Open Agenda

Planning Committee (Major Applications) B

Wednesday 14 May 2025
6.30 pm
Ground Floor Meeting Room G02A - 160 Tooley Street, London SE1 2QH

Membership	Reserves
Councillor Richard Livingstone (Chair)	Councillor Sam Dalton
Councillor Kath Whittam (Vice-Chair)	Councillor Gavin Edwards
Councillor Ketzia Harper	Councillor Nick Johnson
Councillor Jon Hartley	Councillor Richard Leeming
Councillor Cleo Soanes	Councillor Darren Merrill
Councillor Michael Situ	Councillor Reginald Popoola
Councillor Emily Tester	Councillor Martin Seaton

INFORMATION FOR MEMBERS OF THE PUBLIC

Access to information

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

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Access

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

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

Members of the committee are summoned to attend this meeting
Althea Loderick
Chief Executive
Date: 6 May 2025

PRINTED ON RECYCLED PAPER

Planning Committee (Major Applications) B

Wednesday 14 May 2025
6.30 pm
Ground Floor Meeting Room G02A - 160 Tooley Street, London SE1 2QH

Order of Business

Item No.	Title	Page No.

PART A - OPEN BUSINESS

1. APOLOGIES

To receive any apologies for absence.

2. CONFIRMATION OF VOTING MEMBERS

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

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

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

4. DISCLOSURE OF INTERESTS AND DISPENSATIONS

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

5. MINUTES 1 - 6

To approve as a correct record the minutes of the meeting held on 2 April 2025.

Item No.	Title	Page No.
6.	**ADOPTION OF THE AFFORDABLE HOUSING SUPPLEMENTARY PLANNING DOCUMENT, SECTION 106 AND COMMUNITY INFRASTRUCTURE LEVY SUPPLEMENTARY PLANNING DOCUMENT AND HOUSEHOLDER DEVELOPMENT SUPPLEMENTARY PLANNING DOCUMENT.**	7 - 183
7.	**DEVELOPMENT MANAGEMENT**	184 - 188
7.1.	**24/AP/3687 - 79-161 ILDERTON ROAD, LONDON, SE16 3JZ**	189 - 452
7.2.	**20/AP/2993 - RICH INDUSTRIAL ESTATE, CRIMSCOTT STREET AND WILLOW WALK, LONDON SE1 5TE**	*To Follow*

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

EXCLUSION OF PRESS AND PUBLIC

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

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

DISTRIBUTION LIST

Date: 6 May 2025

Planning Committee (Major Applications)

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

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

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

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

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

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

   (b) The applicant or applicant's agent.

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

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

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

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

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

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

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

8. Each speaker should restrict their comments to the planning aspects of the proposal and should avoid repeating what is already in the report. The meeting is not a hearing where all participants present evidence to be examined by other participants.

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

10. No smoking is allowed at committee.

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

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

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

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

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

Agenda Item 5.

Planning Committee (Major Applications) B

MINUTES of the OPEN section of the Planning Committee (Major Applications) B held on Wednesday 2 April 2025 at 6.30 pm at Ground Floor Meeting Room G01A - 160 Tooley Street, London SE1 2QH

PRESENT:	Councillor Richard Livingstone (Chair) Councillor Kath Whittam Councillor Jon Hartley Councillor Michael Situ Councillor Emily Tester
OTHER MEMBERS PRESENT:	Councillor James McAsh Councillor Portia Mwangangye Councillor Dora Dixon-Fyle
OFFICER SUPPORT:	Colin Wilson, (Assistant Director Strategic Development) Michael Feeney, (External Legal Counsel, FTB Chambers) Dipesh Patel, (Head of Planning, Strategic Applications) Rob Davies, (Team Leader, Transport Planning) Neil Loubser, (Team Leader, Resources) Julia Craig, (Senior Strategy Officer, Resources) Gregory Weaver, (Constitutional Officer)

1. APOLOGIES

Apologies were received from Councillor Harper and Soanes.

2. CONFIRMATION OF VOTING MEMBERS

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

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

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

4. DISCLOSURE OF INTERESTS AND DISPENSATIONS

The following member declared an interest in item:

7.1 24/AP/2314 – HALL AND CO LTD JEWSON SITE, RAILWAY RISE, LONDON, SOUTHWARK SE22 8WW

Councillor Kath Whittam, pecuniary, declared that she would withdraw from the item.

5. MINUTES

RESOLVED:

That the minutes for the Planning Committee (Major Applications) B meeting held on 5 March 2025 be approved as a correct record signed by the chair.

6. RELEASE OF £189,648.00 FROM S106 AGREEMENTS ACROSS THE BOROUGH TO SUPPORT THE DELIVERY OF AN AFFORDABLE WORKSPACE IN ELEPHANT & CASTLE

Report: See pages 5 – 21 of the main agenda report.

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

RESOLVED:

1. That the Planning Committee (Major Applications) B approves the release of the funds amounting to £189,648.00 which were received by the council (pursuant to the terms of the s.106 legal agreements pertaining to the planning applications noted in Table 1, below) and will be used to support the delivery of an affordable workspace (known as the "Enterprise Hub") in the borough.

Table 1 – Summary of Requested Funding.

Planning application Reference	Profit Centre	Spend Category	Address	Amount to be used
17/AP/3170	W08499	Affordable Workspace	18-19 CRIMSCOTT STREET, SE1 5TE	£83,449.00
21/AP/1825	W09169		140-148 Borough High Street, SE1 1LB	£43,440.00
19/AP/1173	W09689		150-154 Borough High Street SE1 1LB	£62,759.00
				£189,648.00

7. DEVELOPMENT MANAGEMENT

RESOLVED:

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

2. That the decisions made on the planning applications be subject to the conditions and/or made for the reasons set out in the attached reports unless otherwise stated be agreed.

3. That where reasons for decisions or conditions were not included or not as included in the reports relating to an individual item, they be clearly specified and agreed.

7.1 24/AP/2314 - HALL AND CO LTD JEWSON SITE, RAILWAY RISE, LONDON SOUTHWARK SE22 8WW

Planning Application Number: 24/AP/2314

Report: See pages 27 – 160 of the main agenda report and pages 1 – 6 of the addendum report.

Proposal:

"Demolition of existing buildings and construction of a mixed-use development of 3 buildings being 1) part 5, part 6 part 7 storeys, 2) part 5, part 7, part 8 storeys and 3) part 7 and part 8 storeys, accommodating up to 1,229sqm of storage and distribution space (Use Class B8), 53 affordable residential homes (Use Class C3)

(40% affordable by habitable room) and 360 purpose- built student accommodation rooms (Use Class Sui Generis) with ancillary cycle parking, refuse stores, car parking and landscaping."

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

Members put questions to the officers.

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

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

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

Councillor James McAsh and Portia Mwangangye gave a statement and answered questions put by members of the committee.

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

Members asked for the following to be included:

- Construction management plan
- Any biodiversity offset that comes back to planning committee to be allocated in Goose Green ward
- Chair to write to Cabinet Member for Housing to request a local lettings process in place

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

RESOLVED:

1. That the planning permission be granted subject to conditions, the applicant entering into an appropriate legal agreement, and referral to the Mayor of London.

2. In the event that the requirements of paragraph 1 above are not met by 01 July 2025, the Director of Planning and Growth be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 256.

7.2 23/AP/2786 - CAMBERWELL GREEN MAGISTRATES COURT, 15 DEYNSFORD ROAD, LONDON SE5 7UP

Planning Application Number: 23/AP/2786

Report: See pages 161 – 372 of the main agenda report and pages 6 – 8 of the addendum report.

Proposal:

"Conversion and extension of the existing court building (use class D1) up to 6 and 15 storeys, for residential (Class C3), hotel (Class C1), community (Class F2) & recording studio (Class E) uses. Highways, landscaping and public realm works.

Further information to describe the proposal:
134 new homes;
150 hotel rooms;
130.7sqm of class E floorspace;
2498sqm of class F2 floorspace;
Maximum height of the building would be 52.9m above ground level (to top of roof top plant screening)"

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

Members put questions to the officers.

Representatives of the objectors and ward councillor Dora Dixon-Fyle addressed the committee and responded to questions put by members of the committee.

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

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

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

Members asked for the following to be included:

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

RESOLVED:

1. That the delegated authority to negotiate and complete a Deed of Variation to the legal agreement signed as part of planning consent 12/AP/4126 (as amended by 17/AP/3694, 16/AP/0200, 15/AP/2821 and a further Deed of Variation dated 18 January 2023) be agreed.

Meeting ended at 10.20 pm

CHAIR:

DATED:

Agenda Item 6.

Meeting Name:	Planning Committee B
Date:	14 May 2025
Report title:	Adoption of the Affordable Housing Supplementary Planning Document, Section 106 and Community Infrastructure Levy Supplementary Planning Document and Householder Development Supplementary Planning Document.
Ward(s) or groups affected:	All
Classification:	Open
Reason for lateness (if applicable):	N/A
From:	Charlotte Brooks-Lawrie Head of Planning Policy

RECOMMENDATION(S)

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

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

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

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

BACKGROUND INFORMATION

4. The Southwark Plan 2022 was adopted in February 2022. To support the implementation of this document, SPDs have been prepared to provide applicants and case officers with additional information on how to implement the policies and what considerations should be taken into account when applying the policies.

5. This includes the Householder Development SPD, the Affordable Housing SPD, the S106 and CIL SPD and the Climate and Environment SPD. The Climate and Environment SPD will be presented to the planning committee at a later date (likely in September 2025) and is not covered by this report.

6. The SPDs provides guidance on how to apply the relevant policies of the Southwark Plan 2022. The documents give guidance on how to conform to the additional national and local legislature and policies within which the council must operate.

7. The SPDs will be a material consideration and will have weight in the determination of a planning application.

8. The purpose of each SPD is:

Householder Development SPD

9. The purpose of the Householder Development SPD is to set out the standard of design expected from the development of existing homes in Southwark. The guidance covers a broad range of works you can consider when looking to improve or extend your home. The guidance in this SPD is relevant to all existing homes, whether a house or a flat but does not apply to the creation of new homes.

10. The Householder Development SPD will replace the Residential Design Standards SPD (2011, updated 2015).

Section 106 and CIL SPD

11. The purpose of the Section 106 and CIL SPD is to set out how Section 106 obligations and CIL are used by the council. The SPD also contains details of the specific financial and non-financial obligations which may be required by new developments on-site or off-site.

12. The Section 106 and CIL SPD will replace the existing Section 106 Obligations and CIL SPD (adopted in 2015 and updated in 2020).

13. The updated financial obligations set out in the SPD have been viability tested by BNPPRE. The viability testing built upon the independently examined viability evidence used for the Southwark 2022. These baseline costs include the payment in lieu for affordable housing and the tiered approach to a PIL charge per CIL zone, which remain unchanged. Additional and uplifted costs (e.g. for open space) were added to these baseline costs and viability tested, using a range of site typologies.

Affordable Housing SPD

14. The purpose of the Affordable Housing SPD is to set out the council's approach to delivering affordable housing. This SPD applies to all housing development (including new build, change of use, conversions and extensions) with a policy requirement for affordable housing. It provides guidance about how decisions on planning applications will be made.

15. The Affordable Housing SPD will replace the existing Affordable Housing SPD (2008) and draft Affordable Housing SPD (2011).

KEY ISSUES FOR CONSIDERATION

16. The consultation responses have been analysed, and changes have been made to the SPDs where necessary.

17. The main changes have been summarised in the table below for each SPD:

SPD	Changes made	Page number
Householder Development SPD	Added guidance on green infrastructure and biodiversity, as per recommendations from the Biodiversity report set out by the Environment Scrutiny Commission.	Page 14
	Guidance on insulation has been updated to state that non-combustible materials, which conform to building regulations, should be used.	Page 36
	Amendments to the off-street parking guidance, including for hardstanding in front gardens and Vehicle Cross Overs (VCOs). This has been amended to require 2.4m x 6.0m for the vehicle, increasing from the previous guidance and Southwark Streets Design Manual DS.132 standard of 2.4m x 4.8m and 6.0m (where a vehicle space in front of a gateway or access to the property). The guidance has also been updated to state a presumption against vehicle crossovers where the car is required to reverse in or out of the space. These amendments were made following a decision with Cllr McAsh and concern that the lower measurement did not adequately address increased vehicle sizes. Colleagues in highways are considering an update to DS.132 to control VCOs, as the scope of an SPD is limited in this matter.	Page 55 - 57
	Roof extension guidance has been clarified to show that flats and maisonettes are subject to the same	Page 76

	development management controls as houses (unless the home is listed or within a conservation area). This is in line with current development management practice.	
	Roof terrace guidance has been updated to require a privacy balustrade of 1.7m in height. This was previously required at 1.8m but was reduced to be in line with existing development management practice.	Page 81
S106 and CIL SPD	Amendment to Biodiversity Net Gain (if assessed as significant) fee. This has been amended to 'from £12,874' where previously it was set at 'from £6,942'.	Page 23
	Addition of an arboriculture specialist technical fee to reflect the cost of appropriate measures to ensure the long-term health of existing and newly planted trees and that landscaping plans are carried out in line with the approved plans. The fee is £275 for each tree which requires protection, management or maintenance. The fee is based on actual staff costs and reflects the staff time utilised and importance of trees in the borough in relation to greening and biodiversity in new schemes.	Page 22
	Construction and Environment Management Plan fee has been clarified to state there will be a per application fee, plus a fee calculated on a case-by-case basis.	Page 21-22
	The amenity, play space and open space fee has been reduced from £595 to £325, following further research and analysis of comparable rates in other London boroughs. This fee is applied where there is a shortfall in amenity space, child play space or open space.	Page 24
	Additional of note that Environmental Protection Team fees will be considered on a case-by-case basis. This will ensure that the potential impact on air quality and noise issues on communities is mitigated, and this cost is accounted for.	Page 9, 21

	Addition of transport contributions (bus and cycle hire membership) in Phase 1 of Old Kent Road Opportunity Area.	Page 26
	Clarifications made to ensure air quality neutral assessments applies to all developments (with exemptions set out in GLA guidance).	Page 21
Affordable Housing SPD	Minor clarifications throughout the SPD. This includes additional guidance around affordable housing definitions of accepted affordable housing products and the council's approach to fast-track application and service charges.	All
	Added a requirement for full Financial Viability Assessments (FVAs) to be published publicly at the validation stage of a planning application. Previously only a summary was required at this stage and the full FVA was published before a planning committee date.	Section 4.2
	Guidance has been provided on the formula for calculating the payment-in-lieu of affordable housing for purpose-built student housing schemes (PBSA). The SPD has been updated to refer to the formula for conventional housing. This is in line with policy P1 and P5 of the Southwark Plan 2022.	Section 5.1

Consultation

18. In accordance with Southwark's Statement of Community Involvement (SCI), the draft SPDs were made available for comment for 14 weeks, exceeding the minimum of twelve weeks. Additional time was added to the consultation to account for the summer period. The consultation ran from 21st August 2024 until 27th November 2024.

19. The consultation was held on the consultation platform; Citizen Lab. Comments were also accepted by email or post. The council complied with the statutory consultation methods and additional consultation methods as required from the SCI.

20. The responses received on the three SPDs can be summarised as below:

Householder Development SPD

Method of	Type of responder	Total per type	Total responses

consultation		of responder*	
Consultation hub	Residents	33	38
	Planning agents	2	
	Statutory consultee / LPA	1	
	Other / not specified	2	
Email	Residents	4	15
	Planning agents	1	
	Statutory consultee / LPA	5	
	Other / not specified	5	
Total			**53**

S106 and CIL SPD

Method of consultation	Type of responder	Total per responder*	Total responses
Consultation hub	Residents	26	38
	Planning agents / Developers	6	
	Statutory consultee / LPA	3	
	Other / not specified	3	
Email	Residents	1	23
	Planning agents / Developers	12	
	Statutory consultee / LPA	6	
	Other / not specified	4	
Total			**61**

Affordable Housing SPD

Method of consultation	Type of responder	Total per responder*	Total responses
Consultation hub	Residents	18	28
	Planning agents / Developers	5	

	Statutory consultee / LPA	2	
	Other / not specified	3	
Email	Residents	1	15
	Planning agents / Developers	7	
	Statutory consultee / LPA	4	
	Other / not specified	3	
Total			**43**

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

21. The adoption of the three SPDs will have positive equalities impacts as it will improve the quality of the development delivered in the borough and secure a higher standard of living for residents.

22. The Householder Development SPD will support residents in making upgrades and amendments to their homes. This will increase the chance of getting planning permission by setting out what is and is not acceptable development.

23. The S106 and CIL SPD will help to secure planning obligations which ensure development is acceptable in planning terms and delivers benefits to residents.

24. The Affordable Housing SPD will support the delivery of affordable housing in the borough.

Climate change implications

25. The council has declared a Climate Emergency with the ambition to reach carbon neutrality by 2030.

26. The council has also committed to considering the implications on climate change resulting from its decision making, following council assembly on 14 July 2021.

27. Plan-making will contribute to these ambitions through the preparation and implementation of planning policies, specifically in the development management process. Planning applications will be required to meet the policy requirements set out in the Southwark Plan 2022 and the SPDs.

28. This is supported by Southwark's Climate Change Strategy and Climate Change Resilience and Adaptation Strategy which sets out Action Points to meet these targets.

29. The adoption of the S106 and CIL SPD and Householder Development SPD will

promote low carbon heat sources, renewable energy and highly efficient buildings.

30. The SPDs further conform with the Southwark Plan 2022 and do not create any new policies. As such there are no new climate change implications to consider.

Southwark Council
southwark.gov.uk

HOUSEHOLDER DEVELOPMENT

SUPPLEMENTARY PLANNING DOCUMENT (SPD)

JULY 2025

FOREWORD

Over recent years, we have focused in on how to make the planning system more accessible for our residents. The creation of the planning register has made it much easier to search for applications and find associated documents, whilst our digital tools now mean it is much easier to find the policies that apply in each particular circumstance.



With this Householder SPD, we have brought together all of the policies and guidance that might apply to those seeking amendment or extension of their home, into a format which we hope makes things easier to search and understand. This includes information about our climate & environment policies insofar as they apply to existing dwellings and it is our hope through this guidance to encourage homes of the highest design and environmental standards across Southwark.

Councillor Helen Dennis
Cabinet Member for New Homes and Sustainable Development
Southwark Council

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CHAPTER 1

INTRODUCTION

1 INTRODUCTION

This section provides an overview of the Householder Supplementary Planning Document (SPD). It sets out how this guidance should be used and who should be using it. It provides a policy overview and sets out the key things to consider when planning works to existing homes in Southwark.

1.1 Overview

The purpose of this supplementary planning document (SPD) is to set out the standard of design expected from the development of existing homes in Southwark.

The SPD has the following objectives:

- To guide the improvement and adaptation of existing homes
- To ensure a high standard of housing for all, ensuring homes are enjoyable, liveable and accessible.
- To encourage the refurbishment of homes looking to reduce energy demand, carbon emissions and adapt to the effects of climate change.
- To ensure works to existing homes mitigate impact on the amenity, privacy and appearance of the surrounding area and neighbours.
- To encourage sustainable technologies, healthy communities and to preserve Southwark's rich heritage.

1.2 What development does it apply to?

The guidance in this SPD is relevant to all existing homes, whether a house or a flat. The SPD also covers homes which are Listed Buildings or within Conservation Areas. It does not apply to the creation of new homes.

The guidance covers a broad range of works you can consider when looking to improve or extend your home. This includes:

- Improving the appearance of your home
- Improving the thermal performance or energy efficiency of your home
- How to find the most appropriate type of extension for your home
- Whether planning permission or Listed Building Consent is required
- If any specialist information is required to support your planning application

Summary tables have been included at the start of each section to help you quickly see if you need planning permission or Listed Building Consent. Detailed guidance is then provided where relevant.

Is permission required for insulation?

Houses	Flats/Maisonettes	Conservation Area	Listed Buildings
A planning application is not required unless the external appearance of a building is changed.	A planning application is not required unless the external appearance of a building is changed.	A planning application is required for external but not internal insulation.	Listed Building Consent and a planning application are required.

Table 1: Example of a summary table

You must seek your own independent advice before proceeding with any development proposals to ensure it complies with all relevant legal requirements.

1.3 Policy context

This SPD provides guidance for applying the policies in the Southwark Plan 2022. It does not contain new policy. The SPD will be a material consideration in the determination of a planning application.

The Southwark Plan 2022 is the development plan for Southwark. It is in conformity with the broader guidelines and policies set out in the London Plan 2021 and the National Planning Policy Framework (NPPF) 2023.

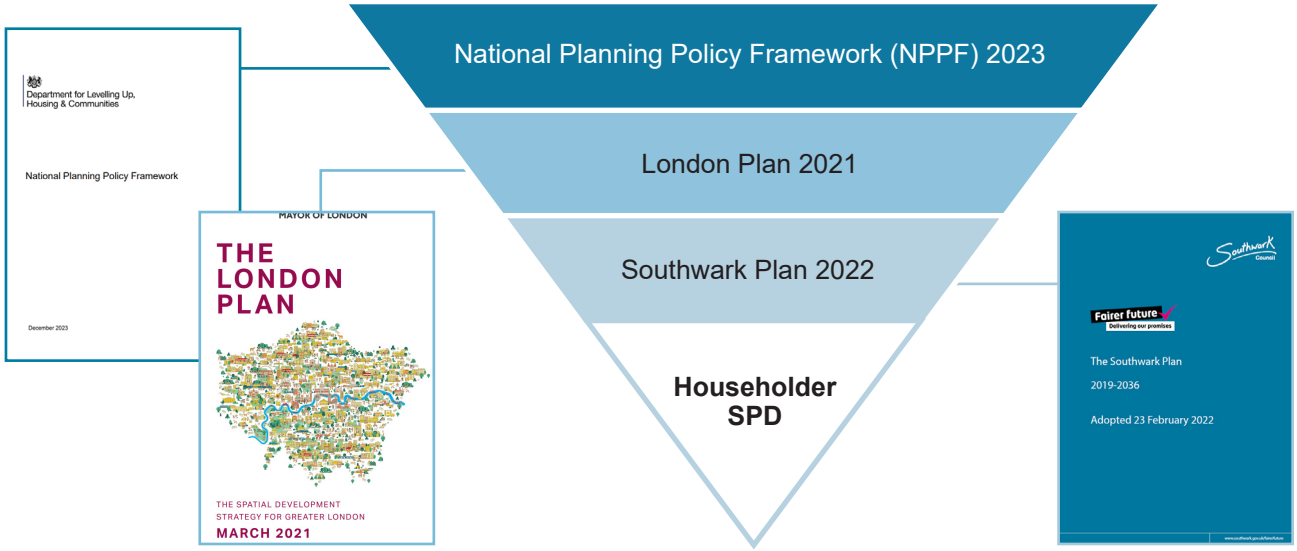


Figure 1: Policy context

1.3.1 National policy

Permitted development

You can carry out certain improvements and extensions without submitting a planning application. This is where planning permission for certain works is already granted by national legislation. This is known as permitted development. These regulations are set out in the General Permitted Development Order 2015 (GDPO).

