

## Planning Committee (Smaller Applications)

Monday 8 December 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)

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Members of the committee are summoned to attend this meeting

**Althea Loderick**

Chief Executive

Date: 28 November 2025



## Planning Committee (Smaller Applications)

Monday 8 December 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 11 November 2025.	1 - 4
6. DEVELOPMENT MANAGEMENT	6.1. POTTERS FIELDS PARK, LONDON SE1 2SG	5 - 9
		10 - 58

Item No.	Title	Page No.
	<b>6.2. 10 GALLERY ROAD LONDON SOUTHWARK SE21 7AB</b>	59 - 91
	<b>6.3. LAND REAR 19-49 BUSH ROAD, LONDON, SE8 5AP</b>	92 - 220

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

**EXCLUSION OF PRESS AND PUBLIC**

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

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

Date: 28 November 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**.

<ol style="list-style-type: none"><li>(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.</li><li>(b) The applicant or applicant's agent.</li><li>(c) One representative for any supporters (who live within 100 metres of the development site).</li><li>(d) Ward councillor (spokesperson) from where the proposal is located.</li><li>(e) The members of the committee will then debate the application and consider the recommendation.</li></ol>
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**Note:** Members of the committee may question those who speak only on matters relevant to the roles and functions of the planning committee that are outlined in the constitution and in accordance with the statutory planning framework.

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

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

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

**Please note:**

Those wishing to speak at the meeting should notify the constitutional team by email at [ConsTeam@southwark.gov.uk](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  
Planning and Growth Directorate,  
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 Tuesday 11 November 2025 at 7.00 pm at Ground Floor Meeting Rooms - 160 Tooley Street, London SE1 2QH

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**PRESENT:** Councillor Cleo Soanes (Chair)  
Councillor Jane Salmon (Vice-Chair)  
Councillor Sabina Emmanuel  
Councillor Nick Johnson  
Councillor Richard Livingstone  
Councillor David Parton

**OFFICER SUPPORT:** Dennis Sangweme (Assistant Director, Development Management)  
Kamil Dolebski (Specialist Planning Lawyer)  
Agneta Kabele (Development Management)  
Tegan Blake (Development Management)  
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 6.1 - development management items
- Members' pack.

#### 4. DISCLOSURE OF INTERESTS AND DISPENSATIONS

None were disclosed.

#### 5. MINUTES

##### **RESOLVED:**

That the minutes for the Planning Committee (Smaller Applications) meeting held on 15 October 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.

The Chair proposed a variation in the running order so, item 6.2 was considered before 6.1.

##### 6.1 GROVE HOUSE, DULWICH COMMON, LONDON, SE21 7EZ

###### **Planning application reference 25/AP/2540**

Report: See pages 11 to 75 of the agenda pack and addendum pages 1 to 4.

###### **PROPOSAL**

*Demolition of the existing residential building and the erection of a two storey dwelling including ancillary garden / bike store, terracing, parking, hard and soft landscaping. (This application represents a departure of Policy P57 Open Space of Southwark Plan 2022 by virtue of construction of a replacement dwellinghouse on a different footprint).*

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

There were no objectors present at the meeting.

The applicant's agent 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.

There were no ward members present who wished to speak at the meeting.

A motion to grant the application subject to conditions and amended conditions set out in the officer's report, and the addendum 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 set out in the report and the amended conditions, outlined in the addendum report.

**6.2 CAMBERWELL OLD CEMETERY PUBLIC TOILETS, FOREST HILL ROAD, LONDON SE22 0RU**

**Planning application reference 25/AP/2540**

Report: See pages 76 to 94 of the agenda pack

**PROPOSAL**

*Replacement of the existing single storey temporary building providing public toilets within Camberwell Old Cemetery, with a new permanent single storey public toilet building, of the same size and on the same footprint. Includes associated groundworks and making good.*

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

There were no objectors present that wished to address the committee.

The applicant and the applicant's agent were not present at the meeting.

There were no supporters that lived within 100 metres, present at the meeting.

There were no ward members who wished to address the committee.

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

**RESOLVED:**

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

The meeting ended at 8.10 pm.

**CHAIR:**

**DATED:**

<b>Meeting Name:</b>	Planning Committee (Smaller Applications)
<b>Date:</b>	8 December 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

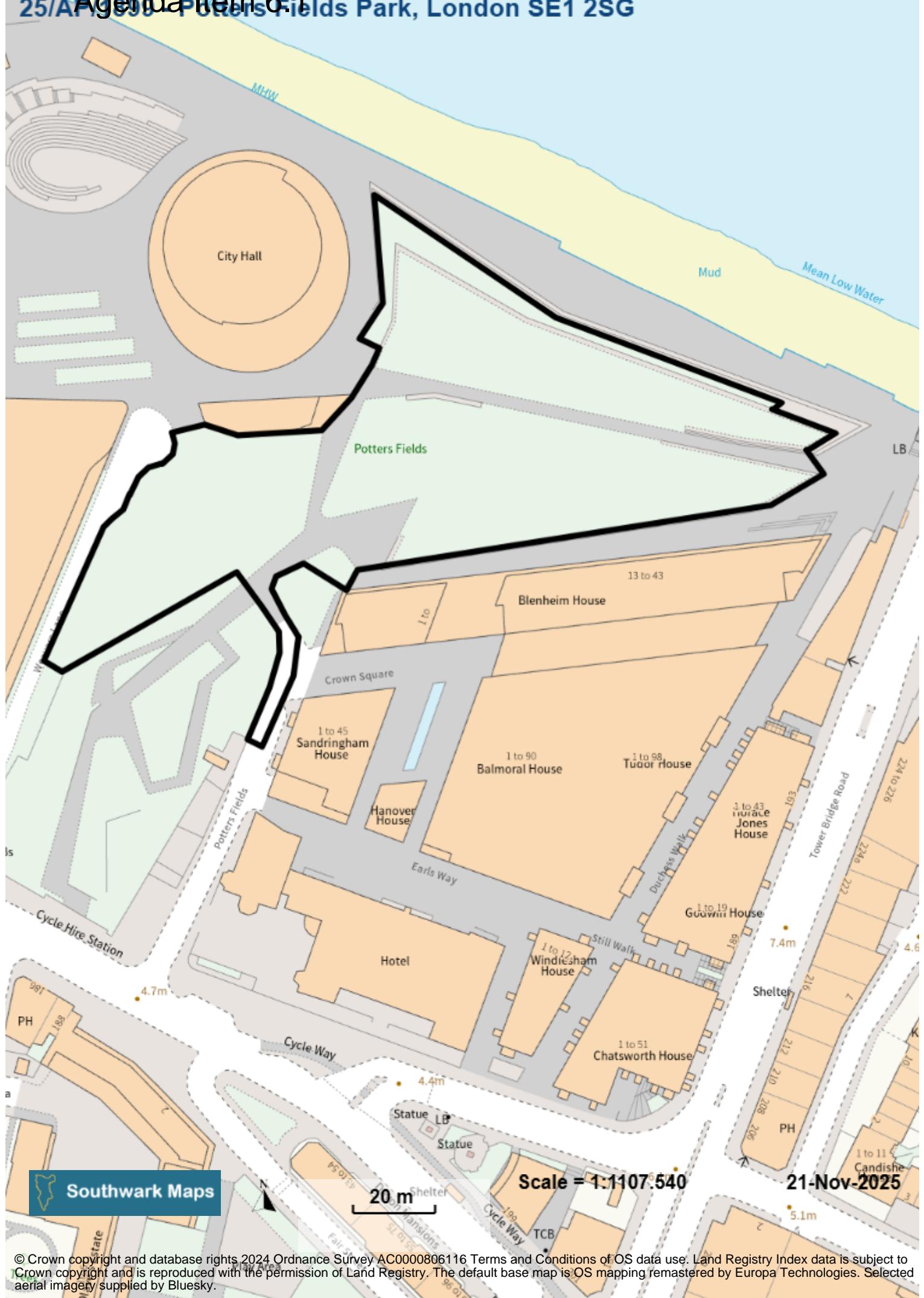
Background Papers	Held At	Contact
Council assembly agenda 23 May 2012	Constitutional Team 160 Tooley Street London SE1 2QH	Virginia Wynn-Jones 020 7525 7055
Each planning committee item has a separate planning case file	Development Management 160 Tooley Street London SE1 2QH	Planning Department 020 7525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

## APPENDICES

No.	Title
None	

## AUDIT TRAIL

<b>Lead Officer</b>	Chidilim Agada, Head of Constitutional Services	
<b>Report Author</b>	Kamil Dolebski, Specialist Planning Lawyer Beverley Olamijulo, Constitutional Officer	
<b>Version</b>	Final	
<b>Dated</b>	26 November 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	Yes	Yes
Director of Planning and Growth	No	No
<b>Cabinet Member</b>	No	No
<b>Date final report sent to Constitutional Team</b>	26 November 2025	



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<b>Meeting Name:</b>	Planning Committee (Smaller Applications)
<b>Date:</b>	8 December 2025
<b>Report title:</b>	<p><b>Development Management planning application:</b> Application 25/AP/1899 for Full Planning Application</p> <p><b>Address:</b> Potters Fields Park, Potters Fields, London Southwark SE1 2SG</p> <p><b>Proposal:</b> Temporary use of the open space for events with the erection of associated temporary structures (cumulatively no more than 800 sq. metres) for no more than 80 days in any one calendar year, for a period of five years.</p>
<b>Wards or groups affected:</b>	London Bridge and West Bermondsey
<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> 14 August 2025	<b>Application Expiry Date:</b> 12 December 2025
<b>Earliest Decision Date:</b>	19 November 2025

## RECOMMENDATION

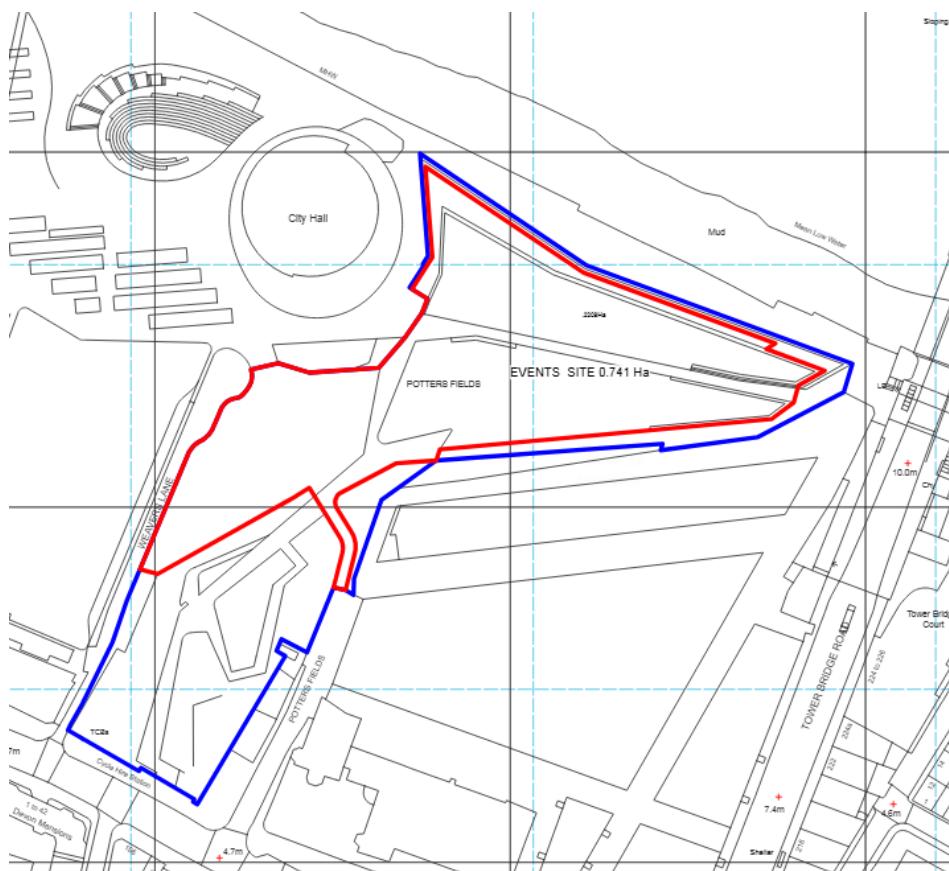
1. That planning permission be granted, subject to conditions set out in the report.

## BACKGROUND INFORMATION

### Site location and description

2. The application site is an area of Metropolitan Open Land (MOL) covering 0.741 hectares at Potters Fields Park, located on the north side of Tooley Street, comprised of green open spaces, trees, and public pathways. It is managed by Potters Fields Park Management Trust (the Trust). The site is adjoined by the Thames to the north of the site. The surrounding area is varied, including residential buildings, office blocks (including One More London), Tower Bridge and the former City Hall building, as defining features of the locality.

*Figure 1: Site location plan*



3. The site is subject to the following designations:

- Metropolitan Open Land (MOL)
- Central Activities Zone (CAZ)
- Thames Policy Area
- Bankside, Borough and London Bridge Opportunity Area
- North Southwark and Roman Roads Archaeological Priority Area
- London Bridge Area Vision Boundary
- London Bridge District Town Centre
- Team London Bridge Business Improvement District
- South Bank Strategic Cultural Area
- Air Quality Management Area
- Blackheath Point to St Paul's Cathedral London View Management Framework (6A.1)

- Primrose Hill summit to St Paul's Cathedral London View Management Framework (4A.1)
- London Bridge Critical Drainage Area
- Flood Zones 2 and 3

4. The site is subject to individual Tree Preservation Orders on two London Planes.

5. The application site itself is not listed, however there are a number of listed buildings and structures within the vicinity of the site, which are:

- Tower Bridge (Grade I)
- Tower Bridge Bridgemaster's House (Grade II)
- Accumulator and chimney stack to the East Side of Tower Bridge approach (Grade II)
- South London College (The Lalit Hotel) (Grade II).

6. There is no conservation area covering the site, though the site is situated between the Tooley Street Conservation Area and the Tower Bridge Conservation Area.

## **Planning history**

7. Planning permission 20/AP/0210 was granted on 19 June 2020 for the following:

Temporary use of the open space for events with the erection of associated temporary structures (cumulatively no more than 800 sq. metres) for no more than 75 days in any one calendar year, until 9 October 2025. (Amendment and renewal of existing temporary consent ref: 15/AP/1776).

8. The decision was made by Planning Sub-Committee B on 9 June 2020.

9. Prior to this planning permission 15/AP/1776 was granted on 9 October 2015 for the following:

Temporary use of the open space for events with the erection of associated temporary structures (cumulatively of no more than 800 sq metres) for no more than 66 days in any one financial year (56 days for events and an additional 10 days for set up and take down of associated structures) for a period of five years.

10. The decision was made by Planning Sub-Committee A on 7 September 2015.

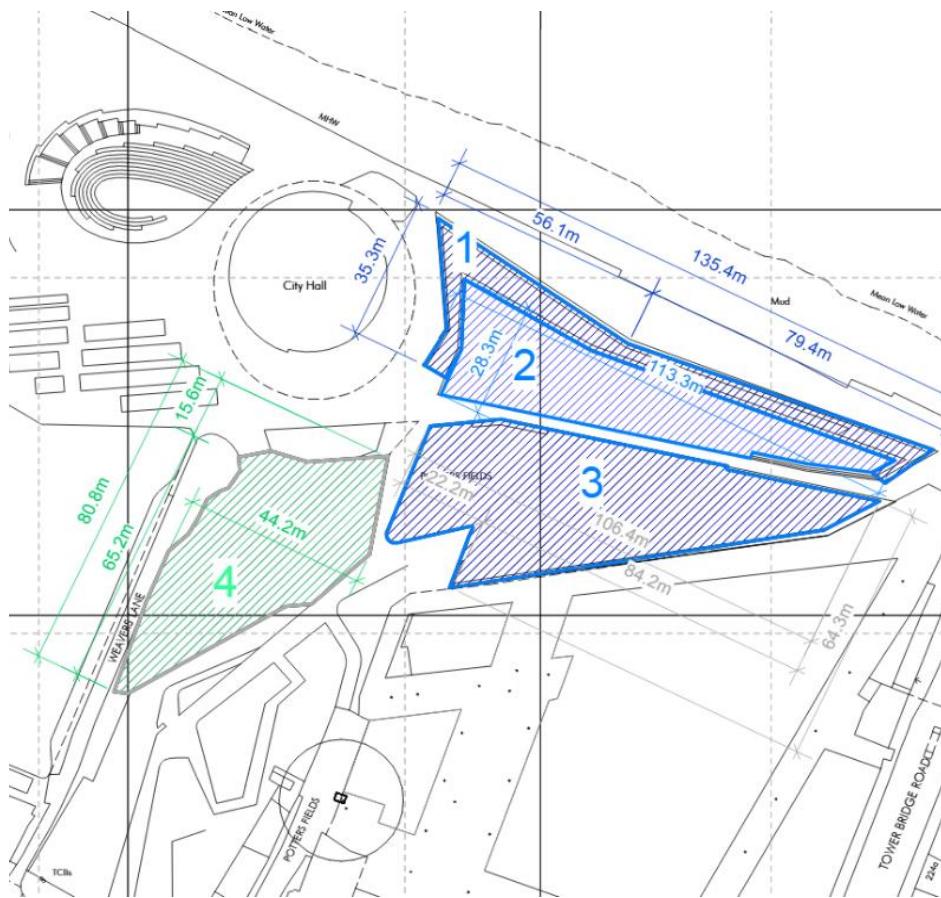
### Details of proposal

11. This application seeks permission for the temporary use of the open space for events with the erection of associated temporary structures (cumulatively no more than 800 sq. metres) for no more than 80 days in any one calendar year, for a period of five years. This is an increase of five days from the previous 75-day permission.

12. The proposal includes four separate events areas as follows:

- Lawn 1 = 944 sq. metres, for up to 80 days
- Lawn 2 = 1642 sq. metres, for up to 80 days
- Lawn 3 = 2579 sq. metres, for up to 80 days
- Lawn 4 = 1960 sq. metres, for up to 31 days

Figure 2: Events plan



13. As was the case in the previous permissions, the cumulative temporary structures would not exceed 800 sq. metres. The specific restrictions on these temporary structures, as stated on the events plan submitted with the application, are:

- To be cumulatively no more than 800 sq. metres within 3 or more structures
- Marquees, food stalls, art installations and gazebos to be no more than 4 metres in height above ground level
- Stages and other performance structures to be no more than 7 metres in height above ground level
- No two storey structures with internal staircases to be erected
- Lawn 1-3 to be used for paid and non-paid events for a period not exceeding 75 days in any one calendar year

- Lawn 4 to be used for paid and non-paid events for a period not exceeding 31 days in any one calendar year.

14. Since submission, the application has been amended to request a 5-year temporary permission instead of 12 years, in line with previous permissions on the site.

## **Details of consultation**

15. Initial neighbour notification letters were sent to 745 neighbouring properties on 29 October 2025. A site notice was placed on 28 August 2025 and a publication was placed in the Southwark News on 21 August 2025.

16. Three objections were received in response to the consultation. The objections raised the following material planning considerations:

- An increase to a change of use for up to 80 days a year is excessive
- The events would impact on neighbouring residents in terms of noise and anti-social behaviour
- The proposal would result in a loss of open space.

17. The application was amended as a result and the description of development was changed from seeking a 12-year planning permission to a five-year planning permission.

18. Subsequently, re-consultation was carried out with letters sent to those who objected to the original consultation on 29 October 2025 and an updated site notice was placed on 29 October 2025.

19. No comments were received following the re-consultation.

## **KEY ISSUES FOR CONSIDERATION**

### **Summary of main issues**

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

- Principle of the proposed development in terms of land use
- Design quality and heritage

- Impact upon amenity of neighbours
- Transport and highways
- Trees and landscaping
- Ecology and biodiversity.

### Legal context

21. 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.
22. There are also specific statutory duties, including in respect of the Public Sector Equalities Duty and certain designated heritage assets, which are highlighted in the relevant sections below and in the overall assessment at the end of the report.

### Planning policy

23. 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

24. Potters Field Park is designated as Metropolitan Open Land (MOL). Policy G3 (Metropolitan Open Land) of the London Plan affords MOL the same status and level of protection as Green Belt. It states that MOL should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt.
25. At a local level, Policy P57 (Open space) of the Southwark Plan states that development will not be permitted on MOL. In exceptional circumstances development may be permitted when:

1. It consists of ancillary facilities that positively contribute to the setting, accessibility and quality of the open space and if it does not affect its openness or detract from its character. Ancillary facilities on MOL must be essential for outdoor sport or recreation, cemeteries or for other uses of land which preserve the openness of MOL and do not conflict with its MOL function; or
2. It consists of the extension or alteration of an existing building providing that it does not result in disproportionate additions over and above the size of the original building; or
3. It consists of the replacement of an existing building, provided that the new building is no larger than the building it replaces.

26. Planning permission 15/AP/1776 first established the temporary use of Potters Fields Park as an events space as a justified departure from MOL policy. Planning permission 20/AP/0210 subsequently renewed this temporary use on the basis of exceptional circumstances and the significant public and community benefits delivered. At that time, the National Planning Policy Framework (NPPF) did not identify material changes of use as forms of development that could be appropriate in the Green Belt or MOL, and the events use was therefore treated as inappropriate development. As such, the “very special circumstances” test was applied and was considered to be met, enabling the temporary permissions.

27. The current application seeks a further temporary five-year period, increasing the total number of event days from 75 to 80 days per year for Areas 1–3 (as shown in Figure 2). Area 4 would continue to be used for up to 31 days per year. The applicant has provided the following justification:

- Organisers are required to keep events open to the public and are encouraged to include community engagement – large areas of the park are not closed off.
- Many events are now associated with sport and recreation and appropriate on MOL.
- The leisure, sporting and cultural events contribute to the social and cultural well being of residents and visitors to the area and positively contribute to the vitality and viability of the London Bridge Opportunity Area.
- The parameters plan limits physical structures to be appropriate within the wider context of the site and enable views and openness to be maintained.
- Income generated from events provides the primary source of income for

the Trust who are completely responsible for the maintenance and upkeep of the park; due to the high usage of the park, maintenance and management costs are high.

- Since 2017, the Trust has also managed St John's Churchyard Park, with income from Potters Fields contributing to its upkeep.

28. Since the previous applications were considered, the NPPF was updated in 2024. It now states that development in the Green Belt is inappropriate unless it is a form of development that preserves its openness and does not conflict with the purposes of including land within it. This applies to material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds). It also identifies as appropriate development the provision of facilities, including buildings, required in connection with an existing or proposed outdoor recreational use, provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land within it, as appropriate development. This means that a change of use can be considered appropriate development on MOL as long as it preserves the openness and does not conflict with the purpose of including land within it.

29. In this context, openness is the absence of built form and the degree to which land is free from development, both in a physical and spatial sense. The aim is to keep land open and prevent the construction of inappropriate permanent buildings.

30. Regarding the purposes of MOL, the supporting text for Policy G3 (Metropolitan Open Land) of the London Plan states that MOL is strategic open land within the urban area; the designation protects and enhances the open environment and improves Londoners' quality of life by providing localities which offer sporting and leisure uses, heritage value, biodiversity, food growing, and health benefits. It also states that proposals to enhance access to MOL and improve poorer quality areas will be encouraged. Further to this, Policy P57 (Open space) of the Southwark Plan emphasises that open spaces are essential resources for residents and visitors, used for sports and other exercise, relaxation, socialisation, nature conservation, food growing and cultural events.

31. The physical structures would only be in place for a total of 80 days in any one calendar year, with many of these days comprising site setup and takedown activities. The parameters plan appropriately limits the extent of physical structures on site, notably to no more than 800 sq. metres in total, and to maximum heights of 4 metres for marquees and stalls and 7 metres for stages, with no two-storey structures permitted. These facilities would support outdoor recreation. As such, the proposal would continue to have a negligible impact on the openness of the MOL due to the limited amount of

built form proposed and its temporary nature.

32. The use of the park for events does not undermine its designation as MOL. The entirety of the park would never be closed at any one time, and it would always remain open to the public. The proposed events encourage greater use of the park by visitors, while the financial benefits generated help to maintain and improve its quality.
33. Overall, the proposal to continue the temporary use of the park for events is considered to comply with policy. It constitutes a material change of use, supported by appropriate temporary facilities, that preserves the openness of the MOL and does not conflict with the purposes of its designation.

## **Design quality and heritage**

34. The park is not of heritage value itself but is within the setting of a number of heritage assets, including Tower of London (UNESCO World Heritage Site) across the river; grade I listed Tower Bridge and grade II listed Bridgemasters House in the east; locally listed former City Hall in the west/north; other listed and locally listed buildings around its southern end. The site borders Tooley Street Conservation Area to the south and Tower Bridge Conservation Area to the east.
35. Restrictions on the nature of temporary installations on the site would be as follows:
  - To be cumulatively no more than 800 sq. metres within 3 or more structures
  - Marquees, food stalls and gazebos to be no more than 4 metres in height above ground level
  - Stage performance structures and art installations to be no more than 7 metres in height above ground level
  - No two storey structures with internal staircases to be erected.
36. The modern appearance of the proposed temporary structures could appear incongruous within the setting of nearby heritage assets. However, given their limited scale as set by the abovementioned parameters and temporary nature, the resulting harm to the setting of these assets is considered to be less than substantial in accordance with paragraph 212 of the NPPF.
37. In this sensitive location, where views towards the Tower Bridge and the Tower of London, assets of the highest significance, may be affected, great weight must be given to heritage conservation.

- 38. While renewal of the temporary permission can be acceptable given previous precedents, careful consideration is required to ensure that the proposal does not result in cumulative harm over time. The revised proposal for a five-year permission (reduced from the originally proposed 12 years) is considered more proportionate and would allow for a future review should circumstances change.
- 39. Overall, the proposed temporary structures, subject to the parameter plans, are considered acceptable within this sensitive heritage setting. The limited scale, temporary nature, and reduced five-year duration ensure that any harm to the setting of nearby heritage assets is minimised and considered less than substantial in accordance with the NPPF, and is outweighed by the public benefit of the proposed events.

### **Impact upon amenity of neighbours**

- 40. A time-limit condition has been recommended which ensures that the proposed temporary change of use shall not be for more than 80 days within any one calendar year for a period of five years. It is noted that Part 4 Class B of the Town and Country Planning (General Permitted Development) (England) Order 2015 permits the use of any land for any purpose for not more than 28 days in total in any calendar year. A condition has been recommended removing this permitted development right to ensure that a change of use shall not take place from more than 80 days.
- 41. The previous permissions have been subject to compliance conditions for temporary events (including the set up and take down of any associated structures) to only take place between 07:00 and 23:00 on Mondays to Saturdays and between 07:00 and 22:00 on Sundays. There is no change to the proposed hours of use and this compliance condition has again been recommended.
- 42. The applicant has submitted an Event Hire Guide (dated April 2025), which sets out how event organisers must plan and manage events both legally and practically to respect local residents and minimise potential disruption. The guide covers matters such as health and safety, ecological protection, licensing, noise control, and other operational considerations. In line with previous permissions on the site, it is recommended that this document be secured by condition, requiring that all events carried out under the planning permission are undertaken in accordance with its provisions.
- 43. Within the Event Hire Guide, the playing of music on site is restricted to between 10:00 and 20:00 Monday to Saturday and 11:00 to 19:00 Sunday. This is the case within the previous permission and a bespoke condition has also been recommended securing these hours for clarity.

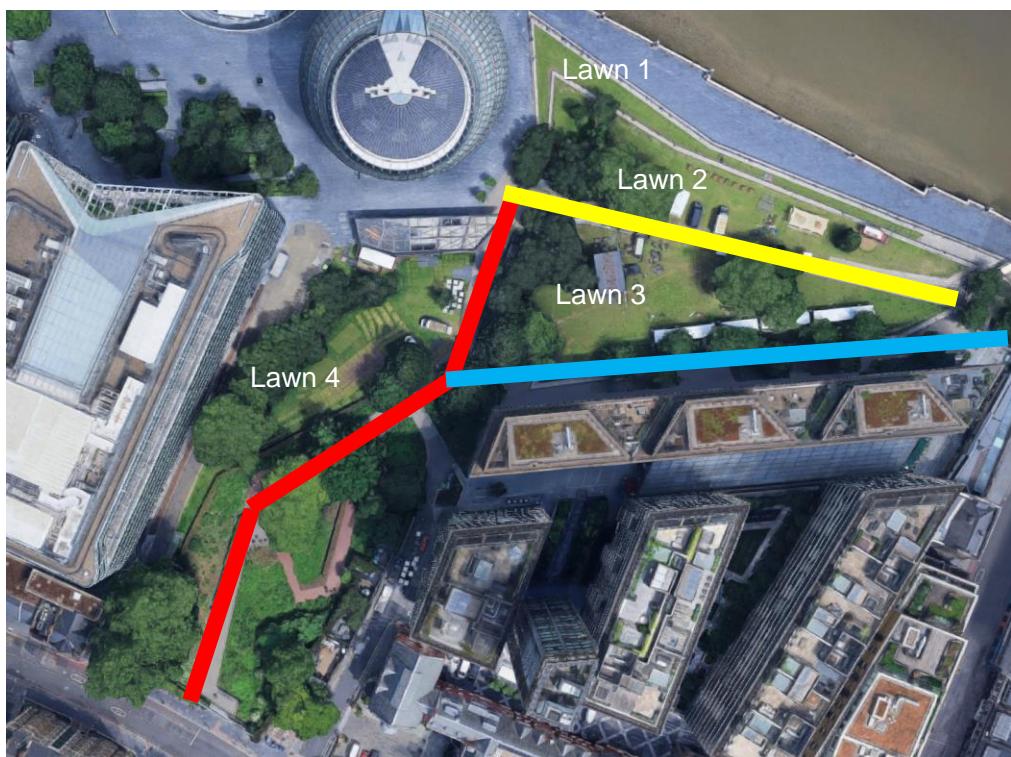
44. The Event Hire Guide also outlines protections for nearby residents, including the prevention of lighting from being angled towards nearby residential and commercial occupiers, and compliance with the Institution of Lighting Professionals guidance on mitigating the impact of lighting. Subject to this existing control, the proposal would not present a significant risk to nearby occupiers in this regard.
45. Subject to the recommended conditions securing the change of use for no more than 80 days per year over five years, the proposed hours of use and the playing of music and compliance with the submitted Event Hire Guide, it is not considered that the proposal would have any significant impacts on the amenity of neighbouring occupiers. The recommended conditions are consistent with those agreed on the previous permissions, though with an additional condition removing permitted development rights for a temporary change of use for clarity.
46. Overall, the proposed temporary use is acceptable subject to the recommended conditions which ensure that the use would be appropriately managed and would not result in unacceptable impacts on neighbouring amenity. The conditions maintain continuity with previous permissions while providing additional clarity regarding the maximum number of event days.

### **Transport and highways**

47. The site is well connected in terms of access to public transport, with London Bridge station within a 5-minute walk, and numerous bus services operating along Tooley Street and in the wider area. No car parking is proposed for the events, and visitors are encouraged to arrive at events by public transport, or by walking and cycling.

48. There is a Santander cycle station with 23 docking points next to the park entrance on Tooley Street and there are 44 cycle parking spaces on Weavers Lane, immediately adjacent to the park. It is also noted that an additional 60 cycle parking spaces for public use are proposed to be installed as part of the former City Hall development (24/AP/0918), with further spaces planned as part of the wider public realm development within More London. Given this context and the temporary nature of the proposals, it is not considered necessary for the applicant to make alternative provision for transport during events.

*Figure 3: Footpaths*



49. The main path from Tooley Street into the park between Lawn 3 and Lawn 4 (shown in red) is not part of the event area and would always remain open. The path next to the One Tower Bridge development (shown in blue) is not part of the event area and would always remain open. The central path between Lawns 2 and 3 (shown in yellow) would occasionally be used for access during build times or included to safely manage numbers during any larger or licensable events. In accordance with the Events Hire Guide, organisers are not permitted to obstruct paths and must allow a bare minimum of 1.2 metres for public access. The paths range in width from 3.5

metres to 7.9 metres.

50. There is no change proposed to deliveries and servicing which take place from within the site. The main route into the park is from Potters Fields (Lane) which is off Tooley Street; the route is for access, loading/unloading and deliveries only.
51. Overall, the site is well served by sustainable transport options, no car parking or cycle parking is required, and key pedestrian routes through the park would remain open. The continued temporary use would not give rise to significant transport or access impacts.

### Trees, landscaping, ecology and biodiversity

52. There are two London Plane trees on site with Tree Protection Orders, as well as various other trees that need to be protected. A condition has been recommended requiring an Event Specific Tree Protection Plan to be submitted prior to first use of the site to avoid damage.
53. A Preliminary Ecological Appraisal was undertaken on site on 27 May 2025 to assess the potential ecological impacts of the proposed development; the modified grassland within the site was assessed to be in poor condition. The proposed increase of five additional event days per year may result in a minor increase in physical disturbance and bare ground cover within this habitat parcel. It would nonetheless remain classified as being in poor condition. All individual trees and shrubs would be retained in their current condition.
54. As such, no change in condition is anticipated as a result of the proposed development. This means that the proposal is exempt from Biodiversity Net Gain requirements under the Environment Act 2021 by virtue of being 'de minimis' as the development would not change the biodiversity value. Notwithstanding this, a condition is recommended for a Habitat Management and Monitoring Plan (HMMP) to be submitted to ensure continued management of retained habitats.
55. A condition has been recommended for a Grounds Remediation Plan to be submitted to show the methods of ground and grass re-establishment post event. This is necessary to ensure that any impacts are mitigated.
56. Overall, the proposed temporary events use would not result in any change to the condition of existing habitats, would retain all trees and vegetation on site, and would not give rise to ecological harm. With the recommended conditions securing an Arboricultural Method Statement and a Habitat Management and Monitoring Plan, together with the protection measures set out in the Events Hire Guide, the proposal is considered acceptable in respect of trees, landscaping, ecology and biodiversity.

## Consultation responses from external consultees

57. Metropolitan Police:

- No comments.

58. Transport for London:

- Having reviewed the submitted material and taken account of the planning history and permitted development rights I can confirm that TfL has no strategic transport objections to the grant of consent.
- Given the length of permission now sought I would suggest that if granted the permission is subject to a condition requiring a framework events and works management plan to ensure that public routes are kept open and safe and convenient and delivery and servicing vehicles use appropriate bays for loading and unloading and don't impact on the safety and convenience of pedestrians and cyclists and on traffic including buses on adjacent highway. The potential to use electric vehicles and/or cargo bikes should be explored.
- Consideration should also be given to whether additional cycle parking is required for events' visitors staff and deliveries/waste away over and above that existing permanently. If there is a need for specific types or sizes of events then this should be secured.

Officer comment: The application has been amended to only cover a further five-year period so this is not considered necessary, particularly given no issues regarding this have been raised by Southwark's Transport and Highways Teams. Additional cycle parking on a temporary basis is not considered necessary. There is no change proposed to public access to the park.

## Consultation responses internal consultees

59. Urban Forester:

- The site has numerous trees some protected by TPO. The statement refers to tree protection conditions required for previous applications, however there is no consideration of how trees are affected in the current proposals.
- Request a condition for an Arboricultural Method Statement.

Officer comment: Pre-commencement condition recommended.

60. Design and Conservation Team:

- The modern structures could appear incongruous with the nearby heritage assets. Given the limited scale and temporary nature of the structures/installations, officers are satisfied that harm to the setting of the nearby heritage assets would be less than substantial. However, in this case where the temporary structures could affect views of the Tower Bridge and Tower of London, which are assets of the highest significance, a greater weight should be given the heritage conservation in line with paragraph 212 of the NPPF 2024.
- While renewal of the temporary permission could be acceptable given the precedents, an objection is raised against the increase in the duration of the permission (from five to 12 years) and the number of days the space can be used per calendar year (from 75 to 80 days). Caution should be exercised where the proposal affects assets of the highest significance. The current proposal would deny us opportunity to review the permission until 2037 in case of any changes in circumstances. Also, there is insufficient public benefit to justify the additional harm resulting from the increased event days.

Officer comment: Noted. The application has been amended to seek a five-year permission.

61. Transport Planning Policy:

- No objection
- Require confirmation of width of routes that will be maintained to ensure that pedestrian permeability is maintained and details of cycle parking.

Officer comment: Details of cycle parking and cycle hire within the immediate surrounding area have been provided. There is no reduction to path widths proposed and details of the widths have been provided. The main paths through the park would always remain accessible.

62. Highways Development Management:

- Event management plan required
- Adequate safe passage widths are to be allowed for along internal paths and along the review front, allowing for movement in both directions
- Loading and unloading should be carried out safely and securely.

Officer comment: The Events Hire Guide would be secured by condition. Full details of path widths have been provided and the main paths would never be fully closed. Servicing shall remain as existing.

### Human rights implications

63. 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.
64. This application has the legitimate aim of providing a further temporary planning permission for the use of the park for events. 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

65. The council has published its development plan on its website together with advice about how applications are considered and the information that needs to be submitted to ensure timely consideration of an application. Applicants are advised that planning law requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise.
66. The council provides a pre-application advice service that is available to all applicants in order to assist applicants in formulating proposals that are in accordance with the development plan and core strategy and submissions that are in accordance with the application requirements.

### Positive and proactive engagement: summary table

Was the pre-application service used for this application?	No
If the pre-application service was used for this application, was the advice given followed?	N/A
Was the application validated promptly?	Yes

If necessary/appropriate, did the case officer seek amendments to the scheme to improve its prospects of achieving approval?	Yes
To help secure a timely decision, did the case officer submit their recommendation in advance of the agreed Planning Performance Agreement date?	Yes

## CONCLUSION

67. The proposal seeks a further temporary five-year permission for the use of Potters Fields Park for events with associated temporary structures, allowing up to 80 event days per calendar year. The NPPF states that material changes of use can constitute appropriate development on MOL land where they preserve openness and do not conflict with the purposes of its designation. Within this context, the proposed temporary events use, supported by controlled ancillary structures, is considered to represent appropriate development on MOL.

68. The scale, form, and temporary nature of the structures, restricted to a maximum of 800 sq. metres and controlled heights, ensure that the openness of the MOL would be preserved. The park would remain largely open and accessible throughout the year, and public routes would remain available. The proposal does not conflict with the purposes of the MOL designation, which includes providing opportunities for outdoor recreation, enhancing access to open space, and supporting cultural and community uses. The events programme would continue to deliver cultural, leisure, social and community benefits, contributing positively to the character of the London Bridge Opportunity Area and the wider Central Activities Zone.

69. Heritage impacts would be limited and temporary; any such impacts are assessed as less than substantial and are minimised by the five-year duration of permission and the requirement to adhere to the submitted parameters plan.

70. For the reasons above, the proposal is considered to constitute appropriate development on Metropolitan Open Land in accordance with the updated NPPF and relevant London Plan and Southwark Plan policies. On balance, it is recommended that a temporary planning permission is granted, subject to conditions.

## BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Local Development Framework and Development Plan Documents	Environment, Sustainability and Leisure Resources Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Council website: www.southwark.gov.uk

## APPENDICES

No.	Title
Appendix 1	Recommendation (draft decision notice)
Appendix 2	Relevant planning policy
Appendix 3	Planning history of the site and nearby sites
Appendix 4	Consultation undertaken
Appendix 5	Consultation responses received

**AUDIT TRAIL**

<b>Lead Officer</b>	Stephen Platts, Director of Planning and Growth	
<b>Report Author</b>	Abbie McGovern, Team Leader – Major Applications and New Homes	
<b>Version</b>	Final	
<b>Dated</b>	21 November 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 Leisure	No	No
Strategic Director, Housing	No	No
<b>Date final report sent to Constitutional Team</b>	21 November 2025	

**APPENDIX 1**

**Recommendation**  
**Draft decision notice**

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>	Ms Sheila Benjamin  Potters Fields Park Management Trust	<b>Reg. Number</b>	25/AP/1899
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**Application Type** Minor application

<b>Recommendation</b>	<b>Case Number</b>
	PP-14143435

**Draft of Decision Notice**

**for the following development:**

Temporary use of the open space for events with the erection of associated temporary structures (cumulatively no more than 800 sq. metres) for no more than 80 days in any one calendar year, for a period of five years.

Potters Fields Park Potters Fields London Southwark

**In accordance with application received on 2 July 2025 and Applicant's Drawing Nos:**

SITE LOCATION PLAN 352 0 001 received 16/10/2025

EVENTS PLAN 123\_PL\_003B C received 11/11/2025

EVENT HIRE GUIDE received 02/07/2025

**Time limit for implementing this permission and the approved plans**

1. The temporary use hereby permitted shall be for not more than 80 days within any one calendar year for a period of five-years from the date of this permission, on or before which date the temporary use of the park for events shall be discontinued.

**Reason:**

Such use, other than for a temporary period would prejudice the openness of the Metropolitan Open Land in accordance with the National Planning Policy Framework 2024, Policy G3 (Metropolitan Open Land) of the London Plan 2021 and Policy P57 (Open space) of the Southwark Plan 2022.

**Permission is subject to the following Pre-Commencements Conditions**

2. Prior to first use of the site an Event Specific Tree Protection Plan has been submitted to the Local Planning Authority. A detailed tree protection plan showing the methods of access and tree and ground protection shall be provided no later than 5 days prior (with occasional exceptions for late bookings) to any event so consented.

Works shall comply to BS: 5837 (2012) Trees in relation to demolition, design and construction; BS3998: (2010) Tree work – recommendations; BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf); EAS 01:2021 (EN) – Tree Pruning Standard; EAS 03:2022 (EN) – Tree Planting Standard.

**Reason:**

To avoid damage to the existing trees which represent an important visual amenity in the area, in accordance with the National Planning Policy Framework 2024, Policies G1 (Green infrastructure), G5 (Urban greening) and G7 (Trees and woodlands) of the London Plan 2021 and Policies P13 (Design of places), P56 (Protection of amenity), P57 (Open space), P60 (Biodiversity) and P61 (Trees) of the Southwark Plan 2022.

3. Prior to first use of the site a Grounds Remediation Plan shall be submitted to and approved in writing by the Local Planning Authority. This shall show the methods of ground and grass re-establishment post event. Where reinstatement is required following an event it is to be agreed in consultation with the Local Planning Authority and may include further draining or slitting if it is required.

Reason: To avoid unacceptable impacts on amenity and the site left unusable for an extended period, 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 P13 (Design of places), P56 (Protection of amenity), P57 (Open space), P60 (Biodiversity) and P61 (Trees) of the Southwark Plan 2022.

4. Prior to first use of the site for events under this planning permission, a Habitat Management and Monitoring Plan (HMMP) shall be submitted to and approved in writing by the Local Planning Authority:

- (a) a non-technical summary;
- (b) the roles and responsibilities of the people or organisations delivering the HMMP;
- (c) the planned habitat creation and enhancement works to create or improve habitat; and
- (d) the management measures to maintain habitat.

Reason:

To ensure continued management for retained habitats in accordance with the National Planning Policy Framework 2024), Policy G6 (Biodiversity and access to nature) of the London Plan 2021 and Policies P59 (Green infrastructure) and P60 (Biodiversity) of the Southwark Plan 2022.

#### **Permission is subject to the following Compliance Conditions**

5. The use hereby permitted for temporary events (including the set up and take down of any associated structures) shall not be carried on outside of

the hours 07:00 to 23:00 on Mondays to Saturdays or 07:00 to 22:00 on Sundays.

Reason:

To safeguard the amenity of neighbouring residential properties in accordance with the National Planning Policy Framework 2024 and Policies P56 (Protection of amenity) and P66 (Reducing noise pollution and enhancing soundscapes) of the Southwark Plan 2022.

6. The use hereby consented shall be carried out in accordance with the Event Hire Guide Potters Fields Park Management Trust Issue: April 2025.

Reason:

To safeguard the amenity of neighbouring residential properties in accordance with the National Planning Policy Framework 2024 and Policies P56 (Protection of amenity) and P66 (Reducing noise pollution and enhancing soundscapes) of the Southwark Plan 2022.

7. The playing of music on site shall not take place outside of the hours 10:00 to 20:00 on Mondays to Saturdays or 11:00 to 19:00 on Sundays.

Reason:

To safeguard the amenity of neighbouring residential properties in accordance with the National Planning Policy Framework 2024 and Policies P56 (Protection of amenity) and P66 (Reducing noise pollution and enhancing soundscapes) of the Southwark Plan 2022

8. Permitted development rights under Part 4 Class B of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) (GPDO) are hereby removed for the application site.

Reason:

To ensure that the temporary use of the park hereby approved for events for 80 days within any one calendar year over a five-year period are not exceeded.

**APPENDIX 2****Relevant planning policy****National Planning Policy Framework**

The revised National Planning Policy Framework ('NPPF') was published in 2024 and sets out the national planning policy and how this needs to be applied. The NPPF focuses on sustainable development with three key objectives: economic, social and environmental. Paragraph 218 states that the policies in the Framework are material considerations, which should be taken into account in dealing with applications.

