the \_\_\_\_\_ day of \_\_\_\_\_

Signed on behalf of the London Borough of Southwark

.....

Authorised by the Council to sign in that behalf

## VARIATION OF ORDER

This Order was varied by the London Borough of Southwark on the \_\_\_\_\_ day of \_\_\_\_\_ by a variation order under reference number \_\_\_\_\_ a copy of which is attached

Signed on behalf of the London Borough of Southwark

.....

Authorised by the Council to sign in that behalf

## REVOCATION OF ORDER

This Order was revoked by the London Borough of Southwark on the \_\_\_\_\_ day of \_\_\_\_\_

Signed on behalf of the London Borough of Southwark

.....

Authorised by the Council to sign in that behalf

**SCHEDULE**  
**Specification of trees**

**Tree specified as an Individual**  
**(within a black circle on the map)**

<i>Reference on map</i>	<i>Description</i>	<i>Situation</i>
T1	Corsican Pine	Rear 153 Turney Road

**Trees specified as a Group**  
**(within a broken black line on the map)**

<i>Reference on map</i>	<i>Description</i>	<i>Situation</i>
G1	3 x Pleached (Espalier) Lime Trees	Boundary with 151 Turney Rd

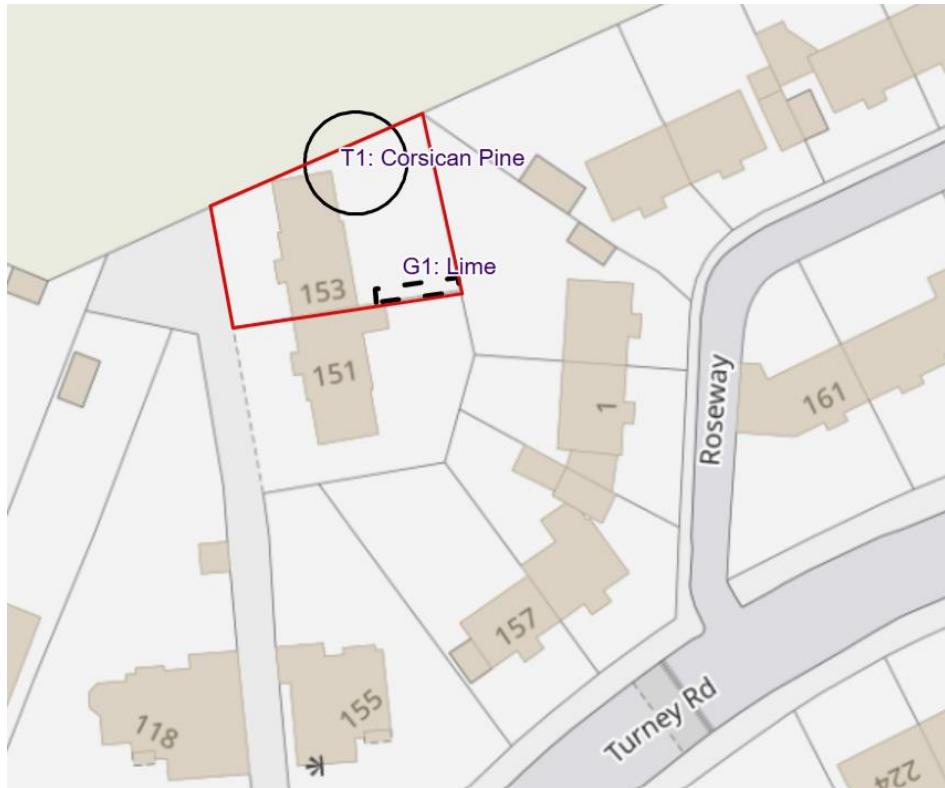
**Trees specified as an Area**  
**(within a dotted black line on the map)**

<i>Reference on map</i>	<i>Description</i>	<i>Situation</i>
None		

**Tree specified as a Woodland**  
**(within a continuous black line on the map)**

<i>Reference on map</i>	<i>Description</i>	<i>Situation</i>
None		

## PLAN



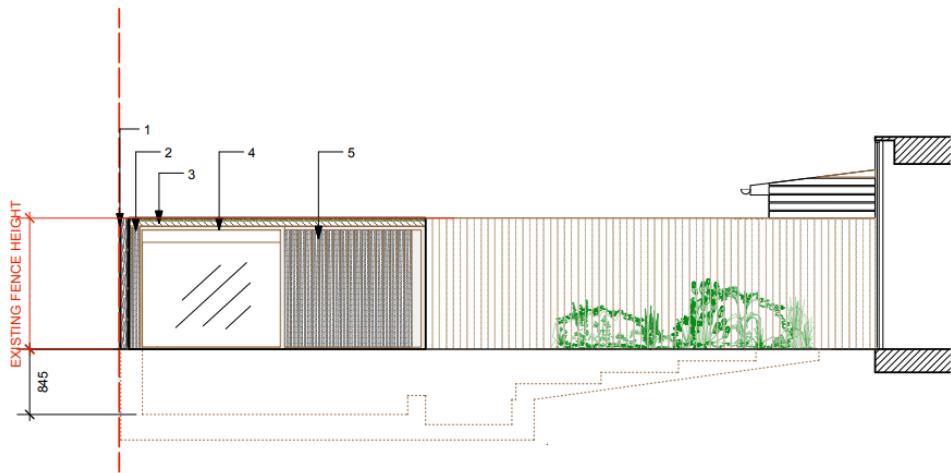
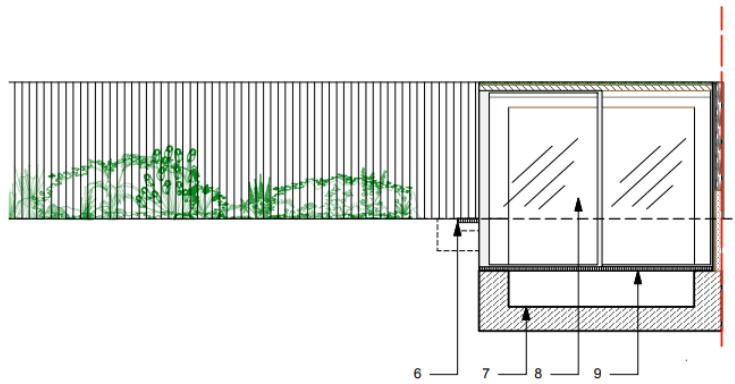
T1: Corsican Pine



G1: Lime



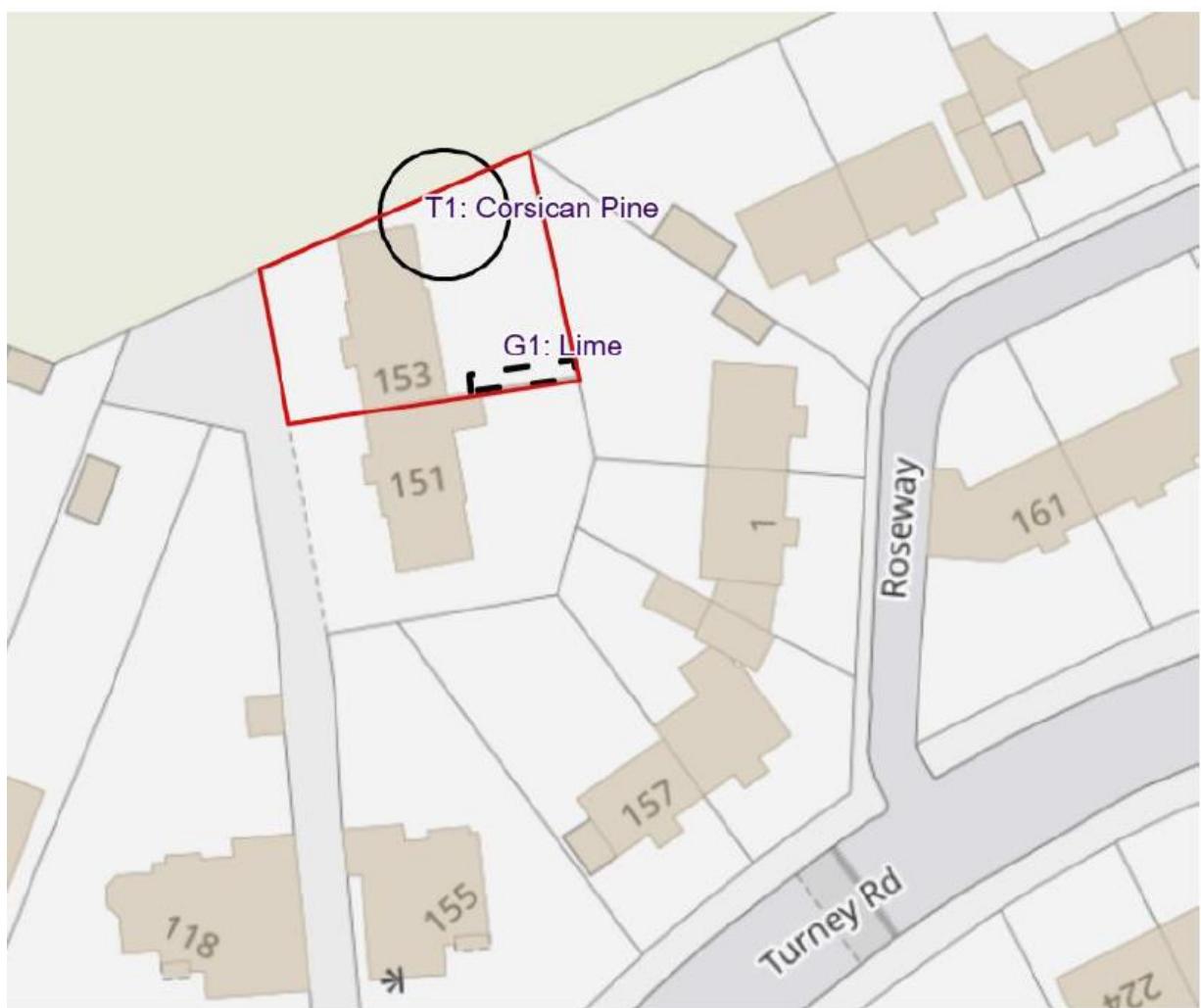
24/AP/2535

2. NORTH - SIDE ELEVATION4. WEST - FRONT ELEVATION

TREE EVALUATION METHOD FOR PRESERVATION ORDERS (TEMPO)					
Survey Data Sheet & Decision Guide					
Date:	20.05.2025	Surveyor:	LB		
<b>Tree details</b>					
TPO Ref (if applicable):	748	Tree/Group No:	T1	Species:	Corsican Pine
Location: 153 Turney Road					
REFER TO GUIDANCE NOTE FOR ALL DEFINITIONS					
<b>Part 1: Amenity London</b>			Score: Highlight as Applicable		
<b>a) Condition &amp; : Southwark</b>			<b>b) Retention span (in years) &amp; suitability for TPO</b>		
Good Highly suitable	5		100+ Highly suitable	5	
Fair Suitable	3		40-100 Very suitable	4	
Poor Unlikely to be suitable	1		20-40 Suitable	2	
Dead Unsuitable	0		10-20 Just suitable	1	
Dying/dangerous* Unsuitable	0		<10* Unsuitable	0	
* Relates to existing context and is intended to apply to severe irremediable defects only		*Includes trees which are an existing or near future nuisance			
<b>c) Relative public visibility &amp; suitability for TPO</b>					
Very large trees with some visibility / prominent large trees			5	Highly suitable	
Large trees, or medium trees clearly visible to the public			4	Suitable	
Medium trees, or large trees with limited view only			3	Suitable	
Young, small, or medium/large trees visible only with difficulty			2	Barely Suitable	Top of Crown visible from public realm
Trees not visible to the public, regardless of size			1	Probably Unsuitable	
<b>d) Other factors ( Trees must have accrued 7 or more points (with no zero score) to qualify)</b>					
Principal components of arboricultural features, or veteran trees			5		
Tree groups, or members of groups important for their cohesion			4		
Trees with identifiable historic, commemorative or habitat importance			3		
Trees of particularly good form, especially if rare or unusual			2		
Trees with none of the above additional redeeming features			1		
<b>Part 2: Expediency assessment (Trees must have accrued 10 or more points to qualify)</b>					
5) Immediate threat to tree	5	Notes:			
3) Foreseeable threat to tree	3				
2) Perceived threat to tree	2	Proposed development in rear garden			
1) Precautionary only	1				
<b>Part 3: Decision guide</b>					
Any 0 Do not apply TPO	Overall Score:	15		Date:	
1-6 TPO indefensible			TPO Served:		
7-11 Does not merit TPO	Recommend:	TPO			
12-15 TPO defensible		Do Not TPO	Confirmed:		
16+ Definitely merits TPO	Date:				

TREE EVALUATION METHOD FOR PRESERVATION ORDERS (TEMPO)					
Survey Data Sheet & Decision Guide					
Date:	20.05.2025	Surveyor:	LB		
<b>Tree details</b>					
TPO Ref (if applicable):	748	Tree/Group No:	G1	Species:	3 x Pleached Lime
Location: 153 Turney Road					
REFER TO GUIDANCE NOTE FOR ALL DEFINITIONS					
<b>Part 1: Amenity London</b>			Score: Highlight as Applicable		
<b>a) Condition &amp; : Southwark</b>			<b>b) Retention span (in years) &amp; suitability for TPO</b>		
Good Highly suitable	5		100+ Highly suitable	5	
Fair Suitable	3		40-100 Very suitable	4	
Poor Unlikely to be suitable	1		20-40 Suitable	2	
Dead Unsuitable	0		10-20 Just suitable	1	
Dying/dangerous* Unsuitable	0		<10* Unsuitable	0	
* Relates to existing context and is intended to apply to severe irremediable defects only		*Includes trees which are an existing or near future nuisance			
<b>c) Relative public visibility &amp; suitability for TPO</b>					
Very large trees with some visibility / prominent large trees			5	Highly suitable	
Large trees, or medium trees clearly visible to the public			4	Suitable	
Medium trees, or large trees with limited view only			3	Suitable	
Young, small, or medium/large trees visible only with difficulty			2	Barely Suitable	
Trees not visible to the public, regardless of size			1	Probably Unsuitable	
<b>d) Other factors ( Trees must have accrued 7 or more points (with no zero score) to qualify)</b>					
Principal components of arboricultural features, or veteran trees			5		
Tree groups, or members of groups important for their cohesion			4		
Trees with identifiable historic, commemorative or habitat importance			3	Historic boundary pleached Lime trees	
Trees of particularly good form, especially if rare or unusual			2		
Trees with none of the above additional redeeming features			1		
<b>Part 2: Expediency assessment (Trees must have accrued 10 or more points to qualify)</b>					
5) Immediate threat to tree	5	Notes:	Trees as a material consideration for planning. A Certificate of Lawful development should not have been issued for a subken outbuilding. Planning Permission Required.		
3) Foreseeable threat to tree	3				
2) Perceived threat to tree	2				
1) Precautionary only	1				
<b>Part 3: Decision guide</b>					
Any 0 Do not apply TPO	Overall Score:	16		Date:	
1-6 TPO indefensible			TPO Served:		
7-11 Does not merit TPO	Recommend:	TPO			
12-15 TPO defensible		Do Not TPO	Confirmed:		
16+ Definitely merits TPO	Date:				

## APPENDIX B: MAP



## APPENDIX C: TEMPO

TREE EVALUATION METHOD FOR PRESERVATION ORDERS (TEMPO)					
Survey Data Sheet & Decision Guide					
Date:	20.05.2025	Surveyor:	LB		
<b>Tree details</b>					
TPO Ref (if applicable):	748	Tree/Group No:	T1	Species:	Corsican Pine
Location:	153 Turney Road				
REFER TO GUIDANCE NOTE FOR ALL DEFINITIONS					
Part 1: Amenity London			Score: Highlight as Applicable		
a) Condition & : Southwark			b) Retention span (in years) & suitability for TPO		
Good Highly suitable	5		100+ Highly suitable	5	
Fair Suitable	3		40-100 Very suitable	4	
Poor Unlikely to be suitable	1		20-40 Suitable	2	
Dead Unsuitable	0		10-20 Just suitable	1	
Dying/dangerous* Unsuitable	0		<10* Unsuitable	0	
* Relates to existing context and is intended to apply to severe irremediable defects only			*Includes trees which are an existing or near future nuisance		
c) Relative public visibility & suitability for TPO					
Very large trees with some visibility / prominent large trees			5	Highly suitable	
Large trees, or medium trees clearly visible to the public			4	Suitable	
Medium trees, or large trees with limited view only			3	Suitable	
Young, small, or medium/large trees visible only with difficulty			2	Barely Suitable	Top of Crown visible from public realm
Trees not visible to the public, regardless of size			1	Probably Unsuitable	
d) Other factors (Trees must have accrued 7 or more points (with no zero score) to qualify)					
Principal components of arboricultural features, or veteran trees			5		
Tree groups, or members of groups important for their cohesion			4		
Trees with identifiable historic, commemorative or habitat importance			3		
Trees of particularly good form, especially if rare or unusual			2		
Trees with none of the above additional redeeming features			1		
Part 2: Expediency assessment (Trees must have accrued 10 or more points to qualify)					
			Notes:		
5) Immediate threat to tree		5			
3) Foreseeable threat to tree		3			
2) Perceived threat to tree		2	Proposed development in rear garden		
1) Precautionary only		1			
Part 3: Decision guide					
Any 0 Do not apply TPO		Overall Score:	15	Date:	
1-6 TPO indefensible				TPO Served:	
7-11 Does not merit TPO		Recommend:	TPO		
12-15 TPO defensible			Do Not TPO	Confirmed:	
16+ Definitely merits TPO		Date:			

TREE EVALUATION METHOD FOR PRESERVATION ORDERS (TEMPO)					
Survey Data Sheet & Decision Guide					
Date:	20.05.2025	Surveyor:	LB		
<b>Tree details</b>					
	748	Tree/Group No:	T1, T2, T3	Species:	Pleached Lime
TPO Ref (if applicable):					
Location:	153 Turney Road				
REFER TO GUIDANCE NOTE FOR ALL DEFINITIONS					
<b>Part 1: Amenity London</b>					
<b>a) Condition &amp; : Southwark</b>		<b>b) Retention span (in years) &amp; suitability for TPO</b>			
Good Highly suitable	5	100+ Highly suitable	5		
Fair Suitable	3	40-100 Very suitable	4		
Poor Unlikely to be suitable	1	20-40 Suitable	2		
Dead Unsuitable	0	10-20 Just suitable	1		
Dying/dangerous* Unsuitable	0	<10* Unsuitable	0		
* Relates to existing context and is intended to apply to severe irremediable defects only		*Includes trees which are an existing or near future nuisance			
<b>c) Relative public visibility &amp; suitability for TPO</b>					
Very large trees with some visibility / prominent large trees		5	Highly suitable		
Large trees, or medium trees clearly visible to the public		4	Suitable		
Medium trees, or large trees with limited view only		3	Suitable		
Young, small, or medium/large trees visible only with difficulty		2	Barely Suitable		
Trees not visible to the public, regardless of size		1	Probably Unsuitable		
<b>d) Other factors ( Trees must have accrued 7 or more points (with no zero score) to qualify)</b>					
Principal components of arboricultural features, or veteran trees		5			
Tree groups, or members of groups important for their cohesion		4			
Trees with identifiable historic, commemorative or habitat importance		3	Historic boundary pleached Lime trees		
Trees of particularly good form, especially if rare or unusual		2			
Trees with none of the above additional redeeming features		1			
<b>Part 2: Expediency assessment (Trees must have accrued 10 or more points to qualify)</b>					
5) Immediate threat to tree	5	Notes: Trees as a material consideration for planning. A Certificate of Lawful development should not have been issued for a subken outbuilding. Planning Permission Required.			
3) Foreseeable threat to tree	3				
2) Perceived threat to tree	2				
1) Precautionary only	1				
<b>Part 3: Decision guide</b>					
Any 0 Do not apply TPO	Overall Score:	16		Date:	
1-6 TPO indefensible			TPO Served:		
7-11 Does not merit TPO	Recommend:	TPO			
12-15 TPO defensible		Do Not TPO	Confirmed:		
16+ Definitely merits TPO	Date:				

**APPENDIX D**

Materials and Storage within Root Protection Area of T1: 07 July 2025



Untitled



T1: Corsican Pine



G1: Lime



# Agenda Item 8.

## Contents

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<b>Meeting Name:</b>	Planning Committee (Smaller Applications)
<b>Date:</b>	15 October 2025
<b>Report title:</b>	Confirmation of TPO 752  Old Salt Quay 163 Rotherhithe Street London SE16 5QU
<b>Ward(s) or groups affected:</b>	Surrey Docks
<b>Classification:</b>	Open
<b>Reason for lateness (if applicable):</b>	Not Applicable
<b>From:</b>	Director of Planning and Growth

## RECOMMENDATION

1. That the provisional TPO reference 752 be confirmed, with the following amendments. Update to Map and Schedule. Variation from Group to Individual Order.

## BACKGROUND INFORMATION

2. A Tree Preservation Order ('TPO') was served, by hand, on a provisional basis, by the Urban Forester following receipt of a complaint from two near neighbours, a local Pastor, the Ward Councillor and a request from the Tree Services Manager due to the removal of trees at Old Salt Quay surrounding the public house.
3. The land in question is a Southwark Freehold demised on a long lease (200 years) to the occupier, Greene King, a subsidiary of CK Asset Holdings.
4. The order was issued to all affected parties at the address noted above in the report title along with the council's tree services team and served by hand on 27 May 2025.
5. An objection to the TPO has subsequently been received, which according to the Council's standing orders must be considered at planning committee before the order can be confirmed.
6. Representations received during the consultation period are outlined within the report at paragraphs [21-31].
7. The TPO must be confirmed within six months of the date in which the Order came into force (27 November 2025) to prevent expiration of the

provisions in accordance with the regulations (Town and Country (Tree Preservation) (England) Regulations 2012).

## KEY ISSUES FOR CONSIDERATION

8. To continue to have effect the TPO must be confirmed within 6 months from the date of being served.
9. The trees were re-assessed as attaining a score of 17 (out of a potential total 25) under the Tree Evaluation Method for Tree Preservation Orders (TEMPO), with officers paying due regard to the condition and life expectancy of the trees, together with their comparative visibility and resulting in a decision guide indicating that the making of a TPO is definitely merited.
10. For the avoidance of doubt, the Order protects all trees, tree stumps and tree pits located at the site.
11. The confirmation of a TPO cannot be appealed. However, any subsequent refusal of an application for works to a TPO or imposition of conditions upon consent can be appealed to the Secretary of State via the Planning Inspectorate.
12. Anyone proposing to carry out works to a tree or trees subject to a TPO must seek permission from the local planning authority. This involves completing an application form identifying the trees, detailing the works proposed and explaining the reasons for the works. The council's planning officer will usually inspect the trees prior to making a decision and may recommend alternative works or refuse consent. If authorisation is given to fell a protected tree, a new tree will usually be required to be planted as a replacement. However, this will in turn require a new TPO to be served.
13. If a tree protected by a TPO is felled, pruned or wilfully damaged without consent, both the person who carried out the works and the tree owner are liable to be fined up to £20,000 through the Magistrates Court or, if taken to the Crown Court, an unlimited fine. There are exceptional circumstances, such as when a tree is dead, dying or dangerous, when permission is not required. However, in order to avoid the risk of prosecution advice must be sought from the council and five days notice given before carrying out any works (except in an emergency).
14. Where the council is notified that an exception applies, this is duly verified by the council's Planning Officer upon receipt. Where the exception does not apply, the council may request that the works follow the standard TPO procedure or, if necessary, seek injunctive relief in the crown courts.

## Policy context

15. The law on Tree Preservation Orders is in Part VIII of the Town and Country Planning Act 1990 as amended (the 'Act') and in the Town and Country Planning (Tree Preservation) (England) Regulations 2012.

16. Section 198 of the Act imposes a duty on the local planning authority to ensure the preservation and protection of trees whenever appropriate.
17. Priority 3 of the council's climate change strategy, with particular reference to the Southwark Nature Action Plan (SNAP) (2020); sets out the vision and strategy for the continued protection, conservation and enhancement of nature in the borough. "Southwark will continue to ensure protection of trees and woodlands subject to Tree Preservation Orders, in Conservation Areas and Sites of Importance for Nature Conservation, with trees to be retained on development sites and to require high standards of replacement tree planting. (1.18 Biodiversity and Trees (SNAP) (2020))"
18. London Plan Policy G7 Trees and woodlands states that trees and woodlands should be protected, maintained, and enhanced, following the guidance of the London Tree and Woodland Framework.
19. Policy P61 of the Southwark Plan (7) states:  
In exceptional circumstances removal of trees protected by TPO or conservation area status will be permitted where sufficient evidence has been provided to justify their loss. Replacement planting will be expected where removal is agreed. The replacement of TPO trees must take into account the loss of canopy cover as measured by stem girth and biodiversity value.
20. The current recommendation supports the relevant national legislation, London and Southwark policies to retain trees with proven amenity value.

### **Objection to the order**

21. Representation in objection to the Order has been received from Knights acting on behalf of Greene King. Three representations in the support of the Order have been made by local residents and a local Pastor, and also from the council's Tree Services Manager who sits within the environment and leisure department. One of the ward councillors has expressed concern regarding the loss of trees at this location.
22. The basis of the objection are that the trees are causing damage to the hard surfacing and need to be removed on health and safety grounds. That there was no conditional requirement to retain the trees post 3 years of development and that the occupier may undertake works to the trees as they see fit.
23. It is accepted that the leaseholder and any subsequent party is to keep the whole of the demised premises in good and substantial repair under the terms of the s.106 agreement. Google Streetview imagery would indicate the paving as lifted in 2021. Officer's have visited site and presented to the site occupier and their representatives alternative options to tree removal with examples within the local area, such as, the use of flexi-pave, tarmac and widening the tree pit areas; all of which accord with the council's technical document DS.501. Southwark Streetscape Design Manual.
24. It remains the contention of the council that tree removal was not necessary to enable the repair and restoration of the hard landscaping within the area.

25. The land in question is a Southwark Freehold demised on a long lease (200 years) to the occupier, Greene King, a subsidiary of CK Asset Holdings.
26. General landscaping was agreed as part of the outline planning permission for the site issued by the LDDC in October of 1993. (93/AP/9245). A s.106 agreement dated 1997 appears to be the most relevant in terms of the legal status of the site. It states that the Parking Spaces should be kept in good maintenance and repair to the reasonable satisfaction of the council. This would indicate that council approvals are required for the site.
27. The trees on site are all registered as council maintained assets. This is subject to further clarification from the Highways Department, but these Highways (Confirm) Assets are publicly viewable via Southwark's interactive mapping service although some within the site lie outside of adopted highway. In any event the land remains Southwark Freehold and has not been enfranchised.
28. From our records it would appear that 2 Horse Chestnuts were replaced by the Council circa 2012 and Limes planted to the front pre 2009. Our records show that there is a replacement tree due to be planted within the vacant pit at T1  
**[APPENDIX B, MAPS and PLANS]**
29. Since serving of the provisional order, Officer's have revisited site and attempted to reach an amicable solution in respect of tree management, however this has not been accepted by the Leaseholder.
30. As a result of the visit and subsequent discussion with the Leaseholder and a failure to reach an agreement, it is hereby recommended that an amendment be made to the schedule changing the species Robinia to Pagoda tree and varying the Order and map to better reflect the site and species within; and so confirmed.
31. Should the recommendation be accepted and the order confirmed then an application to carry out works can be submitted in the usual way with consent or refusal considered on the basis of any further evidence provided. Further, if a scheme is deemed acceptable at full planning, then on the granting of a planning permission, a TPO could be annulled.

## Financial implications

32. Should the local authority refuse consent for works to trees protected by an Order or grant consent subject to conditions, the council has a potential liability for compensation. Any compensation may relate either to loss or damage which results from the decision of the council. Therefore, there is a risk that the proposed Order will make the council liable to compensation claims. Because circumstances vary widely, it is not possible to gauge the magnitude of such claims. In any event, no claim can be made for loss or damage incurred before an application for consent to undertake work on a protected tree was made, nor is any compensation payable for loss of development value or other diminution in the value of land.

33. Any claim for compensation will be dealt with through the council's official complaints procedure and it is anticipated that any award would be contained within the planning division's budget. This position will be monitored and if the award cannot be contained within existing departmental revenue budgets will be reflected in the council's revenue budget monitoring arrangements for funding from council reserves.
34. Any potential drawdown from council reserves for the payment of compensation claims will be subject to agreement by the relevant cabinet member, or full cabinet in the case of claims over £50,000.
35. Staffing and any other costs connected with this recommendation will be contained within existing departmental revenue budgets.

## Conclusion

36. For the reasons set out within the body of this report, it is hereby recommended that TPO 752; be confirmed, with the following amendments. Update to Map and Schedule. Variation from Group to Individual Order.

## Reasons for urgency

### Legislative requirement

37. The TPO lapses on 27 November if not confirmed.

## BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Local Development Framework and Development Plan Documents	Planning and Growth Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: <a href="mailto:planning.enquiries@southwark.gov.uk">planning.enquiries@southwark.gov.uk</a> Case officer telephone: 0207 525 0254 Council website: <a href="http://www.southwark.gov.uk">www.southwark.gov.uk</a>
TPO guidance <a href="https://www.gov.uk/guidance/tree-preservation-orders-and-trees-in-conservation-areas#confirming-tree-preservation-orders">https://www.gov.uk/guidance/tree-preservation-orders-and-trees-in-conservation-areas#confirming-tree-preservation-orders</a>	Online	NA
Southwark Council TPO information <a href="http://www.southwark.gov.uk/environment/trees/tree-preservation-orders-and-">http://www.southwark.gov.uk/environment/trees/tree-preservation-orders-and-</a>	Online	NA

conservation-areas		
Southwark TPO register <a href="https://geo.southwark.gov.uk/connect/analyst/mobile/#/main?mapcfg=Southwark%20Design%20and%20Conservation&amp;overlays=TPO%20zones">https://geo.southwark.gov.uk/connect/analyst/mobile/#/main?mapcfg=Southwark%20Design%20and%20Conservation&amp;overlays=TPO%20zones</a>	Online	NA

## APPENDICES

No.	Title
Appendix A	Provisional TPO 752 Schedule and Plan Updated 29.09.2025
Appendix B	Maps and Plans Updated 29.09.2025
Appendix C	TEMPO Re Assessed 14.08.2025
Appendix D	Photos and Photomontages

## AUDIT TRAIL

<b>Lead Officer</b>	Stephen Platts, Director of Planning and Growth
<b>Report Author</b>	Liam Bullen, Senior Planner – Urban Forester
<b>Version</b>	Final
<b>Dated</b>	29 September 2025
<b>Key Decision</b>	No

### CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER

Officer Title	Comments Sought	Comments included
Assistant Chief Executive, Governance & Assurance	No	No
Strategic Director, Resources	No	No
Strategic Director, Environment, Sustainability and Leisure	No	No
<b>Date final report sent to Constitutional Team</b>		29 September 2025

**IMPORTANT - THIS COMMUNICATION MAY AFFECT YOUR PROPERTY**

**TOWN AND COUNTRY PLANNING ACT 1990  
TOWN AND COUNTRY PLANNING (TREE PRESERVATION) (ENGLAND)  
REGULATIONS 2012**

**London Borough of Southwark  
Tree Preservation Order (No. 752) 2025**

Old Salt Quay 163 Rotherhithe Street London SE16 5QU

THIS IS A FORMAL NOTICE to let you know that on the 27<sup>th</sup> May 2025 the Council made the above tree preservation order.

A copy of the order is enclosed. In simple terms, it prohibits anyone from cutting down, topping or lopping any of the trees described in the Schedule and shown on the plan, without the local planning authority's consent.

Some explanatory guidance on tree preservation orders is available via <https://www.gov.uk/guidance/tree-preservation-orders-and-trees-in-conservation-areas#tree-preservation-orders--general>.

The Council has made the order under the provisions laid out in s.198 of the Town and Country Planning Act 1990 (as amended).

The order took effect on a provisional basis on 27<sup>th</sup> May 2025. It will continue in force on this basis for a further 6 months or until the order is confirmed by the Council, whichever first occurs.

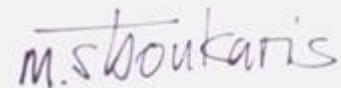
The Council will consider whether the order should be confirmed, that is to say, whether it should take effect permanently. Before this decision is made, the people affected by the order have a right to make objections or other representations about any of the trees, groups of trees or woodlands covered by the order.

If you would like to make any representations, please make sure we receive them in writing within 28 days of this date of this notice (17:00 24/06/2025). Your comments must comply with regulation 6 of the Town and Country Planning (Tree Preservation) (England) Regulations 2012, a copy of which is provided. Send your comments to London Borough of Southwark, (Ref TPO/752), 160 Tooley Street, PO Box 64529, London SE1P 5LX. All valid objections or representations are carefully considered before a decision on whether to confirm the order is made. Additional information regarding tree preservation orders can be found at <https://www.southwark.gov.uk/environment/trees/tree-preservation-orders-and-conservation-areas>

The Council will write to you again when that decision has been made. In the meantime, if you would like any further information or have any questions about this notification, please contact the Urban Forestry team on 0207 525 2090.

Dated 27<sup>th</sup> May 2025

Signed on behalf of the London Borough of Southwark



Michael Tsoukaris MSc(Arch) MSc(CVS) RIBA  
Group Manager, Design, Conservation and Transport Policy  
Authorised by the Council to sign in that behalf

London Borough of Southwark  
160 Tooley Street  
PO Box 64529  
London SE1P 5LX

**Regulation 6 of the Town and Country Planning (Tree Preservation) (England) Regulations 2012**

*Objections and representations*

6(1) *Subject to paragraph (2), objections and representations—*

*(a) shall be made in writing and—*

- (i) delivered to the authority not later than the date specified by them under regulation 5(2)(c); or*
- (ii) sent to the authority in a properly addressed and pre-paid letter posted at such time that, in the ordinary course of post, it would be delivered to them not later than that date;*

*(b) shall specify the particular trees, groups of trees or woodlands (as the case may be) in respect of which such objections and representations are made; and*

*(c) in the case of an objection, shall state the reasons for the objection.*

6(2) *The authority may treat as duly made objections and representations which do not comply with the requirements of paragraph (1) if, in the particular case, they are satisfied that compliance with those requirements could not reasonably have been expected.*

## Tree Preservation Order

Town and Country Planning Act 1990

The Tree Preservation Order (TPO Number 752) 2025

The London Borough of Southwark in exercise of the powers conferred on them by section 198 of the Town and Country Planning Act 1990 make the following Order—

**Citation**

1. This Order may be cited as Tree Preservation Order (TPO Number 752) 2025.

**Interpretation**

2.— (1) In this Order “the authority” means the London Borough of Southwark  
 (2) In this Order any reference to a numbered section is a reference to the section so numbered in the Town and Country Planning Act 1990 and any reference to a numbered regulation is a reference to the regulation so numbered in the Town and Country Planning (Tree Preservation)(England) Regulations 2012.

**Effect**

3.— (1) Subject to article 4, this Order takes effect provisionally on the date on which it is made.

(2) Without prejudice to subsection (7) of section 198 (power to make tree preservation orders) or subsection (1) of section 200 (tree preservation orders: Forestry Commissioners) and, subject to the exceptions in regulation 14, no person shall—

- (a) cut down, top, lop, uproot, wilfully damage, or wilfully destroy; or
- (b) cause or permit the cutting down, topping, lopping, uprooting, wilful damage or wilful destruction of,

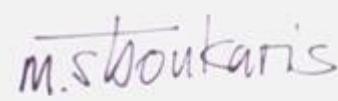
any tree specified in the Schedule to this Order except with the written consent of the authority in accordance with regulations 16 and 17, or of the Secretary of State in accordance with regulation 23, and, where such consent is given subject to conditions, in accordance with those conditions.

**Application to trees to be planted pursuant to a condition**

4. In relation to any tree identified in the first column of the Schedule by the letter “C”, being a tree to be planted pursuant to a condition imposed under paragraph (a) of section 197 (planning permission to include appropriate provision for preservation and planting of trees), this Order takes effect as from the time when the tree is planted.

Dated 27th May 2025

Signed on behalf of the London Borough of Southwark



Michael Tsoukaris MSc(Arch) MSc(CVS) RIBA  
 Group Manager, Design, Conservation and Transport Policy  
 Authorised by the Council to sign in that behalf

## CONFIRMATION OF ORDER

This Order was confirmed by London Borough of Southwark without modification on the \_\_\_\_\_ day of \_\_\_\_\_

*OR*

This Order was confirmed by the London Borough of Southwark, subject to the modifications indicated by \_\_\_\_\_, on the \_\_\_\_\_ day of \_\_\_\_\_

Signed on behalf of the London Borough of Southwark

.....

Authorised by the Council to sign in that behalf]

## DECISION NOT TO CONFIRM ORDER

A decision not to confirm this Order was taken by London Borough of Southwark on the \_\_\_\_\_ day of \_\_\_\_\_

Signed on behalf of the London Borough of Southwark

.....

Authorised by the Council to sign in that behalf

## VARIATION OF ORDER

This Order was varied by the London Borough of Southwark on the \_\_\_\_\_ day of \_\_\_\_\_ by a variation order under reference number \_\_\_\_\_ a copy of which is attached

Signed on behalf of the London Borough of Southwark

.....

Authorised by the Council to sign in that behalf

## REVOCATION OF ORDER

This Order was revoked by the London Borough of Southwark on the \_\_\_\_\_ day of \_\_\_\_\_

Signed on behalf of the London Borough of Southwark

.....