For example, you may be able to add a large single storey extension to your home under permitted development. This is subject to limitations by the GDPO and only applicable to homes outside of Conservation Areas. You will also need to apply for 'Prior Approval' for these large rear extensions. The council will consult adjacent neighbours to ensure that their amenity would not be harmed by the proposals.

Permitted development does not apply to flats or maisonettes. If you live in a flat (including a house converted into flats) or a maisonette, then you will need to apply for planning permission for external changes.

Permitted development is restricted in Conservation Areas and other areas where the council has issued an Article 4 Direction. These are used to control small-scale changes which may erode the character of an area over time. This could be through the loss or alteration of windows, doors, roofs or front gardens. More information about Article 4 Directions can be found here. You can also check if there are any Article 4 Directions on your property using Southwark Maps.

1.3.2 Local policy

Southwark Plan 2022

The Southwark Plan 2022 contains multiple relevant policies, for which this SPD provides further guidance:

- Policy P13 (design of places) sets out numerous design principles including 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".

- Policy P14 (Design Quality) establishes further principles relating to daylight and sunlight, outlook, response to context, sustainable design, inclusive design, and basements.

- Policy P15 (Residential Design) states that "development must achieve an exemplary standard of residential design".

- Policy P56 (Protection of Amenity) states that "development should not be permitted when it causes an unacceptable loss of amenity to present or future occupiers or users".

- Policy P69 (Sustainability Standards) states that "development must: reduce the risk of overheating, taking into account climate change predictions over the lifetime of the in accordance with prioritised measures set out in the following cooling hierarchy."

- Policy P70 (Energy) states that '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).'

In addition, other policies relating to conservation and heritage, environmental protection, designing out crime, and archaeology may be of relevance.

1.3.3 Exceptional cirumstances

Planning applications should follow the guidance set out in this document; however sometimes exceptional circumstances may prevent this. An example of an exceptional circumstance could be where accessibility adaptations are required to allow a wheelchair user to remain in their home.

Your case officer will assess your planning application on a case-by-case basis. This means they can take account of any exceptional circumstances when reviewing your application.

1.4 Key considerations

There are many factors to consider before planning works to your home. These are detailed in the relevant sections of the SPD and summarised below.

1.4.1 Improving energy and thermal performance

Improving the energy and thermal performance of a home is a key objective for many residents. It aligns with the Southwark Climate Change Strategy which sets out the steps the borough needs to take to be carbon neutral by 2030.

Improving energy and thermal performance can also help to reduce carbon emissions and make your home more resilient to the effects of a changing climate.

Free pre-application advice service

The council offers a free planning advice service for the following works:

- Solar panels
- Heat pump
- External insulation

This is so we can support our residents' transition to low and zero carbon solutions for heating, powering and insulating their homes. This can contribute to reducing energy demand and energy bills.

This service is available to all homeowners, including owners of flats. You can use this service to discuss the proposed works with a planning officer. This can help to resolve any design issues before submitting a planning application.

Reducing carbon emissions

The energy hierarchy on the next page sets out an order of priority for considering carbon reductions. This is underpinned by Southwark Plan (2022) Policy P70 (Energy).

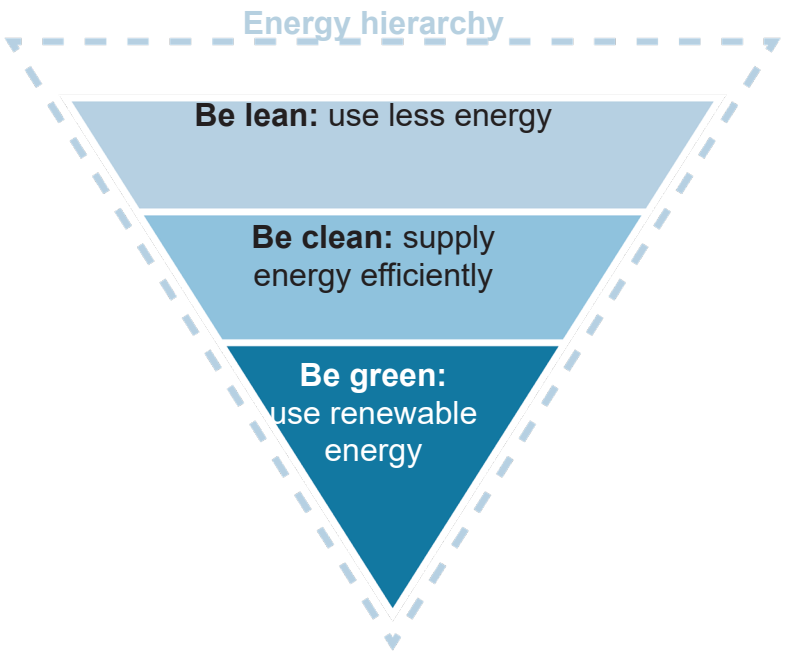


Figure 2: Energy hierarchy

'Be lean' savings should be prioritised and made by using energy efficient design and construction. This encourages a consideration of carbon reduction at the start of a design process. The lifespan of materials used in the works should be considered as well as the potential for natural cooling or heating. This may also include the use of draught proofing or insulation to improve the thermal performance of your home.

The 'be clean' stage encourages the use of a low carbon energy supply such as a heat pump. The 'be green' stage encourages the use of on-site energy production, such as solar panels.

As best practice, the use of low carbon, recycled and re-used materials, as well as recycling any materials removed from the site is encouraged.

Whole Building Approach

We encourage a 'Whole Building Approach' when planning works to your home. This involves considering your whole home when trying to improve energy and thermal performance.

A home performs best when many (or all) parts are functioning, rather than one element. You should consider how different factors such as ventilation, heating and insulation interrelate. This can help to regulate the temperature in your home and make it more resilient to the effects of a changing climate.

The phasing of works needs to be planned to avoid creating other issues such as damp or poor ventilation. This involves the timing of which building element to refurbish – when, how and in which order. For example, the use of insulation will not be as effective if your home is draughty.

A Whole Building Approach should further consider the lifespan of each building element. This should include whether the feature can be repaired, reused or recycled in future. You should also consider the frequency that this must be undertaken. This will help to reduce whole life cycle emissions.

1.4.2 Heritage assets

Additional consideration will need to be given if your home is listed or within a Conservation Area. You can check if your property is listed or within a Conservation Area by using Southwark Maps. Further information can also be found on heritage assets in the Heritage SPD (2021).

Listed Buildings

If your home is listed, Listed Building Consent will be required for most works covered in this SPD. This is often in addition to planning permission but there are works where only Listed Building Consent is required. This has been set out in the relevant sections of this SPD.

You will have to consider the impact your planned works will have on the special interest of your listed home. This is underpinned by the Planning (Listed Buildings and Conservation Areas) Act 1990. Special care needs to be taken to ensure any original or historic fabric is retained in any works. This refers to any original or historic features such as windows or doors as well as walls within your home. Special care also needs to be taken to ensure any planned works do not detract from the external appearance of your home. This is generally of great importance to the character, significance and historic interest of the Listed Building.

You will also need to check whether your home is listed as part of a group of buildings. If so, you will need to consider the impact any works would have on the significance of the wider listed group. Group listing commonly applies to terraced properties. The whole terrace is usually included in the listing as opposed to one individual home. If you home is group listed, you will need to ensure any works maintain consistency across the group and do not introduce features which will detract from the Listed Buildings. You can find out whether your home is group listed in the Listed Building description. The description will refer to your property's address on its own or part of a wider group.

Guidance is provided within each relevant section on how to ensure planned works are appropriate for Listed Buildings. Some works may not be acceptable at all within a Listed Building. Alternative solutions are proposed in these cases.

Conservation Areas

If you live in a Conservation Area, you will need to consider the impact any planned works would have on the wider area.

Works need to be sympathetic to the individual character of the Conservation Area. There may be a dominant style of window or defining feature which is important to the area's character. This character is required to be preserved or enhanced by any proposed works. This is underpinned by the Planning (Listed Buildings and Conservation Areas) Act 1990.

Each Conservation Area has its own Conservation Area Appraisal. The appraisals outline the special importance of the area and its defining character. The appraisals also set out guidance on the type of development allowed in the area. This includes the most common materials and which materials are considered inappropriate.

It is recommended you read the appraisal for your area before planning works. Guidance can change between Conservation Areas as it reflects each area's own character.

1.4.3 Trees

The council has a duty to protect trees under the Town and Country Planning Act 1990. This can be done by placing a Tree Preservation Order (TPO) on the trees.

Trees improve the amenity of an area and have other environmental benefits. They provide landscaping, shading and habitats for biodiversity. Trees improve air quality and enhance climate resilience by reducing the urban heat island effect and surface water flood risk.

You will need to apply for permission to carry out work on protected trees if your proposal could affect trees protected by a TPO or trees in Conservation Areas. You can check if a tree on your property is protected by a TPO or in a Conservation Area by using Southwark Maps.

1.4.4 Green Infrastructure and Biodiversity

When planning works to your home, you may wish to consider how green infrastructure and wildlife friendly features can enhance the biodiversity of the area.

These include (but are not limited to):

- Green walls (which can include trellises with pollinator firendly climbing plants)
- Green roofs
- Flow-through planters
- Planting beds with native shrub and herbaceous species and plants on the Royal Horticultural Society (RHS) Plants for Pollinators list
- Tree Planting
- Insect Houses
- Bat and bird boxes installed within or on a building's wall or on a mature tree to provide a roositing site
- Hedgehog highways (a 13cm x 13cm gap at the bottom of a fence to allow hedgehogs to pass through)
- Wildlife friendly pond (which has at least one gently sloping edge and planted with appropriate native species)
- Water butts to collects rainwater from roofs and stores it for gardening or other tasks.

When designed well, these features can not only enhance biodiversity but provide benefits for nature, the built environment, and physical and mental wellbeing.

Other interventions could include avoiding pesticides or reducing the frequency of mowing.

CHAPTER 2

ENHANCEMENTS AND ALTERATIONS

2 ENHANCEMENT AND ALTERATIONS

2.1 Introduction

This chapter sets out the enhancements and alterations a resident can consider when looking to improve their home. This refers to works which seek to improve the appearance, energy efficiency or thermal performance of your home. There is further guidance on other additions that can be made to your home such as cycle or bin storage.

This chapter also provides guidance on any relevant planning considerations. These could include design quality, impact on neighbours, and impact on heritage assets (such as Listed Buildings and Conservation Areas).

Some enhancements and alterations are permitted development subject to conditions and limitations. This guidance should be read alongside the Permitted Development (Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

2.2 Key considerations

There may be many factors which need to be considered before planning works to your home. This will depend on the type of property you live in and where it is located.

2.2.1 Whole Building Approach

We encourage a 'Whole Building Approach' when planning works to your home. This involves considering your whole home when trying to improve energy and thermal performance.

A home performs best when many (or all) parts are functioning, rather than one element. Piecemeal improvements can result in suboptimal performance and unforeseen issues. This could include increased condensation or mould growth. Certain additions will not be as effective if an existing feature is not working. For examples, heat pumps will not function as well as expected if your windows are draughty.

Figure 3 on the next page demonstrates a Whole Building Approach to improving your home. The approach shows which parts of your home to consider first. This ranges from small fixes such as draught and damp proofing to larger interventions. Often the small fixes can be a simple and cost-effective way to improve the thermal performance and energy efficiency of your home. This can also help make your home more resilient to the effects of a changing climate.

The guidance in this chapter is structured to follow this Whole Building Approach.

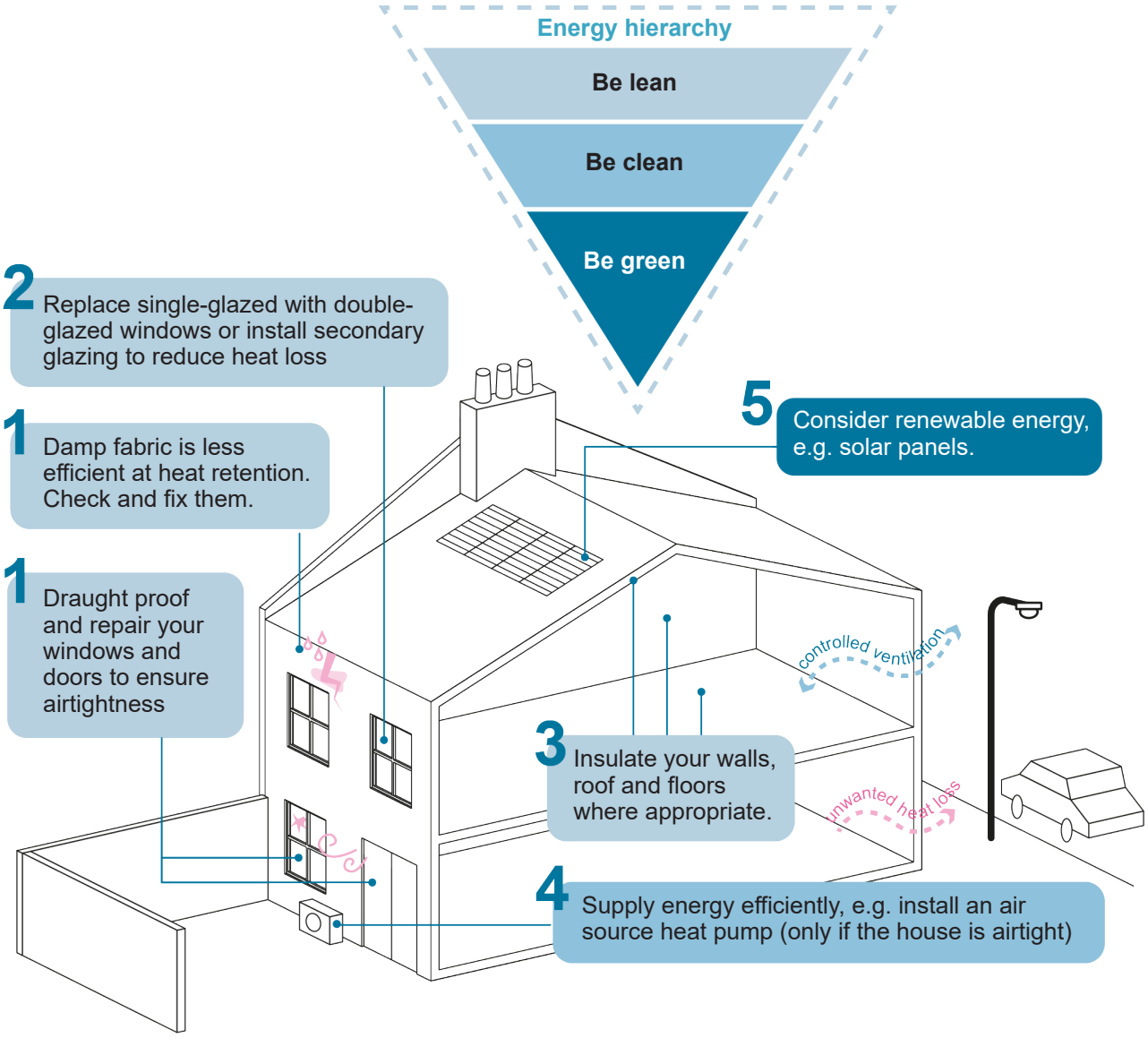


Figure 3: Illustrative diagram of the Whole Building Approach

2.2.2 Heritage assets

Special care needs to be taken when planning improvement works if your home is listed or within a Conservation Area.

The work should not harm the character of your home, or the area and care should be taken to avoid adverse impact on historic features. The works could also risk the long-term deterioration of the building or features.

The aim should be to improve the performance of your home as far as practical. Often, the least disruptive intervention should be sought. For example, insulation could be better placed internally rather than externally. This is because the external appearance of a listed home or Conservation Area is very important. Placing insulation externally may disrupt its character or impact a historic feature such as a brick wall.

Further guidance on energy performance standards in historic buildings is available from Historic England.

2.3 Windows and external doors

Windows and external doors help to keep your home light and secure and are important for ventilation. They also contribute positively to the composition and appearance of your home and help to give a consistent appearance to the surrounding area.

Windows and external doors can generally be the least insulated features of homes, especially as glass within windows transmits the heat and cold easily. Repairing or draught proofing may improve the thermal performance of your windows and external doors without the need for replacements. Repairs can also fix cosmetic issues.

Windows and doors do however have a lifespan and sometimes they will need to be replaced. You may also wish to install new windows or external doors where they have not existed previously.

2.3.1 Draught proofing

Is permission required for draught proofing?

Houses	Flats/Maisonettes	Conservation Area	Listed Buildings
Planning permission is not required.	Planning permission is not required.	Planning permission is not required.	Neither planning permission or Listed Building Consent is required.

Table 2: 'Is permission required for draught proofing?'

Draughts in windows and doors are unwanted gaps which let cold air in and warm air out. Draught-proofing your windows and external doors is a cost-effective intervention to reduce heat loss and keep your home warm. It is also the least intrusive method of improving thermal performance.

Draught proofing can help to regulate the internal temperature during extreme weather events such as heatwaves or cold snaps. This can help make your home more resilient to the effects of a changing climate.

Once implemented, it is likely that less energy will be required for heating your home. Draught proofing can also reduce the amount of dirt and dust entering your home.

It is important to have the right amount of ventilation when considering draught proofing to prevent damp and condensation building up.

You do not need planning permission or Listed Building Consent to draught proof your windows or external doors.

Figure 4 on the next page demonstrates how to find and fix gaps within your home.

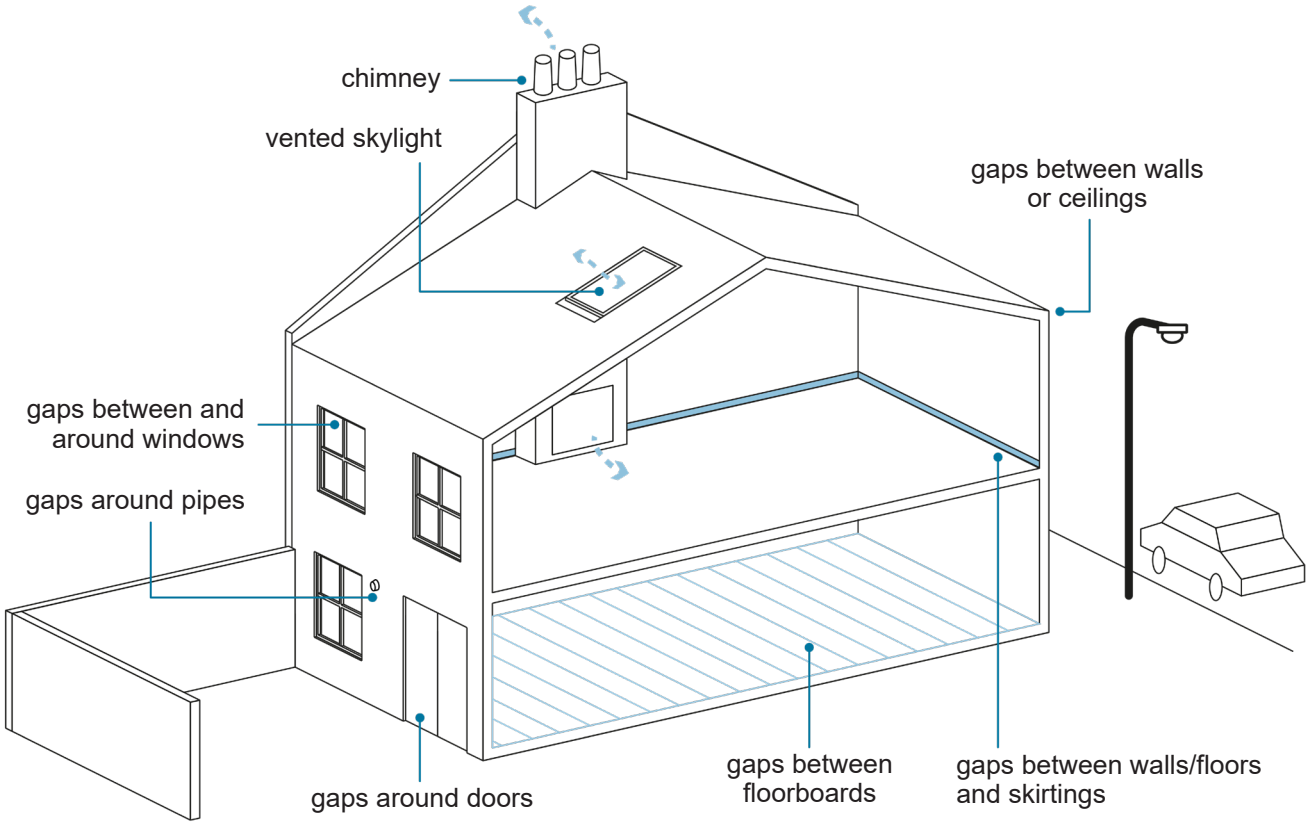


Figure 4: Find and fix gaps

2.3.2 Repair of windows and external doors

Is permission required for repairing existing windows or external doors?

Houses	Flats/Maisonettes	Conservation Area	Listed Buildings
Planning permission is not required.	Planning permission is not required.	Planning permission is not required.	Neither planning permission or Listed Building Consent is required.

Table 3: 'Is permission required for repairing existing windows or external doors?'

Before deciding to replace windows and doors, the option to repair should be considered.

The full replacement of windows and doors may not always be necessary. For example, if there is damage or rot to only one section of a window or door, it may be more cost-effective to repair instead of replacing.

Repair is preferable to replacement for the following reasons:

- Repair is often cheaper.
- Seasoned timber used in older windows or doors is often of higher quality and durability than modern timber.
- Original windows and doors in older buildings can give your home character and improve the appearance overall.
- Repair is more sustainable and reduces carbon emissions associated with manufacturing new replacements.

Examples of repairs to existing windows and doors include:

- Work to maintain and repair the foot of doors and the base of frames where they have suffered rot or other damage.
- Replacing plain panes of glass, where broken, to match the existing.
- Repainting the frames.
- Repairing the seal on double-glazing

You do not need planning permission or Listed Building Consent to repair existing windows or external doors. Further guidance on repairs within Listed Buildings can be found on Historic England's website.

If your windows and doors are beyond repair and require full replacements, please refer to section 2.3.5 for guidance.

2.3.3 Double glazing

You may wish to replace your windows with double-glazed units to improve the thermal performance of your home. Double glazing is a window which has two panes of glass, separated by a sealed gap which reduces heat transfer. Double glazing can provide better insulation for your home as it can prevent cold air entering a room whilst also retaining heat. This can help regulate internal temperatures during extreme weather events (such as heatwaves or cold snaps) and make your home more resilient to the effects of a changing climate.