The relevant chapters from the Framework are:

- Chapter 2 Achieving sustainable development
- Chapter 8 Promoting healthy and safe communities
- Chapter 9 Promoting sustainable transport
- Chapter 11 Making effective use of land
- Chapter 12 Achieving well-designed places
- Chapter 14 Meeting the challenge of climate change, flooding and coastal change
- Chapter 15 Conserving and enhancing the natural environment
- Chapter 16 Conserving and enhancing the historic environment

**The London Plan 2021**

On 2 March 2021, the Mayor of London published the London Plan 2021. The spatial development strategy sets a strategic framework for planning in Greater London and forms part of the statutory Development Plan for Greater London. The relevant policies are:

- Policy D14 Noise
- Policy HC1 Heritage conservation and growth
- Policy G1 Green infrastructure

- Policy G3 Metropolitan Open Land
- Policy G4 Open space
- Policy G5 Urban greening
- Policy G6 Biodiversity and access to nature
- Policy G7 Trees and woodlands
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling
- Policy T6 Car parking
- Policy T7 Deliveries, servicing and construction

## **Southwark Plan 2022**

The Southwark Plan 2022 was adopted on 23 February 2022. The plan provides strategic policies, development management policies, area visions and site allocations which set out the strategy for managing growth and development across the borough from 2019 to 2036. The relevant policies are:

- Policy P19 Listed buildings and structures
- Policy P20 Conservation areas
- Policy P21 Conservation of the historic environment and natural heritage
- Policy P50 Highways impacts
- Policy P51 Walking
- Policy P53 Cycling
- Policy P54 Car parking
- Policy P56 Protection of amenity
- Policy P57 Open space
- Policy P59 Green infrastructure
- Policy P60 Biodiversity
- Policy P61 Trees
- Policy P66 Reducing noise pollution and enhancing soundscapes

**APPENDIX 3****Planning history of the site and nearby sites**

Reference and Proposal	Status
<b>20/AP/0210</b> <p>Temporary use of the open space for events with the erection of associated temporary structures (cumulatively no more than 800 sq. metres) for no more than 75 days in any one calendar year, until October 9th 2025. (Amendment and renewal of existing temporary consent ref: 15/AP/1776)</p>	GRANTED - Major Application 10/06/2020
<b>15/AP/1776</b> <p>Temporary use of the open space for events with the erection of associated temporary structures (cumulatively of no more than 800 sq metres) for no more than 66 days in any one financial year (56 days for events and an additional 10 days for set up and take down of associated structures) for a period of five years.</p>	GRANTED- Minor Application 09/10/2015

## APPENDIX 4

### Consultation and re-consultation undertaken

**Site notice dates:** 28/08/2025 and 29/10/2025

**Press notice date:** 21/08/2025

**Neighbour consultation letters sent:** 18/08/2025 and 29/10/2025

#### **Internal services consulted:**

LBS Environmental Protection Team

LBS Ecology Officer

LBS Urban Forester

LBS Transport Policy Team

LBS Highways Development & Management

LBS Environmental Protection Team

Flood Risk Management & Urban Drainage Team

LBS Local Economy

#### **Statutory and non-statutory organisations:**

Environment Agency

Transport For London

Metropolitan Police Service (Designing Out Crime)

#### **Neighbour and local groups consulted:**

10 Horace Jones House Duchess Walk  
London

8 Horace Jones House Duchess Walk  
London

2 Horace Jones House Duchess Walk

9 Horace Jones House Duchess Walk  
London

7 Horace Jones House Duchess Walk  
London

28 Blenheim House Crown Square

London	London
15 Godwin House Still Walk London	Flat 10 2 Fair Street London
Flat 4 2 Fair Street London	51 Devon Mansions Tooley Street London
8 Devon Mansions Tooley Street London	30 Devon Mansions Tooley Street London
13 Devon Mansions Tooley Street London	92 Tudor House 1 Duchess Walk London
89 Tudor House 1 Duchess Walk London	88 Tudor House 1 Duchess Walk London
72 Tudor House 1 Duchess Walk London	68 Tudor House 1 Duchess Walk London
62 Tudor House 1 Duchess Walk London	51 Tudor House 1 Duchess Walk London
50 Tudor House 1 Duchess Walk London	46 Tudor House 1 Duchess Walk London
44 Tudor House 1 Duchess Walk London	39 Tudor House 1 Duchess Walk London
38 Tudor House 1 Duchess Walk London	37 Tudor House 1 Duchess Walk London
2 Potters Fields Park Potters Fields London	Flat 41 Admirals Court 30 Horselydown Lane
Flat 39 Admirals Court 30 Horselydown Lane	Flat 37 Admirals Court 30 Horselydown Lane
Flat 12 Admirals Court 30 Horselydown Lane	Flat 10 Admirals Court 30 Horselydown Lane
32 Horselydown Lane London Southwark	20A Horselydown Lane London Southwark
Fourth Floor At 4 More London Riverside London	26 Sandringham House Earls Way London
17 Sandringham House Earls Way London	5 Sandringham House Earls Way London
87 Balmoral House Earls Way London	67 Balmoral House Earls Way London
62 Balmoral House Earls Way London	52 Balmoral House Earls Way London
46 Balmoral House Earls Way London	30 Balmoral House Earls Way London
29 Balmoral House Earls Way London	Flat 28 Lewes House Druid Street
Flat 24 Lewes House Druid Street	Flat 23 Lewes House Druid Street
Flat 18 Lewes House Druid Street	Flat 16 Lewes House Druid Street
48 St. Olaves Estate Druid Street London	7 St. Olaves Estate Druid Street London
9 St. Olaves Estate Druid Street London	41 St. Olaves Estate Druid Street London
39 St. Olaves Estate Druid Street London	4 St. Olaves Estate Druid Street London

Suite 173 First Floor 3 More London Riverside London	Suite 168 170 And 172 First Floor 3 More London Riverside London
Suite 166 First Floor 3 More London Riverside London	Suite 154 First Floor 3 More London Riverside London
Suite 152 First Floor 3 More London Riverside London	Suite 150 First Floor 3 More London Riverside London
Suite 141 First Floor 3 More London Riverside London	Suite 137 First Floor 3 More London Riverside London
Suite 130 First Floor 3 More London Riverside London	Suite 123 First Floor 3 More London Riverside London
Suite 122 First Floor 3 More London Riverside London	Suite 120 First Floor 3 More London Riverside London
Suite 108 First Floor 3 More London Riverside London	Ninth Floor 4 More London Riverside London
Sixth To Ninth Floors 4 More London Riverside London	9 Windlesham House Duchess Walk London
5 Windlesham House Duchess Walk London	2 Windlesham House Duchess Walk London
30 Horace Jones House Duchess Walk London	224A Tower Bridge Road London Southwark
17 Godwin House Still Walk London	16 Godwin House Still Walk London
7 Godwin House Still Walk London	Flat 12 2 Fair Street London
Flat 3 2 Fair Street London	Flat 9 2 Fair Street London
48 Devon Mansions Tooley Street London	6 Devon Mansions Tooley Street London
32 Devon Mansions Tooley Street London	2 Devon Mansions Tooley Street London
17 Devon Mansions Tooley Street London	15 Devon Mansions Tooley Street London
10 Devon Mansions Tooley Street London	Unit 2 188 Tooley Street London
82 Tudor House 1 Duchess Walk London	81 Tudor House 1 Duchess Walk London
55 Tudor House 1 Duchess Walk London	10 Godwin House Still Walk London
1 Horace Jones House Duchess Walk London	23 Blenheim House Crown Square London
11 Godwin House Still Walk London	5 Godwin House Still Walk London
Flat 5 2 Fair Street London	54 Devon Mansions Tooley Street London
52 Devon Mansions Tooley Street London	46 Devon Mansions Tooley Street London

4 Devon Mansions Tooley Street London	38 Devon Mansions Tooley Street London
34 Devon Mansions Tooley Street London	14 Devon Mansions Tooley Street London
1 Devon Mansions Tooley Street London	2 Duchess Walk London Southwark
Unit 9 1 Tudor House 1 Duchess Walk	98 Tudor House 1 Duchess Walk London
95 Tudor House 1 Duchess Walk London	90 Tudor House 1 Duchess Walk London
77 Tudor House 1 Duchess Walk London	75 Tudor House 1 Duchess Walk London
74 Tudor House 1 Duchess Walk London	47 Tudor House 1 Duchess Walk London
19 Tudor House 1 Duchess Walk London	15 Tudor House 1 Duchess Walk London
13 Tudor House 1 Duchess Walk London	9 Tudor House 1 Duchess Walk London
6 Tudor House 1 Duchess Walk London	Flat 36 Admirals Court 30 Horselydown Lane
Flat 33 Admirals Court 30 Horselydown Lane	Flat 8 Admirals Court 30 Horselydown Lane
Flat 2 Admirals Court 30 Horselydown Lane	Managers Flat 20A Horselydown Lane London
Front And Centre Offices Fifth Floor 4 More London Riverside London	12 Sandringham House Earls Way London
2 Sandringham House Earls Way London	84 Balmoral House Earls Way London
71 Balmoral House Earls Way London	68 Balmoral House Earls Way London
61 Balmoral House Earls Way London	59 Balmoral House Earls Way London
56 Balmoral House Earls Way London	45 Balmoral House Earls Way London
43 Balmoral House Earls Way London	40 Balmoral House Earls Way London
38 Balmoral House Earls Way London	36 Balmoral House Earls Way London
6 Balmoral House Earls Way London	1 Balmoral House Earls Way London
Flat 32 Lewes House Druid Street	Flat 27 Lewes House Druid Street
Flat 40 Admirals Court 30 Horselydown Lane	42 Tudor House 1 Duchess Walk London
23 Tudor House 1 Duchess Walk London	7 Tudor House 1 Duchess Walk London
Flat 30 Admirals Court 30 Horselydown Lane	Flat 28 Admirals Court 30 Horselydown Lane
Flat 25 Admirals Court 30 Horselydown Lane	Flat 1 Admirals Court 30 Horselydown Lane

40 Sandringham House Earls Way London	30 Sandringham House Earls Way London
15 Sandringham House Earls Way London	8 Sandringham House Earls Way London
90 Balmoral House Earls Way London	80 Balmoral House Earls Way London
77 Balmoral House Earls Way London	72 Balmoral House Earls Way London
54 Balmoral House Earls Way London	47 Balmoral House Earls Way London
42 Balmoral House Earls Way London	39 Balmoral House Earls Way London
33 Balmoral House Earls Way London	25 Balmoral House Earls Way London
21 Balmoral House Earls Way London	20 Balmoral House Earls Way London
17 Balmoral House Earls Way London	14 Balmoral House Earls Way London
4 Balmoral House Earls Way London	Flat 30 Lewes House Druid Street
Flat 21 Lewes House Druid Street	Flat 19 Lewes House Druid Street
Flat 9 Lewes House Druid Street	Flat 6 Lewes House Druid Street
45 St. Olaves Estate Druid Street London	49 St. Olaves Estate Druid Street London
43 St. Olaves Estate Druid Street London	23 St. Olaves Estate Druid Street London
20 St. Olaves Estate Druid Street London	Suite 109 First Floor 3 More London Riverside London
Suite 183 First Floor 3 More London Riverside London	Suite 182 First Floor 3 More London Riverside London
Suite 175 First Floor 3 More London Riverside London	Suite 160 First Floor 3 More London Riverside London
Suite 156 First Floor 3 More London Riverside London	Suite 148 First Floor 3 More London Riverside London
Suite 143 First Floor 3 More London Riverside London	Suite 142 First Floor 3 More London Riverside London
Suite 139 First Floor 3 More London Riverside London	Suite 136 First Floor 3 More London Riverside London
Suite 132 First Floor 3 More London Riverside London	27 St. Olaves Estate Druid Street London
Flat 25 Lewes House Druid Street	Flat 13 Lewes House Druid Street
51 St. Olaves Estate Druid Street London	6 St. Olaves Estate Druid Street London
42 St. Olaves Estate Druid Street London	21 St. Olaves Estate Druid Street London

19 St. Olaves Estate Druid Street London	Suite 181 First Floor 3 More London Riverside London
Suite 162 First Floor 3 More London Riverside London	Suite 159 First Floor 3 More London Riverside London
Suite 158 First Floor 3 More London Riverside London	Suite 147 First Floor 3 More London Riverside London
Suite 134 First Floor 3 More London Riverside London	Suite 131 First Floor 3 More London Riverside London
Suite 107 First Floor 3 More London Riverside London	Suite 104 First Floor 3 More London Riverside London
Suite 101B First Floor 3 More London Riverside London	Suite 101 First Floor 3 More London Riverside London
Level 2 Basement 3 More London Riverside London	Fourth Floor 3 More London Riverside London
First Floor 4 More London Riverside London	4 Windlesham House Duchess Walk London
35 Horace Jones House Duchess Walk London	34 Horace Jones House Duchess Walk London
33 Horace Jones House Duchess Walk London	23 Horace Jones House Duchess Walk London
16 Horace Jones House Duchess Walk London	5 Blenheim House Crown Square London
18 Godwin House Still Walk London	14 Godwin House Still Walk London
8 Godwin House Still Walk London	Flat 11 2 Fair Street London
Flat 2 2 Fair Street London	Flat 8 2 Fair Street London
Horselydown Offices 2 Fair Street London	47 Devon Mansions Tooley Street London
9 Devon Mansions Tooley Street London	41 Devon Mansions Tooley Street London
35 Devon Mansions Tooley Street London	3 Devon Mansions Tooley Street London
5 Duchess Walk London Southwark	4 Duchess Walk London Southwark
9 Duchess Walk London Southwark	84 Tudor House 1 Duchess Walk London
71 Tudor House 1 Duchess Walk London	66 Tudor House 1 Duchess Walk London
54 Tudor House 1 Duchess Walk London	34 Tudor House 1 Duchess Walk London
21 Tudor House 1 Duchess Walk London	South Part Third Floor 4 More London Riverside London

Suite 112 First Floor 3 More London Riverside London	West Part Third Floor 3 More London Riverside London
Ground Floor 3 More London Riverside London	Second Floor 4 More London Riverside London
42 Horace Jones House Duchess Walk London	38 Horace Jones House Duchess Walk London
37 Horace Jones House Duchess Walk London	29 Horace Jones House Duchess Walk London
28 Horace Jones House Duchess Walk London	19 Horace Jones House Duchess Walk London
13 Horace Jones House Duchess Walk London	11 Horace Jones House Duchess Walk London
5 Horace Jones House Duchess Walk London	14 Hanover House Crown Square London
4 Blenheim House Crown Square London	40 Blenheim House Duchess Walk London
32 Blenheim House Crown Square London	5 Hanover House Crown Square London
1 Hanover House Crown Square London	17 Blenheim House Crown Square London
34 Blenheim House Duchess Walk London	1 Potters Fields London Southwark
First Floor 226 Tower Bridge Road London	191 Tower Bridge Road London Southwark
Flat 15 2 Fair Street London	Flat 16 2 Fair Street London
53 Devon Mansions Tooley Street London	36 Devon Mansions Tooley Street London
31 Devon Mansions Tooley Street London	28 Devon Mansions Tooley Street London
25 Devon Mansions Tooley Street London	23 Devon Mansions Tooley Street London
16 Devon Mansions Tooley Street London	97 Tudor House 1 Duchess Walk London
85 Tudor House 1 Duchess Walk London	69 Tudor House 1 Duchess Walk London
63 Tudor House 1 Duchess Walk London	43 Tudor House 1 Duchess Walk London
33 Tudor House 1 Duchess Walk London	Suite 114 First Floor 3 More London Riverside London
17 Tudor House 1 Duchess Walk London	16 Tudor House 1 Duchess Walk London

1 Tudor House 1 Duchess Walk London	Unit 4 Potters Fields Park Potters Fields
Flat 38 Admirals Court 30 Horselydown Lane	Flat 24 Admirals Court 30 Horselydown Lane
Flat 16 Admirals Court 30 Horselydown Lane	Flat 7 Admirals Court 30 Horselydown Lane
Rear Office Fifth Floor 4 More London Riverside London	4 Tudor House 1 Duchess Walk London
29 Sandringham House Earls Way London	24 Sandringham House Earls Way London
20 Sandringham House Earls Way London	18 Sandringham House Earls Way London
14 Sandringham House Earls Way London	13 Sandringham House Earls Way London
10 Sandringham House Earls Way London	7 Sandringham House Earls Way London
6 Sandringham House Earls Way London	4 Sandringham House Earls Way London
85 Balmoral House Earls Way London	82 Balmoral House Earls Way London
73 Balmoral House Earls Way London	37 Balmoral House Earls Way London
58 Balmoral House Earls Way London	44 Balmoral House Earls Way London
41 Balmoral House Earls Way London	28 Balmoral House Earls Way London
23 Balmoral House Earls Way London	19 Balmoral House Earls Way London
Flat 31 Lewes House Druid Street	Flat 10 Lewes House Druid Street
Flat 3 Lewes House Druid Street	50 St. Olaves Estate Druid Street London
29 St. Olaves Estate Druid Street London	Suite 184 First Floor 3 More London Riverside London
Suite 180 First Floor 3 More London Riverside London	Suite 157 First Floor 3 More London Riverside London
Suite 151 First Floor 3 More London Riverside London	Suite 146B First Floor 3 More London Riverside London
Suite 146A First Floor 3 More London Riverside London	Suite 145B First Floor 3 More London Riverside London
Suite 138 First Floor 3 More London Riverside London	Suite 135 First Floor 3 More London Riverside London
Suite 124 First Floor 3 More London	Suite 116 First Floor 3 More London

Riverside London	Riverside London
Suite 113 First Floor 3 More London Riverside London	Suite 111 First Floor 3 More London Riverside London
Suite 110 First Floor 3 More London Riverside London	Suite 102 First Floor 3 More London Riverside London
Office B Second Floor 3 More London Riverside London	Fourth Floor 4 More London Riverside London
Part Lower Ground And Basement 4 More London Riverside London	Lower Ground Floor 4 More London Riverside London
Rear Part Fifth Floor 4 More London Riverside London	Management Suite Windlesham House Duchess Walk
6 Horace Jones House Duchess Walk London	40 Horace Jones House Duchess Walk London
32 Horace Jones House Duchess Walk London	27 Horace Jones House Duchess Walk London
3 Horace Jones House Duchess Walk London	First And Second Floor 226 Tower Bridge Road London
31 Blenheim House Crown Square London	25 Blenheim House Crown Square London
Flat 7 Anchor Brewhouse 50 Shad Thames	16 Blenheim House Crown Square London
9 Blenheim House Crown Square London	19 Godwin House Still Walk London
13 Godwin House Still Walk London	12 Godwin House Still Walk London
2 Godwin House Still Walk London	Second Floor 226 Tower Bridge Road London
Flat 15 Admirals Court 30 Horselydown Lane	32 Tudor House 1 Duchess Walk London
12 Tudor House 1 Duchess Walk London	8 Tudor House 1 Duchess Walk London
Flat 34 Admirals Court 30 Horselydown Lane	Flat 19 Admirals Court 30 Horselydown Lane
36 Horselydown Lane London Southwark	Tower Bridge Museum Tower Bridge Tower Bridge Road
Office 2 Fourth Floor 3 More London Riverside London	4 Crown Square London Southwark
Managers Office Tower Bridge Museum Tower Bridge Tower Bridge Road	1 Tower Bridge Road London Southwark

Flat 30 Anchor Brewhouse Shad Thames	224 - 226 Tower Bridge Road London Southwark
3 Potters Fields Park Potters Fields London	First And Second Floor 222 Tower Bridge Road London
6 - 8 Druid Street London Southwark	39 Blenheim House Duchess Walk London
Unit 1 Bridgemasters House Duchess Walk	193 Tower Bridge Road London Southwark
Part Basement Third Floor Fourth Floor And Fifth Floor 226 Tower Bridge Road London	Unit 6 1 2 Duchess Walk London
8 Duchess Walk London Southwark	1 Horselydown Lane London Southwark
Third Floor 4 More London Riverside London	Unit 2 Bridgemasters House Duchess Walk
9 - 10 Copper Row London Southwark	1 Crown Square London Southwark
147 Tooley Street London Southwark	Unit 1 188 Tooley Street London
155 - 171 Tooley Street London Southwark	150 Tooley Street London Southwark
160 Tooley Street London Southwark	181 Tooley Street London Southwark
186 Tooley Street London Southwark	188A Tooley Street London Southwark
152 Tooley Street London Southwark	35 Sandringham House Earls Way London
44 Sandringham House Earls Way London	42 Sandringham House Earls Way London
39 Sandringham House Earls Way London	37 Sandringham House Earls Way London
43 Sandringham House Earls Way London	Flat 5 1 Shand Street London
41 Sandringham House Earls Way London	38 Sandringham House Earls Way London
45 Sandringham House Earls Way London	Flat 1 1 Shand Street London
Flat 4 1 Shand Street London	Flat 3 1 Shand Street London
The Horace Jones Vault Shad Thames London	20 Blenheim House Crown Square London

29 Blenheim House Crown Square London	Blenheim House Crown Square London
22 Blenheim House Crown Square London	The Hard Hat Cafe Ltd 1 Tower Bridge Road London
Basement 226 Tower Bridge Road London	12 Hanover House Crown Square London
9 Hanover House Crown Square London	6 Hanover House Crown Square London
12 Blenheim House Crown Square London	3 Hanover House Crown Square London
38 Blenheim House Duchess Walk London	42 Blenheim House Duchess Walk London
15 Blenheim House Crown Square London	18 Blenheim House Crown Square London
30 Blenheim House Crown Square London	26 Blenheim House Crown Square London
27 Blenheim House Crown Square London	4 Hanover House Crown Square London
13 Hanover House Crown Square London	2 Hanover House Crown Square London
7 Hanover House Crown Square London	33 Blenheim House Duchess Walk London
36 Blenheim House Duchess Walk London	37 Blenheim House Duchess Walk London
The Scoop The Queens Walk London	36 Sandringham House Earls Way London
32 Sandringham House Earls Way London	28 Sandringham House Earls Way London
27 Sandringham House Earls Way London	22 Sandringham House Earls Way London
89 Balmoral House Earls Way London	88 Balmoral House Earls Way London
86 Balmoral House Earls Way London	74 Balmoral House Earls Way London
53 Balmoral House Earls Way London	34 Balmoral House Earls Way London
27 Balmoral House Earls Way London	18 Balmoral House Earls Way London
12 Balmoral House Earls Way London	11 Balmoral House Earls Way London
10 Balmoral House Earls Way London	7 Balmoral House Earls Way London

Flat 12 Lewes House Druid Street	3 Balmoral House Earls Way London
Flat 26 Lewes House Druid Street	Flat 22 Lewes House Druid Street
Flat 5 Lewes House Druid Street	52 St. Olaves Estate Druid Street London
28 St. Olaves Estate Druid Street London	10 St. Olaves Estate Druid Street London
37 St. Olaves Estate Druid Street London	Suite 174 First Floor 3 More London Riverside London
Suite 167 First Floor 3 More London Riverside London	Suite 144 First Floor 3 More London Riverside London
Suite 127 First Floor 3 More London Riverside London	West Part Fifth Floor 3 More London Riverside London
Ctp And Osa First Floor 3 More London Riverside London	East Part Second Floor 3 More London Riverside London
Ground Floor 4 More London Riverside London	Seventh Floor 4 More London Riverside London
7 Windlesham House Duchess Walk London	31 Horace Jones House Duchess Walk London
24 Horace Jones House Duchess Walk London	22 Horace Jones House Duchess Walk London
20 Horace Jones House Duchess Walk London	4 Horace Jones House Duchess Walk London
19 Blenheim House Crown Square London	14 Blenheim House Crown Square London
13 Blenheim House Crown Square London	2 Blenheim House Crown Square London
43 Blenheim House Duchess Walk London	41 Blenheim House Duchess Walk London
9 Godwin House Still Walk London	6 Godwin House Still Walk London
1 Godwin House Still Walk London	Flat 1 2 Fair Street London
Flat 6 2 Fair Street London	40 Devon Mansions Tooley Street London
33 Devon Mansions Tooley Street London	24 Devon Mansions Tooley Street London
3 Duchess Walk London Southwark	96 Tudor House 1 Duchess Walk London
93 Tudor House 1 Duchess Walk London	80 Tudor House 1 Duchess Walk London
79 Tudor House 1 Duchess Walk London	78 Tudor House 1 Duchess Walk London
61 Tudor House 1 Duchess Walk London	58 Tudor House 1 Duchess Walk London

53 Tudor House 1 Duchess Walk London	52 Tudor House 1 Duchess Walk London
41 Tudor House 1 Duchess Walk London	35 Tudor House 1 Duchess Walk London
27 Tudor House 1 Duchess Walk London	31 Tudor House 1 Duchess Walk London
30 Tudor House 1 Duchess Walk London	28 Tudor House 1 Duchess Walk London
14 Tudor House 1 Duchess Walk London	11 Tudor House 1 Duchess Walk London
2 Tudor House 1 Duchess Walk London	Unit 4 3 2 Still Walk London
Flat 35 Admirals Court 30 Horselydown Lane	Flat 31 Admirals Court 30 Horselydown Lane
Flat 27 Admirals Court 30 Horselydown Lane	Flat 22 Admirals Court 30 Horselydown Lane
Flat 21 Admirals Court 30 Horselydown Lane	Flat 20 Admirals Court 30 Horselydown Lane
Flat 17 Admirals Court 30 Horselydown Lane	Flat 6 Admirals Court 30 Horselydown Lane
Flat 5 Admirals Court 30 Horselydown Lane	Flat 4 Admirals Court 30 Horselydown Lane
25 Sandringham House Earls Way London	21 Sandringham House Earls Way London
16 Sandringham House Earls Way London	11 Sandringham House Earls Way London
9 Sandringham House Earls Way London	81 Balmoral House Earls Way London
78 Balmoral House Earls Way London	75 Balmoral House Earls Way London
70 Balmoral House Earls Way London	66 Balmoral House Earls Way London
63 Balmoral House Earls Way London	55 Balmoral House Earls Way London
51 Balmoral House Earls Way London	32 Balmoral House Earls Way London
22 Balmoral House Earls Way London	9 Balmoral House Earls Way London
8 Balmoral House Earls Way London	Flat 20 Lewes House Druid Street
Flat 14 Lewes House Druid Street	Flat 11 Lewes House Druid Street
Flat 4 Lewes House Druid Street	Flat 2 Lewes House Druid Street
26 St. Olaves Estate Druid Street London	11 St. Olaves Estate Druid Street London
40 St. Olaves Estate Druid Street London	3 St. Olaves Estate Druid Street London
Suite 178 First Floor 3 More London	Suite 164 First Floor 3 More London

Riverside London	Riverside London
Suite 163 First Floor 3 More London Riverside London	Suite 155 First Floor 3 More London Riverside London
Suite 145A First Floor 3 More London Riverside London	Suite 109A First Floor 3 More London Riverside London
Suite 140 First Floor 3 More London Riverside London	Suite 133 First Floor 3 More London Riverside London
Suite 121 First Floor 3 More London Riverside London	Suite 105 First Floor 3 More London Riverside London
Suite 103 First Floor 3 More London Riverside London	East Part Fifth Floor 3 More London Riverside London
Risk Advisory Third Floor 3 More London Riverside London	East Part Third Floor 3 More London Riverside London
Level 1 Basement 3 More London Riverside London	Fourth Floor And Part Fifth 4 More London Riverside London
10 Windlesham House Duchess Walk London	43 Horace Jones House Duchess Walk London
25 Horace Jones House Duchess Walk London	21 Horace Jones House Duchess Walk London
Ground Floor 226 Tower Bridge Road London	Basement And Ground Floor 222 Tower Bridge Road London
11 Blenheim House Crown Square London	8 Blenheim House Crown Square London
4 Godwin House Still Walk London	3 Godwin House Still Walk London
Flat 13 2 Fair Street London	Flat 17 2 Fair Street London
Flat 7 2 Fair Street London	50 Devon Mansions Tooley Street London
44 Devon Mansions Tooley Street London	43 Devon Mansions Tooley Street London
39 Devon Mansions Tooley Street London	27 Devon Mansions Tooley Street London
21 Devon Mansions Tooley Street London	18 Devon Mansions Tooley Street London
11 Devon Mansions Tooley Street London	91 Tudor House 1 Duchess Walk London
87 Tudor House 1 Duchess Walk London	86 Tudor House 1 Duchess Walk London
76 Tudor House 1 Duchess Walk London	67 Tudor House 1 Duchess Walk London
65 Tudor House 1 Duchess Walk London	60 Tudor House 1 Duchess Walk London
59 Tudor House 1 Duchess Walk London	49 Tudor House 1 Duchess Walk London

48 Tudor House 1 Duchess Walk London	45 Tudor House 1 Duchess Walk London
40 Tudor House 1 Duchess Walk London	26 Tudor House 1 Duchess Walk London
25 Tudor House 1 Duchess Walk London	24 Tudor House 1 Duchess Walk London
22 Tudor House 1 Duchess Walk London	20 Tudor House 1 Duchess Walk London
18 Tudor House 1 Duchess Walk London	Flat 14 Admirals Court 30 Horselydown Lane
10 Tudor House 1 Duchess Walk London	3 Tudor House 1 Duchess Walk London
Flat 26 Admirals Court 30 Horselydown Lane	Flat 9 Admirals Court 30 Horselydown Lane
34 Horselydown Lane London Southwark	31 Sandringham House Earls Way London
19 Sandringham House Earls Way London	83 Balmoral House Earls Way London
76 Balmoral House Earls Way London	65 Balmoral House Earls Way London
60 Balmoral House Earls Way London	50 Balmoral House Earls Way London
48 Balmoral House Earls Way London	35 Balmoral House Earls Way London
15 Balmoral House Earls Way London	5 Balmoral House Earls Way London
Flat 29 Lewes House Druid Street	Flat 17 Lewes House Druid Street
Flat 7 Lewes House Druid Street	Flat 1 Lewes House Druid Street
47 St. Olaves Estate Druid Street London	25 St. Olaves Estate Druid Street London
24 St. Olaves Estate Druid Street London	8 St. Olaves Estate Druid Street London
38 St. Olaves Estate Druid Street London	46 St. Olaves Estate Druid Street London
5 St. Olaves Estate Druid Street London	1 St. Olaves Estate Druid Street London
Suite 176 First Floor 3 More London Riverside London	Suite 169 First Floor 3 More London Riverside London
Suite 165 First Floor 3 More London Riverside London	Suite 161 First Floor 3 More London Riverside London
Suite 153 First Floor 3 More London Riverside London	Suite 149 First Floor 3 More London Riverside London
Suite 129 First Floor 3 More London Riverside London	Suite 125 First Floor 3 More London Riverside London
Suite 117 First Floor 3 More London Riverside London	Suite 106 First Floor 3 More London Riverside London

Office A Second Floor 3 More London Riverside London	Eighth Floor 4 More London Riverside London
1 Queen Elizabeth Street London Southwark	8 Windlesham House Duchess Walk London
1 Windlesham House Duchess Walk London	36 Horace Jones House Duchess Walk London
26 Horace Jones House Duchess Walk London	17 Horace Jones House Duchess Walk London
31 Balmoral House Earls Way London	64 Balmoral House Earls Way London
57 Balmoral House Earls Way London	49 Balmoral House Earls Way London
26 Balmoral House Earls Way London	24 Balmoral House Earls Way London
16 Balmoral House Earls Way London	13 Balmoral House Earls Way London
2 Balmoral House Earls Way London	1 Weavers Lane London Southwark
Flat 15 Lewes House Druid Street	Flat 8 Lewes House Druid Street
44 St. Olaves Estate Druid Street London	22 St. Olaves Estate Druid Street London
2 St. Olaves Estate Druid Street London	Suite 179 First Floor 3 More London Riverside London
Suite 177 First Floor 3 More London Riverside London	Suite 171 First Floor 3 More London Riverside London
Suite 128 First Floor 3 More London Riverside London	Suite 126 First Floor 3 More London Riverside London
Suite 119 First Floor 3 More London Riverside London	Suite 118 First Floor 3 More London Riverside London
Suite 115 First Floor 3 More London Riverside London	Part Fifth To Ninth Floor 3 More London Riverside London
First Floor 3 More London Riverside London	Communications Room First Floor 3 More London Riverside London
12 Windlesham House Duchess Walk London	11 Windlesham House Duchess Walk London
6 Windlesham House Duchess Walk London	3 Windlesham House Duchess Walk London
Flat 2 1 Shand Street London	Bridge Masters Residence Tower Bridge Tower Bridge Road
41 Horace Jones House Duchess Walk London	39 Horace Jones House Duchess Walk London

18 Horace Jones House Duchess Walk London	15 Horace Jones House Duchess Walk London
14 Horace Jones House Duchess Walk London	12 Horace Jones House Duchess Walk London
3 Blenheim House Crown Square London	10 Blenheim House Crown Square London
7 Blenheim House Crown Square London	1 Blenheim House Crown Square London
35 Blenheim House Duchess Walk London	21 Blenheim House Crown Square London
11 Hanover House Crown Square London	10 Hanover House Crown Square London
8 Hanover House Crown Square London	6 Blenheim House Crown Square London
4 Potters Fields London Southwark	16 Hanover House Crown Square London
The Health Club And Spa Chatsworth House Duchess Walk	City Hall 110 The Queens Walk London
24 Blenheim House Crown Square London	3 Potters Fields London Southwark
15 Hanover House Crown Square London	Flat 14 2 Fair Street London
Flat 18 2 Fair Street London	49 Devon Mansions Tooley Street London
45 Devon Mansions Tooley Street London	7 Devon Mansions Tooley Street London
5 Devon Mansions Tooley Street London	42 Devon Mansions Tooley Street London
37 Devon Mansions Tooley Street London	29 Devon Mansions Tooley Street London
26 Devon Mansions Tooley Street London	22 Devon Mansions Tooley Street London
20 Devon Mansions Tooley Street London	19 Devon Mansions Tooley Street London
12 Devon Mansions Tooley Street London	2 Still Walk London Southwark
7 Duchess Walk London Southwark	6 Duchess Walk London Southwark
Second Floor 150 Tooley Street London	Living Accommodation The Bridge Lounge 186 Tooley Street
94 Tudor House 1 Duchess Walk London	83 Tudor House 1 Duchess Walk London
73 Tudor House 1 Duchess Walk London	70 Tudor House 1 Duchess Walk London
64 Tudor House 1 Duchess Walk London	57 Tudor House 1 Duchess Walk London
56 Tudor House 1 Duchess Walk London	36 Tudor House 1 Duchess Walk London
29 Tudor House 1 Duchess Walk London	5 Tudor House 1 Duchess Walk London

Flat 32 Admirals Court 30 Horselydown Lane	Flat 29 Admirals Court 30 Horselydown Lane
Flat 23 Admirals Court 30 Horselydown Lane	Flat 18 Admirals Court 30 Horselydown Lane
Flat 11 Admirals Court 30 Horselydown Lane	Flat 3 Admirals Court 30 Horselydown Lane
Flat 12A Admirals Court 30 Horselydown Lane	Staff Accommodation 20A Horselydown Lane London
34 Sandringham House Earls Way London	33 Sandringham House Earls Way London
23 Sandringham House Earls Way London	3 Sandringham House Earls Way London
1 Sandringham House Earls Way London	79 Balmoral House Earls Way London
69 Balmoral House Earls Way London	

## APPENDIX 5

### **Consultation responses received**

#### **Internal services:**

LBS Design & Conservation Team

LBS Transport Policy

LBS Highways Development & Management

LBS Ecology

LBS Urban Forester

LBS Planning Policy

#### **Statutory and non-statutory organisations:**

Transport for London

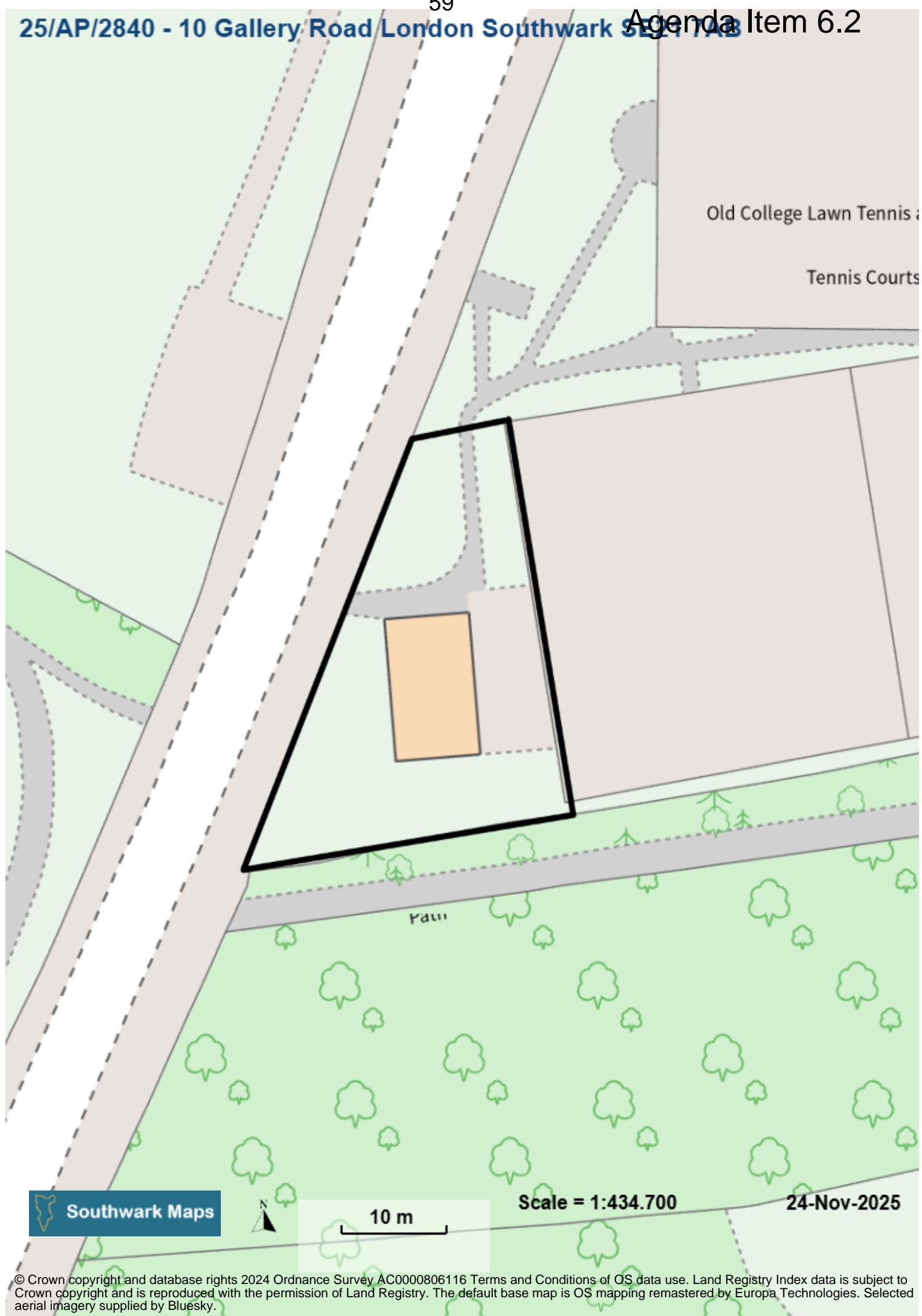
Metropolitan Police Service

#### **Neighbour and local groups consulted:**

7 Horace Jones House Duchess Walk London

Flat 15 2 Fair Street London

24 Devon Mansions Tooley Street London



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<b>Meeting Name:</b>	Planning Committee (Smaller Applications)
<b>Date:</b>	8 December 2025
<b>Report title:</b>	<p><b>Development Management planning application:</b> Application 25/AP/2840 for: Full Planning Application</p> <p><b>Address:</b> 10 Gallery Road, London, Southwark SE21 7AB</p> <p><b>Proposal:</b> Demolition of the existing shed/storage structure. Refurbishment of the existing clubhouse building. Erection of a lean-to on the existing clubhouse building. Erection of a single-storey side extension to the existing clubhouse building. Alterations to site access/egress for accessibility purposes. Provision of plant equipment and additional cycle storage. Associated works and landscaping inside the application site.</p>
<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
<b>Application Start Date:</b> 07.10.2025	<b>Application Expiry Date:</b> 12.12.2025
<b>Earliest Decision Date:</b> 06.11.2025	

## RECOMMENDATION

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

## EXECUTIVE SUMMARY

2. The application site lies within metropolitan open land; the site is within a conservation area and features 18 trees. The proposal seeks permission for extensions to an existing clubhouse building with landscaping and habitat enhancement works.
3. The main material considerations in the planning assessment are land use,

design, layout, heritage assets, neighbouring amenity, landscaping, trees, biodiversity net gain (BNG), ecology and noise. The proposed development is in general compliance with planning policy and it is recommended planning permission be granted, subject to conditions.

## BACKGROUND INFORMATION

### Site location and description

4. The application site comprises an outdoor recreation and sport facility (use class F2(c)) known locally as 'Old College Lawn Tennis Club [OCLTC]'. The facility includes 8 tennis courts with floodlights. The application property is not listed, nor does it form the setting of any listed buildings. The site is located within a conservation area, known as Dulwich Village. There are trees and shrubbery forming a natural border around the site.
5. The site is subject to the following planning designations:
  - Community Infrastructure Levy (CIL) Zone - CIL Zone 2
  - Conservation Area (CA) - Dulwich Village
  - Adopted Highway (LB Southwark) - Gallery Road
  - Metropolitan Open Land (MOL)
  - Area Visions - AV.07 Dulwich
  - Air Quality Management Area
  - Critical Drainage Areas - Herne Hill

### The surrounding area

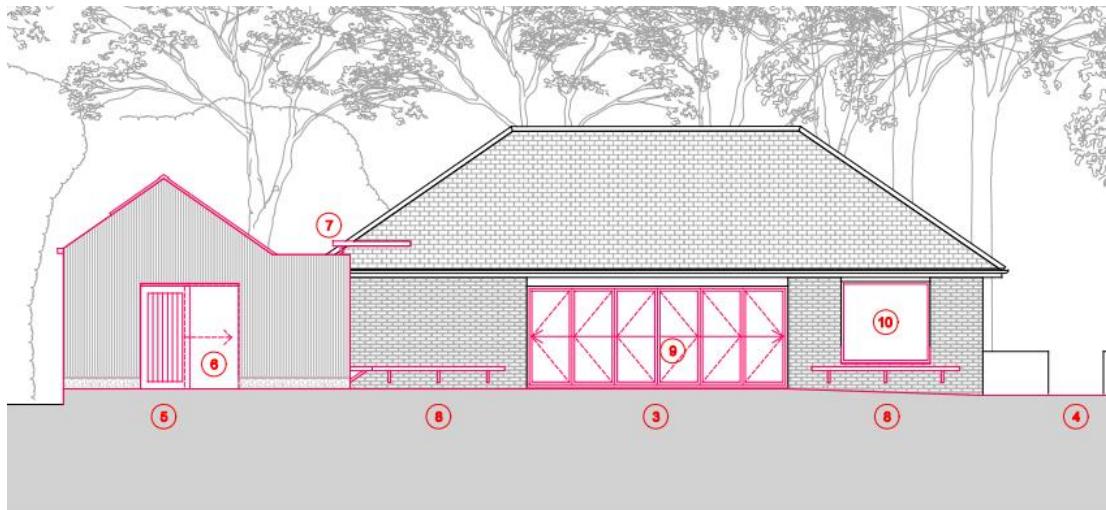
6. The surrounding area comprises a mix of uses: residential dwellings, a school, an event space, an art gallery and outdoor recreation/sport spaces.
7. To the north: Dulwich Picture Gallery  
 To the east: 1-22 College Gardens  
 To the south: Lovers Walk/Dulwich Preparatory School  
 To the west: Gallery Road/Belair House

### Details of proposal

8. Description of development

Demolition of the existing shed/storage structure. Refurbishment of the existing clubhouse building. Erection of a lean-to on the existing clubhouse building. Erection of a single-storey side extension to the existing clubhouse building. Alterations to site access/egress for accessibility purposes. Provision of plant equipment and additional cycle storage. Associated works and landscaping inside the application site.

9.



#### 10. Further briefing notes

The Biodiversity Net Gain (BNG) Metric was amended to better reflect site conditions.

#### Planning history

11. See below for any relevant planning history of the application site.

12.