Authorised by the Council to sign in that behalf

**SCHEDULE**  
**Specification of trees**

**Tree specified as an Individual**  
**(within a black circle on the map)**

<i>Reference on map</i>	<i>Description</i>	<i>Situation</i>
T1	New Planting (Lime)	
T2	Lime	
T3	London Plane	
T4	London Plane	
T5	Lime	
T6	Pagoda Tree	
T7	Pagoda Tree	
T8	Pagoda Tree	
T9	Pagoda Tree	
T10	Pagoda Tree	
T11	Pagoda Tree	
T12	Pagoda Tree	
T13	Horse Chestnut	
T14	Horse Chestnut	
T15	Horse Chestnut	

**Trees specified as a Group**  
**(within a broken black line on the map)**

<i>Reference on map</i>	<i>Description</i>	<i>Situation</i>
None		

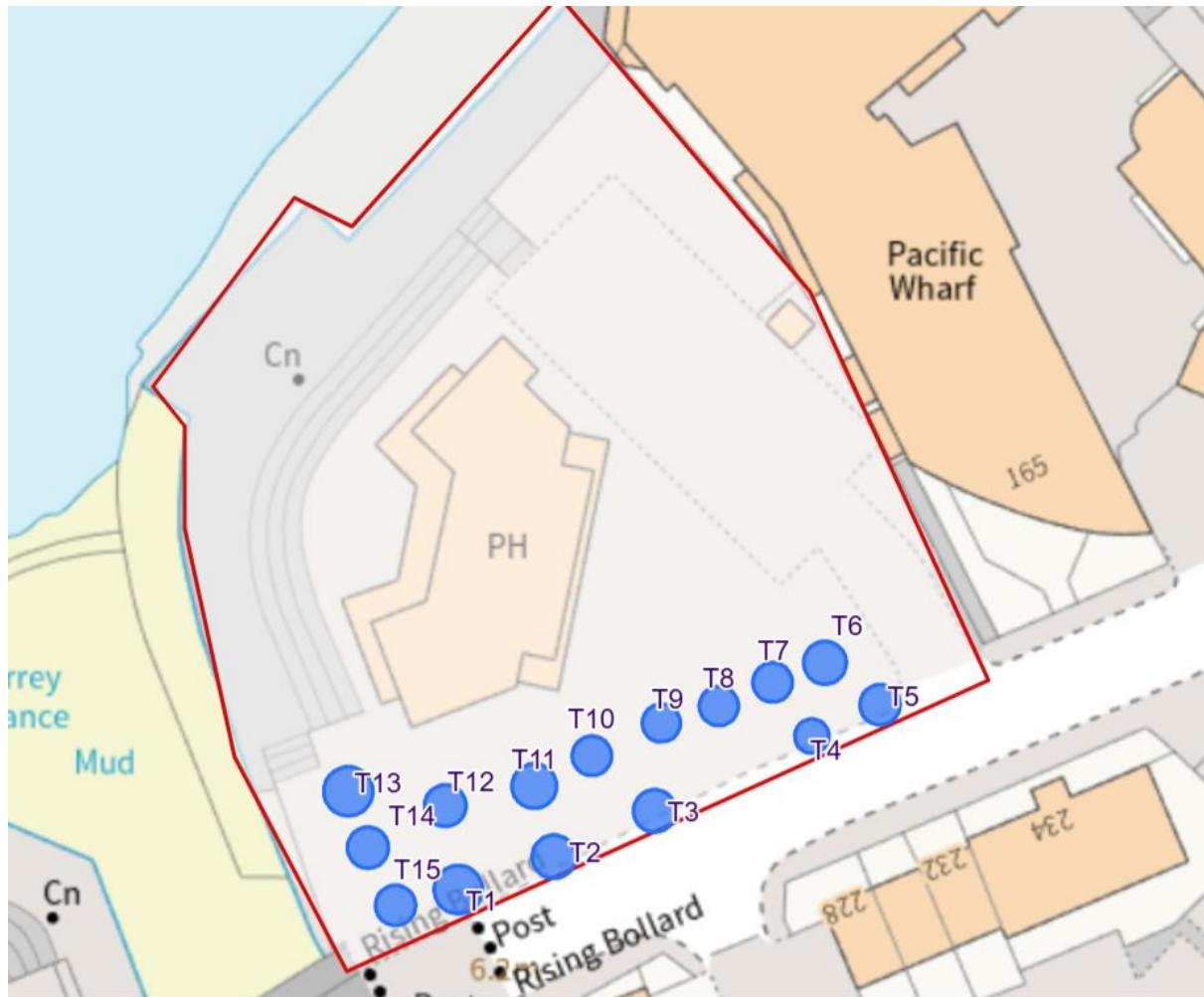
**Trees specified as an Area**  
**(within a dotted black line on the map)**

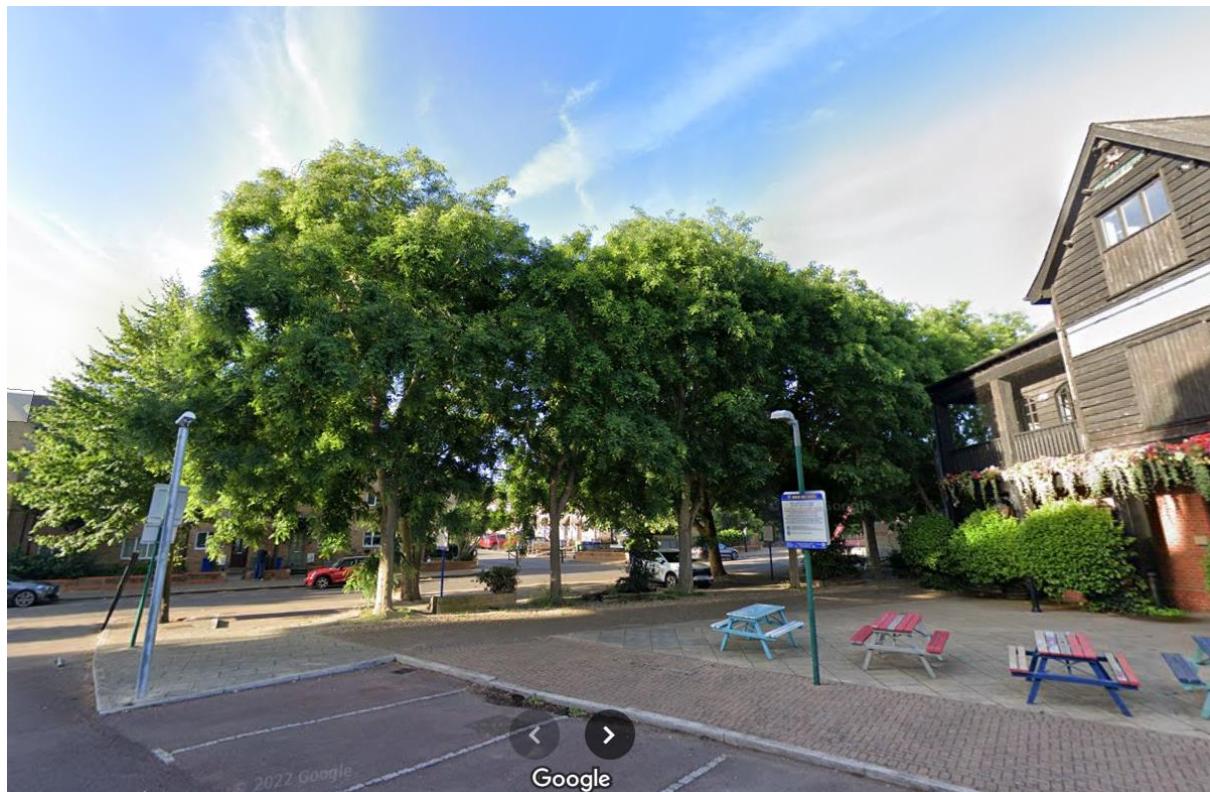
<i>Reference on map</i>	<i>Description</i>	<i>Situation</i>
None		

**Tree specified as a Woodland**  
**(within a continuous black line on the map)**

<i>Reference on map</i>	<i>Description</i>	<i>Situation</i>
None		

## PLAN



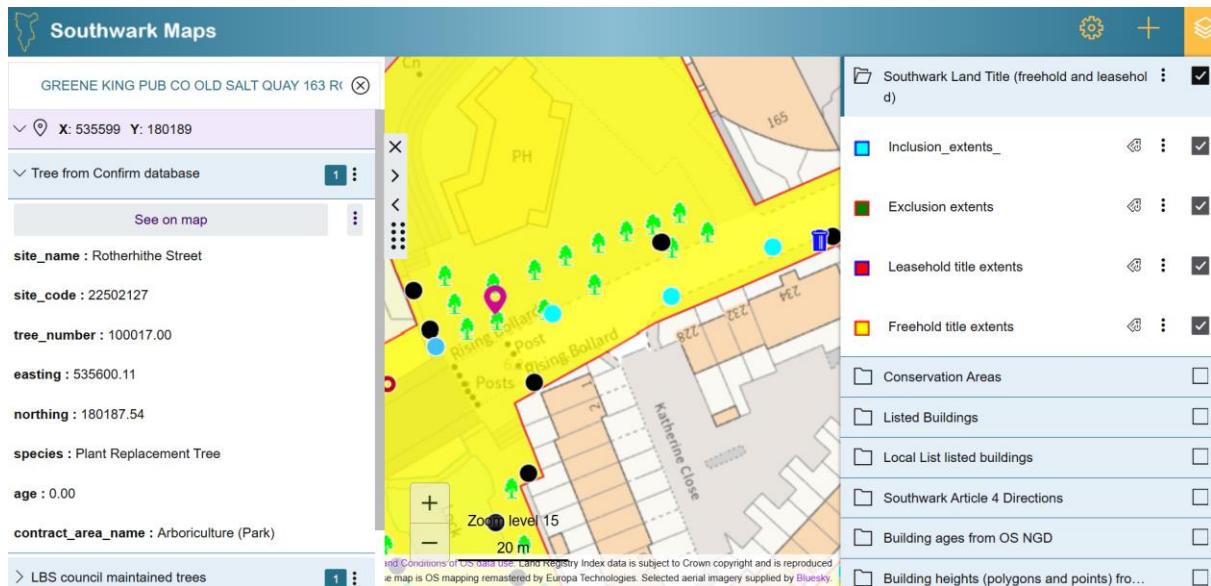




TREE EVALUATION METHOD FOR PRESERVATION ORDERS (TEMPO)					
Survey Data Sheet & Decision Guide					
Date:	14.08.2025	Surveyor:	LB		
<b>Tree details</b>					
	752	Tree/Group No:	T1-T15	Species:	Mixed deciduous including Plane, Pagoda, Lime & Chestnut
TPO Ref (if applicable):					
Location: Old Salt Quay 163 Rotherhithe Street London SE16 5QU					
REFER TO GUIDANCE NOTE FOR ALL DEFINITIONS					
<b>Part 1: Amenity London</b>					
<b>a) Condition &amp; : Southwark</b>		<b>Score: Highlight as Applicable</b>			
Good Highly suitable	5	100+ Highly suitable	5		
Fair Suitable	3	40-100 Very suitable	4		
Poor Unlikely to be suitable	1	20-40 Suitable	2		
Dead Unsuitable	0	10-20 Just suitable	1		
Dying/dangerous* Unsuitable	0	<10* Unsuitable	0		
* Relates to existing context and is intended to apply to severe irremediable defects only		*Includes trees which are an existing or near future nuisance			
<b>c) Relative public visibility &amp; suitability for TPO</b>					
Very large trees with some visibility / prominent large trees	5	Highly suitable			
Large trees, or medium trees clearly visible to the public	4	Suitable			
Medium trees, or large trees with limited view only	3	Suitable			
Young, small, or medium/large trees visible only with difficulty	2	Barely Suitable			
Trees not visible to the public, regardless of size	1	Probably Unsuitable			
<b>d) Other factors ( Trees must have accrued 7 or more points (with no zero score) to qualify)</b>					
Principal components of arboricultural features, or veteran trees	5				
Tree groups, or members of groups important for their cohesion	4				
Trees with identifiable historic, commemorative or habitat importance	3				
Trees of particularly good form, especially if rare or unusual	2				
Trees with none of the above additional redeeming features	1				
<b>Part 2: Expediency assessment (Trees must have accrued 10 or more points to qualify)</b>					
5) Immediate threat to tree	5	Notes:			
3) Foreseeable threat to tree	3				
2) Perceived threat to tree	2				
1) Precautionary only	1				
<b>Part 3: Decision guide</b>					
Any 0 Do not apply TPO	Overall Score:	17		Date:	
1-6 TPO indefensible	Recommend:	TPO	TPO Served:		
7-11 Does not merit TPO		Do Not TPO	Confirmed:		
12-15 TPO defensible					
16+ Definitely merits TPO	Date:	14.08.2025			

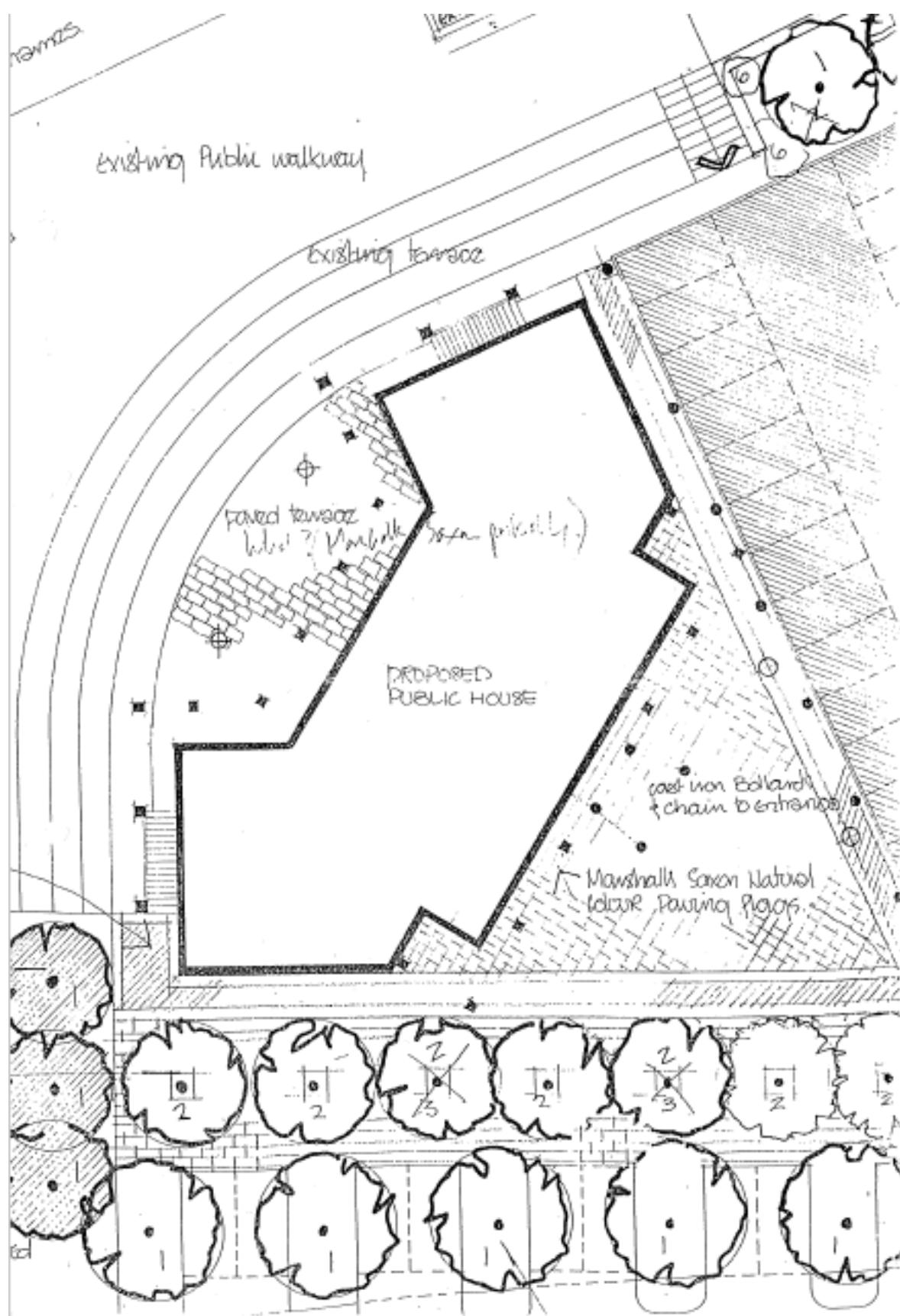
## APPENDIX B: MAPS and PLANS

### Showing Council maintained trees and Southwark Freehold Title



### Updated PLAN following site visit 14.08.2025



**Original Planting Scheme (as approved)**

## APPENDIX C: TEMPO 14.08.2025

TREE EVALUATION METHOD FOR PRESERVATION ORDERS (TEMPO)					
Survey Data Sheet & Decision Guide					
Date:	14.08.2025	Surveyor:	LB		
<b>Tree details</b>					
	752	Tree/Group No:	T1-T15	Species:	Mixed deciduous including Plane, Pagoda, Lime & Chestnut
TPO Ref (if applicable):					
Location: Old Salt Quay 163 Rotherhithe Street London SE16 5QU					
REFER TO GUIDANCE NOTE FOR ALL DEFINITIONS					
Part 1: Amenity London					
a) Condition & : Southwark		Score: Highlight as Applicable			
Good Highly suitable	5	100+ Highly suitable	5		
Fair Suitable	3	40-100 Very suitable	4		
Poor Unlikely to be suitable	1	20-40 Suitable	2		
Dead Unsuitable	0	10-20 Just suitable	1		
Dying/dangerous* Unsuitable	0	<10* Unsuitable	0		
* Relates to existing context and is intended to apply to severe irremediable defects only		*Includes trees which are an existing or near future nuisance			
b) Retention span (in years) & suitability for TPO					
Very large trees with some visibility / prominent large trees	5	Highly suitable			
Large trees, or medium trees clearly visible to the public	4	Suitable			
Medium trees, or large trees with limited view only	3	Suitable			
Young, small, or medium/large trees visible only with difficulty	2	Barely Suitable			
Trees not visible to the public, regardless of size	1	Probably Unsuitable			
c) Relative public visibility & suitability for TPO					
Principal components of arboricultural features, or veteran trees	5				
Tree groups, or members of groups important for their cohesion	4				
Trees with identifiable historic, commemorative or habitat importance	3				
Trees of particularly good form, especially if rare or unusual	2				
Trees with none of the above additional redeeming features	1				
d) Other factors ( Trees must have accrued 7 or more points (with no zero score) to qualify)					
5) Immediate threat to tree	5				
3) Foreseeable threat to tree	3				
2) Perceived threat to tree	2				
1) Precautionary only	1				
Part 2: Expediency assessment (Trees must have accrued 10 or more points to qualify)					
		Notes:			
5) Immediate threat to tree	5				
3) Foreseeable threat to tree	3				
2) Perceived threat to tree	2				
1) Precautionary only	1				
Part 3: Decision guide					
Any 0 Do not apply TPO	Overall Score:	17	Date:		
1-6 TPO indefensible			TPO Served:		
7-11 Does not merit TPO	Recommend:	TPO			
12-15 TPO defensible		Do Not TPO	Confirmed:		
16+ Definitely merits TPO	Date:	14.08.2025			

## APPENDIX D: Photos and Photomontages





**Prior to Removal**



<b>Meeting Name:</b>	Planning Committee (Smaller Applications)
<b>Date:</b>	15 October 2025
<b>Report title:</b>	Development Management
<b>Ward(s) or groups affected:</b>	All
<b>Classification:</b>	Open
<b>Reason for lateness (if applicable):</b>	Not applicable
<b>From:</b>	Proper Constitutional Officer

## RECOMMENDATIONS

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

## BACKGROUND INFORMATION

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

## KEY ISSUES FOR CONSIDERATION

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

- b. To give observations on applications in respect of which the council is not the planning authority in planning matters but which relate to site(s) within the borough, or where the site(s) is outside the borough but may affect the amenity of residents within the borough.
- c. To receive for information any reports on the previous determination of applications, current activities on site, or other information relating to specific planning applications requested by members.

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

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

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

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

### **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

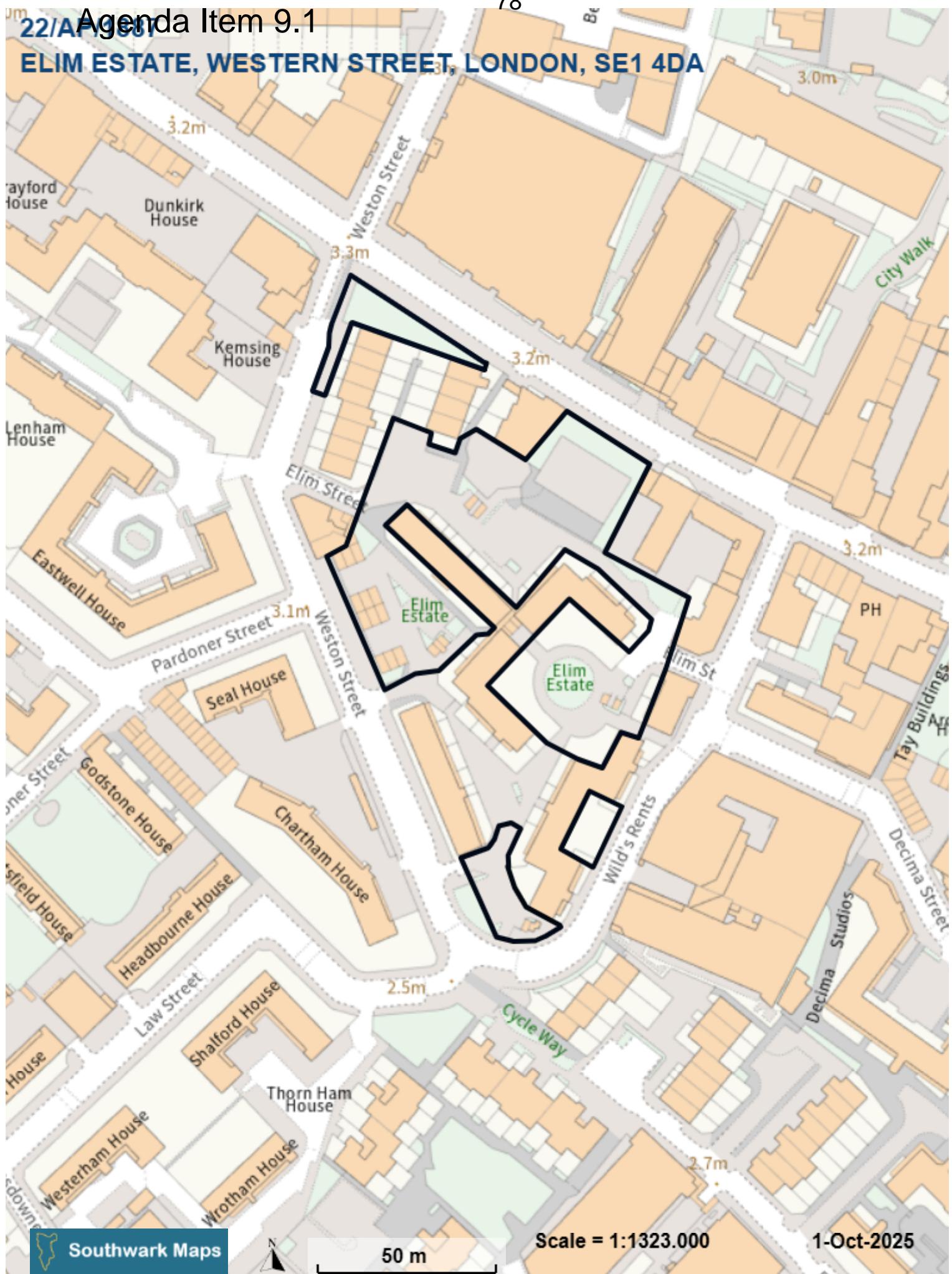
No.	Title
None	

**AUDIT TRAIL**

<b>Lead Officer</b>	Chidilim Agada, Head of Constitutional Services	
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Assistant Chief Executive – Governance and Assurance	Yes	Yes
Director of Planning and Growth	No	No
<b>Cabinet Member</b>	No	No
<b>Date final report sent to Constitutional Team</b>	3 October 2025	

## Agenda Item 9.1

## ELIM ESTATE, WESTERN STREET, LONDON, SE1 4DA



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<b>Meeting Name:</b>	Planning Committee (Smaller Applications)
<b>Date:</b>	15 October 2025
<b>Report title:</b>	<p><b>Development Management planning application:</b> Application 22/AP/1887 for: Full Planning Application</p> <p><b>Address:</b> Elim Estate, Elim Street, London Southwark</p> <p><b>Proposal:</b> The construction of 34 social rented homes across two separate buildings, along with the provision of external community / sports / play facilities and associated landscaping and car parking.</p>
<b>Ward(s) or groups affected:</b>	Chaucer
<b>Classification:</b>	Open
<b>Reason for lateness (if applicable):</b>	Not Applicable
<b>From:</b>	Director of Planning and Growth
<b>Application Start Date:</b> 17.06.2021	<b>Application Expiry Date:</b> 15 January 2026
<b>Earliest Decision Date:</b>	8 October 2022

## RECOMMENDATION

1. That planning permission be granted subject to conditions, the applicant entering into an appropriate legal agreement no later than 15 April 2026.
2. In the event of the requirements of paragraph 1 above are not met by 15 April 2026, the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 373.

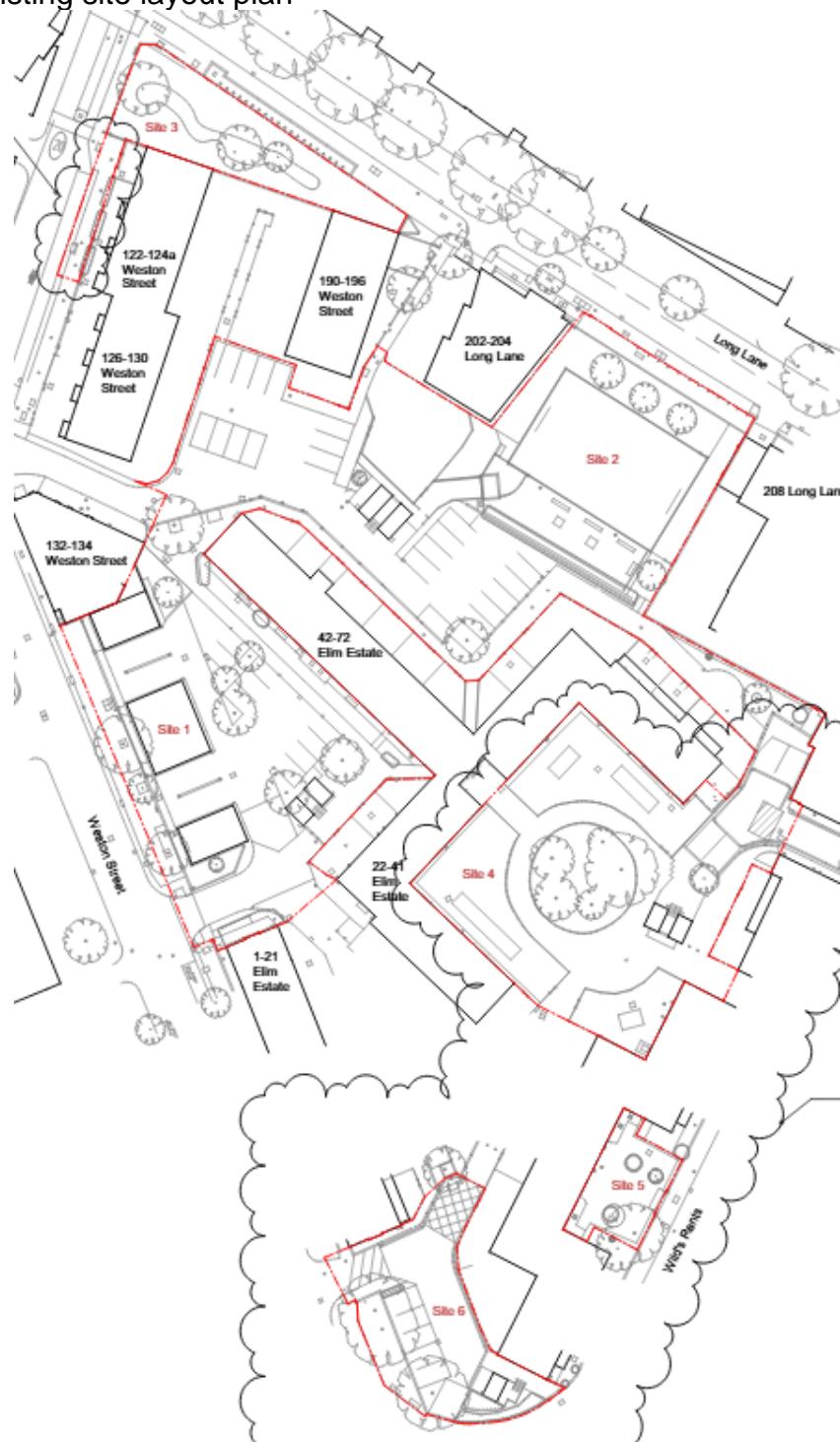
## BACKGROUND INFORMATION

### Site location and description

3. The application covers six sites within the Elim Estate. The Elim Estate is not listed and is not within a conservation area, although the boundary of the Bermondsey Street conservation Area stretches westwards to include the northeast section of Wild's Rents. The Elim Estate comprises 4 four storey blocks with a total of 121 flats, 35 off-street car parking spaces, refuse stores, communal gardens and a Multi-Use Games Area (MUGA) on site 2. The façade treatment on Elim Estate is pre-dominantly brown-orange / yellow stock brick and a mix of yellow stock brick, white brick, render and black brick. There are 31 trees on the

site of which 16 are category B trees and 15 are category C trees.

Image: Existing site layout plan



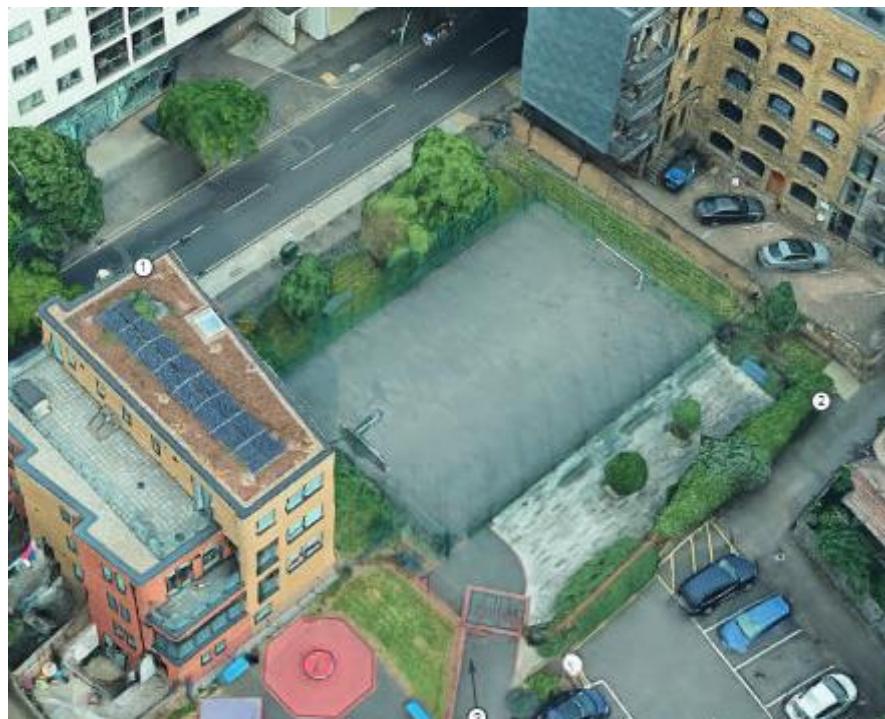
4. Site 1 fronts onto Weston Street and comprises three single storey garage buildings with space for 12 cars set in hard and soft landscaping. The submitted existing plan show three trees on the pavement along Weston Street, but a fourth tree has been planted by the council since the application has been submitted. There are six trees on the rear part of site 1. The council maintains all of these trees. The site is accessed via a vehicular crossover off Weston Street.

Image – Existing site photo site 1



5. Site 2 contains a MUGA of 344sqm and a landscaped area. A children's play area of approximately 200sqm is to the south west of site 2. The site fronts Long Lane to the north and backs onto an access road and parking area within the estate. There are six trees on the site. The site lies away from the Transport for London and Strategic Road Networks (TLRN and SRN) but there is a Santander cycles docking station directly adjacent to the site. There is a part six, part nine storey building to the north, on the opposite side of Long Lane. The eastern boundary of site 2 comprises a brick boundary wall and a six storey residential building, 208 Long Lane. A four storey residential block, 202-204 Long Lane, lies to the west of the site.

Image - Site 2 existing site photo



6. Site 3 is located on the corner of Weston Street and Long Lane and comprises grass, planting and trees. Weston Street forms part of the London Cycle Network (LCN route 22).

Sites 4, 5 and 6 are in the south-eastern part of the estate and comprise landscaped areas, trees, off-street car parking and refuse stores.

7. The area surrounding the application site is predominantly residential in nature with a small number of local shops and other commercial uses along Long Lane (to the north of the site). There are a number of parks and open spaces in the wider area, but the closest and most significant park, Tabard Gardens (approximately 1900sqm) is just over 200m to the south west.

8. The site is subject to the following planning designations:

- Central Activity Zone
- Archaeological Priority Zone
- Air Quality Management Area, and
- Flood Zone 3 benefiting from flood defences
- Controlled Parking Zone (CPZ); and
- Public Transport Accessibility Level (PTAL) varies from 6a to 6b across the estate.

## Previous planning permission

9. The council previously granted planning permission for the construction of 34 social rented homes across two separate buildings, along with the provision of

external community / sports / play facilities and associated landscaping and car parking, on 11 September 2023, on application ref. 22/AP/1887, made by Leathermarket Community Benefit Society.

10. On 14 June 2024 an undated letter before claim (“LBC”) was received from Public Interest Law Centre acting for a claimant challenging the council’s decision to grant planning permission ref. 22/AP/1887 proposing five grounds of challenge:
  - Ground 1 - Flood Risk
  - Ground 2 - Leathermarket Grant Agreement
  - Ground 3 – Equality Duties
  - Ground 4 – Daylight and Overshadowing; and
  - Ground 5 – Consultation.
11. On 19 June 2024, the Council entered into a s106 unilateral undertaking in respect of the development at the Elim Estate, ref no 22/AP/1887.
12. On 10 July 2024, the council under Ground 1 (Flood Risk), accepted that the decision to grant planning permission reference 22/AP/1887 was unlawful and should be quashed by reason of the failure in the officer’s report to consider and apply national flood risk policy as set out in paragraphs 165-173 of the National Planning Policy Framework.
13. On 19 February 2025 the local planning authority received the sealed consent order from the court quashing decision 22/AP/1887 and remitting the application to the Council for redetermination.
14. A letter from the council of 9 February 2024 (a Friday) confirmed the Application as valid, and that its start date was 17 June 2021.
15. The application, in its original form, sought planning permission for the following (taken from the original application form):
  - Application for full planning permission for the provision of 34 new social rented homes across two separate buildings, along with the provision of external community/play/sports facilities and associated landscaping and car parking.

### **Amendments**

16. The applicant submitted amendments on 8 August 2025. The amendments included documents in response to all 5 grounds of the judicial review and technical and planning policy updates.
17. The amended application was then the subject of a full consultation by the local planning authority, in addition to the consultation on the application as initially made. Planning officers reported in 2023 that 52 comments of support have been received, and 52 comments of objection have been received. Following the amendments, a further 3 residents and objectors have objected. A further 1 comment of support has been received.

18. A main point of new objection raised is that 'by conceding only Ground 1, the Council avoided judicial scrutiny of all five grounds. The other four additional grounds were never withdrawn, conceded, or judicially determined. These are:
  - Ground 2 - Leathermarket Grant Agreement;
  - Ground 3 – Equality Duties
  - Ground 4 – Daylight and Overshadowing
  - Ground 5 – Consultation

Judge Sir Peter Lane explicitly noted he did "not need to consider the other grounds of challenge." These remain live legal issues.'

19. It is against this background, that an assessment of the amended application on the five grounds of judicial challenge follows below:

## **Ground 1 - Flood Risk**

20. The NPPF 2024 states development must be flood resistant and resilient. The NPPF emphasizes a risk-based approach to planning and development in flood-prone areas and states development proposals must avoid increased vulnerability to climate impacts and incorporate adaptation measures like green infrastructure and sustainable drainage systems (SuDS). The Sequential Test and Exception Tests are the core tools used to assess whether development should proceed in flood-prone zones.

### *Site Context*

21. The development site is in Flood Zone 3, as identified by the Environment Agency flood map. Zone 1 is the lowest risk, which indicates a low probability of flooding. Zone 2 is medium risk, which indicates a medium probability of flooding/ Zone 3 is highest risk, which indicates a high probability of flooding.

### *Sequential Test*

22. A sequential test forms part of a flood risk assessment (either strategic or site-specific). It directs development towards the least vulnerable areas for flood risk by assessing the risk from all sources of flooding, now and in the future, taking account of the impacts of climate change. The flood risk assessment should apply the Sequential Test. If this has shown that there are no, reasonably available, lower-risk sites suitable for the proposed development, the Exception Test should be applied.
23. The NPPF states that where a development proposal is in accordance with an allocation made in the Southwark Plan's Strategic Flood Risk Assessment (which set out the Sequential and Exception Tests), it is not necessary to repeat the Exception Test. This applies provided:
  - The proposed development is consistent with the use for which it was allocated
  - There have been no significant changes to the known level of flood risk to the

site, now or in the future which would have affected the outcome of the test.

24. The application site has not been allocated in the Southwark Plan's Strategic Flood Risk Assessment. A site-specific flood risk assessment is therefore required. The applicant has therefore submitted a Sequential and Exception Test.

***Judicial Review pre-action protocol letter: Ground 1 Flood Risk***

25. The following paragraphs in the pre-protocol letter states:
26. *'Paragraph 19: The Officer's Report deals with Flood Risk at paragraphs 219-223, where it is acknowledged that this site is in Flood Zone 3, and as such a high probability of flooding.'*
27. *'Paragraph 20: The council has failed to apply the sequential test as to flood risk required in policy. Indeed, the Officer's Report does not mention the sequential test at all.'*
28. *'Paragraph 21: The application was accompanied by a Flood Risk Assessment. However, consideration to the sequential test here is wholly inadequate and does not apply the test in any real sense.'*
29. The applicant has submitted amended Flood risk and drainage supporting documentation for the application. The applicant states that an 'Updated Flood Risk Assessments (FRAs) have been submitted for both Site 1 and Site 2. The following updates are explicitly noted:
  - Sequential Test - The reports reference the accompanying Sequential Test report prepared by Aegaea (ref: 2346/June 2025), which was not included in previous versions.
  - Flood mapping - Environment Agency flood maps have been updated to reflect the latest available data. The updated maps confirm that the sites remain within Flood Zone 3a (defended).
  - Exception Test – the reports include the exception test.
30. The applicant also states that a 'Sequential Test has been undertaken in full compliance with national policy and planning guidance. All potentially suitable sites identified within the agreed search area have been reviewed using the agreed assessment criteria. This process identified only one site with theoretical potential as an alternative. The applicant has formally approached the owner of this site to establish whether it could be acquired at fair market value. The owner has not confirmed any willingness to sell or otherwise make the site available for development, and there is no evidence to suggest that such availability is likely within a reasonable timeframe.'
31. Given the absence of any demonstrably available and suitable alternative, this site has been discounted from further consideration. It is therefore concluded that there are no sequentially preferable sites capable of delivering the proposed development. The proposal satisfies the Sequential Test in accordance with national policy and planning guidance.'

32. Following re-consultation by the local planning authority objectors raised concerns that the applicants attempt to address Ground 1: Flood Risk is an unverifiable tick-box exercise. Objectors state – 'Despite the Council's acceptance that the original decision was "unlawful...by reason of the failure in the officer's report to consider and apply national flood risk policy", the CBS's sequential test remains a tick-box exercise that is not possible to verify. No detail or documentary evidence is provided about the alternative site allegedly offering less flood risk that "could not be progressed". This retroactive, unsubstantiated attempt, fails to meet NPPF requirements for rigorous sequential testing before application submission.'
33. Objectors also raised concerns that the development would 'increase danger of flooding' and that the development would set a 'Precedent of Unlawful Decision-Making - Failure to Apply Planning Law' and state 'most critically, draw attention to the fact that the council's previous decision to grant planning permission for this application on 11 September 2023 was quashed by the court on 20 February 2025 because the officer report failed to consider and apply national flood risk policy as required by the National Planning Policy Framework, specifically the sequential and exception tests. This is a profound failing in the application of planning law. It is imperative that the planning committee ensures that this revised application, and all its aspects, are now rigorously and comprehensively assessed against all relevant planning policies and guidance, including the National Planning Policy Framework (NPPF). Any remaining ambiguities or deficiencies in the application of policy, as highlighted above, must lead to refusal to prevent another unlawful decision.'
34. Planning officers consider that the applicant has reviewed and attempted to acquire all potentially suitable alternative sites identified within the agreed search area. The report sets out the agreed methodology (Section 3), the datasets reviewed (Section 4 – SHLAA 2017, Brownfield Register 2020, Southwark "Map" of decided and outstanding applications, and open market searches), the review of over 1,000 potential sites including engagement with Southwark Council (Section 5), and its conclusions (Section 6), confirming that no sequentially preferable and reasonably available sites exist at lower flood risk. The applicant sent a recorded-delivery letter to the developer/site owner at both the planning application and Companies House addresses, allowing 21 days to respond. Receipt was confirmed at both addresses, but no reply was received. As the site remains subject to an undecided planning application and legal agreement, and with no confirmation of availability from the owner, it cannot be considered a reasonably available option. The National Planning Policy Framework (NPPF) requires proportionate evidence rather than individual correspondence, and in this case the submitted Sequential Test Report (Ref: AEG5828 SE1Southwark\_02) provides a clear, structured, and verifiable assessment consistent with NPPF requirements.
35. The council's flood risk team advised in 2025 that 'they do not review sequential tests as its purpose is to determine the availability of lower-risk sites for a proposed development; this is a task that sits within the Planning team. The LLFAs' role is to advise on the acceptability of Flood Risk/ Drainage Assessments and to make a judgement on the overall flood risk to the site and whether it will increase the risk elsewhere, rather than to decide whether there is

a better alternative site.'

36. Planning officers conclude that the Sequential Test has been undertaken in full compliance with national policy and planning guidance. As a result, the applicant has demonstrated that there are no reasonably available, lower-risk sites suitable for the proposed development. The Exception Test should therefore be applied.

*Exception Test*

37. NPPF paragraph 177 states that the need for the Exception Test will depend on the vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification in Annex 3 of the NPPF.

Developments for buildings used for residential development type based on the Annex 3 are required to undertake the exception test as buildings used for dwelling houses are classified as 'More vulnerable'.

38. The NPPF states that, for the Exception Test to be passed and development allocated, the following two points must be met:

1. The development would provide wider sustainability benefits to the community that outweigh the flood risk;
2. The development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

39. The applicant has submitted evidence of how both elements of the Exception test have been met over the two sites:

Wider sustainability benefits to the community which the scheme would provide over the two sites are:

➤ Environmental and Climate Resilience:

- Green roofs, sustainable drainage systems (SuDS), and biodiversity enhancements contribute to:
- Biodiversity net gain
- Improved surface water management
- Reduced urban heat island effect
- Enhanced air quality
- Carbon reduction through energy-efficient dwellings

➤ Affordable Housing and Social Equity:

- 100% affordable housing provision directly addresses acute housing needs in Southwark.

The Equalities Impact Assessment (EQIA) confirms positive impacts for groups with protected characteristics, supporting the Public Sector Equality Duty. The EQIA also recognizes that there may be some detrimental impacts, even with mitigation, but these effects are judged to be proportionate and legally justified

when weighted against the wider community benefits.

**Urban Regeneration and Land Efficiency:**

- Redevelopment of a constrained brownfield site aligns with London Plan goals for compact, sustainable urban growth.
- Makes efficient use of under-utilised land, contributing to regeneration.

**Public Realm and Community Benefits:**

- Creation of landscaped communal spaces and inclusive play areas for residents and the wider community.
- Supports active lifestyles, social cohesion, and inclusive design.

**Sustainable Transport and Air Quality:**

- Car-free housing and secure cycle storage promote modal shift away from car use.
- Reduces emissions and supports cleaner air.

40. The NPPF states that development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:

- a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location.
- b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment.
- c) it incorporates sustainable drainage systems, unless there is evidence that this would be inappropriate.
- d) any residual risk can be safely managed.
- e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.

Image – sites 1 and 2



**Development vulnerability**

41. The entire site would be within flood risk zone 3. The NPPF and Planning Practice Guidance (PPG) classify development types by vulnerability. Basement

dwellings are in the “most vulnerable” category. The proposed duplex dwellings are classified under the “More Vulnerable” category of flood risk vulnerability. The proposed duplex flats on the ground floor and first floors of the new buildings on sites 1 and 2 would comprise living rooms, dining rooms, bathroom and kitchens. The duplex dwellings are appropriate for development in Flood Zone 3a provided the Exception Test is passed. They are not classified as “Most Vulnerable”, which would have prohibited development in this zone.

### Flood resistant and flood resilient

42. The terms flood resistant and flood resilient are two complementary strategies for managing flood risk in buildings:
43. Flood Resistant Measures (Dry-proofing) are designed to prevent water from entering a building during a flood event. Key features include:
  - Flood barriers at external doors
  - Air brick covers or sealed vents
  - Waterproof external walls and render
  - Raised thresholds and sealed foundations
  - Non-return valves on drainage pipes
44. Flood Resilient Measures (Wet-proofing) accept that water may enter the building but aim to minimize damage and allow for quick recovery. Key features include:
  - Water-resistant materials (e.g. tiled floors, lime plaster, plastic skirting)
  - Sockets and fuse boxes placed above flood level
  - Raised appliances (e.g. boilers, kitchen units on legs)
  - Removable internal doors or doors with lift-off hinges
  - Non-absorbent insulation and furnishings
  - Flood-compatible windows and patio doors
45. The FRA recommends both Flood Resistant Measures and Flood Resilient Measures.

#### Flood Resistant Measures:

46. • Flood barriers - Removable or permanent barriers at doors
- Air brick covers - Seal ventilation openings
- Waterproof render - External walls treated to resist water
- Raised thresholds - Door sills elevated above flood level
- Non-return valves - Prevent backflow in drainage pipes
- Sealed foundations - Prevent water ingress from below

#### Flood Resilient Measures:

47. • Raised electrics - Sockets, fuse boxes above flood level
- Water-resistant finishes - Lime plaster, waterproof screed
- Plastic skirting board - Avoid water absorption
- Tiled flooring - Waterproof adhesive used
- Raised appliances - Boilers, heaters on plinths
- Kitchen units on legs - Prevent water damage to cabinetry

- Removable internal doors - Lift-off hinges for easy removal
- Non-absorbent insulation - Reduces drying time post-flood
- Safe refuge areas - Upper floors above flood level.

48. Planning officers consider the development is appropriately flood resistant and resilient as shown in the FRA.

### Sustainable drainage

49. The proposed development would incorporate sustainable drainage systems.

50. The 2023 decision notice included the following 2 conditions, respectively relating to drainage strategy, and attenuation storage and existing runoff rate. This followed on from the addendum to the officer committee report which stated that 'an updated flood risk assessment has been submitted and has been reviewed by the flood risk team. As the flood risk team officers require clarification with regards to the proposed runoff rate calculations officers recommend that permission be subject to a pre-commencement condition...in relation to details of calculations for the proposed attenuation storage for site 2 and existing runoff rate calculations for sites 1 and 2.'

51. The applicant confirmed that the matters raised by the flood risk team in 2023 (see internal comments section of this report) were addressed and incorporated into the amended Flood Risk Assessment and Drainage Strategy documents submitted (2025).

52. Assessment and the measures which have been taken by the scheme design and layout to reduce the flood risk:

- It is not possible to lay the design of the site out to avoid areas of highest risk as the entire site would be within flood risk zone 3.
- No basements are proposed
- Bedrooms would be above ground floor level
- The design of the scheme would be resilient
- The Finished Floor Level would be set at 3.20 metres Above Ordnance Datum (AOD). The average site ground level is approximately 3.10m AOD and the modelled breach flood level reaches up to 3.28m AOD.
- Resilient construction materials have been used
- The layout of the site is designed to provide space for water to flow, away from buildings and escape routes.

Sustainable drainage would comprise the following types:

- Tanked storage crates
- Permeable paving
- Green roofs
- Attenuated discharge system (Hydrobrake)
- Catchpits / silt traps
- Water butts.

Feasible escape routes and emergency access routes from different parts of the site, on higher ground, and evacuation procedures have been factored in to cope

with a flooding event as evidenced in the site-specific flood risk assessment.