Other benefits of double glazing include:

- Reduced condensation and mould (from airtight seals)
- Noise reduction (from thicker panes and the air gap in between)
- Heightened security (from thicker panes being harder to break)

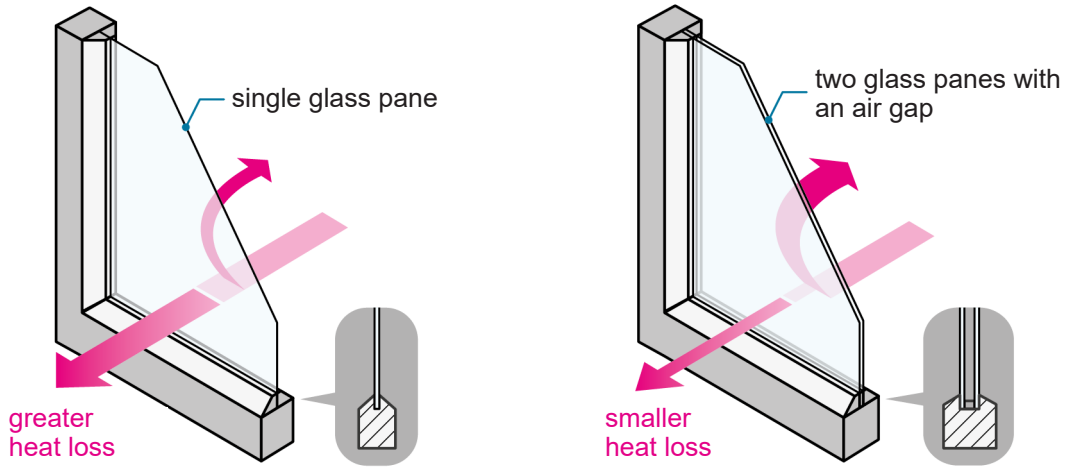


Figure 5: Single glazing compared with double glazing

We **encourage the use of double glazing within most homes in the borough**, given the many benefits. Double glazing is permitted within Conservation Areas; however, the windows need to reflect the character of the area and be of a traditional or sympathetic design and material.

Guidance on how best to replace your windows and whether planning permission is required is detailed in section 2.3.5.

Listed Buildings

Double glazing will not typically be permitted in Listed Buildings, including slim versions. It may be replaced if double glazing has been permitted in the past or part of the original build.

This is in line with Historic England's 'Adapting Historic Buildings for Energy and Carbon Efficiency' guidance which encourages the retention and repair of historic features such as windows.

The use of double glazing is considered harmful to Listed Buildings. It often involves the removal of historic and original windows and introduces modern features which are not authentic or compatible. Most Listed Buildings in the borough are historic, dating from the Victorian or Georgian period. By contrast, double glazing is an inherently modern feature which is not usually seen as sympathetic or in keeping with the age and character of our Listed Buildings.

It can often be three times the thickness of the existing single glazed windows. This would disrupt the historic detailing of a Listed Building and alter its appearance and overall character. Many of the listed homes within the borough are also in groups or terraces where single glazing is retained across all the buildings. The introduction of double glazing here can disrupt the uniformity of these listed terraces or groups

We are aware of the need to improve the thermal performance of listed homes, and to address climate emergency and the Southwark Climate Change Strategy. However, Listed Buildings only account for around 2% of all buildings in Southwark. Once lost, historic or original windows are irreplaceable.

There are also other ways to improve the thermal efficiency of Listed Buildings. This could involve secondary glazing (sections 2.3.4) or internal insulation (section 2.4.1-2.4.2). Existing windows within Listed Buildings can also be draught proofed (section 2.3.1) or repaired (section 2.3.2).

2.3.4 Secondary glazing

Is permission required for installing secondary glazing?

Houses	Flats/Maisonettes	Conservation Area	Listed Buildings
Planning permission is not required.	Planning permission is not required.	Planning permission is not required.	Listed Building Consent is required, but not planning permission.

Table 4: 'Is permission required for installing secondary glazing?'

Secondary glazing is different to double glazing in that the existing window remains unaltered. It involves the installation of a separate internal window on the inside of the existing window. This replicates the airtight seal and insulation gap offered by double glazing. Secondary glazing can offer the same benefits of double glazing. This includes increased insulation and noise reduction.

Secondary glazing can be installed to replicate the existing arrangement of the window. It can also be fixed shut or installed with a horizontal or vertical opening. Keeping the secondary glazing openable allows access to the existing window so it can still be opened, cleaned and maintained. Secondary glazing can also be designed to be removable in warmer months when extra insulation is not needed.

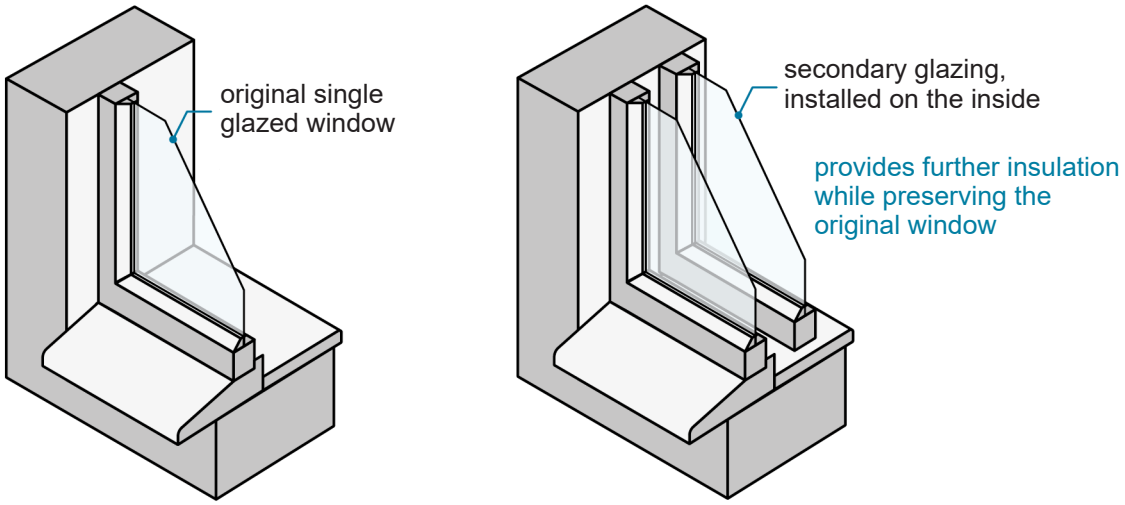


Figure 6: Secondary glazing

The use of secondary glazing is a useful approach within Listed Buildings, where double glazing is not permitted. Secondary glazing provides similar benefits of double glazing without having to replace historic or original windows. This better preserves the character of your home.

You do not need planning permission for the installation of secondary glazing. Listed Building Consent will however be required if your home is listed.

2.3.5 New or replacement windows or external doors

Is permission required for new or replacement windows or external doors?

Houses	Flats/Maisonettes	Conservation Area	Listed Buildings
Planning permission is generally not required unless the proposal falls within the list of exceptions of permitted development.	Planning permission is generally not required if the windows or external doors are like-for-like replacements. External doors refer to the door which accesses the street or outside area. New windows or external doors will require planning permission.	Planning permission is generally not required if the windows or doors are like-for-like replacements. Planning permission is not generally required for new windows or external doors, unless an Article 4 Direction is in force.	Listed Building Consent will be required as well as planning permission in some circumstances.

Table 5: 'Is permission required for new or replacement windows or external doors?'

Refer to section 3.6 in Chapter 3 for guidance on new or replacement dormer windows.

Houses

You do not generally need planning permission for new or replacement windows or external doors within houses as the works are permitted development. Different requirements and restrictions apply if your home is listed or within a Conservation Area. You will also need to apply for Listed Building for works to a listed home. This guidance is provided in the next sections.

Planning permission is not required if the new or replacement windows or external doors are similar in appearance to the existing at your home. Planning permission will be required if the appearance of your home will be noticeably changed.

A similar in appearance window or external door should keep the dimensions and overall arrangement of the existing. The material, colour and glazing type may change. Fact box 1 provides further examples of similar in appearance windows and doors.

Planning permission will also be required if any of the following applies:

- The new window(s) is for an upper floor on the side of your house (including the roof slope) and would be clear- glazed. Windows which are obscured glazed in this position do not need planning permission.

- The new window(s) is for an upper floor on the side of your house (including the roof slope) and is openable at a level less than 1.7m above the floor of the room in which it is installed.

- Permitted development rights have been removed by an Article 4 Direction or a condition attached to an earlier planning permission restricting the use of windows or doors.

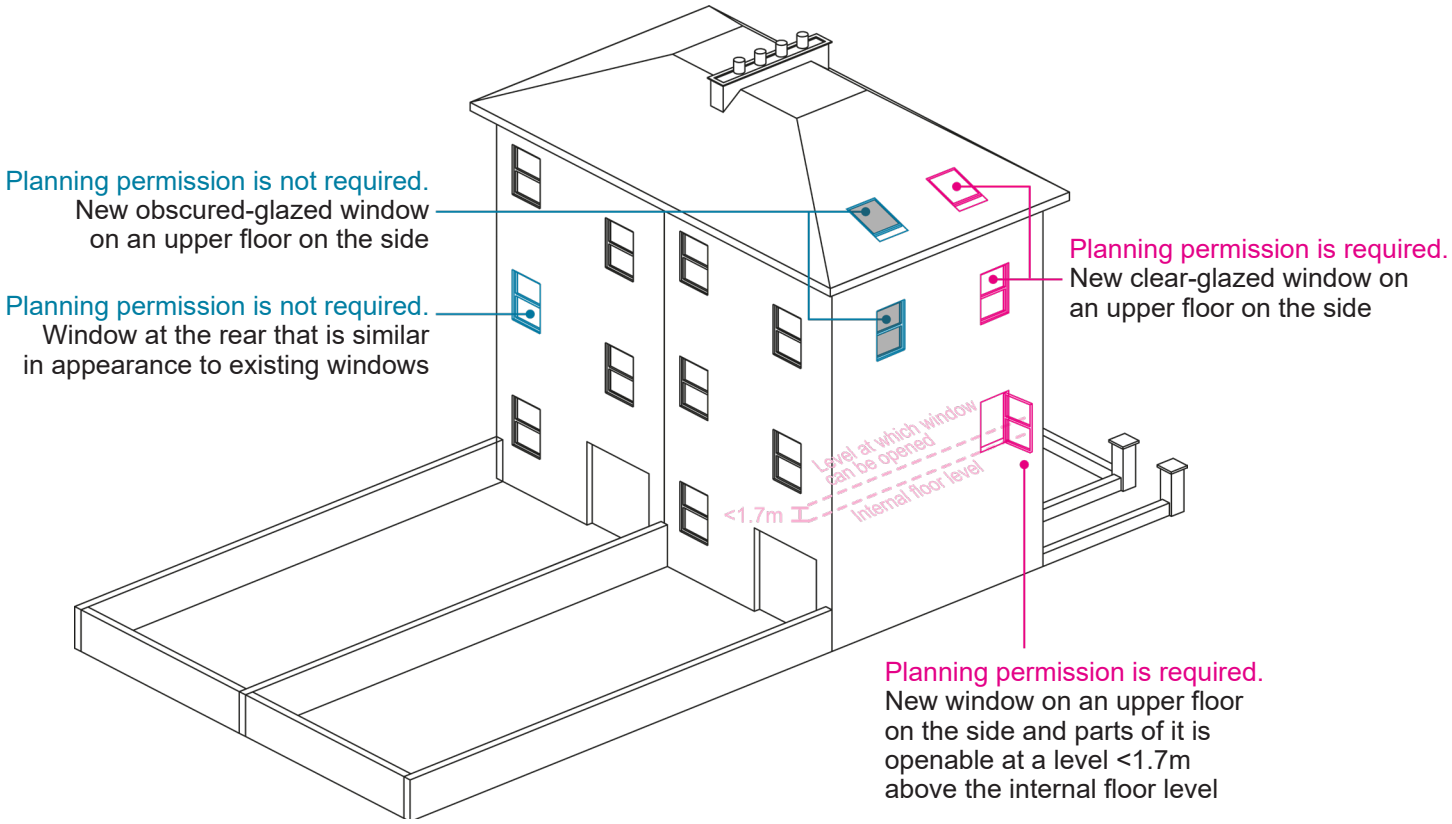


Figure 7: Permitted development right for new or replacement windows

Flats and maisonettes

> External doors refer to the door which accesses the street or the outside area of your building.

Planning permission is not required for like-for-like replacement windows or external door(s). The replacements would have to be the same material, size and design to be like-for-like. The glazing type can be changed. This means you can change from single to double glazing and still be considered like-for-like. Fact box 1 provides further examples of what is a like-for-like replacement.

Planning permission will be required for new windows or external doors or for replacements which are not like-for-like.

Different requirements and restrictions apply if your home is listed or within a Conservation Area. You will also need to apply for Listed Building for works to a listed home. This guidance is provided in the next sections.

Care should be taken to ensure any new or replacement windows or doors are sympathetic to the existing windows at the property. This is to ensure consistency across all the flats or maisonettes within a block.

If you are a leaseholder, you may also need to gain permission from the freeholder of the site before being able to carry out the works. The freeholder may also have their own requirements and restrictions on works.

Conservation Areas

Planning permission is not required if the replacement windows or external doors are like-for-like. The replacements would have to be the same material, size and design to be like-for-like. The glazing type can be changed. This means you can change from single to double glazing and still be considered like-for-like. Fact box 1 provides further examples of what is a like-for-like replacement.

Planning permission will be required for new windows or external doors or for replacements which are not like-for-like.

Original or historic windows or doors should be repaired where possible. This can often be cheaper than replacement, given the high quality and durability of older timber. More guidance on repairing windows and doors is provided in section 2.3.2.

Where replacements are required or new windows or doors are to be added, the historic importance and character of the Conservation Area should be considered. The windows or doors would need to be in a style and material which is sympathetic to the area and maintain or improves its overall appearance. Detailed assessments of the importance and character of each Conservation Area can be found within the area appraisals.

Generally, we require the use of traditional materials such as timber within Conservation Areas. Traditional materials tend to last longer than modern substitutes, giving better value and being more sustainable over time. Metal windows or doors will be permitted in certain areas. However, this is generally only to the rear or non-public facing elevations. Windows and doors should also be painted in traditional colours. Windows are generally expected to be off-white. However, doors can be painted in a broader range of heritage colours such as navy, maroon, dark green or black.

i Guidance can change between Conservation Areas, and it is recommended you read the appraisal for your area before planning works as this will state which materials and colours are acceptable.

UPVC (Unplasticized Polyvinyl Chloride) will not be permitted in any of our Conservation Areas, even to the rear of a property. UPVC generally appears out of place in Conservation Areas, owing to the plastic appearance. UPVC also may weather or behave differently from natural and more traditional materials. The replacement of UPVC windows or doors with more sympathetic, traditional materials is encouraged.

New or replacement windows or doors must maintain the quality of design at your home. Features such as the depth of reveal should be retained (see Figure 8). Doors should be of traditional design, generally panelled or boarded. These should be a painted timber rather than stained hardwood. Modern designs such as metal framed, or sliding may be acceptable in places.

There should also be a continuation of the established hierarchy of windows at your home. Generally, windows are larger or more ornate at the lower levels of a house, reducing in size and decoration on the upper levels (see Figure 9). This should be respected with any new or replacement window. Overly large windows will not be permitted at the upper levels of properties, even to the rear.

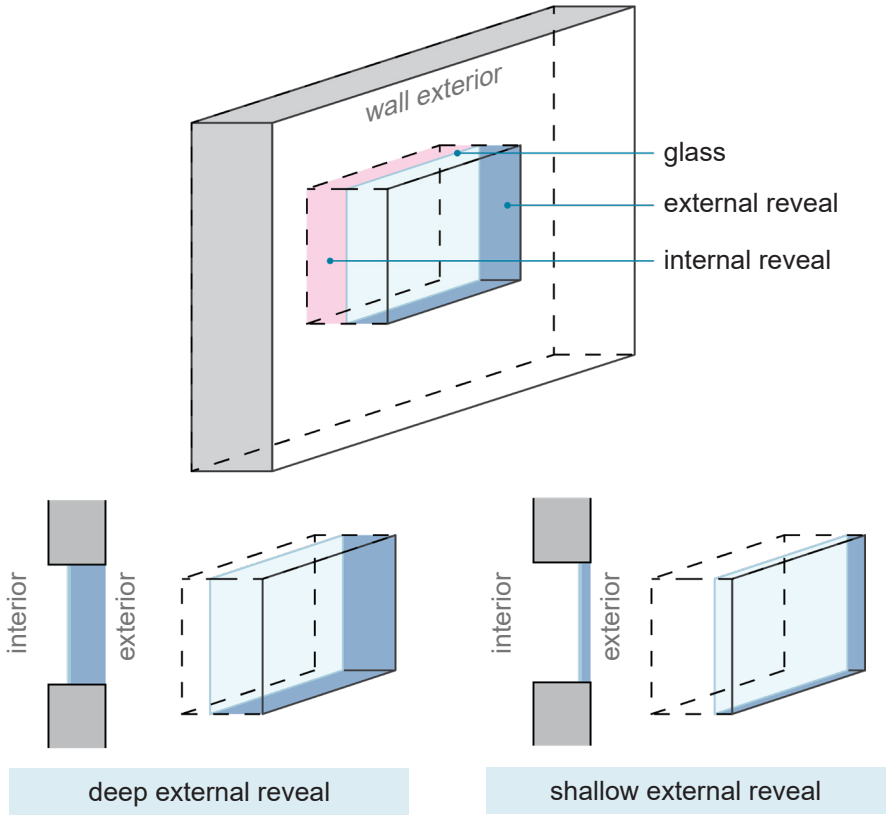


Figure 8: Depth of reveal

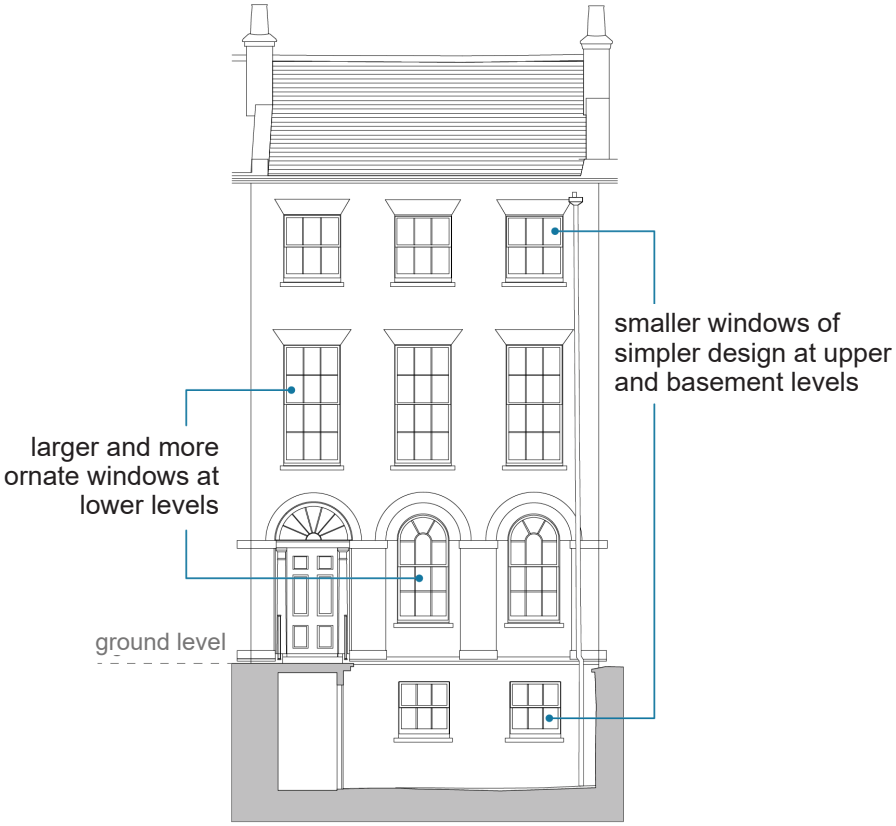


Figure 9: Typical window fenestration

Listed Buildings

Listed Building Consent is required for any new or replacement windows or doors within Listed Buildings. This applies to both internal and external doors at your home.

Replacement windows or doors

Replacement windows or doors would need to be like-for-like with the existing at your home. The replacements would have to near replicas of the existing windows and doors. The glazing type would also have to remain the same. Double glazing is not permitted in Listed Buildings. It may be replaced if double glazing has been permitted in the past or part of the original build. Fact box 1 provides further examples of what is a like-for-like replacement.

The replacement of windows or doors within Listed Buildings will not be permitted unless it can be demonstrated that the existing versions are beyond their lifespan, and it is not economically viable to pursue repairs. Modern windows or doors of unsympathetic design and materials can be replaced with an appropriate alternative.

Original or historic windows or doors should be repaired where possible. This is often a cheaper cost than replacement, given the high quality and durability of older timber. Repairing windows or doors in Listed Buildings can also better insulate your home. For example, a full repair of a sash window could include the restoration of its frame, a rehanging of the internal counterweights and the installation of draught seals. Such repairs can reduce draughts and improve the thermal performance of your home. It also ensures original or historic features are preserved. More guidance on repairing windows and doors is provided in section 2.3.2.

You will need to include a condition survey as part of a Listed Building Consent application to replace your windows or doors. It is required to justify replacement instead of repair. It should include a breakdown of the status and photographs of each individual window or door proposed to be replaced.

Creation of new windows or doors

You may be able to create new window or door openings in your home, provided it does not cause harm to the significance of the Listed Building.

The installation of a new window or door will generally involve the removal of a section of wall to create a new opening. Consideration must be given to the location of any new window or door and the impact this will have on the significance of the Listed Building.

Any new window should continue the established hierarchy of windows at your home and be in keeping with the style and design of existing windows. Overly large windows or doors or those in an unsympathetic material or design will not be permitted, even to the rear. Exceptions may be made when new doors or windows are proposed as part of new extensions.

General considerations

UPVC (Unplasticized Polyvinyl Chloride) will not be permitted in Listed Buildings, even to the rear of a property. UPVC cannot match the sections and proportions of historic joinery and cannot replicate the appearance of traditional materials. If UPVC windows or doors have been installed in the past, their replacement with more traditional materials is encouraged.

New or replacement windows or doors must maintain the same design quality as the existing versions. Features such as the depth of reveal, sympathetic materials and glazing pattern should therefore be retained (see Figure 8).

You will also need to check whether your home is listed as part of a group of buildings. If so, you will need to consider the impact any works would have on the significance of the wider listed group. You can find out whether your home is group listed in the Listed Building description. The description will refer to your property's address on its own or part of a wider group.

i

Fact box 1: What is considered 'similar in appearance' and 'like-for-like'?

A new or replacement window or door is considered 'similar in appearance' if it follows the arrangement and dimensions of the existing. The glazing bar pattern, material, colour and glazing type may be changed.