<u>Reference</u>	<u>Description of development</u>	<u>Decision</u>	<u>Date</u>
83/AP/0041	Erection of a floodlighting system on two of the clubs existing play deck surface tennis courts at old college lawn tennis croquet club, Gallery Road, London	GRMIN	07.03.1983
83/AP/1430	Demolition of existing club house and erection of a single storey replacement house at Old College Lawn Tennis Club, Gallery Road	GRMIN	24.11.1983
85/AP/0465	The erection of a prefabricated concrete storage shed and associated timber screen fence at the Old College lawn tennis club, Gallery Road	GRMIN	27.03.1985
92/AP/0636	Installation of 9 x 6.1m high poles floodlighting tennis court	GRMIN	21.10.1992
93/AP/0270	Variation of condition 2 Flood lighting extension to 21:00 hrs	GRMIN	14.07.1993

93/AP/0719	AOD - screening retails	GRAOD	18.10.1993
21/AP/2615	Construction of tennis court, erection of perimeter fencing, installation of x3 LED floodlights, extension of x3 existing LED floodlight arms and removal of x4 trees.	GRMIN	02.02.2022
85/AP/0519	Approval of colour of storage hut	GRAOD	25.04.1985
19/AP/1573	Variation of condition 2 (approved plans) pursuant to planning permission 12/AP/1573 for:  Relocation of 4 floodlighting posts around tennis courts 4 and 5 and use of floodlighting for courts 1-5 between the hours of 08:00 to 21:30 Monday to Saturday and for courts 1, 2 and 3 between the hours of 08:00 to 20:30 on Sunday.  The Variation is for an increase in height by 0.5m of floodlighting posts around tennis courts 1,2,3,4 & 5. The existing floodlights would be replaced with LED luminaires, with associated new hoods.	GRMIN	19.09.2019
17/AP/4258	Installation of LED floodlights to courts nos.6 and 7 for use Monday to Saturday 8:00 to 21:00. Extension of use of existing floodlights on courts nos. 4 and 5 on Sunday 8:00 to 20:30.	GRA	12.03.2018
12/AP/1573	Relocation of 4 floodlighting posts around tennis courts 4 and 5 and use of floodlighting for courts 1-5 between the hours of 08:00 to 21:30 Monday to Saturday and for courts 1, 2 and 3 between the hours of 08:00 to 20:30 on Sunday.	GRA	18.07.2012
11/AP/0815	Replacement of the existing pair of timber gates for vehicle access with a pair of wrought iron gates for vehicle access and a wrought iron pedestrian access gate.	GRA	07.06.2011

09/AP/1372	To provide floodlighting to Court no.3 with 3no. new lighting posts; repositioning of 3no. existing posts next to Court no2; repositioning of 2no lighting posts to Court no1; relocation of gate and new gate in wire mesh fencing.	GRA	08.09.2009
06/AP/0392	Variation of condition 2 of planning consent 03AP1473 to extend the floodlight time by one hour to 9pm on courts 4 and 5 on Monday to Saturday	GRA	11.09.2006
04/AP/0379	Details of the floodlight installation and shields as required by condition 4 of planning permission dated 13/11/2003 LBS Reg.03-AP-1473 for the erection of nine 6.1m high floodlights to serve tennis courts nos. 4 & 5.	GRAOD	24.05.2004
04/AP/0902	Details of screening as required by condition 5 of planning permission dated 13/11/2003 LBS Reg. 03/AP/1473 for the erection of nine 6.1m high floodlights to serve two tennis courts.	GRAOD	14.07.2004
03/AP/1473	The erection of nine 6.1m high floodlights to serve two tennis courts.	GRA	13.11.2003

## KEY ISSUES FOR CONSIDERATION

### Summary of main issues

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

- Principle of the proposed development in terms of land use
- Design, layout and heritage assets
- Neighbouring amenity
- Landscaping and trees
- Biodiversity Net Gain (BNG)
- Ecology and biodiversity
- Noise and vibration
- Other considerations

- Mayoral and borough community infrastructure levy (CIL)
- Community impact and equalities assessment
- Human rights and
- Positive and proactive statement.

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

### **Legal Context**

15. 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 Southwark Plan 2022 and the London Plan 2021.

16. 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**

#### **National Planning Policy Framework 2024**

17. The revised National Planning Policy Framework ('NPPF') was published on 12 December 2024 which sets out the national planning policy and how this needs to be applied. The NPPF focuses on sustainable development with three key objectives - economic, social and environmental.

18. Paragraph 231 states that the policies in the Framework are material considerations which should be considered in dealing with applications.

19. The policies of relevance in respect of this application are:

- Chapter 2 Achieving sustainable development
- Chapter 8 Promoting healthy and safe communities
- Chapter 11 Making effective use of land
- Chapter 12 Achieving well-designed places
- Chapter 13 Protecting green belt land
- Chapter 15 Conserving and enhancing the natural environment
- Chapter 16 Conserving and enhancing the historic environment

#### **The London Plan 2021**

20. The policies of relevance in respect of this application are:

- Policy D4 Delivering good design
- Policy D12 Fire safety

- Policy D14 Noise
- Policy HC1 Heritage conservation and growth
- Policy G3 Metropolitan Open Land
- Policy G6 Biodiversity and access to nature
- Policy G7 Trees and woodlands

### **Southwark Plan 2022**

21. The policies of relevance in respect of this application are:

- P13 Design of places
- P14 Design quality
- P18 Efficient use of land
- P20 Conservation areas
- P21 Conservation of the historic environment and natural heritage
- P47 Community uses
- P56 Protection of amenity
- P57 Open space
- P60 Biodiversity
- P61 Trees

### **Supplementary Planning Documents (SPDs) and other documents of material relevance**

22. Of relevance in the consideration of this application are:

- Dulwich SPD (2013)
- Heritage SPD (2021)
- Dulwich Wood Conservation Area Appraisal (2006)

## **ASSESSMENT**

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

23. The application site comprises an outdoor recreation and sport facility (use class F2(c)). There is a clubhouse building on-site that is considered ancillary to the primary use of the site. The proposal seeks permission for extensions to the club house building (along with demolition of an existing shed/storage structure and associated landscaping/access works). There is no material change in use of the land or buildings proposed. The application site lies on land designated as metropolitan open land (MOL) which is considered the green belt for planning land use purposes.

24. The NPPF sets out that development in the greenbelt is inappropriate, unless one of the exceptions, set out in the framework, applies. In the case of the proposal, two of the exceptions may apply:

- the provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings, for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; if the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it; and
- the extension or alteration of a building if it does not result in disproportionate additions over and above the size of the original building.

25. The London Plan sets out Metropolitan Open Land (MOL) is afforded the same status and level of protection as Green Belt:

- MOL should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt.

26. The Southwark Plan sets out development will not be permitted on Metropolitan Open Land (MOL) or Borough Open Land (BOL). In exceptional circumstances development may be permitted on MOL or BOL when:

- It consists of ancillary facilities that positively contribute to the setting, accessibility and quality of the open space and if it does not affect its openness or detract from its character. Ancillary facilities on MOL must be essential for outdoor sport or recreation, cemeteries or for other uses of land which preserve the openness of MOL and do not conflict with its MOL function; or
- It consists of the extension or alteration of an existing building providing that it does not result in disproportionate additions over and above the size of the original building; or
- It consists of the replacement of an existing building, provided that the new building is no larger than the building it replaces.

27. The policies set out in the NPPF and the London Plan differ slightly to those set out in the Southwark Plan. Although the policy wording differs slightly, the policies are still broadly consistent with those set out in the framework, particularly for the type of development proposed (i.e. extension to an existing building/provision for outdoor recreation and sport).

28. The policy test for the extension or alteration of an existing building requires an assessment as to whether the extension or alteration of a building results in disproportionate additions over and above the size of the original building. Whereas the policy test for outdoor sport and recreation facilities requires an assessment as to whether the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.

29. It is considered the proposed development is not inappropriate development within the green belt. The proposed development potentially meets two of the exceptions for green belt development. Adopted policy (both NPPF and Southwark Plan) require only one exception to be met for development to be

considered not inappropriate.

30. As such, an assessment is made only against the green belt development exception for an extension or alteration of an existing building. It is considered the proposed development does not result in disproportionate additions over and above the size of the original building. The extended building footprint is smaller than the size of the original building and the height is lower.
31. As such, the proposed development is not inappropriate within the green belt, and no harm has been identified in terms of land use.

### **Design, layout and heritage assets**

32. The Planning (Listed Buildings and Conservation Areas) Act 1990 outlines the general duties placed upon the LPA, in exercise of planning functions, for listed buildings and conservation areas. The duty for listed buildings is covered in s.66(1) 'the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses'. The duty for conservation areas is covered in s.72(1) 'special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area'. The NPPF provides a mechanism for assessing levels of harm versus public benefit. London Plan and Southwark Plan policies echo the statutory requirements above.
33. The site includes a clubhouse and 8 tennis courts and is part of the Dulwich Village Conservation Area. Located at the corner where Lover's Walk meets Gallery Road, the existing clubhouse is single storey with a hipped roof, screened by mature vegetation. It is constructed in 1986 with red bricks in a simple and utilitarian design. The property is not listed or locally listed nor does it form the setting of a listed building (statutory or locally).
34. Internal alterations will have no impact on the character and appearance of conservation area. The proposal includes replacements to the windows and doors on the east and west elevations. There will be minor enlargements to the windows and doors on the east elevation. Overall, the enlargement is minor and will have minimal impact on the overall appearance of the building. The proposed modern design for the windows is appropriate, and a planning condition is recommended to secure detail designs.
35. An extension to the south is proposed and will be used as a changing block. It will replace the standalone garage and forms a T-shaped layout with the existing clubhouse. Demolition of the garage is acceptable as it makes little contribution to the character of the conservation area. The proposed extension is single storey with a pitched roof and 4 rooflights to the ridge as well as a section of fixed glazing. It is subservient to the main clubhouse in height and will unlikely affect the appearance of the conservation area especially given its discreet location behind mature vegetation. Material samples for the new extension are to be secured via planning condition.

36. Other elements of the work include landscaping, the erection of a lean-to on the clubhouse building where new plant equipment and cycle storage will be housed. These works are minor in nature and will not impact the setting of the conservation area.
37. The Design and Conservation Team raised no objection to the proposed development, subject to conditions. The proposed development preserves the character and appearance of Dulwich Village CA.

### **Neighbouring amenity**

38. Privacy  
The proposed development is located a considerable distance from any neighbouring building. As such, there are no material privacy impacts anticipated.
39. Daylight and sunlight  
The proposed development is located a considerable distance from any neighbouring building. As such, there are no material daylight and sunlight impacts anticipated.
40. Openness and outlook  
The proposed development is located a considerable distance from any neighbouring building. As such, there are no material openness and outlook impacts anticipated.
41. Overall, the amenity of neighbouring occupiers will not be materially impacted.

### **Landscaping and trees**

42. The submission proposes minor landscaping works, including resurfacing existing non-permeable hard standing with permeable resin bound gravel. Further works are proposed to improve accessibility and path gradients across the site. Habitat enhancement works are also proposed but these are discussed separately within the biodiversity net gain section and will be secured via condition.
43. The applicant has provided an Arboricultural Impact Assessment (AIA) to support their application in regard to trees. The assessment has been prepared in accordance with the established best practice guidelines (i.e. BS5837). The assessment outlines there are 18No. trees on the application site:
  - 1No. Category A
  - 4No. Category B
  - 10No. Category C
  - 3No. Category U

44. Category A trees are of high quality, B are of moderate quality, and C are of low quality, Category U trees are those with a serious defect or decline and are considered to be unviable, meaning they have a high risk of imminent loss and are not recommended for retention.
45. The development proposes the removal of 5No. trees:
  - 2No. Category C
  - 3No. Category U

The remainder of tree works are limited to crown lifts and general trimming as set out in the submitted assessment. All remaining trees will be protected during construction, in accordance with the submitted Arboriculture Method Statement (AMS) - which will be secured via planning condition.

46. The Urban Forestry Team raised no objection to the proposed works, subject to planning condition. The loss of Category U and Category C trees is adequately mitigated via the proposed habitat plan.

### **Biodiversity Net Gain (BNG)**

47. In England, BNG is mandatory under Schedule 7A of the Town and Country Planning Act 1990. Developers must deliver a BNG of 10%. This means a development will result in more or better-quality natural habitat than there was before development. The applicant has provided the Statutory Biodiversity Metric to support their application, along with existing and proposed habitat outline plans.
48. The existing on-site baseline is as follows:
  - Area habitat units: 0.86
  - Hedgerow units: 0.36
  - Watercourse units: 0.00
49. The proposed on-site baseline is as follows:
  - Area habitat units: 0.96
  - Hedgerow units: 0.40
  - Watercourse units: 0.00
50. The total net change (%) is as follows:
  - Area habitat units: 10.47%
  - Hedgerow units: 11.29%
  - Watercourse units: 0.00%

The BNG is not considered to be 'significant' for the purposes of the legislation.

51. There are 3 ways a developer can achieve BNG but the hierarchy below must be followed:
  1. They can create biodiversity on-site (within the red line boundary of a development site).
  2. If developers cannot achieve all of their BNG on-site, they can deliver through a mixture of on-site and off-site. Developers can either make off-site biodiversity gains on their own land outside the development site, or buy off-site biodiversity units on the market.
  3. If developers cannot achieve on-site or off-site BNG, they must buy statutory biodiversity credits from the government. This should be a last resort. The government will use the revenue to invest in habitat creation in England.
52. The proposed development adheres to the BNG hierarchy by creating biodiversity on-site within the redline boundary (No.1). It is not anticipated that off-site (No.2) or statutory credits (No.3) will be required in this instance. The development will be subject to the biodiversity gain plan condition (BGP) to ensure the statutory requirement of a 10% biodiversity net gain is met.

### **Ecology and biodiversity**

53. In addition to the statutory biodiversity net gain (BNG) outlined above, there are other considerations with respect to biodiversity, as set out in adopted policy. To support their application the applicant has provided a Preliminary Ecological Appraisal (PEA). The report provides recommendations in respect of species and habitat protection, as well recommending the provision of bird and bat boxes. Planning conditions shall be used to secure both.

### **Noise and vibration**

54. The proposal seeks to introduce plant equipment (an air source heat pump). The location of the plant equipment is a considerable distance (>100m) from the nearest noise sensitive receptor (the dwellings at College Gardens). The provision of additional clubhouse facilities (changing rooms, toilets, staff office/store and a medical room etc.) is unlikely to give rise to a material uplift in members/visitor numbers. As such, the proposal will result in no material impact on neighbouring amenity. Noise creep due to plant equipment can also impact the local environment and soundscape, as such a condition is recommended to ensure the ASHP noise levels remain within appropriate levels.

### **Other considerations**

55. Transport, highways and construction

The application seeks permission for modest extension to the existing outdoor

sport and recreation facility to provide additional facilities (changing rooms, toilets, staff office/store and a medical room etc.). The proposed development will not result in a material increase in trip generation to/from the site. The size of the extension does not trigger any policy requirements to provide any additional cycle parking. Notwithstanding the applicant has proposed to introduce a small bike store, which is viewed positively and will help to encourage additional active travel to and from the site. The scale of development is modest, further mitigation for construction impact and logistics are not required, beyond the aforementioned conditions to protect trees, ecology and biodiversity.

56. Air quality

Adopted policy requires all development be air quality neutral (AQN). Development can be assumed to be AQN if it does not create additional car parking; and does not lead to an increase in localised car journeys; and does not include new combustion plants such as gas-fired boilers. As such, the proposal is considered to meet adopted policy requirements with respect to air quality and no further information or assessments have been requested.

57. Fire safety

A Planning Fire Safety Strategy (PFSS) has been provided for this proposal. The statement covers matters required by planning policy. This is in no way a professional technical assessment of the fire risks presented by the development.

58. Energy and sustainability

Development must minimise carbon emissions on site in accordance with the following energy hierarchy: 1. Be lean (energy efficient design and construction); then 2. Be clean (low carbon energy supply); then 3. Be green (on site renewable energy generation and storage). The building will be constructed to the latest iteration of building regulations and features an air source heat pump/mechanical ventilation heat recovery, both of which meet the 'be lean' first tier of the hierarchy.

59. Ground conditions and contamination

The site has had various structures in situ since approximately 1920s, records of past structures are limited, and some historic building materials have been found to be hazardous to health. Adopted policy requires that contaminated land be sufficiently mitigated. As such, a condition is recommended to ensure any unexpected land contamination is sufficiently remediated.

60. Water resources and flood risk

The application site lies within a critical drainage area, but the scale of the proposed development does not trigger any requirements for further flood risk information. Notwithstanding, it is likely the proposed development will have

negligible effect in relation to the critical drainage area. Although the development introduces extensions, an existing area of non-permeable hard standing (which exceeds the footprint of the proposed extensions) will be replaced with permeable resin bound gravel.

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

61. The development is not CIL liable.

## **CONSULTATION RESPONSES**

### **Consultation responses from members of the public**

62. Summarised below are the material planning considerations raised by members of the public.
63.
  - No letters of objection.
  - Two letters of support.
64. The application was publicised in accordance with The Town and Country Planning (Development Management Procedure) (England) Order 2015 and the locally adopted Statement of Community Involvement (SCI) 2025.
65.
  - Neighbour letters were sent to properties (22No.) within a 150m radius of the application red line boundary.
  - A site notice was displayed on Gallery Road fronting the site.
  - A press notice was published in Southwark News.
66. These matters are addressed comprehensively in the relevant preceding parts of this report.

### **Consultation responses from internal and divisional consultees**

67. Summarised below are the material planning considerations raised by internal and divisional consultees, along with the officer's response.
68.
  - Ecology Team (ECOLOG) - No objection, subject to conditions. Development is BNG applicable.
  - Design and Conservation Team (DES) - No objection, subject to conditions.
  - Urban Forestry Team (URBA) - No objection, subject to conditions.
  - Transport Policy Team (TRA) - Further information requested.
  - Highways Development Team (HDM) - Further information requested.
  - Environmental Protection Team (EPT) - No comment received.
69. Office comment: Conditions have been applied where they meet the relevant tests set out in the NPPF. Additional information has been sought where commensurate to the scale of development (i.e. minor extensions and

landscaping).

### **Consultation responses from external consultees**

70. Summarised below are the material planning considerations raised by external consultees.
71.
  - No external consultees required.
72. These matters are addressed comprehensively in the relevant preceding parts of this report.

### **Community impact and equalities assessment**

73. The Council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights.
74. The Council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.
75. 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:
  - The need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act
  - 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
  - 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.
76. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.

## Human rights implications

77. 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.
78. 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

79. The council has published its development plan on its website together with advice about how applications are considered and the information that needs to be submitted to ensure timely consideration of an application. Applicants are advised that planning law requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise.
80. 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 submissions that are in accordance with the application requirements.

<b>Positive and proactive engagement: summary table</b>	
Was the pre-application service used for this application?	Yes - 24/EQ/0198
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 - BNG information sought.
To help secure a timely decision, did the case officer submit their recommendation in advance of the statutory determination date?	Yes

## Site visits

82. The case officer undertook a site visit (outside the site only) to display a site notice and to assess area context.

## CONCLUSION

83. The development is not inappropriate on metropolitan open land (MOL). The design is modern in appearance but acceptable subject to detail design and material conditions. The character and appearance of Dulwich Village conservation area is preserved. There will be no material impact on neighbouring amenity (in terms of privacy, daylight, sunlight, openness and outlook impact). The proposed landscaping represents an improvement versus what exists in situ. The removal of trees (2No. Cat. C & 3No. Cat U) is acceptable and will be mitigated for within the habitat plan and the forthcoming biodiversity gain plan. The existing trees will be trimmed (where necessary) and protected during construction via condition. The development achieves the statutory biodiversity net gain (BNG) minimum of 10% and the uplift is provided on-site. Additional ecology/biodiversity protection and enhancement measured are secured by condition. Noise and vibration impacts are likely to be negligible, however a condition to avoid plant noise creep is recommended. Beyond the principal considerations, all other matters (transport, highways, construction, air quality, fire safety, energy, sustainability, ground conditions, contamination, water resources and flood risk) are acceptable and subject to conditions, where necessary. As such, it is recommended planning permission be granted, subject to conditions.

## 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: <a href="mailto:planning.enquiries@southwark.gov.uk">planning.enquiries@southwark.gov.uk</a> Council website: <a href="http://www.southwark.gov.uk">www.southwark.gov.uk</a>

## APPENDICES

No.	Title
Appendix 1	Recommendation (draft decision notice)
Appendix 2	Relevant planning policy
Appendix 3	Planning history of the site and nearby sites
Appendix 4	Consultation undertaken
Appendix 5	Consultation responses received

## AUDIT TRAIL

<b>Lead Officer</b>	Stephen Platts, Director of Planning and Growth	
<b>Report Author</b>	Sean Gomes, Planning Officer	
<b>Version</b>	Final	
<b>Dated</b>	20 November 2025	
<b>Key Decision</b>	No	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>		
Officer Title	Comments Sought	Comments included
Strategic Director, Resources	No	No
Strategic Director, Environment, Sustainability and Leisure	No	No
Strategic Director, Housing	No	No
<b>Date final report sent to Constitutional Team</b>	24 November 2025	

## APPENDIX 1

## Recommendation (draft decision notice)

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

Reference no./Plan or document name/Rev.

Received on:

633 P 20 PLAN: CLUBHOUSE: GROUND FLOOR: PROPOSED (Rev: REV P3)	02/10/2025
633 P 21 PLAN: CLUBHOUSE LOFT: PROPOSED (Rev: REV P3)	02/10/2025
633 P 22 PLAN: CLUBHOUSE ROOF: PROPOSED (Rev: REV P3)	02/10/2025
633 P 30 CLUBHOUSE: ELEVATION EAST: EXISTING AND PROPOSED (Rev: REV P3)	02/10/2025
633 P 31 CLUBHOUSE ELEVATION SOUTH EXISTING AND PROPOSED (Rev: REV P3)	02/10/2025
633 P 32 CLUBHOUSE: ELEVATION WEST: EXISTING AND PROPOSED (Rev: REV P3)	02/10/2025
633 P 33 CLUBHOUSE: ELEVATION NORTH: EXISTING AND PROPOSED (Rev: REV P3)	02/10/2025
633 P 34 CLUBHOUSE SECTION: EXISTING AND PROPOSED (Rev: REV P3)	02/10/2025
633 P 35 CLUBHOUSE & EXTENSION SECTION: PROPOSED (Rev: REV P3)	02/10/2025
633 P 52 ACCESSIBILITY PLAN SITE PROPOSED (Rev: REV P1)	02/10/2025
633 P 53 ACCESSIBILITY PLAN CLUBHOUSE AND EXTENSION: PROPOSED (Rev: REV P1)	02/10/2025
633 P 54 PLAN EXTERNAL WORKS FINISHES PROPOSED (Rev: REV P1)	02/10/2025
SE24-1181 PRELIMINARY ECOLOGICAL APPRAISAL - APPENDIX D (Rev: REV V.02)	02/10/2025
PJC/6738/24/01 ARBORICULTURAL IMPACT ASSESSMENT - APPENDIX B (Rev: REV -)	02/10/2025
633 P 51 HABITAT PLAN PROPOSED (Rev: REV P3)	19/11/2025

Reason:

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

**Permission is subject to the following Time Limit:**

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. Development may not be begun unless:
  - (a) a biodiversity gain plan (BGP) has been submitted to the planning authority; and
  - (b) the local planning authority (LPA) has approved the plan.

Once approved, biodiversity and habitat enhancement works shall be carried out in strict accordance with the approved document/plans, unless otherwise agreed in writing with the LPA.

Reason: To ensure the development delivers a Biodiversity Net Gain (BNG) on site in accordance with Schedule 7A of the Town and Country Planning Act (1990) and Southwark Plan (2022) Policy P60 (Biodiversity).

4. Prior to above grade works commencing, material samples of all external facing materials to be used in the carrying out of this permission shall be submitted to and approved in writing by the Local Planning Authority; the development shall not be carried out otherwise than in accordance with any

such approval given.

Reason: In order to ensure that these samples will make an acceptable contextual response in terms of materials to be used, and achieve a quality of design and detailing in accordance with the National Planning Policy Framework (2024); Policy D4 (Delivering Good Design) and Policy HC1 (Heritage Conservation and Growth) of the London Plan (2021); Policy P13 (Design of Places), Policy P14 (Design Quality) and Policy P20 (Conservation Areas) of the Southwark Plan (2022).

5. Prior to above grade works commencing, 1:5 or 1:10 section detail drawings complete with references back to the overall design and through shall be submitted to and approved in writing by the Local Planning Authority:
  - A. New and replacement windows
  - B. New and replacement doors
  - C. New rooflights

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

Reason: In order that the Local Planning Authority may be satisfied as to the design and details in the interest of the special architectural qualities of the proposal in accordance with Chapter 12 (Achieving Well-designed Places) and Chapter 16 (Conserving and Enhancing the Historic Environment) of the National Planning Policy Framework (2024); Policy D4 (Delivering Good Design) and Policy HC1 (Heritage Conservation and Growth) of the London Plan (2021); Policy P13 (Design of Places), Policy P14 (Design Quality) and Policy P20 (Conservation Areas) of the Southwark Plan (2022).

**Permission is subject to the following Pre-Occupation Condition(s)**

6. (a) Details of 2x bat boxes, as well as 2x bird boxes (1x 26mm entrance and 1x 32mm entrance), to be installed onsite, shall be submitted to and approved in writing by the Local Planning Authority (LPA) within 3 months of the first public use of the refurbished clubhouse building. Submitted details shall include the exact onsite location(s), specification(s) and installation method(s) of the habitats.
  
- (b) The habitat enhancements shall be installed onsite within 3 months of the approval of submitted details. The habitat enhancements shall be installed strictly in accordance with the details so approved and shall be maintained as such thereafter.

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

**Permission is subject to the following Compliance Condition(s)**

7. The materials to be used in the implementation of this permission shall not be otherwise than as described and specified in the application and on the drawings hereby approved unless the prior written consent of the Local Planning Authority has been obtained for any proposed variation or post permission approval of details.

Reason: To ensure that the new works blend in with the existing building in the interest of the design and appearance of the building in accordance with the National Planning Policy Framework (2024); Policy D4 (Delivering good design) of the London Plan (2021); Policy P13 (Design of places), Policy P14 (Design quality) and Policy P20 (Conservation areas) of the Southwark Plan (2022).

8. The existing trees on or adjoining the site which are to be retained shall be protected and both the site and trees managed in accordance with the recommendations (including facilitative pruning specifications and supervision schedule) contained in the Arboricultural Method Statement Ref: PJC/6738/24/01 REV -, DATED 2nd September 2025 and Tree Protection Plan prepared by PJC.

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 shall adhere to BS5837: (2012) Trees in relation to demolition, design and construction; BS3998: (2010) Tree work - recommendations.

All Arboricultural Supervisory elements are to be undertaken in accordance with the approved Arboricultural Method Statement site supervision key stages (BS: 5837 (2012)) for this site, as evidenced through signed sheets and photographs.

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); Policy G7 (Trees and Woodlands) of the London Plan (2021); Policy P20 (Conservation areas), Policy P60 (Biodiversity) and P61 (Trees) of the Southwark Plan (2022).

9. The construction works shall be carried out in accordance with the following avoidance and mitigation measures from the approved document 'PRELIMINARY ECOLOGICAL APPRAISAL - APPENDIX D' (doc. ref.: SE24-1181 REV V.02, dated 15.09.2025 and prepared by Simlaw Ecology):

-Where reasonably practicable, the installation of a 2m buffer zone on all soft landscaping around the hedgerow [Priority Habitat hedgerows (H1) - Figure 5] to protect it from encroachment and direct impacts. Wherever possible, this hedgerow should be protected by measures to avoid/minimise direct (i.e., encroachment, root compaction or removal) and indirect (i.e., groundwater pollution and dust) impacts during construction.

-Any trenches or excavations made during the construction works must be

backfilled nightly, boarded over or have a means of exit (such as a scaffold board left in the excavation as a walkway) to prevent west European hedgehog, or other wildlife, becoming trapped overnight including while the Application Site is not in use.

Reason: To ensure sensitive habitats bordering the site are sufficiently protected during construction in accordance with the National Planning Policy Framework (2024); Policy G6 (Biodiversity and access to nature) of the London Plan (2021); and Policy P60 (Biodiversity) of the Southwark Plan (2022).

10. The Rated sound level from any plant, together with any associated ducting shall not exceed the Background sound level ( $L_{A90\ 15min}$ ) at the nearest noise sensitive premises. Furthermore, the plant Specific sound level shall be 10dB(A) or more below the background sound level in this location. For the purposes of this condition the Background, Rating and Specific sound levels shall be calculated in full accordance with the methodology of BS4142:2014 +A1:2019.

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 National Planning Policy Framework (2024); Policy P56 (Protection of amenity) and Policy P66 (Reducing noise pollution and enhancing soundscapes) of the Southwark Plan (2022).

11. Any contamination that is found during the course of construction of the development that was not previously identified shall be reported immediately to the local planning authority. Development on the part of the site affected shall be suspended until a risk assessment has been carried out and submitted to and approved in writing by the local planning authority. Where unacceptable risks are found, the development shall not resume or continue until remediation and verification schemes have been carried out in accordance with details that shall first have been submitted to and approved in writing by the local planning authority.

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 National Planning Policy Framework (2024); Policy P56 (Protection of amenity) and Policy P64 (Contaminated land and hazardous substances) of the Southwark Plan (2022).

**APPENDIX 2****Relevant planning policy**

<b>National Planning Policy Framework 2024</b>
The policies of relevance in respect of this application are:
<ul style="list-style-type: none"> <li>• Chapter 2 Achieving sustainable development</li> <li>• Chapter 8 Promoting healthy and safe communities</li> <li>• Chapter 11 Making effective use of land</li> <li>• Chapter 12 Achieving well-designed places</li> <li>• Chapter 13 Protecting green belt land</li> <li>• Chapter 15 Conserving and enhancing the natural environment</li> <li>• Chapter 16 Conserving and enhancing the historic environment</li> </ul>
<b>The London Plan 2021</b>
The policies of relevance in respect of this application are:
<ul style="list-style-type: none"> <li>• Policy D4 Delivering good design</li> <li>• Policy D12 Fire safety</li> <li>• Policy D14 Noise</li> <li>• Policy HC1 Heritage conservation and growth</li> <li>• Policy G3 Metropolitan Open Land</li> <li>• Policy G6 Biodiversity and access to nature</li> <li>• Policy G7 Trees and woodlands</li> </ul>
<b>Southwark Plan 2022</b>
The policies of relevance in respect of this application are:
<ul style="list-style-type: none"> <li>• P13 Design of places</li> <li>• P14 Design quality</li> <li>• P18 Efficient use of land</li> <li>• P20 Conservation areas</li> <li>• P21 Conservation of the historic environment and natural heritage</li> <li>• P47 Community uses</li> <li>• P56 Protection of amenity</li> <li>• P57 Open space</li> <li>• P60 Biodiversity</li> <li>• P61 Trees</li> </ul>
<b>Supplementary Planning Documents (SPDs) and other documents of material relevance</b>
Of relevance in the consideration of this application are:

- Dulwich SPD (2013)
- Heritage SPD (2021)
- Dulwich Wood Conservation Area Appraisal (2006)

**APPENDIX 3****Planning history of the site and nearby sites**

<u>Reference</u>	<u>Description of development</u>	<u>Decision</u>	<u>Date</u>
83/AP/0041	Erection of a floodlighting system on two of the clubs existing play deck surface tennis courts at old college lawn tennis croquet club, Gallery Road, London	GRMIN	07.03.1983
83/AP/1430	Demolition of existing club house and erection of a single storey replacement house at Old College Lawn Tennis Club, Gallery Road	GRMIN	24.11.1983
85/AP/0465	The erection of a prefabricated concrete storage shed and associated timber screen fence at the Old College lawn tennis club, Gallery Road	GRMIN	27.03.1985
92/AP/0636	Installation of 9 x 6.1m high poles floodlighting tennis court	GRMIN	21.10.1992
93/AP/0270	Variation of condition 2 Flood lighting extension to 21:00 hrs	GRMIN	14.07.1993
93/AP/0719	AOD - screening retails	GRAOD	18.10.1993
21/AP/2615	Construction of tennis court, erection of perimeter fencing, installation of x3 LED floodlights, extension of x3 existing LED floodlight arms and removal of x4 trees.	GRMIN	02.02.2022
85/AP/0519	Approval of colour of storage hut	GRAOD	25.04.1985
19/AP/1573	Variation of condition 2 (approved plans) pursuant to planning permission 12/AP/1573 for: Relocation of 4 floodlighting posts around tennis courts 4 and 5 and use of floodlighting for courts 1-5 between the hours of 08:00 to 21:30 Monday to Saturday and for courts 1, 2 and 3 between the hours of 08:00 to 20:30 on Sunday.  The Variation is for an increase in height by 0.5m of floodlighting posts around tennis courts 1,2,3,4 & 5. The existing floodlights would be replaced with LED luminaires, with associated new hoods.	GRMIN	19.09.2019

17/AP/4258	Installation of LED floodlights to courts nos.6 and 7 for use Monday to Saturday 8:00 to 21:00. Extension of use of existing floodlights on courts nos. 4 and 5 on Sunday 8:00 to 20:30.	GRA	12.03.2018
12/AP/1573	Relocation of 4 floodlighting posts around tennis courts 4 and 5 and use of floodlighting for courts 1-5 between the hours of 08:00 to 21:30 Monday to Saturday and for courts 1, 2 and 3 between the hours of 08:00 to 20:30 on Sunday.	GRA	18.07.2012
11/AP/0815	Replacement of the existing pair of timber gates for vehicle access with a pair of wrought iron gates for vehicle access and a wrought iron pedestrian access gate.	GRA	07.06.2011
09/AP/1372	To provide floodlighting to Court no.3 with 3no. new lighting posts; repositioning of 3no. existing posts next to Court no2; repositioning of 2no lighting posts to Court no1; relocation of gate and new gate in wire mesh fencing.	GRA	08.09.2009
06/AP/0392	Variation of condition 2 of planning consent 03AP1473 to extend the floodlight time by one hour to 9pm on courts 4 and 5 on Monday to Saturday	GRA	11.09.2006
04/AP/0379	Details of the floodlight installation and shields as required by condition 4 of planning permission dated 13/11/2003 LBS Reg.03-AP-1473 for the erection of nine 6.1m high floodlights to serve tennis courts nos. 4 & 5.	GRAOD	24.05.2004
04/AP/0902	Details of screening as required by condition 5 of planning permission dated 13/11/2003 LBS Reg. 03/AP/1473 for the erection of nine 6.1m high floodlights to serve two tennis courts.	GRAOD	14.07.2004
03/AP/1473	The erection of nine 6.1m high floodlights to serve two tennis courts.	GRA	13.11.2003

## APPENDIX 4

### Consultation undertaken

**Site notice dates:** 16.10.2025 - 06.11.2025

**Press notice date:** 16.10.2025 - 06.11.2025

**Neighbour consultation letters sent:** 09.10.2025 - 30.10.2025

#### Internal services consulted:

- Ecology Team (ECOLOG)
- Design and Conservation Team (DES)
- Urban Forestry Team (URBA)
- Transport Policy Team (TRA)
- Highways Development Team (HDM)
- Environmental Protection Team (EPT)

#### Statutory and non-statutory organisations:

- N/A

#### Neighbour and local groups consulted:

13 College Gardens London Southwark SE21 7BE  
 5 Gallery Road London Southwark SE21 7AD  
 1 College Gardens London Southwark SE21 7BE  
 10 College Gardens London Southwark SE21 7BE  
 11 College Gardens London Southwark SE21 7BE  
 12 College Gardens London Southwark SE21 7BE  
 14 College Gardens London Southwark SE21 7BE  
 17 College Gardens London Southwark SE21 7BE  
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 7 College Gardens London Southwark SE21 7BE  
 8 College Gardens London Southwark SE21 7BE  
 9 College Gardens London Southwark SE21 7BE  
 Gate Lodge 3 Gallery Road London Southwark SE21 7A

## APPENDIX 5

### Consultation responses received

#### Consultation responses from members of the public

- No letters of objection.
- Two letters of support.

#### Consultation responses from internal and divisional consultees

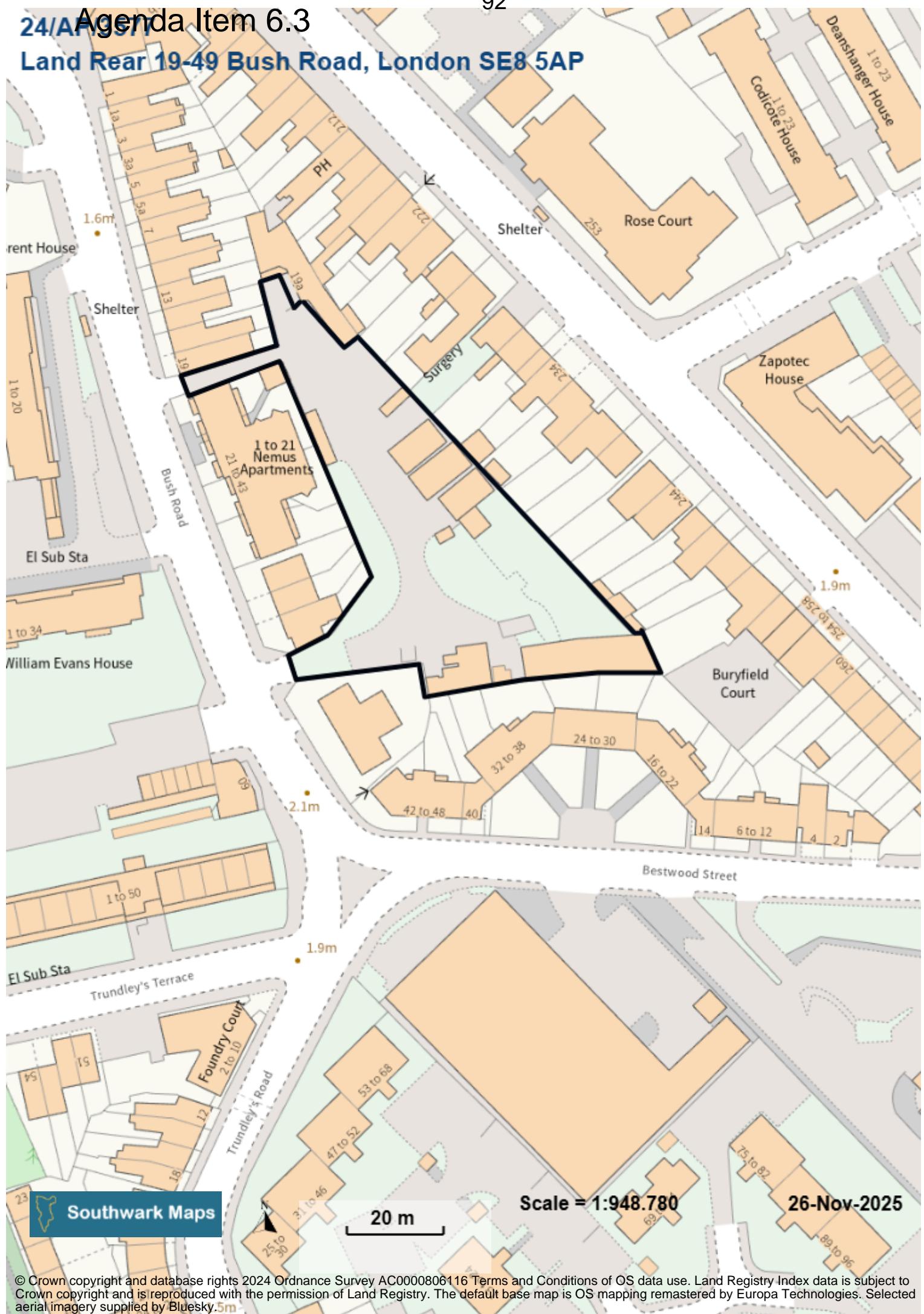
- Ecology Team (ECOLOG) - No objection, subject to conditions. Development is BNG applicable.
- Design and Conservation Team (DES) - No objection, subject to conditions.
- Urban Forestry Team (URBA) - No objection, subject to conditions.
- Transport Policy Team (TRA) - Further information requested.
- Highways Development Team (HDM) - Further information requested.
- Environmental Protection Team (EPT) - No comment received.

## 24/AP/2024/1177

### Agenda Item 6.3

### Land Rear 19-49 Bush Road, London SE8 5AP

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<b>Meeting Name:</b>	Planning Committee (Smaller Applications)
<b>Date:</b>	8 December 2025
<b>Report title:</b>	<p><b>Development Management planning application:</b>            Application 24/AP/3577            for: Full Planning Application</p> <p><b>Address:</b>            Land Rear 19-49 Bush Road, London SE8 5AP</p> <p><b>Proposal:</b>            Demolition of all existing buildings and construction of 3no. blocks with heights of two, three, and part-four storeys, containing commercial space (Use Class E(g)(i) / E(g)(iii)), purpose-built student accommodation rooms (Use Class Sui Generis), associated landscaping, service bay and turning areas.</p>
<b>Ward(s) or groups affected:</b>	Bermondsey And Rotherhithe
<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> 13.01.2025	<b>Application Expiry Date:</b> 01 October 2025
<b>Earliest Decision Date:</b> 03 April 2025	

## RECOMMENDATIONS

1. That planning permission be granted subject to conditions and the applicant entering into an appropriate legal agreement.
2. If the requirements of paragraph 1 above are not met by 8 June 2026, the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 270.

## EXECUTIVE SUMMARY

3. The proposed development seeks full planning permission for the demolition of existing buildings and the construction of three blocks (two, three, and part-four storeys) comprising 106 purpose-built student accommodation (PBSA) rooms

and 320 sqm of flexible commercial space (Use Class E(g)(i)/(iii)), with associated landscaping, parking, and turning areas. The site is a brownfield backland plot located in a highly accessible area (PTAL 5) within Flood Zone 3a. Paragraph 125 of the National Planning Policy Framework (NPPF, 2024) gives substantial weight to the reuse of suitable brownfield land within settlements. The proposal aligns with this guidance and contributes to housing supply, with 106 student bedspaces equating to 42.4 C3 dwellings under the London Plan conversion ratio.

4. The proposed development provides good quality purpose-built student housing which is in high demand. The development will benefit the local economy through student population expenditure. Other social benefits include an affordable housing contribution of £ 3,710,000 and the provision of accessible routes and student rooms. Wider sustainability benefits include the re-use of suitable brownfield land as part of a local regeneration scheme, a payment in-lieu of affordable housing on site, the provision of good quality student housing, an overall reduction in flood risk to the wider community and the provision of multifunctional Sustainable Drainage Systems that integrate with green infrastructure. Urban greening, biodiversity gain and reduced industrial noise and /pollution are also welcomed. It is therefore recommended that planning permission be granted, subject to conditions and the timely completion of a S106 Agreement.
5. The development supports strategic regeneration objectives for Southwark, particularly in areas of deprivation within Flood Zones 2 and 3. It delivers wider sustainability benefits including:
  - Reuse of brownfield land
  - Provision of high-quality student housing
  - The creation of 5 jobs for the student accommodation element
  - Affordable housing contribution (£3.71 million in lieu)
  - Commercial space would generate 28 jobs
  - Significant Biodiversity Net Gain (145%) and Urban Greening Factor (0.4)
  - 79% on-site carbon reduction and BREEAM “Excellent” target
  - Multifunctional Sustainable Drainage Systems (SuDS) reducing runoff from 50.5 l/s to 2.5 l/s.
6. Flood risk has been assessed. The site benefits from raised flood defences and the Thames Barrier. Finished Floor Levels are set 300mm above the Maximum Likely Water Level for the 2100 breach scenario. The development is considered flood resistant and resilient, with safe access and egress, and a flood warning plan to be implemented.
7. The proposal has evolved through pre-application engagement and addresses previous concerns regarding massing, amenity, and design. It is considered acceptable in terms of townscape, architectural quality, and impact on neighbouring properties.

## BACKGROUND INFORMATION

### Site location and description

8. The site is triangular in form and is approximately 0.32 acre and is located between Lower Road and Bush Road and is a backland site. Planning officers note the applicant would characterise it differently given that it is an existing industrial site and is not a typical backland plot. The site is partially occupied by a vacant brick built single storey building, which was used as offices associated with a plant hire yard. There are several vacant smaller buildings which were used for equipment and material storage. The buildings on site are not in good condition. The site has 2 no. existing vehicle accesses on Bush Road. There are no existing trees on-site, but a screen grab from the 2023 ProximiTree layer identify loss of canopy cover. The site is in a highly accessible location with a PTAL rating of 5 and lies within Flood Zone 3a. The site is within a Controlled Parking Zone (CPZ). There is a bus stop (N) on Bush Road, across from the site. There is a street lighting column within the public highway to the frontage of the property. Bush Road is a one-way street.

9. The site was previously used as a plant and machinery hire business, comprising primarily open storage with a range of buildings to support the use. The previous plant hire and machinery business (John Macnamara & Co) vacated the site in April 2024. This business moved to another nearby site within the borough. The previous business had an average of 3 employees as confirmed in their company accounts. As the site is currently vacant, there is no existing employment as at the time of this planning application.

Image: Existing site layout plan



Image – Existing buildings



10. The site is not in a conservation area and does not include any statutory or locally listed buildings. However, some locally listed buildings are located near the Site:

- 226-244 Lower Road
- 214 Lower Road (Farrier's Arms PH)
- 198 Lower Road
- Sutton Dwellings on Chilton Grove.