53. The residual flood risk can be safely managed through a combination of the following design, construction, and operational measures outlined in the Flood Risk Assessment:
  - Elevated Finished Floor Levels
  - Flood Resilient Construction
  - Sustainable Drainage Systems (SuDS)
  - Safe Site Layout
  - Flood Warning and Evacuation Plan.
54. As part of an agreed emergency plan the following safe access and escape routes are included:
  - Dry escape routes are planned
  - Internal refuge is available on upper floors; and
  - SuDS and drainage infrastructure help direct water away from buildings and access paths.
55. The Environment Agency and the Southwark flood risk team have been re-consulted in 2025, but the environment agency have not commented on the 2025 flood risk assessment. The council's flood risk team has reviewed the updated flood risk report, designs and calculations in 2025 and 'is happy with the updated calculations, which include the whole site area and provide sufficient storage to discharge the site at a rate of 2 l/s with no flooding shown up to and including a 1 in 100 + 40% CC scenario. The applicant has also utilised green infrastructure through green roofs in line with Southwark Planning Policy.' The council's flood risk team recommend the application be approved subject to two conditions relating to Sustainable Drainage Systems (SuDS) and a drainage verification report.

## **Ground 2 - Leathermarket Grant Agreement**

56. The claimant of the Judicial Review referred to financial deliverability, and state:
57. 'Under R(G) v Thanet DC [2021] EWHC 2026, where a council has an interest in development land, enhanced scrutiny must be applied to the planning application. Southwark Council failed to meet this enhanced duty, particularly regarding financial deliverability assessments. The Officer's Report remained silent on fundamental questions about funding arrangements despite the council's dual role as landowner and planning authority;
  - The materiality of this failure is demonstrated by the withdrawal of Greater London Authority funding for the development. This withdrawal provides concrete evidence that the financial concerns raised are well-founded and should have triggered rigorous assessment under the enhanced scrutiny requirements. The council's failure to properly evaluate financial deliverability has resulted in a fundamentally altered project that may no longer be viable without this significant funding source; and
  - The removal of GLA funding raises serious questions about whether the

current application can proceed as proposed and whether the Council has adequately assessed alternative funding arrangements or the project's revised financial viability. Under enhanced scrutiny requirements, such fundamental changes to the project's financial foundation should prompt comprehensive reassessment rather than proceeding with mere technical amendments to address flood risk concerns.'

58. The applicant has submitted Financial Viability Clarification supporting documentation for the application. The applicant states that 'this supporting note has been provided to clarify why a financial viability assessment is not required for the Elim Estate redevelopment planning application. The scheme proposes 100% affordable housing, significantly exceeding the 50% policy threshold and therefore fully complies with local and national planning requirements. The note explains that the availability of funding, or the applicant's financial position, is not a material planning consideration in this context. These are post-permission matters that do not affect the acceptability of the proposal in planning terms. It would be both inappropriate and beyond the lawful scope of the planning committee's discretion to base its decision on funding or delivery timing. The committee must determine the application on planning merits alone, in accordance with established policy and legislation.'
59. Following re-consultation by the local planning authority objectors raised concerns that the applicants attempt to address Ground 2: Financial Viability is potentially misuse of tenant funds. Objectors state – 'CIL funding was previously promised to the planning committee. However, there has been no further information provided on this. The applicant has produced numerous new documents from Maddox Planning with no identified funding source. With the well over £900,000 council funding exhausted, and the Mayor of London funding withdrawn, we suspect that consultant fees are being funded through improperly diverted tenant rent payments to CBS – this would be a breach of fiduciary duty. The planning committee cannot lawfully approve an application lacking transparent financial viability, particularly where the applicant may be misusing funds from council tenants.' Objectors also raised concerns that the 'council's officer's report failed to properly consider the material planning consideration of financial deliverability that remain unaddressed. Objectors state that generally Leathermarket CBS's submissions were inadequate and the council failed to require proper assessment before progressing the application. Objectors state 'despite concerns raised during the original planning committee meeting, the council's officer's report provided no adequate assessment of the scheme's financial viability or deliverability, despite the applicant's responsibility to demonstrate project feasibility.'
60. Planning officers agree with the Financial Viability Clarification documentation supplied by the applicant and consider that in this case financial deliverability is not a material planning matter.

### **Ground 3 – Equality Duties**

61. The allegation in the Pre-Action Protocol (PAP) Letter was that the equality impacts assessment and the council did not consider the potentially adverse effects on those with a disability (which is a protected characteristic under the Equality Act 2010).

62. The applicant has submitted an Equality Impact Assessment as part of the amended supporting documentation for the application. The applicant states that the 'Equality Impact Assessment (EQIA) has been updated to provide fuller assessment of how the proposed development may affect different members of the community, and how the design responds to those impacts. Key updates include:

63. Balanced assessment of impacts and the ball court

- Recognizes that, while the scheme is expected to deliver long-term benefits, a small number of residents may experience minor, long-term effects - for example, living nearer to the re-provided ball court or adapting to a denser layout. These impacts are considered to be limited and have been carefully mitigated through design measures, such as:
  - The relocated ball court is positioned for better natural surveillance, addressing concerns about anti-social behaviour of 'hidden' spaces. (EQIA, p. 11)
  - The redesigned ball court and play areas provide:
    - A polymeric safety surface suitable for wheelchair users, children, and adults. (EQIA, p. 11)
    - Noise-reducing fencing around the relocated ball court  
Planting buffers to soften environmental disturbance
    - Explains how the new ball court location improves visibility, safety and access - especially for children, women, and disabled users - while also managing potential concerns through noise-reducing fencing and what will be a resident-informed management plan.
  - The existing children's play area on the estate of 170sqm, which is in close proximity to site 2, would be replaced by a new children's play area on site 2 of 119sqm. A new play area of 814sqm is also proposed on site 4. Both the existing and new residents of the Elim Estate will benefit from these newly enhanced spaces and an increased play area of 765sqm.

64. Use of new ball court survey data

- A second updated usage survey (2024), carried out during the school summer holidays -when usage is expected to be at its highest - confirmed the findings of the original survey: the existing ball court is significantly underused. The majority of users were boys under 13, with very limited use by girls, adults, or disabled residents. These findings reinforce the rationale behind the original design - to create a more inclusive, accessible, and better-used space for a wider range of residents.
- Reinforced equality considerations

Strengthens the explanation of how the scheme supports equality under the Equality Act 2010. It highlights the wide-ranging benefits for residents with protected characteristics and sets out how design choices have been made to

support participation across the whole community. This includes accessible homes, safe public routes, step-free access, inclusive play areas, and communal green spaces.

#### Overall conclusion

- While the proposals are expected to bring significant long-term benefits to the estate, the updated EQIA recognizes that some residents may have concerns about certain changes - such as the new ball court location or increased housing density. These effects have been carefully considered as part of the overall design. On balance, the wider benefits of the scheme - including new council homes, enhanced outdoor spaces, and a safer, more inclusive environment - are assessed as outweighing the potential drawbacks. The updated EQIA aims to reflect a fair, balanced and sensitive approach that takes account of a range of resident experiences and supports the long-term wellbeing of the Elim community.'

65. Following re-consultation by the local planning authority objectors raised concerns that the applicants attempt to address Ground 3: Public Sector Equality Duty is an admission confirming a breach. Objectors state – 'This ground was never conceded, and the CBS's attempted remedy worsens their position. The new Equality Impact Assessment contains a fatal admission: equality considerations were not integrated into the design process. This confession of attempting post-hoc rationalization is precisely what courts reject in *R (Brown) v Secretary of State*, which requires equality duties be exercised "in substance, with rigour and with an open mind" before decisions are made. Most surprisingly, the new EqIA does not assess the needs of disabled residents living on Elim estate. Even though the Council had upheld a complaint that the process of considering the Elim application failed to protect the rights of people with disabilities. Furthermore, the new ball court survey acknowledges that the majority of users are from BAME backgrounds, yet the assessment still fails to address race as a protected characteristic. The CBS has thus provided documentary evidence of its own discriminatory practice while attempting to circumvent it.'

66. Objectors also reiterate some concerns raised in 2023 and state that:

67. The council failed to ensure meaningful engagement with disabled residents or disability advocacy groups during consultation

The Public Interest Law Centre's pre-action letter identified that the council:

- Failed to ensure adequate equality impact assessment was conducted regarding the effect of densification on disabled residents and other protected groups.
- The existing ballcourt serves as a vital recreational facility primarily used by children and young people from ethnic minority and economically disadvantaged backgrounds. Leathermarket CBS's proposal to reduce this facility disproportionately affects these protected groups under the Equality Act 2010. The council has failed to ensure proper assessment of how the loss of recreational space would impact children's physical activity, social

development, and community cohesion within these vulnerable communities;

- The gravity of these failures is compounded by the fact that Southwark Law Centre repeatedly raised the absence of adequate Equality Impact Assessment directly with the applicant, Leathermarket CBS, throughout the consultation process. These explicit warnings from a recognised legal advocacy organisation demonstrate that the equality assessment deficiencies were not inadvertent oversights but occurred despite clear notice of statutory requirements. The failure to address these professionally identified legal obligations after repeated warnings transforms this breach from potential procedural error into willful disregard of equality duties; and
- Crucially, equality impact assessments must be undertaken at the formative stage of consultation and cannot be conducted retrospectively after design decisions have been made. The council's failure to ensure proper equality impact assessment across all protected characteristics represents a fundamental procedural breach that cannot be cured by subsequent technical amendments.'

68. Objectors also refer to alleged breaches to London Plan Policy H1 (Increasing Housing Supply): While supporting housing delivery, Policy H1 requires that housing development should be plan-led and consider the impact on existing communities. The inadequate equality assessment processes demonstrate this has not been achieved.

69. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights.

70. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.

71. 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.

72. The protected characteristics in this case are age, disability, race, sex, pregnancy and maternity, religion or belief, sexual orientation, gender reassignment, marriage and civil partnership, and socio-economic status.

73. An amended equality impact assessment was submitted prior to the 2023 planning committee meeting application and included all above protected characteristics and concludes that the proposal would contribute to meeting housing needs in Southwark and would improve community facilities and would enable wider community use. An updated EQIA was also submitted in 2025, as set out above, which considered potential impacts on those with protected characteristics.

74. The proposal would provide family homes which would support families with children and young people currently living in overcrowded conditions. The re-provision of the ball court on site 2 would encourage increased usage by young males and women. The proposal includes provision of three wheelchair accessible homes, and a proportion of the 1 bed-flats would be provided to residents who currently require a home due to mental health issues. The new proposed ball court would enable easy access for residents with a physical disability and would offer numerous benefits to individuals with physical or mental impairments as it would promote inclusive recreation, physical fitness, mental well-being, social interaction, and community engagement.

The applicant proposes the following mitigation measures:

- The new proposed ball court, and children's play space (currently at site 2, to be replaced at site 4), would be provided before the current ball court and play space is closed. This would ensure there is no loss of these existing community facilities during the implementation of the proposed scheme.
- Reasonable contractor working hours to minimise disruption during construction; using hoses to damp down dust; and regular letter drops to residents to give them advance warning of when a particularly noisy part of the construction activity will take place. Planning officers recommended that permission be subject to a Construction Management Plan condition to ensure that occupiers of neighbouring premises and the wider environment do not suffer a loss of amenity by reason of pollution and nuisance.
- Minimise disturbance of ball court use by the installation of specialist sports fencing with minimal movement and noise-reducing fixings and a management plan for the ball court would be put in place.

75. Operational management Plan:

- A management plan for the new ballcourt, to be in place before use begins, setting out opening times and arrangements to manage activity levels. This would be secured by a condition.

76. • The council's children and youth play area services were previously consulted and The Head of Culture provided the following comments in 2023: 'My remit includes youth work related services and three adventure play sites. It doesn't extend to regular playgrounds and sports provision. Having said that, I did have a look at the proposals and noticed that the ball court / Multi-Use Games Area (MUGA) would be replaced by a new external MUGA / community / sports / play facility and that the existing children's play area would be replaced by a new children's play areas.

- I also noted that there is a very small loss of MUGA square footage but a considerable gain in terms of children's play area. Based on all of the above I don't have any formal comments to make.' The council's children and youth play area services were re-consulted in 2025 but have not provided comments.

77. The council has given due regard to the public sector equality duty where relevant or engaged throughout the course of determining this application. Any potential negative impacts on those with protected characteristics have been acknowledged, with suitable mitigation being suggested. Overall, the significant long-term benefits, including (add here, eg social housing, improved ball court and children's play space) are considered to outweigh the negative impacts identified in the Updated EQIA supplied in 2025.

78. **Additional consideration of new households (post-September 2023)**

Since the application was last considered by the planning committee in September 2023, seven households have moved onto the estate who were not present at that time. Officers note that these households include individuals with a range of protected characteristics under the Equality Act 2010. The updated Equality Impact Assessment (2025) already addresses the full range of protected characteristics, and its conclusions remain valid for these additional households. The committee can therefore be satisfied that due regard has been given to all persons with protected characteristics affected by the proposals. No further statutory consultation is required, and these households were notified and consulted as part of the council's August 2025 statutory re-consultation on the updated application documents.

**Ground 4 – Daylight and Overshadowing (Impact on daylight and sunlight of existing properties and spaces)**

79. The claimant referred to Paragraph 161 of the previous officer report: 'the daylight, sunlight and overshadowing report was not supplemented by an overshadowing design note'. The claimant states 'the proposed Defendant failed to have proper regard to overshadowing on amenity space. The proposed defendant has failed to provide any reason as to why this is not included. This is

a material planning consideration and the failure is unlawful.'

80. The claimant also drew 'attention to paragraph 154 of the officers report which discusses properties, of which the proposed Claimant is included:

The results of the VSC assessment for 32-41 Elim Estate show that the ground and first floor windows are below balconies and 23 windows would receive impacts that go beyond the standard BRE criteria. However, when the daylight levels were measured without the balconies in place, only 7 windows at ground and first floor would see marginal reductions and would retain values between 0.6 and 0.7. The claimant stated that 'the proposed Defendant has failed to consider the impact of daylight/ sunlight impacts to neighbouring properties to the proposals. The proposed Defendant should have given consideration to the nature of these occupants, particularly those with vulnerabilities as part of their equality duties.'

81. The applicant has submitted a Daylight / Sunlight Assessment as part of the 2025 amended supporting documentation for the application. The applicant states that 'as part of the updated Daylight and Sunlight Assessments for the Elim Estate redevelopment, both the Site 1 and Site 2 reports (dated 31 July 2025) have been revised to reflect technical design changes to the scheme, as well as updates to relevant guidance and planning policy. The following updates have been made:

- Report templates to include latest BRE guidance (2022) and planning policy (including Southwark Plan 2019-2036 and the latest NPPF dated December 2024)
- Revised modelling to reflect the latest Bell Phillips scheme (based upon DWG plans received on 13th May 2025) for both Site 1 & Site 2.
- Produced new plots drawings to show the existing, proposed and surrounding buildings.
- Updated technical analysis of daylight (using standard VSC & NSL tests) and sunlight (using standard APSH test) to surrounding residential properties of both Site 1 & Site 2.
- Technical analysis of daylight (using BRE 2022 standard DF and SDA tests) and sunlight (using BRE 2022 standard SE test) to the proposed units of both Site 1 & Site 2.
- Produced new plots drawings to show the layouts of units within the proposed blocks of both Site 1 & Site 2.
- Revised commentary of impacts to neighbouring residential properties of both Site 1 & Site 2, including separate commentary on units of Elim Estate which house vulnerable residents (with redacted addresses).
- Revised commentary of internal daylight/sunlight compliance within the proposed blocks of both Site 1 & Site 2.
- Sunlight amenity (overshadowing) test to show the amount of sunlight to the ball court and play space adjacent to Site 2.
- Additional 'Equality Considerations' section
- Revised appendices including the plot drawings and results noted above for each site/report.'

82. Following re-consultation by the local planning authority objectors raised concerns that the applicants attempt to address Ground 4: Daylight and

Overshadowing, confirm non-compliance. Objectors state – 'The updated Daylight/Sunlight Assessment compounds rather than resolves this ground. While the CBS has belatedly conducted the overshadowing tests that PILC identified as missing, they conspicuously fail to confirm that amenity spaces meet the BRE requirement that 50% receive two hours of sunlight on 21 March. This omission strongly suggests non-compliance. More seriously, while acknowledging 23 windows serving vulnerable residents will suffer impacts "beyond standard BRE criteria", the CBS has redacted the flats affected, preventing proper scrutiny of discriminatory impacts. The retroactive addition of an "Equality Considerations" section after design completion confirms these impacts on vulnerable residents were never properly considered, violating Section 149 of the Equality Act 2010. The CBS's own ball court survey acknowledges BAME communities as primary users of the affected amenity spaces, yet the assessment fails to address the discriminatory impact of overshadowing on these protected groups. The applicant has thus provided evidence of its own breach while attempting to obscure the full extent of harm to vulnerable residents. This reframing shows how their own new documents prove PILC's case rather than answering it.'

83. Objectors also raised concerns that the 'council's officer's report' (2023 planning committee) 'failed to properly consider the material planning consideration of Daylight and Sunlight Impact that remain unaddressed. Objectors state that generally Leathermarket CBS's submissions were inadequate and the council failed to require proper assessment before progressing the application. Objectors state 'the Building Research Establishment guidance recommends at least 50% of amenity space should receive two hours of sunlight on 21 March. Leathermarket CBS's daylight report was not supplemented by adequate overshadowing design analysis, and the council failed to require this essential information.

' Objectors also state that 'the application documents acknowledge that the redevelopment will result in "some loss of light" to neighbouring residential buildings, which currently benefit from a "relatively open and unobstructed outlook". The daylight and sunlight assessment indicates that several windows in neighbouring properties (e.g., 32-41 Elim Estate and 42-68 Elim Estate) would fall short of the standard Building Research Establishment (BRE) criteria or experience "marginal reductions, even if deemed acceptable "in context". Objectors state that this is contrary to London Plan Policy D6 (Housing quality and standards) and Southwark Plan Policy P14 (Design quality), which demand sufficient daylight and sunlight for new and surrounding housing.

84. It is noted that objectors also initially, following the initial consultation, raised concerns with regards to loss of daylight and sunlight.

85. Planning officers consider both site 1 and site 2 are currently underdeveloped resulting in the neighbouring residential buildings having the benefit of a relatively open and unobstructed outlook and receiving very good levels of natural daylight and sunlight. These existing levels are above Building Research Establishment (BRE) Guidelines targets and reasonable expectations for a built-up urban environment. Any meaningful redevelopment of the site would thus likely result in some loss of light and the BRE recommendations are assessed as in this context.

86. The adequacy of daylight received by existing neighbouring dwellings is measured using two methods of measurement. The first is the use of Vertical Sky Components (VSC) which is then followed by the measurement of internal Daylight Distribution. The authors of the daylight and sunlight assessment did not have access to the interior of any of the existing neighbouring buildings and have therefore relied upon a measured survey, architects' drawings, site photographs and Ordnance Survey information. This is general practice in producing this type of assessment.

### *Daylight*

87. Vertical Sky Component (VSC) is the amount of skylight reaching a window expressed as a percentage. The guidance recommends that the windows of neighbouring properties achieve a VSC of at least 27%, and notes that if the VSC is reduced to no less than 0.8 times its former value (i.e. 20% reduction) following the construction of a development, then the reduction will not be noticeable.

88. No-Sky Line (NSL) is the area of a room at desk height that can see the sky. The guidance suggests that the NSL should not be reduced to less than 0.8 times its former value (i.e. no more than a 20% reduction). This is also known as daylight distribution, and where windows do not pass the VSC test the NSL test can be used.

### *Sunlight*

89. Annual probable sunlight hours (APSH) is a measure of sunlight that a given window may expect over a year period. The BRE sunlight tests should be applied to all main living rooms and conservatories which have a window which faces within 90 degrees of due south. The guide states that kitchens and bedrooms are less important, although care should be taken not to block too much sunlight. However, the BRE guide explains that if the main window faces within 90 degrees of due north, but a secondary window faces within 90 degrees of due south, sunlight to the secondary window should be checked. The tests should also be applied to non-domestic buildings where there is a particular requirement for sunlight.

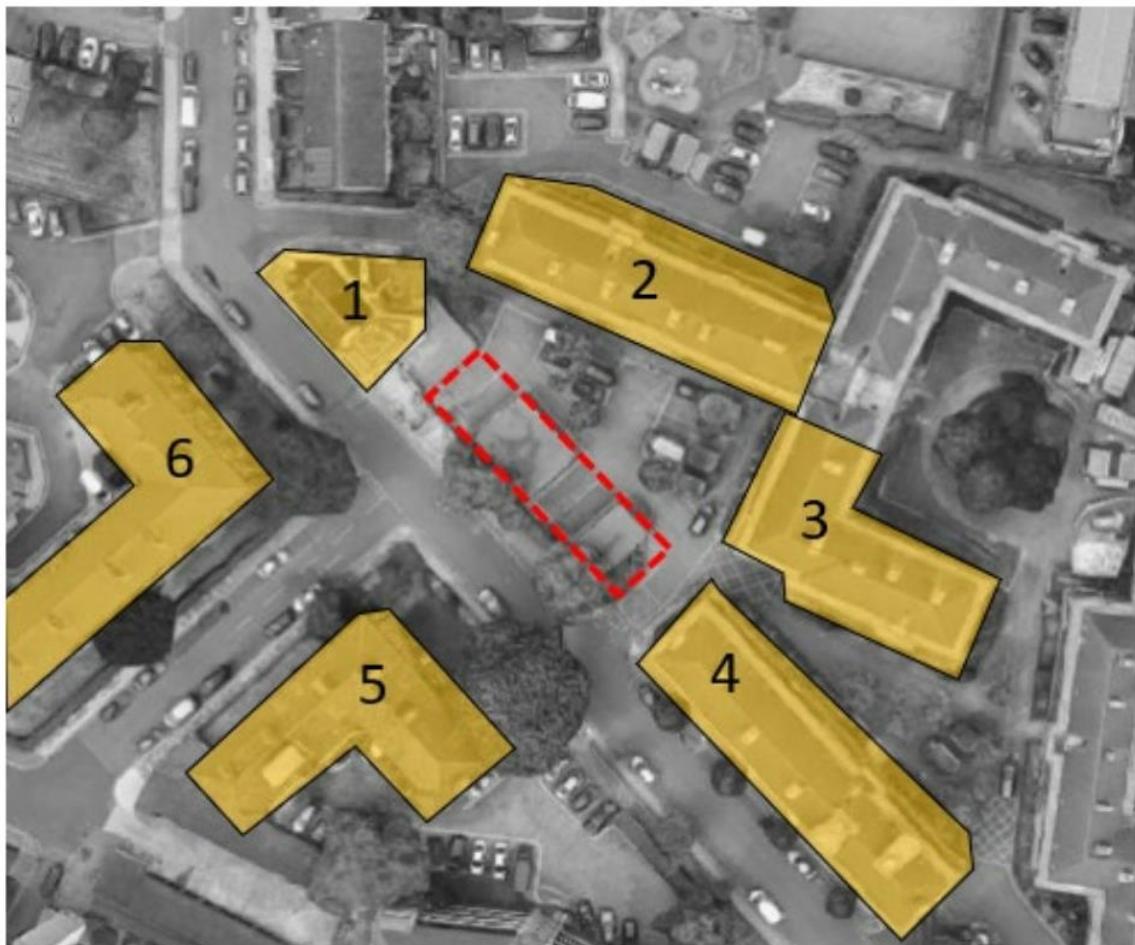
90. The BRE's recommendation for sunlight is:

'If this window reference point can receive more than a quarter (25%) of annual probable sunlight hours (APHS), including at least 5% of annual probable sunlight hours during the winter months of 21 September and 21 March, then the room should receive enough sunlight...any reduction in sunlight access below this level should be kept to a minimum. If the availability of sunlight hours are both less than the amounts given and less than 0.8 times their former value, either over the whole year or just during the winter months, then the occupants of the existing building will notice the loss of sunlight'.

## Site 1

Image – map showing site location and neighbouring residential properties

1. 132-134 Weston Street	2. 42-68 Elim Estate
3. 32-41 Elim Estate	4. 1-13 Elim Estate
5. Seal House	6. Eastwell House



### *Daylight and sunlight – vulnerable residents*

91. Planning officers note objectors raised concerns that the addresses of the affected units of Elim Estate which house vulnerable residents have been redacted.
92. The 2025 Daylight and Sunlight Report identified two flats on site 1 as housing vulnerable residents with disabilities. These units were assessed separately with commentary provided to ensure their specific needs were considered. One living room and one bedroom retained VSCs of 23.5% and 22.7%, respectively. These values are below the BRE target of 27%. Both rooms however retained NSL values above 56%, indicating good daylight distribution. Both rooms would retain high levels of annual and winter sunlight, well above BRE targets.

### *Daylight*

- 93. The results of the daylight and sunlight report show that 32-41 Elim Estate, 132 Weston Street, Seal House, Eastwell House and 1-13 Elim Estate would receive marginal impacts to daylight and sunlight and remain generally consistent with BRE guidance.
- 94. The results of the VSC assessment for 32-41 Elim Estate show that the ground and first floor windows are below balconies, and 5 windows would receive impacts that go beyond the standard BRE criteria.

Image – photo 32-41 Elim Estate



- 95. 8 windows of 54 windows tested at 42-68 Elim Estate are located beneath balconies on the ground and first floor. The results of the VSC assessment show that these windows would receive impacts that go beyond the standard BRE criteria. Another 22 windows would also receive impacts that go beyond the standard BRE criteria..

#### *Daylight distribution (NSL)*

- 96. The NSL test can be used where windows do not pass the VSC test.
- 97. No Sky Line (NSL) 134 Weston Street
- 98. The further NSL results at 42-68 Elim Estate have shown that 22 of 47 rooms assessed will meet or exceed BRE targets (i.e. 0.8 times the former value). 11 of

the 25 rooms falling below standard BRE targets will retain 0.70-0.79 times their former values. A further 9 rooms will retain NSL values in excess of 53%.

99. The further NSL assessment for Seal House has shown that 30 of 40 rooms assessed will exceed BRE targets (i.e. 0.8 times the former value). 3 of 10 rooms assessed will retain 0.71-0.78 times the former value. The remaining 7 rooms will retain NSL values in excess of 55%.

### *Sunlight*

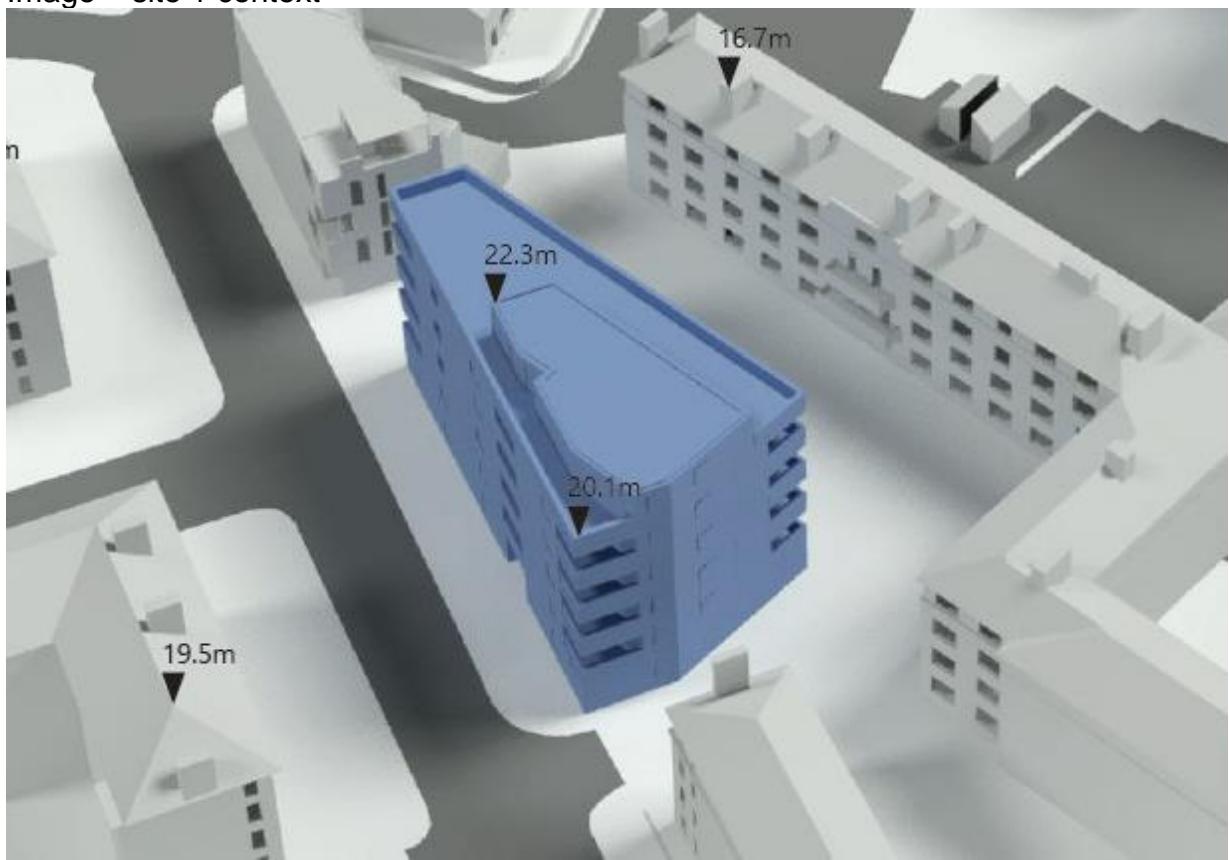
100. The sunlight assessment has shown that:

- 5 windows located in 42-68 Elim Estate would fall short of the BRE criteria. These rooms have windows beneath or adjacent to balconies
- No windows located in 32-41 Elim Estate which would overlook the proposed development are orientated within 90 degrees of due south
- All relevant rooms in 1-13 Elim Estate, Seal House, Weston Street, Eastwell House, Weston Street, 132 Weston Street and 134 Weston Street would retain good levels of sunlight consistent with the BRE criteria.

### Overshadowing

101. The BRE guidance recommends that at least 50% of the area of each amenity space should receive at least two hours of sunlight on 21 March.
102. The claimant referred to Paragraph 161 of the previous officer report: 'the daylight, sunlight and overshadowing report was not supplemented by an overshadowing design note'. Planning officers confirm that the 2023 decision did not assess overshadowing of amenity spaces at neighbouring properties at site 1 as it was considered that no neighbouring amenity spaces were in close proximity and would not be affected.

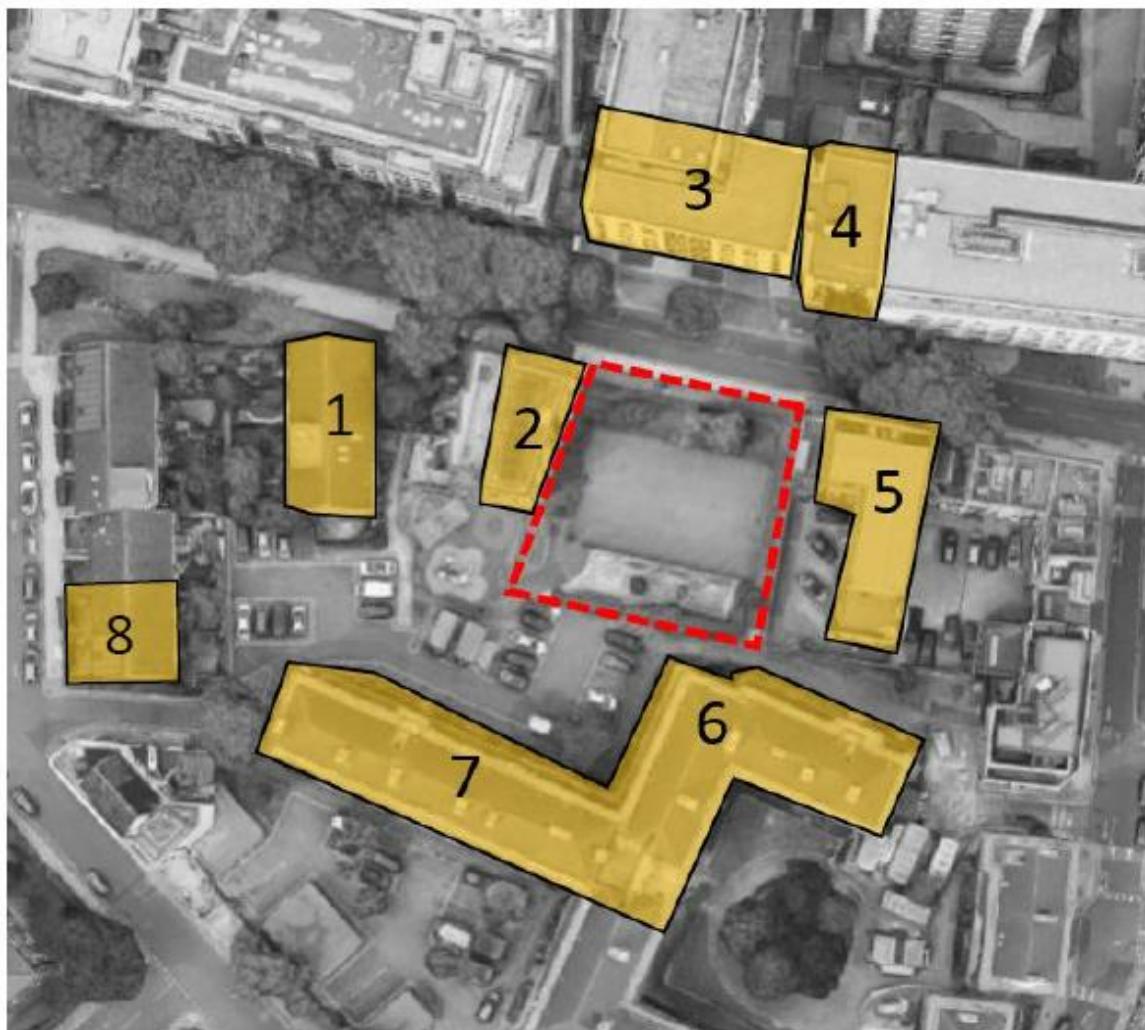
Image – site 1 context



## Site 2

Image – site 2: map showing site location and neighbouring residential properties

1. 190-196 Long Lane	2. 202-204 Long Lane
3. 193-197 Long Lane	4. Calico House, 199 Long Lane
5. 208 Long Lane	6. 73-82 Elim Estate
7. 42-72 Elim Estate	8. 128-130 Weston Street



*Daylight and sunlight – vulnerable residents*

103. Planning officers note objectors raised concerns that the addresses of the affected units of Elim Estate which house vulnerable residents have been redacted.
104. The 2025 Daylight and Sunlight Report identified four flats on site 2 as housing vulnerable residents with disabilities. Each of these units was individually assessed for daylight and sunlight impacts. The results showed full compliance with BRE guidelines for most windows and where minor reductions occurred,

they were:

- Close to the BRE thresholds (e.g., retaining 0.76–0.79 times the former daylight value);
- Often caused by existing obstructions like external walkways, not the proposed development itself; and
- Not expected to be noticeable to residents.

105. A separate EQIA was submitted with the planning application. It concluded:

- The scale of daylight reduction for residents with protected characteristics is limited;
- The retained daylight levels are within acceptable and policy-compliant parameters for a dense urban setting; and
- The impacts are not discriminatory and do not breach the Public Sector Equality Duty.

### *Daylight*

106. The results of the daylight and sunlight assessments show that all the windows assessed at 190-196 Long Lane would retain high levels of daylight in excess of the BRE criteria. The properties in the other 7 buildings would experience some reductions in daylight and sunlight that go beyond the standard BRE targets. daylight and sunlight that go beyond the standard BRE targets.

Image – photo: 202-204 Long Lane



107. The facing windows of 202-204 Long Lane are set in the flank elevation very close to the boundary with the development site, meaning that any material form of development would necessarily result in large impacts to daylight to 15 of the 24 windows tested. Most of the rooms in this elevation are served by other mitigating windows and would continue to receive good levels of daylight as a whole although there is one ground floor bedroom that is wholly reliant upon the development site. In these situations, the BRE guide suggests comparing the proposals against a 'mirror image' of the neighbouring building to demonstrate whether it is a good neighbour or 'takes more than its fair share of light'. The mirror assessment shows that the proposals will have significantly less impact on this property than it would have upon itself, so the impact is considered consistent with BRE guidance.

Image – photo: 193-197 Long Lane



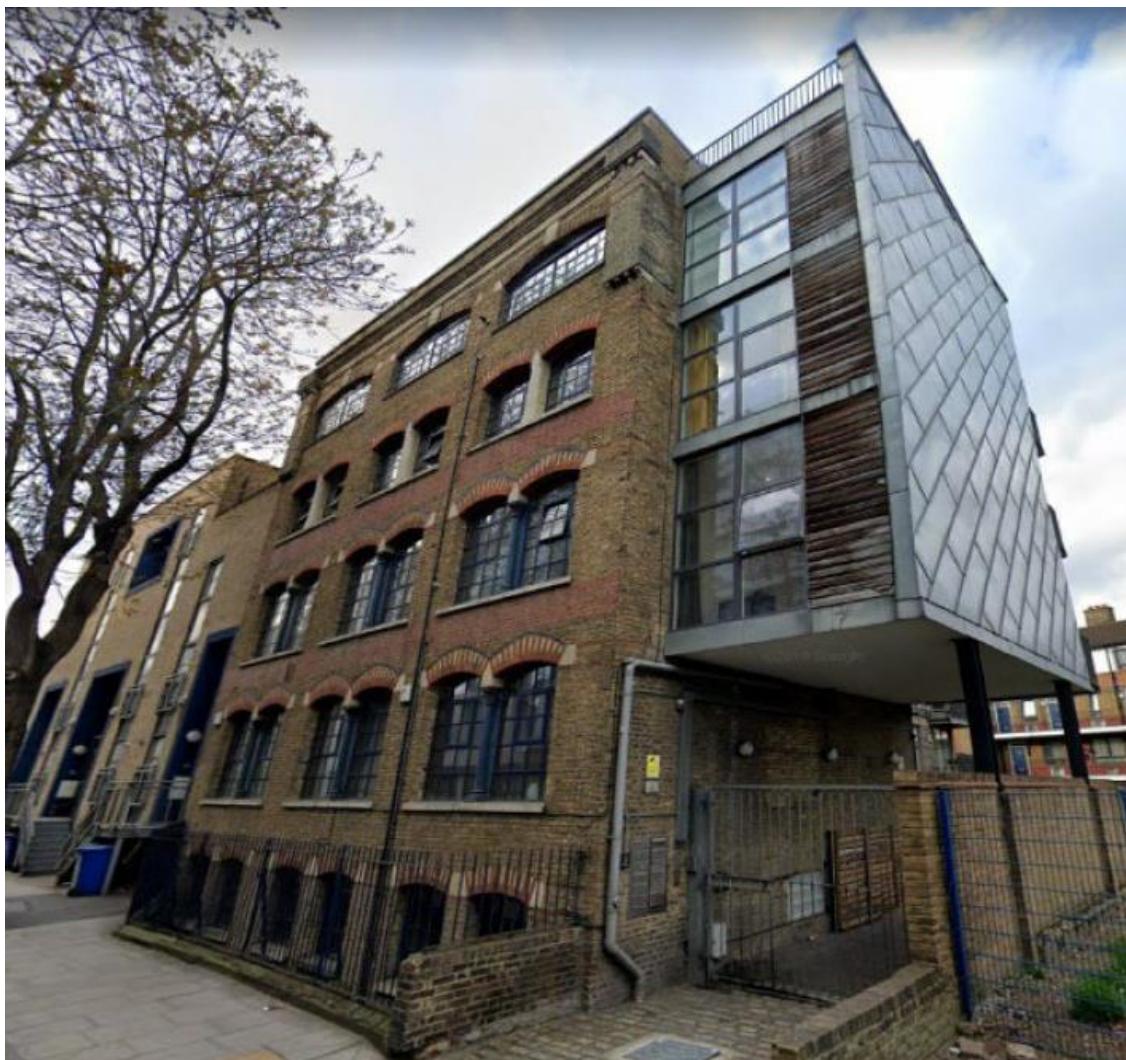
108. The results of the VSC assessment for 193-197 Long Lane have shown that 37 of 45 windows assessed will retain levels of VSC in excess of BRE targets (i.e. above 27% VSC or 0.8 times the former value). 7 of the 8 windows that fall below standard BRE targets will retain between 0.70 and 0.79 times the former values. One first floor LKD (W3) will retain a VSC of 15.3% (0.67 times the former value).

Image – photo: 199 Long Lane



109. The ground floor is in commercial use and therefore not relevant for daylight/sunlight analysis. The results of the VSC assessment have shown that 7 of 10 windows assessed will retain levels of VSC in excess of BRE targets (i.e. above 27% VSC or 0.8 times the former value). The 3 remaining windows retain 0.71-0.78 times the former values.

Image – 208 Long Lane



110. The results of the VSC assessment for this property have shown that 16 of 37 windows assessed retain levels of VSC in excess of BRE targets (i.e. above 27% VSC or 0.8 times the former value). 9 of the 21 windows that fall below standard BRE targets retain 0.70-0.79 times the former values, clearly close to the 0.8 target. A further 7 windows retain VSCs between 15.1% and 22.7% and one remaining window retains 14.8% VSC. The remaining 4 windows (3 of which are below ground level) retains VSCs of 11.2%-13.6%.

Image – photo: 42-82 Elim Estate



111. The results of the VSC assessment for this property have shown that 63 of 74 windows assessed retain levels of VSC in excess of BRE targets (i.e. above 27% VSC or 0.8 times the former value). 9 of the 11 windows that fall below standard BRE targets retain 0.72-0.77 times the former values. The remaining 2 windows are located beneath external walkways which obstruct the daylight to these rooms and therefore have very low existing VSC values. This leads to a larger proportionate change where the actual VSC change is minimal (c.2.2% VSC) and therefore would not be noticeable to a resident.

#### *Daylight distribution (NSL)*

112. The NSL test can be used where windows do not pass the VSC test.

##### No Sky Line (NSL) 202-204 Long Lane

113. The further NSL assessment has shown that 6 of 8 rooms assessed will retain good levels of daylight distribution with the proposal in place and will exceed BRE targets (i.e. 0.8 times the former value). All rooms with windows that fall below VSC targets (and are served by other mitigating windows) will exceed NSL targets. Of the 2 rooms that fall below standard BRE targets, one will retain 0.72 times the former value, clearly very close to the 0.8 target.

##### No Sky Line (NSL) 193-197 Long Lane

114. The further NSL results have shown that 33 of 40 rooms assessed will meet or exceed BRE targets (i.e. 0.8 times the former value). 3 of the 7 rooms falling below standard BRE targets will retain 0.76-0.79 times their former values. A further 4 rooms will retain NSL values in excess of 51%.

##### No Sky Line (NSL) Calico House 199 Long Lane

115. The further NSL results have shown that 8 of 10 rooms assessed will meet or exceed BRE targets (i.e. 0.8 times the former value). One of two rooms falling below standard BRE targets will retain 0.73 times the former value.

##### No Sky Line (NSL) 208 Long Lane

116. The further NSL assessment has shown that 13 of 26 rooms will meet or exceed BRE targets. 7 of the 13 rooms that fall below standard BRE targets will retain 0.70-0.79 times the former values which should be considered acceptable. A further 5 rooms will retain NSL values above 64%.

*Sunlight*

202-204 Long Lane:

117. The results of the APSH assessment have shown one of two relevant main living rooms will retain high levels of both annual and winter sunlight with the proposal in place, in excess of BRE targets (i.e. 25% APSH / 5% WPSH or 0.8 times the former value). A second will exceed BRE targets for winter sunlight (retaining 8%) but will fall slightly below the annual target (22%).