A 'like-for-like' replacement is a window or door which matches the arrangement, glazing bar pattern, dimensions, material, and in some cases, colour of the existing. The glazing type does not need to be retained unless it is for a Listed Building. A like-for-like replacement is important to ensure any new window or door retains the character and appearance of a home.



Figure 10: Window components

Arrangement
Arrangement refers to the glazing bar pattern or style of glass panes in a window or door.



Figure 11: Defining 'arrangement' and 'glazing bar pattern'

Similar in appearance	Like-for-like
To be considered 'similar in appearance' the overall arrangement and style must be retained. For example, a large single pane casement window can be split into two and still be considered 'similar in appearance'. However, if you wanted to replace a rectangular casement window with a circular window then it would not be considered similar in appearance. The arrangement should also broadly match the other existing windows or doors at the property. For example, if you are replacing one window at the front of your property then the replacement would be expected to be consistent with the other windows at this elevation.	To be considered 'like-for-like' the overall arrangement would have to replicate the existing window or doors at your home.

Material

Similar in appearance	Like-for-like
The material of a replacement window or door does not need to match the existing to be considered 'similar in appearance'. For example, an aluminium door can be used to replace a UVPC door if the overall arrangement and dimensions are retained.	A like-for-like replacement would be expected to be the exact same material as the existing. For example, a timber window or door cannot be replaced with an aluminium or UVPC replacement as this constitutes a change in the material. Even if all other elements of the window or door such as the arrangement or colour are replicated, the material must also be the same as the existing. This also includes windows or doors finished to look like other materials (i.e., a UVPC replacement finished to look like timber). A change in material will be permitted if the new material is an enhancement over the original. For example, a UVPC window or door will be permitted to change to a timber version (especially in a Conservation Area or Listed Building) as this material is of a higher design quality.

Dimensions



Figure 12: Window dimensions

Similar in appearance	Like-for-like
A replacement window or door is not considered to be similar in appearance if it increases or decreases the existing opening. Replacement windows and doors should be the same size as the existing. Planning permission will be required if the existing window or door opening is being extended or reduced.	A replacement window or door is not considered to be a like-for-like replacement if it increases or decreases the existing opening. Replacement windows or doors should be the same size as the existing.

Colour

Similar in appearance	Like-for-like
The colour of a replacement window or door does not need to match the existing to be considered 'similar in appearance', however it does need to be in line with the other windows or doors at your property.	If the colour of an existing window or door contributes to the significance of a Listed Building or surrounding Conservation Area, then it should be replicated on any replacement. For example, if most windows within a Listed Building or Conservation Area are off cream then any replacement window should be off cream also. If there is no common colour of windows or doors within a Conservation Area, then any other heritage colours would be considered appropriate.

Glazing type

Similar in appearance	Like-for-like
The glazing type refers to whether a window or door is single or double glazed. The glazing type does not need to be retained to be considered similar in appearance. For example, a single glazed window can be replaced with a double-glazed window if it is considered similar in appearance in all other respects.	The glazing type refers to whether a window or door is single or double glazed. Unless the building is listed, the glazing type does not need to be retained to be considered 'like-for-like'. For example, a house within a Conservation Area could replace a single glazed window with a double-glazed version if it is considered like-for-like in all other respects.

2.4 Insulation

Is permission required for insulation?

Houses	Flats/Maisonettes	Conservation Area	Listed Buildings
Planning permission is not required unless the external appearance of a building is changed.	Planning permission is not required unless the external appearance of a building is changed.	Planning permission is required for external but not internal insulation.	Listed Building Consent and planning permission are required.

Table 6: 'Is permission required for insulation?

Insulation is one of the best ways to improve the thermal performance of your home. It can protect your home from excessively hot or cold temperatures. This can help to make your home more resilient to the effects of a changing climate. Insulation can also reduce noise pollution.

Insulation is a general term to describe products which reduce heat loss or gain by providing a barrier between areas that are very different in temperature. Common insulation materials used in homes include fiberglass, spray foam, injection foam, cellulose and mineral wool – each with its own pros and cons. More sustainable materials such as hemp or rock wool are also available and are encouraged. Consideration should be given to the U-value of a product. The lower the value, the better the material as a thermal insulator. An insulation material should also be fireproof to conform with building regulations and limit the surface spread of fire.

Before any insulation, pre-existing issues with damp or condensation should be addressed. Otherwise, these issues may worsen.

For homes in Conservation Areas or that are listed, care should be taken to provide enough (controlled) ventilation and allow moisture to escape. Insulation materials which are compatible with traditional permeable construction (such as wool) are preferred.

A qualified insulation expert can advise on the best solution for your home. Building Control certification may also be needed for certain types of insulation.

We encourage a 'Whole Building Approach' to insulation. This means that all rooms in your home are considered, not just the ones which are the coldest or warmest. Proposals for insulation will be assessed on a case-by-case basis when a property is listed or located within a Conservation Area. You should consider the least disruptive method possible and provide robust justification for any harm expected to be caused.

2.4.1 Roof and loft insulation

Roof insulation can be carried out internally or externally depending on the roof type or whether the building is listed or within a Conservation Area. Flat roofs should be insulated externally where possible. Such reduces the risk of moisture building up which can lead to structural damage. Internal insulation is best suited to other roof forms such as hip or gabled. It minimises disruption to the roof which could be covered in tiles or shingles.

The two common methods of roof or loft insulation are 'warm roof' or 'cold roof'. Warm roofs fit the insulation to follow the slope of the roof and is best suited to habitable spaces. Cold roofs fit the insulation on top of the ceiling of the room below. It is usually carried out by laying materials between or over the joists. A cold roof insulation is best suited when the loft space is not actively used.

Any roof or loft insulation needs to be carried out by a qualified expert, who can advise on the best solution for your home.

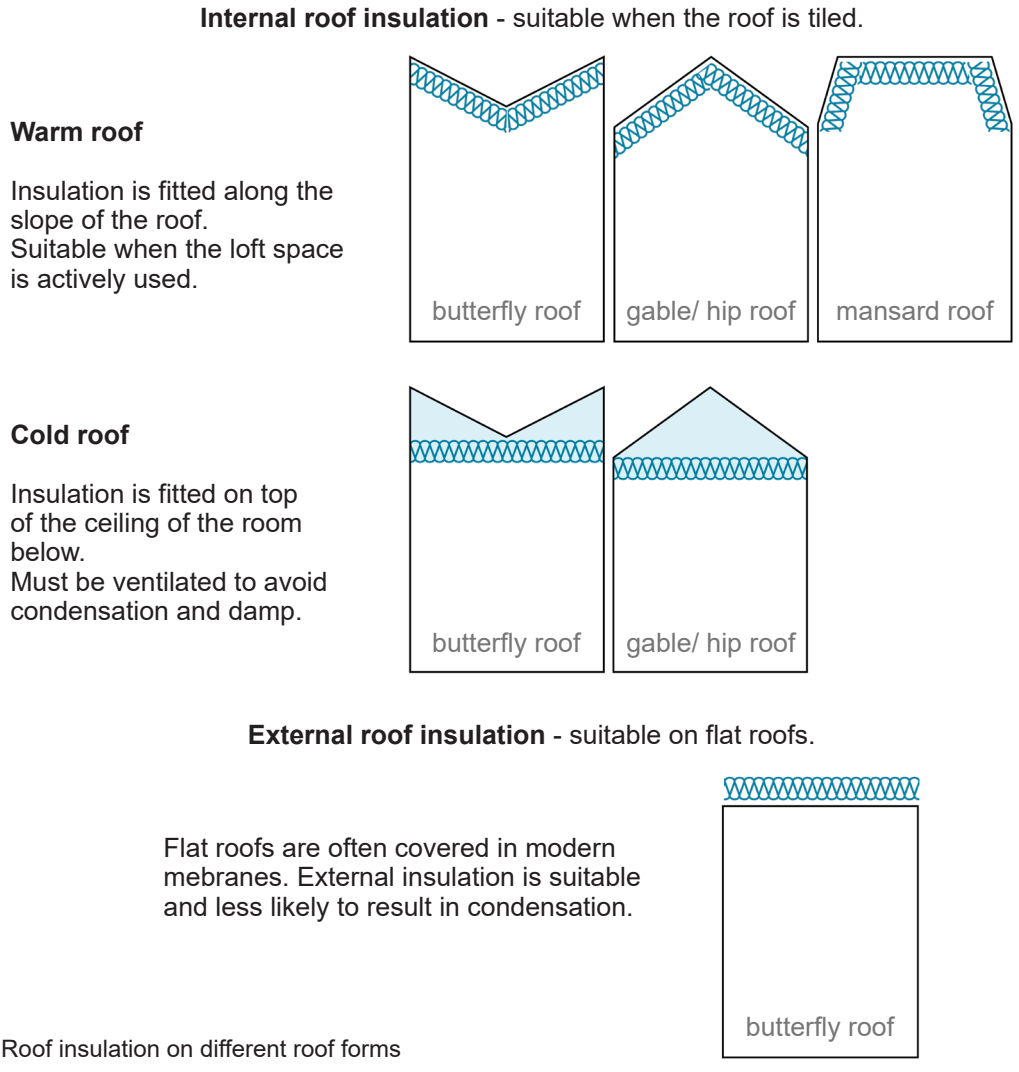


Figure 13: Roof insulation on different roof forms

Houses, flats and maisonettes

Planning permission is not required for internal roof or loft insulation. External roof insulation will not require planning permission unless the appearance of your home is changed. For example, a different finishing material will be applied to the roof, or the roof will increase in size.

Different requirements apply to Listed Buildings and Conservation Areas. They are detailed in the subsequent sections.

If you are a leaseholder, you may also need to gain permission from the freeholder of the site before being able to carry out the works. The freeholder may also have their own requirements and restrictions on works.

Conservation Areas

Planning permission is not required for internal roof or loft insulation within Conservation Areas.

External roof insulation will need planning permission. It is encouraged to use a finish which matches the existing roof materials. The use of inappropriate material such as UPVC will not be permitted.

Listed Buildings

Planning permission and Listed Building Consent will be required for external roof or loft insulation.

Internal roof or loft insulation may be permitted in Listed Buildings if there is no harm to significant roof features such as original rafters or beams. Spray foam insulation, in particularly, is considered harmful and will unlikely be permitted. It could increase the risk of condensation and decay. The foam sticks to the timbers and underside of the roof or tiles. This makes repairs in the future difficult. It is also a permanent installation, and its removal could potentially damage the historic structure.

It is unlikely that external roof insulation will be permitted. The nature of the process would undoubtedly cause harm to the significance and character of the Listed Building. External works to roofs will only be considered when it can be demonstrated that the existing roof is beyond its lifespan and no longer functional.

2.4.2 Internal insulation

Internal insulation is generally carried out by insulating the internal or cavity walls at your home. Most homes constructed after 1920s are likely to have cavity walls, which is a wall with a hollow centre. Older homes are likely to have been built with solid walls. The appropriate method of internal insulation will depend on your wall type. Your home may also already have wall insulation, especially if it is a modern property.

Cavity wall insulation is carried out by injecting insulating materials into the gap in the middle of the wall. However, this may not be possible if the gap is too narrow. Internal wall insulation is carried out by fitting insulating boards to the inside face of your walls, or by building a stud wall and filling it with insulating materials. Internal insulation can vary in thickness. It may be disruptive to the internal appearance of your home as features such as door frames or skirting boards may need to be removed and reattached.

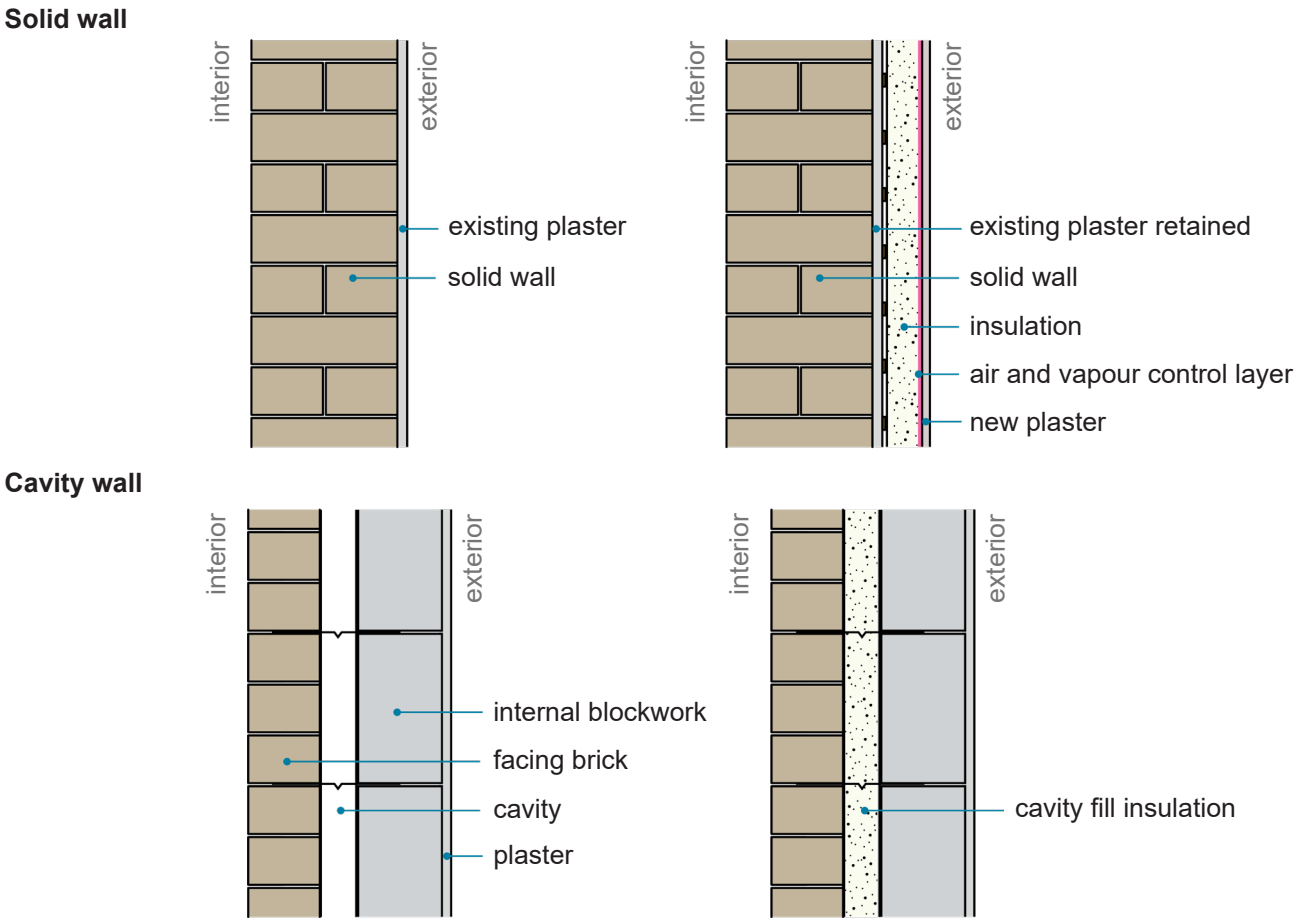


Figure 14: Solid wall and cavity wall insulation

Any internal insulation needs to be carried out by a qualified expert, who can advise on the best solution for your home.

Houses, flats and maisonettes

Planning permission will not be required for any internal insulation in a house, flat or maisonette. Different requirements apply to Listed Buildings, set out in the section below.

If you are a leaseholder, then you may also need to gain permission from the freeholder of the site before being able to carry out the works. The freeholder may also have their own requirements and restrictions on works.

Conservation Areas

Planning permission is not required for any internal insulation in a house, flat or maisonette. Different requirements apply to Listed Buildings, set out in the next section.

Internal insulation is encouraged within Conservation Areas as it does not impact the external façade of your home and preserves the character and appearance of the area.

Listed Buildings

Listed Building Consent is required for any type of internal insulation in Listed Buildings.

The interiors of Listed Buildings are often of great significance. They contain features of architectural or historic interests. Examples include fireplaces, staircases, doors, windows, skirtings and cornices.

We will not permit internal insulation within a Listed Building if it causes harm to original walls or covers any features of significance.

2.4.3. External insulation

i We offer a free pre-application advice service for installing external insulation at your home. You can use this service to discuss the works with a planning officer. This could help resolve any planning policy or design issues before you make your application.

External insulation is generally carried out by cladding your home in a layer of insulation and covering it with a thin render or plaster finish. Brick slips can also be used as a finishing material in certain circumstances.

External insulation is suitable for homes which have an existing render or plaster finish as this appearance can be easily replicated. It also suits homes with solid walls or limited internal floorspace which makes internal insulation challenging. External insulation will likely require pipework and plumbing to be removed and reattached. Window sills will also need to be extended to ensure water runoff is maintained.

Any external insulation needs to be carried out by a qualified expert, who can advise on the best solution for your home.

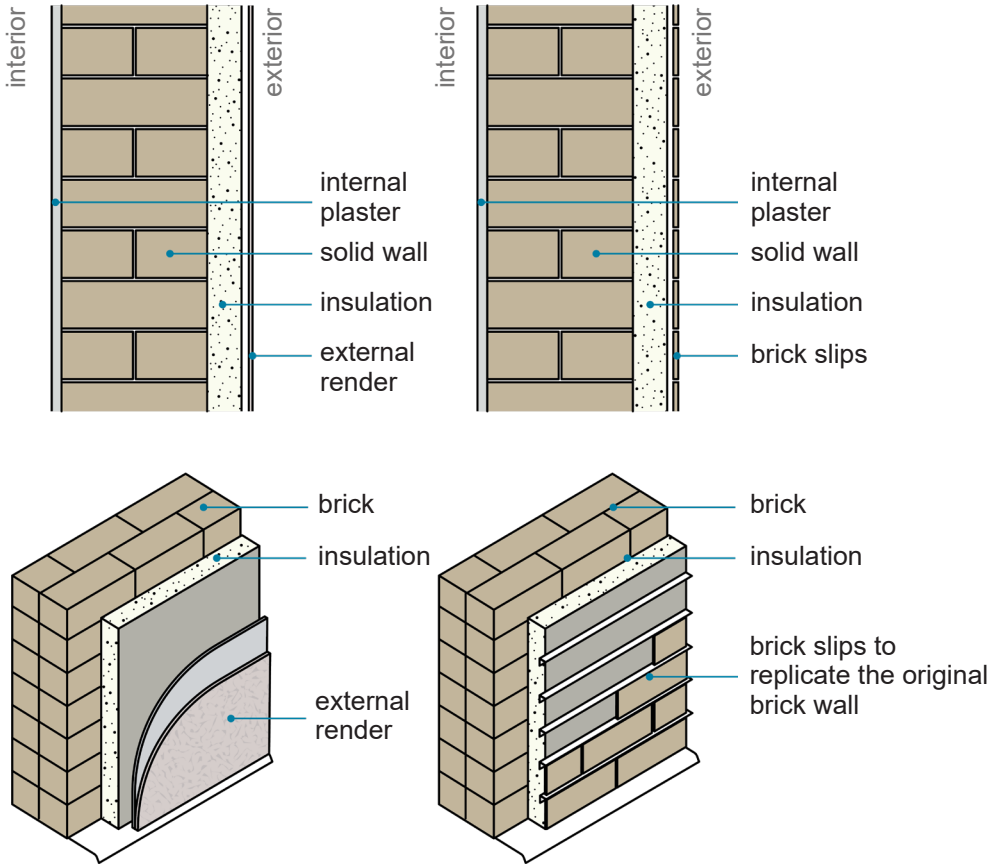


Figure 15: External insulation in render and brick slips

Houses, flats and maisonettes

Planning permission will not be required for any external insulation in a house, flat or maisonette unless the external appearance of your home is changed. For example, planning permission will be required if your home is currently finished in brick but the external insulation will result in a render finish. However, if your home is currently finished in render, no planning permission will be required as the external appearance has remained the same.

Different requirements apply to Listed Buildings and Conservation Areas, set out in the next sections.

If you are a leaseholder, then you may also need to gain permission from the freeholder of the site before being able to carry out the works. The freeholder may also have their own requirements and restrictions on works.

Conservation Areas

You will need planning permission for external insulation within Conservation Areas.

The external appearance of these homes contributes to the historic importance and character of the Conservation Area.

External insulation will not be permitted where the appearance of the building changes. This includes a change in external material or loss of key features. For example, a render finish would not be suitable at a home which is currently finished in brick. This changes the appearance of the building and lessens the design quality of the area.

External insulation is best placed on facades which are already rendered. It may also be acceptable on less visible or rear facades.

Listed Buildings

You will need Listed Building Consent for external insulation. It is unlikely however that external insulation will be permitted.

The external appearance of a listed home is often of great significance and historic interest. Example features include original windows, doors or brickwork. External insulation will cover up such features and harm the significance and character of the building as a result.

As such, other forms of insulation should be considered.

2.5 Air source heat pumps

Is permission required for installing air source heat pumps?

Houses	Flats/Maisonettes	Conservation Area	Listed Buildings
Planning permission is not generally required unless the proposal falls within the list of exceptions of permitted development.	Planning permission is not generally required unless the proposal falls within the list of exceptions of permitted development.	Planning permission is not generally required unless the proposal falls within the list of exceptions of permitted development.	Planning permission and Listed Building Consent are required.

Table 7: 'Is permission required for installing air source heat pumps?'

> *i* We offer a free pre-application advice service for installing air source heat pumps at your home. You can use this service to discuss the works with a planning officer. This could help resolve any planning policy or design issues before you make your application.

Heat pumps run on electricity to provide heating and hot water. The use of heat pumps as opposed to gas boilers can reduce the cost of your heating bills and reduce your carbon footprint.

Heat pumps are only suitable if your home uses radiators or underfloor heating as its main source of heating. Your home will also need to be airtight and well insulated otherwise the heat pump will not be able to operate efficiently and may become very costly to use. You will also need enough space to fit the heat pump units.

There are two common types of heat pumps:

- Ground source heat pump: Pipes are placed under ground. It is only suitable if you have a garden or large outdoor space suitable for digging.

- Air source heat pump (ASHP): The heat pump units are placed above ground. It is suitable if you have sufficient external space to fit the unit(s) and for it to have the necessary amount of open air to function efficiently.

This guidance covers ASHPs only.

ASHPs can be very noisy. They need to be placed at least 1m from the site boundary to limit disruption to adjoining neighbours. The minimum distance may have to increase depending on the layout of your home and proximity to neighbours. Acoustic screens could be installed to reduce noise impact. The cold air discharged from air source heat pumps should not be fed into communal or actively used space.

The ASHP should also be sited sufficiently distanced from any tree root protection areas.