Image: locally listed buildings



11. The application follows a refusal at the site for the demolition of all existing buildings and construction of self-contained residential flats (LPA ref: 19/AP/2544). The subsequent appeal was dismissed.

### **The surrounding area**

12. Bush Road is a classified road, A200. There is a bus stop (N) on Bush Road, across from the site. There is a street lighting column within the public highway to the frontage of the property. Bush Road is a one-way street.

### **Details of proposal**

13. Demolition of all existing buildings and construction of 3no. blocks with heights of two, three, and part-four storeys, containing 320 sqm flexible commercial space (Use Class E(g)(i)/E(g)(iii)) and 106 purpose-built student accommodation rooms (Use Class Sui Generis). Use Class E(g)(i) comprises an office to carry out any operational or administrative functions and Use Class E(g)(iii) comprises any industrial process, provided it can be carried out in a residential area without detriment to the amenity of that area. Associated

landscaping, cycle parking, service bay and turning areas are also proposed. Some of the roofscape would be utilised for bio-diverse roofs.

14. The proposed 320 sqm flexible commercial space (Use Class E) would be split across 4no. units. It is estimated that the commercial space would generate 28 jobs.
15. The student accommodation element will result in the creation of 5 additional jobs. The proposal will potentially generate 33 new jobs.

Image – Proposed ground floor layout



### Image - Floorspace schedule

Block C (Commercial)			Block B (PBSA)			Block A (PBSA)		
	GIA sqm	GIA SQft		GIA sqm	GIA SQft		GIA sqm	GIA SQft
Ground	172	1851	Ground	234	2519	Ground	918	9881
01	148	1593	01	216	2325	01	908	9774
			02	165	1776	02	690	7427
<b>Total</b>	<b>320</b>	<b>3444</b>	<b>Total</b>	<b>615.0</b>	<b>6620</b>	<b>Total</b>	<b>2868</b>	<b>30871</b>

16. The total floorspace (GIA) would be 3,801 m<sup>2</sup> with the purpose-built student accommodation being 3,484 m<sup>2</sup> and the commercial: 317 m<sup>2</sup>. The proposed internal amenity space would be 189 m<sup>2</sup> (1.78 m<sup>2</sup> per student) and the external amenity space would be 448 m<sup>2</sup> (4.23 m<sup>2</sup> per student)
17. The height of the proposed buildings would be a maximum of 4 storeys (Block A), stepping down to 2 storeys (Block C). Maximum height of the proposed development: Block A: 13.25m – 4 storeys - (14.05m inc. lift overrun), Block B: 10.35m – 3 storeys - (11.15m inc. lift overrun), and Block C: 7.4m – 2 storeys - (8.2m inc. lift overrun).

### Image – proposed height (east elevation – view from rear of Lower Road)



18. planting of 16 trees are proposed. In terms of transport the development would be car-free except for 2 blue-badge car parking spaces and 120 cycle spaces are proposed. The Urban Greening Factor would be 0.4 and a Biodiversity Net Gain of 145% is proposed. In terms of energy, the proposal would have a 79% on-site carbon reduction and a BREEAM “Excellent” target would be achieved.

### Amendments to the application

19. Since submission, additional documents have been submitted and the scheme amended in the following ways:

### **Documents:**

BNG Report  
 Technical Response / BNG Review  
 Engagement Summary  
 Comments response

February 2025: Design and Access Statement amended to include all studio types

August 2025

- Design and Access Statement
- Revised set of planning drawings
- Illustrative Landscape Masterplan
- Ground Floor and Roof Hard / Soft landscape GAs
- UGF Plan
- UGF Report
- Transport Technical Note (includes updated trip generation assessment)

October 2025

- Revised Refuse Collection Strategy drawing
- Revised Short Stay Cycle drawing
- Revised Design and Access Statement reflecting the above

November 2025

- Comparative separation distances drawing
- Daylight and Sunlight: addendum

### Evolution of the proposed development

20. Objectors raised concerns that '*the overall gross external area (GEA) of the proposed development is larger than the first pre-app scheme by 460sqm. The second pre-app scheme footprint isn't included in the data but the Council's response to this scheme regarding footprint suggests that this too was larger than the first pre-app scheme, although it's difficult to understand whether the application scheme has been reduced in size because the second pre-app scheme is not included in the comparative study.*' Objectors '*requested that this pre-app information is made publicly available so that an accurate assessment can be made.*'
21. The pre-application response 24/EQ/0211 was added to the public register on 1 May 2025.
22. The image below shows the gross external area (GEA) of the:
  - first pre-app scheme – 3,735 sqm
  - second pre-app scheme – 4,068 sqm
  - proposed development – 4,195 sqm
23. The image below shows the gross external area (GEA) of the proposed development of 4,195 sqm is not significantly more than the residential scheme of 3,549 sqm.

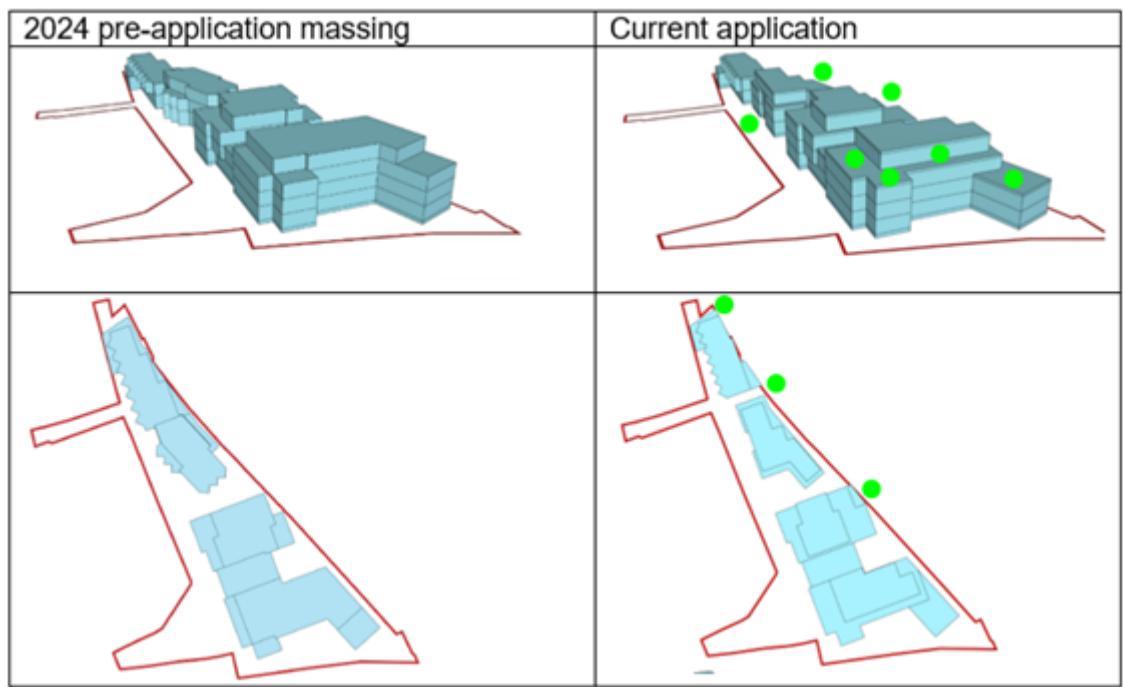
### Image: design evolution



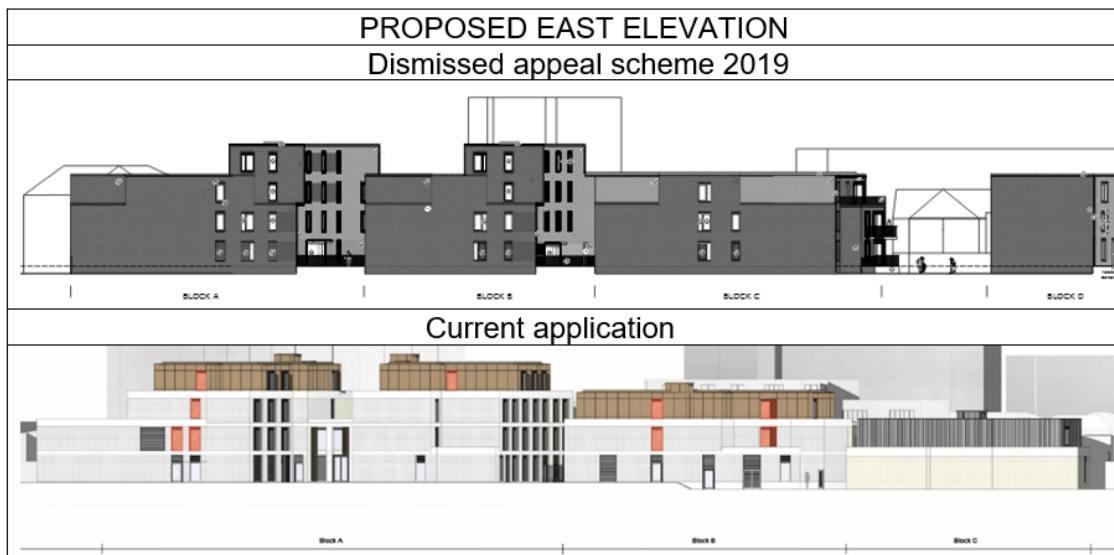
24. The following amendments were made to the proposal following officer feedback on the 2024 pre-application:

- Reduction to massing at upper levels to minimise visual impact and appearance from neighbouring views.

### Image: 2024 pre-application scheme compared to current application



### Image – east elevation evolution – view from rear of Lower Road



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

### Support

25. 18 comments of support have been received and the matters supported include:

- Land use - student accommodation, fund more social housing
- Makes sustainable use of land
- Security Bringing a vacant site back in to use will also help improve security in the local area
- Amenity – no overlooking
- Adequate distance from other properties
- Traffic
- Does not increase traffic
- Design
- High quality design
- Economic benefits
- Contributes to regeneration
- Creates economic vitality
- New skills/employment opportunities
- Creates inward investment
- General support for the proposals

### Objection

26. 70 comments of objection have been received, raising the following issues:

- Land use
- Student housing would not benefit the community and Southwark more generally
- No affordable homes - The development prioritises student accommodation

over much-needed general and affordable housing, making it an unsustainable land use strategy.

- No affordable student accommodation
- Unnecessary Student Accommodation Given Existing Approvals Southwark Council has already approved significant student accommodation. recent trends indicate a decline in university enrolments in London, suggesting reduced demand for additional student housing.
- Student accommodation in a family area is going to disrupt the natural character of the neighbourhood
- Employment
- The jobs created through the proposed commercial development are likely to be of low quality and are offset against those jobs lost from the plant yard
- Design
- Inappropriate massing, scale and height
- Backland development must not be more intensive than the existing development on the adjoining street frontage
- Detrimental impact on local street scene and views
- Out of keeping with character of area
- Fail to respect the established architectural context
- More open space needed on development
- Overdevelopment
- The proposed plans for the eastern elevation of Block A contain air source heating pumps which appear intended to be located on a first-floor wall and thus will be directly visible from the adjoining neighbouring properties
- No detail of materials
- Impact on heritage assets
- The site is surrounded by heritage property from the Georgian and Victorian eras. The proposed development is entirely out of character and has an adverse impact on the setting of this property
- Quality of accommodation
- Poor living conditions for future occupiers
- The development is too big and compact for the surrounding neighbours and will impact their own living standards
- Ecology and biodiversity
- Detrimental effect on local ecology and biodiversity
- Transport and Highways
- Local transport and highways impacts
- Increase in traffic impacting traffic volumes
- Vehicles entering and exiting will create additional delays and hazards
- Insufficient Emergency Access (Contrary to the London Plan Policy D12 and Building Safety Regulations) particularly for fire engines. London Plan Policy D12 (Fire Safety) requires all major developments to demonstrate that they have been designed with suitable fire safety measures. Given the limited access points and the dense layout of the scheme, the application fails to meet these crucial safety requirements
- Inadequate parking provision
- Inadequate public transport provisions
- Environment
- Impact on air quality and increase in pollution
- Flood risk

- Increased flood risk
- Increase danger of flooding
- Residents of Lower Road have experienced significant flooding, subsidence and sewer overflowing problems
- Policy P55 (Sustainable Drainage Systems and Water Management) requires new developments to mitigate flood risk, yet the area already suffers from frequent sewer blockages. The application does not provide an adequate plan to address drainage capacity issues, which will be worsened by the increase in population density
- Daylight, sunlight and overshadowing
- Loss of daylight and sunlight to neighbouring properties
- Fails to recognise the light impact on the separate basement dwellings
- The conclusions to the daylight and sunlight report pay scant regard to the personalities of each of the properties nor the number of dwellings therein. This disregard leads to inaccurate conclusions to the assessment of the impact of the proposed scheme on the neighbouring residential properties' enjoyment of daylight and sunlight
- Since the introduction of Lockdown and the change in lifestyle of 'Working from Home' was implemented, the status of our living/working home environments are detrimental to our livelihoods and wellbeing. The dependency on natural daylight alone in the home to thrive on a personal and professional basis has proved to be vital. We already suffer with the proximities we have with daylight/sunlight as a household. This development will deprive us further with such an obtruding building.
- Overshadowing of gardens of neighbouring properties
- Right to light
- Feeling of enclosure
- The proposed development builds up and to the extremities of the site, placing four storey buildings directly within the backland to residential properties of two stories height. In particular, the proposed plans appear to place the northeast edge of Block A directly on to the boundary to neighbouring properties and rapidly escalate in height
- Loss of outlook
- Loss of privacy
- Light pollution - the proposed nighttime street, site and security lighting will significantly increase the amount of light shining into the neighbouring properties at night, further reducing the quality of life enjoyed by the neighbours
- Noise and disturbance
- The site has been used as a plant yard since the 1980's and as such quiet enjoyment of the neighbours' space has been achieved outside of their regular operating hours. The proposed plans will result in a significant increase in noise over extended time periods during the day and night given the density of population intended within the proposed plans
- Noise from students and the proposed commercial units
- High level of noise from heat pumps (right the boundary wall) and air conditioning units
- Construction
- Construction impacts in terms of dust, disruption, and noise. The construction process will give rise to years of works with traffic, noise, dust, pests, insecurity and other disruptions. The dust and noise will continually

- affect our physical and mental health for years
- Security
- Affect the security of neighbouring properties. This needs to be a secure gated accommodation, only accessible by the students and requiring scannable identification cards to enter
- Potentially contaminated land
- Inequality. Equalities impact – Age; Equalities impact- Disability stacking people on top of each other can negatively impact mental health
- Consultation
- Lack of prior consultation
- Lack of consultation. There has been no pre application consultation with ward councillors nor with the local community which goes against the principles of the council's development charter. This application should not have been submitted prior to any consultation being carried out. Other than one leaflet posted through the door in autumn/winter 2024, the developers have not engaged in any way with the local community
- Community Infrastructure Levy funding
- Other
- General dislike of proposal
- Devaluation of neighbouring properties
- Information missing from plans
- Strain on existing community facilities - GP appointments are already scarce. There is already a strain on public resources - GP appointments are already scarce and transportation in the area with the surrounding stations being at maximum capacity, with no plans on how these issues, already impacting residents, would be addressed, I don't see any benefit to this change in plans to add more housing and am opposed to this plan
- The building will be a strain on the already limited community facilities (especially transports, whether by bus or Tube/Overground. Bush Road is constantly affected by heavy traffic, and this proposal will make the situation worse
- Structural impact - The proposed proximity of the buildings to the boundary wall raise questions on how the building will be safely underpinned, constructed and maintained.
- The proposed plans do not bear any indication as to the size and fabrication of the boundary walls to the Lower Road property gardens

## **Planning history of the site**

27. 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 3.

## **KEY ISSUES FOR CONSIDERATION**

### **Summary of main issues**

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

- Principle of the proposed development in terms of land use;
- Affordable workspace
- Environmental impact assessment
- Affordable housing and development viability
- Amenity space
- Design, including layout, building heights, landscaping and ecology;
- Heritage considerations
- Archaeology
- Impact of proposed development on amenity of adjoining occupiers and surrounding area, including privacy, daylight and sunlight
- Transport and highways, including servicing, car parking and cycle parking
- Environmental matters, including construction management, flooding and air quality
- Energy and sustainability, including carbon emission reduction
- Ecology and biodiversity
- 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

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

## **Legal context**

30. 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.

31. 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**

32. The statutory development plans for the Borough comprise the London Plan 2021 and the Southwark Plan 2022. The National Planning Policy Framework (2023) 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.

33. The site is located within the:

Flood Zone 3

PTAL 5

Bush Road is a classified road, A200

Controlled Parking Zone, South Rotherhithe (N) operating between the hours of 08:00 - 18:30, Monday - Friday.

## **ASSESSMENT**

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

34. Officers raised no issue in the response to pre-application enquiry 24/EQ/0211 to the principle of a mixed-use development comprising commercial (Use Class E (i) and (iii)) and student accommodation (sui generis use). The creation of additional employment of 5 jobs for the student accommodation element and 28 jobs for the commercial use is welcomed.

#### Commercial uses

35. Objectors raised concern that the jobs created through the proposed commercial development are likely to be of low quality and are offset against those jobs lost from the plant yard.

36. The proposal to demolish the existing buildings on site, which were last in use by a Plant and Machinery Hire Business (sui generis use) and before that also as a sui generis use - a tyre shop, would be acceptable subject to meeting Policy P33 (Business relocation) of the Southwark Plan 2022. This policy states that where existing small or independent businesses or small shops may be displaced by development if a satisfactory business relocation strategy, written in consultation with affected businesses, is provided. The business strategy must set out viable relocation options, the existing amount of non-residential floorspace on site, and details of engagement with the local authority and the business owner.

37. The Business Relocation Strategy includes a letter from Glenny LLP setting out the timeline of the relocation strategy from October 2015 to the tenant vacating the Site in July 2022, in line with the requirement of Policy P33 of the Southwark Plan to detail engagement with business owners. It also provides details of compensation and mitigation measures as part of the strategy. The relocation strategy would meet policy requirements.

38. The site lies just outside the Rotherhithe Action Area Core, Action Area and Opportunity Area. Policy AV.15 Rotherhithe Area Vision of the Southwark Plan states that development in Rotherhithe should provide a range of flexible employment spaces, including premises suitable for smaller businesses. The introduction of flexible office – use class E(g)(i) / industrial processes - use class E(g)(iii) would therefore be acceptable in this location.

#### Affordable workspace

39. The Business Relocation Strategy set out the timeline of the relocation

strategy from October 2015 to the tenant vacating the Site in July 2022, in line with the requirement of Policy P33 of the Southwark Plan. In this case, there is no requirement to provide affordable workspace.

### Student accommodation

40. Objectors raised concern that student housing:

- Would not benefit the community and Southwark more generally
- In a family area is going to disrupt the natural character of the neighbourhood
- Would not be affordable student accommodation
- Would be unnecessary given existing approvals by Southwark Council for a significant number of student accommodation. Recent trends indicate a decline in university enrolments in London, suggesting reduced demand for additional student housing.

#### *Community benefit and residential neighbourhood character*

41. Policy H15 (Purpose-built student accommodation) of the London Plan 2021 states that student accommodation should be developed in locations well-connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment scheme. The applicant must demonstrate that the site is an appropriate location for student housing and would create a mixed and inclusive neighbourhood.

42. Objectors raised concerns that the development would not introduce any opportunities for the wider community or the neighbouring properties.

43. The Student Accommodation Demand Assessment states that the site is well-positioned to contribute to a mixed and inclusive neighbourhood, based on factors such as diversity of student population, integration with the local community, community-oriented design and economic and social contribution by future occupiers.

44. Planning officers consider that as it is likely that a proportion of future occupiers would be international students they would contribute to cultural diversity in the area. The proposed scheme is designed for postgraduate students, who tend to be older, more diverse, and often international. It is also likely that the development would reduce pressure on local HMOs, thereby freeing up residential housing for local families and helping balance housing needs across demographics. Planning officers also consider the proximity to local services, shops, and transport would encourage students to engage with the neighbourhood. The site is in an area with lower density of student housing and would alleviate over-concentration elsewhere and would promote a balanced urban development. Generally, students would contribute to the local economy through spending and part-time work, and it is considered that the presence of students would support local businesses, cultural venues, and public services.

*Affordable student accommodation*

45. Objectors raised concerns that the applicant's planning statement and viability assessment suggests that there will be no affordable housing payment in lieu of on-site provision. Objectors state that as the scheme proposes 100% direct-let accommodation with no Nominations Agreement Policy P5 of the Southwark Plan requires a minimum 27% of student rooms to be affordable with the provision of at least 35% affordable housing (in Use Class C3 as opposed to Sui Generis student housing) if a Nominations Agreement isn't entered into.
46. The affordable housing and development viability section of this report sets out how such payments are to be calculated. The Financial Viability Assessment demonstrate the maximum viable contribution based upon the above calculation is £ 3,200,550. The applicant has however agreed with officers to increase the payment in lieu of affordable housing to £3,710,000. This would be secured through a S106 legal agreement. The increased contribution is noted to be higher than the agreed maximum viable provision as demonstrated by the Financial Viability Assessment, which has been reviewed by Strettons on behalf of the London Borough of Southwark. The applicant acknowledges that the figure exceeds the maximum viable provision but considers that the development may still be deliverable if market conditions improve.
47. The increased figure represents 35% provision using the formula as set out in the 2011 Draft Affordable Housing SPD (106 habitable rooms x 0.35 x £100,000), which was the relevant policy document at the time of submission of the application. Recent appeal decision ref. APP/A5840/W/25/3363575 at 257-283 Ilfordon Road, Southwark confirmed this was an acceptable approach, given that it represented the maximum viable provision. This approach is in accordance with Policy P5 (Student homes) of the Southwark Plan 2022, which states that when providing direct lets at market rent, development must provide the maximum amount, with a minimum of 35% as conventional affordable housing by habitable room subject to viability, as per Policy P4, as a priority.
48. The applicant has confirmed that it would not be viable to provide a payment of lieu of £4,823,000, which would represent 35% as per the Southwark Affordable Housing SPD (July 2025) (106 habitable rooms x 0.35 x £130,000). Officers agree that the proposed development cannot sustain a viability contribution at this level and that it would make the scheme undeliverable. As such, it is not considered to be justified to request an increased contribution in this instance, in accordance with Policy P5 of the Southwark Plan 2022.

*Demand for additional student housing*

49. The applicant submitted a Student Housing Needs Assessment and based upon this document planning officers consider that the proposed development would meet an identified and forecasted local and strategic need. The Student Accommodation Demand Assessment demonstrates the identified need for student accommodation within the local Surrey Quays area and notes a lower concentration of student housing in the east of Southwark, which the proposed

development seeks to assist in addressing. The applicant states that 'at present, 2,550 conventional residential dwellings are occupied by students within Southwark, indicating an acute shortfall in purpose-built student housing provision.' The Student Housing Needs Assessment further states that 'if current demographic trends continue, only 45% of identified student housing need will be met by 2030.'

50. Objectors raised concerns that Southwark '*already provides one of the highest concentrations of student accommodation within London and that the proposal would be contrary to Policy P6 of the Southwark Plan, which highlights but that student accommodation provision across the whole of London needs to be balanced with making sure there are enough sites for other types of affordable and family homes*'. It goes on to say that its Strategic Housing Market Assessment emphasises an "*acute need for more family and affordable homes*" and that "*allowing too much purpose-built shared living accommodation will restrict our ability to deliver more family and affordable housing*". Objectors are of the opinion that '*given the abundant provision of student housing in the Borough through existing and extant schemes, it is clear that this is not an appropriate use of the site, particularly as no affordable or family housing is proposed and the perceived benefits do not outweigh the harm caused to neighbour amenity*'.
51. The Student Accommodation Demand Assessment document states that the location is highly appropriate for student housing due to its accessibility, proximity to Universities, under supply of student accommodation in this part of Southwark, lack of nearby competing developments, growing demand and quality of proposed accommodation.
52. Planning officers agree that the site is accessible due to its PTAL Rating of 5, which indicates excellent access to public transport. The site is close to Surrey Quays, Canada Water, and South Bermondsey stations, which offer fast connections across London. The Student Accommodation Demand Assessment document states that:
  - London has 447,000 full-time students, but only around 102,000 PBSA beds, leaving 345,000 students reliant on private rentals or HMOS
  - Southwark has 7,753 operational PBSA beds and a pipeline of 4,677 beds, totalling approximately 12,000 beds
  - The site is within 45 Minutes of more than 60 Higher Education Institutions with approximately 360,000 students are within commuting distance from the site
  - Average student-to-bed ratio in Southwark is 9:1, indicating a severe undersupply.
53. Planning officers acknowledge the site is in proximity to Universities such as Goldsmiths College (15-minute cycle), King's College London, London South Bank University and University of the Arts London.
54. The Student Accommodation Demand Assessment document further states

that Bush Road is underrepresented in terms of student housing compared to areas like Southbank and no competing pipeline schemes are in the immediate vicinity.

55. Based on the above planning officers consider the site an appropriate location for student housing.

*Student accommodation tenure: nomination agreement /direct-let*

56. Policy H15 (Purpose-built student accommodation) of the London Plan 2021 also requires that purpose-built student accommodation is secured for students and that most bedrooms in the development are secured through a nomination agreement for occupation by students of one or more higher education provider. The applicant has stated that the student accommodation would be direct-let and not part of a nomination's agreement. The Student Accommodation Demand Assessment provides extensive analysis of demand, supply, and growth scenarios for PBSA in London and Southwark and emphasizes the growing role of direct-let PBSA in London, noting that direct-let beds have grown 20 times since 2007/08 compared to modest growth in university-owned beds.

## **Wheelchair student rooms**

57. Accessibility drawings have been provided demonstrating that the site can be accessed step-free at an appropriate gradient.
58. Policy P5 (Student homes) of the Southwark Plan 2022 states that 5% of student rooms must be provided as easily adaptable for occupation by wheelchair users.
59. The 106no. bedspaces proposed would be provided as individual studio rooms, including 11no. accessible / adaptable studios. Accessible studios would be 29 sqm. The would be split as 5% fully accessible rooms, 5% adaptable rooms and 1% adaptable for a caregiver. This would be equivalent to 10.4% provision of accessible / adaptable beds, well more than the 5% required by Policy P5 of Southwark's 2022 Local Plan, and in line with the 10% accessible / adaptable provision required by the GLA's PBSA LPG document.

## **Environmental impact assessment**

60. 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.

## **Quality accommodation and amenity space**

*Quality of student accommodation*

61. Policy H15 (Purpose-built student accommodation) of the London Plan 2021 requires accommodation to provide adequate functional living spaces and layouts.

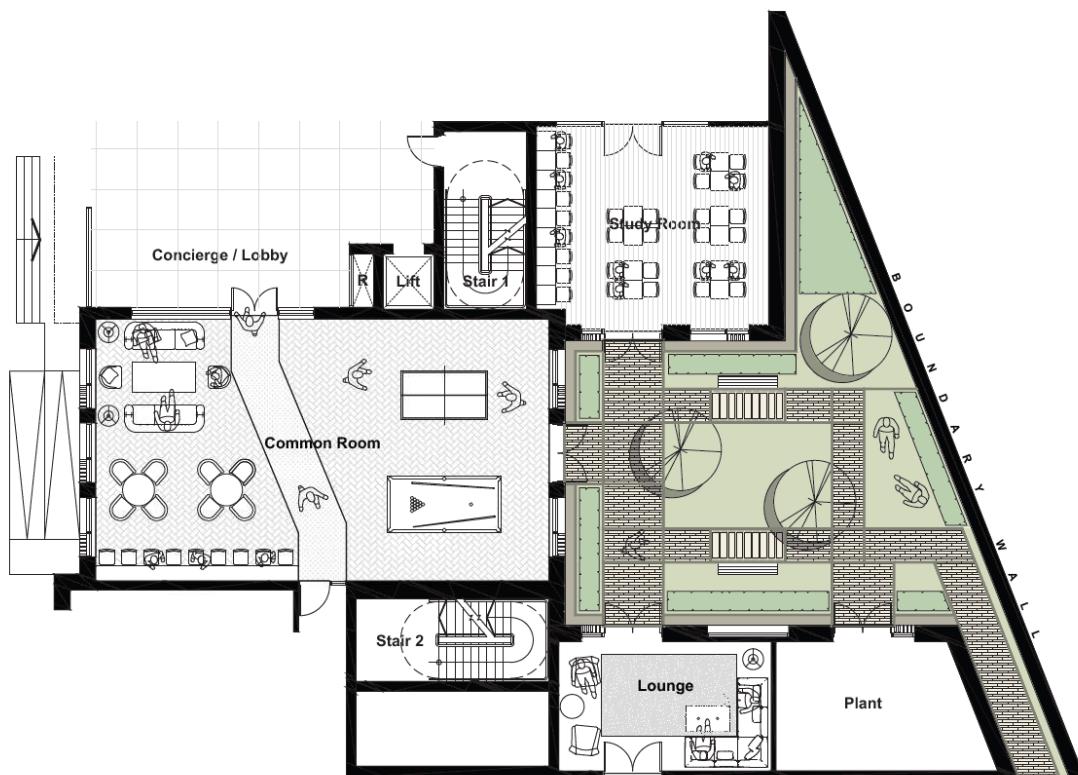
62. Significant concern was raised by planning officers under pre-application 24/EQ/0002 regarding the proposed layouts in terms of quality of living accommodation and amenity provision for students. Objectors also raised concern with regard poor living conditions for future occupiers.

*Internal student amenity space*

63. The submitted plans show functional living space and layouts and show welcome improvements have been made in terms of internal communal amenity provision, which would be located adjacent to reception. Internally and externally combined, the amenity provision would deliver a total of 536sq.m, or 5 sqm per bed space. The proposed ceiling height circa 3m at ground floor level would be acceptable as there is no policy / guidance to support our Design Team's request for a 3.5m ceiling height at ground floor level.

64. A variety of communal rooms are proposed for a variety of different uses - e.g. a snug / living room, a games room and a study room. This approach is welcome and responds directly to concerns raised by planning and design officers during the previous pre-application process 24/EQ/0002 regarding the quality of living accommodation being offered on site. The success of shared living accommodation hinges on the opportunity for residents to form community - the quality, generosity and layout and provision of communal space is therefore key to creating a good place to live. This is especially true for shared living where the studio rooms are small, as is the case here. A total of 189sqm internal amenity space would be provided in block A for the student accommodation. This is equivalent to provision of 1.78sqm per student. Planning officers note the appellant has provided evidence demonstrating that the studio sizes are larger than precedent schemes in Southwark and across London. As there are no standards for student amenity planning officers consider the proposed development would provide adequate internal student amenity spaces.

Image: Internal communal student amenity - located adjacent to reception



### *Student rooms*

65. Objectors also referred to significant concerns raised over the '*size of the rooms proposed as part of the second pre-application response, as many of them appeared to be 17sqm in size.... The drawings didn't show how the rooms would accommodate functional living space and layouts as no beds or desks etc were shown, and this element hasn't been addressed as part of the application scheme – the drawings still show rooms at 17sqm with no indicative furniture.*'
66. The council's second pre-application response referred in error to 18 sqm as being the minimum requirement for student rooms. There is no policy or guidance setting a minimum size standard.
67. The submitted plans demonstrates that each studio can comfortably provide sufficient space and separation for cooking, eating, studying and sleeping. 9 types of studios would be provided, including an accessible unit. The proposed studios would range from 17sqm to 24 sqm and the accessible studios would be 29sqm. The submitted plans show functional living space and layouts and demonstrates that each studio can comfortably provide sufficient space and separation for cooking, eating, studying and sleeping. Planning officers consider that the proposed student rooms would provide good quality accommodation.

Image - student accommodation layout of 17 sqm unit



*Student accommodation – external / outdoor amenity space*

68. Objectors referred to concern raised over the '*quality of the first pre-app scheme's outdoor communal space at the north-east given it was surrounded on three sides by the built form of one of the blocks. A slight reconfiguration of this block has been made as part of the application scheme, but the communal space remains enclosed by three walls and the rear gardens of houses along Bush Road, demonstrating a substandard area for the scheme's occupants.*'
69. 448sqm of external amenity space for students would be provided, primarily in segregated areas around the southernmost block, equivalent to 4.23sqm per bed space / student. In the context of there being no policy or guidance setting a minimum size standard for outdoor student amenity space, planning officers consider the Landscape and Amenity Space Study would represent an acceptable standard of amenity space provision and the proposed amenity for future occupiers would be acceptable.

Image: outdoor amenity space



*Noise within student rooms*

70. The Environmental Protection Team recommend permission subject to compliance conditions to cover residential internal noise levels and sound transmission between potentially loud non-residential and residential uses.

*Commercial building - quality of accommodation*

71. Planning officers consider that the proposed commercial building would provide good quality of accommodation.

**Affordable housing and development viability**

*Affordable housing and viability*

72. Objectors raised concern that no affordable homes are proposed and that the development prioritises student accommodation over much-needed general and affordable housing, making it an unsustainable land use strategy.

73. As the surrounding area is predominantly residential in land use and student accommodation is considered a form of housing, the proposed development

would contribute to housing need in the borough. Notwithstanding this, it must be demonstrated why conventional affordable housing cannot be delivered on site.

74. Policy P5 (Student homes) of the Southwark Plan 2022 states that when providing direct lets at market rent, development must provide the maximum amount, with a minimum of 35% as conventional affordable housing by habitable room subject to viability, as per Policy P4, as a priority. In addition to this, 27% of student rooms must be let at a rent that is affordable to students as defined by the Mayor of London.
75. If the student accommodation is part of a nomination's agreement the maximum amount of affordable student rooms with a minimum of 35% subject to viability must be provided; the affordable student rent should be as defined by the Mayor of London.
76. At the time of submission of the application the 2011 Draft Affordable Housing SPD set out how such payments were to be calculated. This document stated that a figure of £100,000 per habitable room should be used as the basis for these calculations. It stated that a figure of £100,000 per habitable room should be used as the basis for these calculations and that a minimum contribution equivalent to 35% provision was expected. This resulted in a payment in lieu of £3,710,000 (106 habitable rooms x 0.35 x £100,000). The benchmark cost per habitable room for payments in lieu of affordable housing has been updated in the Southwark Affordable Housing SPD (July 2025) and this resulted in a payment in lieu of £4,823,000 (106 habitable rooms x 0.35 x £130,000).
77. The Financial Viability Assessment however demonstrate the maximum viable contribution based upon the above calculation is £3,200,550. The applicant has however agreed with officers to increase the payment in lieu of affordable housing to £3,710,000. This would be secured through a S106 legal agreement. The increased contribution is noted to be higher than the agreed maximum viable provision as demonstrated by the Financial Viability Assessment, which has been reviewed by Strettons on behalf of the London Borough of Southwark. The applicant acknowledges that the figure exceeds the maximum viable provision but considers that the development may still be deliverable if market conditions improve.

## **Design**

### Site context

78. The site's boundaries are defined by fine urban grain due to unified and smaller building plots and smaller-scale 2 to 4-storey buildings.

### Overdevelopment

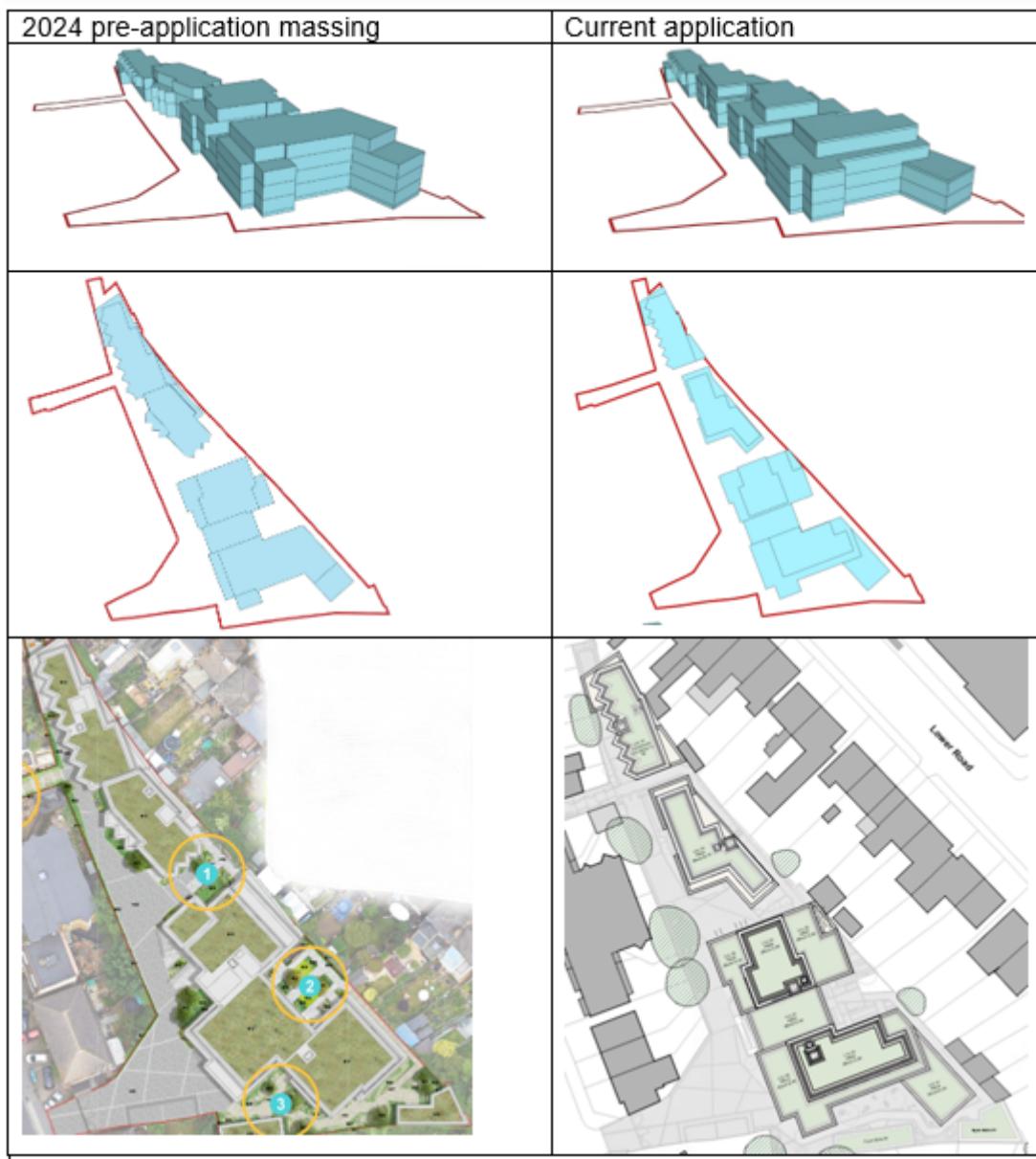
79. Objectors cited the pre-application consultation by the applicant in August 2024 and raised concern that there was not enough space for the development and that the site is too small for the proposed number of new residents / students. Objectors also raised concerns that the site would be

over-developed and more open space needed on development. Objectors raised concern that backland development must not be more intensive than the existing development on the adjoining street frontage.

80. The Residential Design Standard SPD specifies that 'backland development, particularly for new residential units, can significantly impact amenity, neighbouring properties and the character of an area'. It mentions that 'development must not be more intensive than the existing development on the adjoining street frontage'. In addition, backland developments should echo the characteristics of the existing neighbours.
81. The following amendments were made to the proposal following officer feedback on the 2024 pre-application:

Reduction to massing at upper levels to minimise visual impact and appearance from neighbouring views.

Image – 2024 pre-application comparison to current application



82. Planning officers note that our design team initially stated that '*the proposed development is too intense and does not maintain a rational street hierarchy. The proposed massing is bulky, and the building footprints do not respond well to the existing urban grain.*' Planning officers have taken this into account and conclude that the proposed footprint would be similar to the dismissed appeal residential application 19/AP/2544 and the proposed development would provide high-quality accommodation meeting space standards, inclusive design for disabled students and adequate communal and amenity spaces in accordance with Policy P13 – Student Housing. Our Design Team also reviewed further information submitted and advise that the design quality of the proposed development would complement the character of the area and enhance the streetscape. This is assessed in detail on the heritage section of this report.

## Demolition

83. The proposal would not result in the demolition of any locally or statutorily listed buildings, nor would it involve demolition in a conservation area. There are therefore no objections to the proposal in principle design and conservation terms.

## Height, scale and massing

84. Objectors raised concern to the inappropriate massing, scale and height.

85. Policy P13 (Design of Places) of the Southwark Plan 2022 sets out that development must "ensure height, scale, massing and arrangement respond positively to the existing townscape, character and context" and "better reveal local distinctiveness and architectural character; and conserve and enhance the significance of the local historic environment."

86. The council's design team are of the view that pre-application 24/EQ/0002 and planning application 19/AP/2544 have set out the maximum feasible massing for the site - approximately 13m maximum height - 4 storeys.

87. The description of application reference number 19/AP/2544 is: 'Demolition of all existing buildings; construction of 2no. three storey blocks and 2no. part three and part four storey blocks containing 36no. self-contained flats comprising 15no. one bedroom units, 14no. two bedroom units and 7no. three bedroom units; closure of northern access from Bush Road; and provision of associated landscaping, parking and turning areas.' The application was refused on 29.06.2023 for the two following reasons:

1. The proposed development would not provide the maximum viable amount of social rented and intermediate homes (with a minimum of 35%, subject to viability) which is contrary to Policy P1 (Social rented and intermediate housing) of the Southwark Plan 2022.
2. The proposed development would provide 58.3% of the development as two bedroom homes and 19.4% of the development as three or more bedroom homes which is contrary to Policy P2 (New family homes) of the Southwark Plan 2022.

88. The 19/AP/2544 appeal was dismissed on 07.06.2024. The main issues of the appeal were whether the proposal: '(i) makes adequate provision for affordable housing, taking account of the viability of the development; and (ii) represents a suitable housing mix.'

89. The 2019 residential application officer report states 'the height, scale and massing of the proposed development at three to four storeys is acceptable for the context of the site and would be of high quality responding to the surrounding area and site conditions.'

90. The maximum heights (excluding lift overruns) of the proposed development and the 2019 residential application are shown below:

Block	2019 residential scheme	Proposed development
A	13.05m (4 storeys)	13.25m (4 storeys)
B	12.7m (4 storeys)	10.35m (3 storeys)
C	10.5m (3 storeys)	7.4m (2 storeys)
D	10.25m (3 storeys)	

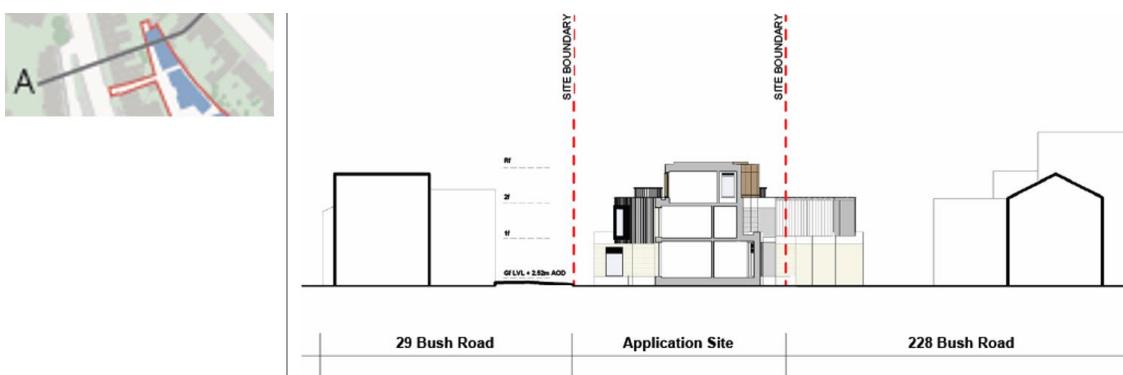
Image - Block A WEST ELEVATION

Block A WEST ELEVATION	
Dismissed appeal	Proposed development
Approximately 13m maximum height - 4 storeys	13.25m maximum height - 4 storeys (14.05m including lift overrun)

Image – proposed section block A: south elevation



Image – proposed section block C: south elevation



91. The applicant states that '*a primary design consideration was to ensure that the proposals remained consistent with the massing established by*' the 19/AP/2544 'scheme. The ... elevation and sectional drawings demonstrate the proposed built form, with the' 19/AP/2544 'scheme delineated in a blue wireframe for reference.'