118. The sunlight assessment has shown that:

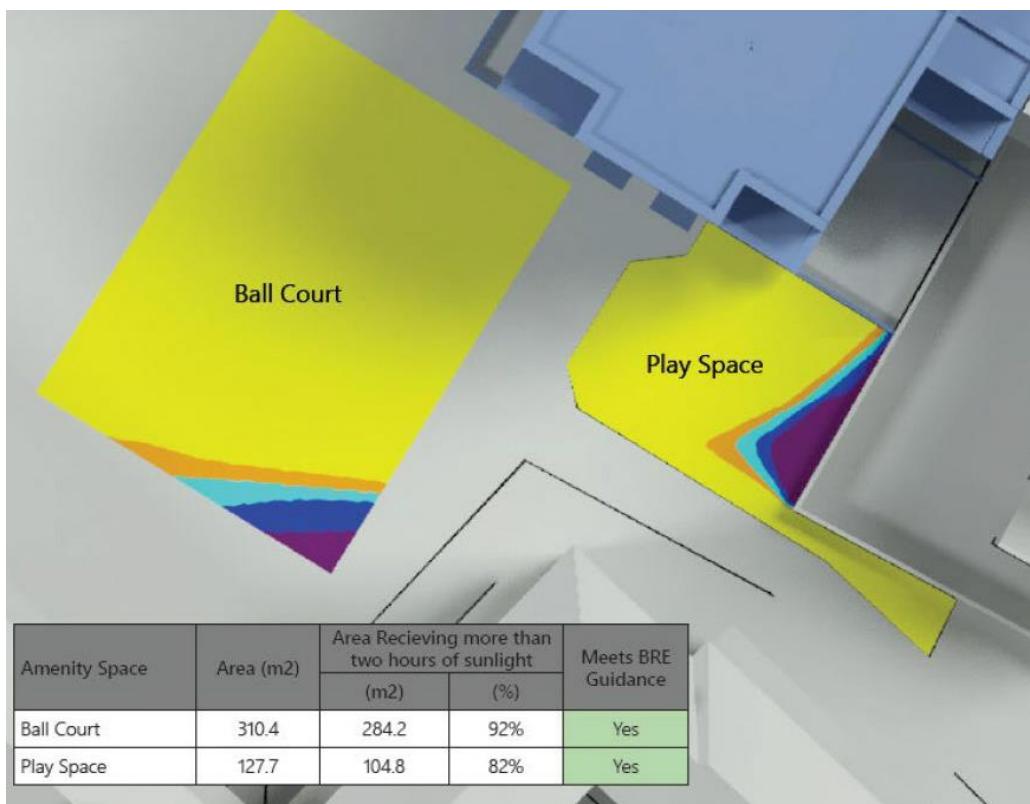
- No windows located in Elim Estate which would overlook the proposed development are orientated within 90 degrees of due south
- All relevant rooms in 190-196 Long Lane, 193-197 Long Lane, Calico House, 199 Long Lane, 208 Long Lane would retain good levels of sunlight consistent with the BRE criteria.

Overshadowing

119. The BRE guidance recommends that at least 50% of the area of each amenity space should receive at least two hours of sunlight on 21 March.

120. The claimant referred to Paragraph 161 of the previous officer report: 'the daylight, sunlight and overshadowing report was not supplemented by an overshadowing design note'. The 2023 overshadowing report for site 2 however shows that the proposed ball court and play space on site 2 would respectively receive 92% and 82% of two hours of sunlight on 21 March. This would be acceptable as the BRE guidance recommends that at least 50% of the area of each amenity space should receive at least two hours of sunlight on 21 March.

Image – ball court and play space: overshadowing



121. The overshadowing drawing as currently provided was the same drawing uploaded on the portal on 2 June 2023. The drawing also therefore has exactly the same results shown on the actual drawing. Planning officers therefore advise that overshadowing would be acceptable as was the case in 2023.

#### Conclusion on daylight and sunlight

122. Objectors raised concerns that the daylight and sunlight reports redacted details and the location of affected flats occupied by disabled residents living on Elim estate, preventing proper scrutiny of discriminatory impacts.

123. The 2025 Daylight and Sunlight Report identified two flats on site 1 as housing vulnerable residents with disabilities. These units were assessed separately with commentary provided to ensure their specific needs were considered. One living room and one bedroom retained VSCs of 23.5% and 22.7%, respectively. These values are below the BRE target of 27%. Both rooms however retained NSL values above 56%, indicating good daylight distribution. Both rooms would retain high levels of annual and winter sunlight, well above BRE targets.

124. The 2025 Daylight and Sunlight Report identified four flats on site 2 as housing vulnerable residents with disabilities. Each of these units was individually assessed for daylight and sunlight impacts. The results showed full compliance with BRE guidelines for most windows and where minor reductions occurred, they were:

- Close to the BRE thresholds (e.g., retaining 0.76–0.79 times the former daylight value);
- Often caused by existing obstructions like external walkways, not the

proposed development itself; and

- Not expected to be noticeable to residents.

125. A separate EQIA was submitted with the planning application. It concluded:

- The scale of daylight reduction for residents with protected characteristics is limited
- The retained daylight levels are within acceptable and policy-compliant parameters for a dense urban setting; and
- The impacts are not discriminatory and do not breach the Public Sector Equality Duty.

126. Whilst there would be some adverse effects, overall, planning officers consider the proposed development would not result in a significant impact on the surrounding residential properties, including flats occupied by disabled residents.

## Ground 5 – Consultation

### Gunning Principles

127. The claimant of the Judicial Review stated that 'there has been an agreement with the proposed Defendant to develop this site since 2019. This is inconsistent with consultation being undertaken where proposals are at a formative stage. Indeed, the proposed Defendant on the 9 June 2020 approved up to £985,028 to be drawn from the project grant agreement for the planning application. It would appear as though the proposed Defendant had approved of this plan in principle thus making any consultation essentially meaningless. The proposed Claimant does not agree that any adequate consultation was undertaken to all those with protected characteristics, in particular in respect to consulting with those with disabilities on the estate. There is no active TRA and the Decima Street TRA hall was out of use during the consultation period on the Estate and so residents have no proper independent body or space to discuss plans away from the applicant. The applicant has placed significant weight on residents supporting the need for housing. However, this is not the same as support for housing on site. For the above reasons, the did not follow the Gunning principles and as such was unlawful.'

128. The applicant has submitted an Early Engagement Strategy and Engagement Summary as part of the amended supporting documentation for the application. The applicant states that 'the Early Engagement Strategy and Engagement Summary have both been updated to include new sections setting out how the consultation for the Elim Estate redevelopment was structured to meet, and demonstrably fulfilled, the Gunning Principles, which establish the legal standard for fair and transparent public consultation in the UK.'

129. The documents show that all four principles were actively met throughout the engagement process:

1. Consultation at a formative stage:
  - Engagement began in 2018, well before any decisions were finalised.

Residents and stakeholders

- helped shape the emerging proposals through a series of early activities including door-knocking, estate walkabouts, drop-in sessions, and regular meetings with local groups.

2. Sufficient information provided:

- Stakeholders were given access to clear and accessible information throughout the process. This included A1 display boards, leaflets, site plans, presentation materials, and regular "You Said, We Did" updates to support informed responses.

3. Adequate time for consideration and response:

- The consultation was delivered over a sustained period (2018–2021), with multiple opportunities to engage at key milestones. A mix of in-person, online, and written formats was used to maximize accessibility and allow time for meaningful participation.

4. Feedback conscientiously taken into account:

Community feedback led to significant changes in the final proposals, including:

- Reduced building height and density
- Re-provision and relocation of the outdoor ball court
- Creation of a new community garden on the Triangle site', in place of a proposed affordable housing scheme
- 'Expanded tree planting and biodiversity measures
- Enhanced lighting, bin store design, parking, and access arrangements.'

130. Following re-consultation by the local planning authority objectors raised concerns that the applicants attempt to address Ground 5, 'the CBS's documentation confirms systematic violation of *R v Brent ex parte Gunning (1985)*:

Zero fresh engagement with Elim Estate and neighbouring residents despite submitting a significant number of resubmitted documents from consultants

- No signage has been placed on the estate about the current consultation
- Leathermarket JMB's refusal to recognize the legitimate TRA representing Elim and its neighbouring estates
- Admission that consultations since 2020 have produced no material changes in site location, height, or massing, proving predetermination
- The ball court ballot is an example of false choice architecture, where there was no option to keep the ballcourt as is in its current location.

131. This is all particularly damaging given the Regulator of Social Housing's finding that the council failed consumer standards with resident engagement at their core. The CBS's attempts to present their superficial engagement as adequate consultation only highlights the extent of their non-compliance.'

132. Objectors also raised concerns with regard 'Inadequate Community Engagement' and state 'despite the applicant's extensive consultation efforts, objectors have consistently raised concerns that not all neighbouring properties were consulted adequately, and that there is no functioning Tenants and Resident Association

(TRA) or designated Resident Project Group, limiting proper dissemination of information and discussion. This suggests that genuine resident concerns, particularly from vulnerable residents, may not have been fully addressed or integrated into the proposal, despite the council's public sector equality duty.'

133. Objectors reiterated some previous concerns are raised the following 'Breach of Consultation Requirements' concerns:
134. 'The consultation process failed to meet the established legal requirements under the Gunning principles as confirmed in *R v London Borough of Brent ex parte Gunning*. The consultation was fundamentally flawed because the Council had already committed to the development through grant agreements dating back to 2019, with £985,028 approved for the planning application stage by June 2020;
135. The absence of an active Tenants and Residents Association (TRA) for significant periods of the consultation, combined with the lack of any designated Resident Project Group throughout the process, meant residents had no proper independent forum to discuss proposals affecting their homes and community; and
136. Where residents raised legitimate concerns about inadequate consultation processes and voiced objections to the proposals, these were summarily dismissed without proper consideration, demonstrating the council's failure to ensure constructive engagement with community concerns and creating a procedural environment that discouraged meaningful participation.'
137. Objectors also raised the following concerns to alleged breaches to London Plan Policy H1 (Increasing Housing Supply): While supporting housing delivery, Policy H1 requires that housing development should be plan-led and consider the impact on existing communities. The inadequate consultation demonstrate this has not been achieved.
138. Following the original consultation by the local planning authority objectors raised the concerns in relation to consultation:
  - Not all neighbouring properties were consulted and only a few site notices were displayed
  - The applicant did not consult with the residents of the Elim Estate in line with the council's statement of community involvement and development consultation charter
  - The applicant did not submit an early engagement statement
  - There is currently no tenants and resident association (TRA) functioning on the Elim Estate, and the Decima Street TRA hall is out of use at present. This raises an important question of whether there is an appropriate forum on the estate for dissemination of information and discussion of the proposals
  - There has been no designated Resident Project Group for this project - there has been one for most of Southwark council's own new homes building projects
  - The Equalities Impact Assessment fails to provide a detailed assessment of how the change to the ball court will affect the young people who use it
  - The Equalities Impact Assessment fails to consider how the environmental effects of the development, in particular the loss of air quality caused by the

loss or trees and additional road, will impact children, the elderly and those with disabilities

- The Equalities Impact Assessment fails to consider the effects that the
  - relocated ball court would have on elderly and disabled residents in terms of increased noise, density and overshadowing – there particular concerns around the potential impacts on those with mental health issues
  - The council did not fulfil its' public sector equality duty as they did not engage with specific individuals with protected characteristics from the Elim Estate, did not consider alternative approaches and did not consider the broader impacts of delivering affordable housing through 'infilling' the Elim Estate.

### **Assessment - Gunning principle 1: Consultation at a formative stage**

139. In accordance with the Statement of Community Involvement and Development consultation charter adopted on 6 December 2022, an engagement summary has been submitted with the application. This provides a summary of the engagement that has been undertaken by the applicant within local residents and resident associations:

- 2018: Consultation meetings with the Decima Street TRA
- November-December 2018: The applicant carried out door knocking on Elim Estate
- 13 December 2018: The applicant held a drop-in event
- 2019: Consultation meetings with the Decima Street TRA
- January 2019: Consultation with Decima Street TRA and Leathermarket JMB board
- February 2019: Design brief consultation leaflets were mailed to Elim Estate residents and follow-ups were held with residents via door-knocking, email or texts
- March 2019: Follow-ups were held with residents via door-knocking and phone calls
- June 2019: Update and discussions/consultation was held at Decima Street TRA meeting

Given the above consultation planning officers consider that consultation have taken place when proposals were at a formative stage, thereby meeting Gunning principle 1.

Additional consultation:

- Planning Officers note, in addition to the above consultation, that the applicant undertook the following consultation, post June 2019:
- August 2019: Two estate walkabouts with residents
- September 2019: The applicant carried outdoor knocking on Elim Estate and consultation leaflets mailed to Elim Estate residents
- 2020: Consultation meetings with the Decima Street TRA
- January 2020: Consultation held at Decima Street Tenants Residents Association
- June-August 2020: Leaflet with an update sent to residents and follow-ups made via phone calls/email
- 30 September 2020: Webinar held between the developer, architect, landscape architect and the public
- October 2020: Letter sent to residents and the applicant carried outdoor knocking on Elim Estate
- October 2021: The applicant carried outdoor knocking on Elim Estate, drop-in consultation for Elim Estate residents and consultation leaflets mailed to Elim Estate residents
- November 2021: Drop-by exhibition at Elim ballcourt and school consultation carried out where officers spoke to 25+ parents and children.

Local planning authority consultation:

*Initial consultation dates*

140. The local planning authority consulted neighbouring properties within a 100m radius of the site by letter on 18 July 2022 in accordance with Southwark's Statement of Community Involvement.

<b>Neighbour Letters</b>	<b>Site Notice</b>	<b>Press Notice</b>	<b>Planning Register</b>
18 July 2022	Displayed – 6 July 2022	30 June 2022	Indefinitely

*Re-consultation dates*

<b>Neighbour Letters</b>	<b>Site Notice</b>	<b>Press Notice</b>	<b>Planning Register</b>
28 April 2025 - 20 May 2025	Displayed – 24 April 2025	29 April 2025	Indefinitely

141. Site visits have been undertaken by the Council on the following dates:

Date of visit
6 July 2022
25 April 2025

## **Assessment - Gunning Principle 2: Sufficient information provided**

142. Planning officers agree with the statement from the applicant that 'stakeholders were given access to clear and accessible information throughout the process. This included A1 display boards, leaflets, site plans, presentation materials, and regular "You Said, We Did" updates to support informed responses.' The amended documents supplied in 2025 have all been published on the planning register.

## **Assessment - Gunning Principle 3: Adequate time for consideration and response**

143. Planning officers agree with the statement from the applicant that 'the consultation was delivered over a sustained period (2018–2021), with multiple opportunities to engage at key milestones. A mix of in-person, online, and written formats was used to maximise accessibility and allow time for meaningful participation.'

## **Assessment - Gunning Principle 4: Feedback conscientiously taken into account**

144. Planning officers agree with the statement from the applicant that 'community feedback led to significant changes in the final proposals, including:

- Reduced building height and density
- Re-provision and relocation of the outdoor ball court
- Creation of a new community garden on the Triangle site, in place of a proposed affordable housing scheme
- Expanded tree planting and biodiversity measures
- Enhanced lighting, bin store design, parking, and access arrangements.'

## **Assessment**

145. Planning officers consider that a tenants and resident association (TRA) or a designated resident project group are not a prerequisite for adequate dissemination of information of the proposed development. The council considers that the consultation undertaken has not been in breach of the Gunning principles. Local residents have been able to provide their comments on the proposal, which have been taken into account in assessing the proposal.

## **Additional legal concerns**

146. Following re-consultation by the local planning authority objectors raised the

following additional legal concern -

Conflict of interest:

147. Enhanced Scrutiny Required: Under R(G) v Thanet DC [2021] EWHC 2026, the council's dual role as landowner and planning authority demands enhanced procedural safeguards that remain absent. This is compounded by the council's relationship with the applicant CBS, which operates in tandem with Leathermarket JMB - the TMO to which the council has delegated estate management. This web of interconnected interests - council as landowner, council as Planning Authority, JMB as the council's managing agent, and CBS as JMB's development partner - creates profound conflicts of interest that have not been addressed through any enhanced scrutiny or safeguards. The council cannot lawfully determine an application from an organisation so closely connected to its own delegated management structure without implementing rigorous procedural protections for affected tenants.'
148. Southwark Council operates under a written constitution that sets out how decisions are made. It ensures:
  - Transparency, efficiency, and accountability to residents
  - A legal framework for councilors and officers to act within
  - Some procedures are legally required, while others are locally chosen.
149. Routine applications are decided by senior officers and complex or controversial applications, such as this application, are referred to planning committees.

## **Application to be decided at Planning Committee October 2025**

150. The Amended application is due to come before the council's planning committee in October 2025. Officers have prepared a draft report for Committee ("the DOR"). The DOR recommends that the Amended application be granted planning permission.

### **Details of proposal**

151. Sites 1 and 2 would respectively provide 16 and 18 council homes at social rent. The dwelling mix over the two sites would be 16 one-bedroom flats, 9 two bedroom flats, 8 three-bedroom flats and 1 four-bedroom flat. The new buildings would have photovoltaic panels and air source heat pumps (ASHP) and green roofs.
152. A total of 11 trees would be removed of which 6 are category B trees and 5 are category C trees. Landscaping enhancements would include sites 3, 4 and 6 comprising soft landscaping, planting and a total of 35 new trees would be planted.
153. Three new bin stores are proposed. On site 1 the refuse lorry would circulate Pardoner Street. For site 2 bins would be collected from Long Lane with the aid of a new dropped kerb and from the western side off Elim Street.
154. A total 106 cycle parking spaces would be provided.

155. The site is located within the Controlled Parking Zone D, where parking restrictions operate between 08:30 and 18:30 hours Monday to Friday. There are 121 properties on the estate. Each property is allowed 1 resident permit and 1 visitor permit. Resident permits are valid for a year and visitors permits are valid for 3 months at a time. No new residents for the new proposed scheme will be offered car park spaces, with the exception off 3 accessible spaces that are proposed as part of this application (site 2). It is proposed to re-provide 35 formal spaces that are currently existing on the estate. In addition to these 35 spaces, the 3 additional blue badge parking spaces are proposed. The proposal also includes formalising 2 “informal” parking spaces on site 4 that have been used by existing residents with parking permits for more than 10 years. The bin store at site 6 is redundant and not used and its removal would facilitate the re-provision of two existing car parking spaces on site 2 that would be displaced by the re-provision of the MUGA / ball court.

Image: Proposed car parking Site 1



- 156. The proposed building would be six storeys with the top floor set back from elevations apart from the southeast elevation.
- 157. A total of 16 flats with a dwelling mix of 9 one-bedroom flats, 2 two-bedroom flats, 4 three-bedroom flats and 1 four-bedroom flat are proposed. It is proposed to locate 11 air source heat pumps (ASHP) and 40sqm of photovoltaic panels on the roof. A green roof is proposed to the fifth and sixth floors.
- 158. The ground floor would comprise the lower level of 3 maisonettes / duplex homes, a refuse store, cleaners' store, two plant rooms, rear entrance lobby, staircase, a lift and a cycle store for 40 cycle spaces. A total of 6 cycle spaces would be provided in the external cycle store and would comprise 4 Sheffield stand spaces, 1 accessible space and 1 cargo space. 4 visitor cycle spaces would be provided close to the front entrance lobby. The proposed first floor would comprise the upper floor of the 3 maisonettes (1 four bed and 2 three bed) and a one-bedroom flat. The proposed second and third floors would each comprise 4 flats, 3 one bedroom and 1 two bedrooms. The proposed fourth floor would comprise 2 one bed flats and the lower floors of 2 three-bedroom duplexes. The proposed fifth floor would comprise the upper floors of the 2 three-bedroom duplexes. Each flat would have a balcony.

Image: Site 1- Fronting Weston Street Proposed ground floor



159. The proposed façade treatments for the building would be horizontal bricks and masonry and green roofs are proposed.

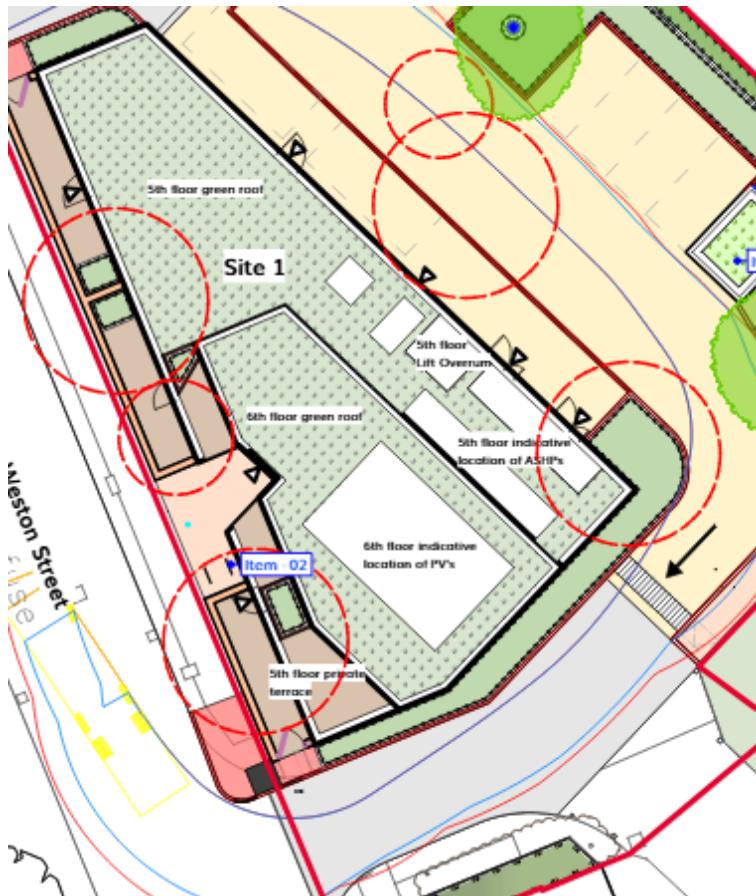
### Site 1

Image – Site 1 proposed development viewed from Weston Street



160. An existing single storey refuse store on the north side of the site would be re-provided and would comprise facing brickwork to match the main building. The external door would be galvanised steel with a PPC finish. The area to the north of the proposed refuse building would be landscaped. A second refuse store would be provided within the proposed building. A new one-way vehicular route with access off Weston Street is proposed and the existing 9 off-street car parking spaces on the site would be re-provided.
161. The development of site 1 would lead to the loss of 6 trees of which four are category B trees (T6 Sycamore, T8 (Indian bean), T9 Foxglove and T10 Indian bean) and two are category C Sycamore trees (T4 and T5). The species or category of the fourth tree along Weston Street, which has been planted since the application was submitted, is not known but it would also be removed. Three of the existing 9 trees shown on the plan below would be retained.

Image: 6 trees to be removed site 1 (circled in red)



162. Of the 12 existing garages to be demolished, 7 are void and 5 are currently rented out. Of the garages in use, 4 are rented by Elim tenants and 1 by an Elim leaseholder. These residents will be offered alternative garages elsewhere on the wider estate. The applicant has confirmed that none of the garages are used to store medical or disability-related equipment. The proposed development would not result in any reduction of parking provision on the estate.

## Site 2

## Image: Site 2 – Fronting Long Lane - Proposed ground floor



163. A part five, part six storey residential building of 18 flats is proposed. The dwelling mix would be 7 one-bedroom flats, 7 two- bedroom flats and 4 three - bedroom flats. The ground floor would comprise two entrance lobbies, plant room, refuse store, stairs, two lifts and the lower floors of 4 three-bedroom duplexes. The main access would be from Long Lane. A secondary entrance would be provided to the south within the Elim Estate. The first floor would comprise the upper floor of the duplexes and the second, third and fourth floors would each comprise 2 one bed and 2 two bed flats. The fifth floor would comprise 1 one bed and 1 two bed flat.
164. Each flat would have balconies at locations facing away from Long Lane where noise and air pollution is the greatest.
165. A total of 52 resident cycle spaces and 4 visitor spaces would be provided. One external cycle store would provide 40 cycle spaces whilst the second external cycle store would provide an additional 10 cycle spaces, 1 accessible space and 1 cargo space. The 4 visitor spaces would be provided to the front of the proposed building.

Image – proposed car parking site 2



166. The proposed façade treatments for the building would be horizontal bricks and masonry and green roofs are proposed.

Image – Site 2 proposed development viewed from Long Lane

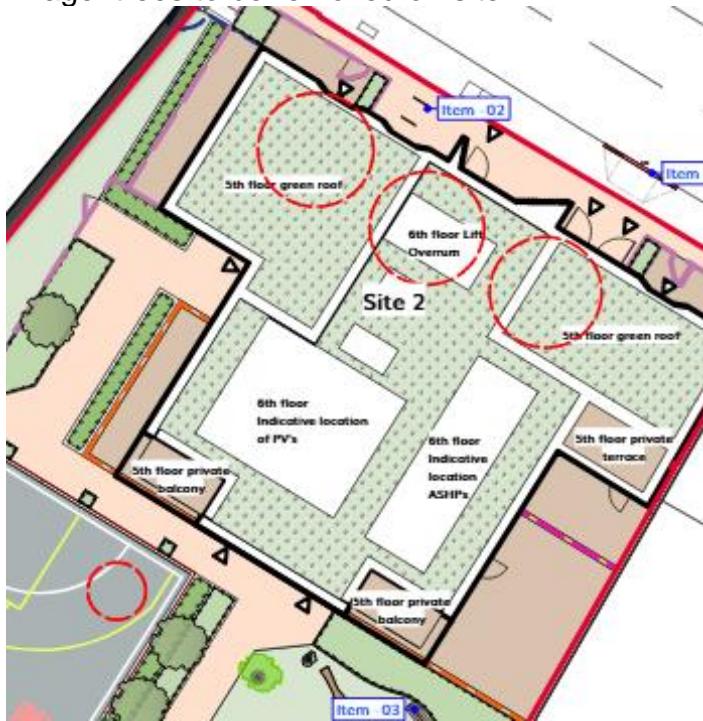


167. The existing MUGA / ball court is 344sqm and the replacement MUGA / ball court would be 300sqm.

168. The development of site 2 would lead to the loss of 4 trees, one category B Olive

tree (T17), two category B Willow trees (T14 and T16) and one category C Willow tree (T15). The proposed enhancement landscaping scheme on the site would include planting of three new trees.

Image: trees to be removed on site 2



### Site 3

Image: Site 3 On the corner of Long Lane and Weston Street



169. The three existing trees on the triangular part of the site and one recently planted tree to the west would be retained and eight new trees would be planted.

### Site 4

170. It is proposed to remove 1 tree (T26) and to relocate and provide an upgraded bin store. It would be less than half a meter from its current position.

Image: Site 4 – one tree to be removed



171. The core development proposals remain unchanged:

- 11 trees identified for removal (same tree numbers as 2022)
- 35 replacement trees proposed, maintaining a greater than 2:1 planting ratio
- 19 trees to be retained, subject to protective measures.

#### Amendments to the application since the 2023 planning committee

172. - Air quality assessment  
 - Amended Planning Drawings  
 - Arboricultural Impact Assessment  
 - Archaeology Assessment  
 - Biodiversity Impact Assessment  
 - Construction Management Plan  
 - Daylight and Sunlight Assessment  
 - Delivery and Servicing Plan  
 - Design and Access Statement (DAS)  
 - Early Engagement Strategy & Engagement Summary  
 - Ecology  
 - Energy and Sustainability Assessment  
 - Equality Impact Assessment (EQIA)  
 - Environmental Noise and Impact Assessment  
 - Financial Viability Clarification  
 - Flood Risk and Drainage Statement  
 - Fire Advice Note  
 - Overheating Assessment  
 - Planning Statement  
 - Sequential Test

- Site Investigation
- Sustainability Statement
- Transport Statement
- Travel Plan
- Utilities Statement

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

### Support

173. 52 comments of support have been received on the original application and 1 comment of support on the re-consultation. The matters initially supported include:

- Much needed Social Housing
- Improvements to landscape and the inclusion of green space
- Biodiversity improvements
- Quality of the design
- Enhanced sports facility
- Supporters have also commended the applicant on their public consultation.

The re-consultation comment of support raised the following additional matters:

- Equality Impact Assessment: Detailed analysis of how the design supports diverse needs, especially for children, women, and disabled people
- Inclusivity and Accessibility: The new ball court location is described as safer, more visible, and accessible
- Technical Updates: Flood risk and Sequential Test; Daylight/sunlight reassessment using latest BRE guidance; Air quality, noise, energy, fire safety, overheating — all updated to meet latest regulations
- Amenity Space: Mentioned as a provision, including children's play space and community garden
- Process Legitimacy: Asserts that the council has all necessary information for a fair and lawful decision.

### Objection

174. 52 comments of objection have been received on the original application and 3 comments of objection on the re-consultation.

The following concerns were raised on the original application:

- MUGA
- Ecology
- Security
- Trees
- Urban Greening Factor (UGF)
- Right to light
- Fire
- Transport

- Pre-application submission not provided.

The following concerns were raised in both the initial and re-consultation objections:

- Amenity impacts
- Air quality
- Consultation
- Design issues
- Flood risk
- Quality of accommodation
- Equality Impact Assessment
- Strain on existing community facilities
- Transport
- Equality Impact Assessment
- Strain on existing community facilities
- Conflict with local plan
- General dislike of proposal
- Information missing from plans

The re-consultation comment of objection raised the following additional matters:

- Grounds for judicial review
- Additional legal concerns regarding re-consultation.

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

175. Any decisions which are significant to the consideration of the current application are referred to within the relevant sections of the report. A fuller history of decisions relating to this site, and other nearby sites, is provided in Appendix 2.

## **KEY ISSUES FOR CONSIDERATION**

### **Summary of main issues**

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

- Principle of the proposed development in terms of land use
- Environmental impact assessment
- Housing mix, density and residential quality
- Affordable housing
- Amenity space and children's play space
- Design, including layout, building heights, landscaping and ecology
- Heritage considerations
- Archaeology
- Impact of proposed development on amenity of adjoining occupiers
- Transport and highways, including servicing, car and cycle parking
- Environmental matters
- Energy and sustainability, including carbon emission reduction
- Ecology and biodiversity

- Planning obligations (S.106 undertaking or agreement)
- Mayoral and borough community infrastructure levy (CIL)
- Consultation responses and community engagement
- Community impact, equalities assessment and human rights.

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

## Legal context

178. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. In this instance the development plan comprises the London Plan 2021 and the Southwark Plan 2022. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires decision-makers determining planning applications for development within Conservation Areas to pay special attention to the desirability of preserving or enhancing the character or appearance of that area. Section 66 of the Act also requires the Authority to pay special regard to the desirability of preserving listed buildings and their setting or any features of special architectural or historic interest which they possess.

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

## Planning policy

180. The statutory development plans for the Borough comprise the London Plan 2021 and the Southwark Plan 2022. The National Planning Policy Framework (2024) and emerging policies constitute material considerations but are not part of the statutory development plan. A list of policies which are relevant to this application is provided at Appendix 2. Any policies which are particularly relevant to the consideration of this application are highlighted in the report.

## ASSESSMENT

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

181. Objectors initially raised concerns that sites 1 and 2 should not be used for housing and instead the council should prioritise provision of open green space in accordance with policy P57 Open Space of the Southwark Plan and that the development would be contrary to the Southwark Plan as it is not identified within council site allocations for potential housing development. Following re-consultation by the local planning authority in 2025 objectors raised the following concerns to alleged breaches to 'Southwark Plan Policy P56 (Open Space) and Policy P18 (Efficient Use of Land): New development should not result in net loss of play provision unless replacement facilities are made or specific criteria are met. The reduction in ballcourt size represents a net loss of active play space that has not been adequately justified or compensated by Leathermarket CBS. This loss is particularly problematic given that Policy P18 requires efficient use of land to be balanced against protecting existing community facilities and

ensuring adequate provision for increased population density.'

Housing and open space

182. Sites 1 and 2 are not designated as other open space and Policy P56 Open Space of the Southwark Plan does not apply. The sites are part of a housing estate and as the principle of residential use has been established it would be appropriate to build new social housing in this context.

Multi Use Games Area (MUGA) / ball court

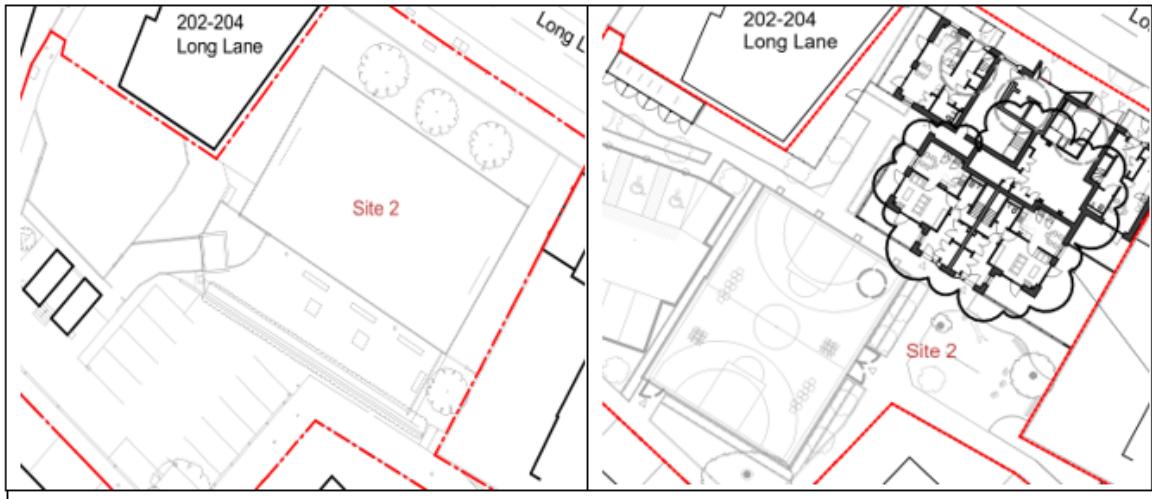
183. Objectors advised that they petitioned (the applicant) for the retention of the existing MUGA and alleged that planning officers ignored this request. The role of planning officers however is to assess planning applications submitted and in this case the proposal is for the replacement of the MUGA, (albeit slightly smaller in size) the principle of which is agreed given the planning balance resulting in the addition of new council homes.

184. The proposed development would comply with Policy 45 Healthy developments of the Southwark Plan which states that development must retain or pre-provide existing health, community, sport and leisure facilities.

185. Policy S4 Play and informal recreation of the London Plan states that development proposals for schemes that are likely to be used by children and young people should not result in the net loss of play provision, unless it can be demonstrated that there is no ongoing or future demand.

186. The existing MUGA / ball court is 344sqm and the replacement MUGA / ball court would be 300sqm. In terms of Policy S4 of the London Plan the development would result in a net loss of 44sqm of play provision.

Image: existing (left) and proposed (right) MUGA / ballcourt



187. Neither the existing MUGA / ball court or the proposed MUGA / ball court can fit a Sport England sized basketball court or a 5-a-side pitch. However, the new MUGA would be marked at both goal ends for basketball and football and although smaller than the existing it is considered that the community provision on the Estate would be improved as the surface would be of a better quality than the existing. The MUGA would be built before the existing ball court is closed for construction of council homes. This arrangement would be secured by a legal agreement.

188. The new ballcourt would encourage wider and more inclusive use. The applicant advise that their 'engagement and surveys highlighted key limitations with the existing ball court:

- Used primarily by young males.
- Suffers from anti-social behaviour – one cause of which is poor overlooking
- Offers limited inclusion for females, disabled residents, and younger children.

189. The re-provided ball court has been designed to address these issues and broaden participation:

- Safer, better-overlooked location
- Relocated to the centre of the estate to enhance natural surveillance and reduce ASB
- Mesh fencing enables passive monitoring while maintaining security.
- Encouraging female participation
- Rubberised surfacing reduces injury risk, boosting confidence for young females
- Relocation and safety improvements make females more comfortable and empowered to participate
- Wider community access
- Inclusive play markings suitable for younger children
- Safer surfaces and improved visibility benefit disabled residents and elderly users.

190. Objectors requested that if the council is minded approving the planning application, the ball court be conditioned so that it cannot be removed. It is however not appropriate to grant permission subject to such a condition as any material change of use to the ball court would require planning permission and this is sufficient to maintain its continued use.

Children's play area and efficient use of land

191. Objectors raised concerns that the Council's Children and Youth Play team were not consulted. Officers consulted the Children and Youth Play and the following comments were received in 2023 from the Council's Head of Culture: 'My remit includes youth work related services and three adventure play sites. It doesn't extend to regular playgrounds and sports provision. Having said that I did have a look at the proposals and noticed that the ball court / Multi-Use Games Area (MUGA) would be replaced by a new external MUGA / community / sports / play facility and that the existing children's play area would be replaced by a new children's play areas. I also noted that there is a very small loss of MUGA square footage but a considerable gain in terms of children's play area. Based on all of the above I don't have any formal comments to make.'

192. The council's Children and Youth Play team were re-consulted in 2025, but no comments have been received.

193. The existing children's play area on the estate of 170sqm, which is in near proximity to site 2, would be replaced by a new children's play area on site 2 of 119sqm. A new play area of 814sqm is also proposed on site 4. Both the existing and new residents of the Elim Estate will benefit from these newly enhanced spaces and an increased play area of 765sqm.

194. The proposed development would be an efficient use of land.

**Environmental impact assessment**

195. The proposed development does not meet or exceed any of the thresholds set out in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 and as such an EIA is not required in this instance.

**Mix of dwellings**

196. London Plan policies H10 and GG4 highlights the requirement to provide a mix of dwelling sizes and types to cater for the range of housing needs of the area. In terms of local policy, Policy P2 of the New Southwark Plan sets out that major developments must provide a minimum of 60% of homes with two or more bedrooms, a minimum of 20% family homes with three or more bedrooms and a maximum of 5% studios.

197. The applicant confirmed in September 2025 that 'demand remains strong across all bedroom sizes, reflecting the sustained need for council-rent homes over the past two years. To support right-sizing, the proposals include a broad range of one-bed homes for downsizers, helping to free up larger family homes. The mix across the new schemes has been set to align as closely as possible with

evidenced housing need.'

Sites 1 and 2 are assessed as one proposal with a total of 34 flats. The dwelling mix over the two sites would be 16 one-bedroom flats, 9 two-bedroom flats, 9 three-bedroom flats and 1 four-bedroom flat.

Image - Mix of dwellings

Unit type	Number of units	Percentage of units	Southwark Plan Policy P2 requirement: minimum of
Studio	-	-	5%
1-bed	16	47%	N/A
2-bed	9	26.5%	N/A
2-bed+			60%
3-bed+	9	26.5%	20%
Total	34		

198. The proposal would not comply with the dwelling mix as per policy P2 New family homes of the Southwark Plan as only 53% two or more-bedroom flats would be provided and would fall short of the minimum of 60% of two or more-bedroom homes required. However, the proposed dwelling mix is provided following a survey on housing need by Leathermarket Community Benefit Society. The 2023 survey identified 38% of Elim Estate residents as living in homes that do not meet their needs. The proposed dwelling mix would be acceptable as over the estate the dwelling mix of the proposals with the existing estate, 62.3% of the properties would be two bed or more.
199. The provision of 26.5% three beds and more flats and the provision of fewer than 5% studios would be policy compliant.

## Wheelchair accessible housing

200. As 3 of the 34 proposed flats would be wheelchair accessible flats, a 9% provision would be marginally below the 10% required by London Plan policy D7 and policy P8 of the Southwark Plan. These policies state that proposals must be designed to ensure ease of access and movement for people with disabilities, both physical and sensory. The development would also provide one lift per core as a suitably sized fire evacuation lift to be used to evacuate people who require level access from the building, in accordance with London Plan policy D5 Inclusive design.
201. Planning officers recommend permission be subject to a prior to commencement of above grade works condition, requiring the applicant to submit details that relevant standards in the Approved Document M of the Building Regulations 2015 (As Amended) would be met for the wheelchair units. This would ensure the development complies with Policy D7 (Accessible housing) of the London Plan (2021) and Policy P8 (Wheelchair accessible and adaptable housing) of the Southwark Plan (2022). The approval of these details would also be referred to in the legal agreement.

## Quality of accommodation

202. Objectors raised concerns that the development would provide a poor quality of accommodation for future occupiers. The assessment below however shows that the majority of the flats in the proposed development would comply with policy P14 of the Southwark Plan as it would provide a high standard of quality of accommodation for living conditions.

### Unit sizes

203. All the flats would meet or exceed the minimum dwellings size standards of policy D6 of the London Plan, the Mayor's Housing SPG and the Residential Design Standards Supplementary Planning Document.

#### Image – unit sizes

Flats	SPD minimum sqm	Proposed unit sizes sqm
1-bed	50	51-53
2-bed	61-79	62-74
3-bed	74-102	97- 114
4-bed	115	136

#### *Site 1*

204. Four of the 6 one-bedroom flats proposed would have undersized open plan living/kitchen/dining rooms and would provide 23sqm where 24sqm would be required for one-bedroom flats. This shortfall would be acceptable as the overall unit sizes and internal storage spaces would exceed the minimum requirements and would provide good quality internal space. The other 10 flats proposed would meet or exceed the minimum internal space standards set out in policy D6 of the London Plan, the Mayor's Housing SPG and the Residential Design Standards Supplementary Planning Document.

#### *Site 2*

205. All the proposed flats, apart from 3 two-bedroom wheelchair flats on the first, second and third floors would have undersized open plan living/kitchen/dining rooms and would provide 25.5sqm where 27sqm is required. This a small shortfall and on balance these three flats would provide generous storage space and a pragmatic layout that would provide good quality of accommodation for future occupiers. All flats would meet or exceed the minimum internal space standards Set out in policy D6 of the London Plan and the Mayor's Housing SPG and the Residential Design Standards Supplementary Planning Document.

### Internal daylight and sunlight

206. The flats would be dual aspect, apart from 2 south facing flats, with windows to all habitable rooms and the proposed dwellings would therefore be afforded good levels of light and outlook.

### Daylight

207. The Daylight Illuminance method utilises climactic data for the location of the site, based on a weather file for a typical or average year, to calculate the illuminance at points within a room on at least hourly intervals across a year. The illuminance is calculated across an assessment grid sat at the reference plane (usually desk height).
208. BRE guidance provides target illuminance levels that should be achieved across at least half of the reference plane for half of the daylight hours within a year. The targets set out within the national annex are as follows:
  - Bedrooms – 100 Lux
  - Living Rooms – 150 Lux
  - Kitchens – 200 Lux

#### Site 1

209. The applicant included 49 habitable rooms of the proposed flats in the assessment. Of these only 2 (4%) would fall short of the BRE criteria in that respectively one kitchen/dining room (R6) on the ground floor and one other rooms (R6) on the first floor that would fall below the recommended level. Room R6 on the first floor would have a window located beneath an external balcony.

#### Site 2

210. The applicant included 55 habitable rooms of the proposed flats in the assessment. Of these 55 habitable rooms only 5 (9%) would fall short of the BRE criteria in that respectively three kitchen/dining rooms (R2, R5 and R6) on the ground floor and two other rooms (R4 and R11) on the first floor that would fall below the recommended level. The BRE guidance states that 'balconies and overhangs significantly reduce the light entering windows below them'. As rooms R4 and R11 would both have windows located beneath external balconies the light entering would be significantly reduced.

#### Sunlight

211. In respect of direct sunlight, the 2022 BRE guidance reflects the BS EN17037 recommendation that a space should receive a minimum of 1.5 hours of direct sunlight on a selected date between 1st February and 21st March with cloudless conditions. It is suggested that 21st March (equinox) be used for the assessment.