An ASHP should be located to the rear of your home or in areas which already have a service character, away from the principal elevations of the property. It may also be located on the roof of your home. In on the roof, it will need to be set back from the roof edge or preferably behind a parapet to minimise visual impact. ASHPs should be screened with greenery, fencing or an alternative appropriate enclosure where practical.

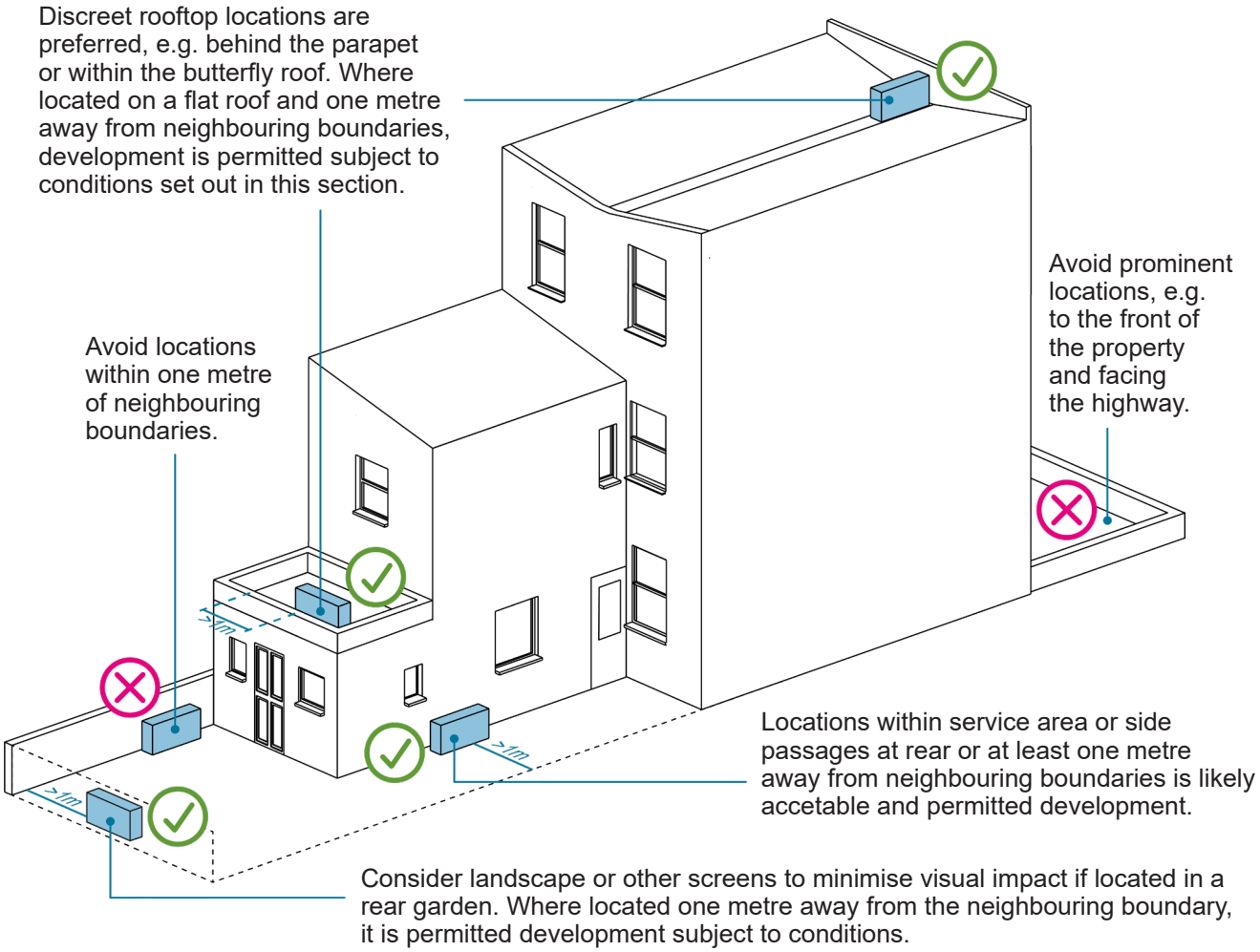


Figure 16: Siting an ASHP

You should consult the relevant experts for the best solution for your home.

Houses, flats and maisonettes or homes within Conservation Areas

The installation of ASHPs is permitted development within houses, flats, maisonettes and homes within Conservation Areas, subject to the following limits:

- Development is permitted only if the ASHP installation complies with the Microgeneration Certification Scheme Planning Standards (MCS 020) or equivalent standards.
- The volume of the ASHP's outdoor compressor unit (including housing) must not exceed 0.6 cubic metres.
- Only the first installation of an ASHP would be permitted development. Additional ASHPs at the same property requires an application for planning permission.
- All parts of the ASHP must be at least one metre from the property boundary.

- Installations on pitched roofs are not permitted development. If installed on a flat roof all parts of the ASHP must be at least one metre from the external edge of that roof.
- Permitted development rights do not apply for installations within the curtilage of a Listed Building or within a site designated as a Scheduled Monument.
- On land within a Conservation Area or World Heritage Site the ASHP must not be installed on a wall or roof which fronts a highway or be nearer to any highway which bounds the property than any part of the building.
- On land that is not within a Conservation Area or World Heritage Site, the ASHP must not be installed on any part of a wall above the level of the ground floor storey if that wall fronts a highway.

The installation of ASHPs is also subject to the following conditions:

- The ASHP should only be used for heating purposes.
- The ASHP should removed as soon as reasonably practicable when it is no longer required.
- The ASHP should be located, as far as practicable, to minimise its effect on the external appearance of your home and surrounding area.

Different requirements apply to Listed Buildings, set out in the next section.

The need to minimise the visual impact of the ASHP is of particular importance to homes within Conservation Areas. The external appearance of these homes contributes to the historic importance and character of the area. ASHPs can be intrusive as modern features.

ASHPs will not be acceptable if placed within the front garden or street facing roof of a home in a Conservation Area. ASHPs should also not be placed in any other publicly visible area of your home in a Conservation Area.

You will need planning permission if the above limits and conditions cannot be met. You may wish to apply for a Certificate of Lawfulness before installing an ASHP. This will provide a formal confirmation that planning permission is not required.

Listed Buildings

You will need planning permission and Listed Building Consent for the installation of ASHPs if your home is listed.

The benefit of an ASHP will be limited in Listed Buildings that are not insulated or airtight. The necessary pipework and units could also compromise the integrity of the Listed Building.

We do not generally encourage the installation of ASHPs within Listed Buildings. ASHPs may be acceptable if part of a whole-building approach and demonstrating that no harm will be caused to the Listed Building.

2.6 Solar panels

Is permission required for solar panels?

Houses	Flats/Maisonettes	Conservation Area	Listed Buildings
Planning permission is not generally required unless the proposal falls within the list of exceptions of permitted development.	Planning permission is not generally required unless the proposal falls within the list of exceptions of permitted development.	Planning permission is not generally required unless the proposal falls within the list of exceptions of permitted development.	Planning permission and Listed Building Consent are required.

Table 8: 'Is permission required for solar panels?'

i We offer a free pre-application advice service for installing solar panels at your home. You can use this service to discuss the works with a planning officer. This could help resolve any planning policy or design issues before you make your application.

Solar photovoltaic panels (PVs) convert energy from sunlight into electricity to power your home. Solar thermal systems are also available which use the similar technology to provide heating and hot water. Solar panels are most commonly fitted onto roofs and a typical system for a house will produce 5000 kWh per year.

Installing solar panels or solar thermal systems can reduce the cost of your energy bills and reduce the carbon footprint of your house's energy use.

You will need to talk to your energy provider about the most suitable solution for your home and how the generated electricity can be used.

Houses, flats and maisonettes and homes within Conservation Areas

The installation of solar panels is permitted development within houses, flats and maisonettes or homes within Conservation Areas. However, there are several exceptions and conditions which need to be met, which can be found on the Planning Portal. Different requirements apply to Listed Buildings, detailed in the subsequent section.

If planning permission is required, the following should be included within your application:

- A description of the solar PV and/or solar thermal system you intend to install
- The capacity (electrical output) of the proposed system (KWph)
- The number of solar panels and the area covered by the panels (m^2)
- Details on any potential overshadowing from trees, other buildings and roof features.

A Visual Impact Assessment (VIA) should be included if your home is within a Conservation Area and the solar panels will be visible from a public viewpoint. It should be proportionate to the scale of the proposed works and address:

- How many panels are proposed and how they will be arranged
- How visible the panels will be from public areas
- How the proposed panels have considered the design guidelines set out in Figure 17

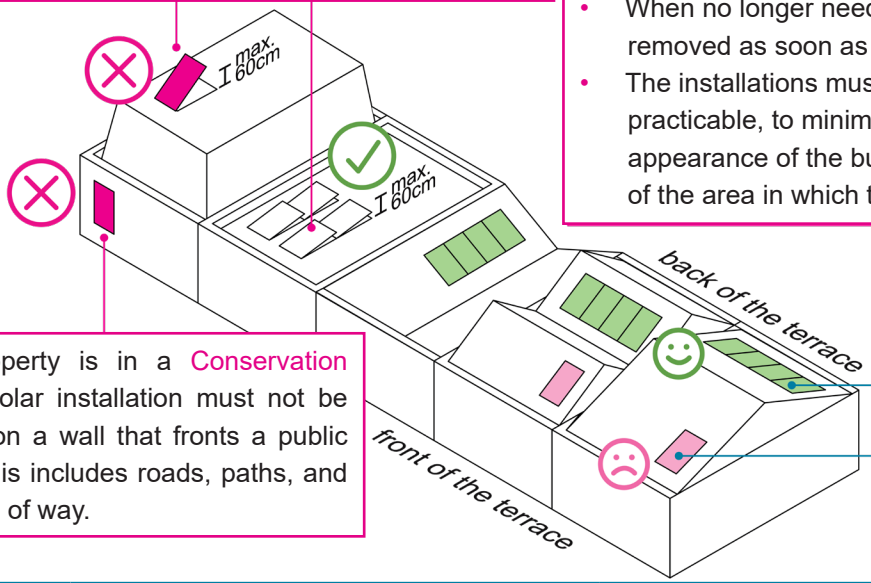
Solar panels can clutter if installed poorly. They may also appear disorderly and harm the character of your home. This is of particular concern if your home is within a Conservation Area. The external and public facing appearance of homes within Conservation Areas often contribute positively to the historic character and significance of the area and should be preserved.

Guidance on where to fit solar panels and ways to minimise their visual impact is provided in Figure 17 on the next page. However, this needs to be balanced with the direction your home is facing to ensure the panels perform efficiently.

Permitted development conditions - Planning permission is required if you fail to meet any of the conditions.

- The solar installation must not protrude more than 0.6 metres beyond the plane of the wall or the roof slope when measured perpendicularly from the external surface of the wall or roof slope.
- The highest part of the installation must not exceed the highest part of the roof (excluding the chimney).

- The solar PV or solar thermal system must not be installed on a site designated as a scheduled monument.
- The solar PV or solar thermal system must not be installed on a Listed Building, a building within the gardens or grounds of a Listed Building.
- When no longer needed, the installations should be removed as soon as reasonably practicable.
- The installations must be sited, so far as is practicable, to minimise the effect on the external appearance of the building and the visual amenity of the area in which the building is located.



If your property is in a Conservation Area, the solar installation must not be positioned on a wall that fronts a public highway. This includes roads, paths, and public rights of way.

Design principles

To minimise visual impact

Position

Install on less visible roofs where possible. Avoid installation on public-facing roofs.

	Do's	Don'ts
Colour & contrast	Colour of the panels should match that of the roof. Frameless panels or panels with painted frames are encouraged. Use low-reflecivity panels to reduce glare.	Avoid untreated cables and frames that contrast with the colour of the roof.
Arrangement	Panels should be well aligned, arranged in the same direction and symmetry. Organise them carefully around roof features if any.	Avoid arranging panels in a mix of horizontal and vertical directions with zero symmetry.
Spacing	Panels should be evenly spaced and set in at least 1m from every edge of the roof and/or wall margins.	Avoid placing panels too close to the roof edges.
Mounting system	In-roof mounting system is encouraged. Panels are integrated as part of the roof instead of sitting on top of the tiles.	Avoid too much gap between the panels and roof surface. It may lead to bird nesting or leaves getting stuck under the panels. Mounting rails should not go beyond the panels.
Neighbouring solar panels	Try to resemble the style of neighbouring solar panels if possible.	Try not to diverge too much from the style of neighbouring solar panels.

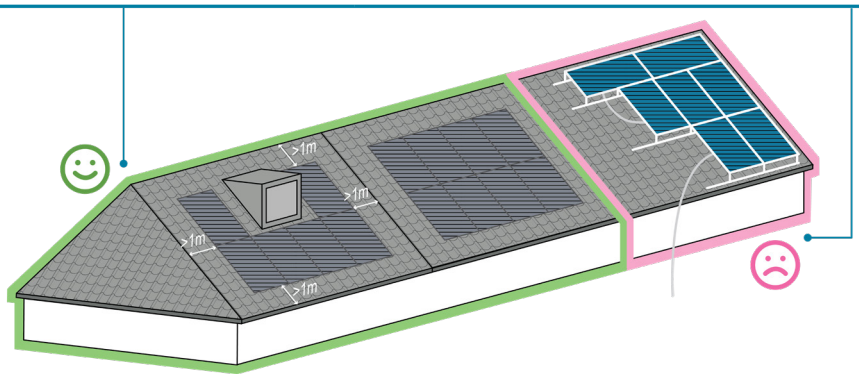


Figure 17: Siting solar panels and design principles to minimise visual impact

Listed Buildings

Planning permission and Listed Building Consent will be required for the installation of solar panels if your home is listed.

As a modern feature, solar panels are not considered to be sympathetic with many of the Listed Buildings found within the borough. This means solar panels will need to be installed sensitively and in the least disruptive form possible. Solar panels will not be permitted if adverse harm is caused to the visual appearance or historic fabric of the Listed Building.

The external appearance of a Listed Building is often of great importance to its character and significance and should be preserved. Overly visible solar panels would cause harm to a Listed Building's external appearance by introducing an inherently modern feature. Solar panels should be shallow pitched and hidden behind parapets where possible. They may also be placed on sections of the roof which are not visible to the front or rear of your property.

Solar panels may result in the loss of historic fabric as roof tiles may need to be removed for the installation. Although a few tiles may seem minor, these roofs tend to be original and historic feature. They contribute to the character and significance of the Listed Building. Great effort should be made to preserve as much historic fabric as possible. Where new tiles are required, these should be like-for-like replacements.

Ground-mounted solar panels may be a more appropriate solution for a Listed Building. Such will reduce any visual impact and avoid interaction with historic fabric.

You will also need to consider whether your home is listed as part of a group of buildings and the impact solar panels would have on the significance of the wider listed group. Group listing commonly applies to terraced properties, where the whole terrace is included in the listing as opposed to one individual home. If you home is group listed, then you will need to ensure any works maintain consistency across the group and do not introduce features which will detract from the Listed Buildings. You can find out whether your home is group listed in the Listed Building description. It will refer to your property's address or a wider group.

We welcome positive improvements to front garden which promote active design, reduce clutter and improve access to your home, especially for vulnerable residents. This can include providing space for cycle storage or enclosures for recycling and refuse bins.

2.7 Cycle and bin storage

Any cycle or bin enclosure is encouraged to be placed against a side boundary within the front garden, and not impede access to the front door. Storage should be kept away from the front boundary wall with the street where possible. Cycle or bin storage should not open onto the street pavement and should be accessed from within your front garden. This avoids any incursion or interruption into the public highway.

Cycle storage

Cycle storage is encouraged to be fully enclosed, secure and weatherproof and be easily accessible. Cycle storage is also encouraged to be to Sheffield stand specification, which provides the most convenient and accessible form of cycle parking.

Refuse storage

Refuse storage is encouraged be provided in accordance with the council's "Waste management guidance notes for residential developments" document.

2.8 Off street parking

Is permission required for off-street parking?

Houses	Flats/Maisonettes	Conservation Area	Listed Buildings
Planning permission is not generally required unless the proposal falls within the list of exceptions of permitted development.	Planning permission is required.	Planning permission is required.	Planning permission and Listed Building Consent are required.

Table 9: 'Is permission required for off-street parking?'

An application for residential off-street parking usually consists of three elements:

- Hardstanding area of your home (generally a front garden), large enough to hold a standard vehicle whilst not obstructing your front door (at least 2.4m x 6.0m)
- A vehicle crossover to enable legal and safe access to your property from the carriageway
- The specified number of parking spaces

2.8.1 Hardstanding

Hardstanding refers to an area which has been paved over with a hard, non-porous material (such as concrete) for car parking. For residential off-street parking, this generally involves paving all or part of the front garden at your home.

Areas of hardstanding are not encouraged in most homes due to the negative impact on front gardens. Greenery and planting are often replaced with hardstanding materials which are less permeable. This increases rainwater run-off as it cannot be absorbed. The removal of greenery and planting also negatively impacts the character of your home (especially in Conservation Areas or listed homes). It can further detract from the appearance of the existing streetscape and impact the visual amenity of the area.

Permitted development allows for 5m² of hardstanding in a front garden. This is often not enough to fit a standard modern vehicle which generally requires 14.4m² of paving on average. You would therefore need planning permission if using hardstanding for the purpose of parking a vehicle. Permitted development does allow for paving of any size if made of a porous material (such as impermeable paving) or if provision is made to direct run-off water to a permeable or porous area.

You will need to apply for planning permission for any hardstanding or non-permeable paving if your home is a flat, maisonette, in a Conservation Area or a Listed Building as permitted development does not apply.

Planning permission may also be required for the necessary vehicle crossover to facilitate the off-street parking on the hardstanding.

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Separate permission also needs to be sought from the council's Highways team for all vehicle crossovers (unless the road forms part of the Transport for London Road Network (TLRN), where permission would need to be sought from Transport for London instead).

2.8.2 Vehicle crossovers

Vehicle crossovers generally involve lowering a kerb and allowing for a car to drive across a public road and pavement to access off-street parking.

Vehicle crossovers can cause conflict with pedestrians, bicycles and vehicles by interrupting movement along a street. Vehicle crossovers also remove usable kerbside space, including on-street parking spaces available to all.

Planning permission is required for vehicle crossovers when:

- On classified roads and trunk roads
- Providing access to a property that is a maisonette or divided into flats
- In a Conservation Area
- Providing access to a listed home (permission required alongside Listed Building Consent)

Receiving planning permission does not always mean you can install a vehicle crossover. Permission for all vehicle crossovers need to be sought from the council's Highways team in addition. There will be a presumption against vehicle crossovers where the vehicle is required to reverse in or out, due to safety concerns and limited visibility of the pedestrian highway. Refer to Southwark Streetscape Design Manual (SSDM) DS.132 'Vehicle Crossovers' for further guidance.

There are certain highway features which cannot be moved for a vehicle crossover, such as speed humps or traffic islands. Your application for a vehicle crossover will be refused if any non-moveable features are located outside of your home. Full details of all non-moveable features can be found in fact box 2.

Other features may be moveable, such as on-street electric vehicle charging points or cycle stands. The costs of the relocation would be paid by the applicant seeking the crossover. These costs can be significant and will vary depending on the feature. Your application for a vehicle crossover may still be refused if the relocation of the feature would have an adverse impact on the public highway. Full details of all potentially moveable features can be found in fact box 3.

Further requirements which a vehicle crossover needs to meet are listed in fact box 4.

If a crossover is to be installed, you are encouraged to follow the best practice example set out in Figure 18. This is best practice guidance for all vehicle crossovers, regardless of whether planning permission is required or not.

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Fact box 2: Non-moveable features

The following list contains items that cannot be relocated or removed to install a vehicle crossover. If any of the below items are located outside of your home, your application for a vehicle crossover will be refused.

Traffic calming features, such as speed humps, raised tables, speed cushions and traffic islands. These are strategically placed for highway safety reasons and would be less effective, or ineffective, if relocated.

Street trees provide canopy cover that cleans our air, soil and water. Street trees also mitigate the urban heat island effect and reduce flood risks. Mature trees cannot be replaced as the amount of canopy cover provided by a new tree would not be a like-for-like replacement.

Street lighting columns cannot be located within 1.2m of the edge of a vehicle crossing due to the risk of impact from vehicles and the resulting safety issues. Relocating a street lighting column is not possible. The council need to ensure even light cover for safety at night. The council also need to prevent light pollution and reduce impacts of lighting on wildlife.

Signage is placed in a specific location to help with wayfinding and to ensure compliance with highways regulations, such as speed limits or Controlled Parking Zones.

Uncontrolled formal crossings for pedestrians, such as zebra crossings. These are situated at points of potential conflict to guide pedestrians to the safest crossing location. These crossings cannot be relocated as this would increase risks to pedestrians.

Controlled formal crossings, such as toucan or puffin crossings. These are located to ensure the transport network can function safely and efficiently. Relocation of a controlled formal crossing for a residential crossover would have a negative impact on the transport network.

Bus stop cages cannot be closer than 10m on the same side of the street from a new vehicle crossover. As the Highway Authority, the council has the right to extend this distance if the frequency of bus services or the number of queuing passengers warrants it. Relocating a bus stop cage could have a negative impact on the local transport network.

Blue Badge bays are located to be accessible to residents from specific properties. Relocating a Blue Badge Bay would not be acceptable due to the difficulties it may cause to Blue Badge Holders.

Fact box 3: Potentially moveable features

The following list contains items that could potentially be relocated to facilitate a vehicle crossover. The costs of the relocation would be paid by the applicant seeking the crossover. These costs can be significant and may include but is not limited to the Traffic Management Order (TMO). Your application for a vehicle crossover may still be refused if the relocation of the feature would have an adverse impact on the public highway.

On-street electric vehicle charging points (EVCPs)

- May be moved within the immediate vicinity of their existing location.
- This is only in instances where the move would not have a negative impact on residents.
- Relocation would be subjection to consultation during which other residents may raise objections.
- The applicant would bear all costs associated with relocating the EVCP. This would include the TMO and movement of the parking bay associate with the charger.

Standard parking bays

- Can be moved or removed where parking stress in the vicinity of the site is demonstrated to be lower than 85%.
- Relocation would be subjection to consultation during which other residents may raise objections.
- The applicant would bear all costs associated with moving or removing the parking bay. This would include the TMO and the signing / lining of the relocated bay.
- The applicant may also be liable for financial compensation that covers the loss of council parking revenue.
- The council may refuse an application where the parking bay would provide valuable kerbside space for uses that benefit the wider public.

On-carriageway cycle hangers

- Can be moved only where there is an appropriate location for the replacement(s) in the vicinity of the site. Users of the hanger must also not be inconvenienced by the relocation.
- Relocation would be subjection to consultation during which other residents may raise objections.
- The applicant would bear all costs associated with moving the cycle hangar. This would include the TMO.
- An agreement with the users of the existing hanger must be in place to ensure there is no loss of access or displaced cycles.