Image - 19/AP/2544 scheme delineated in a blue – proposed west elevation

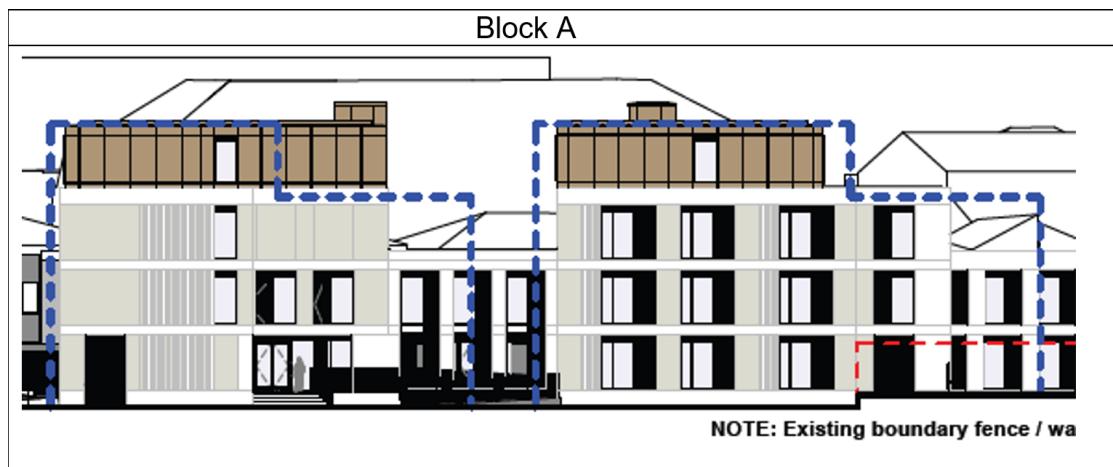


Image - 19/AP/2544 scheme delineated in a blue - proposed west elevation

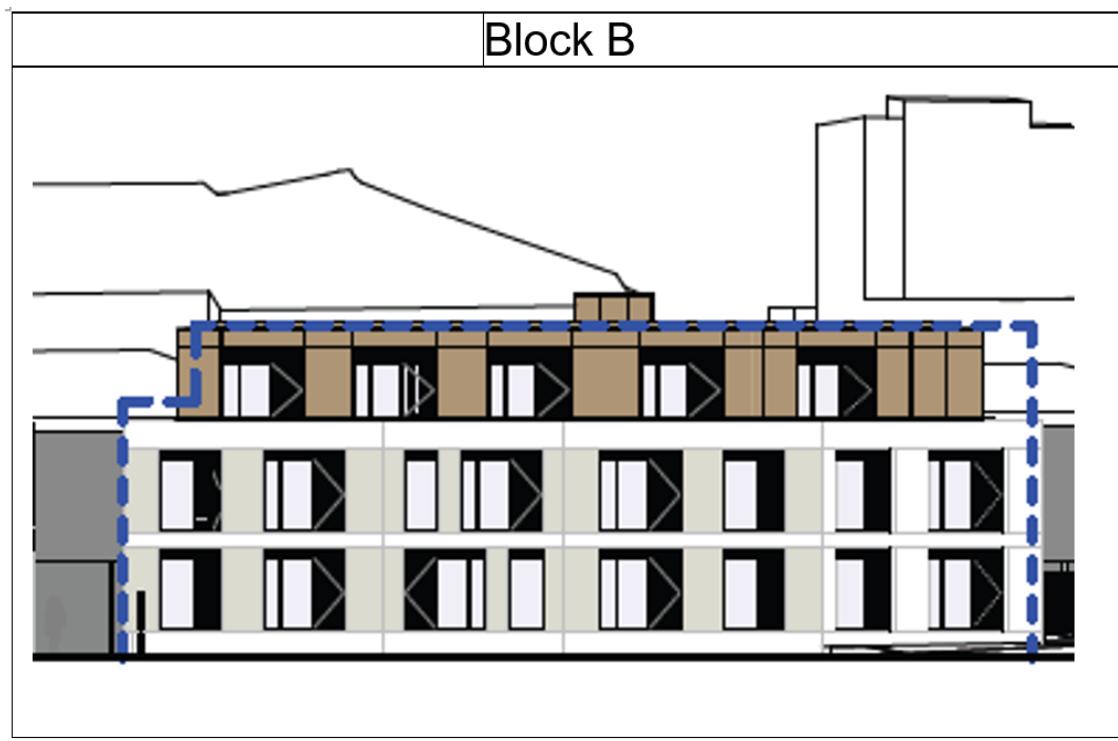


Image - 19/AP/2544 scheme delineated in a blue - proposed west elevation

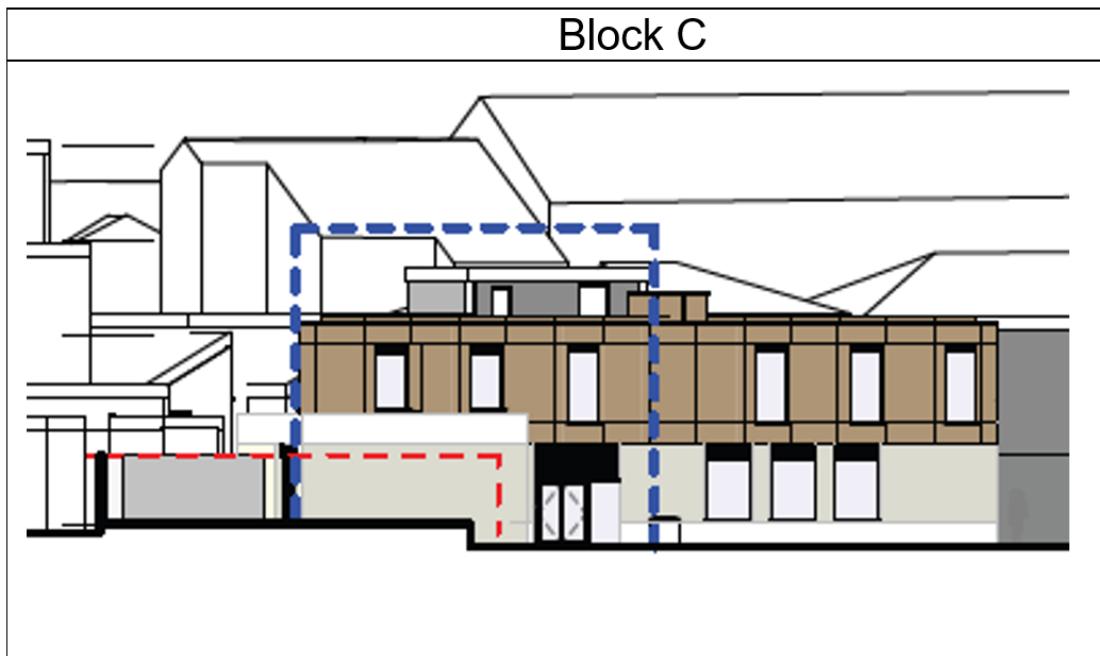
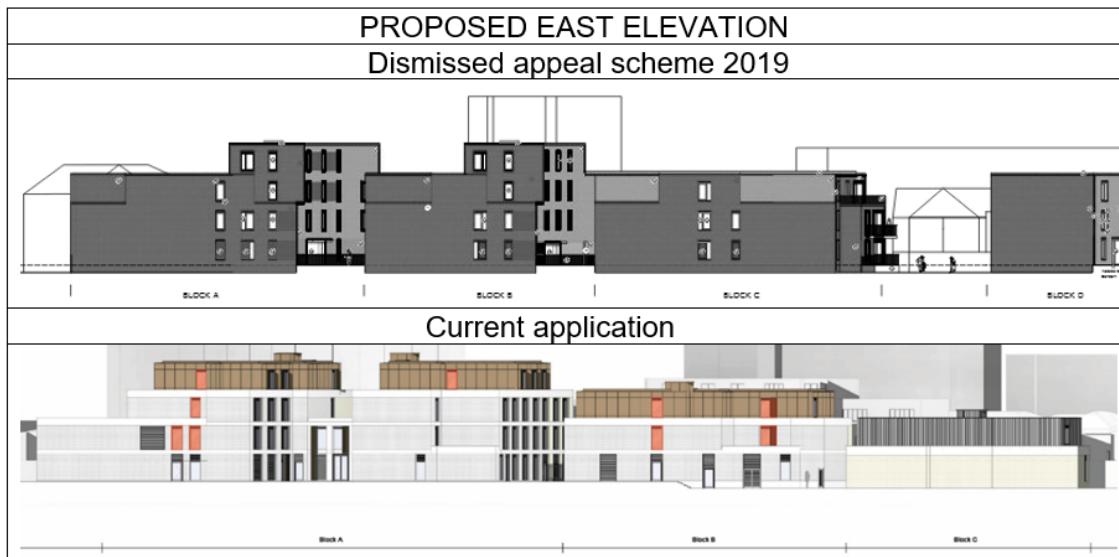


Image – comparison east elevation: 2019 dismissed appeal and current proposal



92. Planning officers consider that any increase in massing, scale and height compared to the 19/AP/2544 scheme would be marginal and would be acceptable.

#### Architectural design and material

93. Policy P14 (Design Quality) of the Southwark Plan 2022 sets out that development must provide "High standards of design including building fabric, function and composition" and "Innovative design solutions that are specific to the site's historic context, topography and constraints".

94. Objectors raised concern that no detail of materials has been submitted.

95. Planning officers however consider that adequate detail of materials has been submitted. The proposed materials appear contextual. The use of pre-cast stone is encouraged/supported. The proposed window reveals, and stepped brickwork shown on the edge of blocks are supported. It is recommended that a sample of materials be secured by way of condition. In addition, the size of the reveals should be decent and sufficient. The size of the window reveals would be secured by way of condition. Overall, the materials and the articulation of the façade are supported. Planning officers requested the material palette for the upper floor of the proposed 2-storey commercial block (Block C), be revised the material for its upper floor. The proposed ribbed black metalwork is acceptable as it would make this block more readable. The amended west elevation with oriel windows in black metal frame (cheeks, head and soffit) is also to the satisfactory of planning officers.

**Image – proposed west elevation block C**

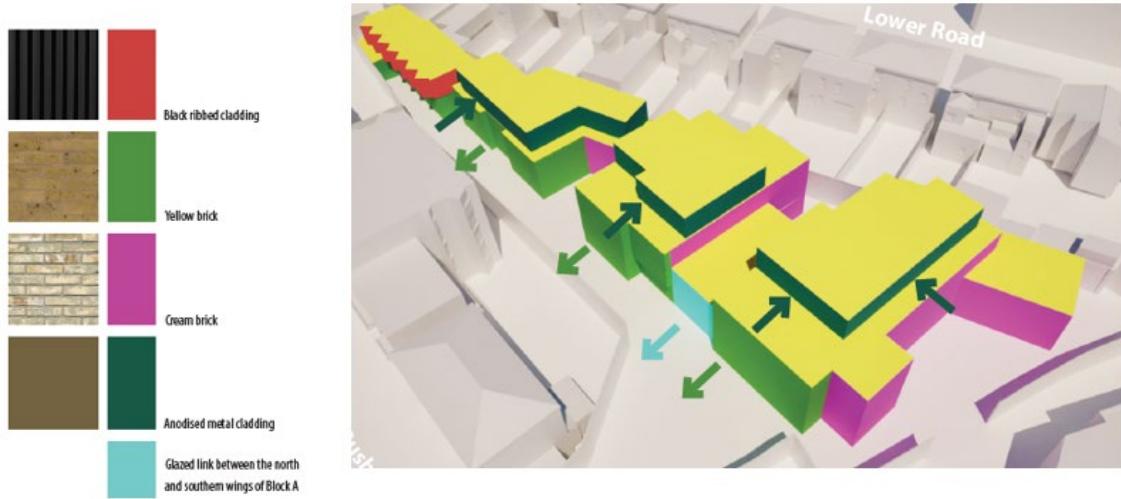


96.

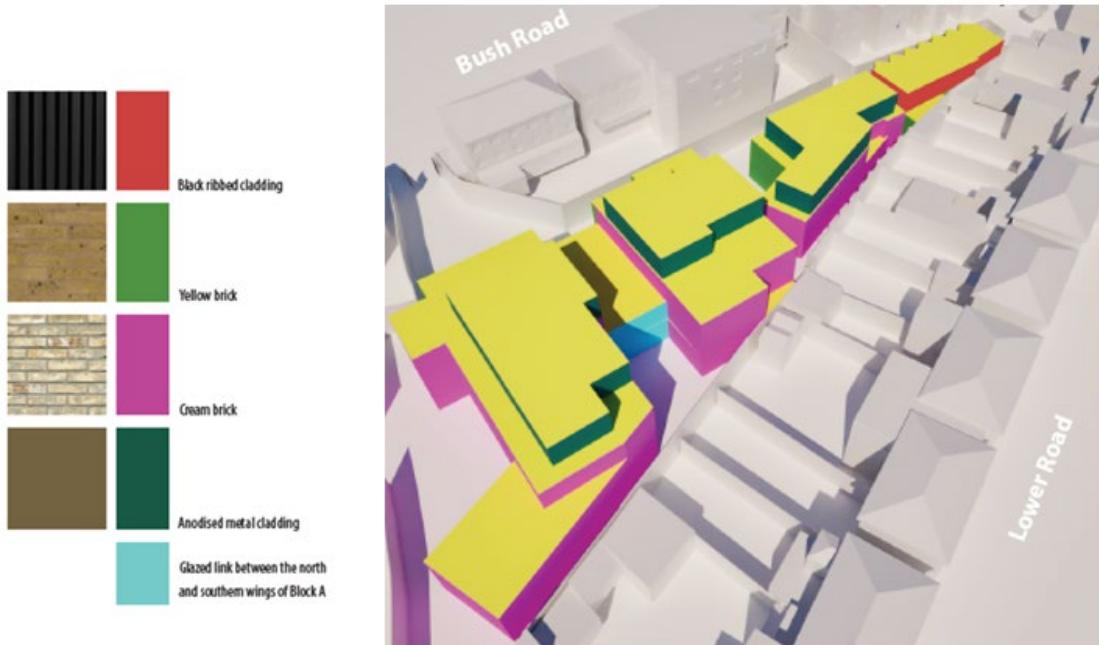
London Stock brick is prominent material to the Victorian Housing along Bush Road. Block C (Commercial) to the ground floor the facade would be expressed in yellow stock brick as a reference to the industrial building that previously occupied the site. The upper storey would be expressed in black metal. The previous industrial building on the site comprised of a brick ground floor and a metal roof. To the inward facing elevations to Blocks A and B a pale brick would be utilised. This is to bring light into courtyard spaces making them light and bright spaces.

**Image – proposed materials**

Proposed materials: view from the south-west

**Image – proposed materials**

Proposed materials: view from the south-east



97. The elevations of the development are shown in the following images and reproduce the details included on the submitted architectural drawings.

**Image – block A view to the east**



**Image – Blocks A, B and C view to the north**



**Image - Blocks B and C view to the north**



**Image – Block A view to the south**



**Image – Block A view to the north-west**

Block A

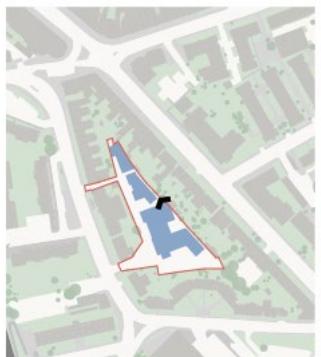
[View Looking North-West](#)



**Image – Block B view to the north-east**

Block B

[View Looking North-East](#)



**Image – Block C view to the north**



98. Objectors raised concern that the proposed plans for the eastern elevation of Block A contain air source heating pumps which appear intended to be located on a first-floor wall and thus will be directly visible from the adjoining neighbouring properties. The applicant submitted amended drawings, and the proposed site side roof plan shows proposed air source heating pumps on the south elevation of Block A. Planning officers welcome this amendment and consider that it would not detract from the design and appearance of the proposed development.

**Heritage considerations and townscape**

99. Objectors raised concern that the proposal would fail to respect the established architectural context. Objectors also raised concern that the site is surrounded by heritage property from the Georgian and Victorian eras and the proposed development would be entirely out of character and would have an adverse impact on the setting of these neighbouring properties.

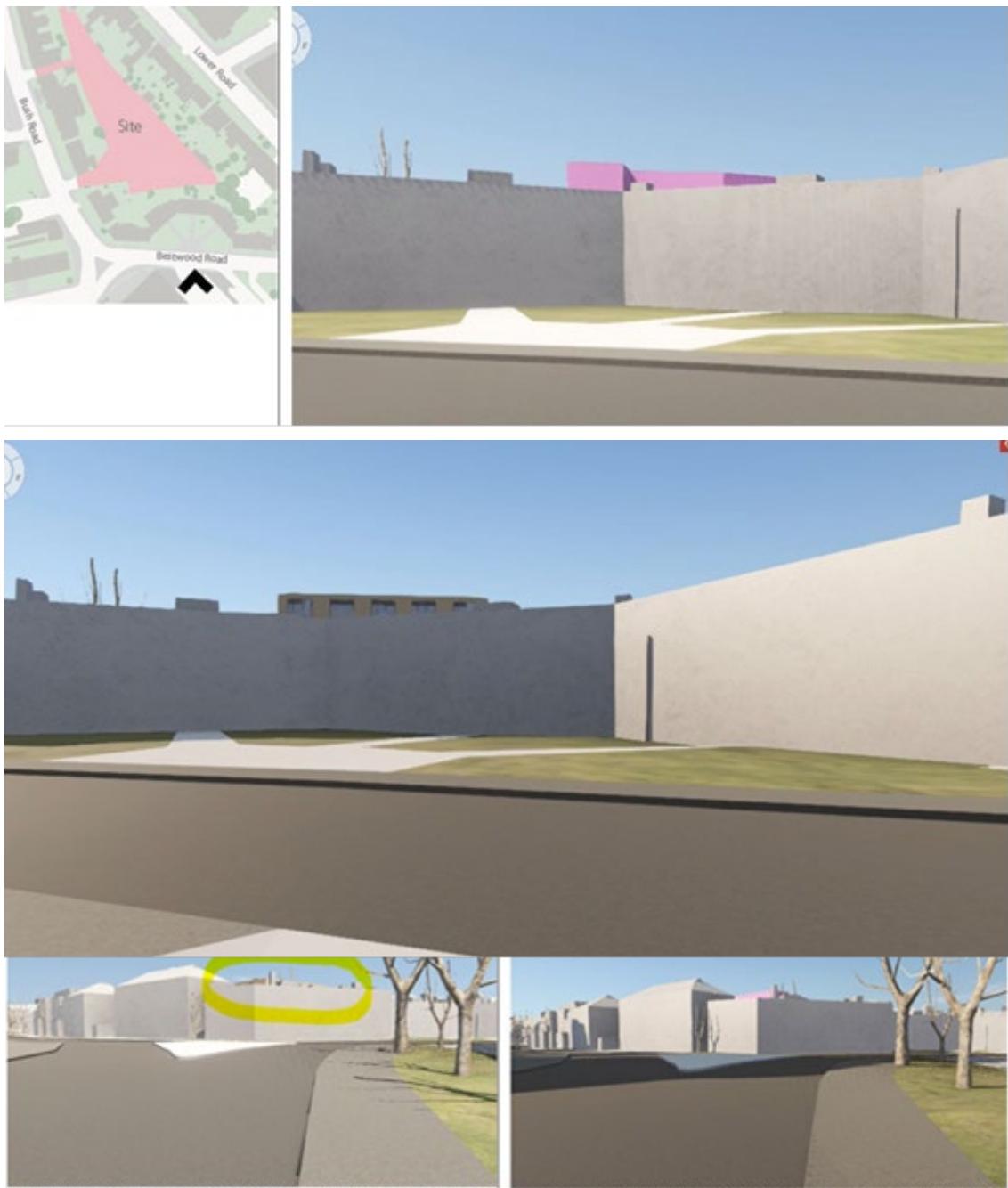
100. Objectors raised concern that the proposal would have a detrimental impact on the local street scene and views and would be out of keeping with the character of the area. In terms of townscape, the site is a triangular shape, bounded by low-rise and architecturally characteristic buildings and cohesive street frontage on all three sides. The urban grain of this immediate vicinity is of fine grain due to smaller building plots.

101. Policy P26 (Local List) of the Southwark Plan 2022 sets out that development must "take into account locally listed buildings and structures that positively contribute to local character and amenity".

102. The submitted Design and Access Statement has provided a number of

close-range views from Lower Road (opposite the locally listed buildings) and Bush Road. Council design officers tested some of the southern views on Vu.City. These views present the refused scheme and the current proposed scheme (in proposed condition and in cumulative condition). From these views, a small part of the upper floor will be visible over the parapets when viewed from across the road. The proposed scheme would not be overly dominant or harmful in townscape terms. The setback on the upper floor would help in terms of providing visual mitigation.

**Image – proposed view from the south**



103. The proposed development is acceptable in terms of form, bulk, height, mass, and materiality and does respond to the townscape and would provide a functional quality of architecture. Planning officers consider that the proposed

scheme has a high-quality architectural design overall.

## **Landscaping, trees, public spaces and urban greening**

### Landscaping

104. The existing site offers very little in the way of landscaped areas as the northern parcel of the site is occupied by a metal clad shed, the southern part of the site is also occupied by numerous low-quality metal clad structures and the existing hard standing material are a mixture of original cobbles and concrete service yard.
105. A landscaping plan includes 16 new trees along with soft landscaping.
106. 448sqm of outdoor amenity space will be delivered for the student residents and will include a new courtyard set in the rear elevation of Block A, on the east of the site. Other spaces to the north and south of Block A are also provided as student amenity space.
107. A Japanese Knotweed Eradication report has been submitted and is satisfactory.
108. Some of the roofscape would be utilised for bio-diverse roofs. This would be acceptable and would be conditioned.

### Trees

**Image - 2023 ProxiTree layer**



109. There are no existing trees on-site, but a screen grab from the 2023 ProxiTree layer identifying loss of canopy cover. A landscaping plan includes 16 new trees. As such, insufficient mitigation for loss of canopy cover is proposed. A landscaping plan includes 16 new trees. This could be addressed via a CAVAT valuation S106 if the applicant is not able to provide trees on-site. Policy P61 'Trees' of the Southwark Plan states:

'1. Development will be permitted if trees are planted as part of landscaping and public realm schemes, commensurate to the scale and type of development, and the character of the neighbourhood.

2. Development must retain and protect significant existing trees including: Development must retain and enhance the borough's trees and canopy cover; and

3. Where trees are removed to facilitate development, they should be replaced by new trees which result in no net loss of amenity, taking into account canopy cover as measured by stem girth; either

1. Within the development whereby valuation may be calculated using the Capital Asset Value for Amenity Trees (CAVAT) methodology or other assessment; or

2. If this is not possible, outside the development. In this case a financial contribution must be provided to improve borough tree planting located according to 'right tree right place' principles. The financial contribution will include ongoing maintenance costs where trees are planted in the public realm.'

110. The applicant responded advising that it would be unreasonable to a CAVAT financial contribution as '*there are no existing trees on site and as such no trees will be removed in connection with the proposed development. A total of 16 no replacement trees are provided.*'

### Urban greening

111. The proposal would meet London Plan Policy G5 by providing policy compliant Urban Greening Factor of 0.4. Green infrastructure features would include:

- biodiverse green roofs (0.0793 ha) – extensive green roof with substrate depth of 80–150 mm, planted with wildflowers and sedums
- rain gardens (0.0098 ha) – vegetated sustainable drainage elements; ground-based green walls (0.0372 ha) – modular or climber systems rooted in soil
- mixed scrub and hedgerows – native species for biodiversity and screening
- urban trees (0.0651 ha) – standard trees planted in pits; and
- flower-rich grassland and introduced shrubs for pollinators.

### **Ecology and biodiversity**

112. Objectors responded to consultation by the applicant in August 2024 and raised concern that the development would damage the environment. Objectors raised concern that the development would have a detrimental effect on local ecology and biodiversity.

113. Our ecologist raised concerns that the size of some habitat areas including the cleared scrub have been underrepresented within the habitat map and advised that the condition assessments for pre and post development should be provided within the BNG report. Dense ivy has been recorded on building 2. The likelihood of this providing a roosting feature for bats has not been discussed within the ecological assessment.

114. The Ecology Technical Note includes a bat assessment which found that existing buildings are mainly metal structures with negligible bat roost potential. Ivy cover is dense but over metal surfaces, offering no real access points to bats. The site location and lighting further reduce bat suitability.

115. A wildlife friendly lighting condition is recommended that would identify those areas/features that are particularly sensitive for bats and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places.

116. Our Ecologist's updated comment also advised that invasive species described within the ecology assessment should be removed and disposed of following appropriate guidelines. The ecological assessment specifies precautionary construction measures which include:

- Any trenches or excavations on site should be either covered over at night or a plank of wood placed in so as to allow any mammals to escape if they were to accidentally fall in
- Any open pipes or conduits laid should be blocked off each night to prevent any small mammals from entering them
- Disturbances, such as loud noises, vibrations, and floodlighting in association with night work being minimised.

## **Biodiversity Net Gain**

117. In England, Biodiversity Net Gain is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). This statutory framework is referred to as 'biodiversity net gain' in Planning Practice Guidance to distinguish it from other or more general biodiversity gains.

118. Our Ecologist initially advised that further information is required. Habitat degradation has occurred onsite with the removal of scrub habitat which has been recorded in the submitted BNG metric. The statutory metric user guide states that you must:

- evidence how this habitat type and condition has been determined in the user comments
- account for the time between the habitat loss and compensation using the 'delay in starting habitat creation or enhancement' function.

119. The applicant submitted a revised BNG metric calculation in response to the above.

## Biodiversity Gain Hierarchy

120. Planning authorities must consider how the Biodiversity Gain Hierarchy (set out in set out in Articles 37A and 37D of the Town and Country Planning (Development Management Procedure) (England) Order 2015) has been applied and, if it has not been applied, the reason or absence of a reason when determining the application.

121. Planning regulations require an assessment of whether the proposed habitat works to deliver biodiversity net gain onsite will deliver a significant increase in the biodiversity value of the site, compared to the pre-development biodiversity value. The distinctiveness, condition and size of the biodiversity habitat to be

delivered are all considerations which must be balanced.

- 122. Non-significant enhancements are habitat enhancements whose loss will not significantly decrease the development's biodiversity value.
- 123. The baseline value of habitats has been calculated to be 0.32 habitat units and 0.05 hedgerow units. The onsite measures propose to deliver an increase of 0.46 habitat units to 0.79 which equates to a net percentage gain of 145.02%, and an increase of 0.06 hedgerow units to 0.12 which equates to a net percentage gain of 117.12%. It is expected that this will be considered a significant gain and it is expected that a s106 will be required to secure this.
- 124. The Southwark Ecologist recommended that, to satisfy trading rules and meet the statutory requirements of BNG, offsite units or statutory credits are required to be purchased. The biodiversity gain hierarchy should be followed in this instance. It is requested that the applicant advises which option they expect to be undertaking. Note that the application is not considered to meet the requirements to use rule 4 of the statutory metric.
- 125. Planning officers note that the applicant considers that the 145% net gain is satisfactory overall and no mitigation is required.

### **Designing out crime, security and safety**

- 126. Significant concern was raised by planning officers under pre-application 24/EQ/0002 regarding the proposed layouts in terms of safety.
- 127. Some welcome improvements have been made in terms of safety and security for students under pre-application 24/EQ/0211. This includes separation of commercial and student access, the relocation of the student entrance so that it is visible from the street, the concierge-style arrangement in reception (which all students in blocks A and B would have to walk past) and the reconfiguration of the layouts to provide shorter corridors which are arranged in straight lines from the cores.
- 128. Objectors raised concern that the development would affect the security of neighbouring properties and suggest this need to be a secure gated accommodation, only accessible by the students and requiring scannable identification cards to enter.
- 129. The middle and southern end of the site would be occupied by the student accommodation that would offer rooms, ancillary spaces and amenity spaces offering natural surveillance to the north, south and western aspects of the site. The proposed student management plan proposes dedicated CCTV cameras across the site, electronic access control system to prevent unauthorised access into the building and the lifts would have access control to restrict use of the lifts to the management team and students only. As per the Transport Technical Note, the vehicle gate will be managed by the on-site management team. Further details would be secured a Delivery and Servicing Management Plan condition. The applicant states that the northern (commercial) tapered

section of the site are to be single aspect at ground floor level and outward facing offering natural surveillance to the south and west of the site

- 130. The applicant met with the Metropolitan Police's Designing Out Crime Officer on 4 February 2025
- 131. The Metropolitan Police feel that the development could achieve the security requirements of Secured by Design and recommend a Pre-Commencement condition (Secured by Design Measures) and a Pre-Occupation condition (Secured by Design Certification) to ensure end to end compliance with Secured by Design.

## Fire safety

- 132. Objectors raised concern regarding '*vehicles entering and exiting will create additional delays and hazards and that insufficient Emergency Access would be provided contrary to the London Plan Policy D12 and Building Safety Regulations. The proposal does not provide adequate emergency vehicle access, particularly for fire engines. London Plan Policy D12 (Fire Safety) requires all major developments to demonstrate that they have been designed with suitable fire safety measures. Given the limited access points and the dense layout of the scheme, the application fails to meet these crucial safety requirements.*'
- 133. The London Fire Brigade however has no observations.
- 134. The Town and Country Planning (Development Management Procedure and Section 62A Applications) (England) (Amendment) Order 2021 establishes that any relevant building is subject to Gateway 1 requirements. Relevant buildings are those which satisfy the 'height condition' and contain two or more dwellings or educational accommodation. The height condition is that (a) the building is 18 metres or more in height; or (b) the building contains 7 or more storeys. The Gateway 1 requirements outline that schemes which feature a relevant building must submit a fire safety statement form and the HSE must be consulted.
- 135. Planning officers confirm that the proposed development does not meet the definition of 'relevant building'.
- 136. *Policy D12 (B) of the London Plan (2021)*
- 137. Policy D12 (B) of the London Plan (2021) requires that all major developments must submit a fire statement. The fire statement should demonstrate how the proposals respond to and contain information on the requirements of both parts A and B of the London Plan Policy D12 on Fire Safety. This must be completed by a third-party, independent, suitably qualified person.
- 138. *Summary of Information Contained in Fire Statement*
- 139. Contains information of:

- Fire safety design features
- Fire appliances access and position of hydrants
- Fire safety management
- Construction materials to minimise risk of fire spread; and
- Means of escape and evacuation strategy.

140. Fire service pump appliance access will be available to each block.

141. There is an existing fire hydrant on the pavement outside 47 Bush Road.  
A new fire hydrant would be located in front of Block B.

**Image: indicative location of existing fire hydrant and fire hydrant (H)**



### *Assessment of Fire Safety Statement*

142. The proposed development would be in compliance with Policy D12 as it would provide access for fire appliances, assembly points, means of escape, evacuation lifts, fire detection and alarm and smoke control. Passive and active measures such as fire doors, firestopping, sprinklers, smoke vents and emergency lighting would also be provided. The proposal would also be in compliance in terms of construction materials, compartmentation, external fire spread and access and facilities such as dry risers in Block A, hydrants within 90m and wayfinding signage in Block A.
143. Paragraph 3.12.9 of Policy D12 explains that Fire Statements should be produced by someone who is “third-party independent and suitably qualified”. The council considers this to be a qualified engineer with relevant experience in fire safety, such as a chartered engineer registered with the Engineering Council by the Institution of Fire Engineers, or a suitably qualified and competent professional with the demonstrable experience to address the complexity of the design being proposed. This should be

evidenced in the fire statement. The council accepts Fire Statements in good faith on that basis. The duty to identify fire risks and hazards in premises and to take appropriate action lies solely with the developer.

144. The Fire Statement covers matters required by planning policy. This is in no way a professional technical assessment of the fire risks presented by the development. The London Fire Brigade (LFB) has been consulted with regards to the above-mentioned premises and have no observations.

## Archaeology

145. The planning statement does not identify any archaeological constraints or scheduled monuments on the site and no archaeological mitigation measures are mentioned. Our Archaeologist has no comment.

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

### Outlook and feeling of enclosure

146. Objectors raised concerns that the proposed redevelopment would have a significant detrimental impact on the amenity of the occupiers of the surrounding residential dwellings, in respect of outlook, and that the site visuals document '*only shows the impact of the proposed scheme from Bestwood Road and Bush Road with no visuals provided from Lower Road, despite the tallest element being closer to this road. It also only shows the impact from the street – which is minimal – and not from neighbouring properties which is where the most harmful impact would be felt.*'

147. Objectors raised concerns that the '*Planning Statement states that the proposed scheme “closely follows the footprint and massing which was agreed as being acceptable within the previous application ref. 19/AP/2544...” is disingenuous. The 2019 scheme proposed four separate blocks which break up the massing of the built form somewhat, whereas the current scheme proposes three blocks with the largest in height and mass - block A – sitting immediately adjacent to the boundaries of residential properties along Lower Road. This presents a material difference in the footprint, siting, mass and height from the 2019 application scheme and, as such, an assessment of the impact on the residents of these properties and other immediate neighbours is required, separately to the one made previously based on the 2019 scheme.*'

148. Objectors raised concern the development would lead to a feeling of enclosure to neighbouring properties. The proposed development builds up and to the extremities of the site, placing four storey buildings directly within the backland to residential properties of two stories height. In particular, the proposed plans appear to place the northeast edge of Block A directly on to the boundary to neighbouring properties and rapidly escalate in height.

149. Planning officers advised under pre-application 24/EQ/0002 that the proposed footprint, height, scale and massing would be similar to the previous planning application 19/AP/2544 and that in the assessment of the previous

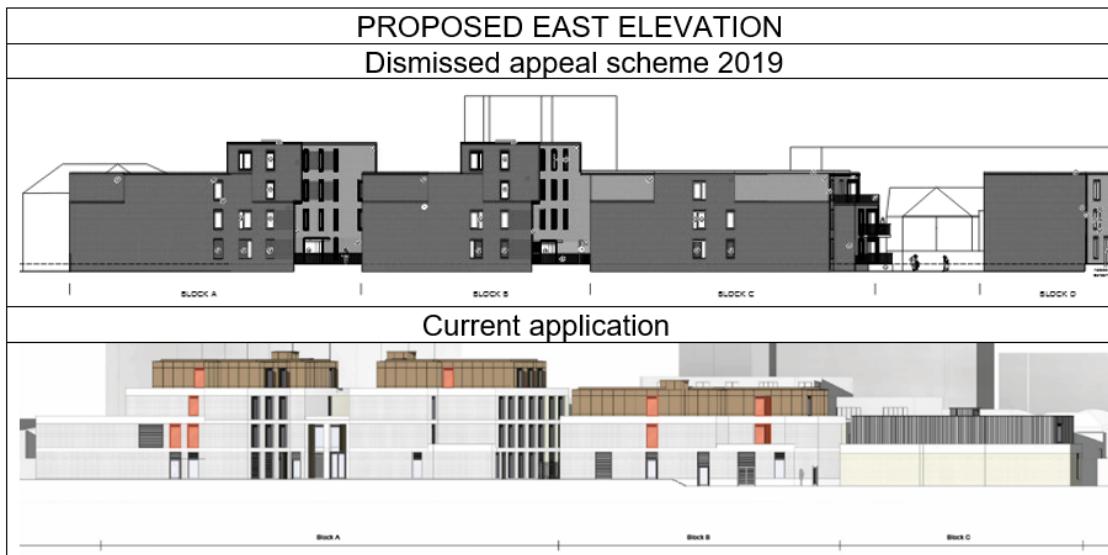
application it was found that the separation distances were acceptable and that there would not be a sense of enclosure created to existing neighbours.

150. The applicant submitted a 'comparative separation distances' drawing in November 2025. This drawing shows both the previously resolved scheme and the current planning application as a side-by-side comparison. The applicant has marked on non-habitable and habitable windows with their relative distances to the rear of the neighbouring properties to Bush Road, Lower Road and Bestwood Street.
151. Planning officers consider that the differences between the two schemes are minimal and the current proposal is not materially worse and often an improved relationship with the properties to Lower Road. It is noted that the applicant has improved the condition to the north of the site (Block C) where two storeys (Ground + First) are proposed where previously the residential block was taller comprising of three storeys (Ground + Two Upper Levels). Planning officers therefore consider that the proposal would be acceptable.
152. The existing site is currently separated off from the neighbouring rear gardens to the properties along Bush Road and Lower Road by a mix of brick boundary walls and close board timber fencing. It is proposed to retain the brick boundary walls and to ensure the amenity of neighbouring properties are maintained in this respect officers recommend that permission be subject to a boundary condition.

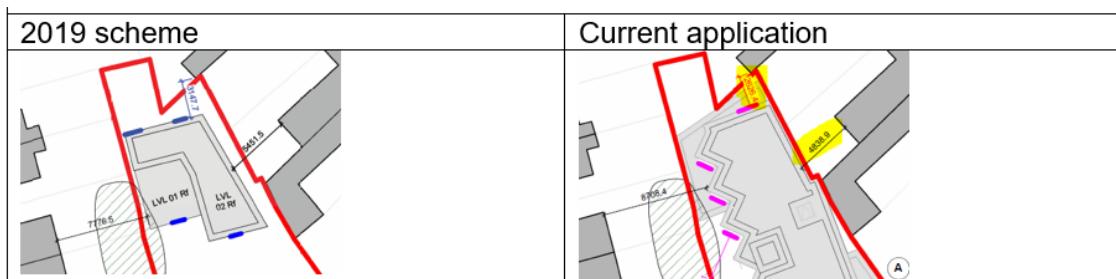
#### Loss of privacy / overlooking

153. Objectors raised concern regarding loss of privacy as many windows of the proposed building would overlook the adjacent gardens and have an unimpeded view to windows of habitable rooms
154. Planning officers consider that the separation distances would be similar compared to the 2019 residential scheme which raised by loss of privacy issues. The proposal would be acceptable as the proposed east elevation would have no windows to habitable rooms overlooking the rear of Lower Road properties.

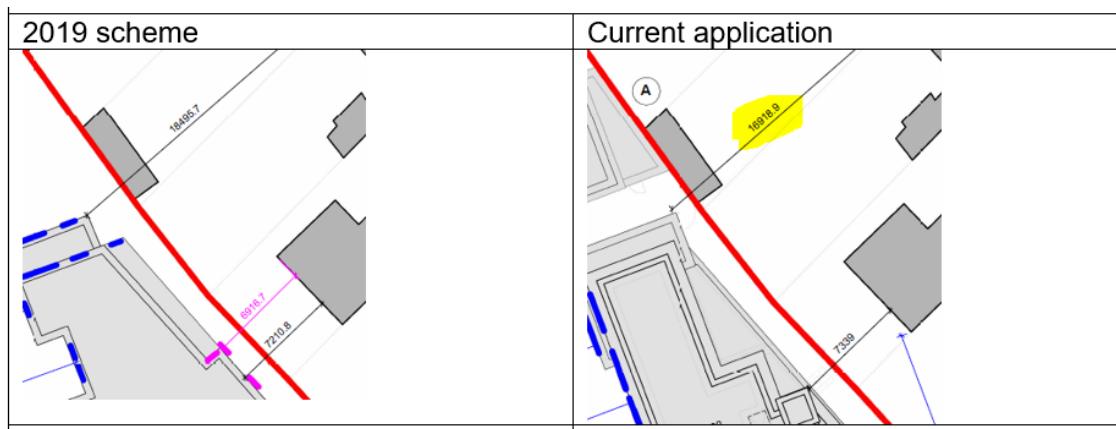
**Image – rear view from Lower Road properties (to the east of the site)**



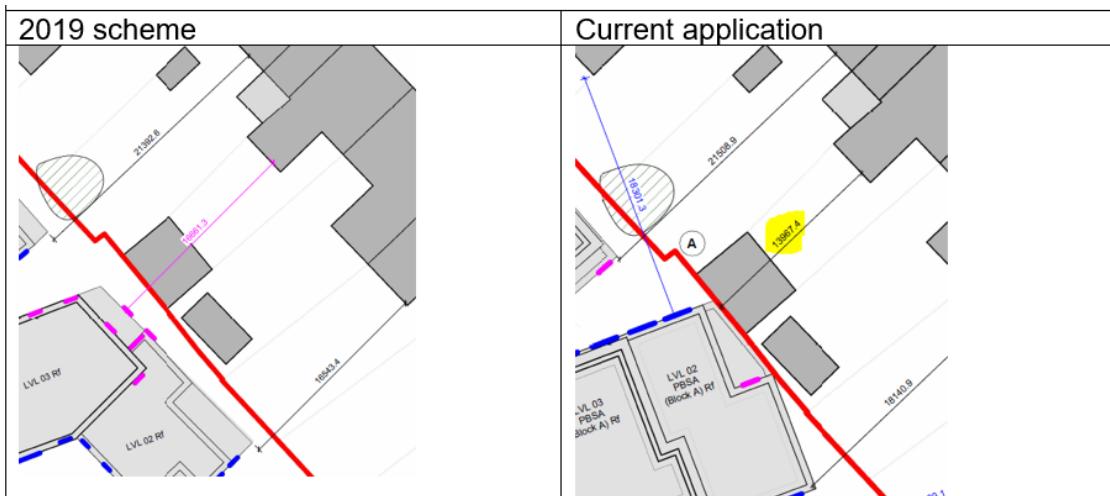
**Image - Relative distances to the rear of the neighbouring properties to Lower Road**



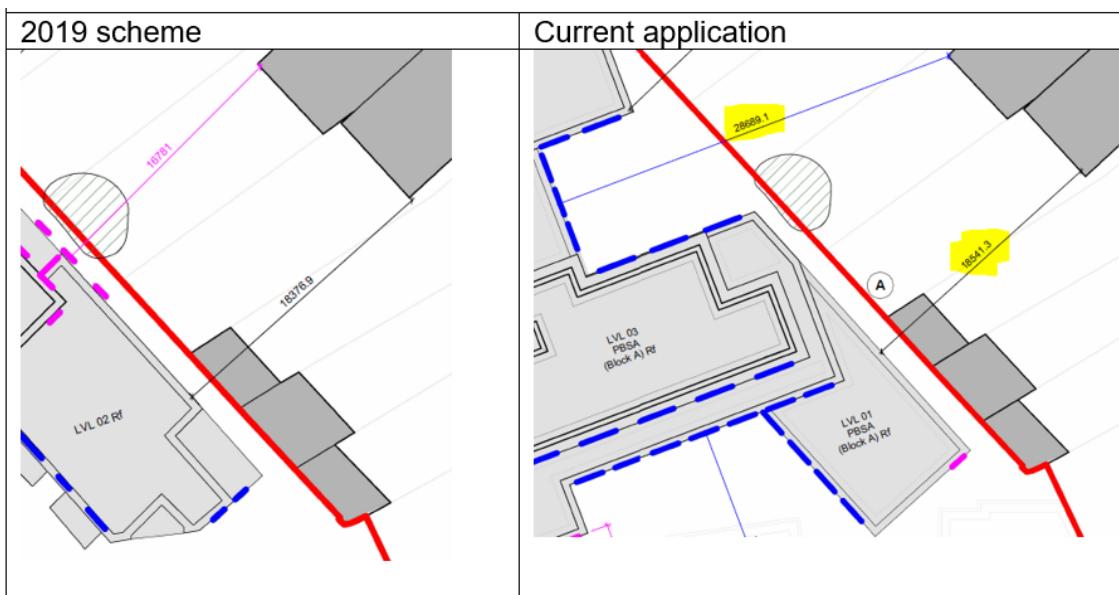
**Image - Relative distances to the rear of the neighbouring properties to Lower Road**



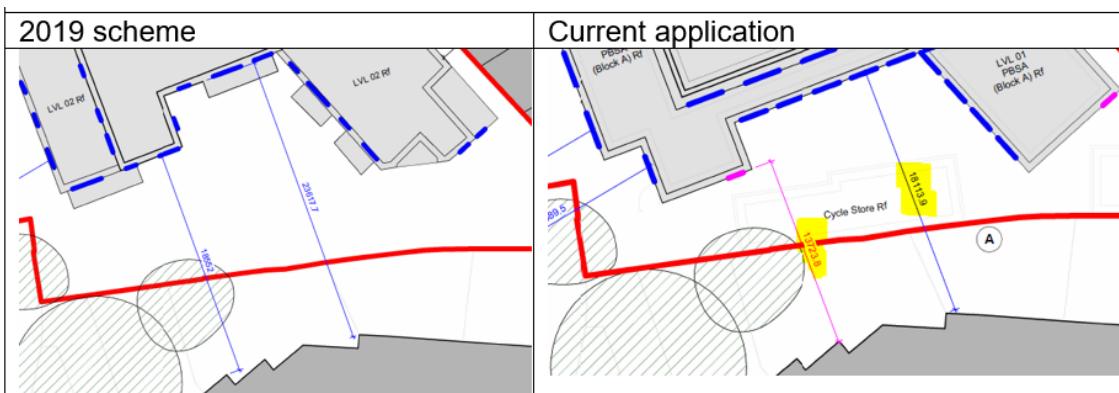
**Image - Relative distances to the rear of the neighbouring properties to Lower Road**