#### Site 1

212. The applicant included 16 living rooms in the assessment with a 100% meeting the above target.

#### Site 2

213. The applicant only included 18 living rooms / open plan kitchen / living /dining rooms in the assessment of which 3 (17%) not meeting the above target. The 3 living rooms that would fall below the sunlight target would have windows located beneath external balconies.

### Privacy and overlooking

#### Site 1

214. No issues identified as the layout would not lead to any mutual overlooking from the proposed flats.

#### Site 2

215. Obscured windows are proposed for bedrooms in close proximity to the proposed balconies of flats to the front half of the proposed building. It is recommended that this be secured by condition to prevent mutual overlooking within the proposed development and to protect the amenity of future occupiers. .

### Amenity space

#### Site 1

216. The four ground and first floor maisonettes would have front gardens of respectively 13.18sqm, 9.51sqm and 9.68sqm. The maisonettes and all the one bedroom flats on the first floor and all flats on the second, third and fourth floors would have balconies of respectively 5.86sqm, 5.44sqm and 7.91sqm. The other flats on these floors would have 5.71sqm balconies and the two maisonettes over the fourth and fifth floor would also have terraces of respectively 18.3sqm and 13.58sqm. The location of the site fronting Weston Street and within a hard landscaped parking area would severely constrain the potential locations to provide a communal amenity space in a safe and practical manner. It is therefore a requirement to provide an s106 contribution of £22,700 towards the shortfall of 60.73sqm private amenity space and shortfall of 50sqm of communal amenity space.

#### Site 2

217. Each flat would either have a 6.11sqm, 6.15sqm or 6.25sqm balcony, apart from two flats which would have an additional roof terrace (on the top floor) of respectively 16.52sqm and 18.5sqm. Not all flats would have adequate private amenity space and no communal amenity space would be provided. The two proposed 'maintenance terraces' on the roof would not be communal amenity spaces. It is therefore a requirement to provide an s106 contribution of £23,540 towards the shortfall of 64.83sqm private amenity space and shortfall of 50sqm of communal amenity space.

### Child play space

218. Objectors initially raised concerns that the development would lead to a reduction of play space which would impact older children more and that the council's children and youth play team was not consulted.

219. Following re-consultation by the local planning authority objectors raised the following concerns to alleged breaches to London Plan Policy G4 (Open Space)

and Policy S4 (Play and Informal Recreation): 'Leathermarket CBS's proposal results in a net loss of active play space through reduction of the existing ballcourt whilst simultaneously increasing population density by adding 34 new homes. This creates a fundamental policy conflict where play provision per capita decreases as child population increases. Policy S4 specifically requires that development should incorporate good quality, accessible play provision and that the loss of play facilities should be resisted unless adequate reproposal is made, which has not occurred here.'

220. The GLA's play space calculator sets out that the development would need to provide a total of 319.5sqm of child play space broken down as follows:

Image - play space calculation

Age group	Playspace requirement (sqm)
Under 5	145
5-11	106
12+	63

221. The existing children's play area on site 2 on the estate is 170sqm and would be replaced by a new children's doorstep play area to the west which would exceed the requirement of 145sqm play space as it would provide 814sqm play space for children under 5 on housing amenity land on site 4.

222. A second play space would be located on site 2 comprising 119sqm for children aged 5-11. This would exceed the required plays space of 106sqm for children aged 5-11.

223. The proposed development would not provide new play space for children aged 12+ and the proposed MUGA / ball court would be 44sqm smaller than the existing MUGA / ball court. However, the new MUGA would be marked at both goal ends for basketball and football and although smaller than the existing it is considered that the community provision on the Estate would be improved as the surface would be of a better quality than the existing. Planning officers consider that MUGA / ball court would provide a good quality play area for children aged 12+ and would be of a better quality than the existing ball court.

224. The total area of play space would comprise 935sqm and both these play areas would be accessible to existing and future occupiers of the estate. Details of the proposed hard and soft landscaping and play equipment on site 2 and site 4 would be secured by a pre-commencement condition.

225. The council's children and youth Play team were consulted, but no comments have been received.

#### Noise

226. The Noise and Impact Assessment indicate that the specified glazing and ventilation system would produce an internal noise environment that would meet with council criteria, and it is recommended that permission be subject to a compliance condition to ensure that internal noise levels of the new flats are not exceeded due to environmental noise.

227. The noise report indicates that the noise level of some of the balconies to the proposed flats on site 2 would not meet the 50- 55dB(A) LAeq, 16hr. The applicant would be required to apply further attenuation works to achieve the best possible noise level and should consider use of imperforated high balustrades and absorption on balcony soffits. It is recommended that permission be granted subject to a prior to occupation condition that private and communal external amenity areas be designed to attain 50dB(A) LAeq, 16hr †. †Daytime - 16 hours between 07:00-23:00hrs.

## Affordable housing

228. All 34 proposed flats would be social rented affordable units. The emphasis of the New Homes Programme is to provide as many homes for social rent as would be viable to meet the needs of the Borough. This proposal is in line with the current objectives of the council and the direction set out within the New Southwark Plan and to meet the council's overall objective to provide more affordable housing. Importantly, the proposal would help address the housing need that there is within the estate as some households are in overcrowded homes.

229. The 34 social-rent homes to be provided as part of the Elim scheme will contribute to meeting the very high levels of housing need on the Elim Estate (including families living in bedsits with 2 or 3 children on the Elim Estate). The homes will also contribute to meeting the very high levels of housing needs across the wider Leathermarket JMB area and across Southwark. Affordable housing need across the borough has intensified since the 2023 baseline. The 2023 officer report stated that over 13,000 households are on the housing need register. This total included 3,300 households in temporary accommodation. At the time of writing the officer report, September 2025, more than 20,000 households are on the housing needs register. This total includes 4,000 households in temporary accommodation.

Image – housing need

	2023 baseline	2025 position	increase since 2023
Households on housing register	13,000	20,000+ 7,000+	
Households in temporary accommodation	3,300+	4,000+ 700+ increase since 2023	

230. Following re-consultation by the local planning authority objectors raised concerns that 'new social rent housing in prime SE1 is'... 'not appropriate. The poor level of schools in the area is one' of 'the reason many professionals with kids don't settle and leave the area which remain de facto the preserve of young professionals or underprivileged/on benefit for life families.' The objector states that they 'would support the project if it was dedicated and made eligible solely to people working for a minimum of 5 years in local schools, hospitals or lower paid services.'

231. Policy P1 (Social rented and intermediate housing) of the Southwark Plan defines social rent housing as 'Homes where rents must not exceed the rent levels determined by the formula set out in the HCA Rent Standard Guidance.' This policy is not restrictive in terms of eligibility as stated by the objector above.

## Design

232. The applicant has submitted amended planning drawings as part of the amended supporting documentation for the application. The architectural plans for Sites 1 and 2 have been updated to reflect compliance with revised guidance and minor design adjustments.

Key updates include:

- Revised building cores to incorporate an evacuation shaft containing an evacuation lobby, lift(s), stair, and temporary waiting space, with lobbies ventilated via external wall vents
- Introduction of 1.5m<sup>2</sup> natural ventilation smoke vents to adjacent lobbies from which flat doors are accessed, in line with BS 9991
- Increased size of some utility cupboards
- Reconfigured balcony doors and windows to ensure egress routes are located 1.8m away from kitchen hobs
- Additional air source heat pump (ASHP) added to the roof of Site 1 (previously omitted)
- Internal door added to the 3B6P duplex flat on Site 2
- Risers extended to the roofs
- Food waste containers added to internal refuse stores
- Full-height fixed glazing adjacent to terrace and bedroom windows changed to include an opening top section at Site 1 and Site 2
- Slight increase in size of the living/kitchen/dining room in the 2B3P wheelchair-accessible flats on Site 2
- Window opening styles indicated on all elevations.

233. The applicant has also submitted a Design and Access Statement as part of the amended supporting documentation for the application. The applicant states that 'the Design and Access Statement has been updated as follows:

- Company addresses updated
- Project brief updated to note completion of Joyce Newham House and Joseph Lancaster Terrace
- Southwark policy map updated
- Listed building and conservation area map updated to reflect that 208 Long Lane is locally listed
- Drawings and diagrams, including those in the Further Technical Considerations chapter, updated to latest versions.'

## Design quality

234. Objectors raised concerns that the lack of outdoor space constitutes overdevelopment, the buildings would be too high, detailed design of the façades would be too linear and repetitive and would not consider contextual design and

local character of the surrounding area and would be poor quality architectural design. There are also concerns that the scale and massing of the developments would be unsuitable and would harm the street scene. These matters are addressed in the assessment of sites 1 and 2 below

### Site 1 Weston Street frontage

#### Site context

235. The site is surrounded by 4 and 5 storey estate apartment blocks and just to the north, further up Weston Street at a prominent bend in the street, a former pub dating from the Victorian era, now converted to flats. The post war buildings of the estate are largely in a stripped down 'art deco' style with stripes of contrasting brickwork to the facades emphasising the horizontal proportions of the blocks. The buildings are set back from the street fronts behind grass planting strips and street trees add a degree of leafiness to the estate. Within the context set out above, site 1 stands out as a gap in the townscape.

#### Height scale, massing, architectural design and materials

Image – Emerging context



236. The proposed part five, part six storey building would present a broadly similar length of frontage to Weston Street as existing blocks and the general height of

the building of five storeys would be comparable to the highest blocks of the estate, which are also five storeys. The sixth floor would only cover part of the footprint and would be set back so as to be subservient. Our design and conservation team advised in 2025 that they 'took into account that the 6th storey is not a full floor of accommodation but is well set-back from the front (1.8m) and rear facades (4.5m) and over 13.5 from the north edge of the building (taking up less than half of the roof plan). This means that the massing at this level will be less prominent when viewed from the street and will not appear discordant in the context of Weston Street.' The building would thus be of the same order of height as existing estate buildings and would be acceptable.

- 237. The wedged shaped footprint would result in a bulkier building than the relatively narrow estate buildings and the footprint would be a product of the geometry that is set up by the adjacent bend in the road of Weston Street. The building would have a dramatic 'flat iron' profile that would rise above the adjacent former pub in views from the north along Weston Street and the landmark status that would result from this would be justified by prominence of the site adjacent to the bend. Elsewhere the bulk of the scheme would not be particularly obvious.
- 238. Irrespective of bulk and height, the setting of the building would be softened by generous setback behind small front gardens as existing estate buildings. The elevations of the building would be a successful modern interpretation of existing estate architecture and would match the general simplicity of existing estate buildings and would follow a similar aesthetic of horizontal bands of contrasting brick with windows set into alternating bands. Balconies inset within the banding would provide additional depth. The ground floor frontage to Weston Street would be enlivened by front doors of duplexes, the recessed main entrance to upper floor apartments and by small front gardens behind low brick walls. This would add some interest and life to the street and would be an acceptable design approach.

## Site 2 Long Lane frontage

### Site context

- 239. Site 2 comprise an open games area and forms a gap in the building frontage of Long Lane. Long Lane has a varied scale and fractured appearance, comprising elements of traditional Victorian townhouses and larger converted Victorian warehouses mainly to the east of the estate; pockets of open space and car parking associated with Council estates that back onto the road (including Elim Estate); and larger scaled mixed-use developments of the early 2000s that intervene and form the main street frontage along the north side of Long Lane.

### Height scale, massing, architectural design and materials

Image: view from the south-west



- 240. The location of an open games area forms a gap in the building frontage of Long Lane and the proposed development offers the opportunity to improve the townscape of this part of Long Lane.
- 241. The proposed building would infill the frontage by conjoining the neighbouring building to the east, a robust traditional warehouse 4 and half storeys in height, and would leave a small gap with the neighbouring building to the west, a smaller four storey modern residential building. Like both these buildings it would come right forward to the street frontage with a residential entrance that would enliven the street scene.
- 242. The massing, at five main storeys with the sixth floor set back, would be comparable to that of the adjacent warehouse building, albeit a little higher. The building would rise considerably higher than the building to the west, but would be conspicuously less tall and bulky than the modern commercial/ residential building on the opposite side of Long Lane. In general therefore its height mass and relationship to Long Lane would be acceptable.
- 243. The building would have a T shaped footprint with the end of the T presenting itself on Long Lane as an additional sixth storey set back and would therefore be a secondary element and would be relatively inconspicuous.
- 244. The rear of the site is the location of estate car parking, landscaping and a play area and is thus relatively spacious such that the proposed building would not be unduly dominant or overbearing on the somewhat smaller four storey estate buildings to the south. In general, therefore the proposed massing and footprint of the building would be acceptable

- 245. The architecture of the Long Lane frontage of the building would feature large deep set windows, the size and depth of which would be emphasised by recessed and stepping brickwork. The ground floor of the building would be emphasised by the prominent communal residential entrance and large windows and doors to the ground floor flats. The recessed top floor would have brickwork that would consist of projecting vertical brick courses.
- 246. This arrangement of a tough base, a middle and a top is one typically seen on classical buildings, including some warehouses. In this respect the proposed front elevation would be a successful modern-day interpretation of traditional and tough warehouse architecture seen in Southwark and elsewhere. Given its location alongside one such building, this would be appropriate.
- 247. The rear elevations of the building would be simplified as compared to the front elevation. Above the recessed balconies windows would line up in horizontal bands. This aesthetic would be derived from existing estate architecture, although due to the use of one single material, brick, and the scale of the building it would be somewhat tougher.

A condition of detailed designs and material finishes is therefore recommended.

## Site 5

- 248. The proposed timber fences and gate to a height of 1.1m would be acceptable as it would match the material and height of the existing timber fencing on the site. Planning officers do not consider that the development would have any impact or be harmful to any designated heritage assets.

### Landscaping and trees

- 249. There are currently 31 trees on sites 1, 2 and 4, of which 11 trees - 6 category B trees and 5 category C trees - would be removed. Three trees would also be removed on site 1 along Weston Street, including one that was replaced in 2023.
- 250. The proposed enhancement landscaping would include planting of 35 new trees. It is proposed to plant 15 trees on site 2, 9 trees on site 3, 7 trees on site 4 and 4 trees on site 6.

Image: Proposed tree planting on site 2 (15 trees)



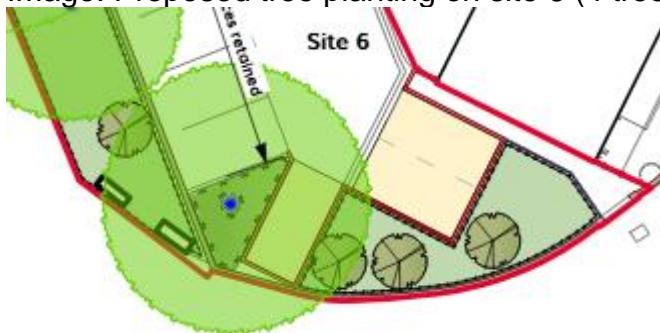
Image: Proposed tree planting on site 3 (9 trees)



Image: Proposed tree planting on site 4 (7 trees)



Image: Proposed tree planting on site 6 (4 trees)



251. The applicant has submitted an Arboricultural Impact Assessment as part of the amended supporting documentation for the application. The Arboricultural Impact Assessment (AIA) for the Elim Estate was updated in October 2024, building on the original May 2022 version.

Key updates in the October 2024 revision:

- A second site visit undertaken in August 2024 to verify tree locations and condition
- Confirmation that Tree T29 was removed between 2021 and 2024 and has since been replaced. However, the size of the tree is too small to be recorded in the AIA.
- Updated authorship, document references, and drawings reissued in October 2024 Core development proposals remain unchanged:
- 11 trees identified for removal (same tree numbers as 2022)
- 35 replacement trees proposed, maintaining a greater than 2:1 planting ratio
- 19 trees to be retained, subject to protective measures
- No changes to landscape proposals, methodology, or impact conclusions

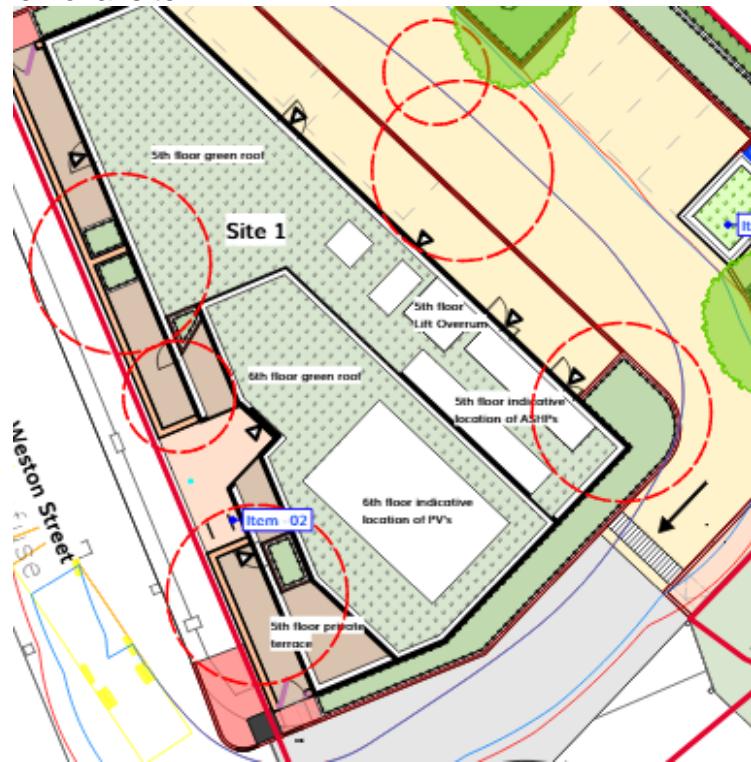
Overall, the 2024 update refreshes the report and confirms the proposals remain aligned with strategic and local policy

- 252. Initially objectors raised concerns that the capital asset value for amenity trees (CAVAT) assessment calculation was incorrect, that the loss of trees would further reduce Southwark tree canopy coverage, the development would lead to a loss of mature trees and it is questioned whether more mature trees can be saved.
- 253. An amended landscaping plan was submitted during the initial assessment of the application. The initial CAVAT assessment was incorrect and the council's urban forester provided an updated CAVAT assessment. Through comparison between the CAVAT assessment of the removed trees and the proposed planting, there would be a net loss of £52,485 amenity tree value. This loss would be mitigated through a financial contribution to provide off-site trees where they can be accommodated as part of a S106 legal agreement. The landscaping strategy would now also include the species Pyrus calleryana 'Chanticleer', two additional trees – one tree as a semimature Pyrus and the other a semi-mature Prunus and three extra heavy standard Birch which have been replaced with semi-mature Pyrus.
- 254. Objectors also initially raised concerns that the proposal does not refer to Heygate Legacy trees, which must be replaced with a minimum of 4 trees it embodies.

#### Site 1

- 255. The development of site 1 would lead to the loss of 6 trees of which four are category B trees (T6 Sycamore, T8 (Indian bean), T9 (Foxglove) and T10 (Indian bean) and two are category C Sycamore trees (T4 and T5). The species or category of the fourth tree along Weston Street, which has been planted since the application was submitted, is not known but it would also be removed. The Council's Urban Forester advised that 1 Heygate Legacy tree have been planted on Elim Estate, a category B tree (T9 (Foxglove)) and would be removed as part of the current planning application. Following detailed discussions, the need for the loss of mature trees facing Weston Street and to the rear of the new residential block has been substantiated. A suitable replacement planting plan has been proposed to help mitigate the loss of canopy cover.

Image – Tree removal site 1



Site 2

256. The development of site 2 would lead to the loss of 4 trees, one category B Olive tree (T17), two category willow trees (T14 and T16) and one category C Willow tree (T15). The proposed enhancement landscaping scheme on the site would be acceptable and would include planting of three new trees. A suitable arrangement of play equipment has also been proposed within the vicinity of trees and the MUGA would be screened by planting.

257. A suitable replacement planting plan for the estate has been proposed to help mitigate the loss of canopy cover.

Image: proposed landscaping plan site 2



### Site 3

258. Eight new trees would be planted on site 3. It is recommended that permission be subject to conditions relating to hard and soft landscaping, landscape management plan, an Arboricultural Method Statement and details of tree planting to ensure the proposed development will preserve and enhance the visual amenities of the locality and is designed for the maximum benefit of local biodiversity.

### Site 4

259. There is no objection to the removal of tree T26 as it has low vigour and is unsuitable for retention.

#### Landscaping conclusion:

260. Planning Officers recommend permission be granted subject to a tree planting condition which would include the provision of more drought tolerant species.

### Urban Greening Factor (UGF)

261. Initially objectors raised concerns that the inclusion of one existing new Southwark Council tree, already planted on Weston Street (site 3), is a misleading UGF calculation and question the addition of more green items on already green space, in particular sites 3,4,5 and 6. Objectors also raised concerns about the significant weighting of the green roofs in the Urban Greening calculations.

262. Policy G5 Urban greening of the London Plan states that a major development proposal should contribute to the greening of London by including urban greening as a fundamental element of site and building design and recommends a target score of 0.4 for developments that are predominately residential. For the purposes of calculating the UGF green roofs can be used to form part of the calculation.

263. The proposed development would incorporate measures such as high-quality landscaping, trees and green roofs (462sqm) and would achieve an urban greening factor of 0.433. It was agreed with the Southwark tree officer that planting a tree on Weston Street (site 3) would be part of the project, but the tree has already been planted. The reason why the proposal includes sites 3, 4, 5 and 6 is that landscape enhancement are proposed across the estate as part of the planning application.

### Ecology and biodiversity

264. The applicant has submitted amended supporting Ecology documentation for the application. The applicant states that 'an updated Preliminary Ecological Appraisal (PEA) was undertaken in August 2024. With a conclusion as follows:

The PEA identified the habitat on site to be of negligible ecological value. The assessment has confirmed that the site has potential to support the following protected/notable species.

- Low potential to support foraging and commuting bats
- Low potential to support roosting bats; and
- High potential to support nesting birds.

Key mitigation, compensation and enhancement actions are described to enable legislative and policy compliance, aiming to achieve net gains in biodiversity for the site.'

265. Following re-consultation our Ecologist advised that 'the proposed biodiverse green roofs should include a low nutrient substrate with a varied depth of 150mm-200mm. The roofs should be seeded and plug planted with wildflower species and meet the requirements of GRO Code. Features for invertebrates such as log and sand piles should be included. Sedum species should be avoided. This style of green roof is compatible with PV arrays. Recommended conditions in line with previous ecology comments: Bat boxes x 6; Invertebrate features x 6; Bird boxes x 18; Green roof, and LEMP to include green roofs, habitat features and ground level landscaping. Recommended informative - Nesting birds.'

### Biodiversity Net Gain

266. The application has submitted a full Biodiversity Net Gain (BNG) Assessment as part of the amended supporting documentation for the application. The applicant states that 'the Biodiversity Impact Assessment (BIA) for the Elim Estate has been updated from the May 2022 version, with the January 2024 report calculating a Biodiversity Net Gain (BNG) of 77.84%. All relevant biodiversity metric trading rules are met. The update aligns with national and local planning policy, including the 2024 NPPF, London Plan (Policies G1, G5, G6, G7), and the Southwark Local Plan (Policies P57–P61).'

267. Following re-consultation in 2025 our Ecologist advised that although submitted

prior to mandatory BNG the application has demonstrated that it is providing a net gain for biodiversity.

268. 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.

### Designing out crime

269. Objectors initially raised concerns that the development would create a corridor behind some properties that would increase crime.

270. Following the 2025 re-consultation TfL states that 'Policy T5 requires cycle parking quality to meet the London Cycling Design Standards (LCDS), which requires cycle parking to be secure, well-located (close to the entrance of the property), covered, fully accessible and managed. TfL do not consider that cycle parking is "well-located". TfL note 'access to the cycle store for Site 1 is directly from the public realm, and are concerned about the personal safety of users. Cyclists could be tailgated into the store with no means of escape. TfL request that either access is directly from the residential building or a secondary access to the store is provided. Amendments to align with the LCDS are required prior to determination to align with London Plan policy.' TfL also note the 'cycle store for Site 2 is approx. 20-

30m from the entrance to the building and in the corner of the site. TfL are concerned that, especially at night, this will not feel safe, contrary to the Healthy Streets indicator "people feel safe" in Policy T2. This would also discourage cycling, contrary to Policy T5. TfL recommend that cycle parking is accessed within the residential building or is located closer to the entrances in areas which feel safe.'

271. The Metropolitan Police, in their 2022 comment, did not however raise any issues and recommended that permission be granted subject to a condition of details of security measures to improve community safety and crime prevention. The addendum to the 2023 officer committee report clarified that 'a secured by design certification preoccupation condition' was 'recommended by the Metropolitan Police'. No further comments have been received from The Metropolitan Police following the 2025 re-consultation. Planning officers recommend that permission be granted subject to a 'Secure By Design Measures' condition and a 'Secured by Design Certification' condition.

### Fire safety

272. The applicant has submitted a Fire Advice Note as part of the amended supporting documentation for the application. The applicant states that 'the Fire Advice Note has been updated to reflect technical amendments arising from the adoption of BS 9991:2024, which replaces the previous BS 9991:2015.

Amendments reflected in the revised drawings and fire strategy include:

- A revised approach to evacuation lifts, which are now accessed from a protected lobby rather than directly off the corridor, as in the previous design
- External wall assessments carried out using BR 187 guidance, confirming that fire spread is addressed by external wall construction
- Introduction of smoke vents and temporary waiting spaces
- Minor internal layout changes, including the addition of protected lobbies, reconfigured stair cores, and updated riser positions
- Localised revisions to bathrooms, kitchens, stores, and balconies to align with revised fire safety requirements
- Targeted updates to doors and access points, including removal, relocation, and reconfiguration to support protected egress
- Addition and repositioning of mechanical risers, smoke shafts, AOVs and air source heat pumps (ASHPs), including revised positions on roof plans.'

Objectors initially raised concerns with regard to fire safety.

273. The initial planning statement states that an outline fire strategy report sets out that the scheme complies with the functional requirement of the Building Regulations 2010 and further design development will be required in the next design stage. The details of these measures will be secured through the Building Control process. The London Fire Brigade (LFB) initially had no observations and no comments were received following re-consultation by the LPA in 2025.

## Archaeology

274. The applicant has submitted amended supporting archaeological documentation for the application in 2025. The applicant states that 'the full report was reviewed and updated to reflect technical changes to the scheme. Relevant planning policy and guidance were revised where appropriate, and a new search of the Greater London Historic Environment Record (GLHER) informed the updated assessment. The revised report also benefited from access to recent geotechnical investigations and more detailed structural information. In light of this updated scheme information, the site was assessed as having slightly lower archaeological potential than previously concluded, representing a reduced level of risk. The recommended mitigation measures were therefore refined to reflect this improved understanding.'

275. The previous officer report states that 'groundworks are proposed within an Archaeological Priority Zone and an archaeology assessment was reviewed by the council's archaeology officer. The proposed development would be acceptable subject to conditions relating to monitoring of initial site investigation work, a programme of archaeological evaluation and any subsequent mitigation works, design of foundations and an archaeological report.' Following re-consultation in 2025 our Archaeologist advised that should we be minded to grant consent for this application the following conditions are recommended to be applied to any consent: Archaeological Evaluation, Archaeological Mitigation and Archaeological Reporting.

276. Our archaeologist also advise that we need to seek section 106 planning

obligations to support Southwark council's effective monitoring of archaeological matters. A contribution of £8,635 is needed for Southwark's archaeology service in accordance with our 'S106 Planning Obligations and CIL' SPD. This would be secured in a S106 legal agreement.

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

277. Southwark Plan policy P56 protection of amenity states that planning permission will not be granted where it would cause unacceptable loss of amenity, including disturbance from noise, to present and future occupiers in the surrounding area or on the application site. Policy P14 design quality of the Southwark Plan requires development to be of a high standard of design with adequate daylight, sunlight and outlook for new and existing occupiers

278. Following re-consultation by the local planning authority objectors raised the following concerns to alleged breaches to:

- 'London Plan Policy D3 (Optimising Site Capacity): Development should respond to local character and design quality. The proposal's impact on existing residents' amenity and quality of life has not been properly assessed;
- Southwark Plan Policy P5 (Social Rented Homes): While supporting social housing provision, this policy requires that new development should contribute positively to local communities. The loss of recreational space and *inadequate community consultation process* contradicts this requirement. Objectors also state 'the reduction in outdoor recreational facilities represents a material loss of community amenity that has not been properly weighed against housing benefits by either Leathermarket CBS or the Council's assessment; and
- Southwark Plan Policy P13 (Design of Places): Development should respect and enhance local character and provide good quality living environments. The failure to properly assess impacts on existing residents' living conditions violates this policy.'

#### **Land use and amenity**

279. The proposed residential use and associated child play space would be acceptable in principle given its location within the estate.

280. The proposed replacement MUGA would be acceptable subject to a pre-occupation condition for an operational management plan.

#### **Privacy and overlooking**

281. Following re-consultation by the local planning authority objectors raised concerns that the development would have 'Adverse Impacts ... Privacy' and state 'concerns regarding loss of privacy and mutual overlooking due to the new building's proximity and increased footway traffic. This is a direct challenge to Southwark Plan Policy P56 (Protection of amenity), which prohibits development

causing loss of amenity, including privacy. The proposed privacy screens and obscure glazing should be robustly assessed for their long-term effectiveness.'

282. The Residential Design Standards SPD contains guidance stating that:

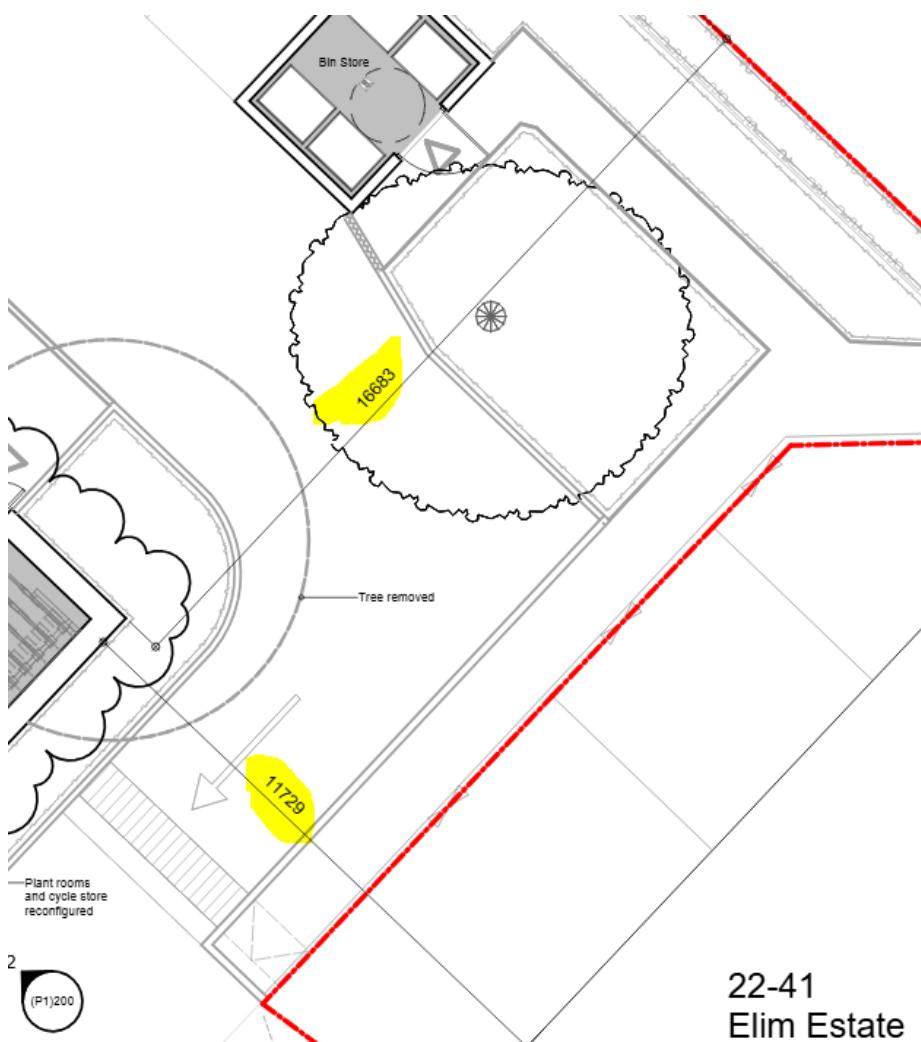
To prevent unnecessary problems of overlooking, loss of privacy and disturbance, development should achieve the following distances:

- A minimum distance of 12 metres at the front of the building and any elevation that fronts onto a highway
- A minimum distance of 21 metres at the rear of the building. Where these minimum distances cannot be met, applicants must provide justification through the design and access statement.

#### Site 1

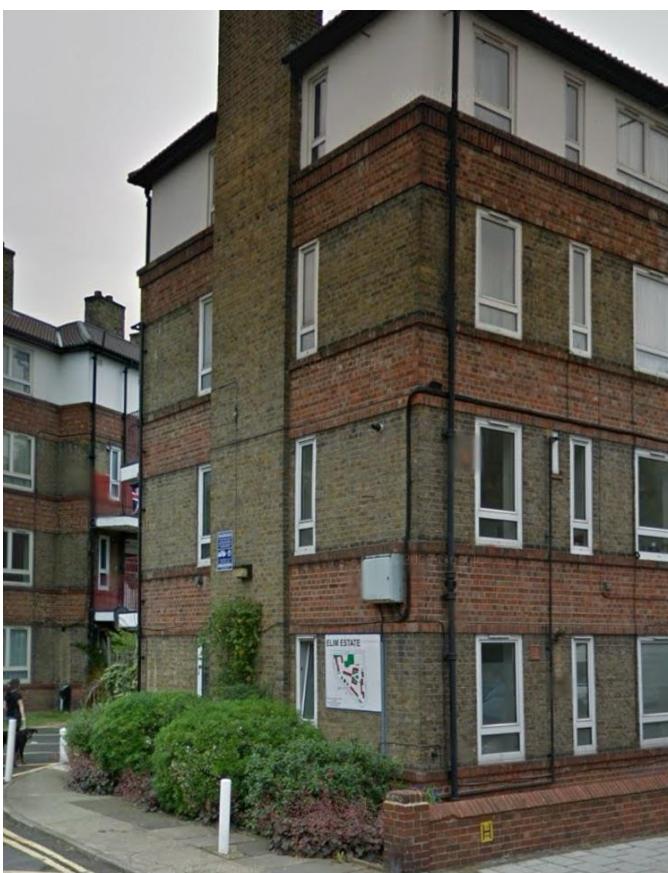
283. The rear elevation that would face 42-72 and 22-41 Elim Estate would offer limited views as a large section of the façade would comprise communal corridors and internal stairs. The remainder of the façade would pre-dominantly comprise kitchen and bedroom windows and balconies at first, second, third and fourth floors on the eastern corner. The rear elevation of the fifth floor would have no openings. The distance between the balconies on the eastern corner and 22-41 Elim Estate would be 11.7m and 16.6m to 42-72 Elim Estate.

Image – distances from neighbouring buildings



284. The closest neighbouring property is No. 134 Weston Street to the northwest of the site and comprises a contemporary mixed use part three, part four storey building with a lightweight top floor comprising a roof terrace and large glass windows and doors. It is recommended that permission is subject to a condition of details of glazed screening 1.8m above the finished floor of the north facing balconies of the proposed development to prevent overlooking to No. 134 Weston Street.
285. The distance between the proposed balconies on the front / southern corner of the proposed building and 1-21 Elim Estate would be 9.65m but no significant overlooking would occur as the proposed balconies would face eight small windows, which appear to not be the main window to a room as there are a number of larger windows along the western elevation of 1-21 Elim Estate.

Image – 8 windows



## Site 2

- 286. Objectors initially raised concerns that the proposed development would lead to a loss of privacy as residents on the opposite side of Long Lane would be overlooked and that the development would lead to an increase in footway traffic causing privacy issues for ground floor flats and homes in the area.
- 287. The layout of the proposed building, with ground to fourth bedroom and kitchen windows facing the street and living and dining areas facing the rear of the site, and the top floor bedroom with side facing windows, would not lead to significant overlooking to neighbouring properties. Furthermore, the proposed building would follow the front building line of the street and would have the same relationship with properties on the other side of Long Lane as its adjoining neighbours and would be acceptable as it would not be detrimental to the amenity of neighbouring properties.
- 288. The gardens of the proposed ground floor flats would either have 1100mm high metal railing fence or an 1100mm high brick wall with a 400mm high metal railing above. The eastern façade of number 202-204 Long Lane does not have habitable rooms on the ground floor overlooking the site and the proposed fence height would be acceptable.
- 289. The rear balconies on the upper floors would be 15.8m from 22-82 Elim Estate. The end panel of the balconies on the eastern elevation would have screens in excess of 1.7m above the finished floor level and this would ensure that neighbouring properties would not be overlooked.

## Noise and vibration

290. The applicant has submitted an Environmental Noise and Impact Assessment as part of the amended supporting documentation for the application. The applicant states that 'the Noise Assessment for the Elim Estate development has been revised for two key reasons:

- To align with updates to the risk of overheating methodology, which is now led by Building Regulations Part O. This includes assessment of intrusive noise levels in bedrooms during nighttime, evaluating the potential for natural ventilation without compromising occupant's sleep.
- To incorporate updated on-site noise measurements taken in January 2025.

291. The applicant states that 'the results of the assessment indicate that with appropriate mitigation in the form of suitably specified glazing and ventilation, internal noise levels within the proposed development dwellings will be acceptable.'

292. Following re-consultation by the local planning authority objectors raised concerns that the development would lead to 'significant Noise Pollution Impacts on Existing and Future Residents.'

#### Site 1

293. Planning officers consider that the proposed residential building would not create undue noise to surrounding properties and it is recommended that permission be granted subject to a construction management plan condition to deal with noise and vibration during construction.

294. The council's environmental protection team also recommended that permission be granted subject to a condition relating to sound level from any plant and associated ducting to ensure that the amenity of neighbouring properties would not be affected. The proposed plans initially only showed indicative areas for air source heat pumps on the roof. Amended plans show additional air source heat pump (ASHP) added to the roof of Site 1 (previously omitted). Planning officers recommend that permission be subject to the above mentioned details of sound mitigation condition.

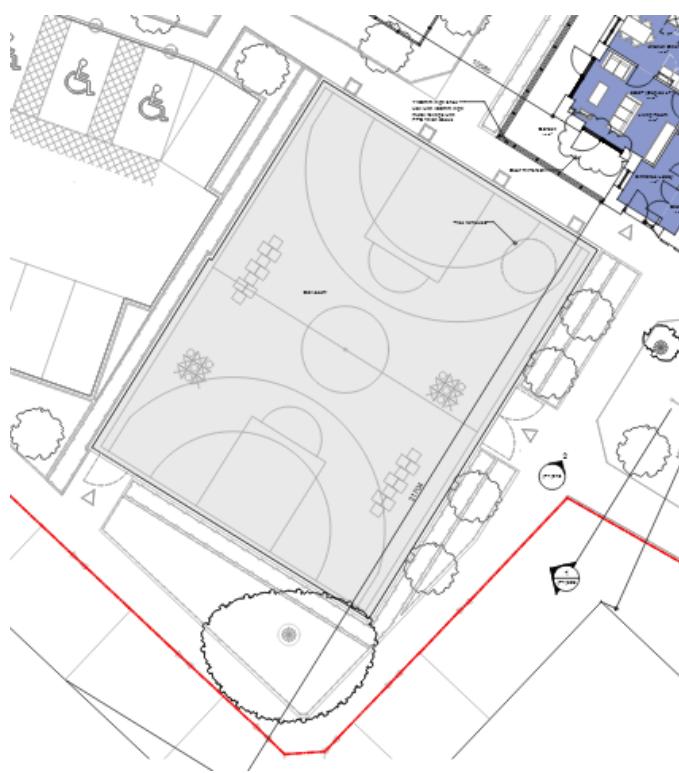
#### Site 2

295. Following re-consultation by the local planning authority objectors state 'the proposed new MUGA would be closer to existing flats within Elim Estate and the new flats on Site 2 than the current court. While the noise report suggests that predicted noise levels would be "similar to those resulting from the existing noise environment and not considered intrusive", concerns have been raised by objectors about noise nuisance, particularly given the proximity. This raises questions about the adequacy of mitigation measures and the potential for increased disturbance for residents. This is a crucial consideration under London Plan Policy D14 (Noise) and Southwark Plan Policy P66 (Reducing noise pollution and enhancing Soundscapes), both of which require development to avoid significant adverse noise impacts and mitigate any adverse effects on health and quality of life. The installation of a specialist sports fence is noted, but

its effectiveness in preventing disturbance needs rigorous scrutiny given the proximity to homes.'

296. Objectors also initially raised the above concerns as well as concerns regarding sound pollution during construction.
297. The proposed residential building would not create undue noise to surrounding properties and it is recommended that permission be granted subject to a construction management plan condition to deal with noise and vibration during construction.
298. The council's environmental protection team also recommended that permission be granted subject to a condition relating to sound level from any plant and associated ducting to ensure that the amenity of neighbouring properties would not be affected. The proposed plans only show indicative areas for air source heat pumps on the roof and as such the aforementioned condition would include details of the number, size and location of air source heat pumps.
299. The new MUGA (site 2) would be closer to flats within Elim estate and in close proximity to the new flats on site 2. The existing MUGA has no time restrictions. If the application is approved objectors would want the new MUGA to be subject to a condition to restrict opening hours. The applicant has agreed that noise from the ball court on site 2 be mitigated through a pre-occupation condition for an operational management plan. Such a condition would include consultation and agreement with Elim residents regarding the opening times of the ball court, and was approved as part of the 2023 decision and is included is now also included in the recommendation.

Image: new MUGA



300. The MUGA would have a specialist sports fence, Duo Sports from Zaun, 3m high to goal ends and 1.8m high to sides. The applicant advised that the Duo Sports product has been developed to overcome the rattle that can be a problem with ball court fencing. Every 200mm to the lower 1.2m high impact area ensures minimum movement between the panel and post with fixings. Furthermore, each fixing uses a synthetic EPDM insert to insulate the panel from the post and reduce noise by circa 29%. The applicant confirmed that the overall design has been developed with input from the secure by design advisor and state that part of making the sports court appealing to use is making it feel safe through good visibility on the court and to allow for passive surveillance across the court. For this reason the MUGA has been designed with mesh fencing and not walls. Planning officers consider this an appropriate design solution which would be expected to result in similar noise conditions post-construction to the existing conditions on site. Planning officers recommend that permission be granted subject to details of the proposed fencing to the MUGA.

### **Right to light**

301. Objectors raised concerns that the development would does not take into account that estate residents have a right to light. Right to light is a civil rather than a planning matter, the report has considered the amenity of the existing residential units in terms of daylight and sunlight.

### **Access and permeability**

302. Objectors raised concerns that the proposed ball court would restrict wheelchair access on this part of the estate (site 2). The proposed development would however not result in any wheelchair access restrictions on either of the sites.

### **External lighting**

303. It is recommended that permission be subject to condition requiring the submission of details of any lighting system to be installed. This would ensure that the council would 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.

## Transport

### Site layout

304. The footway adjoining these sites on Weston Street is wide and connects with Tabard Gardens at their proximate western side and, northerly across Long Lane joins with the nearby Leathermarket Street Community Park and Guy Street Park and eventually to London Bridge train/tube station and the riverside walk/riverboat service along River Thames. Albeit with narrow width, there is a north-south pedestrian walkway from the north-western side of these sites on Long Lane linking the two sites and the neighbouring communities together. These sites are also surrounded by various cycle routes in this locality including the Cycle Superhighway. There are few pedestrian safety measures in this vicinity demonstrated by a raised entry treatment at Weston Street/Long Lane junction and a zebra crossing at the western side of this intersection.