Cycle stands on footways

- Can be moved only where there is an appropriate location for the replacement(s) in the vicinity of the site.
- If there is no suitable location for the replacement, the council will likely refuse your application to ensure adequate cover of visitor cycle parking throughout the borough.
- The applicant would bear all costs associated with relocating the cycle stand.

Segregated cycle lanes or tracks

- Can be adjusted where the council deem appropriate, considering the adopted Streets for People strategy which prioritises active travel over private vehicles.
- The applicant would bear all costs associated with relocating the cycle stand. This would include a level 1 departure, a road safety audit (RSA) and TMO. This would likely be a significant expense.

Fact box 4: Highway requirements for vehicle crossovers

Proximity to side roads – New vehicle crossovers cannot not be located within 15m of a side road junction to the same side of the street. On classified roads (A, B and C roads) the minimum distance is 24m.

Consecutive crossovers – Less than 1.2m length of standard footway between crossovers, including between the proposed crossover and existing crossover(s), would be considered unacceptable. This is because frequent changes in crossfall and gradient cause difficulties for those with visual or mobility impairments.

Cross and Long-falls - Measured across the footway, the crossfall gradient should be between 1:30 - 1:60 (1:40 preferred). Gradients should not exceed 1/12 to ensure the safety of pedestrians and a gradient steeper than ¼ will not be permitted.

Visibility splays – Pedestrian sightlines of 1.5m x 1.5m are required either side of the opening in the boundary for a vehicle access from the back edge of the public highway (not within the opening). No features higher than 0.6m are permitted within this area. Vehicle sightlines of 2.4m x 25m (20mph roads) or 2.4, x 43m (30mph roads) are also required.

Entry and exit – On Classified roads, vehicles must be able to enter and exit in forward gear. To reduce conflict between road users, only 1 crossover per residential property will be permitted.

Space for 2.4 x 6.0m vehicle – There must be at least 2.4 x 6.0m of hardstanding or permeable material per car parking space. Gates must open inwards or slide to the side within the bounds of your property. Where gates are proposed to open inwards, additional length of hardstanding is required ensure gates can open while the vehicle is parked. Refer to Southwark Streetscape Design Manual (SSDM) DS.132 'Vehicle Crossovers' for further guidance.

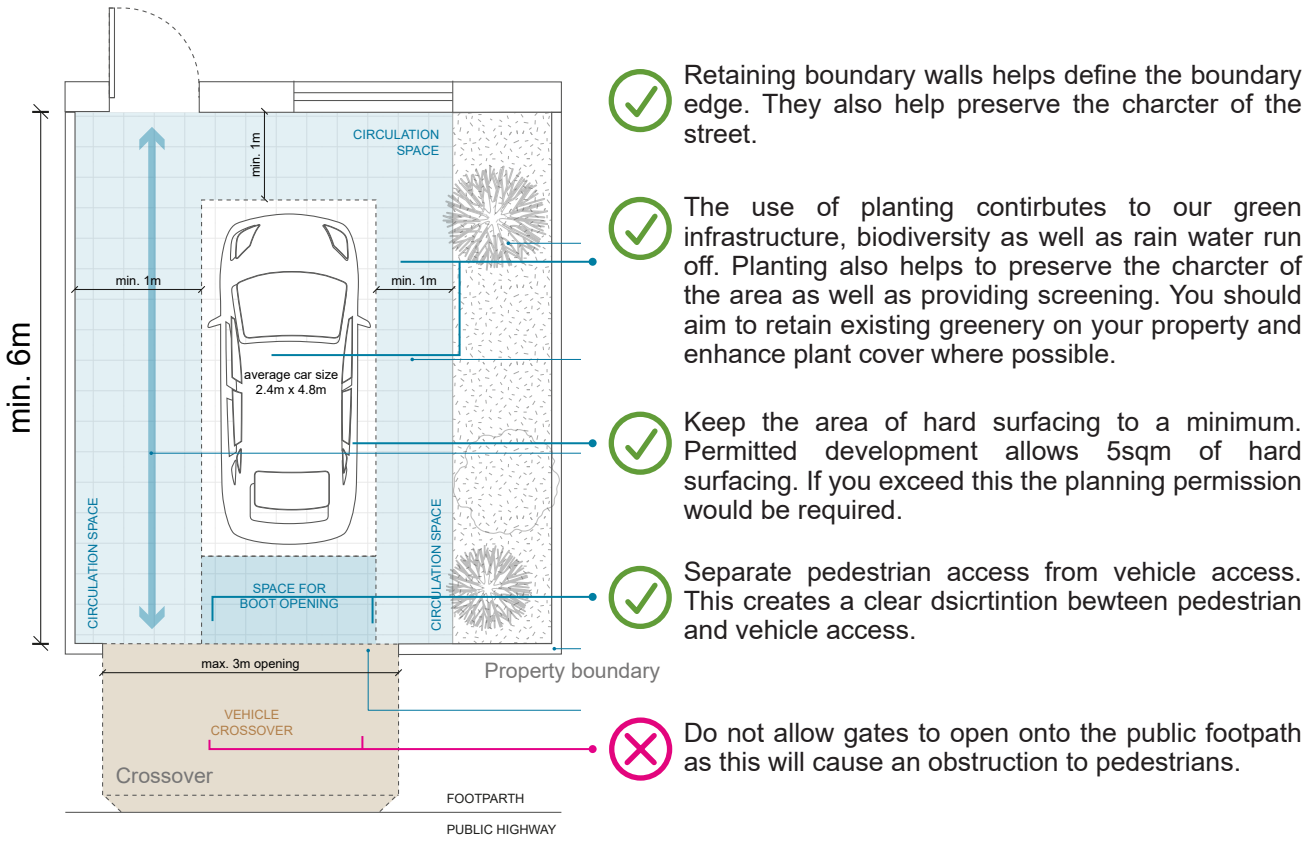


Figure 18: Best practice design guidance on vehicle crossovers

Electric vehicle charging points

You should check whether you can have off-street parking before installing any electric vehicle charging points. For more information on electric vehicle charging points please refer to the council's website.

2.9 External painting

Is permission required for external painting?

Houses	Flats/Maisonettes	Conservation Area	Listed Buildings
Planning permission is not required.	Planning permission is not required.	Planning permission is not required unless the external appearance will change significantly.	Listed Building Consent is not required unless your home is not currently painted, or the external appearance will change significantly.

Table 10: 'Is permission required for external painting?'

Regular external redecoration can help prevent decay at your home. You may also wish to repaint your home a different colour. In most cases, planning permission is not required unless the permitted development right is removed by an Article 4 Direction.

Conservation Areas

We encourage the use of traditional colours when you are painting your home in a Conservation Area. There may be conventions of using brighter colours in certain areas of the borough or the use of the same colour in a terrace. You are advised to consider local approaches before planning any works, detailed in our Conservation Area appraisals.

Listed Buildings

Listed Building Consent is not required if you are carrying out like-for-like repainting. This means your home is already painted, and you are reapplying the same colour for regular maintenance.

Listed Building Consent will be required if you wish to paint non-painted external areas – for example brick, stone or concrete. Consent will also be required if the external appearance is changing colour – for example from cream to dark grey.

Decisions will be made on a case-by-case basis, but we generally do not support change to the exterior of a Listed Building. Painting brick, stone or concrete walls should be avoided as it could create damp issues and is considered harmful to the historic fabric. On buildings with external coatings, e.g. stucco and lime render, 'breathable' paint such as limewash should be used to ensure moisture in walls can evaporate.

2.10 Other development

2.10.1 Boundary walls and fences

Planning permission would not be required if you want to erect a wall or fence, alter or take down an existing wall or fence if you ensure that you meet the following conditions:

- At the front of the property does not exceed 1m in height from ground level
- To the rear of the property does not exceed 2m in height from ground level

Beyond this, planning permission would be required. Listed Building Consent may be required if your home is listed depending on the type of boundary wall or fence proposed to be replaced.

2.10.2 Decking and hardstanding

Decking and hardstanding should be no more than 300mm/30cm above the ground and cannot cover more than 50% of the rear garden at your home.

CHAPTER 3

EXTENSIONS

3 EXTENSIONS

3.1 Introduction

This chapter sets out the works a resident can consider when looking to extend their home. Guidance is provided on the most common types of extensions for residential properties as well as other works such as roof terraces and outbuildings.

This chapter also provides guidance on any relevant planning considerations. These could include design quality, impact on neighbouring properties, and impact on heritage assets (such as Listed Buildings and Conservation Areas).

Some extensions are permitted development subject to conditions and limitations. This guidance should be read alongside the Permitted Development (Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended). It is your responsibility to ensure you comply with all the legal requirements. The SPD sets out the position accurately in May 2024.

You will need professional advice before you plan an extension to your home. An architect, architectural designer, or surveyor will be able to prepare plans and advise you on the costs involved.

3.2 Key considerations

There may be many factors which need to be considered before planning how to extend your home. This will depend on the type of property you live in and where it is located.

3.2.1 Whole Building Approach

We encourage a 'Whole Building Approach' when looking to extend your home. Planning an extension is a useful opportunity to consider where improvements could be made to your existing home. This could help improve your home's overall energy and thermal performance.

You should consider how your extension plans work with any future ideas for other improvement works. This could be insulating your home, installing heat pumps or solar panels. It would be useful to have an idea of these works so you can future proof your extension plans. Guidance on these works is set out in Chapter 2.

We also encourage energy efficient design and construction. Ways to reduce the carbon

emissions of your extension are best considered at the start of the design process. This could include the use of sustainable materials, green roofs or potential for natural cooling or heating in the extension. You should think about the lifespan of the materials you are using and whether they can be repaired, replaced or recycled in future.

Figure 19 below demonstrates a Whole Building Approach to extending your home. The approach shows which parts of your home to consider first and how to think about the design and construction of your extension. This can also help make your home more resilient to the effects of a changing climate.

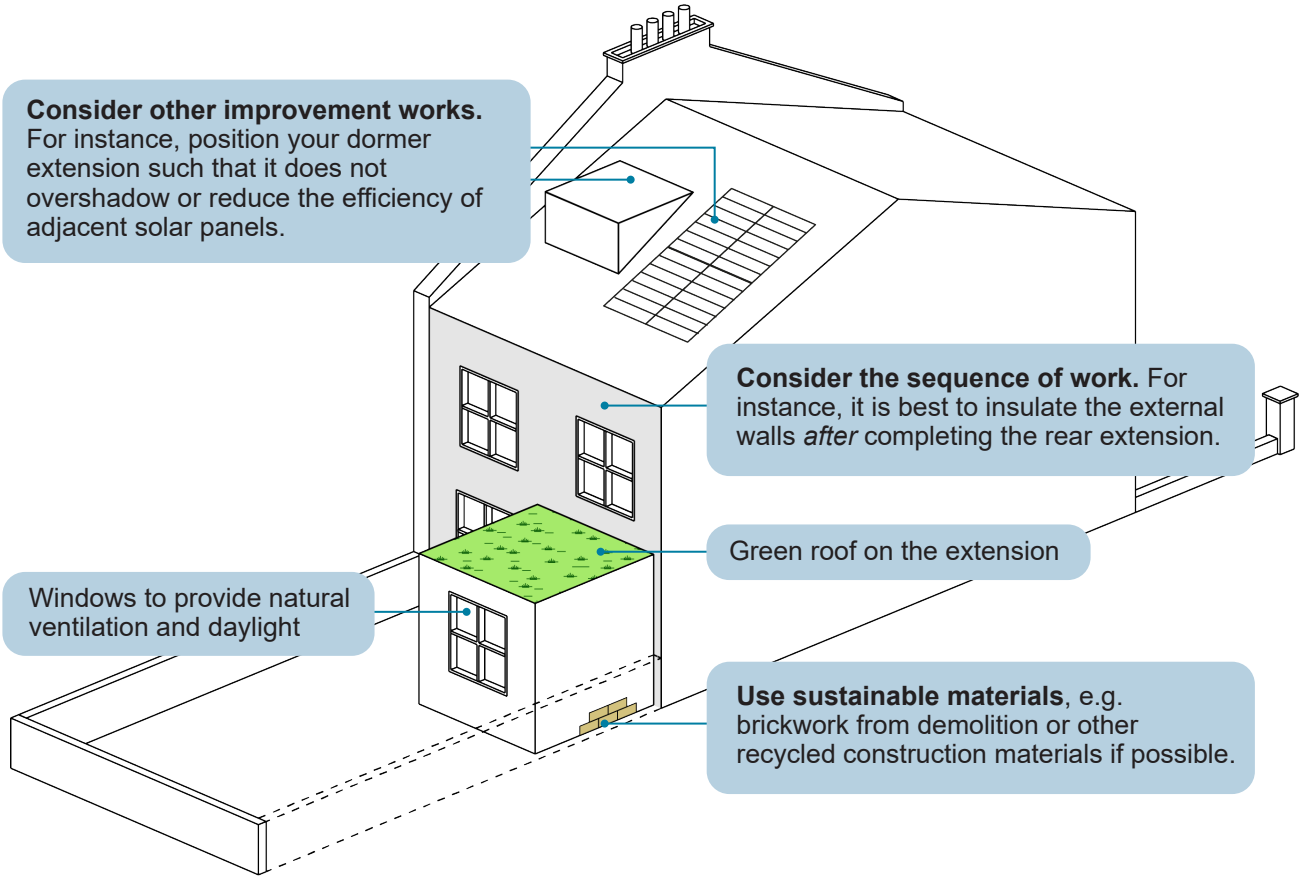


Figure 19: Whole building approach for extensions

3.2.2 Design and appearance

There are many different types of homes in Southwark which show the rich and varied architecture in the borough. Each type of home has its own distinctive features which define its character and style. Whether it a house, a flat, a historic or modern building, features such as windows, doors, the roof or other materials will contribute to a home's appearance.

An efficient and cost-effective extension can work in harmony with your existing home and provide more space where you need it. An extension can also be designed to bring more light and air into your home, providing a better connection to the outdoors.

You should not only consider the type of extension you want but how the extension will relate to your property, as well as the surrounding area.

An extension should:

- Be in keeping with the architectural style of your home
- Be of a size and scale that would not visually dominate your home
- Use materials that are similar to your home
- Be in keeping with the character of the surrounding area, including any historic pattern
- Avoid impact to the amenity of neighbouring properties
- Prioritise energy efficient design and climate resilient construction where practical
- Innovative and modern design will be encouraged where the works are of a high architectural and design quality.

3.2.3 Internal space standards

There are no minimum area standards for internal spaces within a residential extension. These only apply to the creation of new dwellings.

Nonetheless, we encourage you to follow the room areas outlined in table 11. This will ensure your home remains enjoyable and liveable, with a high quality of accommodation.

Dwelling size	Studio	1 bed	2 bed	3 bed	4 bed
Double bedroom	N/A	12	12	12	12
Single room	N/A		7	7	7
Living room (where eating area is in the lounge)	N/A	16	17	18	19
Kitchen (where eating area is in the lounge)	N/A	6	7	8	8
Kitchen diner (where eating area is in the kitchen)	N/A	9	11	11	12
Living room (where eating area is in the kitchen diner)	N/A	13	13	15	15
Open plan development (where kitchen/diner is combined with the living room)	N/A	24	27	30	N/A
Bathroom/WC (combined)	3.5	3.5	3.5	3.5	3.5

Table 11: Minimum room areas recommended in square metres

3.2.4 Heritage assets

Additional consideration will need to be given if your home is listed or within a Conservation Area. An extension should be of a high-quality design and be sympathetic to your home.

Your extension can be of a modern design, but the use of traditional materials is still encouraged. This includes materials such as brick, slate or timber. These materials will help reference the historic character of your home or the surrounding area. Traditional materials also tend to last longer than modern substitutes, giving better value and being more sustainable over time.

UPVC (Unplasticized Polyvinyl Chloride) will not be permitted in any of our Listed Buildings or Conservation Areas, even to the rear of a property. UPVC generally appears out of place in historic buildings or areas, owing to the plastic appearance. UPVC may also weather or behave differently from natural and more traditional materials.

Conservation Areas

You should read the Conservation Area appraisal for your area before planning any works. This set outs the type of materials you should use and the common types of developments if your area.

Listed Buildings

The external appearance of a Listed Building is often of great importance its significance. Any extension should be sympathetic and subservient to your home, and not detract from its external appearance or its historic features.

You will need to consider any historic features of your home, such as whether you have an outrigger or butterfly roof. This may dictate the type of extensions which are possible. We will resist the loss of butterfly roofs and other prominent historic features.

The internal walls and plan form are also very important and reflect the domestic history of a home. These are often not referenced in Listed Building descriptions but are protected by the listed status of the property. You will need to consider the amount of building fabric which needs to be removed to build an extension. This includes any windows, doors, internal walls or chimney breasts. The removal of these features will be considered under the Listed Building Consent.

We will not permit the removal of internal walls where it results in the loss of the original plan form of your home. This means we will not generally allow the whole removal of internal walls to create an open plan living room / kitchen / dining room. We may allow partial removal of walls where there is a retention of wall nibs and down stands. This allows the original plan form to still be legible whilst opening the room up. The loss of other original features such as chimney breasts will also be resisted.

You will also need to check whether your home is listed as part of a group of buildings. If so, you will need to consider the impact any works would have on the significance of the wider listed group. You can find out whether your home is group listed in the Listed Building description. The description will refer to your property's address on its own or part of a wider group. Even if your home is not group listed, it is worth having consideration to any other Listed Buildings in the vicinity of your property.

3.2.5 Trees

You must consider how the planned extension may impact any nearby trees. This not only includes trees on your property but also those nearby in neighbouring properties. Extensions which involve works to the ground may cause harm to the root protection area of a tree or a tree may have to be removed to clear space for the work. The root protection area of a tree (RPA) is calculated at 12 x the diameter of the tree, measured at 1.5m from the ground. For example, a 300mm diameter tree will have an RPA radius of 3.6m from the bole of the tree, expressed as a circle. This is demonstrated in Figure 20.

If you are pruning, removing or carrying out works that may affect trees (including excavation) you will need to submit a Tree survey or Arboricultural Impacts Assessment as part of your planning application. More information on the assessment can be found here.

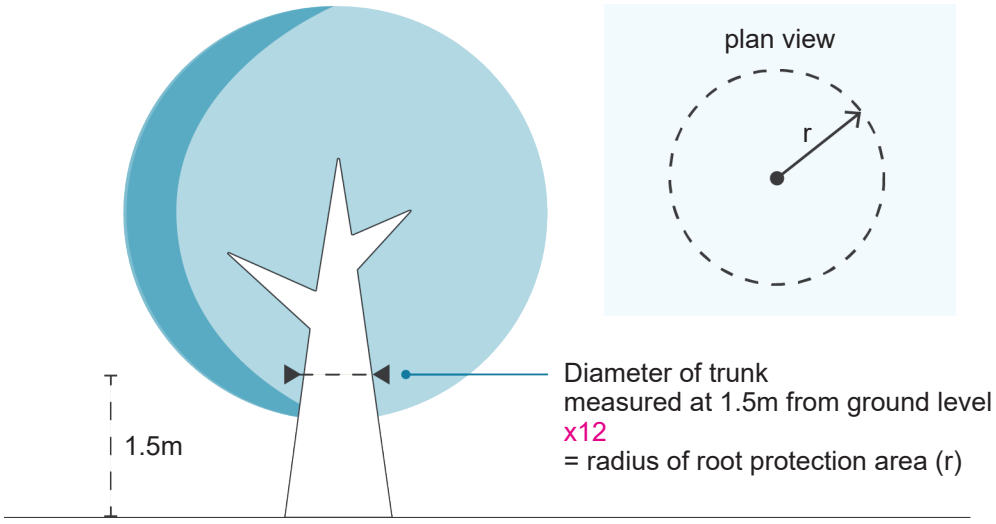


Figure 20: Root protection area of a tree

3.2.6 Impact to neighbouring properties

You must ensure any proposed extension does not negatively impact on your neighbour's ability to enjoy their home.

There are three main factors which are used to assess whether a neighbour is adversely affected:

- Daylight and Sunlight: Proposed works should not cause unacceptable harm the amount of daylight or sunlight your neighbour has access to.
- Privacy: Proposed works should protect the privacy for your neighbour
- Loss of Outlook: Proposed works should not unacceptably harm outlook for neighbours.

Daylight and sunlight tests

We carry out two daylight and sunlight tests when assessing a planning application for an extension. This is to ensure the extension does not cause unacceptable harm to the daylight or sunlight your neighbour has access to.

These tests are the 45-degree rule and 25-degree rule. It is recommended that you carry out these tests before submitting your plans to ensure the extension is compliant.

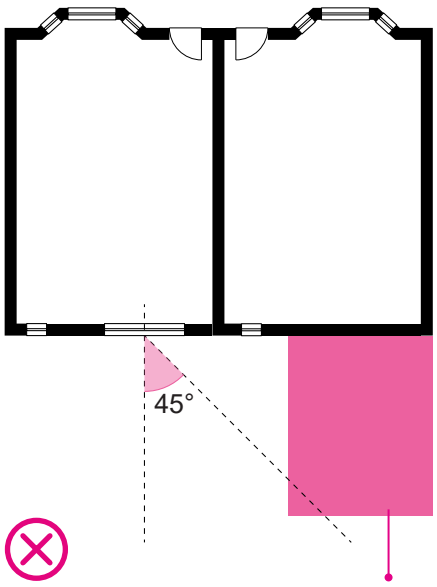
45-degree rule

We use this test should where the proposed development is at right angles to the affected window of the neighbouring property:

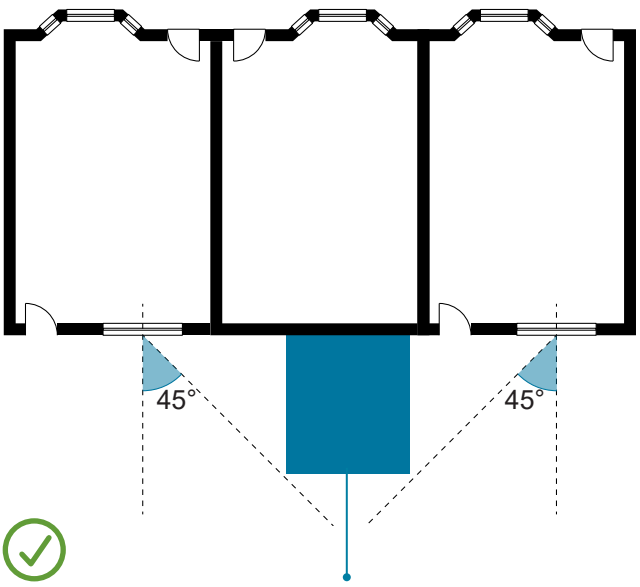
- Draw a line at 45 degrees upwards from the centre of the affected window
- Draw a line at 45 degrees sideways from the centre of the affected window

This test is demonstrated in Figure 21 below.