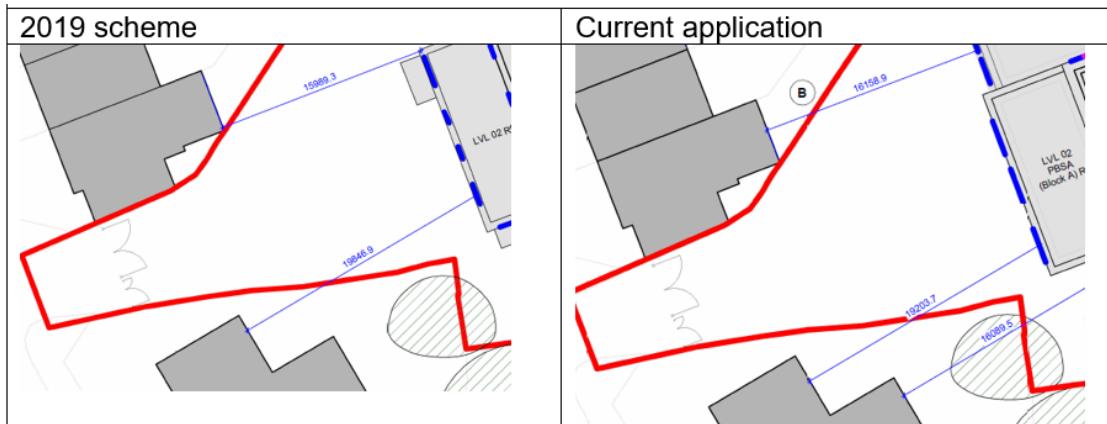
**Image - Relative distances to the rear of the neighbouring properties to Lower Road**



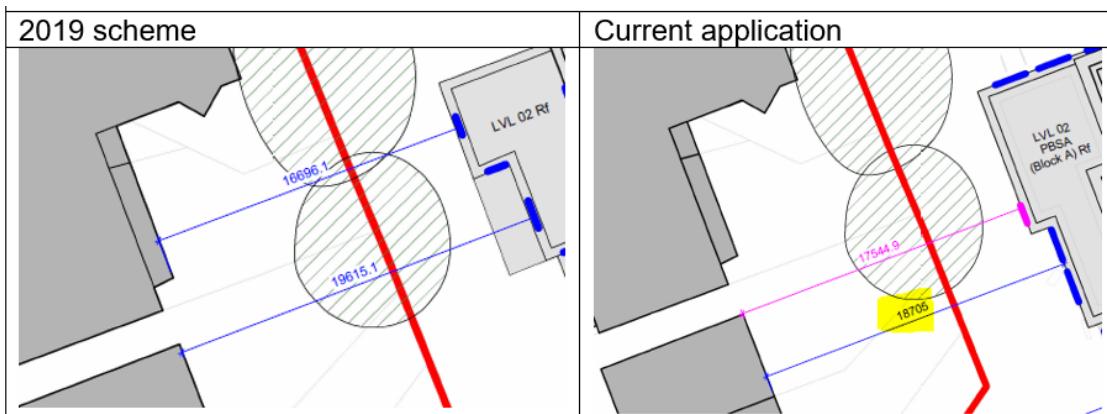
**Image - Relative distances to the rear of the neighbouring properties to Bush Road (south)**



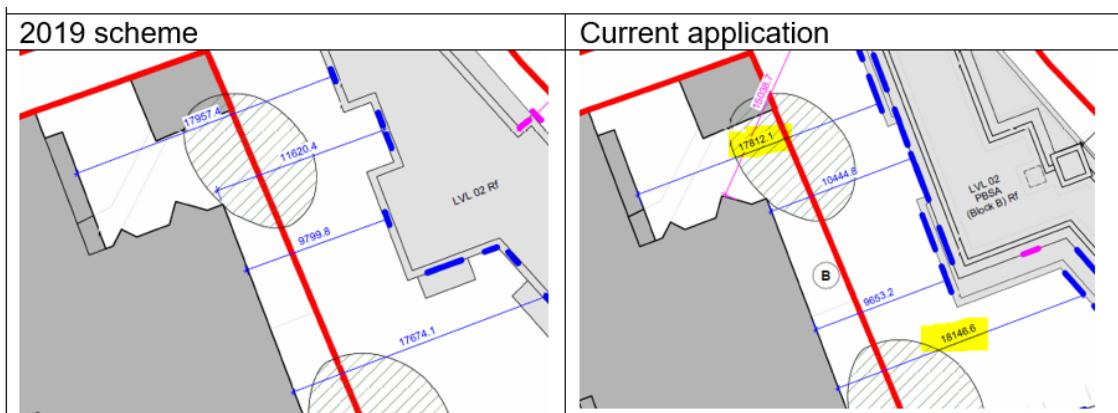
**Image - Relative distances to the rear of the neighbouring properties to Bush Road (west)**



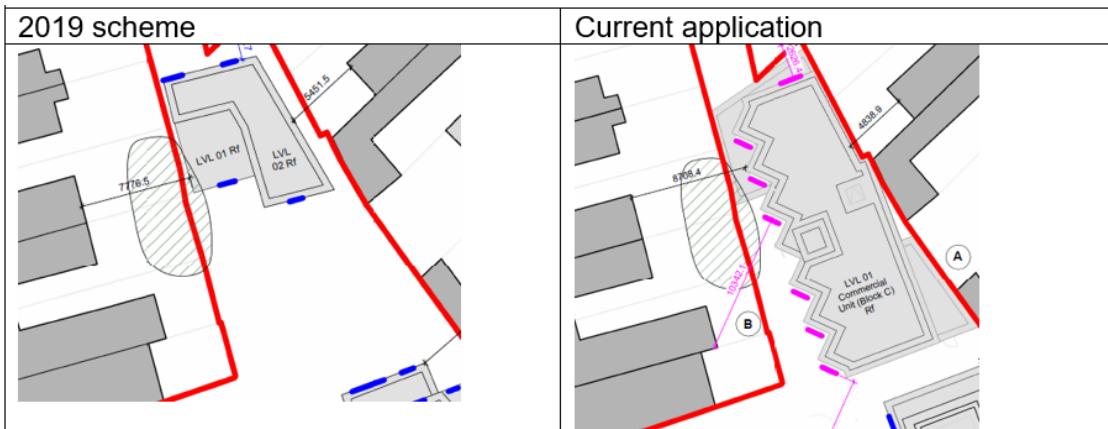
**Image - Relative distances to the rear of the neighbouring properties to Bush Road (west)**



**Image - Relative distances to the rear of the neighbouring properties to Bush Road (west)**



**Image - Relative distances to the rear of the neighbouring properties to Bush Road (west)**



### Daylight and sunlight

155. Objectors responded to consultation by the applicant in August 2024 and raised concern regarding the '*height of the proposal and its effect on access to natural light. They said that it should not be taller than the existing buildings and wished to reduce the height by at least one storey. They noted that they were dependent on the back aspect of their property for natural light, because the front had "significant tree coverage" and is partially underground*' (many houses on Lower Road have basements with street access).
156. Objectors submitted an independent professional assessment of the applicant's daylight and sunlight report. Objectors state that the independent professional assessment '*finds that the internal layout modelling used to show the impact of the scheme on the relevant properties along Lower Road with regard to daylight and sunlight levels is inaccurate, leading to data and results that are misleading and incorrect.*' Objectors also state the applicants' daylight and sunlight report does not show the reduction between the existing and proposed daylight distribution within the tabled results, nor is there evidence of how the rooms have been modelled and fails to recognise the light impact on the separate basement dwellings.
157. 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. Planning officers however accept that this is the standard approach and raise no issues to the methodology.
158. Objectors also state BRE guidance states that "...a higher degree of obstruction may be unavoidable if new developments are to match the height and proportions of existing buildings". However, the proposed development is not of the same height or proportions as the residential properties that surround it, indeed it is significantly higher. Objectors state that '*BRE guidelines consider the relationship between sites, and whether buildings are reasonably set back from the boundary. In this instance, the Lower Road properties are some 14-18m back from the rear boundary, whereas the proposed works are located*

*almost on to the boundary, of a much higher height.'*

159. The submitted daylight and sunlight assessment considers the impact on daylight and sunlight for neighbouring properties. The applicant also submitted a 'Review', dated 11/03/2025, as an addendum note in response to objections from neighbouring properties relating to daylight and sunlight.

### Daylight

160. The following daylight tests have been undertaken in the daylight and sunlight report:
  - 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 be noticeable.
  - No-Skyline (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.

#### *Vertical Sky Component (VSC)*

222 Lower Road

161. The 'Review' / addendum note states that the analysis model has been updated for 222 Lower Road and it shows that all windows would retain more than 0.8 times its current VSC value.

226 Lower Road

162. The 'Review' / addendum note states that the analysis model has been updated for 226 Lower Road and it shows that all windows would retain more than 0.8 times its current VSC value.

236 Lower Road

163. Objectors raise concerns that an independent professional assessment of the applicant's daylight and sunlight report found:

- The steps leading down from the rear glazed doors are over simplified, being too high and affecting the results to window W1 on what the report refer to as the ground floor
- There is a kitchen window on the ground floor, located beneath the external stairs, which has not been modelled/tested. As window W1 on the first floor fails the VSC assessment, it is clear the kitchen ground floor window will

also fail the VSC test

- 236 Lower Road had been poorly modelled, such that the results will not be a true reflection of the impacts from the proposed scheme. The CHP Surveyors' report showed VSC failures, and it is anticipated that these impacts will be proven to be worse, if the modelling were accurate.

164. The daylight and sunlight report indicate that for window W1 (Room R1) VSC would drop from 15.7% to 12.3%. A 21.7% reduction.

#### 1-21 Nemus Apartments, 21-43 Bush Road

165. The rear facing elevation of 1-21 Nemus Apartments, 21-43 Bush Road have first floor balconies, which place a significant constraint upon the ground floor windows below them (windows W1, W2, W3, W4, W5, W6, W15, W16 and W17). The results of the VSC assessment show that the ground floor windows show the most significant reductions, with several exceeding 30–50% loss, particularly W3–W6. First and second floors generally retain better VSC values, with losses mostly under 20%, and many under 10%. Overall, the impact is more pronounced at lower levels, but many windows still retain VSC values above BRE thresholds.

#### 17 Bush Road

166. The addendum Daylight and Sunlight report confirms that the assessment includes all windows and rooms and provides a more detailed analysis of the impact on the ground floor living room (R1) and bedroom (R2). This notes the following:

167. 'Living room (R1)

- The proposal results in a reduction in VSC of between 0.0 and 15.8% to the four windows serving the room. This meets BRE guidance.

#### Bedroom (R2)

- The proposal results in a reduction in VSC of 45% to the window serving the room, which is largely due to the proximity of the window to the boundary. In these situations, the BRE guidelines note that it may not be possible to meet the target, as any development would result in a large impact.'

#### *Daylight distribution*

168. Objectors state the applicants' daylight and sunlight report does not show the reduction between the existing and proposed daylight distribution within the tabled results, nor is there evidence of how the rooms have been modelled. Objectors state this is a disingenuous approach to running the daylight distribution assessment, as by not including the plans of the rooms tested, residents have no way in which to check whether CHP Surveyors have accurately represented the rooms tested.

169. Objectors raised concerns on the impact of reduced daylight when working from home.

170. Objectors raise concerns that there is no “percentage of room in front of NSL”, as the daylight distribution test wholly focusses on the reduction in light between the existing and proposed conditions. The CHP Surveyors’ report does not show the reduction between the existing and proposed within the tabled results, nor is there evidence of how the rooms have been modelled.

171. Objectors raise concerns that an independent professional assessment of the applicant’s daylight and sunlight report found:

- The internal layouts of 234 Lower Road, as well as the ground floor of 236 Lower Road are not correct. For the ground floor of 236 Lower Road, it has been assumed that the kitchen is lit by three windows, when in fact there is only one, but even then, the daylight distribution assessment shows a failure to the BRE guidelines with a reduction of 40%. The other ground floor room to 236 Lower Road is on the cusp, but given CHP has not accurately represented the property, it too is also likely to fail the BRE guidelines test.
- The assessment of 234 Lower Road shows the ground floor living area to be also failing the BRE guidelines daylight distribution assessment with a 42% reduction in daylight, which again is expected to be worse than what CHP Surveyors has shown.
- The missing kitchen from the ground floor of 234 Lower Road will also be expected to fail the BRE guidelines daylight distribution assessment.

#### 222 Lower Road

172. The ‘Review’ / addendum note also states that for 222 Lower Road six rooms would have at least 0.8 times the existing NSL area. The seventh room would have 0.75 of its area of existing NSL.

#### 234 Lower Road

173. The ground floor would experience a notable reduction in daylight distribution and the upper floors would maintain high NSL compliance, with minimal or no impact.

#### 236 Lower Road

174. The ground floor would experience the most significant reduction in daylight distribution, especially Room R2. The total area of Room R2 is 16.1 m<sup>2</sup> total, with 15.0 m<sup>2</sup> in front of NSL (93%). This would reduce to 9.0 m<sup>2</sup> (56%) – a loss of 37 %. The upper floors would maintain high NSL compliance with no measurable loss.

#### 1-21 Nemus Apartments, 21-43 Bush Road

175. The NSL test for 1-21 Nemus Apartments, 21-43 Bush Road identifies that 3 of 40 rooms (7%) tested would not achieve the numerical values set out in the BRE guidelines. One of the rooms would retain 0.7 times its current value

and the other two rooms would retain at least 0.5 times its current value.

176. The assessment of daylight amenity within the neighbouring apartments has been assessed for all habitable rooms and 101 windows are shown VSC reductions exceeding 20%. There are 68 windows that would marginally fall below the target values, 29 windows with 30–40% reduction and 4 windows with >40% reduction.

### 17 Bush Road

177. The addendum Daylight and Sunlight report confirms that the assessment includes all windows and rooms and provides a more detailed analysis of the impact on the ground floor living room (R1) and bedroom (R2). This notes the following:

#### 178. 'Bedroom (R2)

The daylight distribution results confirm that 89% of the room would remain in front of the No Sky Line (NSL), which meets BRE guidance.' NSL would thus reduce to 0.11 its former value (i.e. an 11% reduction).

#### 179. Living room (R1)

The daylight distribution results confirm that 39% of the room would remain in front of the No Sky Line (NSL). NSL would thus reduce to 0.39 its former value (i.e. an 39% reduction). This would be contrary to guidance which 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).

### Sunlight

180. The BRE sunlight tests should be applied to all main living rooms and conservatories which have a window which faces within 90 degrees of due south. The guide states that kitchens and bedrooms are less important, although care should be taken not to block too much sunlight. The tests should also be applied to non-domestic buildings where there is a particular requirement for sunlight.
181. The test is intended to be applied to main windows which face within 90 degrees of due south. 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 BRE guide states that sunlight availability may be adversely affected if the centre of the window:
  - Receives less than 25% of annual probable sunlight hours, or less than 5% of annual probable sunlight hours between 21 September and 21 March and
  - Receives less than 0.8 times its former sunlight hours during either period and
  - Has a reduction in sunlight received over the whole year greater than 4% of probable sunlight hours

226 Lower Road

182. The 'Review' / addendum note states that the analysis model has been updated for 226 Lower Road and it shows that all windows would achieve the above numerical targets.

1-21 Nemus Apartments, 21-43 Bush Road

183. The sunlight assessment has shown all habitable rooms would achieve the recommended level of 25% total and 5% winter sunlight. As such, the levels of daylight and sunlight provided within the proposed accommodation would be acceptable.

17 Bush Road

184. The 'Review' / addendum note states that a sunlight test is not applicable as the main windows do not face within 90 degrees of due south.

Overshadowing of amenity spaces

185. The BRE guide also contains an objective overshadowing test. The guide recommends that at least 50% of the area of each amenity space should receive at least two hours of sunlight on 21 March. If an existing garden or amenity area does not meet the above, because of new development, and the area which can receive two hours of sunlight on 21 March is less than 0.8 times its former value, then the loss of light is likely to be noticeable.

186. Objectors raised concern regarding overshadowing of gardens of neighbouring properties. Objectors raised concerns that the '*sun-on-ground assessment for the rear garden and amenity areas does not appear to provide the statistical data for the sunlight losses. However, it is clear that the assessment of 234 Lower Road is not an accurate representation of the existing condition, due to the CHP Surveyors assessment model being inaccurate.*' Objectors are concerned with regards the reduction of receive within gardens.

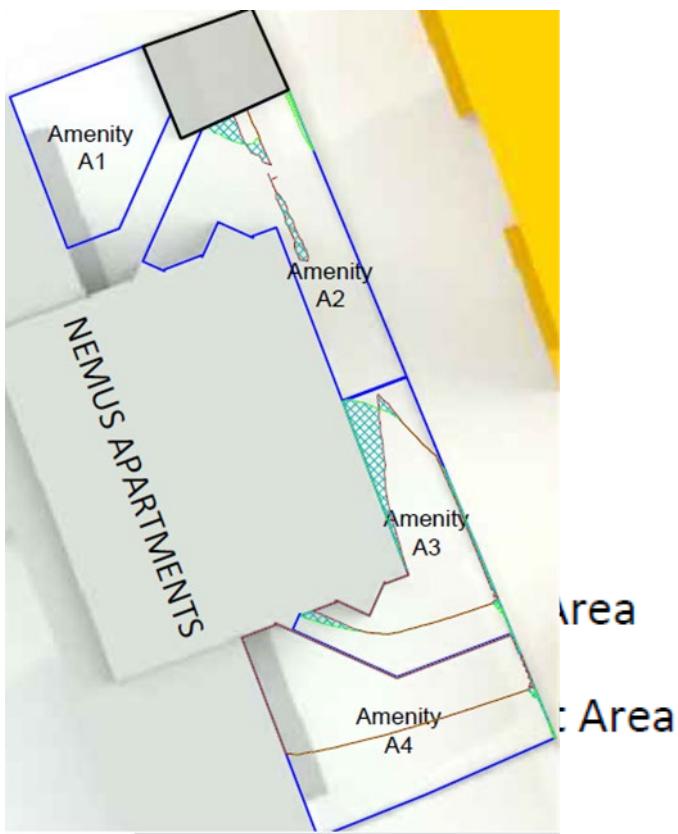
234 Lower Road

187. The overshadowing impact on 234 Lower Road would reduce the existing lit area from 83% to 77%. This area would receive adequate sunlight due to the proposed development.

Nemus Apartments

188. The 'Review' / addendum note states that the analysis model has been updated for Nemus Apartments and it shows that more than 50% of the area of each amenity space would receive at least two hours of sunlight on 21 March, with this also more than 0.8 times its former value.

### Image – Nemus Apartments overshadowing analysis



189. The 'Review' / addendum note states that more than 50% of the area of the amenity space would receive at least two hours of sunlight on 21 March, with this also more than 0.8 times its former value.

### Conclusion on daylight and sunlight

190. Objectors state that their independent professional assessment concludes that the proposed scheme would lead to unacceptable breaches of BRE guidelines, and that a significant reduction or relocation of Block A is required to result in an acceptable impact on the relevant residential properties along Lower Road regarding daylight and sunlight.

191. The daylight assessment has shown that for several neighbouring windows, daylight levels are limited in both the existing and proposed conditions. Most windows would experience a reduction in VSC, especially notable at lower ground and ground levels. The percentage loss is generally within acceptable BRE guidelines, with results for other neighbouring properties showing the levels of daylight would not significantly reduce.

192. The sunlight assessment has shown for several neighbouring properties sunlight levels are limited in both the existing and proposed conditions. The ratio of reduction demonstrates there would be a noticeable, but not significant, reduction in sunlight. The sunlight assessment does not include the Annual Probable Sunlight Hours (APSH) assessments for properties with

windows not facing 90 degrees of due north. Results for other neighbouring properties show for all living rooms and living, kitchen and dining rooms would achieve the recommended level of 25% total and 5% winter sunlight.

193. On balance, the impact on daylight and sunlight on some existing occupiers of would be noticeable but not significant. This impact will be outweighed by the additional new student rooms for which there is a demonstrated need.
194. Overall, the proposed development would not result in a significant impact on the surrounding residential properties.

### Right to light

195. Objectors raised concern regarding 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.

### Noise and vibration

196. Objectors raised concerns that the '*baseline data used was gathered in February 2020*' and '*question why up-to-date data wasn't used to assess the impact of the scheme against existing levels of noise in the area. Within the assessment itself:*

  - *No reference is made to the proposed air source heat pump bank, its location in proximity to properties along Bush Road ... , any noise generated by this and its potential impact on neighbour amenity.*
  - *Modelling has only been carried out for the commercial element of the proposed development to the north.*
  - *Furthermore, the assessment has not considered the level of noise generated by students with no acknowledgement that this is likely to be more impactful than a typical C3 residential use and therefore causing more harm to neighbour amenity.'*

197. Objectors raised concerns that '*there is plenty of evidence to support the view that purpose-built student accommodation (PBSA) schemes within existing residential areas can cause unacceptable harm to the amenity of those residents. Indeed, research of similar appeal schemes' 'found more than 20 appeal decisions, since 2017 involving PBSA schemes, where harm to residential amenity was cited as a reason for refusal.'* Objectors referred to '*one decision of particularly relevant in terms of its similar scale and location in a largely residential area*' where '*the Inspector cited the nature of student life dictating "an appreciable element of late-night activity, including comings and goings by foot and by taxi, among other things". The Inspector notes that, even with strict management plans and other measures in place, "there is likely to be a harmful level of noise and disturbance during the night" and that, overall, the proposal would harm the living conditions of neighbouring occupiers in conflict with local policy.'*
198. In respect of commercial noise from the Pub and noise from surrounding plant, our Environmental Protection Team advise that these are dealt with adequately

by building design and location. The assessment shows design meets noise policy to protect amenity and to protect the pub from 'agent of change' risks.

199. Our Environmental Protection Team had no objection regarding noise and recommended permission be granted subject to a compliance plant noise condition and an 'hours of use' condition of the commercial premises. Planning officers agree that it would be appropriate to control the hours of the commercial uses that it shall not be carried on outside of the hours 07:00 to 22:00 on any day. This would safeguard the amenity of neighbouring residential properties.
200. It is recommended that permission be subject to a student management plan condition. The condition shall contain details of the move in / move out strategy (drop-off locations, duration of loading/unloading slots, and allocation and management of time slot), security and access control, and visitor management. This would ensure that the use of the development 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.

## **Transport and highways**

### Site layout

### Gradients & Site Levels

201. The applicant submitted detailed plans of any ramps with gradient, rise and length clearly marked as per Southwark Plan Policy P55 and London Plan Policy T6.1 H(5).
202. Wheelchair users have been considered in detail in terms of access to the front door of the block from the back edge of the public highway; and also their passage through internal areas of buildings, to/from larger disabled / adapted cycling parking spaces.

### Trip generation

203. The applicant initially estimated that the PBSA development will generate 4 total delivery and servicing trips per day. As this is significantly lower than our transport team would expect, the applicant reviewed this figure. The council's transport team provided further comments discussed in the servicing and deliveries section below.

### *Commercial development*

204. The applicant provided trip generation data for delivery and servicing of the commercial development to the satisfaction of planning officers.

### *Users of the site*

205. We have reviewed the trip generation exercise for users of the site and do not expect this development to have negative impacts on the transport network.

## Servicing and deliveries

206. The applicant has provided vehicle tracking for a refuse vehicle and fire tender; and demonstrate safe ingress and egress.

207. Our transport team initially advised given the very constrained nature of this site, and the need for on-site delivery and servicing, the applicant should remove Blue Badge Bays from the proposal and provide 2 bays (delivery and servicing) on site. Our transport team also initially advised that it's hard for them to say if 1 bay would be adequate, as they don't have an accurate figure for delivery and servicing trips. Our transport team requested the submission of an updated trip generation report. The applicant responded in July 2025 confirming that an updated assessment will be detailed in their formal response and would include the following:

208. *"A total of 12 servicing trips can be expected per day because of the proposals. This equates to approximately 1 trip per hour, on average. This has been assessed using TRICS and reviewing similar approved PBSA schemes in Southwark, and the City of London estimates for servicing trip rates for the commercial element of the proposals. It is therefore considered that this level of demand can be accommodated within one servicing bay, notwithstanding that most deliveries associated with student accommodation will be undertaken by small vehicles e.g. mopeds and small box vans."*

209. Our transport team advised in August 2025 that *'there should be sufficient space to provide 2 (delivery and servicing) bays within the site considering the 2 Blue Badge bays would be ~12m long x 3.6m wide. While one bay would likely be sufficient for the student element, we are not convinced this would accommodate all commercial activity as well.'* Our transport team requested the applicant to provide the following:

- Clarification of how many deliveries would be undertaken by box vans vs mopeds/e-bikes
- 2 loading bays that can accommodate box vans on a submitted plan for review.

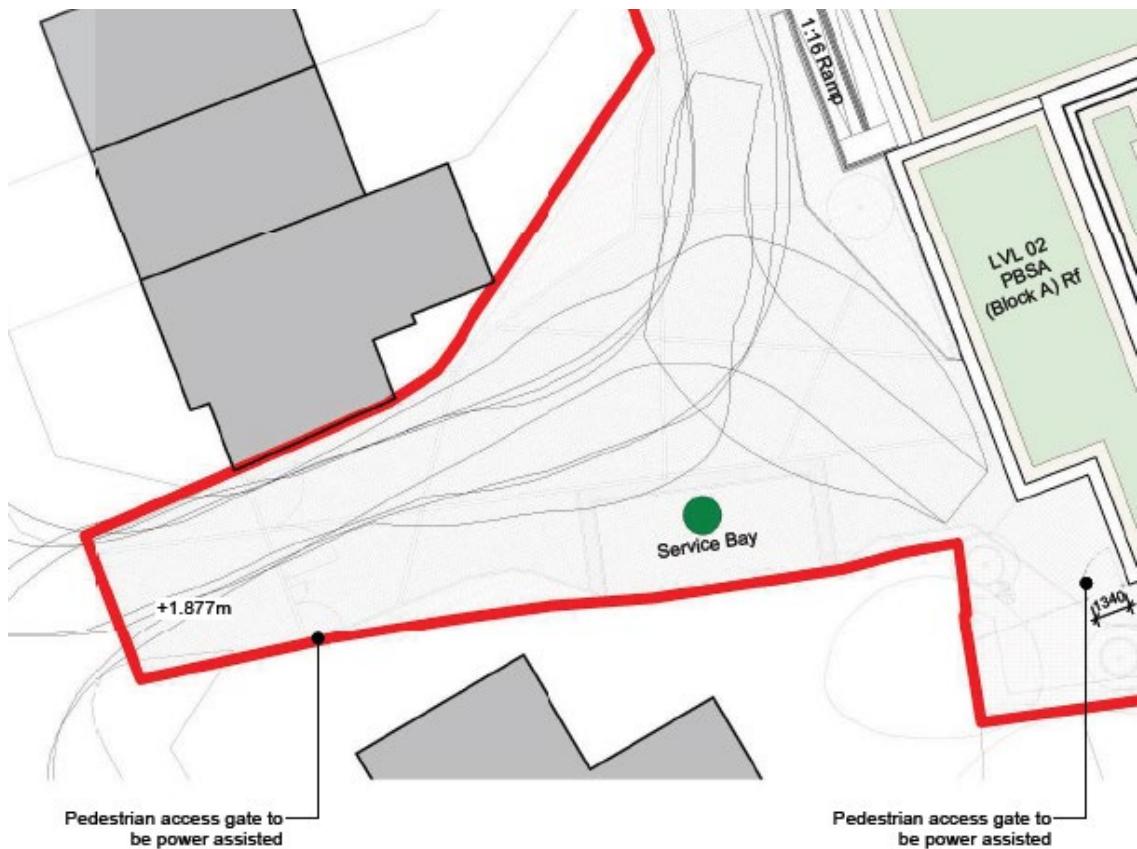
Servicing strategy including the following details:

- a) how the commercial unit at the north end of the site would be serviced (for example, use of a buggy to transport items from the loading bay at the south end)
- b) how moped and e-bike deliveries would be managed to prevent obstruction of the footways on Bush Road.

210. The applicant submitted a Transport Technical Note to address the above, and our transport team provided further comments advising the applicant has demonstrated that the site can accommodate delivery and servicing vehicles (predicted 12 two-way trips per day) with one servicing bay. While daily delivery/servicing trips will most likely exceed 12, the excess trips are likely to be undertaken on mopeds (i.e. for Deliveroo), and the site has space to

accommodate these.

**Image – location of service bay**



211. Neither Transport for London, our Transport team or our Highways team raised vehicle ingress/egress as a highway safety issue.
212. A delivery and servicing management plan (DSP) bond will be retained for Major developments and a fee taken for the purposes of monitoring whether this is accorded to. Both elements will be secured within the s106 agreement.

**Refuse storage and collection arrangements**

213. The applicant had demonstrated that PBSA waste can be collected within 10m of the refuse vehicle stopped in the turning head.

**Image – student element waste collection**



214. The waste collection strategy for the commercial block (Block C) would be acceptable. Commercial refuse will be managed privately.

**Image - waste collection strategy for the commercial block (Block C)**



**Car parking**

215. As the site is in PTAL 5, the proposed development must be car-free. The applicant states in the Transport Technical Note the vehicle gate will be managed by the on-site management team and the internal turning head will be managed via privately enforced parking controls.

**Blue Badge Parking Space**

216. The applicant has proposed 2 Blue Badge Bays within the red-line boundary of

the site. Given the very constrained nature of this site, and the need for on-site delivery and servicing, our Transport Team advised the applicant should remove Blue Badge Bays from the proposal and provide 2 bays (delivery and servicing) on site. The applicant submitted a Transport Technical Note to address the above, and our Transport Team provided further comments advising the applicant has demonstrated that the site can accommodate delivery and servicing vehicles (predicted 12 two-way trips per day) with one servicing bay. The 2 proposed Blue Badge parking bays would be acceptable.

### Parking Permits

217. As per Southwark Plan Policy P54, on-street parking permits will not be available for residents, students or businesses in current or future CPZs. This would be secured in the legal agreement.

### Car Club

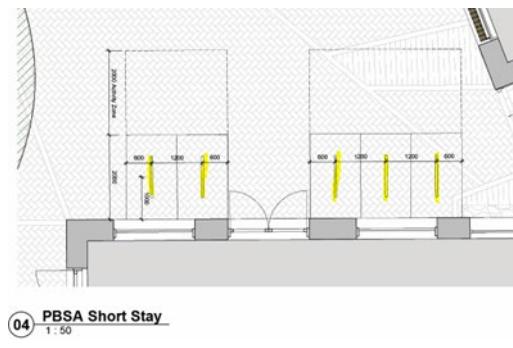
218. As this site has excellent public transport accessibility, and we aim to encourage sustainable transport among students, we do not feel a Car Club bay, vehicle or membership is necessary.

### Cycle parking and cycling facilities

#### *Cycle Parking – student accommodation*

219. The applicant has proposed 108 long stay spaces and 10 short stay spaces. This accords to Southwark Plan Policy P53 and London Plan Policy T5. The design of the short stay cycle store accord to LCDS Chapter 8. The applicant has demonstrated a minimum floor to ceiling height of 2.6 metres where two-tier racks are provided. This complies with our required floor to ceiling height.

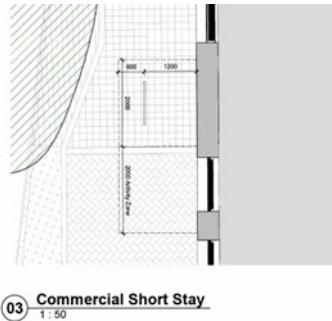
#### **Image - 10 short stay spaces**



220. The applicant has proposed 2 short stay cycle parking spaces for flexible Class E space (318sqm GIA). This does not accord to adopted policy, as the worst-case scenario must be applied for long-stay and short-stay requirements. In this case, the worst-case scenario is non-food retail for long-stay (1 space per 100sqm) and food retail for short-stay (1 space per 20sqm). This amounts to 4 long-stay spaces and 16 short-stay spaces. The applicant addressed this in a Transport Technical Note and note that Class E space is restricted to E(g)(i) and E(g)(iii), of which the 'worst-case' requirement is 1 space per 45sqm (short-

stay) and 1 space per 250sqm (long-stay) which have been accommodated. The applicant agreed to a condition restricting the proposed Class E space to E(g)(i) and E(g)(iii). The applicant also submitted a revised Short Stay Cycle drawing in August 2025 addressing the comments our transport team. Our Transport Team provided further comments advising that the revised drawings are acceptable.

### **Image – short stay commercial cycle parking**



### **Cycle Hire Expansion Contribution**

221. In accordance with Southwark Plan 2022 Policy P53, which promotes sustainable transport choices, there should be an expansion to cycle hire due to the size and scale of this proposal. TfL however did not request a financial contribution in this regard.

### **Pedestrian Access**

222. The proposed pedestrian access to the north of the site accords to adopted policy. The redundant vehicle crossover at the proposed pedestrian access must be removed and returned to a full kerb-height footway as part of a S278 agreement.

223. Our Transport Team advised that the applicant must provide a 1.2m wide, power assisted gate at this access to ensure use is restricted to pedestrians and wheelchair users only. This would be conditioned.

### **Vehicle Access/Crossover**

224. Fire service vehicles access is shown in the fire statement, and the swept path analysis is shown in Transport Statement.

225. The vehicle crossover at the proposed pedestrian access to the northwest of the site must be removed as part of the S278 agreement.

### **Move-in/Move-out Strategy**

226. The applicant has submitted a Student Management Plan detailing how move-in and move-out periods will be managed. The move-in/move-out strategy will

be secured by condition.

### Travel Plan

227. The applicant has submitted a framework travel plan with a target of increasing active travel by five percent. The applicant must confirm in their travel plan (to be conditioned) that this increase in active travel comes from public transport use.
228. It is recommended that the Travel Plan be conditioned (4-part condition).
229. When the development reaches 50% occupancy, the applicant must submit a full Travel Plan which includes a baseline mode share survey and mode share targets for a 5-year period.
230. Time will be clocked from the date of the baseline survey onwards – at the end of the 1st, 3rd and 5th year of operation of the approved Travel Plan, the applicant must submit a detailed survey showing the methods of transport used by all those users of the building to and from the site and how this compares with the proposed measures. The applicant must also outline any additional measures to be taken to encourage the use of walking and cycling to the site.

### Highway works

231. A Section 278 Agreement will be required for works to the public highway, as per the details which will be set out by Highways. Suggested scope from Transport Planning as follows:
  - Resurfacing of footways around the site
  - Removal of redundant vehicle crossovers and restoration to full-height kerb footway
  - Introduction of new and/or upgraded and resurfaced vehicle crossover
  - Bond for value of works, plus a monitoring fee, will be secured by Highways.

## **Environmental matters**

### Construction management

232. The applicant has submitted a framework Construction Environmental Management Plan (D/CEMP). The D/CEMP will be conditioned. Due to the sensitive location and size of the scheme, penalties will be meted out to transport operators not complying with the routeing of construction vehicles and delivery slots.

### Flood risk

233. The NPPF 2023 states that planning decisions must take into account the current and long-term implications for flood risk in order to minimise the vulnerability of communities and improve resilience. Where development is

necessary in higher risk areas, development should be made safe for its lifetime without increasing flood risk elsewhere. Certain steps need to be followed when reaching a planning decision on development in higher risk areas, with risks managed through suitable adaptation measures. The advice of flood risk management authorities also needs to be taken into account (NPPF, 166).

### *Sewage*

234. Objectors raised concern with regard the impact of the proposal on sewage issues they have experienced on Lower Road. Objectors note the developers would introduce several more plumbing demands on an already strained system. Due to flash flooding and shallow and very ancient pipework some residents have experienced flooding in rear gardens (main drains) and front garden drains.
235. Thames Water were consulted but did not comment.
236. The Sustainable Urban Drainage System document states that the site is not within a surface water flood risk catchment area and that existing drainage comprises 3 no connections into combined sewers. The Flood Risk Assessment and Drainage Strategy document state that the site currently drains into two existing Thames Water combined sewers via three outfalls with a total existing discharge capacity: 50.5 l/s:
  - Northwest corner: 150mm pipe → 381mm sewer in Bush Road → capacity ~30 l/s
  - Southeast boundary: 100mm pipe → 375mm sewer → capacity ~6 l/s
  - Southwest boundary: 150/225mm pipe → 375mm sewer → capacity ~14.5 l/s.
237. The new drainage strategy aims to significantly reduce discharge into the combined sewer system. Surface water will be attenuated to 2.5 l/s using sustainable urban drainage measures. Foul water will be discharged via gravity sewers into the existing combined sewer. It is noted the 2.5 l/s discharge rate was previously agreed with the Lead Local Flood Authority (LLFA) under planning application 19/AP/2544. The drainage hierarchy from the London Plan Policy SI 13 was followed, with combined sewer discharge being the last resort. Infiltration is limited due to site geology (clay and silt), so connection to combined sewers remains necessary.

### *Drainage Strategy*

238. The maximum discharge rate would be 2.5 l/. Maintenance tasks and frequencies have however not been provided for all drainage features, but this is suitable to be conditioned. The Southwark flood risk team recommend approval of the application with the addition of conditions in relation to details of Drainage Strategy and details of Drainage Strategy – Verification Report.

### *Water pollution*

239. The Environment Agency have no objection to the proposed development as submitted, subject to the inclusion of a remediation strategy condition. This condition was also advised by our Environmental Protection Team to ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution, in line with the National Planning Policy Framework (NPPF).

Site context – flood risk

240. The development site is located in Flood Zone 3a, as identified by the Environment Agency flood map. Zone 1 is 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

241. 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.

242. The site was not assessed as part of the council's Strategic Flood Risk Assessment (2017). The applicant has provided a site-specific flood risk assessment which sets out the sequential test in terms of the suitability of other suitable, lower risk sites being available for the development.

243. NPPF paragraph 173 states 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.

244. The applicant states that '*a large part of the borough is located within the indicative Flood Zones 2 and 3, which has the highest level of risk. Over two thirds of the population and properties in the borough are located within this area. The borough has the second highest population living in Flood Zones of all local authorities in the country. From a strategic perspective, it would be unreasonable therefore to locate all new development in Southwark in Flood Zone 1.*'

245. Officers consider that as no basements are proposed and habitable rooms and more vulnerable uses would be above ground floor level the proposed development would comply with these aspects of the sequential test requirements.

246. The applicant further sets out given the considerations below they consider that the proposed site passes the sequential test:

- Large parts of the borough within Flood Zones 2 and 3 experience high levels of deprivation. A key objective of Southwark's Sustainable Community Strategy and Corporate Plan is to regenerate these areas and provide additional and better-quality homes, improved access to employment and public services and an improved environment. These are concentrated in the North of the borough (in Flood Zones 2 and 3).
- Consideration also needs to be given to the existence of flood defences which currently provide Southwark with a high level of protection from tidal flooding. These defences mean that the actual chance of flooding from the River Thames is low.

247. The design of the scheme would incorporate flood resistance measures. Flood resistance refers to the ability of a building or site to prevent water from entering during a flood event. The Flood Risk Assessment states finished Floor Levels (FFL) are set at 2.52m AOD, which is 300mm above the Maximum Likely Water Level (MLWL) of 2.22m AOD for the 2100 breach scenario. The site benefits from raised flood defences and the Thames Barrier, which provide protection against a 1 in 1000-year tidal flood event. The development is located in a defended Flood Zone 3a, meaning flood defences are in place to reduce the likelihood of flooding.

248. The design of the scheme would be resilient. Flood resilience refers to the ability of a building or site to recover quickly after flooding, minimizing damage and disruption. The Flood Risk Assessment states a robust flood warning plan will be developed and communicated to future occupants. The design ensures that habitable areas are elevated, reducing the risk of internal damage. The SuDS strategy includes green roofs to slow rainwater runoff, porous paving to

allow water to drain through surfaces and an underground attenuation (900mm pipe) to store excess water and release it slowly. The drainage system is designed to handle a 1 in 100-year rainfall event with a 40% climate change. The Flood Risk Assessment and Drainage Strategy does not explicitly list resilient construction materials. The Flood Risk Assessment and Drainage Strategy for Bush includes the following provisions that ensure space for water to flow:

- The strategy incorporates multiple Sustainable Urban Drainage Systems features that allow water to be managed on-site, slowing its flow and providing temporary storage
- Reduced Impermeable Area: The proposed development reduces the impermeable area from 0.32 hectares to 0.266 hectares, creating more space for water to be absorbed or stored
- Controlled Discharge: Water is discharged into the existing combined sewer via a Hydrobrake flow control device, ensuring that water is released slowly and predictably, preventing downstream flooding
- Overflow and Exceedance Routes: The drainage layout includes exceedance routes, which are planned pathways for water to flow safely across the site during extreme rainfall events, reducing the risk of damage.

249. The Flood Risk Assessment and Drainage Strategy includes the following provisions for safe escape routes in the event of flooding.

- Finished Floor Levels (FFL): The proposed FFL is 2.52m AOD, which is 300mm above the Maximum Likely Water Level (MLWL) of 2.22m AOD in the event of a breach of the Thames flood defences. This elevation ensures that habitable areas remain dry during extreme flood events, allowing occupants time to evacuate safely.
- Flood Warning and Evacuation Plan: A robust flood warning plan will be developed and communicated to future occupants. The site is within an area covered by the Environment Agency's Flood Warning Service, which provides real-time alerts for tidal and river flooding. Occupants will be encouraged to sign up for this service to receive early warnings.
- Safe Access and Egress: The site layout and elevation ensure that safe access and egress routes are available during flood events. These routes are designed to remain above flood levels, particularly in the 2100 breach scenario, which is the worst-case modelled event.
- Strategic Location Benefits: The site is located in a defended Flood Zone 3a, protected by raised flood defences and the Thames Barrier, which significantly reduces the likelihood of flooding. Even in the event of a breach, the residual risk is low, and escape routes remain viable.

#### Exceptions Test

250. NPPF paragraph 169 states that the need for the Exception Test will depend on the vulnerability of the site and of the development proposed. Developments for buildings used for student accommodation in flood zone 3a are required to undertake the exception test. Evidence has been provided in the site-specific flood risk assessment of how the Exception Test has been met.

251. NPPF paragraphs 170-171 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.

252. The applicant has submitted evidence of how both elements of the Exception test have been met.

253. The Flood Risk Assessment for the Bush Road development outlines the following wider sustainability benefits:

- The re-use of suitable brownfield land as part of a local regeneration scheme, site required to meet the shortfall in affordable and market housing in the area; the proposed design can provide good quality housing and a range of social infrastructure.
- An overall reduction in flood risk to the wider community
- The provision of multifunctional Sustainable Drainage Systems that integrate with green infrastructure, significantly exceeding National Planning Policy Framework policy requirements for Sustainable Drainage Systems.

254. The Flood Risk Assessment for Bush Road demonstrates that the proposed development will be safe for its lifetime by including elevated finished floor levels, flood zone compatibility, flood warning and emergency planning, sustainable drainage strategy, safe access and egress and no increase in flood risk elsewhere.

### Sustainable urban drainage

255. The proposed sustainable urban drainage measures would be acceptable and would include 885sqm green roofs, 833sqm pervious pavements and 2,661sqm (catchment area) attenuation tanks.

### Land contamination

256. Our environmental protection team advise that a contamination condition is

necessary to ensure the submission of details of a Phase 2 assessment and remediation.

### Air quality

257. The Air Quality Assessment concludes that air quality impacts would be acceptable, no mitigation would be required for the operational phase, the construction phase impacts can be managed with recommended best practices and that there is no need for mechanical ventilation or further air quality mitigation.

### Light pollution

258. Our environmental protection team advise that an outline lighting scheme is included but this does not include detailed spread plans and given the development is behind existing dwellings it is recommended that permission be subject to an external lighting condition.

### **Energy and sustainability**

259. Policy P70 (Energy) of the Southwark Plan 2022 states that all development must minimise carbon emissions on site in accordance with the energy hierarchy: Be Lean, Be Clean and Be Green.

260. The applicant has submitted an Energy Statement setting out how the three step Energy Hierarchy has been explored and demonstrated good CO<sub>2</sub> savings on-site.

261. Be Lean (Demand Reduction):

- High insulation, airtightness, Mechanical Ventilation with Heat Recovery
- Energy-efficient lighting and controls
- Achieved 21% CO<sub>2</sub> reduction (13.2 tonnes/year).

262. Be Clean (Heating Infrastructure):

- Centralised air source heat pumps for space heating and hot water
- No Combined Heat and Power (not endorsed by GLA)
- No savings attributed here (0%).

263. Be Green (Renewables):

- 324 PV panels (roof-mounted, 282 m<sup>2</sup> total area)
- Air Source Heat Pumps
- Achieved 58% CO<sub>2</sub> reduction (36.3 tonnes/year).

264. The applicant also referred to Be Seen (Monitoring) in a commitment to ongoing energy performance monitoring via GLA platform.

265. In terms of carbon emissions and offsetting the baseline emissions is 62.5 tonnes CO<sub>2</sub>/year and after measures is 13 tonnes CO<sub>2</sub>/year. The total on-site savings is 49.5 tonnes (79%) resulting in a required offset of 13 tonnes which equates to a financial contribution of £37,064 (GLA price £95/tonne).