### Transport Statement

305. The applicant has submitted a Transport Statement as part of the amended supporting documentation for the application. The applicant states that 'the Transport Statement has been updated to reflect changes in local and national planning policy, incorporate the most recent baseline data, and provide context for the continued consideration of the live application following the Judicial Review. Key changes include:

Section 1.2 – updated to reflect the planning history, including the original submission, the resolution to grant, the outcome of the Judicial Review, and confirmation that the application remains live and under consideration by the Council;

Section 1.3 – updated to reference the revised NPPF and relevant policies in the New Southwark Plan;

Section 2.6 – bus service information revised to reflect current routes and frequencies;

Section 2.7 – PTAL ratings updated using the latest WebCAT data;

Section 2.9 – refreshed information on local schools and colleges;

Section 2.10 – inclusion of 2021 Census data to inform transport context;

Table 5.1 – parking standards updated in line with the New Southwark Plan;

Section 6.3 – new section added to incorporate the Construction Management

Plan;

Section 7 – conclusions updated to reflect the above changes.

306. Our Transport Policy Team advised in 2025 that A Transport Statement (TS) has been submitted in support of the revised application. The TS follows the same scope and methodology as the TS which accompanied the previous consented application. Planning officers have no further comments in this regard as it is considered that the updated TA provides sufficient information to make an informed assessment of the proposed development.

### Travel Plan

307. The applicant has submitted a Travel Plan as part of the amended supporting documentation for the application. The applicant states that 'the Travel Plan has been reviewed and updated to align with current transport policy, reflect recent changes to local transport conditions, and ensure consistency with the updated Transport Statement. It supports the live planning application by providing refreshed data and clarifying key measures to promote sustainable travel. Key updates include:

- Section 1.1 – parking information revised to reflect the updated PTAL rating and current New Southwark Plan standards
- Section 2.2 – updated to reference the latest policy guidance on sustainable travel
- Section 2.3 – NPPF references updated to reflect the December 2024 revision
- Section 2.5 – relevant policies from the New Southwark Plan are now clearly set out
- Section 3.4 – bus service information updated to reflect current routes and frequencies
- Section 5.2 – travel targets amended, with revisions to Table 5.2
- Section 6.1.1 – additional detail provided in the third paragraph on cycling infrastructure
- Section 8, paragraph c – expanded information on cycle parking provision and arrangements.

Our Transport Policy Team advised in 2025 that a Full Travel Plan should be secured by condition.

### Servicing, deliveries and refuse storage

308. The applicant has submitted a Delivery and Servicing Plan as part of the amended supporting documentation for the application. The applicant states that 'The Delivery and Servicing Plan has been updated to reflect recent changes to national, regional, and local policy, ensuring alignment with current best practice for managing delivery and servicing activity in residential developments. These updates maintain consistency with the technical documents supporting the live application. Key updates include:

309. Section 2 – revised to reference the updated National Planning Policy Framework

(December 2024), the Mayor's Transport Strategy (2018 – Revised November 2022), and the New Southwark Plan (2022). These policy references confirm the need to manage servicing activity in a way that reduces transport impacts and supports more sustainable, efficient movement of goods, in line with the London Plan's Healthy Streets and freight policies.'

310. Policy P50 of the Southwark Plan sets out that development must ensure safe and efficient delivery and servicing that minimises the number of motor vehicle journeys. This is also reiterated in London Plan policy T7.
311. Our Transport Policy Team advised in 2025 that the proposed external layout of the development is as per the consented scheme, as is the car parking and delivery and servicing arrangements. On this basis, these are acceptable in principle. Our Transport Policy Team recommend that a Detailed Delivery and Servicing Management Plan should be secured by condition.

### **Site 1**

312. Refuse bin collection would take place within this estate's internal courtyard and a second access (Pardoner Street) would be created off Weston Street. Refuse operatives would collect bins from waste stores within 10 metres of the refuse collection vehicle.
313. The Swept Path Analysis for a refuse vehicle on Pardoner Street shows the vehicle overhanging the landscaped area at the northern access. The applicant confirmed that the boundary treatment on the northern side of the northern access (the new road) would be a low growing plant species that would not exceed 300mm in height. It would also not be woody in nature as to prevent damage to the vehicle. An example species is *Ophiopogon planiscapus* 'Nigrescens', which is a low growing grass.

Image: Site 1 proposed bin stores



### Site 2

314. The servicing and refuse bin collection would take place within this estate's internal courtyard and service vehicles accessing the internal car park from Elim Street would be able to enter and exit in forward gear. Swept path plans show that a 10.7m refuse vehicle would be able to turn on-site. It is noted that service/delivery vehicles are typically much smaller (6.5m in length for a 3.5t vehicle such a Sainsbury's food delivery van) and would also be accommodated within the turning area provided

315. Refuse bin collection would also take place from Long Lane. A new dropped kerb would be created and the drag distance for the refuse bins would be 7m. This would be well below the maximum drag distance requirement of 10m.

### Image - Site 2 proposed bin stores

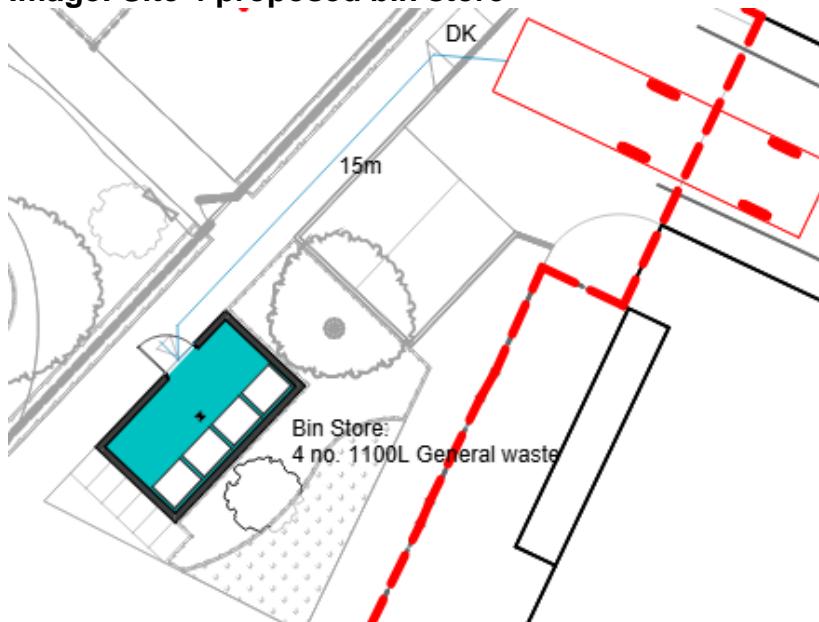


### Site 4

316. The existing bin store is used by approximately 60 flats and the distance from the common entrance of the residential block to the existing bin store is 42 meters. In this case the distance would remain the same because the positioning of the entrance to the upgraded bin store is in a better access location for residents. Policy P50 of the Southwark Plan stipulates that development should ensure safe and efficient delivery and servicing and the council's Waste Management Team advised that drag distances for all refuse bins should not exceed 10m. The proximity of the new bin store to the carriage way, which is currently used by the refuse truck, would reduce the drag distance from 12.5m to 12m. The council's waste team comments advised that a turning head be

provided as part of this proposal and that this could be achieved by removing four existing car parking spaces. The applicant however advised that this would not be possible as the existing four parking spaces north of the bin store have been used by existing residents for more than 12 years and forms part of the 35 established car parking spaces on the estate.

**Image: Site 4 proposed bin store**



317. The supplementary delivery vehicle movements, from the proposed development would not have any noticeable adverse impact on the existing vehicular movements on the adjoining roads. It is considered any additional uplift in waste and recycling is not expected to be high and therefore, can be easily accommodated within the existing refuse and recycling collection route. Details of refuse storage are to be secured by condition.

### New Road

318. Objectors initially raised concerns to the building a 5th road entrance (to site 1) into a 134 unit estate which does not want or need it and which endangers all users of the site and Weston Street itself, whether on foot or bicycle.

319. The council's highways team did not raise any concerns in 2023 to the principle of the development but did state that the creation of a new one-way through road within this estate's internal courtyard beside Site 1 is unacceptable. This was despite the applicant submitting a 2m x 2m pedestrian inter-visibility splays at the exit from Pardoner Street to Weston Street and agreed that the transport team agreeing that there would be no obstruction to visibility above 600mm within this zone. The addendum to the 2023 officer committee report stated that:

- The council's waste management team and highways team however did not raise any concerns in this regard and officers consider that on balance the new one-way through road would be in improvement to the current turning head on site 1 used by refuse collection vehicles.
- 'Transport officers have concluded that subject to a satisfactory Road Safety

Audit being undertaken and raising no concerns or issues on the proposed new vehicle access and one-way access route through the site which allows for refuse vehicle access to bin stores and to retain access to the proposed parking spaces associated with the established housing site, the proposal may be acceptable.' The 2023 decision included the above condition.

320. Our Transport Policy Team confirmed in 2025 that a stage 1 Road Safety Audit (RSA) of the newly proposed access (extension of Pardoner Street) should form part of the s278 process and be secured by condition.

### Trip generation

321. Objectors raised concerns that the development would result in an increase in traffic.

322. The supplementary vehicular traffic from the proposed development would not be significant and would not have any noticeable adverse impact on the existing vehicular movements on the adjoining roads.

### Car parking

323. Objectors raised concerns that the parking provision would be inadequate, no car club scheme has been proposed, no electric vehicle charging points would be provided, the development would lead to an increase in traffic and would lead to the loss of estate parking space which would create parking problems for the Elim residents

324. The site has a PTAL of 6a/6b. The London Plan policy calls for 'car free' bar limited Blue Badge spaces in inner Southwark.

325. On the existing estate currently there are three car parks. The central car park adjacent to site 2 contains 21 spaces, the car park adjacent to site 1 contains 9 spaces and the southernmost car park on site 6 contains 5 spaces. It is proposed to re-provide 35 formal spaces that are currently existing on the estate. In addition to these 35 spaces, the 3 additional blue badge parking spaces are proposed. The proposal also includes formalising 2 "informal" parking spaces on site 4 that have been parked on by existing residents with parking permits for more than 10 years. The bin store at site 6 is redundant and not used and its removal would facilitate the re-provision of two existing car parking spaces on site 2 that would be displaced by the re-provision of the MUGA / ballcourt. The proposed parking provision would therefore be adequate and as the number of off-street car parking spaces would only increase from 35 to 38 any increase in traffic would be insignificant.

326. The application sites are located within a controlled parking zone. To accord with London Plan policy, and to reflect the vast majority of other recent residential permissions in similar areas of the borough, it is recommended that any new residents should not be able to own a car and be excluded from obtaining onstreet parking permits. This would be secured in the legal agreement.

327. The Swept Path Analysis drawings for each of the car park areas show that there is sufficient space for vehicles to reverse in or out of spaces with a 6m clearance

or gap between rows of parking.

- 328. The 3 new wheelchair spaces would have electric vehicle charging points.
- 329. Our Transport Policy Team advised in 2025 that the proposed external layout of the development is as per the consented scheme, as is the car parking arrangements. On this basis, these are acceptable in principle.
- 330. Our Transport Team sought clarification with regard to where blue badge spaces are located in relation to the proposed accessible units. All 3 blue badge spaces would be on site 2 and would be located in close proximity to the entrance to the new building with three proposed accessible units.
- 331. In 2025 our Transport Team reviewed swept path plans for the proposed car parking and found it to be acceptable.

### Cycle parking and cycling facilities

- 332. Objectors raised concerns that no cycle parking would be provided and that active travel is not encouraged.
- 333. In terms of cycle parking, London Plan policy T5 sets out the minimum cycle parking standards for new residential development. 46 long-stay and short-stay cycle parking spaces on site 1 and 52 long-stay and four short-stay cycle parking spaces have been provided on site 2, which aligns with the minimum quantity standard in the London plan Policy T5..
- 334. Policy P53 of the Southwark Plan also sets out that development should provide cycle parking that is secure, weatherproof, conveniently located, well-lit and accessible. Both development sites provide internal cycle stores within the building and at ground floor level, details of which would be secured by condition. Our Transport Policy Team advised in 2025 that the proposed cycle stores have been relocated in comparison with the consented scheme. Cycle parking is however proposed in accordance with adopted Southwark Plan (2022) standards, which is welcomed. It is however not clear whether a minimum of 5% of all spaces can accommodate larger/non-standard cycles, and whether a minimum further 20% are in standard Sheffield stand form. The Transport team advised that any remaining cycle parking must be in the form of two-tier racks only and advise that an annotated plan illustrating dimensions of the cycle stores (including clearances between stands, aisle widths etc). Given the limited changes in comparison with the previous scheme, and compliance with the higher Southwark Plan standards, the specifics around stand types and proportions can be dealt with by condition in this instance.
- 335. Transport for London recommends free Santander Cycles membership for each initial household for a minimum of 2 years and that the protection of cyclists on LCN22 during construction should be ensured via a construction logistics plan.

### Transport Infrastructure

- 336. Objectors raised concerns that the development would provide inadequate public transport provisions.

337. Planning officers considered in the 2022 officer report that the proposed development would not have any noticeable adverse impact on the existing public transport infrastructure. Our Transport Policy Team advised in 2025 that given the scale of development, the proposals would not be expected to result in a material impact on local transport and highways networks.

## Highways works

338. The applicant would need to enter into a section 278 agreement to undertake the highway works such as:

- Repave the footway including new kerbing fronting the development on Weston Street and Long Lane in accordance with the Southwark Streetscape Design Manual (SSDM) standards - precast concrete paving slabs and with 150mm wide granite kerbs
- Construct new vehicular entrance at Weston Street in accordance with the SSDM standards
- Reconstruct existing vehicle exit at Weston Street in accordance with the SSDM standards
- Upgrade street lighting to current LBS standards (including on private roads). Please contact Perry Hazell at [Perry.Hazell@southwark.gov.uk](mailto:Perry.Hazell@southwark.gov.uk) for further details
- Review existing and proposed signage fronting the development and investigate the possibility to install any existing / proposed signs on the building walls in order to improve effective footway widths
- Refresh road markings following kerb installation
- Detailed drawings should be submitted as part of the s278 application confirming that surface water from private areas would not flow onto public highway in accordance with Section 163 of the Highways Act 1980
- Rectify any damaged footways, kerbs, inspection covers and street furniture due to the construction of the development
- The creation of a raised entry treatment at Weston Street / Elim Street junction
- The upgrade of the zebra crossing on Long Lane to a raised zebra crossing.

339. It is recommended that permission be granted subject to these matters being included in the legal agreement.

340. The council's highways team advised that prior to works commencing on site, including any demolition, a joint survey should be arranged with the highways team to catalogue condition of streets and drainage gullies. Informative about this, the need to design to SSDM standards, and the section 278 agreement would be included on any permission.

## Environmental matters

### Construction management

341. The applicant has submitted a construction management plan as part of the

amended supporting documentation for the application. The applicant states that 'the Construction Management Plan has been updated to reflect changes in policy, site context, and the construction programme. These updates ensure consistency with the supporting documents submitted as part of the live application. Key updates include:

- Section 1.3 – parking information updated to reflect the revised PTAL rating and current New Southwark Plan standards
- Section 2.1 – policy references updated to include the revised National Planning Policy Framework (December 2024), the Mayor's Transport Strategy (2018 – Revised November 2022), Transport for London Construction Logistics Plan Guidance, and the New Southwark Plan (2022)
- Section 2.3 – bus service information updated to reflect current routes and frequencies, and the paragraph following Figure 2.4 provides additional detail on local cycle routes
- Section 2.4 – local schools, colleges, and community facilities updated to reflect the current context
- Section 3.1 – construction programme revised to reflect the current phasing and timeline;
- Section 6.2 – tables and graphs updated to align with the amended construction programme.'

342. Planning officers consider that the issues raised by TfL in their 2025 comments with regards construction can be dealt with by an Construction and Environmental Management Plan condition.

### Land contamination

343. The ground investigation and contamination risk assessments for the Elim Estate have been updated through a series of January 2024 reports covering Sites 1, 2, and 4–6. These replace earlier assessments and incorporate new laboratory testing, refined risk assessments, and detailed remediation strategies.

Key updates in the January 2024 reports:

- Updated client name to Leathermarket Community Housing
- Expanded chemical analysis was undertaken across all sites.
- Identification of asbestos across several of the sites
- New leachate testing at Site 2 indicating potential risk to underlying aquifers from Lead, with specific mitigation measures recommended
- Ground gas risk reassessed and further monitoring recommended
- Introduction of detailed remediation measures across the sites,
- Notwithstanding this, the core development proposals remain unchanged
- Safe redevelopment of all sites remains achievable with the recommended site-specific remediation strategies
- No changes to the general development footprint or foundation strategy from previous assessments
- All updates continue to support environmental protection and construction health and safety compliance.'

344. Following re-consultation in 2025 no further comments have been received from our Environmental Protection Team.

### Air quality

345. Policy P65 of the Southwark Plan sets out that development must achieve or exceed air quality neutral standards and address the impacts of poor air quality on building occupiers and public realm users by reducing exposure to and mitigating the effects of poor air quality. This is also reiterated in London Plan policy SI1 which sets out that development proposals should minimise increased exposure to existing poor air quality.

346. The applicant has submitted an Air Quality Assessment as part of the amended supporting documentation for the application. The Air Quality Assessment for the Elim Estate has been updated to reflect changes in policy, guidance, and technical inputs since the original assessment.

Key updates in the revised assessment:

- Updated legislative and policy context to reflect:
  - Adoption of the Southwark Plan 2022
  - Amendments to the Air Quality Standards Regulations (2010)
  - Release of the updated Air Quality Strategy
  - Adoption of the Environmental Improvement Plan 2023
  - Updates to the National Planning Policy Framework
- Updated Construction Dust Assessment to align with the Institute of Air Quality Management's Guidance on the Assessment of Dust from Demolition and Construction V2.2
- Introduction of an interim target for particulate matter with an aerodynamic diameter of less than 2.5µm (PM2.5)
- Updated Air Quality Neutral Assessment in line with the latest technical guidance
- Revisions to the air quality modelling to reflect:
  - Updated local monitoring results
  - Updated background pollutant concentrations
  - Release of the updated Emissions Factor Toolkit by DEFRA
  - Release of the updated NOx to NO2 Calculator by DEFRA

347. Following re-consultation by the local planning authority objectors raised concerns with regard 'Air Quality ... and Public Health' and state 'the Air Quality Assessment itself indicates that transport emissions from the proposed development exceeded the relevant benchmarks for Nitrogen Oxides (NOx) and Particulate Matter (PM10), even though overall the development was deemed "air quality neutral". While the scheme aims to reduce air pollution by encouraging walking and cycling, and using electric heating, the admitted exceedance in transport emissions is a critical concern for local air quality. This calls into question full compliance with London Plan Policy SI1 (Improving Air Quality) and Southwark Plan Policy P65 (Improving Air Quality), which mandate achieving or exceeding air quality neutral standards and reducing exposure to poor air quality. Residents' health, particularly in an already designated Air Quality Management

Area (AQMA), must be prioritised.'

348. Objectors also initially raised concerns that the development would impact air quality.
349. The environmental air quality assessment shows that the predicted air pollutants are likely to exceed the National Standards. Mitigation measures are therefore required and it is recommended that permission be granted subject to a condition relating to internal ventilation to ensure that that the ventilation, ducting, filtration/treatment and ancillary equipment is incorporated as an integral part of the development in the interests of residential amenity. Potential air pollution associated with construction works would also be covered by a construction management plan condition.
350. Following re-consultation in 2025 no further comments have been received from our Environmental Protection Team.

## **Energy and sustainability**

351. The applicant has submitted an Energy Statement as part of the amended supporting documentation for the application. The applicant states that 'the Energy Statement has been updated to reflect revised technical inputs and assessment methodology. Specifically:

### Be Lean

- Energy demand calculations have been revised using SAP 10.2 assumptions
- Updated building envelope U-values are provided based on revised architectural inputs
- The overheating assessment (Appendix C) has been updated to reflect compliance with the updated TM59 methodology, using SAP 10.2 climate files.

### Be Clean

- Updates have been made to reflect the status of nearby district heat networks, based on the latest available GLA mapping.

### Be Green

- Updated PV technical specifications are provided, including array size, peak output, and total system yield
- These changes reflect technical design changes and updated assessment methodology, for use in conjunction with the documentation supporting the current live application.'

352. The applicant has submitted a Sustainability Statement as part of the amended supporting documentation for the application. The applicant states that 'The Sustainability Statement has been updated with minor text revisions across several topic areas to reflect recent technical design changes and assessment methodology. Specifically:

- Minor updates reflecting changes to landform and layout
- Minor revisions to operational waste content
- Light text changes on surface water and flood risk
- Minor edits to noise section
- Brief wording updates to air quality content
- Minor revisions to overheating section in line with updated methodology
- Minor updates to supporting figures in line with the overall technical design updates, covering: urban greening, inclusive design, open space and amenity, physical activity, energy and carbon emissions, water use (including fittings specification), biodiversity, and alternative modes of transport.'

353. Following re-consultation our Planning Policy Team advised that 'the application has been resubmitted and must now comply with Part L 2021 requirements. This means all carbon emissions calculations must be based on SAP 10.2. While the applicant has included previous figures using SAP 10 for reference, they have not provided updated carbon emissions reductions for the Be Lean, Be Clean, and Be Green stages using SAP 10.2. These updated figures are essential for assessing the revised Energy Statement and must be included in the energy statement.

354. The tables on page 6 showing Regulated CO<sub>2</sub> Savings at the Be Green stage and the Cumulative Savings currently reference SAP 10. The applicant must confirm that SAP 10.2 has been used throughout to calculate both the carbon emissions baseline and the emissions reductions, in line with Part L 2021 requirements.

355. The applicant must provide baseline carbon emissions using SAP 10.2 in line with Part L 2021. This should be submitted through the completed GLA Carbon Emissions Reporting Spreadsheet, which is used to calculate emissions reductions across the energy hierarchy.

356. Carbon offset payment:  
The carbon offset payment, as set out in the energy statement is 10.99 tCO<sub>2</sub>/yr x 30 yrs x 95£/tCO<sub>2</sub> = £31,321.5

357. Be Lean  
The applicant is asked to provide further details on the passive design measures included in the proposal. Specifically, have they considered strategies such as optimising building orientation and site layout, incorporating natural ventilation and daylighting, using thermal mass, and applying solar shading? Additionally, please confirm whether these measures are outlined in the Design and Access Statement. The applicant must provide the full SAP worksheets for the DER/TER calculations at all three stages: Be Lean, Be Clean, and Be Green.

358. Be Clean  
The applicant has stated that a communal heat network is not being provided, citing limited space for a plant room, a small number of households to share capital costs, and low overall heat demand, which they argue makes a centralised system inefficient. However, as the site is located near a proposed heat network, the applicant must provide further justification for why a futureproofed connection is not feasible. This should include more detailed

evidence supporting the claims around capital costs, space constraints, and inefficiency.

359. **Be Green**

The site is located within a Heat Network Priority Area (HNPA) and is in close proximity to a proposed heat network. As per GLA guidance, individual heating systems are not compatible with District Heat Networks and are therefore not policy compliant in HNPAs. To comply with London Plan Policy SI 3, the development must include a communal low-temperature heating system and select a heat source in accordance with the heating hierarchy. The applicant must provide a clear justification for not futureproofing the development for connection to the nearby proposed heat network, including detailed evidence on space constraints, capital costs, and heat demand.

360. **Heat pumps**

The applicant must confirm how many Air Source Heat Pumps (ASHPs) are proposed on site. While the report states that the system involves individual ASHPs located externally grouped at roof level and connected to internal hot water cylinders, it is unclear to officers whether the system is centralised or fully individual. The applicant should clarify the system being used (including number of ASHPs and the overall efficiency of the system) and explain how heat demand will be metered at the individual unit level.

361. **Overheating**

The applicant is proposing MVHR (Mechanical Ventilation with Heat Recovery) to manage overheating where necessary. To support this approach, the applicant must outline what passive shading measures have been implemented on-site to reduce reliance on active cooling systems. The applicant must provide full details of the proposed active cooling plant, including system efficiencies and whether it can utilise free cooling or renewable cooling sources.

362. **EUI and SHD**

The applicant has provided EUI and SHD values of 69.18 kWh/m<sup>2</sup>/yr and 14.97 kWh/m<sup>2</sup>/yr respectively. Please provide justification for the difference between these figures and clarify how each has been calculated.

363. **Be Seen**

Can the applicant please:

- Upload the necessary contextual and performance data to the 'be seen' portal
- Confirm the target dates for all subsequent 'be seen' stages
- Confirm that metering plans that will enable the in-use energy performance reporting are in place.

364. • These are the obligations to secure - this is what standard wording needs to be applied.

- Carbon offset: £31,321.5
- Agreed carbon target (cumulative figure): 10.99 tCO<sub>2</sub>/yr / 70.5 % reduction against Part L 2021
- Be Seen
- Energy review mechanisms

365. The applicant submitted the following to the local planning authority for further review by the Planning Policy Team:

- Document with the queries and answers (I've also put these responses in blue in the email below)
- SAP outputs for both sites (Be Lean and Be Green)
- Updated Energy Report
- Be Seen spreadsheet
- GLA Carbon Emission Reporting spreadsheet.

366. Our Planning Policy have reviewed the above in 2025 and advised that there are no further actions required.

### Overheating

367. The applicant has submitted an overheating risk assessment as part of the amended supporting documentation for the application. The applicant states 'due to regulatory changes introduced through Approved Document Part O, a new Overheating Risk Assessment has been prepared in accordance with the updated methodology. The assessment uses dynamic thermal modelling.'

368. Following re-consultation in 2025 no further comments have been received from our Environmental Protection Team.

### **Planning obligations (S.106 agreement)**

369. IP Policy 3 of the Southwark Plan and Policy DF1 of the London Plan advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. IP Policy 3 of the Southwark Plan is reinforced by the Section 106 Planning Obligations SPD 2015, which sets out in detail the type of development that qualifies for planning obligations. The NPPF emphasises the Community Infrastructure Levy Regulation 122 which requires obligations be:

- Necessary to make the development acceptable in planning terms
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development.

370. Following the adoption of Southwark's Community Infrastructure Levy (SCIL) on 1 April 2015, much of the historical toolkit obligations such as Education and Strategic Transport have been replaced by SCIL. Only defined site specific mitigation that meets the tests in Regulation 122 can be given weight.

371. The contribution of the carbon offset fund increased from the 2023 amount of £21,390 to £31,321.50 and the Total financial contributions increased from £120,115 to £130,046.50.

372.	Planning Obligation	Mitigation	Applicant Position
Affordable housing	100% social rent	Agreed	
Site 1 Outdoor amenity space	£22,700	Agreed	
Site 2 Outdoor amenity space	£23,540	Agreed	
Site 2 MUGA	To be built before the existing ball court is closed for the works	Agreed	
Tree loss	CAVAT payment of £52,485 to plant trees in Chaucer ward	Agreed	
Carbon offset fund	£31,321.50	Agreed	
Energy performance	<p>Monitor, verify and report to demonstrate agreed carbon savings on site</p> <p>Agreed carbon target (cumulative figure): 10.99 tCO2/yr / 71.12 % reduction against Part L 2021</p> <ul style="list-style-type: none"> <li>- Be Seen</li> <li>- Energy review mechanisms</li> </ul>	Agreed	
Adopt pavement	Widen footway on Long Lane; Council to adopt the additional strip beyond planters/outward-opening doors	Agreed	
Parking permits	Development excluded from eligibility for CPZ permits	Agreed	
Cycles membership	Free membership for each initial household for a minimum of 2 years	Agreed	
Monitoring of archaeological matters	£8,635	Agreed	
Highway works	Comprising:	Agreed	
	Repave the footway including new kerbing fronting the development on Weston Street and Long Lane in accordance with the Southwark Streetscape Design Manual (SSDM) standards - precast concrete paving slabs and		

	with 150mm wide granite kerbs.
	Construct new vehicular entrance at Weston Street in accordance with the SSDM standards.
	Reconstruct existing vehicle exit at Weston Street in accordance with the SSDM standards.
	Upgrade street lighting to current LBS standards (including on private roads).
	Review existing and proposed signage fronting the development and investigate the possibility to install any existing / proposed signs on the building walls in order to improve effective footway widths.
	Refresh road markings following kerb installation.
	Detailed drawings should be submitted as part of the s278 application confirming that surface water from private areas would not flow onto public highway in accordance with Section 163 of the Highways Act 1980.
	Rectify any damaged footways, kerbs, inspection covers and street furniture due to the construction of the development.
	The creation of a raised entry treatment at Weston Street / Elim Street junction.
	The upgrade of the zebra crossing on Long Lane

	to a raised zebra crossing.	
Total financial contributions	£138,681.50	Agreed
Administration and monitoring fee (excluding affordable housing monitoring fee and servicing bond)	2% of total financial contributions	Agreed

373. In the event that an agreement has not been completed by 15 April 2026, the committee is asked to authorise the director of planning and growth to refuse permission, if appropriate, for the following reason:
374. In the absence of a signed S106 legal agreement there is no mechanism in place to mitigation against the adverse impacts of the development through contributions and it would therefore be contrary to IP Policy 3 Community infrastructure levy (CIL) and Section 106 planning obligations of the Southwark Plan 2022; and Policy DF1 Delivery of the Plan and Planning Obligations of the London Plan 2021; and the Southwark Section 106 Planning Obligations and Community Infrastructure Levy SPD 2015.

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

375. Section 143 of the Localism Act states that any financial contribution received as community infrastructure levy (CIL) is a material 'local financial consideration' in planning decisions. The requirement for payment of the Mayoral or Southwark CIL is therefore a material consideration. However, the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport invests in London as a whole, primarily Crossrail. Southwark's CIL will provide for infrastructure that supports growth in Southwark.
376. The site is located within Southwark CIL Zone 2 and MCIL2 Central London Zone. Based on the applicant's CIL Form1 (GIA) dated 16-May-22, the gross amount of CIL is approximately £1,314,021.64 (pre-relief). Subjecting to the correct CIL forms being submitted on time, CIL Social Housing Relief can be claimed for a number of types of affordable housing, and since all 34 units would be social rented, 100% of CIL relief is anticipated once the claimant's complete relief claim procedures. It should be noted that this is an estimate subject to change, and the floor areas will be checked when related CIL Assumption of Liability Form and Relief Claim Form are submitted, after planning approval has been obtained.

### **Other matters**

#### **Systematic failures in project management and accountability**

377. Following re-consultation by the local planning authority objectors raised

concerns with regards to systematic failures in project management and accountability. Objectors state 'this application represents the culmination of years of systemic mismanagement by Leathermarket Community Benefit Society as the council's development partner. Leathermarket CBS has expended well over £1 million of public funds whilst failing to deliver a legally compliant planning application. The persistence of fundamental legal defects after such substantial expenditure raises serious questions about the competence and accountability of both the development partner and the council's oversight mechanisms.

Southwark council's continued advancement of this legally defective proposal, despite clear identification of procedural breaches and policy violations, suggests an inappropriate prioritisation of development delivery over statutory compliance. This approach undermines public confidence in the planning system and disregards the legitimate rights and interests of existing residents. The council has a statutory duty to ensure that development partners operating on its behalf comply with all relevant legal requirements. The failure to halt this flawed process and require proper compliance represents a dereliction of the council's supervisory responsibilities and potentially exposes the authority to further legal challenge and financial liability. Leathermarket CBS's persistent inability to produce a legally compliant application despite substantial public investment demonstrates fundamental organisational deficiencies that should disqualify them from further public development contracts until proper governance structures are established.'

378. The role of the local planning authority is to assess planning applications and is not involved in project management of this scheme.

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

### Transport for London

Response to initial consultation:

379. The planning statement mentions a 'net gain' of car parking spaces. London Plan policy calls for 'car free' bar limited Blue Badge spaces in inner Southwark. I assume these spaces are for existing rehoused residents who already own cars. To accord with London Plan policy, and to reflect the vast majority of other recent residential permissions in similar areas of the borough I would recommend that any new residents should not be able to own a car (being excluded from obtaining on-street parking permits, secured in the s106 agreement) and that the car parking spaces for re-housed existing residents are repurposed to, for example play space/landscaping as and when these residents move out or sell their vehicle.
380. The cycle hire docking station looks to be unaffected by the development, and we would expect it to remain operational at all times during construction. If this is not the case, then TfL should be notified.
381. Southwark Plan policy calls for a free Santander Cycles membership for each initial household for a minimum of 2 years, though we support 3 years to match the arrangement for car club membership, so this should be secured in the s106 agreement.

382. Protection of cyclists on LCN22 during construction should be addressed via a construction logistics plan.

2025 re-consultation:

Cycle Parking:

383. 46 long-stay and short-stay cycle parking spaces on site 1 and 52 long-stay and four short-stay cycle parking spaces have been provided on site 2, which aligns with the minimum quantity standard in the London plan Policy T5. Policy T5 also requires cycle parking quality to meet the London Cycling Design Standards (LCDS).

Areas of non-compliance are provided below:

- Of the property, covered, fully accessible and managed. We do not consider that cycle parking is “well-located”. The cycle store for Site 2 is approx. 20-30m from the entrance to the building and in the corner of the site. We are concerned that, especially at night, this will not feel safe, contrary to the Healthy Streets indicator “people feel safe” in Policy T2. This would also discourage cycling, contrary to Policy T5. We recommend that cycle parking is accessed within the residential building or is located closer to the entrances in areas which feel safe.
- The LCDS requires a minimum of 1m (preferred 1.2m) between Sheffield stands. This has not been provided in the external store for the Sheffield stands and therefore will not accommodate four cycles. The store should be amended to meet LCDS requirements.
- We note that for Site 1, the spacing between Sheffield stands meets the minimum standards in the LCDS.
- Policy T5 B also requires that cycle parking space for wider/adapted cycles is provided. The LCDS requires this to be five per cent of the cycle parking provision. We note that four spaces with the required 1.8m spacing between stands has been provided. However, we request that one additional space is provided to meet LCDS requirements.
- Access to the cycle store for Site 1 is directly from the public realm. We are concerned about the personal safety of users. Cyclists could be tailgated into the store with no means of escape. We request that either access is directly from the residential building or a secondary access to the store is provided.
- Amendments to align with the LCDS are required prior to determination to align with London Plan policy.
- LCDS requires cycle parking to be secure, well-located (close to the entrance).

Car parking:

384. Policy T6.1 outlined in the London planning document residential developments in any PTAL 5-6 zone must be car free (excluding Blue Badge parking). We note the current proposal meets the requirements set in the London Plan. The proposed number of residential dwellings in the document is 34 units. It is required that for this development at least 10% of dwellings have Blue Badge parking. We note it is outlined in the transport statement that these parameters will be met with 3 Blue Badge parking spaces planned for.

385. The transport statement references 'Appendix A' for the location of Blue Badge parking spots. These however are not clearly shown, showing seven potential spaces. In line with Policy T2 we request a clearer plan so we can ensure the spaces meet road safety requirements.

386. Additionally in line with policy T6.1H disabled parking spots are to be located 'to minimise the distance between disabled persons parking bays and the dwelling or the relevant block entrance or lift core.' BSI states that all disabled parking should be within 50m of an accessible entrance.

387. We request a revised site plan that clearly show that these requirements are met. The Mayors Healthy Streets Policy T2 outlines that all new developments should aim to reduce road danger. We would like to highlight that all vehicles should be able to enter and exit parking in forward gear, reducing road danger brought on from reversing in closed spaces.

**Delivery & Servicing:**

388. A draft delivery and servicing plan (DSP) has been provided.

**Site 1:**

389. We note that vehicles will both enter and exit the site in forward gear which is in line with Policy T2. This allows for safe delivery and servicing for the site. We note that the proposed delivery and servicing route for Site 1 will take place onstreet, which is contrary to Policy T7, which requires servicing to take place offstreet. We recommend that all delivery and servicing should take place on site where possible.

**Site 2:**

390. We welcome that deliveries for Site 2 will take place on site. Additionally, we note that all delivery and service vehicles will be able to enter and exit in forward gear in line with Policy T2.

391. However, we are concerned that vehicles will block entry and exit for Blue Badge holder's vehicles when making deliveries, as shown in the swept path analysis.

392. We request that a designated servicing bay is created. This could be done through converting one of the existing car parking bays. This will ensure continued access to the disabled persons' spaces is maintained.

393. A full Delivery and Servicing Plan (DSP) should be secured through condition in line with Policy T7.

### Construction:

- 394. We have concerns that the proposed pit lane will cause disruptions to the bus route along Long Lane (Site 2). To ensure that vehicles can manoeuvre around the pit lane safely, we request that a swept path analysis for a 12-meter electric bus passing the pit lane is provided.
- 395. We note that while vehicles are loading, there will be footpath closures. Policy T7 requires that “during the construction phase of development, inclusive and safe access for people walking or cycling should be prioritised and maintained at all times”. It has not been demonstrated that safe pedestrian movement will be maintained; pedestrians will need to cross the carriageway to avoid the closure. Therefore, we request that a pedestrian gantry on the 2-way Long Lane (Site 2) highway is proposed. We also request that an additional stop works sign for the other side of the pit lane on Weston Street is provided, along with chapter 8 barriers on the pavement during deliveries.
- 396. We note that loading/unloading will occur on-site until the building footprint prohibits this. No information demonstrating whether vehicles can enter and exit in forward gear has been provided, which is contrary to the Mayor’s Vision Zero approach. We request a map showing where this will take place on site is provided prior to determination, or in a Construction Logistics Plan (CLP) secured through condition.
- 397. We understand that in school term time deliveries will take place only in off-peak hours (9:30am-2:30pm), which is in line with Policy T7. We request that network peak hours are avoided throughout the duration of construction.
- 398. We note there is no mention of cycle parking. To align with Policy T1 and encourage a Strategic Mode Shift, cycle parking for contractors should be provided from the outset. Not providing cycle parking at this point discourages cycling to the site, thus contrary to Policy T1. Cycle parking should be provided in line with the London Cycle Design Standards to align with Policy T5 and should be secure, covered, accessible and well-located, close to the site entrance on-site.
- 399. We note that ‘all vehicles and driver management practices to comply with the FORS (Bronze accreditation) and Construction Logistics and Community Safety (CLOCS).’ This is in line with TFL standards

### Travel Plan:

- 400. A full Travel Plan should be secured through condition to align with Policy T4.

### Environment Agency

#### Response to initial consultation:

- 401. No objection but advised that the applicant confirm Finished Floor Levels (FFLs) across the development as this will help inform any emergency plans and aid in identifying areas which may or may not inundate in a flood event.

2025 re-consultation:

402. No comments received.

Natural England

Initial consultation:

403. No comments received.

2025 re-consultation:

404. No comments received.

Thames Water

Initial consultation:

405. No comments received.

2025 re-consultation:

406. No comments received.

Greater London Authority

Initial consultation:

407. No comments received.

2025 re-consultation:

408. No comments received.

London Fire and Emergency Planning Authority

Response to initial consultation:

409. No observations.

2025 re-consultation:

410. No comments received.

Metropolitan Police

Response to initial consultation:

411. No objection as the proposal would not negatively impact the potential for crime and anti-social behaviour within the proposed development.

2025 re-consultation:

412. No comments received.

**Consultation responses from internal consultees**

Archaeology

Initial consultation:

413. The proposed development would be acceptable subject to conditions relating to monitoring of initial site investigation work, a programme of archaeological evaluation and any subsequent mitigation works, design of foundations and an archaeological report.

2025 re-consultation:

414. The previous officer report states that 'groundworks are proposed within an Archaeological Priority Zone and an archaeology assessment was reviewed by the council's archaeology officer. The proposed development would be acceptable subject to conditions relating to monitoring of initial site investigation work, a programme of archaeological evaluation and any subsequent mitigation works, design of foundations and an archaeological report.' Following re-consultation our Archaeologist advised that should we be minded to grant consent for this application the following conditions are recommended to be applied to any consent: Archaeological Evaluation, Archaeological Mitigation and Archaeological Reporting. We need to seek section 106 planning obligations to support Southwark Council's effective monitoring of archaeological matters. A contribution has to be calculated by the case officer for developments on the basis of the officer time which is needed to carryout the range of archaeological tasks which are required. It is up to the individual case officer to make sure that applicants make a calculated contribution for Southwark's archaeology service in accordance with our 'S106 Planning Obligations and CIL' SPD (page 19).

## Design and Conservation team

Initial consultation:

Site 1 Weston Street

- 415. Within the context of the Weston Street, Site #1 (garages) stands out as a gap in the townscape, with the low-rise garage blocks sat in space between the estate's linear 4-storey housing block (nos.1-21) and the converted 3-storey former Victorian pub and adjacent modern 4-storey townhouse with its pop-up pavilion roof extension (nos.132 and 134 Weston Road).
- 416. The proposal is for a part five/ six-storey apartment block that replaces the garages and infills the townscape gap. The new building broadly aligns with and is of similar length to the adjacent linear block (no.1-21), separated by the retained vehicle access point. A narrow front margin of land onto Weston Street provides amenity to the street-side ground floor and, if landscaped, would pick up on the character of the estate.
- 417. The new building has a wedged-shaped footprint that articulates rearward to run parallel with the central block (nos. 42-72). This brings a visual coherency and enclosure to the intervening open space, which is relandscaped with trees, margin planting and replacement parking. The building is set away from the neighbouring modern townhouse, with a new vehicle exit route set out in-between, which works well to preserve the outlook and amenity of the townhouse (DM to confirm).
- 418. The building is dual-fronted, with the communal lobby entered both from the street and rear/courtyard sides of the building. Separate entrances to two duplex units further activate the street elevation, which is welcome in terms of good urban design, albeit the detailed layout would benefit from some adjustment (see later).
- 419. The wedged shaped footprint will result in a bulkier building than the relatively narrow estate buildings. However, the footprint is a product of the site's geometry and will produce a building that has an engaging 'flat iron' profile, rising above the adjacent former pub as seen from the north along Weston Street. However, the eastern end of the building is less effective when combined with the additional height (see below).
- 420. The general height of the new building is five storeys (c.17m to parapet level) towards its western end. This exceeds the shoulder height of the adjacent former pub and townhouse (c.11.5m). It also exceeds the eaves height of the linear block (c.11m) and is above its roof ridge (c.13m). At this height, the additional storey will be evident against the backdrop of the Elim Estate, but will read sufficiently comfortable within the street scene, particularly given the taller, 5-storey Seal House of the Tabard Gardens Estate directly opposite (c.13.5m to eaves, c.17m to ridge).
- 421. The issue, however, is the part 6th floor, which adds excessive height and bulk to the building's eastern end. Despite the street trees, the additional scale would be evident (c.19.5m to roof), sitting slightly forward and above the linear block's

pitched roof (1-21) when viewed north-westwards along Weston Street. Furthermore, it would be especially prominent when viewed from within the entrance courtyard space formed between the linear block (1-21) and adjacent block (22-41). Given the relatively close proximity, the additional height and bulk of the wedge-end would appear overbearing and discordant. It would generate an overly dense feeling within this part of the estate. The part storey is harmful to the immediate townscape and character of the estate. This impact would need to be assessed against the benefits of the scheme, albeit the sixth floor could be removed and the penultimate floor replanned to match the lower floors, thereby maintaining unit numbers. Alternatively, larger flats would involve a modest reduction in unit numbers.