If the proposed development is both higher and wider than these 45-degree lines, there may be an unacceptable loss of daylight to the affected window.



The proposed rear extension crosses the 45° line marked from the centre of the window of the neighbouring property. The proposed rear extension could cause an unacceptable loss of daylight.



The proposed rear extension does not touch the 45° line and therefore would not negatively impact the daylight of the neighbouring properties.

Figure 21: 45-degree rule

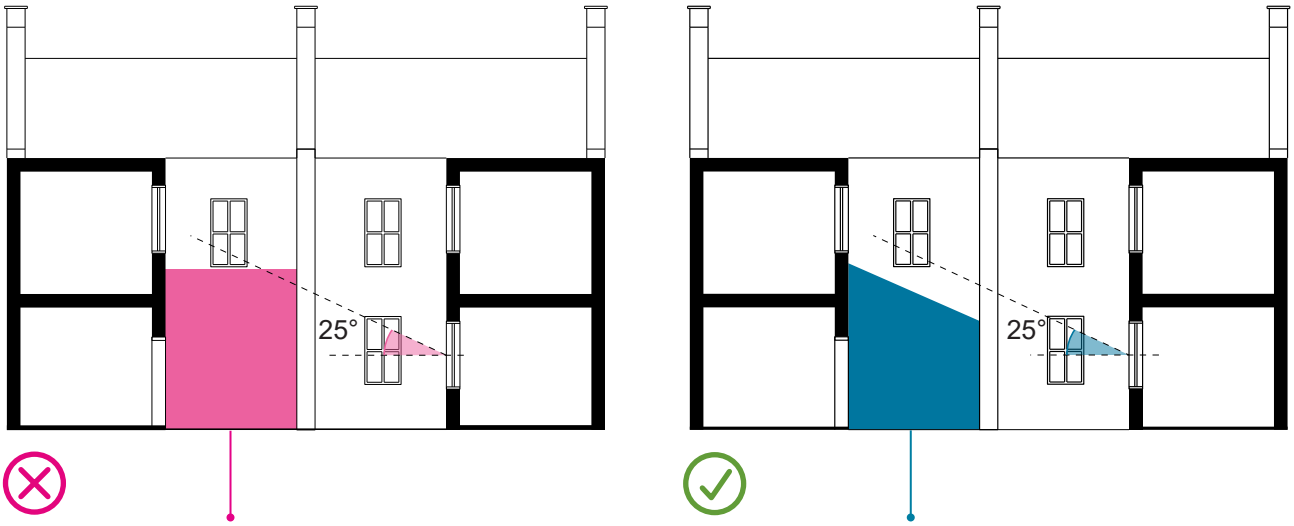
25-degree rule

We use this test where the proposed extension faces the affected window of the neighbouring property:

- Draw a line at 25 degrees upwards from the centre of the affected window

If the proposed extension is higher than this 25-degree line, there may be an unacceptable loss of daylight to the affected window.

This test is demonstrated in Figure 22 below.



The proposed extension crosses the 25° line marked from the centre of the window of the neighbouring property. The proposed extension could cause an unacceptable loss of daylight.

The proposed rear extension does not touch the 25° line and therefore would not negatively impact the daylight of the neighbouring properties.

Figure 22: 25-degree rule

3.2.7 Party walls

A party wall is a wall shared by two adjoining properties. Depending on the type of home you live in, you may share may have party walls with more than one neighbour. The Party Wall Act 1996 is in place to control development on each side of a party wall and maintain its integrity and function.

Certain works may need a Party Wall Agreement with your neighbour(s). This is separate from any planning permission you may receive.

3.3 Front extensions

Is permission required for a front extension?

Houses	Flats/Maisonettes	Conservation Area	Listed Buildings
Permitted development applies within certain dimensions. Above this, Planning Permission will be required.	Planning Permission will be required.	Planning Permission will be required.	Listed Building Consent and Planning Permission will be required.

Table 12: 'Is permission required for a front extension?'

Front extensions are generally limited to porches for most properties within the borough. Permitted development allows for the construction of a front porch to a maximum of 3sqm in area and 3m in height. This is shown in Figure 23 below.

Beyond these dimensions, you will need planning permission. Planning permission is also required for front extensions if your home is a flat / maisonette or within a Conservation Area. It is also needed alongside Listed Building Consent for listed homes.

We do not encourage front extensions which exceed these permitted development dimensions as the extension would likely be too visible in the existing street scene. Overly large front extensions can impact the character and appearance of your home.

It is also important to maintain the established building line in your street. This ensures a consistency to the area. Front extensions will not be permitted where this building line is significantly disrupted. This would result in a discordant feature within the streetscape.

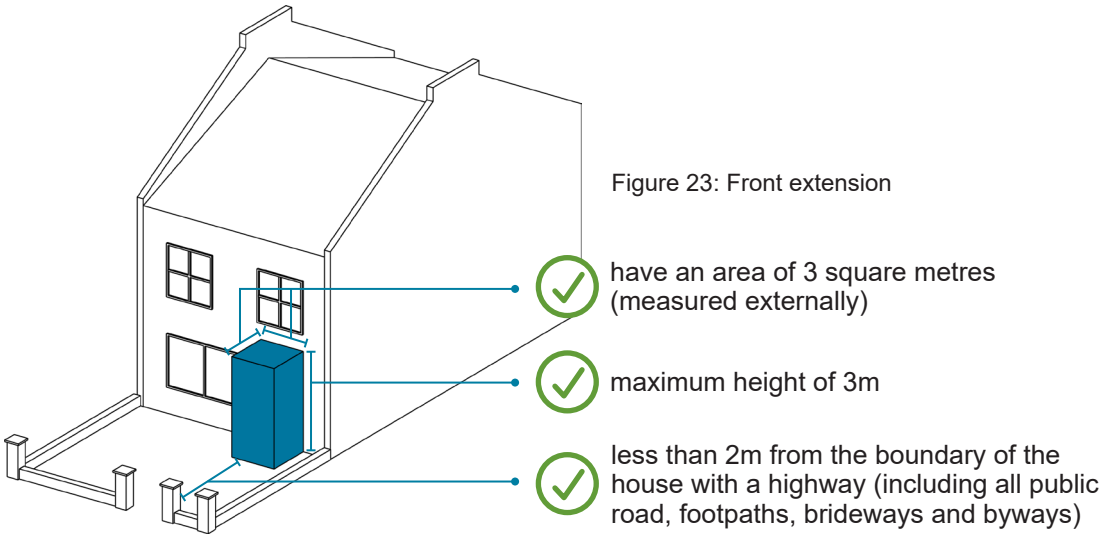


Figure 23: Front extension

3.4 Side extensions

Is permission required for a side extension?

Houses	Flats/Maisonettes	Conservation Area	Listed Buildings
Permitted development applies within certain dimensions. Above this, Planning Permission will be required.	Planning Permission will be required.	Planning Permission will be required.	Listed Building Consent and Planning Permission will be required.

Table 13: 'Is permission required for a side extension?'

Side extensions are commonly found at detached and semi-detached properties as well as the end of terraces. Consideration needs to be given when planning a side extension to maintain the sense of openness between buildings. This is important for maintaining the character of the existing street scene. It also reduces the sense of enclosure in the area.

Side extensions should be subservient to the existing building and not be a dominating feature. This is especially important if your home is listed or within a Conservation Area.

3.4.1 Single storey side extension(s)

Permitted development allows a single storey side extensions with a maximum height of 4m. The width should be no more than half the width of your home.

Beyond these dimensions, you will need planning permission. Planning permission is also required for front extensions if your home is a flat / maisonette or within a Conservation Area. It is also needed alongside Listed Building Consent for listed homes.

Where planning permission is required, side extensions should still be kept to a single storey. The extension should also be set back from the street-facing façade of the property by 1.5m. This will ensure the important gaps and sense of openness between properties are maintained.

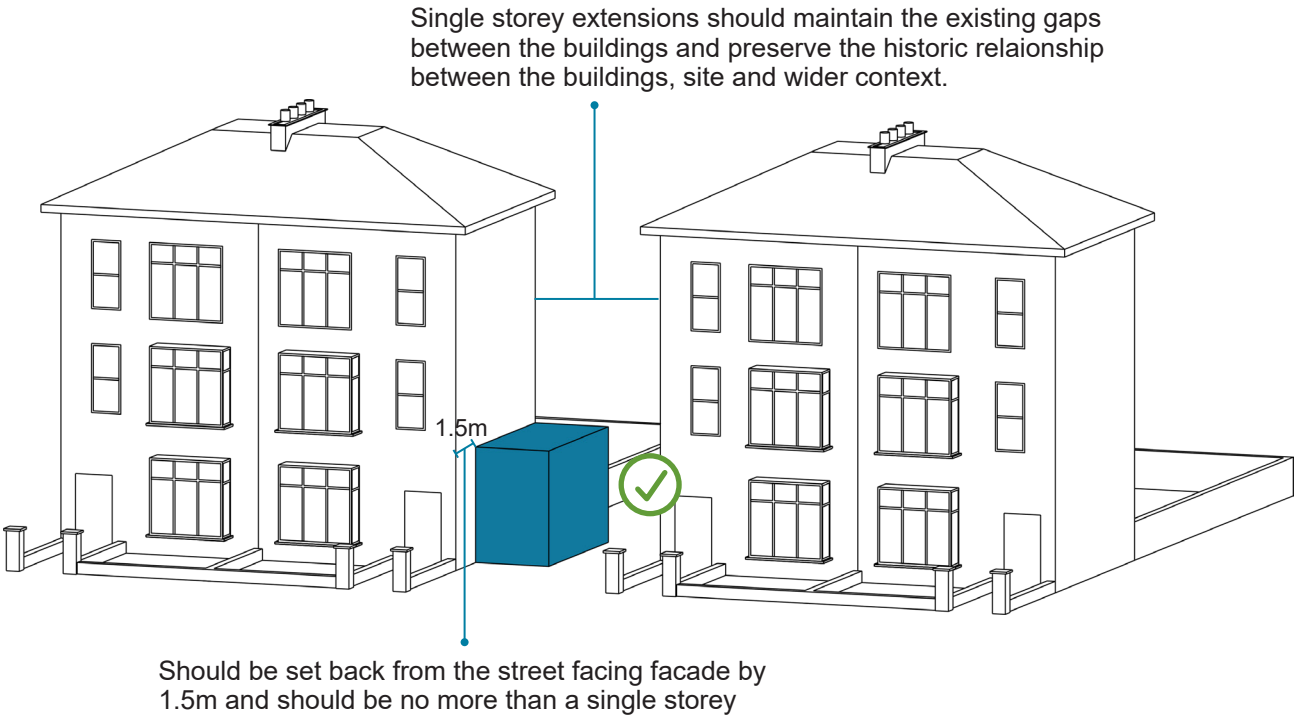


Figure 24: Single storey side extension

3.4.2 Two Storey Side Extension(s)

Two storey side extensions are not encouraged. The two-storey height is likely to have an impact on the character and setting of the street. Two storey side extensions must be designed to avoid a terracing effect, or the loss of the open character between properties. The extension should also be proposed with a roof style to match the existing property, as set out in Figure 25.

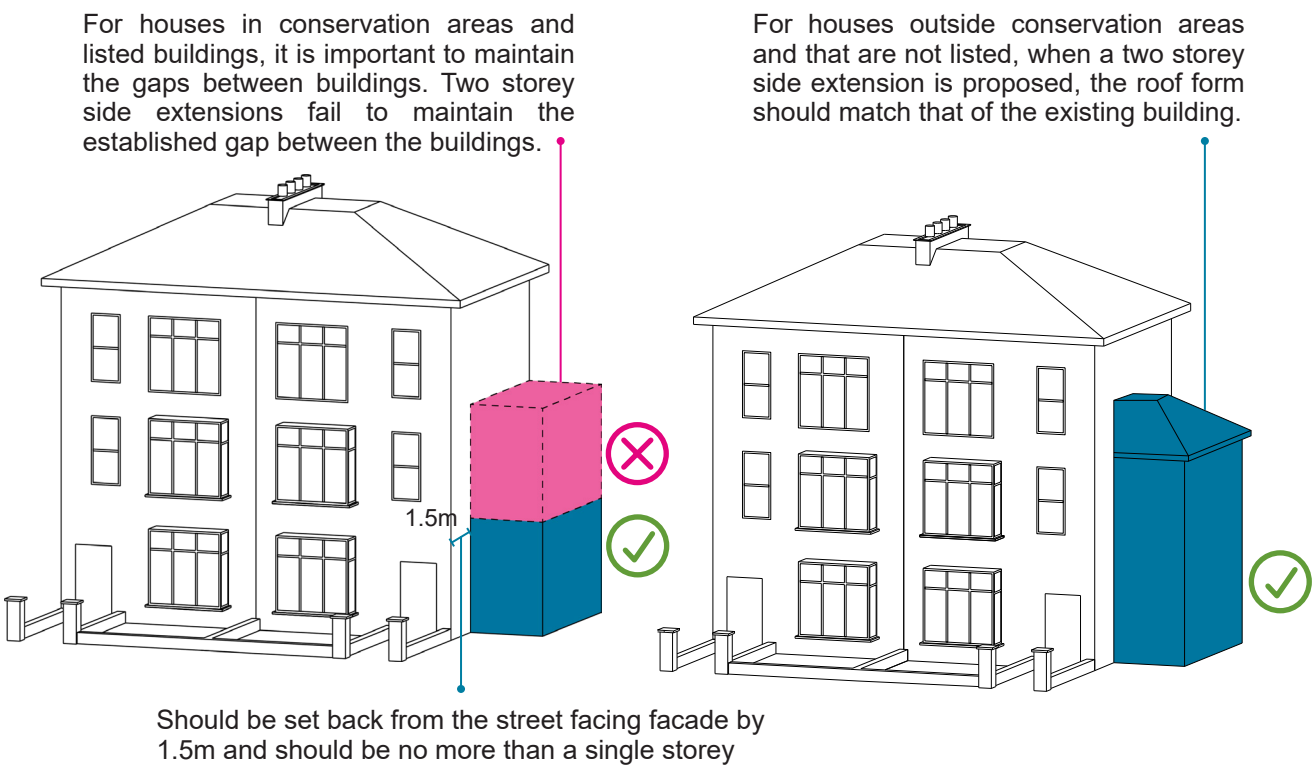


Figure 25: Two storey side extension

3.5 Rear extensions

Is permission required for a rear extension?

Houses	Flats/Maisonettes	Conservation Area	Listed Buildings
Permitted development applies within certain dimensions. Above this, Planning Permission will be required.	Planning Permission will be required.	Planning Permission will be required.	Listed Building Consent and Planning Permission will be required.

Table 14: 'Is permission required for a rear extension?'

Rear extensions are suitable for most housing types whether terraced, semi-detached or detached. Rear extensions should be designed to respect the character and scale of your existing home and are encouraged to be kept to a single storey.

You need to consider any change in ground levels between your home and any adjoining neighbours. This may result in the height of your extension appearing taller at these boundaries.

You will also need to ensure any extension does not cause unacceptable harm to the amenity of your neighbours. This guidance is set out in more detail in section 3.2.6.

3.5.1 Permitted development rear extensions

Permitted development allows for some homes to build a single storey rear extension without planning permission.

This is not applicable to homes which are flats, maisonettes, in a Conservation Area or listed.

Terraced and semi-detached house

A terraced or semi-detached home can be extended to the rear by up to 3m in depth and a maximum height of 4m (maximum height at the eaves of 3m), as set out in Figures 26 and 27.

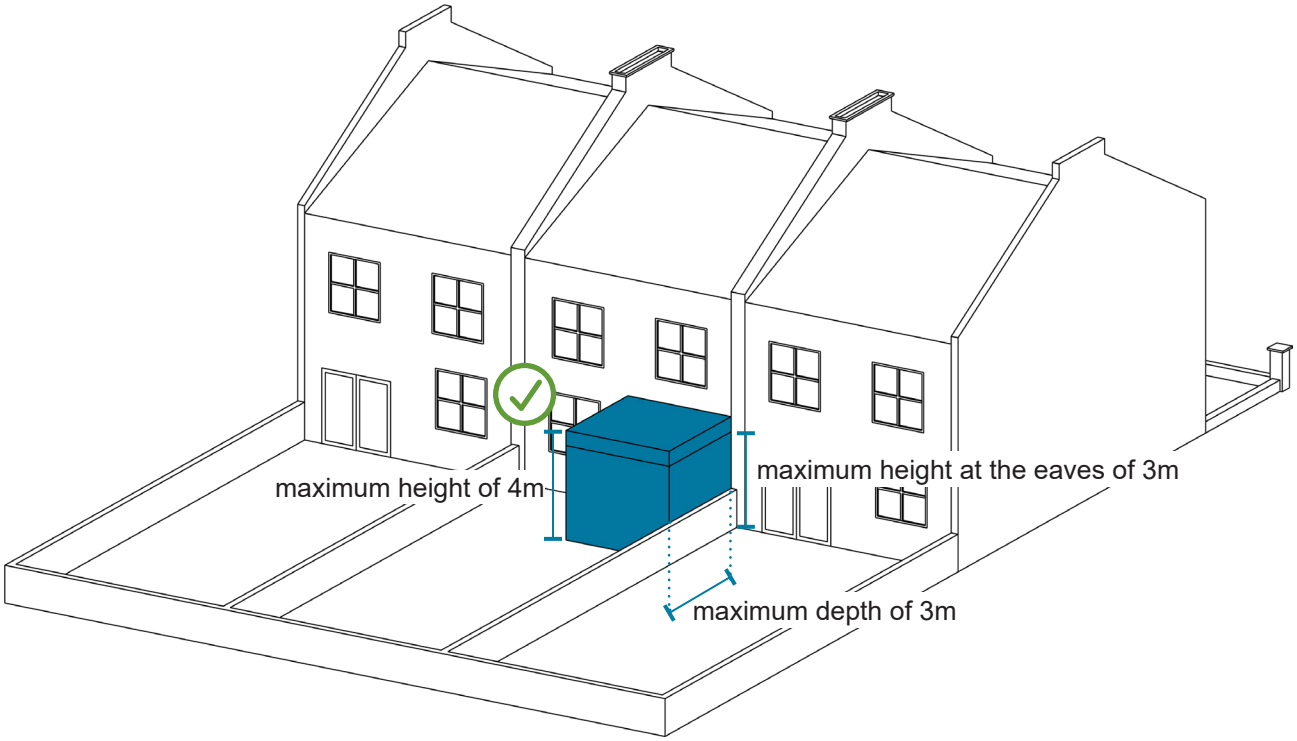


Figure 26: Rear extension at a terraced house

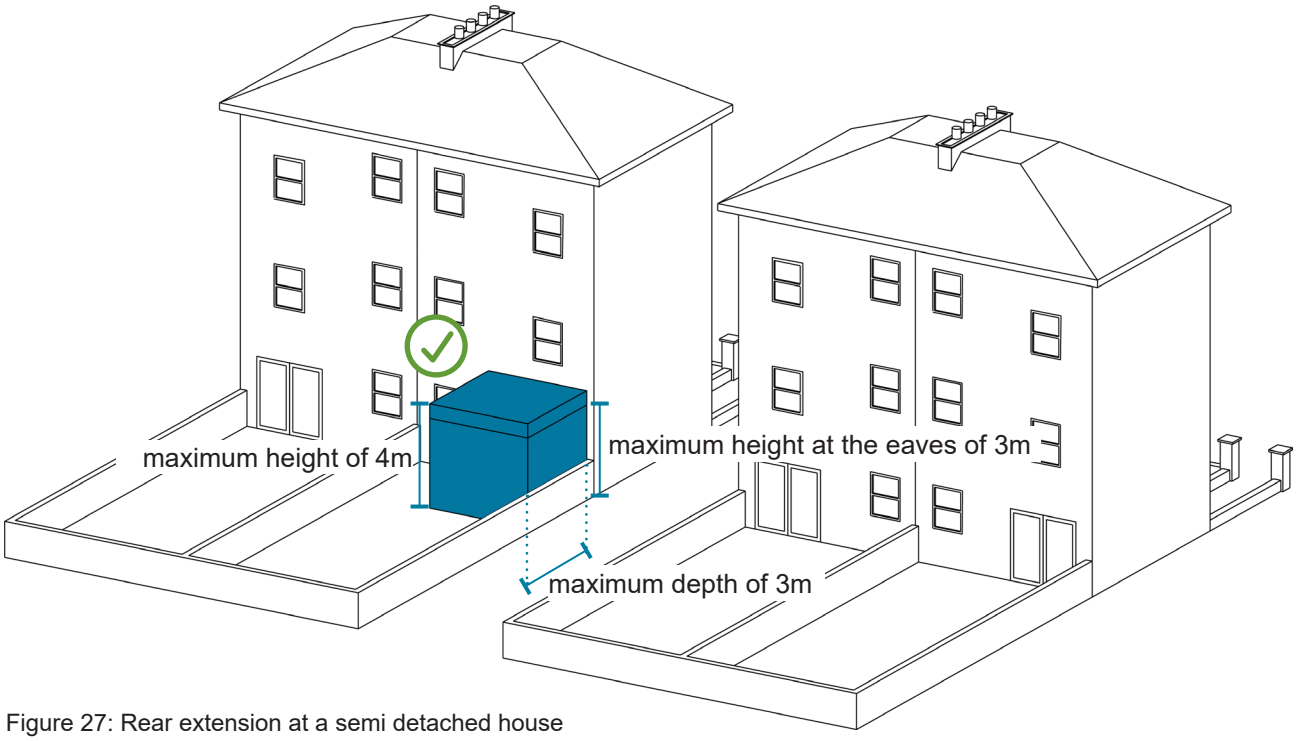


Figure 27: Rear extension at a semi detached house

Detached house

A detached house can be extended to the rear by up to 4m in depth with a maximum height of 4m (maximum height at the eaves of 3m) as set out in Figure 28.