### Overheating

266. Our environmental protection team advise that the design requires active cooling (air temping) to achieve overheating criteria.

### BREEAM

267. BREEAM Excellent is targeted. This would be secured by condition.

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

268. 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.

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

Planning Obligation	Mitigation	Applicant Position
BNG significant monitoring fee	Secure the biodiversity gain for 30 years. A £12,874.00 monitoring fee to cover the cost of periodic monitoring over 30 years. A Biodiversity Net Gain Plan and Habitat and Management and Monitoring Plan will be required post-approval.	Not agreed
Affordable housing	£3,710,000: in-lieu financial contribution	Agreed
Carbon offset fund	£37,064	Agreed

Highway works (as part of the S278 agreement)	-The vehicle crossover at the proposed pedestrian access to the northwest of the site must be narrowed and the removed part of the crossover returned to a full kerb-height footway	Agreed
	-Resurfacing of footways around the site	Agreed
	-Introduction of new and/or upgraded and resurfaced vehicle crossover	Agreed
	-Bond for value of works, plus a monitoring fee, will be secured by Highways	Agreed
Deliveries and servicing	Delivery and servicing management plan (DSP) bond	Agreed
Parking permits	Development excluded from eligibility for Controlled Parking Zone permits	Agreed
Total financial Contributions	£3,747,064	Agreed
Administration and monitoring fee (excluding affordable housing monitoring fee and servicing bond)	2% of total financial contributions	Agreed

270. In the event that an agreement has not been completed by 8 June 2026, the committee is asked to authorise the director of planning to refuse permission, if appropriate, for the following reason:

In the absence of a signed S106 legal agreement there is no mechanism in

place to 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)**

271. 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. In this instance, the proposal is a CIL chargeable development because it comprises over 100sqm of new build. The site is located within Southwark CIL Zone 2 and MCIL2 Band 2 Zone. Based on the GIA obtained from CIL Form 1 dated 29-Nov-24 and other planning submissions, the gross amount of CIL is £682,366, of which Mayoral CIL £236k and Borough CIL £446k. It should be noted that this is an estimate and subject to change, as floor areas will be measured and checked when related CIL Assumption of Liability is submitted after planning approval has been secured.

## **Community involvement and engagement**

272. Community engagement, including a website and leafletting, has been and continues to be undertaken by the applicant. This is outlined below:

- A website was published on 2 August 2024 and remains active to date. It includes answers to Frequently Asked Questions about the Proposed Development and a form through which locals can give feedback on the proposals. The website received 628 unique visits over the first four weeks following its publication.
- A multi-platform social media campaign which ran from 2 to 26 August 2024. This campaign was targeted at residents in the vicinity of Bush Road, with a broad age range (18-65+). This campaign had a reach of 10,100 people.
- On 5 August 2024, newsletters were posted to 500 homes in the vicinity of the Site. The newsletter explained how residents could provide feedback via the website, or by calling or emailing the company delivering the newsletters.
- In early 2025, the Applicant engaged in extensive door-to-door canvassing, to better understand local attitudes in relation to the Proposed Development.

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

### **Consultation responses from external consultees**

#### **Thames Water**

273. No comments received.

#### **Environment Agency**

274. No objections to this application subject to the inclusion of the provided conditions and informative to any planning permission granted.

#### **London Fire Brigade**

275. No comment.

#### **London Underground/DLR Infrastructure Protection**

276. Has no comment.

#### **Transport for London**

277. The site is located on Bush Road, which forms part of the Strategic Road Network (SRN). TfL has a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact on the SRN. The closest bus stop is directly opposite the site (Bush Road Stop N), which serves route 47, 188, 225 and N1. There is also a bus lane on this section of the carriageway which runs parallel to the site.

#### ***Healthy Streets***

278. Any application must be supported by a full Healthy Streets Transport Assessment (TA) including a day and night-time Active Travel Zone (ATZ) assessment following guidance available on TfL's website. The council should secure funding toward off-site Healthy Streets improvements where necessary, addressing deficiencies identified through the ATZ assessment should be committed by the applicant and agreed.

#### **Car Parking**

279. 'It is welcomed that the proposed development is proposed to be car-free, with the exception of disabled persons' parking, which will be provided at the southern end of the site. As this does not meet the three per cent requirement set out in the London Plan, we would expect a bus stop accessibility audit to be undertaken and necessary mitigation secured. We also encourage Southwark to secure a s106 obligation to cover the costs of providing a disabled persons' parking space including electric vehicle charging, although it would seem unlikely in this case that suitable and convenient provision could be made nearby hence the importance of providing for other modes of travel by disabled

people. To ensure the site remains car-free, TfL would also expect a permit-free agreement on residents other than those with a Blue Badge for the local CPZ. This should be secured through the Section 106 agreement. It is also welcomed that both these spaces will be equipped with active electric vehicle charging points (EVCPs) in line with Policy T6.'

### Cycle Parking

280. 108 long-stay spaces are proposed for the PBSA cycle parking, which meets the minimum quantum set out in the London Plan. 3 short-stay spaces should also be provided. For the commercial aspect, two short-stay and six long-stay spaces should be provided. Whilst the quantum has been met, it should be ensured that these spaces are located as close as possible to the entrance of that space. Policy T6 also requires cycle parking to meet the quality standards in the London Cycling Design Standards (LCDS). Details of non-compliance are as follows:

- For the two-tier racks, a 2.5m gap is required as an absolute minimum in front of the racks, and currently this gap is 1.8m, which must be considered unacceptable. This proposed spacing will make it very difficult for cyclists to use the upper tier.
- No provision for adapted and wider cycles has been provided. Three Sheffield stands, at 1.2m spacing, have been provided in cycle store A and a further three in cycle store B, at 1m spacing. The widths proposed are not suitable to accommodate wider/adapted cycles. To meet LCDS standards, at least five per cent of stands should be Sheffield stands at wider spacing (1.8m). The provision for wider/adapted cycles should be in addition to at least five per cent of stands being Sheffield stands at standard spacing.
- The current plans do not adhere to this, with both stores located externally. Creating a secure cycle store is essential for supporting the development of cycling as a practical transport choice, and thus an external store may not provide adequate personal security for its users. Instead, the applicant should consider moving the long-stay cycle parking in a basement parking area, with a well-lit and well overlooked entrance. We recommend improvements to ensure closer compliance with London Plan Policy T5 and the London Cycle Design Standards (Chapter 8) are secured prior to determination. We do not consider it appropriate for this to be left to condition as design amendments are required.

### Delivery and Servicing

281. The applicant has stated in 'Outline Delivery and Servicing Management Plan' that four service vehicle movements are forecast between 07:00 and 19:00. Based on similar schemes, we consider that this underestimates the number of expected deliveries a day. It should be ensured that sufficient capacity for servicing is provided on-site, and this demonstrated by the applicant. It is understood that delivery and servicing associated with the development will take place on site, with the swept path drawings demonstrating that vehicles can access and egress in a forward gear, in line with the Mayor's Vision Zero approach. It is welcomed that refuse collection will take

place internally, with a bin store provided in each block

#### Construction and Logistics

282. No information regarding construction has been provided. A Construction Logistics Plan should be secured through condition to align with Policy T7. Vehicles should enter and exit the site in forward gear, to align with the Mayor's Vision Zero approach and Policy T2. Safe, comfortable and convenient pedestrian and cyclist movement alongside safe and efficient bus operations should be maintained throughout the construction process to align with Policy T7 K and this demonstrated in the CLP. TfL encourages the use of construction contractors who are registered on the Fleet Operator Recognition Scheme (FORS). Contractor vehicles should include side-bars, blind spot mirrors and detection equipment to reduce the risk and impact of collisions with other road users and pedestrians on the capital's roads. TfL also encourages the developer to adhere to the CLOCS standard. It should also be made clear that the footway and carriageway of Bush Road should not be blocked during the construction phase of the development. Temporary obstructions during the conversion should be kept to a minimum and should not encroach on the clear space needed to provide safe passage for pedestrians or obstruct the flow of traffic on the SRN. All vehicles should only park/stop at permitted locations and within the time periods permitted by existing on-street restrictions.

#### Travel Plan

283. We note that the applicant has provided an interim travel plan. To support achievement of the Mayor's Strategic Mode Shift target outlined in Policy T1 and this car free development, the active travel environment, not only within but beyond the red line boundary, needs to be appealing, safe, and perceived to be safe, during all times of the day. Whilst the surrounding area of this site has excellent public transport connectivity, and good existing active travel infrastructure, to further encourage mode shift and reduce the mode share percentage of car drivers, the applicant needs to demonstrate that appropriate hard and soft measures have been implemented to support sustainable travel (e.g., establishing an oyster card or bike hire subsidy scheme).

#### Student Move In/Out

284. A Student Management Plan (SMP) has been provided by the applicant. It is welcomed that student move in/out will be managed via a booking system, with students allocated time slots and additional waste removal assistance to be provided for moving bulkier items out. However, the location of drop-off points, the duration of un/loading time slots and how time slots will be allocated/managed should be outlined in an updated SMP to confirm that the strategy is suitable. An updated Student Management Plan (SMP) should be secured through condition, addressing the above points.

#### Trip Generation and Impact

285. From the information provided, it is accepted that the impact of this development on the local transport network will be negligible.

## **Metropolitan Police**

286. The Metropolitan Police provided the following written comment: 'After reviewing the Design and Access Statement, I cannot find any reference to security or Secured by Design. Additionally, no contact has been made with the Southeast Designing Out Crime Unit regarding this development at this stage. It is strongly encouraged that the architects and/or development team reach out to the Southeast Designing Out Crime Unit as soon as possible to discuss Secured by Design requirements and standards for this project.

The use of tested and accredited products with certification in the name of the fabricator namely doorsets, windows, glazing, will all be necessary for this development for both the residential and commercial areas. This coincides with the requirements for access control, CCTV, secure perimeter treatments, secure bin stores and cycle stores. I note that the following has been considered;

- Secure cycle storage.
- CCTV
- Access control to the buildings.
- Access control on the lifts within the buildings.'

287. A consultation with the Designing out Crime team would provide an opportunity to discuss the following concerns in relation to the development:

- Public realm, including lighting
- Any undercrofts
- Refuse strategy
- Postal strategy
- Local crime trends
- Compartmentation on each floor where required
- Visitor's strategy.

288. Overall, I feel that the development could achieve the security requirements of Secured by Design. Achieving Secured by Design should be welcomed, especially as it is in a high crime area. Southwark is a high crime borough, suffering from incidents of Burglary, Robbery, Assaults including violent crime and knife crime, Criminal Damage, Motor Vehicle Crime, Theft, gang crime, and Anti-Social Behaviour including drugs. I would ask that both Pre-Commencement and Pre-Occupation conditions are considered to ensure end to end compliance with Secured by Design and are worded;

### **1. SBD Measures.**

The development hereby permitted shall incorporate security measures to minimise the risk of crime and to meet the specific security needs of the development in accordance with the principles and objectives of Secured by Design. Details of these measures shall be submitted to and approved in writing by the local planning authority prior to commencement of the development and shall be implemented in accordance with the approved details prior to occupation.

### **2. 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 by the local planning authority.

289. Where planning conditions to achieve SBD certification exist, we will be on hand to assist all parties involved from concept to completion. Planning Conditions to achieve Secured by Design certification will invariably afford you comfort in the knowledge that all aspects of physical security within any particular development have been considered and approved. Where Secured by design Certification is required to discharge Pre-Occupation Planning Conditions, a physical site inspection will always be carried out by a qualified Designing Out Crime Officer (DOCO) upon completion.

290. The National Planning Policy Framework (NPPF)

291. Section 8 states  
 "Planning policies and decisions should aim to achieve healthy, inclusive and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion...".

292. Section 12 states  
 "Planning policies and decisions should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience."  
 Sometimes local crime trends and geographical location insist that heightened security measures are necessary to achieve SBD, and this is decided upon development, by development.

## **Consultation responses from internal consultees**

### **Local Economy Team**

293. The size and class use wouldn't trigger any obligations from local economy.

### **Urban Forester**

#### Initial comments

294. As per 24/EQ/0150: Scrub habitat has been cleared which included trees. This will need to be considered as part of the UGF or BNG from the 2020 baseline and to inform the landscaping design to mitigate loss. The area either side of the entrance dominated by hard landscaping offers opportunity for planting. Any proposed attenuation tanks need to be shown to ensure sufficient planting is available and unconstrained at grade. The AIA is sufficient to recommend detailed tree protection measures can be conditioned. The proposed use of Amelanchier within the planting schedule should be amended to more drought tolerant species eg Cercis siliquastrum

## Further comments

295. Please see a screen grab from the 2023 ProxiMiTree layer identifying loss of canopy cover. Insufficient mitigation is proposed. This could be addressed via a CAVAT valuation S106 if not able to be provided on site.



296. P61 Trees

1. Development will be permitted if trees are planted as part of landscaping and public realm schemes, commensurate to the scale and type of development, and the character of the neighbourhood.
2. Development must retain and protect significant existing trees including:
3. Development must retain and enhance the borough's trees and canopy cover; and
4. Where trees are removed to facilitate development, they should be replaced by new trees which result in no net loss of amenity, taking into account canopy cover as measured by stem girth; either
  1. Within the development whereby valuation may be calculated using the Capital Asset Value for Amenity Trees (CAVAT) methodology or other assessment; or
  2. If this is not possible, outside the development. In this case a financial contribution must be provided to improve borough tree planting located according to 'right tree right place' principles. The financial contribution will include ongoing maintenance costs where trees are planted in the public realm.

**Ecologist**

### Initial comments

297. Further information required. Habitat degradation has occurred onsite with the removal of scrub habitat which has been recorded in the submitted BNG metric. The statutory metric user guide states that you must:

- Evidence how this habitat type and condition has been determined in the user comments
- Account for the time between the habitat loss and compensation using the 'delay in starting habitat creation or enhancement' function.
- These two elements have not been undertaken.
- There are concerns that the size of some habitat areas including the cleared scrub have been underrepresented within the habitat map. The condition assessments for pre and post development should be provided within the BNG report. Dense ivy has been recorded on building 2. The likelihood of this providing a roosting feature for bats has not been discussed within the ecological assessment.

### Further comments

298. Invasive species described within the ecology assessment should be removed and disposed of following appropriate guidelines.

The ecological assessment specifies precautionary construction measures which include:

- Any trenches or excavations on site should be either covered over at night or a plank of wood placed in so as to allow any mammals to escape if they were to accidentally fall in.
- Any open pipes or conduits laid should be blocked off each night to prevent any small mammals from entering them.
- Disturbances, such as loud noises, vibrations, and floodlighting in association with night work being minimised.

### BNG

The baseline value of habitats has been calculated to be 0.32 habitat units and 0.05 hedgerow units. The onsite measures propose to deliver an increase of 0.46 habitat units to 0.79 which equates to a net percentage gain of 145.02%, and an increase of 0.06 hedgerow units to 0.12 which equates to a net percentage gain of 117.12%.

It is expected that this will be considered a significant gain and it is expected that a s106 will be required to secure this.

In order to satisfy trading rules and meet the statutory requirements of BNG, offsite units or statutory credits are required to be purchased. The biodiversity gain hierarchy should be followed in this instance. It is requested that the applicant advises which option they expect to be undertaking. Note that the application is not considered to meet the requirements to use rule 4 of the statutory metric.

Recommended conditions

AGW10- Bird boxes x 2

Wildlife friendly lighting suggested wording:

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

- a) identify those areas/features that are particularly sensitive for bats and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and
- b) show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places. All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority. Prior to the new development being first brought into use/occupied a bat friendly Lighting Plan shall be submitted to and approved by the Local Planning Authority. Reason: To ensure compliance with the Habitats Regulations and the Wildlife & Countryside Act (1981), (as amended), and because bats are to be active in vicinity of the development site.

Recommended informatics

Nesting birds

### **Design and Conservation Team**

Initial comment:

- 299. Recommendation: Refuse (Massing, height, quality and functionality).
- 300. Policy Context: NPPF Chapters 12. Achieving well-designed places & 16 Conserving and enhancing the historic environment London Plan 2021: D3 Optimising site capacity; D4 Delivering good design; HC1 Heritage conservation and growth. Southwark Plan 2022: P13 Design of places; P14 Design quality; P15 Residential Design; P20 Conservation areas; P21 Conservation of the historic environment and natural heritage; P26 Local list. Heritage SPD 2021 Residential design standards SPD 2015. Other guidance: "The setting of Heritage Assets" (Historic England).
- 301. • Brief description and observations: The Site comprises a triangular backland plot of approx.—0.32 ha. It is bounded by the rear gardens of properties along the east side of Bush Road, the north side of Bestwood Street, and the west side of Lower Road. The primary access to the Site is through two separate routes on Bush Road. The site is currently occupied

by a builders' yard and is cluttered with a mixture of single-storey brick buildings and cabin containers. The site is underused, and its existing buildings are of no architectural quality.

- The site's eastern boundary showcases the houses on the west side of Lower Road. These houses feature stock brick facades, 2-4 storey Victorian terraces, basement floors, arched-headed windows on ground floors, deep window reveals, gated front gardens, generous rear gardens, and brick chimney stacks.
- The building lines and street frontage on this side of Lower Road created a cohesive townscape. The Bush Road properties on the boundary of this backland plot feature Victorian terraces of 2 stories with bay windows closer to the junction of Bush Road and Rotherhithe New Road. Towards the south, closer to the junction of Bush Road and Bestwood Street, housing blocks of 3-4 stories were developed in later years. The edge of Bush Road to the front of these houses features a row of mature trees.
- The attached housing blocks on the Site's southern boundary, on Bestwood Street, have been developed with a setback to provide a generous front garden/formal landscape area. In the centre, these housing blocks form a chamfered shape with a generous setback from Bestwood Street frontage. These houses feature a two-storey, stock brick façade, red brick gauge window heads, flat roofs, brick chimney stacks, and a rear garden amenity. In summary, the Site's boundaries are defined by fine urban grain due to unified and smaller building plots (and smaller scale 2 - to 4-storey buildings).
- The site and its neighbouring properties are situated on a prominent island connecting Rotherhithe New Road to Deptford and Evelyn Road to the south. The Site is not in a conservation area and does not include any statutory or locally listed buildings. However, some locally listed buildings are located near the Site:
  - 226-244 Lower Road
  - 214 Lower Road (Farrier's Arms PH)
  - 198 Lower Road
  - Sutton Dwellings on Chilton Grove.

#### Relevant Planning History:

302. • 24/EQ/0211—Pre-application advice is sought for the demolition of existing buildings and the redevelopment of the Site to deliver a part two, part three, and part four-storey development comprising purpose-built student accommodation (122 rooms), ancillary uses, and landscaping. D&C raised objections due to massing, height, form, and quality of accommodation.

• 24/EQ/0150 - Pre-application enquiry for the demolition of existing buildings and the development of the site to deliver a part two, part three and part four storey development comprising purpose built student accommodation (122 rooms) (Use Class Sui Generis), ancillary uses and landscaping.

Objections were raised by D&C due to height, form, massing and quality of residential accommodation.

- 24/EQ/0002 - Pre-application advice is sought for the demolition of the existing buildings and redevelop the Site to deliver a part one, part three and part four-storey development comprising purpose-built student accommodation (101 rooms) (Use Class Sui Generis), ancillary uses and landscaping - no objection raised by D&C.
- 19/AP/2544 - Demolition of all existing buildings; construction of 2no. Three-storey blocks and 2no. Part three and part four-storey blocks containing 36no. Self-contained flats comprising 15no. One-bedroom units, 14no. Two bedroom units and 7no. Three-bedroom units; closure of northern access from Bush Road; and provision of associated landscaping, parking and turning areas - REFUSED on Policy P1 (social rented and immediate housing) and P2 (new family homes). D&C raised no objections.

Detailed comments:

303. This consultation response should be read along with the previous Pre-Application letter (24/EQ/0211)

Principle

304. The proposal would not result in the demolition of any locally or statutory listed buildings or involve demolition in a conservation area. There are no objections to the principle of demolition in terms of design and conservation.

Heritage, Townscape and Urban Design

305.

- The Residential Design Standard SPD specifies that 'backland development, particularly for new residential units, can significantly impact amenity, neighbouring properties and the character of an area'. It mentions that 'development must not be more intensive than the existing development on the adjoining street frontage'.
- In addition, backland developments should echo the characteristics of the existing neighbours. Regarding heritage impact, the submitted DAS has provided a number of close-range views from Lower Road (opposite the locally listed buildings) and Bush Road. These views appear to be unverified. There is doubt about the accuracy of the visual impact analysis. It is recommended that a Vu.City model of the proposed development to be shared with the officers.
- In addition, cross-section plans on the street from Lower Road be provided. In terms of townscape, the site is a triangular shape, bounded by low-rise and architecturally characteristic buildings and cohesive street frontage on all three sides. The urban grain of this immediate vicinity is of fine grain due to smaller building plots.
- The proposed massing does not respond positively to its immediate

townscape. When seen from views to the (immediate) south, the proposed massing appears disruptive and does not respond to the cohesive design and street frontage (of the northern side) of Bestwood Street. Proposed Block A will appear to have an overbearing quality from the views opposite Nos. 6-48 Bestwood Street.

- The DAS and the submitted information do not include any tested townscape views from the south. There are concerns regarding these views; when seen along Thrundley's Road views, the proposed setback on Block A will not sufficiently mitigate the visual impact. 24/EQ/0002 and 19/AP/2544 have set out the maximum feasible massing for the site. The current proposal appears bulkier compared to 19/AP/2544.
- The introduction of a setback storey will not sufficiently mitigate the visual impact, particularly when experienced from southern views. It is important that back-land development is not more intensive than the existing development on the street frontage in order to maintain a rational street hierarchy.
- The proposed development is too intense and does not maintain a rational street hierarchy. The proposed massing is bulky, and the building footprints do not respond well to the existing urban grain. The proposed development does not comply with the criteria set in Policies P13 and P14 of the Local Plan (2022). The proposed development will be gated and secured. As a backland Site, there is potential for community cohesion.
- The current development does not introduce any opportunities for the wider community or the neighbouring properties. Concerns exist about the proposed development's impact on amenities (such as a sense of enclosure and overshadowing). Matters regarding amenities are deferred to the DM Officer. Concerns exist about the distance of the service entrance to the commercial block (Block C). Detailed comments regarding servicing, cycle storage, and transport are deferred to the transport officer.

#### Architecture, layout and quality of accommodation

306. • The proposed materials appear contextual. The use of pre-cast stone is encouraged/supported. The proposed window reveals, and stepped brickwork shown on the edge of blocks are supported. If minded to approve, a sample of materials should be secured by way of condition.

• In addition, the size of the reveals should be decent and sufficient. If minded approving, the size of the window reveals should be secured by way of condition. Overall, the materials and the articulation of the façade are supported. However, it is recommended that the commercial block (Block C) revise the material for its upper floor.

• The proposed material for the upper storey of this block should be ribbed metalwork or detailed panels in black colour, which will make this block more readable. If minded approving, this point should be secured by way of condition.

- In addition, the proposed façade needs to have pop-out windows and feature a not-flush elevational/façade design. Regarding the commercial block (Block C), officers question the location of the plant and bin storage to the south of the block. These southern spaces have outward openings fronting the proposed pedestrian route. In addition, there is a question regarding the extent and (the required) facility for air handling in this block. It is recommended that the ground floor ceiling height be 3.5m - 4 m.
- Officers also question the provision of 1 WC for each floor of Block C. It is recommended that the internal arrangement of this block be revised (e.g., the proposed plants and bins should move to the north of this block). Regarding the arrangement of PBSA blocks, the communal spaces on the ground floor should provide a ceiling height of 3.5-4 m (particularly the foyer on the ground floor of Block A). If minded approving, the ceiling height should be noted. Block B does not provide any communal spaces.
- It is recommended that this block offer an internal communal space for the students. It is acknowledged that due to the Site's location, there are challenges regarding the height difference on the ground floor. It is understood that this difference is also due to the Site being in Flood Zone 3. Subject to detailed comments from the EA Officer and the DM Officer, it is suggested that the possibility of excavating the Site be investigated. This would enable the removal of the step-up on the proposed ground floor and provide an opportunity for a better height throughout the Site. In line with the previous comments in pre-app 24/EQ/0211, significant concerns remain regarding the quality of the proposed studios.
- The proposed 17 sqm for the smallest student studios is still lower than our minimum recommended size of 18 sqm. Concerns exist regarding the quality of outdoor communal amenity spaces provided within the proposed development. Officers repeatedly ask for a better-quality outdoor amenity space (see the previous comments on 24/EQ/0211). Matters regarding the outdoor amenity are deferred to the DM Officer.

307. Conclusion:

The proposed development is unacceptable in terms of form, bulk, height and mass, and it does not respond to the townscape or provide a functional quality of architecture. Reasons for Refusal: The proposed development contradicts Policies P13 and P14 of the Local Plan (2022). The proposed development is contrary to the Residential Standards SPD.

**Design Team further comments June 2025:**

308. The proposed scheme does not seem to be overly dominant or harmful in townscape terms. There is a setback on the upper floor which helps in terms of providing visual mitigation. Overall, it is acceptable.

**Archaeologist**

309. No comment.

### **CIL & S106 Team**

310. The proposal is a CIL chargeable development because it comprises over 100sqm of new build. The site is located within Southwark CIL Zone 2 and MCIL2 Band 2 Zone. Based on the GIA obtained from CIL Form 1 dated 29-Nov-24 and other planning submissions, the gross amount of CIL is £682,366, of which Mayoral CIL £236k and Borough CIL £446k. It should be noted that this is an estimate and subject to change, as floor areas will be measured and checked when related CIL Assumption of Liability is submitted after planning approval has been secured.

### **Flood Risk Team**

311. The outstanding matters reassessed were as follows:

312. MORE INFORMATION REQUIRED – The proposed runoff rates are not supported within the calculations. Calculations indicate a max outflow of 2.7 l/s. The applicant is required to update the calculations to reflect the proposed runoff rate of 2.5l/s.

313. MORE INFORMATION REQUIRED – The application has not used the latest rainfall data (FEH22) within the calculations and the application does not include the full site area within the calculations.

314. FAIL – the drainage strategy does not contain the maintenance tasks and frequencies for each drainage component proposed.

315. The application has changed in the following way:  
The applicant has provided further calculations showing that the maximum discharge rate is 2.5 l/s, and that the parameters used in the calculations are the FEH22 parameters. Maintenance tasks and frequencies have not been provided for all drainage features, however this is suitable to be conditioned.

316. We recommend approval of the application with the addition of conditions in relation to details of Drainage Strategy and details of Drainage Strategy – Verification Report as the applicant has sufficiently addressed the outstanding matters.

### **Waste Management Team**

317. Questioned whether we know if the collection distances will be in line with our guidance notes, is food waste being provisioned here and are there dropped kerbs outside the bin stores?

### **Highways Team**

318. If consent is granted the developer must enter into a S278 agreement to complete the following works:

- Reinstate the redundant northern vehicle crossover as footway.
- Reconstruct the southern vehicle crossover to current Southwark

Streetscape Design Manual (SSDM) standards

- Repair any damages to the highway within the vicinity of the development as a result of construction activities including movement of construction vehicles.

319. General Comments

- The northern vehicle access route is proposed to be used by pedestrians and cyclist. In view of this, the existing vehicle crossover at this location would become redundant and must be reinstated as footway.
- The vehicle tracking movements using a refuse vehicle appears to be tight and a vehicle driver will struggle to make that manoeuvre (particularly when two the disabled parking spaces are occupied) and exit the site in forward gear. Applicant should review building footprint to ensure that there is adequate turning space for the largest expected vehicle visiting the site.

320. Drainage

The applicant is to note that surface water from private areas is not permitted to flow onto public highway in accordance with Section 163 of the Highways Act 1980. Detailed drawings should be submitted as part of the s278 application confirming this requirement.

321. Pre commencement condition survey

Prior to works commencing on site (including any demolition) a joint condition survey should be arranged with Southwark Highway Development Team to catalogue condition of streets and drainage gullies. Please contact the team via [highwaysdm@southwark.gov.uk](mailto:highwaysdm@southwark.gov.uk).

322. Notes: The following should be noted. The Highway Authority requires works to all existing and any proposed new streets and spaces (given for adoption or not) to be designed and constructed to adoptable standards. Southwark Council's published adoptable standards as Highway Authority are contained in the Southwark Streetscape Design Manual (SSDM), [www.southwark.gov.uk/ssdm](http://www.southwark.gov.uk/ssdm).

Applicants will be required to enter into a s278 agreement under the Highways Act 1980 for any works to existing adopted Highways.

**Transport Team**

Initial comments:

323. General Comments

1. The site is in a PTAL 5.
2. Bush Road is a classified road, A200.
3. The site is within a CPZ, South Rotherhithe (N) operating between the hours of 08:00 - 18:30, Mon - Fri.
4. The site has 2 no. existing vehicle accesses on Bush Road.
5. There is a bus stop (N) on Bush Road, across from the site.
6. There is a street lighting column within the public highway to the frontage of the property.

7. Bush Road is a one-way street.

#### Cycle Parking – PBSA

- 324. The applicant has proposed 108 long stay spaces and 10 short stay spaces. This accords to Southwark Plan Policy P53 and London Plan Policy T5, however the design of the cycle store does not accord to LCDS Chapter 8. The applicant must submit amended cycle store plans prior to determination – please find detailed requirements below. Note that these requirements were clearly laid out a pre-app stage.
- 325. The applicant has proposed 96 two-tier rack spaces and only 12 Sheffield stand spaces. The 6 adapted cycle spaces are not suitable for larger cycles. As per LCDS Chapter 8, a maximum of 75% of all cycle parking spaces (81 spaces) can be within two-tier racks. A minimum of 20% of the total long-stay cycle parking spaces (21 spaces) must be in Sheffield stand form with a minimum of 1200mm clear space between stands, or 600mm clear space to one side. 5% of cycle parking spaces (6 spaces) must be designed to accommodate disabled, adapted and cargo bicycles with at least 1800mm clear space between stands, or 900mm clear space to one side.
- 326. The proposed two-tier racks have 1800mm clear space to the front. This does not accord to LCDS, which requires 2500mm minimum clear space in front of two-tier racks for accessibility. The applicant has not demonstrated a minimum floor to ceiling height of 2.6 metres where two-tier racks are provided.
- 327. The applicant has provided visitor cycle parking within the red line boundary of the site; however, the Sheffield stands appear very close to the door of Block A. When these stands are occupied, the door could be obstructed by bicycles. The stands should be spaced to allow enough space to open/close the door.
- 328. Provision of a bike maintenance stand and fixed pump will be seen positively in terms of quality of cycle parking provision and Travel Plan objectives.
- 329. Compliance Condition: To be secured with a compliance condition. This means that Transport Policy will need to agree detailed cycle store plans prior to determination. Reason: London Plan Policy T5, Southwark Plan Policy P53, London Cycle Design Standards Chapter 8, DfT LTN/120, Southwark Air Quality Action Plan Action 7.8, Streets for People objectives 3, 5 and 8.

#### Cycle Parking – Commercial

- 330. The applicant has proposed 2 short stay cycle parking spaces for flexible Class E space (318sqm GIA), although only 1 side of the Sheffield stand appears usable. This does not accord to adopted policy, as the worst-case scenario must be applied for long-stay and short-stay requirements. In this case, the worst-case scenario is non-food retail for long-stay (1 space per 100sqm) and food retail for short-stay (1 space per 20sqm). This amounts to 4 long-stay spaces and 16 short-stay spaces.
- 331. The applicant must provide commercial long-stay cycle parking for staff. Commercial and PBSA long-stay cycle parking must be accommodated in

separate cycle stores.

332. Compliance Condition: To be secured with a compliance condition. This means that Transport Policy will need to agree detailed cycle store plans prior to determination.

Reason: London Plan Policy T5, Southwark Plan Policy P53, London Cycle Design Standards Chapter 8, DfT LTN/120, Southwark Air Quality Action Plan Action 7.8, Streets for People objectives 3, 5 and 8.

#### Cycle Hire Expansion Contribution

333. In accordance with Southwark Plan 2022 Policy P53, which promotes sustainable transport choices, there should be an expansion to cycle hire due to the size and scale of this proposal. TfL may request a financial contribution – please refer to their comments.

334. Reason: Southwark Plan Policy P53, Southwark Air Quality Action Plan Action 7.8 and Streets for People objective 5.

#### Blue Badge Parking Space

335. The applicant has proposed 2 Blue Badge Bays within the red-line boundary of the site. Given the very constrained nature of this site, and the need for on-site delivery and servicing, the applicant should remove Blue Badge Bays from the proposal and provide 2 delivery and servicing bays on site.

#### Car Parking

336. As the site is in PTAL 5, the proposed development must be car-free. The applicant must clarify how the vehicle gate will be managed to prevent private vehicles from entering the site or parking within the turning area.

337. Reason: London Plan Policy T6, Southwark Plan Policy P54, Southwark Air Quality Action Plan Action 7.5 and Streets for People objectives 1 and 3.

#### Car Club

338. As this site has excellent public transport accessibility, and we aim to encourage sustainable transport among students, we do not feel a Car Club bay, vehicle or membership is necessary.

#### Delivery and Servicing

339. The applicant has provided vehicle tracking for a refuse vehicle and fire tender; however, these drawings are not clear and do not demonstrate safe ingress or egress. Please submit updated tracking for review, prior to determination.

340. A delivery and servicing management plan (DSP) bond will be retained for Major developments and a fee taken for the purposes of monitoring whether or not this is accorded to. Both elements will be secured within the s106 agreement.

341. Reason: London Plan T7, Southwark Plan Policy P50, Southwark Air Quality Action Plan Action 4.2 and Streets for People objectives 9 and 11.

Trip Generation

342. The applicant has estimated that the PBSA development will generate 4 total delivery and servicing trips per day. This is significantly lower than we would expect; the applicant needs to review this figure. Student developments will generally have less consolidation of deliveries than standard residential.

343. The applicant must also provide trip generation data for delivery and servicing of the commercial development.

344. We have reviewed the trip generation exercise for users of the site and do not expect this development to have negative impacts on the transport network.

Vehicle Access/Crossover

345. The vehicle crossover at the proposed pedestrian access to the northwest of the site must be narrowed as part of the S278 agreement.

346. Reason: Southwark Plan Policy P50 and P51, Manual for Streets and Southwark's DS.114 and DS.132, Streets for People objective 4 and Air Quality Action Plan (Action 7.5).

347. The Highway Authority has the power to take decisions on where vehicle crossovers and new accesses can and cannot be introduced to the public highway on classified as well as residential, non-classified roads taking into account highway safety, through The Highways Act 1980 and s184 of the act.

Refuse/Recycling

348. The proposed refuse and recycling arrangements do not accord to Southwark's Waste Management Guidance Notes as the drag distance to the back edge of the public highways is greater than 10m. PBSA refuse stores must accord to residential standards to ensure that developments can continue to be serviced in the event of a change of use.

349. Bulky waste storage areas should also be considered.

350. Compliance Condition: To be secured with a compliance condition. This means that Transport Policy will need to agree detailed refuse/recycling store plans prior to determination. Reason: Waste Management Guidance Notes and Waste Management Strategy Extension 2022 – 2025.

Gradients & Site Levels

351. The applicant must submit detailed plans of any ramps with gradient, rise and length clearly marked at pre-app stage. As per Southwark Plan Policy P55 and London Plan Policy T6.1 H(5), gradients must be shown across vehicle, pedestrian and cyclists access routes around the site. The applicant must look at the BS 8300:1 advice on length of footpaths and gradients.

- 352. Spot levels must be provided for any area of the site (whether part of a building, open space or vehicular access) at any floor level that the building will access the public highway from –this is to ensure that the interface with the public highway does not require any changes to the existing level of the public highway.
- 353. Wheelchair users in particular will need to be considered in detail in terms of access to the front door of the block from the back edge of the public highway; and also their passage through internal areas of buildings, to/from Blue Badge Bays which must be provided as level as possible 1:1, and routes to/from larger disabled / adapted cycling parking spaces must also be considered in detail in terms of gradients.
- 354. Reason: BS 8300:1 section 8.1.4 for gradients of pedestrian / wheelchair access routes, London Plan Policy T6.1 H(5) and Southwark Plan Policy P55.

#### CEMP

- 355. The applicant has submitted a framework D/CEMP. The D/CEMP will be conditioned.  
Due to the sensitive location and size of the scheme, penalties will be meted out to transport operators not complying with the routeing of construction vehicles and delivery slots. Reason: Southwark Plan Policy P50, Streets for People objective 10 and Southwark Air Quality Action Plan Action Actions 2.1, 2.2, 2.5 and 2.7.

#### Pedestrian Access

- 356. The proposed pedestrian access to the north of the site accords to adopted policy. The redundant vehicle crossover at the proposed pedestrian access must be removed and returned to a full kerb-height footway as part of a S278 agreement.
- 357. The applicant must provide a 1.2m wide, power assisted gate at this access to ensure use is restricted to pedestrians and wheelchair users only.
- 358. Reason: Southwark Plan Policy P50, Southwark Plan Policy P51, Streets for People objective 4, Southwark Council Delivery Plan, Southwark Walking Plan objectives 1 and 2.

#### Parking Permits

- 359. As per Southwark Plan Policy P54, on-street parking permits will not be available for residents, students or businesses in current or future CPZs.
- 360. Reason: London Plan Policy T6, Southwark Plan Policy P54, Southwark Air Quality Action Plan Action 7.5 and Streets for People objectives 1 and 3.

#### Move-in/Move-out Strategy

- 361. The applicant has submitted a Student Management Plan detailing how move-

in and move-out periods will be managed. Transport Policy have no further comment on this.

362. The move-in/move-out strategy will be secured by condition.

#### Travel Plan

363. The applicant has submitted a framework travel plan with a target of increasing active travel by five percent. The applicant must confirm in their travel plan that this increase in active travel comes from public transport use.

364. When the development reaches 50% occupancy, the applicant must submit a full Travel Plan which includes a baseline mode share survey and mode share targets for a 5-year period.

365. Time will be clocked from the date of the baseline survey onwards – at the end of the 1st, 3rd and 5th year of operation of the approved Travel Plan, the applicant must submit a detailed survey showing the methods of transport used by all those users of the building to and from the site and how this compares with the proposed measures. The applicant must also outline any additional measures to be taken to encourage the use of walking and cycling to the site.

366. Travel Plan to be conditioned (4-part condition). Reason: Southwark Plan 2022 Policies P49, P50, P51, P53 and P54, Streets for People objectives 1, 5, 6 and 11, London Plan 2021 Policies T4 and T6.2, Air Quality Action Plan themes 3, 7 and 8 and action 3.9, Southwark Council Delivery Plan.

#### S278

367. A Section 278 Agreement will be required for works to the public highway, as per the details which will be set out by Highways. Please refer to Highways comments on this element. Suggested scope from Transport Planning as follows:

368. • Resurfacing of footways around the site  
 • Removal of redundant vehicle crossovers and restoration to full-height kerb footway  
 • Introduction of new and/or upgraded and resurfaced vehicle crossover  
 • Bond for value of works, plus a monitoring fee, will be secured by Highways

#### S106

369. • Cycle Hire Expansion Contribution (TfL to provide quote)  
 • Delivery and Servicing Management Plan Bond and Monitoring Fee  
 • Revocation of Parking Permits for all proposed properties and units

#### Compliance Conditions

370. • Cycle Parking (pre-determination approval required to ensure this can be provided to at least minimum policy and guidance requirements)  
 • PBSA refuse/recycling (pre-determination approval required to ensure

arrangements comply with Southwark's Waste Management requirements)

## Conditions

371. • D/CEMP  
 • Move-in/move-out strategy  
 • Required Detailed Drawings  
 • Delivery and servicing bays (2 no.)  
 • Detailed Gradient and Spot Levels drawings including details of any ramps with spot levels, gradient, length and landings clearly labelled including at the interface with the public highway  
 • Detailed drawing of cycle store with dimensions of store, stand type(s), aisle widths and distance between stands clearly labelled  
 • Tracking Drawings; for all areas to be accessible by delivery and servicing vehicles, including refuse collection vehicles, and fire tenders.

Further comments:

372. Cycle Parking

No further comment on the long-stay cycle store.

Please provide a dimensioned plan showing the distance between short stay Sheffield stands and the clear space to the side of the stands (commercial and PBSA).

373. Refuse & Recycling

The drag distance for the PBSA waste for bin stores 2 and 3 is over 10m on the proposed plan. It is unlikely that Waste will agree to these arrangements.

The applicant must demonstrate that PBSA waste can be collected within 10m of the refuse vehicle stopped in the turning head.

Commercial refuse will be managed privately.

Further comments

374. The applicant has demonstrated that the site can accommodate delivery and servicing vehicles (predicted 12 two-way trips per day) with one servicing bay. While daily delivery/servicing trips will most likely exceed 12, the excess trips are likely to be undertaken on mopeds (i.e. for Deliveroo), and the site has space to accommodate these.

375. A condition would be fine for the gate.

## Community impact and equalities assessment

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

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

378. 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.

379. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.

380. The Equalities Impact Assessment (EQIA) Assesses how the proposed development addresses needs of people with protected characteristics and socio-economic disadvantages.

381. The Equalities Impact Assessment states that no adverse impacts have been identified for protected groups.

382. The proposal would have positive impacts on students (generally aged 18–24 years old) as high-quality student accommodation and communal spaces would reduce isolation. The Affordable Housing Contribution would benefit lower-income and disadvantaged groups. 10.4% of rooms (11 units) would be fully wheelchair accessible and disabled parking and accessible pedestrian routes would be provided. The proposal would improve safety as it has been designing on Design Out Crime principles and secure by Design standards. The proposal would include CCTV and a 24-hour staff presence.

383. Protected characteristics would be addressed. In terms of age, the proposal would benefit young adults and older residents through improved amenities. In terms of disability, the proposal would include accessible rooms and public realm improvements. In terms of gender reassignment and sexual orientation the proposal would include safety measures and inclusive design. In terms of

pregnancy/maternity the communal spaces would reduce isolation. In terms of race, the affordable housing contribution would support BAME groups disproportionately affected by poverty. In terms of religion the site would be in proximity and provide access to places of worship. In terms of sex the design would mitigate risks of gender-based violence.

## Human rights implications

- 384. 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.
- 385. This application has the legitimate aim of developing this brownfield site. 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

- 386. 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.
- 387. 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.

## 388. 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

389. The proposed development would benefit local businesses via student population expenditure. Social benefits include an Affordable housing contribution and the provision of accessible routes and student rooms. Wider sustainability benefits include the re-use of suitable brownfield land as part of a local regeneration scheme, a payment in-lieu of affordable housing on site, the provision of good quality student housing, an overall reduction in flood risk to the wider community and the provision of multifunctional Sustainable Drainage Systems that integrate with green infrastructure. Urban greening, biodiversity gain and reduced industrial noise and /pollution are also welcomed. It is therefore recommended that planning permission be granted, subject to conditions and the timely completion of a S106 Agreement.

## 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: <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>

## APPENDICES

No.	Title
Appendix 1	Recommendation (draft decision notice)
Appendix 2	Relevant planning policy
Appendix 3	Planning history of the site and nearby sites
Appendix 4	Consultation undertaken
Appendix 5	Consultation responses received

## AUDIT TRAIL

<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>	25 November 2025	
<b>Key Decision</b>	No	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>		
Officer Title	Comments Sought	Comments included
Strategic Director, Resources	No	No
Strategic Director, Environment, Sustainability and Leisure	No	No
Strategic Director, Housing	No	No
<b>Date final report sent to Constitutional Team</b>		26 November 2025

## APPENDIX 1

### Recommendation (draft decision notice)

#### Draft of Decision Notice

planning permission is GRANTED for the following development:

Demolition of all existing buildings and construction of 3no. blocks with heights of two, three, and part-four storeys, containing commercial space (Use Class E(g)(i) / E(g)(iii)), purpose-built student accommodation rooms (Use Class Sui Generis), associated landscaping, parking and turning areas.