- 422. Regarding the detailed architecture, the elevations of the building will match the general simplicity of existing estate buildings and follow a similar aesthetic of horizontal bands of contrasting coloured brickwork, with windows set into alternating bands. Whilst the colours are switched, with a cream colour replacing the yellow stock, it picks up on the rendered top floor of the original blocks. The balconies are inset within the banding and will provide additional depth and interest to the elevations. Overall, this is a successful modern interpretation of existing estate architecture.
- 423. As mentioned earlier, the ground floor frontage to Weston Street is enlivened by front doors of duplexes, the recessed main entrance to upper floor apartments, and by small front gardens behind low brick walls. This will add some interest and life to the street. However, the detailed arrangement of the front gardens offers little amenity to the ground floor, with visitors lead directly past the living-room windows. This could be eased by repositioning the gates and/or adjusting the flat entrances. By comparison, the ground floor at the rear of the building comprises plant room and storage, making for a dull façade and little oversight of the roadway. Whilst this is a consequence of extensive service requirements and having a relatively narrow building with only two principal facades, thought could nonetheless be given to including a fixed window onto the bike store or extending the ground floor residential accommodation along this flank to offer some engagement. On a similar note, thought should be given to including a planted margin at the narrow end of the building and/or removing the adjacent proposed car parking space, improving the amenity (outlook and noise) to the living-room

#### Conclusion

- 424. Overall, the positioning, general built form and elevational designs of the new building are welcome, subject to slight adjustments of the ground floor. Whilst a general height of five modern storeys is sufficiently comfortable, the scale (height and bulk) generated by the additional part 6th floor is not supported, disrupting the local townscape and spoiling an otherwise convincing design proposal. An objection to the infill of Site #1 is therefore raised on design grounds.
- 425. **Site 2- Long Lane**  
The ball court forms a conspicuous gap in the building frontage of Long Lane between a robust, traditional 4-storey warehouse to the east (no.208 Long Lane) and a smaller 4-storey modern apartment building to the west (nos.202-204 Long Lane).

426. The building has a T-shaped footprint, with the arm of the T arranged onto Long Lane and its perpendicular running east-west towards the estate. The massing will infill much of the street frontage, abutting with the metalclad side extension of the warehouse, but retaining a small gap of c.4m with the residential block for amenity and maintenance access. The new building will come forward onto a common building line with its neighbours, which will nonetheless leave a small area to the front. This will allow additional pavement space around the communal entrance and small front gardens/ threshold space to the proposed duplex apartments, which have separate entrances. This is effective in completing the street scene and providing a well activated frontage, as well as good defensible space for the duplex units on this busy road.

427. The general scale of five main storeys onto the street is comparable to that of the adjacent warehouse building (c.15.5m to parapet), albeit a little higher at c.17m. The shoulder height will rise considerably higher than the modern apartment building to the west (c.12m) , but not to the extent that the step change in scale is uncomfortable, particularly given the varied building heights along this side of the street. Moreover, it will be visibly less tall and bulky than the modern commercial/ apartment block on the opposite side of Long Lane.

428. The proposal has a 6th floor, although this is mostly set back from the street frontage towards the rear of the building, with only the stair and lift core presenting to the front. Whilst the core is not as secondary as it could be, it nonetheless reads more as an articulation of the shoulder line rather than an additional storey. It has also been detailed to provide visual interest rather than rooftop bulk (see later). Due to street trees and the narrowness of Long Lane relative to its taller buildings, views along Long Lane tend to be oblique. Given that the top floor will be set well back from the flanks of the site, the additional height will be relatively inconspicuous.

429. At the rear is the proposed replacement ball court, play area and landscaping intervene between the new building and the adjacent estate blocks (nos. 42-72 and 73-82). It will therefore be set within a relatively spacious location, such that the new building will not appear dominant or overbearing when viewed from within the estate. Its scale will be experienced as part of the building context of Long Lane rather than as part of the estate. Furthermore, the relationship is eased by the T-shaped massing, which is designed to set back from the flanks to provide private gardens and address neighbouring amenity concerns, and eroded by the stacked in-bound balconies, which also lend a more spacious setting to the building. Overall, the height and bulk at the rear are sufficiently comfortable. The detailed architecture the Long Lane frontage features robust brickwork in light multi-stock red colour, and an ordered arrangement of punched-hole openings with large deep-set windows, the size and depth of which are emphasized by stepped brickwork reveals. A moderately taller ground floor and double-height communal entrance bring a secondary scale to the elevations, preventing the proportions of the building appearing squat. The communal entrance features a projecting entrance surround, comprising tinted concrete and profiled with a stepped reveal, which will be highly legible, if not rather overblown. Nonetheless, its double-height size picks up on the scale of the commercial units opposite. The separate entrances to the ground floor duplexes are matching in detail, but more domestic in scale, which is welcome.

430. At roof level, the building's shoulder is finished in a simple metal capping that runs across the front elevation, with the core partly landing immediately behind onto the parapet wall. The core is dressed in the same brickwork, but profiled to form vertical brickwork slots, several with narrow fixed window lights. The detailing provides an elegant flourish to the elevation and allows the overrun to read as less impactful in terms of rooftop bulk. The detailing of the finish (including its junctioning with the parapet) would need to be conditioned. Overall, the building has a warehouse scale coupled with an art deco aesthetic that is engaging.

431. At the rear, the aesthetic is simplified compared to the front, which is typical for secondary elevations. Importantly, the finish remains consistent in its use of the same facing brick and matching mortar. The proportions take on a stronger horizontal bias, with the wide recessed balconies lining up with wide window openings into horizontal bands, partly relieved by the window mullions. The arrangement works well with art deco aesthetic and is reminiscent of the host architecture of the estate, although the use of the single brick colour (plum red) and additional scale will appear tougher. Whilst the building will tend to be read as part of the context of Long Lane rather than the estate, a lighter red multi-stock would nonetheless soften its appearance. This could be reviewed by condition.

## Conclusion

432. Overall, the positioning, general built form and elevational designs of the new building are welcome, subject to confirmation of the detailed designs and material finishes. Whilst at part 5/6-storeys the building will be slightly taller than its immediate neighbours either side and the wider estate to the rear, its scale is softened by its articulated massing at 6th floor level onto the street and by the eroded form at the rear. The additional height is moderate and experienced as part of the varied context within Long Lane that includes more substantial buildings opposite, and against the spacious setting of the replacement ball court/play space at the rear. The architecture is engaging, if slightly overstated, but references the estate. Nonetheless, the building would be read more within the character of Long Lane, minimising its impact on the townscape and sense of local distinctiveness within the estate. No objection is raised to the proposals for Site #2 on design grounds.

### 2025 re-consultation:

433. Previous comments remain valid. Following on from the design and conservation consultation response of October 2022 and in advance of the Planning Committee Meeting of September 2023 we reviewed the scheme in the round. We looked in particular the design concerns raised about the massing and bulk of the 6th storey of the Site #1 proposal.

434. In considering this we took into account that the 6th storey is not a full floor of accommodation but is well set-back from the front (1.8m) and rear facades (4.5m) and over 13.5 from the north edge of the building (taking up less than half of the roof plan). This means that the massing at this level will be less prominent when viewed from the street and will not appear discordant in the context of Weston Street.

This part of Weston Street includes large housing blocks that are 4 and 5-storeys tall, some with large oversailing roofs and chimneys. In this context we concluded at the time that the essentially 5-storey Site #1 building with its recessive and well set back 6th floor is considered acceptable and should be recommended to the Committee for approval.

435. We also placed great weight on the high quality family housing provided on the 6th floor that complies with all our design standards in reaching our final recommendation before it was considered by the Committee.

Local Economy Team

Initial consultation:

436. No comments received.

2025 re-consultation:

437. No comments received.

Environmental Protection Team

Initial consultation:

438. No objection and recommended conditions in relation to internal noise levels and plant noise.

2025 re-consultation:

439. No comments received.

Children and Youth Play / The Head of Culture

Initial consultation:

440. 'My remit includes youth work related services and three adventure play sites. It doesn't extend to regular playgrounds and sports provision.  
Having said that I did have a look at the proposals and noticed that the ball court / Multi-Use Games Area (MUGA) would be replaced by a new external MUGA / community / sports / play facility and that the existing children's play area would be replaced by a new children's play areas.  
I also noted that there is a very small loss of MUGA square footage but a considerable gain in terms of children's play area. Based on all of the above I don't have any formal comments to make.'

2025 re-consultation:

441. No comments received.

Transport Policy

Initial consultation 2023:

442. No objection in principle and recommended permission be granted subject to conditions. The following concerns were raised:

- The creation of a new one-way through road within this estate's internal courtyard beside Site 1 is unacceptable
- The footway adjoining Site 2 on Long Lane is substandard with uneven surface and will therefore be reconstructed and, the recurring bollards on it will have to be removed
- The section of the adjacent footway forming the dropped kerb into the building abutting the eastern periphery of Site 2 on Long Lane is badly damaged and experiencing significant ponding and should therefore be reconstructed with improved drainage
- Pedestrians would also benefit from the creation of a raised entry treatment at Weston Street/Elim Street junction plus the upgrade of the zebra crossing on Long Lane to a raised zebra crossing as there is currently no speed reduction mechanism on this road segment.

2025 re-consultation:

443. A Transport Statement (TS) has been submitted in support of the revised application. The TS follows the same scope and methodology as the TS which accompanied the previous consented application.

444. The proposed external layout of the development is as per the consented scheme, as is the car parking and delivery and servicing arrangements. On this basis, these are acceptable in principle, although the applicant should confirm where blue badge spaces are located in relation to the proposed accessible units. In terms of the vehicle tracking, the drawings submitted are acceptable.

445. The proposed cycle stores have been relocated in comparison with the consented scheme. Cycle parking is proposed in accordance with adopted Southwark Plan (2022) standards, which is welcomed. The applicant should confirm that a minimum of 5% of all spaces can accommodate larger/non-standard cycles, and a minimum further 20% are in standard sheffield stand form. Any remaining cycle parking must be in the form of two-tier racks only. An annotated plan illustrating dimensions of the cycle stores (including clearances between stands, aisle widths etc), should be secured by condition. Given the limited changes in comparison with the previous scheme, and compliance with the higher Southwark Plan standards, specifics around stand types and proportions can be dealt with by condition in this instance.

446. Given the scale of development, the proposals would not be expected to result in a material impact on local transport and highways networks.

447. LBS Highways Development should be consulted on the s278 works required in comparison with the consented scheme, however these are likely to include resurfacing of carriageways and footways binding the site and the

construction/improvement of proposed/existing accesses in accordance with LBS design standards. A stage 1 Road Safety Audit (RSA) of the newly proposed access (extension of Pardoner Street) should also form part of the s278 process and be secured by condition.

The following documents should be secured by condition:

- Detailed Delivery and Servicing Management Plan
- Full Travel Plan; and
- Construction and Environmental Management Plan.

### Highways Team

Initial consultation:

448. Required pedestrian inter-visibility splays at the exit from Pardoner Street to Weston Street, Swept Path Analysis drawings, bin stores and items to be included in a S278 agreement.

2025 re-consultation:

449. No comments received.

### Flood Risk Management

Initial consultation (final comments following a number of re-consultations in 2022):

450. The outstanding matters reassessed were as follows:

- The proposed storage volume for each SuDS feature differs across the drawings, dimensions provided on the drawings, calculations, and SuDS Proformas. The proposed storage volume for each feature should be clearly stated and all documents should be updated so they are in line with each other. The calculations for Site 2 do not include the whole site area of 0.2165ha.
- The applicant has provided calculations. However, these do not match with those stated in the SuDS Proforma. The site area for site 2 should be confirmed, as the figure of (0.075ha) does not match what is stated within the SuDS Proforma (0.2165ha). Existing runoff rate calculations should be provided for the full site area.
- The applicant has provided greenfield runoff rates for site 2 which use a site area of 0.075ha. The SuDS Proforma states that the Site 2 area is 2165m<sup>2</sup>. The applicant should confirm why the greenfield calculations have not been based on the whole site area.
- The application has changed in the following way: The applicant has provided an updated Flood Risk and Drainage Strategy for both site 1 and site 2 (Rev H). Responses to each of the outstanding matters has also been provided.

451. Object for the following reasons:

- More information required – The applicant has confirmed the proposed attenuation storage which has been aligned across the drawings and SuDS Proformas for both sites. The applicant should provide updated calculations for site 2 which include the full site area of 0.2165ha.
- More information required – The applicant has confirmed that the site area for site 2 is 0.2165ha and this is consistent within the report. Existing runoff rate calculations should be provided which use the full site area of 0.2165ha.
- Decision: Based on the above, we recommend that the application is not approved. There are details which require more information.

2025 re-consultation:

452. No comments received.

Urban Forester

Initial consultation:

453. No objection and advised that a net loss in CAVAT value of £52,485 should be agreed via a legal agreement.

2025 re-consultation:

454. There are no changes to the proposed tree removals nor CAVAT value. The discrepancy in new tree planting numbers has been clarified in the most recent landscape design proposal (35 total). The tree planting condition wording has been revised accordingly. Amendments are required as before to provide more drought tolerant species which can be also be dealt with via this condition. Overall, there is a net loss in CAVAT value of £52,485 which should be agreed via s106. The UGF is policy compliant.

Community Infrastructure levy and S106 Team

Initial consultation:

455. The site is located within Southwark CIL Zone 3, and MCIL2 Band 2 Zone. Based on the GIA measurements obtained from the Proposed Tenure Mix and Design & Access Statement (dated 11.03.2022), the gross amount of CIL is approximately £1,000,804.47 (pre-relief). Subject to the correct CIL forms being submitted on time, CIL Social Housing Relief can be claimed for a number of types of affordable housing. Based on the Proposed Tenure Mix, the CIL estimate is revised to £632,148.58 if Social Housing Relief is successfully claimed for. It should be noted that this is an estimate, floor areas will be checked when related CIL Assumption of Liability form is submitted, after planning approval has been secured.

2025 re-consultation:

456. The site is located within Southwark CIL Zone 2 and MCIL2 Central London Zone. Based on the applicant's CIL Form1 (GIA) dated 16-May-22, the gross amount of CIL is approximately £1,314,021.64 (pre-relief). Subjecting to the correct CIL forms being submitted on time, CIL Social Housing Relief can be claimed for a number of types of affordable housing, and since all 34 units would be social rented, 100% of CIL relief is anticipated once the claimants complete relief claim procedures. It should be noted that this is an estimate subject to change, and the floor areas will be checked when related CIL Assumption of Liability Form and Relief Claim Form are submitted, after planning approval has been obtained."

#### Ecologist

Initial consultation:

457. No objection and recommend permission be granted subject to conditions.

2025 Re-consultation:

458. Although submitted prior to mandatory BNG the application has demonstrated that it is providing a net gain for biodiversity.

459. The proposed biodiverse green roofs should include a low nutrient substrate with a varied depth of 150mm-200mm. The roofs should be seeded and plug planted with wildflower species and meet the requirements of GRO Code. Features for invertebrates such as log and sand piles should be included. Sedum species should be avoided. This style of green roof is compatible with PV arrays.

460. Recommended conditions in line with previous ecology comments  
 Bat boxes x 6  
 Invertebrate features x 6  
 Bird boxes x 18  
 Green roof  
 LEMP to include green roofs, habitat features and ground level landscaping.  
 Recommended informative - Nesting birds

#### Waste Management

Initial consultation:

461. Clarification sought on dropped kerbs in relation to bin stores and reversing distances for Elim Street.

2025 re-consultation:

462. No comments received.

#### Planning Policy Team

Initial consultation:

463. No objection.

2025 re-consultation:

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464. Following re-consultation our Planning Policy Team advised that 'the application has been resubmitted and must now comply with Part L 2021 requirements. This means all carbon emissions calculations must be based on SAP 10.2. While the applicant has included previous figures using SAP 10 for reference, they have not provided updated carbon emissions reductions for the Be Lean, Be Clean, and Be Green stages using SAP 10.2. These updated figures are essential for assessing the revised Energy Statement and must be included in the energy statement.

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465. The tables on page 6 showing Regulated CO<sub>2</sub> Savings at the Be Green stage and the Cumulative Savings currently reference SAP 10. The applicant must confirm that SAP 10.2 has been used throughout to calculate both the carbon emissions baseline and the emissions reductions, in line with Part L 2021 requirements.

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466. The applicant must provide baseline carbon emissions using SAP 10.2 in line with Part L 2021. This should be submitted through the completed GLA Carbon Emissions Reporting Spreadsheet, which is used to calculate emissions reductions across the energy hierarchy.

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467. **Carbon offset payment:**  
 The carbon offset payment, as set out in the energy statement is 10.99 tCO<sub>2</sub>/yr x 30 yrs x 95£/tCO<sub>2</sub> = £31,321.50.

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468. **Be Lean**  
 The applicant is asked to provide further details on the passive design measures included in the proposal. Specifically, have they considered strategies such as optimising building orientation and site layout, incorporating natural ventilation and daylighting, using thermal mass, and applying solar shading? Additionally, please confirm whether these measures are outlined in the Design and Access Statement. The applicant must provide the full SAP worksheets for the DER/TER calculations at all three stages: Be Lean, Be Clean, and Be Green.

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469. **Be Clean**  
 The applicant has stated that a communal heat network is not being provided, citing limited space for a plant room, a small number of households to share capital costs, and low overall heat demand, which they argue makes a centralised system inefficient. However, as the site is located near a proposed heat network, the applicant must provide further justification for why a futureproofed connection is not feasible. This should include more detailed evidence supporting the claims around capital costs, space constraints, and inefficiency.

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470. **Be Green**  
 The site is located within a Heat Network Priority Area (HNPA) and is in close proximity to a proposed heat network. As per GLA guidance, individual heating systems are not compatible with District Heat Networks and are therefore not policy compliant in HNPAs. To comply with London Plan Policy SI 3, the development must include a communal low-temperature heating system and

select a heat source in accordance with the heating hierarchy. The applicant must provide a clear justification for not futureproofing the development for connection to the nearby proposed heat network, including detailed evidence on space constraints, capital costs, and heat demand.

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471. Heat pumps

The applicant must confirm how many Air Source Heat Pumps (ASHPs) are proposed on site. While the report states that the system involves individual ASHPs located externally grouped at roof level and connected to internal hot water cylinders, it is unclear to officers whether the system is centralised or fully individual. The applicant should clarify the system being used (including number of ASHPs and the overall efficiency of the system) and explain how heat demand will be metered at the individual unit level.

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472. Overheating

The applicant is proposing MVHR (Mechanical Ventilation with Heat Recovery) to manage overheating where necessary. To support this approach, the applicant must outline what passive shading measures have been implemented on-site to reduce reliance on active cooling systems.

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473. The applicant must provide full details of the proposed active cooling plant, including system efficiencies and whether it can utilise free cooling or renewable cooling sources.

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474. EUI and SHD

The applicant has provided EUI and SHD values of 69.18 kWh/m<sup>2</sup>/yr and 14.97 kWh/m<sup>2</sup>/yr respectively. Please provide justification for the difference between these figures and clarify how each has been calculated.

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475. Be Seen

Can the applicant please:

- Upload the necessary contextual and performance data to the 'be seen' portal
- Confirm the target dates for all subsequent 'be seen' stages
- That metering plans that will enable the in-use energy performance reporting are in place.

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476. These are the obligations to secure - this is what standard wording needs to be applied.

- Carbon offset: £31,321.5
- Agreed carbon target (cumulative figure): 10.99 tCO<sub>2</sub>/yr / 71.12 % reduction against Part L 2021
- Be Seen
- Energy review mechanisms

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Final comments:

477. Have reviewed the following and there are no further actions required:

- Document with the queries and answers
- SAP outputs for both sites (Be Lean and Be Green)

- Updated Energy Report
- Be Seen spreadsheet
- GLA Carbon Emission Reporting spreadsheet

## Human rights implications

478. This planning application engages certain human rights under the Human Rights Act 1998 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.

479. This application has the legitimate aim of providing much-needed social housing. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

## Positive and proactive statement

480. The council has published its development plan and Core Strategy on its website together with advice about how applications are considered and the information that needs to be submitted to ensure timely consideration of an application. Applicants are advised that planning law requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

481. The council provides a pre-application advice service that is available to all applicants in order to assist applicants in formulating proposals that are in accordance with the development plan and core strategy and submissions that are in accordance with the application requirements.

## 482. Positive and proactive engagement: summary table

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

## CONCLUSION

483. In light of the increase of housing need across the borough, from over 13,000 households to over 20,000 households, officers consider that delivery of additional social rent homes carries substantial public benefit.

484. It is therefore recommended that planning permission be granted, subject to conditions and the timely completion of a S106 Agreement.

485. In reaching this conclusion, the Council as the local planning authority, has had due regard to all residents with protected characteristics, including households who have moved onto the estate since the application was last considered in September 2023.

## BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Local Development Framework and Development Plan Documents	Planning and Growth Directorate 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 0207 525 0254 Council website: www.southwark.gov.uk

## APPENDICES

No.	Title
Appendix 1	Recommendation (draft decision notice)
Appendix 2	Consultation undertaken
Appendix 3	Consultation responses received
Appendix 4	Relevant planning history

## AUDIT TRAIL

<b>Lead Officer</b>	Stephen Platts, Director of Planning and Growth	
<b>Report Author</b>	Andre Verster, Senior Planning Officer	
<b>Version</b>	Final	
<b>Dated</b>	1 October 2025	
<b>Key Decision</b>	No	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>		
<b>Officer Title</b>	<b>Comments Sought</b>	<b>Comments included</b>
Strategic Director, Resources	No	No
Strategic Director, Environment, Sustainability and Growth	No	No
Strategic Director, Housing	No	No
<b>Date final report sent to Constitutional Team</b>		2 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.

<b>Applicant</b>	Leathermarket Community Benefit Society	<b>Reg. Number</b>	22/AP/1887
<b>Application Type</b>	Major application	<b>Case Number</b>	H21
<b>Recommendation</b>	GRANT permission		

**Draft of Decision Notice**

**planning permission is GRANTED for the following development:**

Construction of 34 new social rented homes across two separate buildings, along with the provision of external community/play/sports facilities and associated landscaping and car parking. (resub)

Elim Estate Weston Street London Southwark

**In accordance with application received on 30 May 2022 and Applicant's Drawing Nos.:**

Existing Plans

Proposed Plans

Plans - Proposed 0612-BPA-BB-DR-A-(P1)100 P02 received  
Plans - Proposed 0612-BPA-BB-DR-A-(P1)101 P01 received  
Plans - Proposed 0612-BPA-BB-DR-A-(P1)102 P01 received  
Plans - Proposed 0612-BPA-BB-DR-A-(P1)103 P01 received  
Plans - Proposed 0612-BPA-BB-DR-A-(P1)104 P01 received  
Plans - Proposed 0612-BPA-BB-DR-A-(P1)105 P01 received  
Plans - Proposed 0612-BPA-BB-DR-A-(P1)106 P01 received  
Plans - Proposed 0612-BPA-BB-DR-A-(P1)200 P01 received  
Plans - Proposed 0612-BPA-BB-DR-A-(P1)201 P01 received  
Plans - Proposed 0612-BPA-BB-DR-A-(P1)300 P01 received  
Plans - Proposed 0612-BPA-CC-DR-A-(P1)110 P02 received  
Plans - Proposed 0612-BPA-CC-DR-A-(P1)111 P01 received  
Plans - Proposed 0612-BPA-CC-DR-A-(P1)112 P01 received  
Plans - Proposed 0612-BPA-CC-DR-A-(P1)113 P01 received  
Plans - Proposed 0612-BPA-CC-DR-A-(P1)114 P01 received  
Plans - Proposed 0612-BPA-CC-DR-A-(P1)115 P01 received  
Plans - Proposed 0612-BPA-CC-DR-A-(P1)116 P01 received  
Plans - Proposed 0612-BPA-CC-DR-A-(P1)210 P01 received  
Plans - Proposed 0612-BPA-CC-DR-A-(P1)211 P01 received  
Plans - Proposed 0612-BPA-CC-DR-A-(P1)305 P01 received  
Plans - Proposed 0612-BPA-CC-DR-A-(P3)200 P01 received  
Plans - Proposed 0612-BPA-XX-DR-A-(P0)050 P01 received  
Plans - Proposed 0612-BPA-XX-DR-A-(P1)001 P01 received  
Plans - Proposed 0612-BPA-XX-DR-A-(P1)050 P01 received  
Plans - Proposed 0612-BPA-XX-DR-A-(P1)405 P01 received

**Time limit for implementing this permission and the approved plans**

2. The development hereby permitted shall be begun before the end of three years from the date of this permission.

Reason:

As required by Section 91 of the Town and Country Planning Act 1990 as amended.

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

3. Road Safety Audit

Prior to the commencement of any development, a detailed Road Safety Audit (RSA) shall be submitted to and approved in writing by the Local Planning Authority. This should include the formal assessment of potential road-safety related to any potential problems connected with a new road or road improvement scheme. The RSA should consider only those matters having an adverse effect on road safety.

Reason:

In order to ensure due consideration to the safety of all road users using the public highway particularly the more vulnerable including pedestrians, cyclists and motorcyclists as required by policies P51 (Walking) and P53 (Cycling) of the Southwark Plan (2022).

4. Arboricultural Method Statement

Prior to works commencing, including any demolition, an Arboricultural Method Statement shall be submitted to and approved in writing by the Local Planning Authority. a) A pre-commencement meeting shall be arranged, the details of which shall be notified to the Local Planning Authority for agreement in writing prior to the meeting and prior to works commencing on site, including any demolition, changes to ground levels, pruning or tree removal. b) A detailed Arboricultural Method Statement showing the means by which any retained trees on or directly adjacent to the site are to be protected from damage by demolition works, excavation, vehicles, stored or stacked building supplies, waste or other materials, and building plant, scaffolding or other equipment, shall then be submitted to and approved in writing by the Local Planning Authority. The method statements shall include details of facilitative pruning specifications and a supervision schedule overseen by an accredited arboricultural consultant.c) Cross sections shall be provided to show surface and other changes to levels, special engineering or construction details and any proposed activity within root protection areas required in order to facilitate demolition, construction and excavation. The existing trees on or adjoining the site which are to be retained shall be protected and both the site and trees managed in accordance with the recommendations contained in the method statement. Following the pre-commencement meeting all tree protection

measures shall be installed, carried out and retained throughout the period of the works, unless otherwise agreed in writing by the Local Planning Authority. In any case, all works must adhere to BS5837: (2012) Trees in relation to demolition, design and construction and BS3998: (2010) Tree work - recommendations. If within the expiration of 5 years from the date of the occupation of the building for its permitted use any retained tree is removed, uprooted is destroyed or dies, another tree shall be planted at the same place and that tree shall be of such size and species, and shall be planted at such time, as may be specified in writing by the Local Planning Authority.

Reason: To avoid damage to the existing trees which represent an important visual amenity in the area, in accordance with The National Planning Policy Framework 2024; Policies G1 (Green Infrastructure, G5 (Urban Greening) and G7 (Trees and Woodlands) of the London Plan 2021; and policies of The Southwark Plan 2022: P56 Protection of amenity; P57: Open space; P58: Open water space; P59: Green infrastructure, P66 Reducing noise pollution and enhancing soundscapes, P13: Design of places; P14: Design quality; P15: Residential design, P20: Conservation areas; P21: Conservation of the historic environment and natural heritage and P60 Biodiversity.

## 5. Bat nesting boxes / bricks

Details of bat nesting boxes / bricks shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of the development hereby granted permission. No less than six nesting boxes / bricks shall be provided and the details shall include the exact location, specification and design of the habitats. The boxes / bricks shall be installed with the development prior to the first occupation of the building to which they form part or the first use of the space in which they are contained. The nesting boxes / bricks shall be installed strictly in accordance with the details so approved, shall be maintained as such thereafter. Discharge of this condition will be granted on receiving the details of the nest/roost features and mapped locations and Southwark Council agreeing the submitted plans, and once the nest/roost features are installed in full in accordance to the agreed plans. A post completion assessment will be required to confirm the nest/roost features have been installed to the agreed specification.

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with Chapter 15 (Conserving and enhancing the natural environment) of the National Planning Policy Framework (2024); Policy G6 (Biodiversity and access to nature) of the London Plan (2021); P56 Protection of amenity, P57 Open space, P58 Open Water space, P59 Green

infrastructure, P60 Biodiversity, P66 Reducing noise pollution and enhancing soundscapes and P69 Sustainable standards of the Southwark Plan (2022).

6. Swift nesting boxes / bricks

Details of Swift nesting boxes / bricks shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of the development hereby granted permission. No less than 18 nesting boxes / bricks shall be provided and the details shall include the exact location, specification and design of the habitats. The boxes / bricks shall be installed with the development prior to the first occupation of the building to which they form part or the first use of the space in which they are contained. The Swift nesting boxes / bricks shall be installed strictly in accordance with the details so approved, shall be maintained as such thereafter. Discharge of this condition will be granted on receiving the details of the nest/roost features and mapped locations and Southwark Council agreeing the submitted plans, and once the nest/roost features are installed in full in accordance to the agreed plans. A post completion assessment will be required to confirm the nest/roost features have been installed to the agreed specification.

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

7. Construction Management Plan

Construction Environmental Management Plan (CEMP) - pre approval

No development shall take place, including any works of demolition, until a written CEMP has been submitted to and approved in writing by the Local Planning Authority. The CEMP shall oblige the applicant, developer and contractors to commit to current best practice with regard to construction site management and to use all best endeavours to minimise off-site impacts, and will include the following information:

- a) The protection of cyclists on LCN22 during construction;
- b) A detailed specification of demolition and construction works at each phase of development including consideration of all environmental impacts and the identified remedial measures;

- o Site perimeter continuous automated noise, dust and vibration monitoring;
- o Engineering measures to eliminate or mitigate identified environmental impacts e.g. hoarding height and density, acoustic screening, sound insulation, dust control measures, emission reduction measures, location of specific activities on site, etc.;
- o Arrangements for a direct and responsive site management contact for nearby occupiers during demolition and/or construction (signage on hoardings, newsletters, residents liaison meetings, etc.)
- o A commitment to adopt and implement of the ICE Demolition Protocol and Considerate Contractor Scheme; Site traffic - Routing of in-bound and outbound site traffic, one-way site traffic arrangements on site, location of lay off areas, etc.;
- o Site waste Management - Accurate waste stream identification, separation, storage, registered waste carriers for transportation and disposal at appropriate destinations.
- o A commitment that all NRMM equipment (37 kW and 560 kW) shall be registered on the NRMM register and meets the standard as stipulated by the Mayor of London

To follow current best construction practice, including the following:-

- o Southwark Council's Technical Guide for Demolition & Construction at <http://www.southwark.gov.uk/construction>
- o Section 61 of Control of Pollution Act 1974,
- o The London Mayors Supplementary Planning Guidance 'The Control of Dust and Emissions During Construction and Demolition',
- o The Institute of Air Quality Management's 'Guidance on the Assessment of Dust from Demolition and Construction' and 'Guidance on Air Quality Monitoring in the Vicinity of Demolition and Construction Sites',
- o BS 5228-1:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites. Noise',
- o BS 5228-2:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites. Vibration'
- o BS 7385-2:1993 Evaluation and measurement for vibration in buildings. Guide to damage levels from ground-borne vibration,
- o BS 6472-1:2008 'Guide to evaluation of human exposure to vibration in buildings - vibration sources other than blasting,

- o Relevant Stage emission standards to comply with Non-Road Mobile Machinery (Emission of Gaseous and Particulate Pollutants) Regulations 1999 as amended & NRMM London emission standards <http://nrmm.london/>

All demolition and construction work shall be undertaken in strict accordance with the approved CEMP and other relevant codes of practice, unless otherwise agreed in writing by the Local Planning Authority.

**Reason**

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

**8. Play equipment and landscaping**

Details of the proposed play equipment on site 2 and site 4 and associated hard and soft landscaping shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of the development hereby granted permission.

**Reason**

To ensure that present or future users of the play area do not suffer a loss of amenity in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity), and the National Planning Policy Framework 2024.

**9. Fence - Multi Use Games Area**

Details of the fence of the Multi Use Games Area on site 2 shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of the development hereby granted permission.

**Reason:**

In order to protect the amenity of the occupiers of the adjoining residential premises from undue noise in accordance with Chapter 8 (Promoting healthy and safe communities) of the National Planning Policy Framework (2024) and Policy P56 (Protection of amenity) of the Southwark Plan (2022).

## 10. MATERIALS

Details of the detailed designs and material finishes (2 copies) to be used in the carrying out of this permission shall be submitted to and approved by the Local Planning Authority before any work in connection with this permission is carried out and the development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

In order to ensure that these samples will make an acceptable contextual response in terms of materials to be used, and achieve a quality of design and detailing in accordance with Chapter 12 (Achieving well-designed places) of the National Planning Policy Framework (2024); Policy D4 (Delivering good design) of the London Plan (2021); Policy P13 (Design of Places) and Policy P14 (Design Quality) of the Southwark Plan (2022).

## 11. Secure By Design Measures

Before any work hereby authorised begins details of security measures to minimise the risk of crime and to meet the specific security needs of the development in accordance with the principles and objectives of Secured by Design shall be submitted to and approved in writing by the local planning authority. The development shall be implemented in accordance with the approved details.

Reason:

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

## 12. Sustainable Drainage Systems (SuDS)

No works (excluding demolition and site clearance) shall commence until full details of the proposed surface water drainage system incorporating Sustainable Drainage Systems (SuDS) have been submitted to and approved in writing by the Local Planning Authority, including detailed design, size, and location of attenuation units and details of flow control measures. The strategy should achieve a reduction in surface water runoff rates during the 1% Annual Exceedance Probability (AEP) event plus climate change allowance, as detailed in the Flood Risk Assessment and Drainage Statement prepared by Infrastruct CS Ltd (dated September 2025). 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).

13. Tree planting

Prior to works commencing, full details of all proposed tree planting totalling 786cm girth 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) Chapters 8 (Promoting healthy and safe communities), 11 (Making effective use of land), 12 (Achieving well-designed places), Chapter 14 (Meeting the challenge of climate change), and chapters 15 & 16 (Conserving and enhancing the natural and historic environment); Policy G7 (Trees and Woodlands) of the London Plan (2021); Policy P13 (Design of Places), Policy P14 (Design Quality), Policy P56 (Protection of Amenity), Policy P57 (Open Space), Policy P60 (Biodiversity) and P61 (Trees) of the Southwark Plan (2022).

#### 14. 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.

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

15. HARD AND SOFT LANDSCAPING

Before any above grade work hereby authorised begins, detailed drawings of a hard and soft landscaping scheme showing the treatment of all parts of the site not covered by buildings (including cross sections, available rooting space, tree pits, surfacing materials of any parking, access, or pathways layouts, materials and edge details), shall be submitted to and approved in writing by the Local Planning Authority. Details of the soft landscaped area at the northern access on Pardoner Street (site 1) should include a low growing plant/grass species of no more than a height of 300mm and not of a woody nature. This would be secured by a condition. 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. The planting, seeding and/or turfing shall be carried out in the first planting season following completion of building works and any trees or shrubs that is found to be dead, dying, severely damaged or diseased within five years of the completion of the building works OR five years of the carrying out of the landscaping scheme (whichever is later), shall be replaced in the next planting season by specimens of the equivalent stem girth and species in the first suitable planting season. Planting shall comply to BS: 4428 Code of practice for general landscaping operations, BS: 5837 (2012) Trees in relation to demolition, design and construction and BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf).

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

16. GREEN ROOFS FOR BIODIVERSITY

Part 1: Before any above grade work hereby authorised begins, details of the biodiversity (green/brown) roof(s) shall be submitted to and approved in writing by the Local Planning Authority. The biodiversity (green/brown) roof(s) shall be:

- biodiversity based with extensive substrate base (depth 80-150mm);
- laid out in accordance with agreed plans; and

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

The biodiversity (green/brown) roof shall not be used as an amenity or sitting out space of any kind whatsoever and shall only be used in the case of essential maintenance or repair, or escape in case of emergency. The biodiversity roof(s) shall be carried out strictly in accordance with the details so approved and shall be maintained as such thereafter.

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

Reason:

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

## 17. ECOLOGICAL MANAGEMENT PLAN

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

Reason: This condition is necessary to ensure the protection of wildlife and supporting habitat and secure opportunities for the enhancement of the nature conservation value of the site. This is a mandatory criteria of BREEAM (LE5) to monitor long term impact on biodiversity a requirement is to produce a Landscape and Habitat Management Plan.

## 18. Invertebrate habitats

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 6 Bee bricks and/or invertebrate hotels shall be provided and the details shall include the exact location, specification and design of the habitats. Bee bricks and/or invertebrate hotels shall be installed with the development prior to the first occupation of the building to which they form part or the first use of the space in which they are contained.

The Bee bricks and/or invertebrate hotels shall be installed strictly in accordance with the details so approved, shall be maintained as such thereafter.

Discharge of this condition will be granted on receiving the details of the invertebrate features and mapped locations and Southwark Council agreeing the submitted plans, and once the invertebrate features are installed in full in accordance to the agreed plans.

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with policies: G6 of the London Plan 2021, Policy P59 and P60 of the Southwark Plan 2022.

## 19. PROVISION OF REFUSE STORAGE

Before any above grade work hereby authorised begins, details (1:50 scale drawings), including storage capacity, elevation and external materials, of the facilities to be provided for refuse storage shall be submitted to and approved in writing by the Local Planning Authority. The refuse storage arrangements shall be provided as detailed on the drawings approved and shall be made available for use by the occupiers of the dwellings. The facilities provided shall thereafter be retained and shall not be used or the space used for any other purpose.

Reason:

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

20. Accessible housing

Prior to commencement of above grade works, the applicant shall submit and obtain approval from the Local Planning Authority, sufficient details including written confirmation from the appointed Building Control body that the following standards in the Approved Document M of the Building Regulations 2015 (As Amended) would be met for the units / habitable rooms as set out below.

- M4 (Category 2) 'accessible and adaptable':- up to 90%
- M4 (Category 3) 'wheelchair user dwellings':- at least 10% to include the following
  - to be constructed to M4(3)(2)(a)
  - \*\*\*\* to be constructed as M4(3)(2)(a)
  - \*\*\*\* to be constructed as M4(3)(2)(b) and in full accordance with the standards set out in Southwark Plan (2022) Policy P8 Table 5: Wheelchair homes design and access standards

The development shall be carried out in accordance with the details thereby approved.

Reason: In order to ensure the development complies with Policy D7 (Accessible housing) of the London Plan (2021) and Policy P8 (Wheelchair accessible and adaptable housing) of the Southwark Plan (2022).

**Permission is subject to the following Pre-Occupation Condition(s)****21. Noise - amenity areas**

Private and communal external amenity areas shall be designed to attain 50dB(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 2021.

Note - A reduced standard - 55dB(A) LAeq 16hr † can be used to secure appropriate development. If Balcony/private garden area cannot meet 55dB(A) LAeq 16hr † then further attenuation works should be required to achieve best possible noise level. Consider requiring winter gardens or imperforate high balustrades and absorption on balcony soffit or approval but the space will not count towards the planning policy objective for private amenity space.

**22. Internal ventilation**

The use hereby permitted shall not commence until full particulars and details of a scheme for the internal ventilation of the development which shall include; appropriately located plant, inlets and outlets; filtration and treatment of incoming air to ensure it meets the national standards for external air quality; plant noise output levels; and a management and maintenance plan have been submitted to and approved by the LPA. The development shall be carried out in accordance with the approval given.

## Reason

In order that the Local Planning Authority may be satisfied that the ventilation, ducting, filtration/treatment and ancillary equipment is incorporated as an integral part of the development in the interests of residential amenity in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P65 (Improving air quality), and the National Planning Policy Framework 2021.

23. o LANDSCAPE MANAGEMENT PLAN

Prior to the occupation of the development or any phase of the development, whichever is the sooner, a landscape management plan, including long term design objectives, management responsibilities and maintenance schedules for all landscape areas, other than small, privately owned, domestic gardens, shall be submitted to and approved by the Local Planning Authority.

Details of an irrigation schedule shall be provided for all trees to ensure successful establishment.

For stem girths of up to 20cm the schedule shall be a minimum of three years, and five years for stem girths greater than 20cm. The landscape management plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the local planning authority.

If within a period of five years from the date of the planting of any tree that tree, or any tree planted in replacement for it, is removed, uprooted or destroyed or dies, or becomes, in the opinion of the local planning authority, seriously damaged or defective, another tree of the same species and size as that originally planted shall be planted at the same place in the first suitable planting season, unless the local planning authority gives its written consent to any variation.

## Reason:

To ensure the proposed development will preserve and enhance the visual amenities of the locality and is designed for the maximum benefit of local biodiversity, in addition to the attenuation of surface water runoff in accordance with 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) and Policy P60 (Biodiversity) of the Southwark Plan (2022).

#### 24. AIR SOURCE HEAT PUMPS and PHOTOVOLTAIC PANELS

Prior to the occupation of the development or any phase of the development, whichever is the sooner, details of the number, size and location of air source heat pumps and photovoltaic panels shall be submitted to and approved in writing by the Local Planning Authority.

##### Reason

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance or the local environment from noise creep due to plant and machinery in accordance with the Chapter 12 (Achieving well-designed

places) of the National Planning Policy Framework (2024); Policy D4 (Delivering good design) of the London Plan (2021); Policy P13 (Design of Places) and Policy P14 (Design Quality), Policy P56 (Protection of amenity) and P66 (Reducing noise pollution and enhancing soundscapes) of the Southwark Plan (2022).

#### 25. PRIVACY SCREEN

Prior to the occupation of the development or any phase of the development, whichever is the sooner, details of privacy screens to the all balconies on the east side elevation of the building on site 1 shall be submitted to and approved in writing by the Local Planning Authority.

##### Reason:

In order to protect the privacy and amenity of the occupiers and users of the adjoining premises from undue overlooking in accordance with Chapter 8 (Promoting healthy and safe communities) of the National Planning Policy Framework (2024); Policy D4 (Delivering good design) of the London Plan (2021); and Policy P56 (Protection of amenity) of the Southwark Plan (2022).

#### 26. Secured by Design Certification.

Prior to occupation a satisfactory Secured by Design inspection must take place. The resulting Secured by Design certificate 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 and Policy P16 Designing out crime of the Southwark Plan 2022.

27. Operational Management Plan

Prior to the use of the ballcourt, an Operational Management Plan shall be submitted to and approved in writing by the Local Planning Authority. The Operational Management Plan shall be created after public consultation with Elim Estate Residents, and should include details of the public engagement undertaken. The use and function of the Ball Court on Site 2 shall then, unless otherwise agreed by the Local Planning Authority, comply with the terms of the Operational Management Plan at all times.

The Operational Management Plan shall include:

- The details of public engagement and consultation with Elim Estate Residents in creating the Operational Management Plan
- The arrangements to manage and operate the Ball Court;
- The hours of use

Reason

In order to ensure that the use of the terrace operates in a neighbourly way and is not harmful to the amenity of adjoining occupiers. In accordance with Policy P56 Protection of Amenity of the Southwark Plan 2022.

28. Cycle facilities

Before the first occupation of the development hereby approved, the cycle facilities 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).

29. Drainage 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 Flood Risk Assessment and Drainage Statement prepared by Infrastruct CS Ltd (dated September 2025, ref:3753-ELIM-ICS-02-RP-C-07.001) 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).