Land Rear 19-49 Bush Road London Southwark SE8 5AP

#### CONDITIONS

1. In accordance with application received on 5 December 2024 and Applicant's Drawing Nos.:

Reference no. / Plan/document name / Revision:	Received on:
23124-HCD-ZZ-ZZ-DR-A-PL980 P01 Site location plan	21.11.2025
A-PL907 P04 Plans - Proposed	28.10.2025
A-PL979 P01 Plans - Proposed	28.10.2025
L052-PL-02 REV P4 Plans - Proposed	28.08.2025
L052-PL-04 REV P4 Plans - Proposed	28.08.2025
L052-PL-01 REV P4 Plans - Proposed	27.08.2025
L052-PL-03 REV P4 Plans - Proposed	27.08.2025
L052-PL-05 REV P4 Plans - Proposed	27.08.2025
23124-HCD-AZ-00-DR-A-PL976 REV P09 Plans - Proposed	27.08.2025
23124-HCD-AZ-00-DR-A-PL977 REV P09 Plans - Proposed	27.08.2025
23124-HCD-AZ-00-DR-A-PL978 REV P01 Plans - Proposed	27.08.2025
23124-HCD-AZ-EE-DR-A-PL510 REV P09 Plans - Proposed	27.08.2025
23124-HCD-AZ-EE-DR-A-PL511 REV P08 Plans - Proposed	27.08.2025
23124-HCD-AZ-EE-DR-A-PL512 REV P08 Plans - Proposed	27.08.2025
23124-HCD-AZ-SS-DR-A-PL514 REV P08 Plans -	27.08.2025

Proposed	27.08.2025
23124-HCD-AZ-SS-DR-A-PL515 REV P08 Plans – Proposed	27.08.2025
23124-HCD-AZ-SS-DR-A-PL516 REV P08 Plans - Proposed	27.08.2025
23124-HCD-BZ-EE-DR-A-PL521 REV P09 Plans - Proposed	27.08.2025
23124-HCD-BZ-SS-DR-A-PL520 REV P10 Plans - Proposed	27.08.2025
Reference no. / Plan/document name / Revision:	Received on: 27.08.2025
23124-HCD-BZ-SS-DR-A-PL620 REV P07 Plans - Proposed	27.08.2025
23124-HCD-CZ-EE-DR-A-PL530 REV P08 Plans - Proposed	27.08.2025
23124-HCD-CZ-EE-DR-A-PL531 REV P09 Plans - Proposed	27.08.2025
23124-HCD-CZ-SS-DR-A-PL630 REV P07 Plans - Proposed	27.08.2025
23124-HCD-CZ-SS-DR-A-PL635 REV P06 Plans - Proposed	27.08.2025
23124-HCD-ZZ-00-DR-A-PL400 REV P13 Plans - Proposed	27.08.2025
23124-HCD-ZZ-01-DR-A-PL401 REV P11 Plans - Proposed	27.08.2025
23124-HCD-ZZ-02-DR-A-PL402 REV P11 Plans - Proposed	27.08.2025
23124-HCD-ZZ-03-DR-A-PL403 REV P09 Plans - Proposed	27.08.2025
23124-HCD-ZZ-SS-DR-A-PL637 REV P06 Plans - Reference no. / Plan/document name / Revision: Proposed	Received on: 27.08.2025
23124-HCD-ZZ-SS-DR-A-PL638 REV P05 Plans - Proposed	

	27.08.2025
23124-HCD-ZZ-XX-DR-A-PL640 REV P04 Plans - Proposed	27.08.2025
23124-HCD-ZZ-ZZ-DR-A-PL404 REV P08 Plans - Proposed	27.08.2025
23124-HCD-ZZ-ZZ-DR-A-PL513 REV P09 Plans - Proposed	27.08.2025
23124-HCD-ZZ-ZZ-DR-A-PL902 REV P10 Plans - Proposed	27.08.2025
23124-HCD-ZZ-ZZ-DR-A-PL906 REV P08 Plans - Proposed	27.08.2025
23124-HCD-ZZ-ZZ-DR-A-PL975 REV P09 Plans - Proposed	27.08.2025

Reason:

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

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. Site Contamination

a) Prior to the commencement of development works, an intrusive site investigation and associated risk assessment shall be completed to fully characterise the nature and extent of any contamination of soils and ground water on the site.

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

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

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

**Reason**

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other off-site receptors in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P64 (Contaminated land and hazardous substances), and the National Planning Policy Framework 2021.

**4. Drainage Strategy - Details**

No works (excluding demolition and site clearance) shall commence until full details of the proposed surface water drainage system incorporating Sustainable Drainage Systems (SuDS) have been submitted to and approved in writing by the Local Planning Authority, including detailed design, size and location of green roofs, permeable paving, and attenuation units and details of flow control measures. The strategy should achieve the proposed runoff rate of 2.5 l/s, as detailed in the Flood Risk Assessment and Drainage Strategy (dated November 2024) prepared by DHA Planning. The applicant should demonstrate that infiltration testing has been carried out to determine the capacity for infiltration on site. 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. The applicant must provide a maintenance strategy for the proposed drainage features.

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).

**5. Temporary fencing, hoarding and/or enclosure**

No development shall commence until details of a scheme for temporary fencing, hoarding and/or enclosure have been submitted to and approved in writing by the Local Planning Authority. Any fencing, hoarding and/or enclosure shall be erected in accordance with the approved details and therefore shall be retained for the duration of the demolition and construction works.

Reason: To ensure that the impacts during the construction on occupiers of

neighbouring properties in terms of pollution and nuisance are minimised and in the interest of the visual amenity, in accordance with the National Planning Policy Framework (2024); Policy P56 (Protection of amenity) of the Southwark Plan (2022).

## 6. Construction Environmental Management Plan (CEMP)

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 detailed specification of demolition and construction works at each phase of development including consideration of all environmental impacts and the identified remedial measures;
- Site perimeter continuous automated noise, dust and vibration monitoring;
- Engineering measures to eliminate or mitigate identified environmental impacts e.g. hoarding height and density, acoustic screening, sound insulation, dust control measures, emission reduction measures, location of specific activities on site, etc.;
- Arrangements for a direct and responsive site management contact for nearby occupiers during demolition and/or construction (signage on hoardings, newsletters, residents liaison meetings, etc.);
- A commitment to adopt and implement of the ICE Demolition Protocol and Considerate Contractor Scheme; Site traffic - Routing of in-bound and outbound site traffic, one-way site traffic arrangements on site, location of lay off areas, etc.;
- Site waste Management - Accurate waste stream identification, separation, storage, registered waste carriers for transportation and disposal at appropriate destinations; and
- A commitment that all NRMM equipment (37 kW and 560 kW) shall be registered on the NRMM register and meets the standard as stipulated by the Mayor of London.

To follow current best construction practice, including the following:

- Southwark Council's Technical Guide for Demolition & Construction at <https://www.southwark.gov.uk/construction>;
- Section 61 of Control of Pollution Act 1974;
- The London Mayors Supplementary Planning Guidance 'The Control of Dust and Emissions During Construction and Demolition';
- The Institute of Air Quality Management's 'Guidance on the Assessment of

'Dust from Demolition and Construction' and 'Guidance on Air Quality Monitoring in the Vicinity of Demolition and Construction Sites';

- BS 5228-1:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites. Noise';
- BS 5228-2:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites. Vibration';
- BS 7385-2:1993 Evaluation and measurement for vibration in buildings. Guide to damage levels from ground-borne vibration;
- BS 6472-1:2008 'Guide to evaluation of human exposure to vibration in buildings - vibration sources other than blasting; and
- Relevant Stage emission standards to comply with Non-Road Mobile Machinery (Emission of Gaseous and Particulate Pollutants) Regulations 1999 as amended & NRMM London emission standards (<https://nrmm.london>).

All demolition and construction work shall be undertaken in strict accordance with the approved CEMP and other relevant codes of practice, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure that occupiers of neighbouring premises and the wider environment do not suffer a loss of amenity by reason of pollution and nuisance, in accordance with the National Planning Policy Framework (2024); Policy P50 (Highway impacts), Policy P56 (Protection of amenity), Policy P62 (Reducing waste), Policy P64 (Contaminated land and hazardous substances), Policy P65 (Improving air quality) and Policy P66 (Reducing noise pollution and enhancing soundscapes) of the Southwark Plan (2022).

### **Permission is subject to the following Grade Condition(s)**

#### **7. Secure By Design Measures**

The development hereby permitted shall incorporate security measures to minimise the risk of crime and to meet the specific security needs of the development in accordance with the principles and objectives of Secured by Design. Details of these measures shall be submitted to and approved in writing by the local planning authority before any above grade work hereby authorised begins and shall be implemented in accordance with the approved details prior to occupation.

Reason:

In pursuance of the Local Planning Authority's duty under Section 17 of the Crime and Disorder Act (1998) to consider crime and disorder implications in exercising its planning functions and to improve community safety and crime prevention, in accordance with the National Planning Policy Framework (2024); Policy D11 (Safety Security and Resilience to Emergency) of the London Plan (2021); and Policy P16 (Designing out Crime) of the Southwark Plan (2022).

#### **8. Materials schedule**

Before any façade works hereby authorised begins:

Sample panels of facing materials and surface finishes for the elevations within each building, each to be at least 1 square metre in surface area, shall remain on site for inspection for the duration of the building's construction and be presented on site (or an alternative location agreed with the Local Planning Authority) to and thereafter approved in writing by the Local Planning Authority.

The development shall be carried out in accordance with any such approval given the above.

Reason: In order that the Local Planning Authority may be satisfied that these samples will make an acceptable contextual response in terms of materials to be used, and achieve a quality of design and detailing, are suitable in context and consistent with the consented scheme in accordance with 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).

#### 9. Means of enclosure for all site boundaries

Before any above grade work hereby authorised begins, details of the means of enclosure for all site boundaries shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the details approved and all site boundaries shall be retained and maintained in perpetuity.

Reason: In the interests of visual and residential amenity in accordance with the National Planning Policy Framework (2024); Policy D4 (Delivery good design) of the London Plan (2021); Policy P13 (Design of Places), Policy P14 (Design Quality), Policy P15 (Residential Design) and Policy P56 (Protection of amenity) of the Southwark Plan (2022)

#### **Permission is subject to the following Pre-Occupation Condition(s)**

#### 10. HARD AND SOFT LANDSCAPING

Before any above grade work hereby authorised begins, detailed drawings of a hard and soft landscaping scheme showing the treatment of all parts of the site not covered by buildings shall be submitted to and approved in writing by the Local Planning Authority. The site shall be landscaped strictly in accordance with the approved details in the first planting season after completion of the development. Details shall include:

- 1) a scaled plan showing all existing vegetation and landscape features to be retained with proposed trees, hedging, perennial and other plants;
- 2) proposed parking, access, or pathway layouts, materials and edge details;
- 3) location, type and materials to be used for hard landscaping including specifications, where applicable for:

- a) permeable paving
- b) tree pit design
- c) underground modular systems
- d) sustainable urban drainage integration
- e) use within tree Root Protection Areas (RPAs);
- 4) typical cross sections;
- 5) a schedule detailing sizes and numbers/densities of all proposed trees/plants;
- 6) specifications for operations associated with plant establishment and maintenance that are compliant with best practise; and
- 7) types and dimensions of all boundary treatments.

There shall be no excavation or raising or lowering of levels within the prescribed root protection area of retained trees unless agreed in writing by the Local Planning Authority.

The landscaping shall not be carried out otherwise than in accordance with any such approval given and shall be retained for the duration of the use. Any trees, shrubs, grass or other planting that is found to be dead, dying, severely damaged or diseased within five years of the completion of the building works OR five years of the carrying out of the landscaping scheme (whichever is later), shall be replaced in the next planting season by specimens of the equivalent stem girth and species in the first suitable planting season.

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

Works shall comply to BS: 4428 Code of practice for general landscaping operations, BS: 5837 (2012) Trees in relation to demolition, design and construction; BS3998: (2010) Tree work - recommendations, BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf); EAS 03:2022 (EN) - Tree Planting Standard.

Reason:

So that the Council may be satisfied with the details of the landscaping scheme, in accordance with: Chapters 8, 12, 15 and 16 of the National Planning Policy Framework (2024); Policies SI 4 (Managing heat risk), SI 13 (Sustainable drainage), G1 (Green Infrastructure, G5 (Urban Greening) and G7 (Trees and Woodlands) of the London Plan 2021; Policy P13 (Design of Places), Policy P14 (Design Quality), Policy P56 (Protection of Amenity), Policy P57 (Open Space), Policy P60 (Biodiversity) and P61 (Trees) of the Southwark Plan (2022).

## 11. Land contamination - Verification report

No occupation of any part of the permitted development shall take place until a verification report demonstrating completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a "long-term monitoring and maintenance plan") for longer-term monitoring of pollutant linkages, maintenance and arrangements for

contingency action, as identified in the verification plan. The long-term monitoring and maintenance plan shall be implemented as approved.

Reason

To ensure development is carried out in line with the aims of the NPPF. To ensure that appropriate investigations are carried out to mitigate any risks to groundwater in the underlying aquifers from historic contamination.

12. Drainage Strategy - Verification Report

No dwelling shall be occupied until a drainage verification report prepared by a suitably qualified engineer has been submitted to and approved in writing by the Local Planning Authority. The report shall provide evidence that the drainage system (incorporating SuDS) has been constructed according to the approved details and specifications as detailed in the Flood Risk Assessment and Drainage Strategy (dated November 2024) prepared by DHA Planning, 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).

13. 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 by the local planning authority.

Reason:

In pursuance of the Local Planning Authority's duty under Section 17 of the Crime and Disorder Act (1998) to consider crime and disorder implications in exercising its planning functions and to improve community safety and crime prevention, in accordance with the National Planning Policy Framework (2024); Policy D11 (Safety Security and Resilience to Emergency) of the London Plan (2021); and Policy P16 (Designing out Crime) of the Southwark Plan (2022).

14. Delivery and Service Management Plan

Prior to first occupation of the development hereby permitted a Delivery and Service Management Plan detailing how all elements of the site are to be serviced shall be submitted to and approved by the Local Planning Authority. The servicing of the development shall be carried out in accordance with the approval given and the Service Management Plan shall remain extant for as long as the development is occupied.

Reason: To ensure compliance with the National Planning Policy Framework (2024); Policy P49 (Public transport); Policy P50 (Highways impacts); Policy P51 (Walking) of the Southwark Plan (2022).

## 15. Student Management Plan

Prior to the occupation of the development hereby approved a Student Management Plan containing details of the move in / move out strategy (drop-off locations, duration of loading/unloading slots, and allocation and management of time slot), security and access control, visitor management, and the management of the vehicle gate to prevent private vehicles from entering the site or parking within the turning area, shall be submitted to and approved in writing by the local planning authority. The development shall then, unless otherwise agreed by the local planning authority, comply with the terms of the approved Management Plan at all times.

### Reason

In order to ensure that the use of the development 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.

## 16. Cycle facilities

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

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

## 17. BREEAM rating of 'Excellent'

a) The development hereby approved shall achieve a BREEAM rating of 'Excellent' or higher, and achieve at least the BREEAM excellent standard for the 'Wat 01' water category or equivalent (commercial development) in the BREEAM Pre-Assessment hereby approved.

b) Before the first occupation of the building hereby permitted, the submission to BRE Post Construction Review documents (or other verification process agreed with the Local Planning Authority), and evidence of the submission to BRE, shall be submitted to and approved in writing by the Local Planning Authority, confirming that the agreed 'Excellent' standard as outlined within the submitted BREEAM pre-assessment have been met.

c) Once certification of the Post Construction Review has been completed by BRE, the certified Post Construction Review including the certificate shall be submitted to and approved in writing by the Local Planning Authority, confirming that

the agreed 'Excellent' standard at as outlined within the submitted BREEAM pre-assessment have been met.

Reason: To ensure the proposal complies with the National Planning Policy Framework (2024); Policy SI 2 (Minimising Greenhouse Gas Emissions) of the London Plan (2021); Policy SI 5 (Water Infrastructure) of the London Plan (2021) and Policy P69 (Sustainability standards) and Policy P70 (Energy) of the Southwark Plan (2022).

#### 18. Wildlife friendly lighting strategy

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

- a) identify those areas/features that are particularly sensitive for bats and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and
- b) show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places. All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority. Prior to the new development being first brought into use/occupied a bat friendly Lighting Plan shall be submitted to and approved by the Local Planning Authority.

Reason: To ensure compliance with the Habitats Regulations and the Wildlife & Countryside Act (1981), (as amended), and because bats are known to be active in vicinity of the development site.

#### 19. Sound transmission between potentially loud non-residential and residential uses

a) Party walls, floors and ceilings between all communal use areas/plant rooms/laundry and habitable residential rooms shall be designed to achieve a minimum weighted standardized level difference of 55dB DnTw+Ctr. Pre-occupation testing of the separating partition shall be undertaken for airborne sound insulation in accordance with the methodology of ISO 16283-1:2014. Details of the specification of the partition together with full results of the sound transmission testing shall be submitted to the Local Planning Authority for written approval prior to the use commencing and once approved the partition shall be permanently maintained thereafter.

b) Notwithstanding the minimum DnTw+Ctr performance in part a) above, party walls, floors and ceilings between the plant rooms/laundry room and habitable

residential rooms shall be further treated as may be necessary to ensure that noise due to the plant/laundry use does not exceed NR20 when measured as an LAeq across any 5 minute period in the habitable room. Following completion of the development and prior to occupation, a validation test shall be carried out on a relevant sample of premises. The results shall be submitted to the LPA for approval in writing and the approved scheme shall be permanently maintained thereafter.

#### Reason

To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of noise nuisance and other excess noise from activities within the commercial premises in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2021.

#### 20. Power assisted gate

Prior to the occupation of the commercial element of the development hereby approved details of a 1.2m wide, power assisted gate at the proposed pedestrian access to the north of the site shall be submitted to and approved in writing by the local planning authority. The use of this access shall be restricted to pedestrians and wheelchair users only. The development shall then, unless otherwise agreed by the local planning authority, be carried out in accordance with the approval details and the pedestrian gate be retained and maintained in perpetuity.

#### Reason

In order to ensure that routes and access are safe and designed to be inclusive and meet the needs of all pedestrians, with particular emphasis on disabled people and the mobility impaired in accordance with Policy P51 Walking of the Southwark Plan 2022.

#### 21. Landscape management plan

Prior to the occupation of the development or any phase of the development, whichever is the sooner, a landscape management plan, including long term design objectives to meet BNG requirements, management responsibilities and maintenance schedules for all landscape areas, other than small, privately owned, domestic gardens, shall be submitted to and approved by the Local Planning Authority.

Details of an irrigation schedule shall be provided for all trees to ensure successful establishment.

For stem girths of up to 20cm the schedule shall be a minimum of three years, and five years for stem girths greater than 20cm. The landscape management plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the local planning authority.

If within a period of five years from the date of the planting of any tree that tree, or any tree planted in replacement for it, is removed, uprooted or

destroyed or dies, or becomes, in the opinion of the local planning authority, seriously damaged or defective, another tree of the same species and size as that originally planted shall be planted at the same place in the first suitable planting season., unless the local planning authority gives its written consent to any variation.

Works shall comply to BS: 4428 Code of practice for general landscaping operations, BS: 8545 (2014) Trees: from nursery to independence in the landscape; BS3998: (2010) Tree work - recommendations; BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf); EAS 01:2021 (EN) -Tree Pruning Standard; EAS 03:2022 (EN) - Tree Planting Standard.

Reason: So that the Council may be satisfied with the details of the landscaping scheme, in accordance with: Chapters 8, 12, 15 and 16 of the National Planning Policy Framework (2024); Policies SI 4 (Managing heat risk), SI 13 (Sustainable drainage), G1 (Green Infrastructure, G5 (Urban Greening) and G7 (Trees and Woodlands) of the London Plan 2021; Policy P13 (Design of Places), Policy P14 (Design Quality), Policy P56 (Protection of Amenity), Policy P57 (Open Space), Policy P60 (Biodiversity) and P61 (Trees) of the Southwark Plan (2022).

## 22. Wildlife friendly lighting

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

- a) identify those areas/features that are particularly sensitive for bats and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and
- b) show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places. All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority. Prior to the new development being first brought into use/occupied a bat friendly Lighting Plan shall be submitted to and approved by the Local Planning Authority.

Reason: To ensure compliance with the Habitats Regulations and the Wildlife & Countryside Act (1981), (as amended), and because bats are known to be active in vicinity of the development site.

## **Permission is subject to the following Compliance Condition(s)**

### 23. Piling / foundation designs

Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the local planning authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details

Reason

To ensure that any foundation works carried out on site are done so under an appropriate strategy to mitigate any risks to groundwater presented by working in any contaminated ground present, in line with the sustainable development aims of the NPPF.

24. Infiltration of surface water

No drainage systems for the infiltration of surface water to the ground are permitted other than with the written consent of the local planning authority. Any proposals for such systems must be supported by an assessment of the risks to controlled waters. The development shall be carried out in accordance with the approved details.

Reason

To protect groundwater in the underlying Thanet Sand and chalk aquifers

25. Residential internal noise levels ' standard

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 LAeq T\*, 45dB LAFmax T \*

Living and Dining rooms- 35dB LAeq T '

\* - Night-time 8 hours between 23:00-07:00

' - Daytime 16 hours between 07:00-23:00.

Reason:

To ensure that the occupiers and users of the development do not suffer a loss of amenity by reason of excess noise from environmental and transportation sources in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2021.

26. Commercial use Permitted Development rights removed

Notwithstanding the provisions of Schedule 2 Part 7 Class F of the Town and Country Planning (General Permitted Development) Order 2015 (as amended or any re-enactment thereof) no extension nor alteration of an office building shall be carried out pursuant to those provisions.

Reason: To safeguard the character and the amenities of the premises and adjoining properties in accordance with the National Planning Policy Framework (2024) and Policy P14 (Design quality) of the Southwark Plan (2022).

27. Restrictions of use of the roofs

The roofs of the building hereby permitted, other than where indicated to provide a terrace amenity space on the approved drawings, shall not be used other than for maintenance or as a means of escape and shall not be used for any other purpose including use as a roof terrace or balcony or for the purpose of sitting out.

Reason: In order that the privacy of neighbouring properties may be protected from overlooking from use of the roof area in accordance with the National Planning Policy Framework (2024) and Policy P56 (Protection of amenity) of the Southwark Plan (2022).

28. Plant Noise

The Rated sound level from any plant, together with any associated ducting shall not exceed the Background sound level (LA90 15min) at the nearest noise sensitive premises. Furthermore, the plant Specific sound level shall be 10dB(A) or more below the background sound level in this location. For the purposes of this condition the Background, Rating and Specific sound levels shall be calculated in full accordance with the methodology of BS4142:2014 +A1:2019.

Reason:

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance or the local environment from noise creep due to plant and machinery in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2021

29. Hours of use - commercial

The commercial uses hereby permitted shall not be carried on outside of the hours 07:00 to 22:00 on any day.

Reason

To safeguard the amenity of neighbouring residential properties in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2021.

30. Class E (g) (i) and Class E (g) (iii) purposes only

Notwithstanding the provisions of the Town and Country Planning (Use Classes) Order 1987 and any associated provisions of the Town and Country Planning General Permitted Development Order (including any future amendment of enactment of those Orders) the Class E floorspace hereby approved shall be used for use Class E (g) (i) and Class E (g) (iii) purposes only unless otherwise agreed by way of a formal application for planning permission.

Reason: In accordance with the application details and order to ensure that the site continues to provide employment floorspace which can accommodate light industrial uses in accordance with Policy P29 (Strategic protected industrial land) of the Southwark Plan (2022) and 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).

31. Materials

The materials to be used in the implementation of this permission shall not be otherwise than as described and specified in the application and on the drawings hereby approved unless the prior written consent of the Local Planning Authority has been obtained for any proposed change or variation.

Reason: To ensure that the new works blend in with the existing building in the interest of the design and appearance of the building in accordance with 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).

**Permission is subject to the following Special Condition(s)**

32. Biodiversity roof

Details of the biodiversity (green/brown) roof(s) shall be submitted to and approved in writing by the Local Planning Authority prior to any superstructure works commencing on site. The biodiversity (green/brown) roof(s) shall be:

Intensive green roof or vegetation over structure. Substrate minimum settled depth of 150mm,

Or, extensive green roof with substrate of minimum settled depth of 80mm (or 60mm beneath vegetation blanket) - meets the requirements of GRO Code 2014,

Laid out in accordance with roof plans; hereby approved; and

Planted/seeded with an agreed mix of species within the first planting season following the practical completion of the building works (focused on minimum 75% wildflower planting, and no more than a maximum of 25% sedum coverage).

The biodiversity (green/brown) roof shall not be used as an amenity or sitting out space of any kind whatsoever and shall only be used in the case of essential maintenance or repair, or escape in case of emergency.

The biodiversity roof(s) shall be carried out strictly in accordance with the details so approved and shall be maintained as such thereafter.

Discharge of this condition will be granted on receiving the details of the green/brown

roof(s) and the Local Planning Authority agreeing the submitted plans, and once the green/brown roof(s) are completed in full in accordance to the agreed plans.

Reason: To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity as well as contributing to the Urban Greening Factor requirements of the London Plan (2021) with the aim of attaining a minimum score of 0.4 for residential developments and 0.3 for commercial developments in accordance with the National Planning Policy Framework (2024); Policy G1 (Green Infrastructure), Policy G5 (Urban Greening), Policy G6 (Biodiversity and access to nature); Policy P59 (Green infrastructure) and Policy P60 (Biodiversity) of the Southwark Plan (2022).

33. Travel Plan

- a) Upon reaching 50% occupancy of the building, the applicant shall submit in writing and obtain the written approval of the Local Planning Authority to a Travel Plan written in accordance with TfL best guidance at the time of submission, including a baseline travel survey and setting out the proposed measures to be taken to encourage the use of modes of transport other than the car by all users of the building, including staff and visitors.
- b) At the end of the first year of operation of the approved Travel Plan, a detailed survey showing the methods of transport used by all those users of the building to and from the site and how this compares with the proposed measures and any additional measures to be taken to encourage the use of public transport, walking and cycling to the site shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise in accordance with any such approval given.
- c) At the end of the third year of operation of the approved Travel Plan a detailed survey showing the methods of transport used by all those users of the building to and from the site and how this compares with the proposed measures and any additional measures to be taken to encourage the use of public transport, walking and cycling to the site shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise in accordance with any such approval given.
- c) At the end of the fifth year of operation of the approved Travel Plan a detailed survey showing the methods of transport used by all those users of the building to and from the site and how this compares with the proposed measures and any additional measures to be taken to encourage the use of public transport, walking and cycling to the site shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise in accordance with any such approval given.

Reason: In order that the use of non-car-based travel is encouraged in accordance with the National Planning Policy Framework (2024); Policy T6 (Car parking) of the London Plan (2021); Policy P54 (Car parking) of the Southwark Plan (2022).

34. 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.

#### Reason

In order that the Council may be satisfied as to the details of the development in the interest of the visual amenity of the area, the amenity and privacy of adjoining occupiers, and their protection from light nuisance, in accordance with the Southwark Plan 2022 Policy P16 (Designing out crime); Policy P56 (Protection of amenity), and the National Planning Policy Framework 2021.

#### 35. Bat tubes, bricks or boxes

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

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

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

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

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

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

#### Informatics

##### 1 Piling

With respect to any proposals for piling through made ground, we would refer you to the EA guidance document "Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention" (NGWCL Centre Project NC/99/73). We suggest that approval of piling methodology is further discussed with the EA when the guidance has been utilised to design appropriate

piling regimes at the site

## 2. Nesting Birds

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

## APPENDIX 2

### Planning Policy

The revised National Planning Policy Framework ('NPPF') was published on 12 December 2024 which sets out the national planning policy and how this needs to be applied. The NPPF focuses on sustainable development with three key objectives - economic, social and environmental.

Paragraph 231 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications.

The relevant chapters from the Framework are:

- Chapter 2 Achieving sustainable development
- Chapter 5 Delivering a sufficient supply of homes
- Chapter 6 Building a strong, competitive economy
- Chapter 7 Ensuring the vitality of town centres
- Chapter 8 Promoting healthy and safe communities
- Chapter 9 Promoting sustainable transport
- Chapter 10 Supporting high quality communications
- Chapter 11 Making effective use of land
- Chapter 12 Achieving well-designed and beautiful places
- Chapter 14 Meeting the challenge of climate change, flooding and coastal change
- Chapter 15 Conserving and enhancing the natural environment
- Chapter 16 Conserving and enhancing the historic environment

### The London Plan 2021

On 2 March 2021, the Mayor of London published the London Plan 2021. The spatial development strategy sets a strategic framework for planning in Greater London and forms part of the statutory Development Plan for Greater London. The relevant policies are:

- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering good design
- Policy HC1 Heritage conservation and growth
- Policy T4 Assessing and mitigating transport impacts
- Policy T6 Car parking

### Southwark Plan 2022

The Southwark Plan 2022 was adopted on 23 February 2022. The plan provides strategic policies, development management policies, area visions and site allocations which set out the strategy for managing growth and development across the borough from 2019 to 2036. The relevant policies are:

P13 Design of places  
P14 Design quality  
P15 Residential design

P20 Conservation areas  
P21 Conservation of the historic environment and natural heritage  
P26 Local list  
P49 Public transport  
P50 Highways impacts  
P51 Walking  
P53 Cycling  
P54 Car Parking  
P55 Parking standards for disabled people and the physically Impaired

### Supplementary Planning Documents (SPDs)

Of relevance in the consideration of this application are the:

Other guidance:  
Southwark Air Quality Action Plan Action 3, 4.2, 7.5, 7.8 and 8.  
Streets for People objectives 1, 3, 4, 5, 6, 9 and 11.  
Streets for People objective 4 and Air Quality Action Plan (Action 7.5)  
Manual for Streets and Southwark's DS.114 and DS.132  
Southwark Walking Plan objectives 1 and 2  
Southwark Council Delivery Plan  
"The setting of Heritage Assets" (Historic England)

### Emerging planning policy

The following emerging SPDs are undergoing consultation:  
Affordable Housing SPD (updated) 2024  
Climate and Environment SPD 2024  
Section 106 and Community Infrastructure Levy SPD 2024

## APPENDIX 3

### Relevant planning history

<b>Reference and Proposal</b>	<b>Status</b>
25/EN/0391 Alleged breach of planning control: Use of land as a waste dumping site	Ongoing
<b>19/AP/2544</b> Demolition of all existing buildings; construction of 2no. three storey blocks and 2no. part three and part four storey blocks containing 36no. self-contained flats comprising 15no. one bedroom units, 14no. two bedroom units and 7no. three bedroom units; closure of northern access from Bush Road; and provision of associated landscaping, parking and turning areas.	REFUSED - Major 29/06/2023
<b>19/AP/1208</b> Certificate of lawfulness for the construction of rear dormer extensions with 2 roof lights to front roof slope and window to the rear	GRANTED - Certificate of Lawfulness Prop 13/06/2019

**APPENDIX 4****Consultation undertaken**

Site notice date: 04/02/2025

Press notice date: 13/03/2025

Case officer site visit date: n/a

Neighbour consultation letters sent:

Internal services consulted

LBS Environmental Protection Team

LBS Ecology Officer

LBS Transport Policy Team

LBS Archaeologist

LBS Design And Conservation Team [Formal Consultation]

LBS Local Economy

LBS Ecology Officer

LBS Planning Enforcement Team

LBS Highways Development & Management

LBS Highways Licensing

LBS Housing Regeneration And Delivery Division

Flood Risk Management & Urban Drainage Team

LBS Urban Forester

LBS Waste Management Team

Flood Risk Management & Urban Drainage Team

LBS Transport Policy Team

LBS Waste Management Team

LBS Highways Development & Management

LBS Transport Policy Team

LBS Transport Policy Team

LBS Local Economy

Statutory and non-statutory organisations

Environment Agency

Greater London Authority

Historic England - Heritage

London Fire & Emergency Planning Authority

London Underground

Natural England - London Region & South East Region

Network Rail

Metropolitan Police Service (Designing Out Crime)

Transport For London

Transport For LondonThames Water

Neighbour and local groups consulted:

264 Lower Road London Southwark  
 Flat 10 Court Yard House 1B Rotherhithe New Road  
 Flat 3 Court Yard House 1B Rotherhithe New Road  
 Flat 1 Nordic Court 3 Rotherhithe New Road  
 244 Lower Road London Southwark  
 38 Bestwood Street London Southwark  
 228 Lower Road London Southwark  
 268A Lower Road London Southwark  
 12 Bestwood Street London Southwark  
 206 Lower Road London Southwark  
 3 Nemus Apartments 21 - 43 Bush Road London  
 Flat 4 276A Lower Road London  
 28 Bestwood Street London Southwark  
 Flat 5 276A Lower Road London  
 234 Lower Road London Southwark  
 Flat 2 276A Lower Road London  
 268B Lower Road London Southwark  
 22 Bestwood Street London Southwark  
 20 Bestwood Street London Southwark  
 40 Bestwood Street London Southwark  
 4 Bestwood Street London Southwark  
 46 Bestwood Street London Southwark  
 15 Bush Road London Southwark  
 17 Bush Road London Southwark  
 1 Bush Road London Southwark  
 18 Bestwood Street London Southwark  
 3 Bush Road London Southwark  
 Nordic Court 3 Rotherhithe New Road London  
 1 Rotherhithe New Road London Southwark  
 Flat 2 Nordic Court 3 Rotherhithe New Road  
 First Floor Flat 200 - 202 Lower Road London  
 1 Nemus Apartments 21 - 43 Bush Road London  
 Flat C 19 Bush Road London  
 Flat B 19 Bush Road London  
 Flat A 19 Bush Road London  
 19A Bush Road London Southwark  
 16 Bestwood Street London Southwark  
 Flat 2 Buryfield Court 254 - 258 Lower Road  
 5A Bush Road London Southwark  
 Flat 1 47 Bush Road London  
 Flat 4 47 Bush Road London  
 Flat 7 47 Bush Road London  
 42 Bestwood Street London Southwark  
 226 Lower Road London Southwark  
 48 Bestwood Street London Southwark  
 250 Lower Road London Southwark  
 236 Lower Road London Southwark  
 32 Bestwood Street London Southwark  
 266A Lower Road London Southwark

36 Bestwood Street London Southwark  
34 Bestwood Street London Southwark  
30 Bestwood Street London Southwark  
24 Bestwood Street London Southwark  
1C Bush Road London Southwark  
26 Bestwood Street London Southwark  
Flat 4 Nordic Court 3 Rotherhithe New Road  
Flat 7 Court Yard House 1B Rotherhithe New Road  
Flat 6 Court Yard House 1B Rotherhithe New Road  
Court Yard House 1B Rotherhithe New Road London  
Flat 8 Court Yard House 1B Rotherhithe New Road  
Flat 5 Court Yard House 1B Rotherhithe New Road  
Flat 6 Nordic Court 3 Rotherhithe New Road  
Flat 5 Nordic Court 3 Rotherhithe New Road  
Js Estate Management Ltd 1A Rotherhithe New Road London  
Flat 1 Court Yard House 1B Rotherhithe New Road  
Flat 9 Court Yard House 1B Rotherhithe New Road  
Flat 4 Court Yard House 1B Rotherhithe New Road  
Flat 2 Court Yard House 1B Rotherhithe New Road  
Vapey Cakes 1A Rotherhithe New Road London  
1A Rotherhithe New Road London Southwark  
Flat 3 Nordic Court 3 Rotherhithe New Road  
Flat A 228 Lower Road London  
228C Lower Road London Southwark  
Flat B 228 Lower Road London  
242 Lower Road London Southwark  
246 Lower Road London Southwark  
9 Bush Road London Southwark  
13 Bush Road London Southwark  
Flat 6 276A Lower Road London  
Basement And Ground Floor 272 Lower Road London  
14 Nemus Apartments 21 - 43 Bush Road London  
Flat 4 Buryfield Court 254 - 258 Lower Road  
18 Nemus Apartments 21 - 43 Bush Road London  
Flat 6 Buryfield Court 254 - 258 Lower Road  
Flat 5 Buryfield Court 254 - 258 Lower Road  
210 - 212 Lower Road London Southwark  
Ground Floor Flat 236 Lower Road London  
13 Nemus Apartments 21 - 43 Bush Road London  
10 Nemus Apartments 21 - 43 Bush Road London  
8 Nemus Apartments 21 - 43 Bush Road London  
5 Nemus Apartments 21 - 43 Bush Road London  
2 Nemus Apartments 21 - 43 Bush Road London  
Nemus Apartments 21 - 43 Bush Road London  
21 Nemus Apartments 21 - 43 Bush Road London  
19 Nemus Apartments 21 - 43 Bush Road London  
16 Nemus Apartments 21 - 43 Bush Road London  
Flat 9 276A Lower Road London  
Flat 3 Buryfield Court 254 - 258 Lower Road  
6 Bestwood Street London Southwark  
9 Nemus Apartments 21 - 43 Bush Road London  
Flat 3 276A Lower Road London

238 Lower Road London Southwark  
Flat 5 47 Bush Road London  
15 Nemus Apartments 21 - 43 Bush Road London  
268 Lower Road London Southwark  
4 Nemus Apartments 21 - 43 Bush Road London  
252 Lower Road London Southwark  
Flat 7 Buryfield Court 254 - 258 Lower Road  
17 Nemus Apartments 21 - 43 Bush Road London  
248 Lower Road London Southwark  
Flat 6 47 Bush Road London  
Flat 3 47 Bush Road London  
45B Bush Road London Southwark  
45A Bush Road London Southwark  
6 Nemus Apartments 21 - 43 Bush Road London  
Flat 7 276A Lower Road London  
260 Lower Road London Southwark  
Flat 1 Buryfield Court 254 - 258 Lower Road  
224 Lower Road London Southwark  
8 Bestwood Street London Southwark  
270 Lower Road London Southwark  
216 Lower Road London Southwark  
214 Lower Road London Southwark  
Flat 8 47 Bush Road London  
276 Lower Road London Southwark  
240 Lower Road London Southwark  
Flat 9 47 Bush Road London  
276A Lower Road London Southwark  
Flat 1 276A Lower Road London  
Flat 10 276A Lower Road London  
272A Lower Road London Southwark  
Flat 2 47 Bush Road London  
12 Nemus Apartments 21 - 43 Bush Road London  
11 Nemus Apartments 21 - 43 Bush Road London  
7 Nemus Apartments 21 - 43 Bush Road London  
Flat 8 276A Lower Road London  
10 Bestwood Street London Southwark  
266B Lower Road London Southwark  
262A Lower Road London Southwark  
20 Nemus Apartments 21 - 43 Bush Road London  
264B Lower Road London Southwark  
210A Lower Road London Southwark  
First Floor Flat 236 Lower Road London  
262B Lower Road London Southwark  
204 Lower Road London Southwark  
Basement 1A Rotherhithe New Road London  
Advertising Right 276 Lower Road London  
5 Bush Road London Southwark  
Basement Flat 234 Lower Road London  
1B Bush Road London Southwark  
270B Lower Road London Southwark  
Ground Floor And First Floor Flat 234 Lower Road London  
Flat A 17 Bush Road London

Ground Floor 200 - 202 Lower Road London  
Flat 2 226 Lower Road London  
Flat 1 226 Lower Road London  
Flat 206 Lower Road London  
Flat 208 Lower Road London  
208 Lower Road London Southwark  
Flat 220 Lower Road London  
220 Lower Road London Southwark  
222C Lower Road London Southwark  
222A Lower Road London Southwark  
222B Lower Road London Southwark  
232 Lower Road London Southwark  
266 Lower Road London Southwark  
44 Bestwood Street London Southwark  
200 - 202 Lower Road London Southwark  
218 Lower Road London Southwark  
11 Bush Road London Southwark  
3A Bush Road London Southwark  
1A Bush Road London Southwark  
230 Lower Road London Southwark  
218A Lower Road London Southwark  
Flat B 17 Bush Road London  
236B Lower Road London Southwark  
45C Bush Road London Southwark  
Buryfield Court 254 - 258 Lower Road London  
14 Bestwood Street London Southwark  
2 Bestwood Street London Southwark  
7 Bush Road London Southwark  
47 Bush Road London Southwark  
272 Lower Road London Southwark  
264A Lower Road London Southwark  
270A Lower Road London Southwark  
214B Lower Road London Southwark  
238B Lower Road London Southwark  
Advertising Right Lower 276 Lower Road London  
274B Lower Road London Southwark  
274 Lower Road London Southwark  
274 - 274B Lower Road London Southwark  
274A Lower Road London Southwark

## **APPENDIX 5**

### **Consultation responses received**

#### **Internal services**

LBS Environmental Protection  
 LBS Ecology  
 LBS Transport Policy  
 LBS Archaeology  
 LBS Design & Conservation Team [Formal]  
 LBS Local Economy  
 LBS Ecology  
 LBS Highways Development & Management  
 LBS Flood Risk Management & Urban Drain  
 LBS Urban Forester  
 LBS Waste Management  
 LBS Flood Risk Management & Urban Drain  
 LBS Transport Policy  
 LBS Transport Policy  
 LBS Transport Policy

#### **Statutory and non-statutory organisations**

Environment Agency  
 London Fire & Emergency Planning Authority  
 London Underground  
 Network Rail  
 Metropolitan Police Service

#### **Neighbour and local groups consulted:**

Flat 1 William Evans House London  
 Cecily Dunn house London SE8 5FX  
 Lavender House Rotherhithe Street London  
 19 John Brent house London  
 18 John Brent House London SE8 5AT  
 2 John Brent house London Se85at  
 14 John Brent London Se8 5at  
 36 Tissington Court Rotherhithe New Road London  
 12 William Evans House London SE8 5AU  
 28 Robinia House 10 Blondin Way London  
 20 rotherhithe road London Se162ag  
 222A Lower Road London SE8 5DJ

16 John Brent House London Se85AT  
 69 Tissington Court London Se162AQ  
 10 Tissington Court Rotherhithe New Road London  
 34 Tissington Court London SE16 2AG  
 Apt 9 K London SE8  
 3 Greenland Mews London  
 2 Cecily Dunn House Bush Road London  
 222a Lower Road London SE8 5DJ  
 264B Lower Road London SE8 5DJ  
 216 Lower Road, London, SE8 5DJ, United Kingdom London SE85DJ  
 30 Basque Court London SE16 6XD  
 25 Campion House 6 Blondin Way London  
 Russell Place Uk London  
 94-96 Trundleys Road 3 Heritage Court London  
 11 Fern Walk London SE16 3JD  
 Flat 34 Ottawa Albatross way London  
 Risdon House Albion Street London  
 Ground Floor And First Floor Flat 234 Lower Road London  
 18 Nemus Apartments 21-43 Bush Road LONDON  
 21 Nemus Apartments 21 Bush Road London  
 19, Nemus Apartments 21-43 Bush Road London  
 3 Hurley Crescent London Southwark  
 18 King Frederick Ninth Tower Surrey Quays London  
 57 Pynfolds Estate London SE16 4NU  
 Flat 8 John Brent House London Se8 5AT  
 Aldwych House 71-79 Aldwych London  
 8 Lavender Road London SE16 5DZ  
 63 Tissington Court London SE16 2AQ  
 48 trevithick house London SE16 3PE  
 40A Royal Hill GREENWICH London  
 20 Finland street London SE16 7TP  
 222 Lower Road London Se8 5DJ  
 8 Pine House London se167de  
 75 Clarence mews Rotherhithe SE16 5GD  
 Bloom Heights London SE8 5FT  
 6 Grange Yard Bermondsey LONDON  
 246 Lower Road Rotherhithe London  
 250 Lower Road London SE8 5DJ  
 10 Imperial Court 4B Odessa Street London  
 Eagle Close London SE163DJ  
 Flat 28 Osier House, 14 Quebec Way London  
 Flat 5 Buryfield Court, lower Road London  
 17 Timbrell Place London SE16 5HU  
 Flat 41 Gaugin court South bermondsey Se163eb  
 Flat 12 Haredale House East Lane London  
 flat 33,29 surrey quays road southwark se16 7fz  
 28 Robinia House 10 Blondin Way London  
 Flat 7 Pennington Court 245 Rotherhithe Street London  
 Trundleys Road London SE8  
 62 the arches London Se8 5bt  
 20 Bestwood Street London SE85AW  
 139 inwen Court London Se8 5bl

15 Chilton Grove London SE85EE  
38 Dock Hill Avenue London SE16 6AY  
Flat 14 Hampton Court London  
13 Wolfe Crescent Canada street London  
14 Hampton Court King and Queen Wharf Rotherhithe Street London  
Flat 10, 39 Reculver Road London SE16 2RW  
3 Windsor Court London SE16 5SJ  
34 Blackthorn House 7 Blondin Way London Se16 6BB  
FLAT 2, Burrhill Court, Worgan Street London SE16 7WG  
Flat 34 392 Rotherhithe Street London  
99 John Silkin Lane London SE8 5BE  
91 Abbeyfield Road London Se162bs  
1 Albert Starr house London SE8 5AS  
244 Lower Road London SE8 5DJ  
21-43 Bush Road London SE85AP  
250 Lower Road London SE8 5DJ  
Cabinet Office 160 Tooley Street London  
246 Lower Road Rotherhithe London  
246 Lower Road Rotherhithe London  
Flat 5 Buryfield Court Surrey Quays London  
216 Lower Road London SE85DJ  
232 Lower Road London Southwark  
Flat B 236 Lower Road London SE8 5DJ  
Ground Floor Flat 236 Lower Road London

OPEN

COMMITTEE:

**PLANNING COMMITTEE (SMALLER APPLICATIONS)**

NOTE:

Original held in Constitutional Team; all amendments/queries to Beverley Olamijulo, Constitutional Team, Tel: 020 7525 7234

MUNICIPAL YEAR 2025-26

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