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

30. Internal noise levels

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

Bedrooms - 35dB LAeq T†, 30 dB L Aeq T\*, 45dB LAFmax T \*

Living and Dining rooms- 35dB LAeq T †

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

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

A report shall be submitted in writing to and approved by the LPA detailing acoustic predictions and mitigation measures to ensure the above standards are met. Following completion of the development and prior to occupation, a validation test shall be carried out on a relevant sample of premises. The results shall be submitted to the LPA for approval in writing. The approved scheme shall be implemented and permanently maintained thereafter.

#### Reason

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

#### 31. Plant Noise -

The Rated sound level from any plant, including air source heat pumps, together with any associated ducting, shall not exceed the Background sound level (LA90 15min) at the nearest noise sensitive premises. Furthermore, the Specific plant sound level shall be 10dB(A) or more below the background sound level in this location. For the purposes of this condition the Background, Rating and Specific Sound levels shall be calculated fully in accordance with the methodology of BS4142:2014+A1:2019.

Suitable acoustic treatments shall be used to ensure compliance with the above standard. A validation test shall be carried out and the results submitted to the Local Planning Authority for approval in writing to demonstrate compliance with the above standard. Once approved the plant and any acoustic treatments shall be permanently maintained thereafter.

#### Reason

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance or the local environment from noise creep due to plant and machinery in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2024.

## 32. OBSCURE GLAZING TO BE PROVIDED

The windows on the side (east and west) elevations of the building on site 2 shall be obscure glazed and fixed shut 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 Chapter 8 (Promoting healthy and safe communities) of the National Planning Policy Framework (2024); Policy D4 (Delivering good design) of the London Plan (2021); and Policy P56 (Protection of amenity) of the Southwark Plan (2022).

## 33. Provision for alternatively fuelled vehicles

An electric vehicle charging point shall be provided to service a minimum of 20% of the car parking spaces, including the 4 disabled spaces, provided within or for the development.

Reason

To encourage the uptake of electric and hybrid vehicles and minimise the effect of the development on local air quality within the designated Air Quality Management Area in line with Policy 7.14 of the London Plan and to comply with parking standards in Policy 6.13 of the London Plan.

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

## 34. 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.

35. External Lighting

Any external lighting system installed at the development shall comply with the Institute of Lighting Professionals (ILE) Guidance Note 1 for the reduction of obtrusive light (2021). Details of any external lighting (including: design; power and position of luminaries; light intensity contours) of all affected external areas (including areas beyond the boundary of the development) shall be submitted to and approved by the Local Planning Authority in writing before any such lighting is installed. The development shall not be carried out otherwise than in accordance with any such approval given. Prior to the external lighting being used, a validation report shall be submitted to the LPA for approval in writing.

The basketball court shall be lit in accordance with the IES or related standards for the sport

Reason

In order that the Council may be satisfied as to the details of the development in the interest of the visual amenity of the area, the amenity and privacy of adjoining occupiers, and their protection from light nuisance, in accordance with the Southwark Plan 2022 Policy P16 (Designing out crime); Policy P56 (Protection of amenity), and the National Planning Policy Framework 2024.

36. Site Contamination

a) 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.

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

#### Reason

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

#### **Informatics**

- 1 The hard and soft landscaping details should specify a low growing plant species, for example Ophiopogon planiscapus 'Nigrescens', that would not exceed 300mm in height, and that would not be woody in nature.
- 2 Prior to works commencing on site (including any demolition) a joint condition survey should be arranged with Southwark Highway Development Team to catalogue condition of streets and drainage gullies. Please contact Hernan Castano, Highway Development Manager on 020 7525 4706 to arrange.

## APPENDIX 2

### Consultation undertaken

**Site notice date:** 07/08/2025

**Press notice date:** 30/06/2022

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

**Neighbour consultation letters sent:** 08/08/2025

### Internal services consulted

Flood Risk Management & Urban Drainage Team

Flood Risk Management & Urban Drainage Team

Flood Risk Management & Urban Drainage Team

Children & Youth Play Area Consultee

Flood Risk Management & Urban Drainage Team

LBS Environmental Protection Team

LBS Community Infrastructure Team

LBS Transport Policy Team

LBS Design And Conservation Team [Formal Consultation]

LBS Local Economy

LBS Ecology Officer

LBS Planning Enforcement Team

LBS Highways Development & Management

Flood Risk Management & Urban Drainage Team

LBS Urban Forester

LBS Waste Management Team

Flood Risk Management & Urban Drainage Team

LBS Highways Development & Management

LBS Waste Management Team

LBS Waste Management Team  
LBS Environmental Protection Team  
LBS Environmental Protection Team  
LBS Archaeologist  
LBS Ecology Officer  
LBS Transport Policy Team  
LBS Highways Development & Management  
LBS Waste Management Team  
Flood Risk Management & Urban Drainage Team  
LBS Planning Policy [Formal Consultation] - General  
LBS Archaeologist  
LBS Community Infrastructure Team  
LBS Design And Conservation Team [Formal Consultation]  
LBS Local Economy  
LBS Ecology Officer  
LBS Planning Enforcement Team  
LBS Environmental Protection Team  
LBS Highways Development & Management  
Children & Youth Play Area Consultee  
LBS Planning Policy [Formal Consultation] - General  
Flood Risk Management & Urban Drainage Team  
LBS Transport Policy Team  
LBS Urban Forester  
LBS Waste Management Team

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

Environment Agency  
Greater London Authority  
London Fire & Emergency Planning Authority  
Natural England - London Region & South East Region

Metropolitan Police Service (Designing Out Crime)

Transport For London

Thames Water

Environment Agency

Environment Agency

Greater London Authority

London Fire & Emergency Planning Authority

Natural England - London Region & South East Region

Metropolitan Police Service (Designing Out Crime)

Transport For London

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

76 Elim Estate Weston Street London

86 Elim Estate Weston Street London

Flat 63 Eastwell House Weston Street

105 Elim Estate Weston Street London

Apartment 78 Taper Building 120  
Weston Street

Apartment 58 Taper Building 175 Long  
Lane

132 Weston Street London Southwark

39 Elim Estate Weston Street London

Flat 2 195 Long Lane London

Flat 2 Sadlers Court 30A Wilds Rents

Apartment 3 Calico House 199 Long  
Lane

Flat 5 Thurnham House Law Street

Flat 11 Wrotham House Law Street

Flat 17 Shalford House Law Street

Flat 12 Shalford House Law Street

5 Graduate Place London Southwark

78 Elim Estate Weston Street London

67 Elim Estate Weston Street London

Flat 38 Eastwell House Weston Street

Flat 26 Eastwell House Weston Street

Flat 18 Eastwell House Weston Street

Flat 17 Godstone House Pardoners Street

55 Rothsay Street London Southwark

Flat 18 Chartham House Weston Street

3 Elim Estate Weston Street London

41 Rothsay Street London Southwark

39 Rothsay Street London Southwark

21 Rothsay Street London Southwark

44 Rothsay Street London Southwark

38 Rothsay Street London Southwark

93 Elim Estate Weston Street London

130 Weston Street London Southwark

Office 17 30B Wilds Rents London

122 Weston Street London Southwark

Apartment 23 Taper Building 175 Long  
Lane

Apartment 15 Taper Building 175 Long Lane

Apartment 77 Taper Building 120 Weston Street

Apartment 27 Taper Building 175 Long Lane

Flat 33 Sadlers Court 30A Wilds Rents

Flat 24 Sadlers Court 30A Wilds Rents

Apartment 10 Calico House 199 Long Lane

Apartment 5 Calico House 199 Long Lane

Flat 3 195 Long Lane London

Apartment 9 208 Long Lane London

Flat 2 Tangerine House 119 Weston Street

Unit K 175 Long Lane London

211 Long Lane London Southwark

52 Elim Estate Weston Street London

Flat 40 Eastwell House Weston Street

Apartment 91 Taper Building 120 Weston Street

Flat 22 Tangerine House 176 Long Lane

Apartment 86 Taper Building 120 Weston Street

6 Cooperage House 202 Long Lane London

Apartment 4 Taper Building 175 Long Lane

Flat 69 Eastwell House Weston Street

Flat 30 Eastwell House Weston Street

Flat 13 Kemsing House Weston Street

Flat 7 Seal House Weston Street

Flat 6 Thurnham House Law Street

Flat 8 Godstone House Pardoners Street

Flat 16 Godstone House Pardoners Street

Flat 3 Chartham House Weston Street

33 Elim Estate Weston Street London

Unit 5A 20 Wilds Rents London

Decima Studio 17 Decima Street London

Apartment 95 Taper Building 120 Weston Street

Apartment 85 Taper Building 120 Weston Street

98 Elim Estate Weston Street London

Flat 72 Eastwell House Weston Street

Flat 49 Eastwell House Weston Street

Apartment 66 Taper Building 120 Weston Street

Apartment 7 117 Weston Street London

Flat 4 Chartham House Weston Street

71 Elim Estate Weston Street London

48 Elim Estate Weston Street London

Apartment 8 208 Long Lane London

Flat 18 Sadlers Court 30A Wilds Rents

Unit 8C 20 Wilds Rents London

Flat 4 Thurnham House Law Street

18A Wilds Rents London Southwark

124A Weston Street London Southwark

Flat 27 Shalford House Law Street

Flat 20 Shalford House Law Street

118 Elim Estate Weston Street London

116 Elim Estate Weston Street London

Flat 33 Eastwell House Weston Street

Flat 32 Eastwell House Weston Street

54 Decima Street London Southwark

52 Decima Street London Southwark

48 Decima Street London Southwark

Flat 1 Kemsing House Weston Street

Flat 1 Godstone House Pardoner Street

Flat 14 Chartham House Weston Street

50 Elim Estate Weston Street London

47 Elim Estate Weston Street London

43 Elim Estate Weston Street London

32 Elim Estate Weston Street London

23 Elim Estate Weston Street London

8 Elim Estate Weston Street London

Flat 12 Kemsing House Weston Street

Flat 30 Chartham House Weston Street

87 Elim Estate Weston Street London

126 Weston Street London Southwark

Apartment 89 Taper Building 120 Weston Street

Apartment 18 Taper Building 175 Long Lane

Office 11 30B Wilds Rents London

Apartment 94 Taper Building 120 Weston Street

Apartment 65 Taper Building 120 Weston Street

Unit B 120 Weston Street London

Apartment 47 Taper Building 175 Long Lane

5 Cooperage House 202 Long Lane London

Apartment 12 117 Weston Street London

Apartment 10 117 Weston Street London

Apartment 2 117 Weston Street London

Apartment 3 208 Long Lane London

Flat 7 Tangerine House 119 Weston Street

Flat 23 Tangerine House 176 Long Lane

Flat 5C 20 Wilds Rents London

Unit G 175 Long Lane London

Unit C 175 Long Lane London

Visual Response Ltd 20 Wilds Rents London

Apartment 64 Taper Building 120 Weston Street

30 Wilds Rents London Southwark

40 Rothsay Street London Southwark

124 Weston Street London Southwark

30 Elim Estate Weston Street London

24 Elim Estate Weston Street London

18 Elim Estate Weston Street London

Flat 7 Kemsing House Weston Street

Flat 3 Eastwell House Weston Street

Flat 24 Eastwell House Weston Street

Flat 17 Eastwell House Weston Street

Flat 15 Eastwell House Weston Street

Apartment 88 Taper Building 120 Weston Street

89 Elim Estate Weston Street London

Flat 67 Eastwell House Weston Street

74 Elim Estate Weston Street London

45 Elim Estate Weston Street London

42 Elim Estate Weston Street London

Flat 11 Tangerine House 119 Weston Street

Apartment 8 Calico House 199 Long Lane

Apartment 6 208 Long Lane London

1 Atlantic Business Centre 20-30 Wilds Rents London

Flat 2 Thurnham House Law Street

Flat 11 Thurnham House Law Street

Flat 7 Wrotham House Law Street

Flat 13 Wrotham House Law Street

Flat 9 Shalford House Law Street

Flat 8 Shalford House Law Street

Flat 34 Shalford House Law Street

Flat B 218 Long Lane London

70 Elim Estate Weston Street London

64 Elim Estate Weston Street London

61 Elim Estate Weston Street London

Flat 6 Eastwell House Weston Street

Flat 26 Chartham House Weston Street

66 Decima Street London Southwark

Flat 58 Eastwell House Weston Street

Flat 48 Eastwell House Weston Street

Flat 21 Eastwell House Weston Street

Flat 16 Eastwell House Weston Street

190 Long Lane London Southwark

Flat 9 Seal House Weston Street

Flat 2 Seal House Weston Street

Flat 7 Godstone House Pardoner Street

Flat 22 Godstone House Pardoner Street

Flat 14 Godstone House Pardoner Street

35 Elim Estate Weston Street London

26 Elim Estate Weston Street London

Flat 6 Kemsing House Weston Street

Flat 3 Kemsing House Weston Street

27 Rothsay Street London Southwark

Flat 28 Chartham House Weston Street

Apartment 2 Taper Building 175 Long Lane

Unit F 120 Weston Street London

Apartment 54 Taper Building 175 Long Lane

Apartment 52 Taper Building 175 Long Lane

Apartment 40 Taper Building 175 Long Lane

Apartment 35 Taper Building 175 Long Lane

Apartment 33 Taper Building 175 Long Lane

Apartment 31 Taper Building 175 Long Lane

Flat 29 Sadlers Court 30A Wilds Rents

Apartment 3 117 Weston Street London

Unit 5 20 Wilds Rents London

Flat 32 Sadlers Court 30A Wilds Rents

Flat 27 Sadlers Court 30A Wilds Rents

Flat 8 Sadlers Court 30A Wilds Rents

Flat 3 Sadlers Court 30A Wilds Rents

Unit 2 Calico House 199 Long Lane

Flat 13 195 Long Lane London

Flat 11 195 Long Lane London

Flat 10 Tangerine House 119 Weston Street

Unit B 175 Long Lane London

207 Long Lane London Southwark

34 Elim Estate Weston Street London

69 Elim Estate Weston Street London

Apartment 11 117 Weston Street London

88 Elim Estate Weston Street London

Flat 11 Shalford House Law Street

126A Weston Street London Southwark

Flat 3 Wrotham House Law Street

Flat 33 Shalford House Law Street

51 Rothsay Street London Southwark

Flat 12 Thurnham House Law Street

Flat 27 Chartham House Weston Street

22 Elim Estate Weston Street London

Flat 24 Chartham House Weston Street

Flat 22 Chartham House Weston Street

Flat 15 Chartham House Weston Street

Flat 41 Eastwell House Weston Street

Office 13 30B Wilds Rents London

Apartment 21 Taper Building 175 Long Lane

Apartment 19 Taper Building 175 Long Lane

Flat 70 Eastwell House Weston Street

100 Elim Estate Weston Street London

218 Long Lane London Southwark

Apartment 71 Taper Building 120 Weston Street

Flat 9 Tangerine House 119 Weston Street

Flat 28 Sadlers Court 30A Wilds Rents

Flat 20 Sadlers Court 30A Wilds Rents

Flat 15 Sadlers Court 30A Wilds Rents

19 Wilds Rents London Southwark

31 Wilds Rents London Southwark

Flat 1 Thurnham House Law Street

Flat 32 Shalford House Law Street

Flat 18 Shalford House Law Street

Flat 10 Shalford House Law Street

Flat 1 Shalford House Law Street

2 Graduate Place London Southwark

113 Elim Estate Weston Street London

101 Elim Estate Weston Street London

79 Elim Estate Weston Street London

66 Elim Estate Weston Street London

Flat 45 Eastwell House Weston Street

Flat 43 Eastwell House Weston Street

Flat 11 Eastwell House Weston Street

46 Decima Street London Southwark

Flat 73 Eastwell House Weston Street

Flat 68 Eastwell House Weston Street

Flat 19 Seal House Weston Street

Flat 10 Chartham House Weston Street

Flat 17 Seal House Weston Street

Flat 2 Godstone House Pardonner Street

Flat 11 Godstone House Pardonner Street

13 Elim Estate Weston Street London

Flat 9 Kemsing House Weston Street

53 Rothsay Street London Southwark

47 Rothsay Street London Southwark

35 Rothsay Street London Southwark

Flat 6 Chartham House Weston Street

Flat 29 Chartham House Weston Street

Apartment 20 Taper Building 175 Long Lane

Apartment 13 Taper Building 175 Long Lane

Office 15 30B Wilds Rents London

Apartment 87 Taper Building 120 Weston Street

Apartment 69 Taper Building 120 Weston Street

3 Cooperage House 202 Long Lane London

Apartment 67 Taper Building 120 Weston Street

Unit E 120 Weston Street London

Apartment 41 Taper Building 175 Long Lane

Apartment 6 117 Weston Street London

3 Decima Studio 17 Decima Street London

First Floor Unit 5B 20-30 Wilds Rents London

Flat 19 Sadlers Court 30A Wilds Rents

Flat 12 Sadlers Court 30A Wilds Rents

Flat 10 195 Long Lane London

Flat 16 Tangerine House 119 Weston Street

Flat 13 Tangerine House 119 Weston Street

Flat 21 Tangerine House 176 Long Lane

Unit L 175 Long Lane London

Unit E 175 Long Lane London

Flat 10 Kemsing House Weston Street

Apartment 57 Taper Building 175 Long Lane

Flat 15 Wrotham House Law Street

Apartment 10 Taper Building 175 Long Lane

45 Rothsay Street London Southwark

Flat 1 Eastwell House Weston Street

Apartment 61 Taper Building 120 Weston Street

Apartment 49 Taper Building 175 Long Lane

Flat 7 Shalford House Law Street

9 Elim Estate Weston Street London

11 Elim Estate Weston Street London

Flat 1 Tangerine House 119 Weston Street

37 Rothsay Street London Southwark

Flat 8A 20-30 Wilds Rents London

4A Atlantic Business Centre 20-30 Wilds Rents London

Studio B Unit 12 20-30 Wilds Rents London

Unit 4B 20-30 Wilds Rents London

Apartment 18 117 Weston Street London

210-216 Long Lane London Southwark

Flat 8B 20-30 Wilds Rents London

22 Wilds Rents London Southwark

171 Long Lane London Southwark

Flat 25 Chartham House Weston Street

103 Elim Estate Weston Street London

Apartment 30 Taper Building 175 Long Lane

Flat 39 Eastwell House Weston Street

1 Cooperage House 202 Long Lane London

Flat 4 Shalford House Law Street

4 Cooperage House 202 Long Lane London

18B Wilds Rents London Southwark

Flat 2 Kemsing House Weston Street

Flat 11 Kemsing House Weston Street

Flat 44 Eastwell House Weston Street

Apartment 51 Taper Building 175 Long Lane

Apartment 48 Taper Building 175 Long Lane

Apartment 46 Taper Building 175 Long Lane

Unit 1 Calico House 199 Long Lane

Flat 12 Eastwell House Weston Street

Apartment 14 208 Long Lane London

Apartment 7 208 Long Lane London

Flat 1 220A Long Lane London

Apartment 11 Calico House 199 Long Lane

94 Elim Estate Weston Street London

91 Elim Estate Weston Street London

128 Weston Street London Southwark

4 Wilds Rents London Southwark

Flat 2 220A Long Lane London

Flat 14 195 Long Lane London

Flat 1 195 Long Lane London

Apartment 2 208 Long Lane London

Flat 12 Tangerine House 119 Weston Street

Flat 5 Tangerine House 119 Weston Street

Flat 19 Tangerine House 176 Long Lane

2 Wilds Rents London Southwark

Unit F 175 Long Lane London

Unit D 175 Long Lane London

8C Wilds Rents London Southwark

205 Long Lane London Southwark

Store Elim Estate Weston Street

23 Rothsay Street London Southwark

Flat 53 Eastwell House Weston Street

99 Elim Estate Weston Street London

Apartment 15 208 Long Lane London

Apartment 70 Taper Building 120 Weston Street

Flat 3 Shalford House Law Street

Flat 14 Shalford House Law Street

Flat 10 Seal House Weston Street

60 Decima Street London Southwark

Flat 30 Sadlers Court 30A Wilds Rents

Flat 9 Sadlers Court 30A Wilds Rents

196 Long Lane London Southwark

92 Elim Estate Weston Street London

Basement And Ground Floor Flat 220 Long Lane London

Office 12 30B Wilds Rents London

Apartment 25 Taper Building 175 Long Lane

62 Elim Estate Weston Street London

109 Elim Estate Weston Street London

Flat 14 Seal House Weston Street

Flat 3 Godstone House Pardoners Street

Flat 15 Godstone House Pardoners Street

40 Elim Estate Weston Street London

Flat 23 Sadlers Court 30A Wilds Rents

Apartment 39 Taper Building 175 Long Lane

62 Decima Street London Southwark

Flat 65 Eastwell House Weston Street

Flat 5 Eastwell House Weston Street

Flat 5 Seal House Weston Street

Flat 6 Wrotham House Law Street

Flat 14 Wrotham House Law Street

Flat 31 Shalford House Law Street

Flat 26 Shalford House Law Street

Flat 1 Wrotham House Law Street

Flat 10 Thurnham House Law Street

Flat 9 Wrotham House Law Street

Flat 18 Seal House Weston Street

Flat 20 Godstone House Pardoners Street

4 Graduate Place London Southwark

Flat 15 Seal House Weston Street

Flat 29A Chartham House Weston Street

Flat 13 Godstone House Pardon Street

1 Graduate Place London Southwark

Flat 20 Seal House Weston Street

27 Elim Estate Weston Street London

15 Elim Estate Weston Street London

1 Elim Estate Weston Street London

Flat 17 Chartham House Weston Street

Flat 1 Chartham House Weston Street

36 Elim Estate Weston Street London

12 Elim Estate Weston Street London

Flat 2 Chartham House Weston Street

Flat 5 Kemsing House Weston Street

Apartment 32 Taper Building 175 Long Lane

Apartment 29 Taper Building 175 Long Lane

Apartment 26 Taper Building 175 Long Lane

Office 10 30B Wilds Rents London

Office 20 30B Wilds Rents London

Apartment 37 Taper Building 175 Long Lane

Apartment 16 Taper Building 175 Long Lane

7 Cooperage House 202 Long Lane London

95 Elim Estate Weston Street London

84 Elim Estate Weston Street London

108 Elim Estate Weston Street London

Unit D 120 Weston Street London

Apartment 56 Taper Building 175 Long Lane

Apartment 14 117 Weston Street London

Apartment 1 117 Weston Street London

77 Elim Estate Weston Street London

65 Elim Estate Weston Street London

54 Elim Estate Weston Street London

51 Elim Estate Weston Street London

Flat 4 Tangerine House 119 Weston Street

Flat 31 Sadlers Court 30A Wilds Rents

Flat 17 Tangerine House 119 Weston Street

65 Decima Street London Southwark

Flat 8 Wrotham House Law Street

Flat 25 Shalford House Law Street

104 Elim Estate Weston Street London

75 Elim Estate Weston Street London

72 Elim Estate Weston Street London

Flat 20 Eastwell House Weston Street

Flat 54 Eastwell House Weston Street

Flat 35 Eastwell House Weston Street

Flat 71 Eastwell House Weston Street

Flat 66 Eastwell House Weston Street

Flat 8 Seal House Weston Street

Flat 13 Seal House Weston Street

Flat 6 Godstone House Pardon Street

Flat 21 Godstone House Pardon Street

Flat 12 Godstone House Pardon Street

Flat 23 Chartham House Weston Street

Flat 20 Chartham House Weston Street

Flat 13 Chartham House Weston Street

Flat 11 Chartham House Weston Street

53 Elim Estate Weston Street London

44 Elim Estate Weston Street London

31 Elim Estate Weston Street London

10 Elim Estate Weston Street London

Flat 15 Kemsing House Weston Street

42 Rothsay Street London Southwark

Flat 5 Chartham House Weston Street

Apartment 22 Taper Building 175 Long Lane

Office 21 30B Wilds Rents London

Office 18 To 19 30B Wilds Rents London

Office 2 30B Wilds Rents London

Apartment 92 Taper Building 120 Weston Street

Apartment 72 Taper Building 120 Weston Street

Apartment 45 Taper Building 175 Long Lane

Flat 22 Sadlers Court 30A Wilds Rents

Flat 4 Sadlers Court 30A Wilds Rents

Flat 1 Sadlers Court 30A Wilds Rents

Apartment 9 Calico House 199 Long Lane

Apartment 4 Calico House 199 Long Lane

Apartment 10 208 Long Lane London

Apartment 1 208 Long Lane London

Office 7 30B Wilds Rents London

Office 1 30B Wilds Rents London

Flat 55 Eastwell House Weston Street

Flat 7 Eastwell House Weston Street

Flat 7 Chartham House Weston Street

Unit 13 Studio C 20-30 Wilds Rents London

68 Elim Estate Weston Street London

226 Long Lane London Southwark

Flat 8 Thurnham House Law Street

34 Wilds Rents London Southwark

Flat 30 Shalford House Law Street

Flat 22 Shalford House Law Street

Flat 15 Shalford House Law Street

3 Graduate Place London Southwark

58 Decima Street London Southwark

Flat A 218 Long Lane London

85 Elim Estate Weston Street London

81 Elim Estate Weston Street London

63 Elim Estate Weston Street London

64 Decima Street London Southwark

Flat 64 Eastwell House Weston Street

Flat 25 Eastwell House Weston Street

Flat 56 Eastwell House Weston Street

Flat 50 Eastwell House Weston Street

Flat 36 Eastwell House Weston Street

Flat 19 Eastwell House Weston Street

Flat 11 Seal House Weston Street

Flat 21 Chartham House Weston Street

Flat 16 Chartham House Weston Street

46 Elim Estate Weston Street London

37 Elim Estate Weston Street London

28 Elim Estate Weston Street London

21 Elim Estate Weston Street London

14 Elim Estate Weston Street London

Flat 4 Kemsing House Weston Street

43 Rothsay Street London Southwark

29 Rothsay Street London Southwark

36 Rothsay Street London Southwark

Apartment 12 Taper Building 175 Long Lane

Apartment 8 Taper Building 175 Long Lane

Apartment 7 Taper Building 175 Long Lane

Apartment 82 Taper Building 120 Weston Street

Apartment 81 Taper Building 120 Weston Street

Apartment 74 Taper Building 120 Weston Street

Unit C 120 Weston Street London

Apartment 50 Taper Building 175 Long Lane

Apartment 43 Taper Building 175 Long Lane

Apartment 28 Taper Building 175 Long Lane

Apartment 9 117 Weston Street London

Flat 35 Sadlers Court 30A Wilds Rents

Flat 25 Sadlers Court 30A Wilds Rents

Flat 14 Sadlers Court 30A Wilds Rents

Flat 6 Sadlers Court 30A Wilds Rents

Apartment 4 208 Long Lane London

Unit J 175 Long Lane London

Flat 57 Eastwell House Weston Street

Flat 52 Eastwell House Weston Street

Apartment 83 Taper Building 120 Weston Street

192 Long Lane London Southwark

Apartment 76 Taper Building 120 Weston Street

Apartment 68 Taper Building 120 Weston Street

Apartment 63 Taper Building 120 Weston Street

Apartment 4 117 Weston Street London

59 Elim Estate Weston Street London

Flat 20 Tangerine House 176 Long Lane

Flat 36 Sadlers Court 30A Wilds Rents

Flat 6 Tangerine House 119 Weston Street

Flat 2 Wrotham House Law Street

Flat 26 Sadlers Court 30A Wilds Rents

Flat 24A Chartham House Weston Street

Flat 56A Eastwell House Weston Street

Flat 7 Thurnham House Law Street

Flat 5 Shalford House Law Street

Flat 35 Shalford House Law Street

Flat 28 Shalford House Law Street

18C Wilds Rents London Southwark

83 Elim Estate Weston Street London

115 Elim Estate Weston Street London

110 Elim Estate Weston Street London

107 Elim Estate Weston Street London

82 Elim Estate Weston Street London

Flat 62 Eastwell House Weston Street

Flat 8 Eastwell House Weston Street

Flat 47 Eastwell House Weston Street

Flat 42 Eastwell House Weston Street

Flat 4 Eastwell House Weston Street

Flat 10 Eastwell House Weston Street

194 Long Lane London Southwark

Flat 6 Seal House Weston Street

Flat 16 Seal House Weston Street

Flat 19 Godstone House Pardoner Street

49 Elim Estate Weston Street London

38 Elim Estate Weston Street London

29 Elim Estate Weston Street London

25 Elim Estate Weston Street London

2 Elim Estate Weston Street London

17 Elim Estate Weston Street London

Flat 14 Kemsing House Weston Street

Flat 9 Chartham House Weston Street

Apartment 5 Taper Building 175 Long Lane

Office 14 30B Wilds Rents London

Office 9 30B Wilds Rents London

Office 8 30B Wilds Rents London

Apartment 79 Taper Building 120 Weston Street

Apartment 75 Taper Building 120 Weston Street

Apartment 60 Taper Building 175 Long Lane

Apartment 38 Taper Building 175 Long Lane

Apartment 36 Taper Building 175 Long Lane

2 Cooperage House 202 Long Lane London

Apartment 5 117 Weston Street London

Apartment 7 Calico House 199 Long Lane

Apartment 13 208 Long Lane London

Apartment 5 208 Long Lane London

Flat 5 195 Long Lane London

Flat 5D 20 Wilds Rents London

Flat 5B 20 Wilds Rents London

Unit 1 175 Long Lane London

Flat 3 Tangerine House 119 Weston Street

Apartment 9 Taper Building 175 Long Lane

2 Atlantic Business Centre 20-30 Wilds Rents London

Units 5 And 5A Decima Studio 17 Decima Street

46 Rothsay Street London Southwark

1 Decima Studio 17 Decima Street London

16 Wilds Rents London Southwark

224 Long Lane London Southwark

Apartment 44 Taper Building 175 Long Lane

Flat 7 195 Long Lane London

Flat 12 Chartham House Weston Street

20 Elim Estate Weston Street London

Flat 9 Eastwell House Weston Street

Flat 8 Tangerine House 119 Weston Street

Ground Floor Flat 132 Weston Street London

56 Elim Estate Weston Street London

Apartment 24 Taper Building 175 Long Lane

Flat 19 Chartham House Weston Street

33 Wilds Rents London Southwark

Apartment 11 208 Long Lane London

Flat 10 Sadlers Court 30A Wilds Rents

Flat 4 195 Long Lane London

Units 9 And 9A Argent House Wilds Rents

Flat 13 Sadlers Court 30A Wilds Rents

Flat 5 Sadlers Court 30A Wilds Rents

Flat 7 Sadlers Court 30A Wilds Rents

First Floor Flat 132 Weston Street London

134 Weston Street London Southwark

6 Graduate Place London Southwark

Flat 37 Sadlers Court 30A Wilds Rents

Flat 17 Sadlers Court 30A Wilds Rents

Office 22 30B Wilds Rents London

Office 5 30B Wilds Rents London

Apartment 90 Taper Building 120 Weston Street

7 Wilds Rents London Southwark

50 Decima Street London Southwark

56 Decima Street London Southwark

Flat 15 195 Long Lane London

Flat 12 195 Long Lane London

Flat 9 195 Long Lane London

Studio A Unit 13 20-30 Wilds Rents London

Basement And Ground Floor 222 Long Lane London

Unit 13B 24-28 Wilds Rents London

5 Elim Estate Weston Street London

Flat 8 Kemsing House Weston Street

Flat 32 Chartham House Weston Street

Apartment 16 117 Weston Street London

Apartment 93 Taper Building 120 Weston Street

Apartment 17 117 Weston Street London

Apartment 1 Taper Building 175 Long Lane

Apartment 11 Taper Building 175 Long Lane

Apartment 6 Taper Building 175 Long Lane

Apartment 3 Taper Building 175 Long Lane

Second Floor Flat 132 Weston Street London

Apartment 2 Calico House 199 Long Lane

Think Apartment Hotel 201-211 Long Lane London

Flat 3 Seal House Weston Street

Apartment 15 117 Weston Street London

Flat 4 Godstone House Pardoner Street

Flat 2 Shalford House Law Street

49 Rothsay Street London Southwark

48 Rothsay Street London Southwark

Flat 6 Shalford House Law Street

Apartment 73 Taper Building 120 Weston Street

4 Elim Estate Weston Street London

Flat 9 Thurnham House Law Street

Apartment 6 Calico House 199 Long Lane

120 Elim Estate Weston Street London

Flat 37 Eastwell House Weston Street

Flat 23 Shalford House Law Street

Flat 13 Shalford House Law Street

Apartment 2A Calico House 199 Long Lane

Flat 16 Shalford House Law Street

Flat 19 Shalford House Law Street

Flat 21 Shalford House Law Street

Apartment 8 117 Weston Street London

Flat 12 Seal House Weston Street

Unit A 175 Long Lane London

119 Elim Estate Weston Street London

Flat 12 Wrotham House Law Street

Flat 10 Godstone House Pardoner Street

25 Rothsay Street London Southwark

7 Elim Estate Weston Street London  
 Apartment 42 Taper Building 175 Long Lane  
 Flat 34 Eastwell House Weston Street  
 Office 23 30B Wilds Rents London  
 Apartment 34 Taper Building 175 Long Lane  
 Office 4 30B Wilds Rents London  
 Flat 60 Eastwell House Weston Street  
 117 Elim Estate Weston Street London  
 111 Elim Estate Weston Street London  
 Apartment 80 Taper Building 120 Weston Street  
 Unit A 120 Weston Street London  
 Apartment 53 Taper Building 175 Long Lane  
 Flat 34 Sadlers Court 30A Wilds Rents  
 Flat 14 Tangerine House 119 Weston Street  
 Apartment 12 208 Long Lane London  
 9-10 Atlantic Business Centre 20-30 Wilds Rents London  
 32 Wilds Rents London Southwark  
 Flat 5 Wrotham House Law Street  
 Flat 4 Wrotham House Law Street  
 Flat 10 Wrotham House Law Street  
 Flat 24 Shalford House Law Street  
 122A Weston Street London Southwark  
 121 Elim Estate Weston Street London  
 112 Elim Estate Weston Street London  
 106 Elim Estate Weston Street London  
 60 Elim Estate Weston Street London  
 58 Elim Estate Weston Street London  
 57 Elim Estate Weston Street London  
 Flat 61 Eastwell House Weston Street  
 Flat 59 Eastwell House Weston Street  
 Flat 51 Eastwell House Weston Street  
 Flat 29 Eastwell House Weston Street  
 Flat 28 Eastwell House Weston Street  
 Flat 14 Eastwell House Weston Street  
 19 Elim Estate Weston Street London  
 Flat 4 Seal House Weston Street  
 Flat 1 Seal House Weston Street  
 Flat 9 Godstone House Pardoner Street  
 41 Elim Estate Weston Street London  
 6 Elim Estate Weston Street London  
 16 Elim Estate Weston Street London  
 33 Rothsay Street London Southwark  
 Flat 33 Chartham House Weston Street  
 97 Elim Estate Weston Street London  
 96 Elim Estate Weston Street London  
 90 Elim Estate Weston Street London  
 Apartment 17 Taper Building 175 Long Lane  
 Office 6 30B Wilds Rents London  
 Office 3 30B Wilds Rents London  
 Apartment 84 Taper Building 120 Weston Street  
 Apartment 62 Taper Building 120 Weston Street  
 Apartment 59 Taper Building 175 Long Lane  
 Apartment 55 Taper Building 175 Long Lane  
 Apartment 19 117 Weston Street London  
 Apartment 13 117 Weston Street London  
 3A Decima Studio 17 Decima Street London

Flat 21 Sadlers Court 30A Wilds Rents  
Flat 16 Sadlers Court 30A Wilds Rents  
Flat 11 Sadlers Court 30A Wilds Rents  
Flat 8 195 Long Lane London  
Flat 6 195 Long Lane London  
Flat 15 Tangerine House 119 Weston Street  
Flat 23 Eastwell House Weston Street  
Flat 18 Tangerine House 176 Long Lane  
Unit H 175 Long Lane London  
209 Long Lane London Southwark  
80 Elim Estate Weston Street London  
73 Elim Estate Weston Street London  
55 Elim Estate Weston Street London  
Flat 8 Chartham House Weston Street  
Flat 13 Eastwell House Weston Street

Flat 42A Eastwell House Weston Street  
Flat 29 Shalford House Law Street  
Flat 3 Thurnham House Law Street  
Flat 5 Godstone House Pardoner Street  
Flat 18 Godstone House Pardoner Street  
31 Rothsay Street London Southwark  
Flat 31 Chartham House Weston Street  
Flat 46 Eastwell House Weston Street  
Flat 31 Eastwell House Weston Street  
Flat 27 Eastwell House Weston Street  
Flat 22 Eastwell House Weston Street  
Flat 2 Eastwell House Weston Street  
Office 16 30B Wilds Rents London  
Apartment 14 Taper Building 175 Long Lane

**APPENDIX 3****Consultation responses received****Internal services**

LBS Flood Risk Management & Urban Drain  
LBS Flood Risk Management & Urban Drain  
LBS Flood Risk Management & Urban Drain  
LBS Children and Youth Play Areas  
LBS Flood Risk Management & Urban Drain  
LBS Environmental Protection  
LBS Community Infrastructure Levy Team  
LBS Transport Policy  
LBS Design & Conservation Team [Formal]  
LBS Local Economy  
LBS Ecology  
LBS Planning Enforcement  
LBS Highways Development & Management  
LBS Flood Risk Management & Urban Drain  
LBS Urban Forester  
LBS Waste Management  
LBS Flood Risk Management & Urban Drain  
LBS Highways Development & Management  
LBS Waste Management  
LBS Waste Management  
LBS Environmental Protection  
LBS Archaeology  
LBS Ecology  
LBS Transport Policy  
LBS Archaeology  
LBS Community Infrastructure Levy Team

LBS Design & Conservation Team [Formal]

LBS Ecology

LBS Planning Policy

LBS Urban Forester

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

Environment Agency

Great London Authority

London Fire & Emergency Planning Authority

Natural England - London & South East Region

Metropolitan Police Service

Transport for London

Thames Water

Transport for London

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

83 Shirley way Shirley CR0 8PL

50 Reverdy Road Bermondsey London

19 Biggin Hill Road Bromley br2 9pq

35 Simla House London SE1

3rd Floor 207 Regent Street, London  
W1B 3HH

Hanover Park House 14-16 Hanover  
Park Peckham

142 Cromwell Road London SW74EF

London

43 Weston Street Bermondsey SE1 4NX

69 Eastwell House Weston Street SE1  
4DJ

28 Grove Street Leicester LE4 8ZU

26 Leathermarket Street Southwark se1  
4ex

16 Chestnut Rd London SE27 9LF

24 Aland Court Finland Street London

26 Leathermarket Market Street  
Southwark SE1 3HN

Flat 24 Joyce newman house Deverell  
street London

26 Leathermarket Market Street

13 Riley Ave Herne Bay CT6 8AT

Southwark SE1 3HN

26 Leathermarket Street Southwark se1  
4ex

16 Chestnut Rd London SE27 9LF

39 Ardgown Road Catford se17 4hu

18 Crown Lane Bromley BR29PQ

171 Ardgowan Road Catford London

142 Cromwell Road London SW74EF

26 Joyce Newman London se1 5ex

37 Symington House London SE1 4EH

19, Joyce Newman House London SE1 4EX

62 Maran Way Thamesmead SE25 5XE

27 Deverell Street London

5 Pembridge Square London W2 4EG

252 Jamaica Street Bermondsey SE16 4BG

43 Bandcourt London SE25 6ES

93 Elim Crown Lane London

87 Balfour Street London SE17 1PB

Flat 22, Eastwell House Weston street London

192 Long Lane London SE1 4PZ

17 Tangerine House 119 Weston Street London

43 elim estate London SE1 4DA

4 Wild's Rents London Se1 4qg

224 Long Lane London se14qb

43 Elim Estate Weston Street London

56 Elim Estate Weston Street London

120 Elim Estate Weston Street London

Apartment 11 Calico House 199 Long Lane London

199 Long Lane Apartment 6 Calico House London

217 Long Lane, 8 Glenrose Court 8 Glenrose Court London

120 Elim Estate Weston Street London

208 Long Lane 2 London

Apartment 10, Calico House, 199 Long Lane 199 Long Lane LONDON

48 Ivanhoe Drive Kenton Harrow, Middlesex

Flat 4 199 Long Lane London

4 Wild's Rents London SE1 4QG

4 Wild's Rents London SE1 4QG

Flat 2.03 5 Lillie Square London

43 elim estate Weston street London

29 Whites Grounds Estate Whites Grounds London

Flat 15 195 Long Lane London

Flat 16, Tangerine House 119 Weston Street London

Apartment 11 Calico House 199 Long Lane

Flat 17 Tangerine House 119 Weston Street

17 Elim estate London Se1 4by

Long Lane 199, Apartment 6 Calico House London SE14PN

Apartment 11, Calico House 199 Long Lane London

87 Balfour Street London SE17 1PB

Calico House 199 Long Lane London

Apartment 4, Calico House 199 Long Lane London

56 Elim Estate Weston Street London

Flat 17 119 Weston Street London

Weston Street Weston Street London

Flat 17 119 Weston Street London

14 Crown Lane Bromley BR2 9PQ

91 Parish Lane Penge se20 7nr

6 Joseph Lancaster Terrace London Se1 4gx

97 Merton London SW18 5SY

76 Crosby Row London SE1 3PT

171 Ardgowan Road Catford London

67 Deverell Street London SE1 4EX

7 Marklake Court 95 Weston st London

57 Blakehall Road Carshalton SM5 3EZ

10 Joseph Lancaster Bermondsey London

19 Heldar Court Kipling Estate London

34 Hamilton Square Kipling Street London

4 Joyce Newman London SE1 3HN

Flat 6 Joyce Newman House London

12 Wordsworth Road London Se1 5tx

Flat 5 Inkworks Court 3 Bell Yard Mews London

Flat 2, 46d Bird in Bush Rd London SE15 6RW

1 Joyce Newman House Bermondsey SE1 4EX

33 Joyce Newman Deverell street London

21 Joyce Newman London se1 4ex

Flat 2 208 Long Lane London

Flat 5, 208 long lane London SE1 4QB

4 criterion mews London Se24 0dn

Flat 8, 208 Long Lane London SE1 4QB

Flat 12 Marklake Court 95 Weston Street London

18 Gwen Morris House London SE5 0AD

105 WHITES GROUNDS BERMONDSEY LONDON

15 Joyce Newman House Deverell Street London

208 Long Lane 208 Long Lane London

208 Long Lane London SE14QB

18 Gwen Morris Wyndham Road London

Basement flat, Wansey street London Se17 1jp

4 Tyers Estate Bermondsey Street Southwark

4 cooperage house 202 long lane london

Flat 21 Tanner House London

Flat 3 Quad Court Griggs Place Lond

**APPENDIX 4****Relevant planning history**

<b>Reference and Proposal</b>	<b>Status</b>
<b>20/AP/3616</b> The construction of 32 social rented homes across two separate buildings (16 flats each), along with the provision of community facilities, landscaping and associated development.	Application withdrawn 17/03/2022
<b>83/AP/1092</b> Court Yard Improvements 1-121 Elim Estate ( LBS Reg 1092-83 )	GRANT - Regulation 3/4 18/10/1983

**OPEN  
COMMITTEE:  
NOTE:**

## PLANNING COMMITTEE (SMALLER APPLICATIONS)

MUNICIPAL YEAR 2025-26

Original held in Constitutional Team; all amendments/queries to Beverley Olamijulo, Constitutional Team, Tel: 020 7525 7234

**OPEN**

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Councillor Jane Salmon (Vice-Chair)	1	
Councillor Sabina Emmanuel	1	
Councillor Sam Foster	1	
Councillor Nick Johnson	1	
Councillor David Parton	1	
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