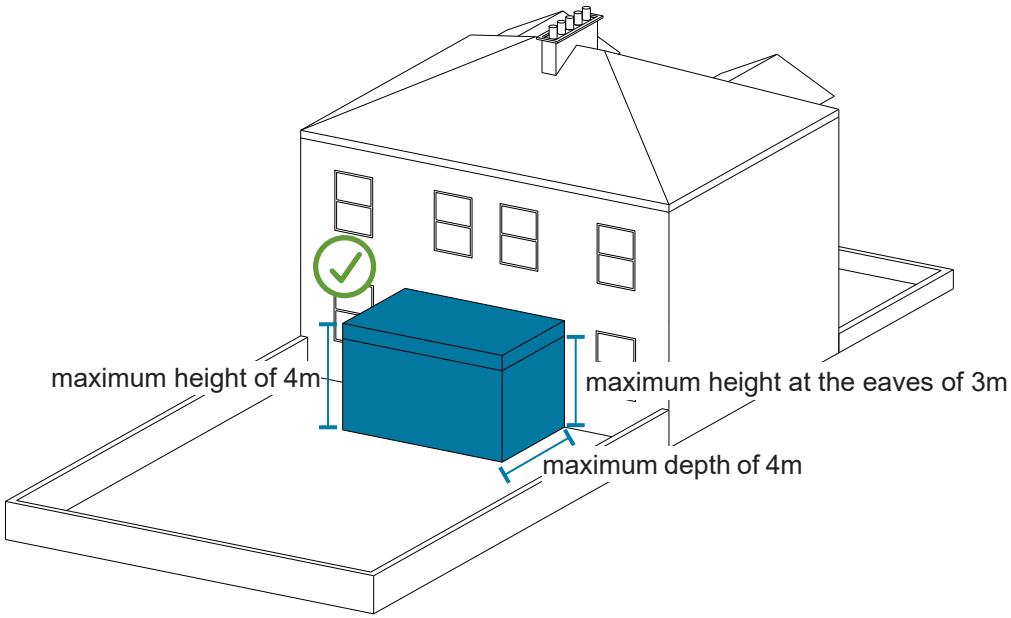


Figure 28: Rear extension at a detached house

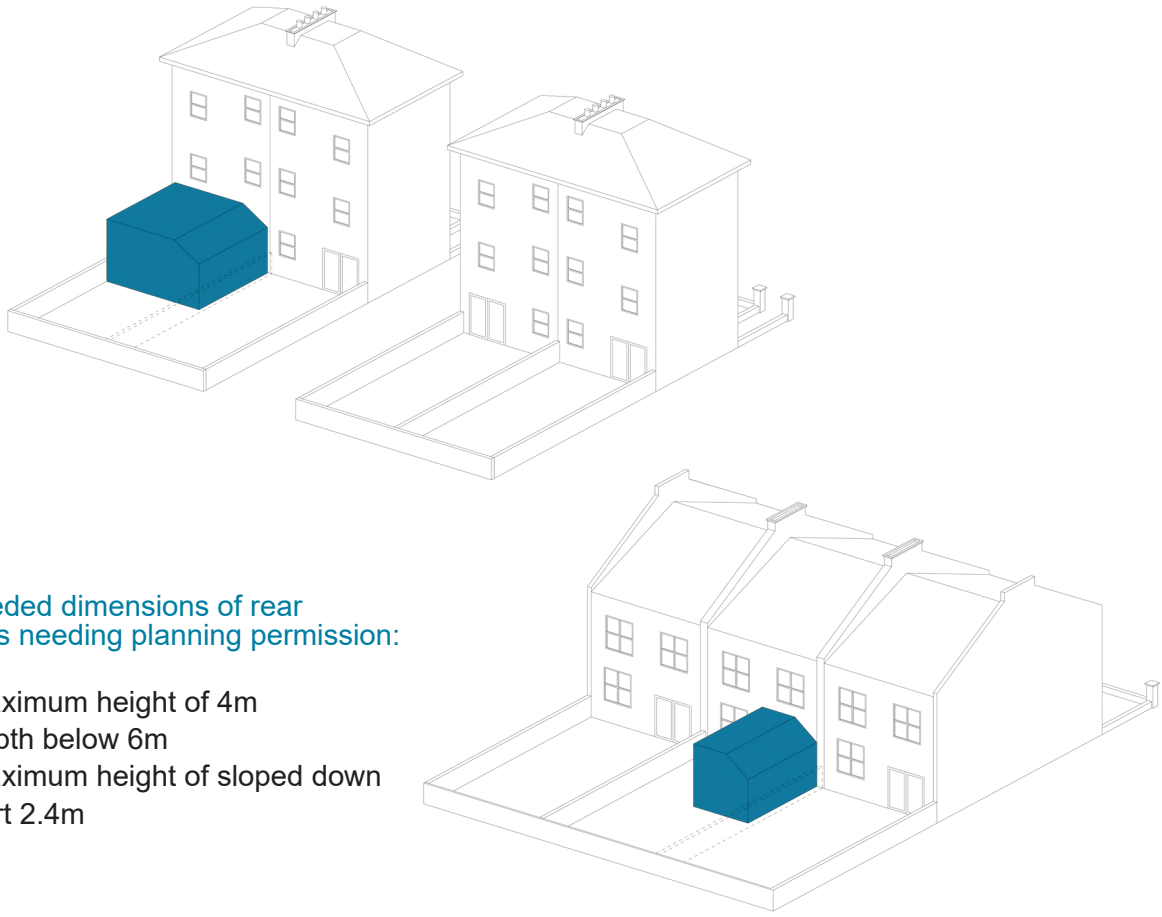
3.5.2 Rear extensions requiring planning permission

Beyond permitted development, you will need planning permission. Planning permission is also required for rear extensions if your home is a flat/ maisonette or within a Conservation Area. It is also needed alongside Listed Building Consent for listed homes.

Extensions between 3m-6m in depth need to consider the impact that may be caused to any neighbours, especially if the extension is on the boundary wall. We also encourage the roof to be designed to slope down towards the neighbouring property and to remain below 2.4m at this boundary for the entire length of the extension.

Extensions which exceed 6m in depth on the boundary are likely to be refused. These generally lead to an increased sense of enclosure at neighbouring properties, also reducing their access to daylight and sunlight.

Rear extensions must also not take up more than 50% of the total rear garden space at your home.



Recommeded dimensions of rear extensions needing planning permission:

- maximum height of 4m
- depth below 6m
- maximum height of sloped down part 2.4m

Figure 29: Rear extensions requiring planning permission

3.5.3 L-shaped or wrap around extensions

If your home includes an outrigger to the rear, as many traditional buildings in Southwark do, you may find the most appropriate solution is a L-shaped or wrap-around extension, as set out in Figure 31.

Outriggers generally have a window at the rear and care should be taken to ensure any proposed extension does not close off this source of light. A courtyard may need to be created within the extension to avoid blocking light to a room and to allow ventilation, as set out in Figure 31.

Wrap around extensions should remain no deeper than 6m on the boundary and stay below 2.4m at the eaves. The extension must also not take up more than 50% of the total rear garden space at your home.

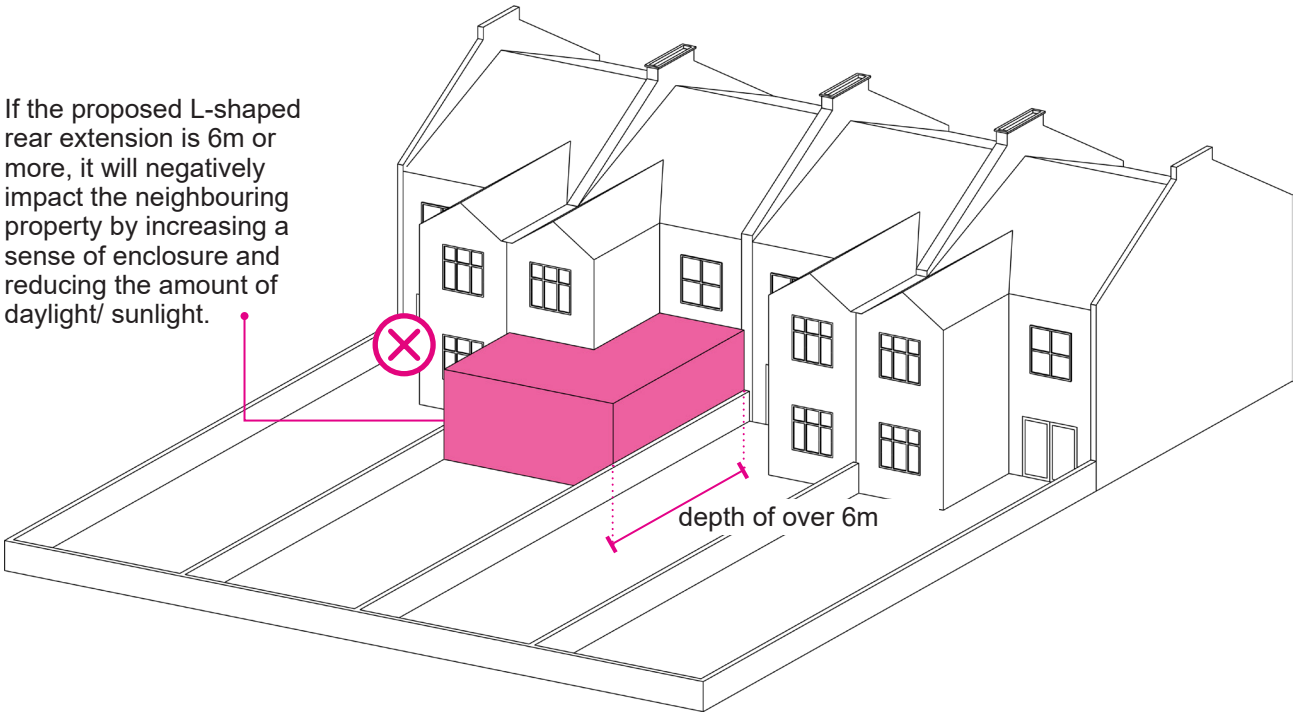


Figure 30: L-shaped or wrap around extension - poor example

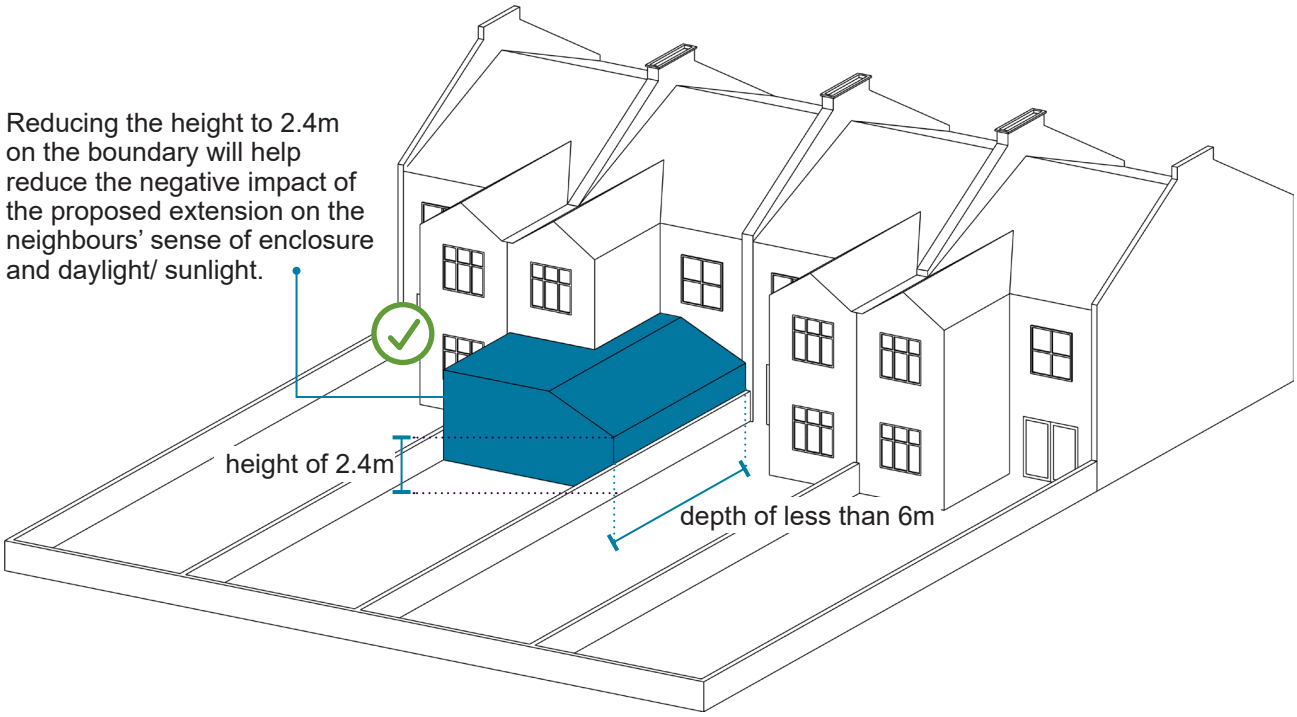


Figure 31: L-shaped or wrap around extension - good example

3.6 Roof extensions

Is permission required for a roof extension?

Houses	Flats/Maisonettes	Conservation Area	Listed Buildings
Permitted development applies within certain dimensions and roof works. Beyond this, Planning Permission will be required.	Planning Permission will be required.	Planning Permission will be required.	Listed Building Consent and Planning Permission will be required.

Table 15: 'Is permission required for a roof extension?'

Additional space can also be created at your home by extending your existing roof. There are two main types of roof extensions; mansard and dormer. You can also extend your roof by raising the ridge. Any extension which exceeds the highest part of the roof at your home will require planning permission. Roof extensions should remain subservient in scale to your existing home and not appear as a dominating feature.

3.6.1 Rear dormers outside of conversetion areas and for unlisted buildings

Permitted development allows you to extend your roof with a dormer up to 40 cubic m if a terraced property and 50 cubic m if it's a semi-detached or detached property. This is not applicable to homes which are flats, maisonettes, in a Conservation Area or listed.

Flats and maisonettes which are outside of conservation areas and unlisted can extend the roof with a dormer up to permitted development proportions, however planning permission will be required as permitted development rights do not apply.

The dormer extension should not be on the street facing roof slope and should not be taller than the highest part of the roof which is generally the ridge. It should be set back, as far as is practicable, at least 20cm from the original eaves. The 20cm distance is measured along the roof plane. The roof enlargement also cannot overhang the outer face of the wall of the original house.

3.6.2 Rear dormers requiring in conservation areas

Planning permission is required for roof extensions within a Conservation Area. It is also needed alongside Listed Building Consent for listed homes.

Dormer extensions in conservation areas should sit within the existing roof and should not dominate the existing roof form. This means the dormer should not significantly disrupt the rooflines and building heights of neighbouring buildings.

Rear dormers in conservation areas should also be:

- symmetrically located
- at least 0.5m below the ridge of the roof
- 1m above the eaves
- set in 1m from shared boundary and from the edge of the roof.

Overly large or box dormers will not be permitted in Conservation Areas or for Listed Buildings. These are not seen as sympathetic to the historic character of these homes.

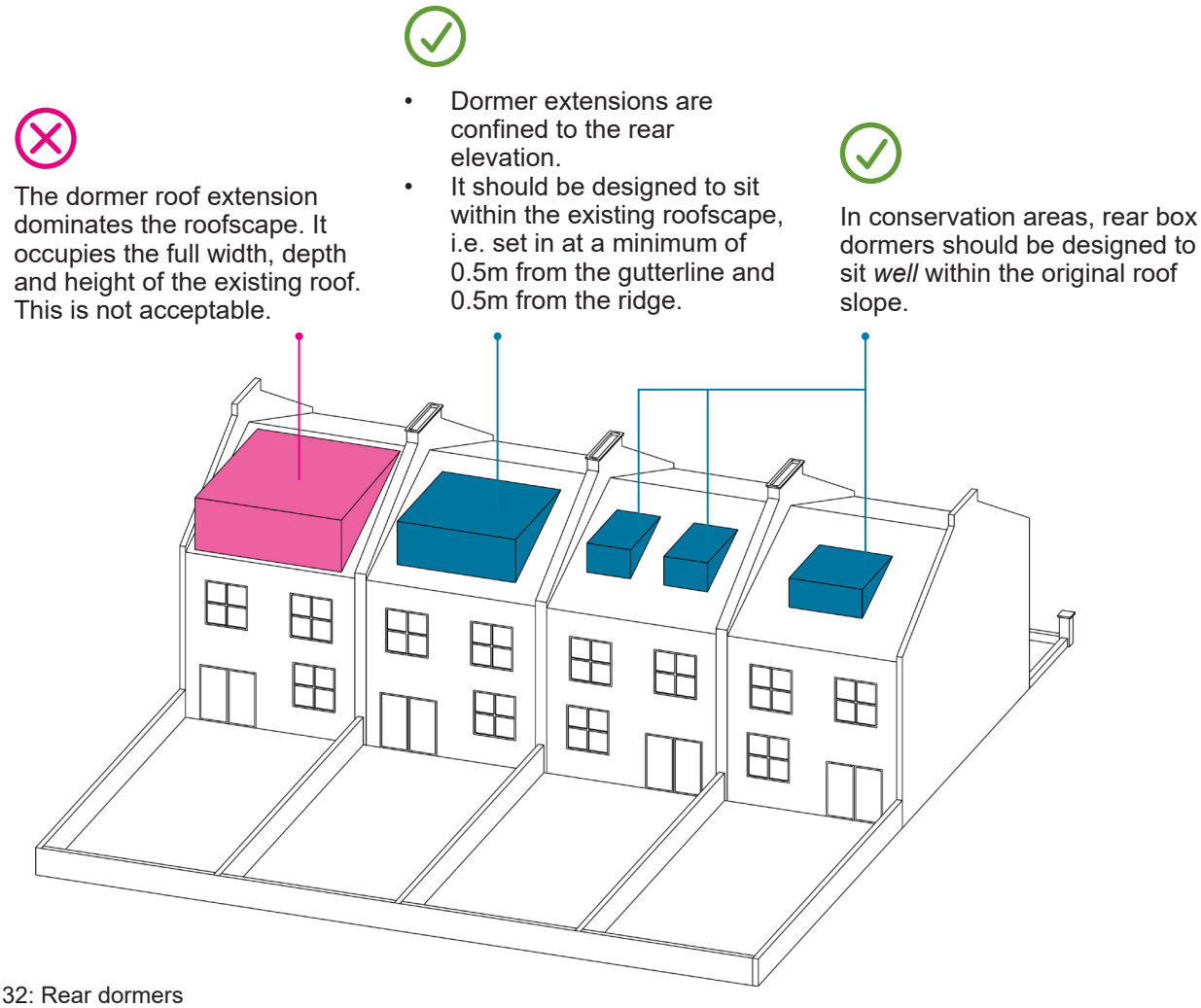


Figure 32: Rear dormers

3.6.3 Side dormers

Side dormers are not encouraged, unless they are an original or common feature of properties in that street. Side dormers should sit within the slope of the roof, well clear of any hips and verges.

3.6.4 Mansard extensions

All mansard extensions will require planning permission.

Mansard extensions should be designed to sit behind the front and rear parapet and should be at a maximum angle of 70 degrees. If your home is located on a street corner, the mansard should return to match the parapet. Mansard extensions will not be permitted if extending onto an outrigger.

A mansard extension will also not be permitted if disrupting the consistency of surrounding roof forms. For example, a mansard extension would not be permitted where there is an unbroken run of butterfly roofs, as set out in Figure 34.

Windows should follow the alignment and design of the existing windows on the upper floors of the house at the front and rear and should be designed as discrete dormer windows set within the roof-slope.

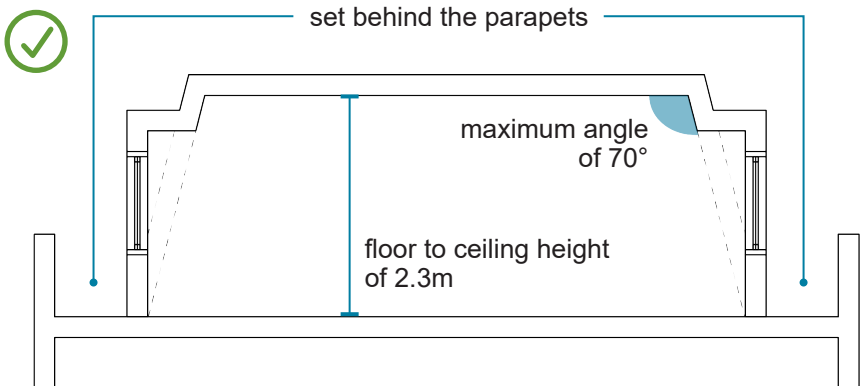


Figure 33: Mansard extension - good example

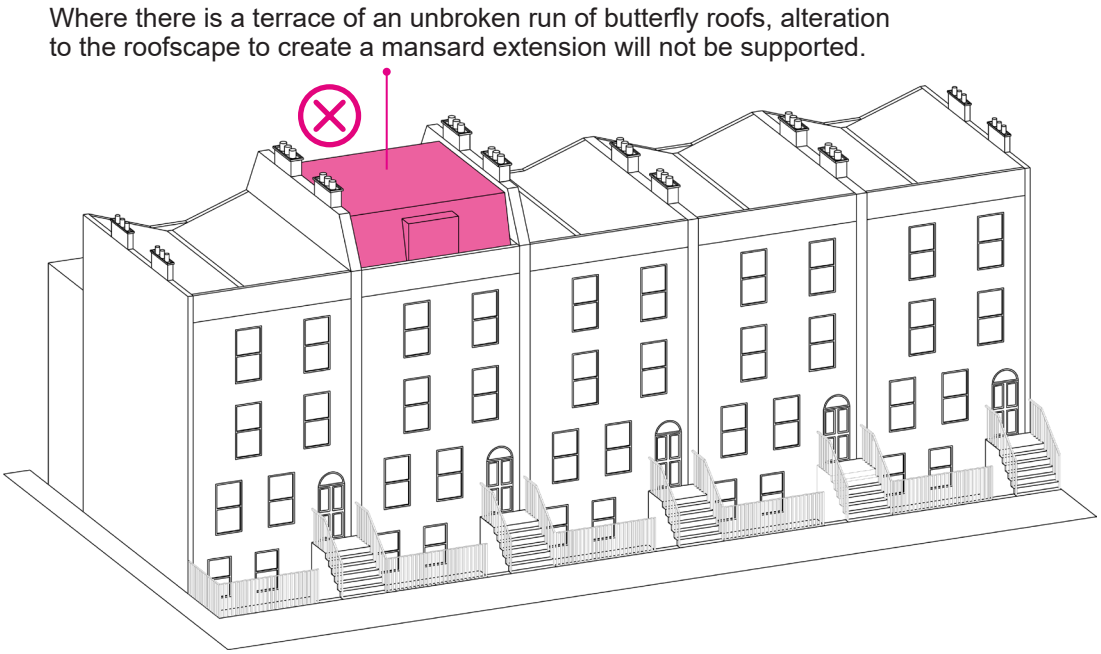


Figure 34: Mansard extension in an unbroken run of butterfly roofs - bad example

3.6.5 Ridge raises

Raising the roof ridge at your home will require planning permission. Listed Building Consent would also be required if your home is listed.

The ridge is the highest part of the roof and the line running the length of the roof, where the two roof slopes meet.

Ridge raises should be designed so that the slope of the front/street facing roof remains the same, as illustrated in Figure 35. To raise the ridge the front roof slope should be extended upwards, by no more than 300-400mm, with the gradient unaltered. The ridge raise should be accommodated within any roof chimneys and not visible beyond this. The ridge raise should also use like-for-like materials with the existing roof.

This is to ensure the ridge raise does not change the appearance of the roof from the street, and consistent rooflines are maintained in the area. This is especially important where there is a strong uniformity in roof forms or for homes which are listed or within Conservation Areas.

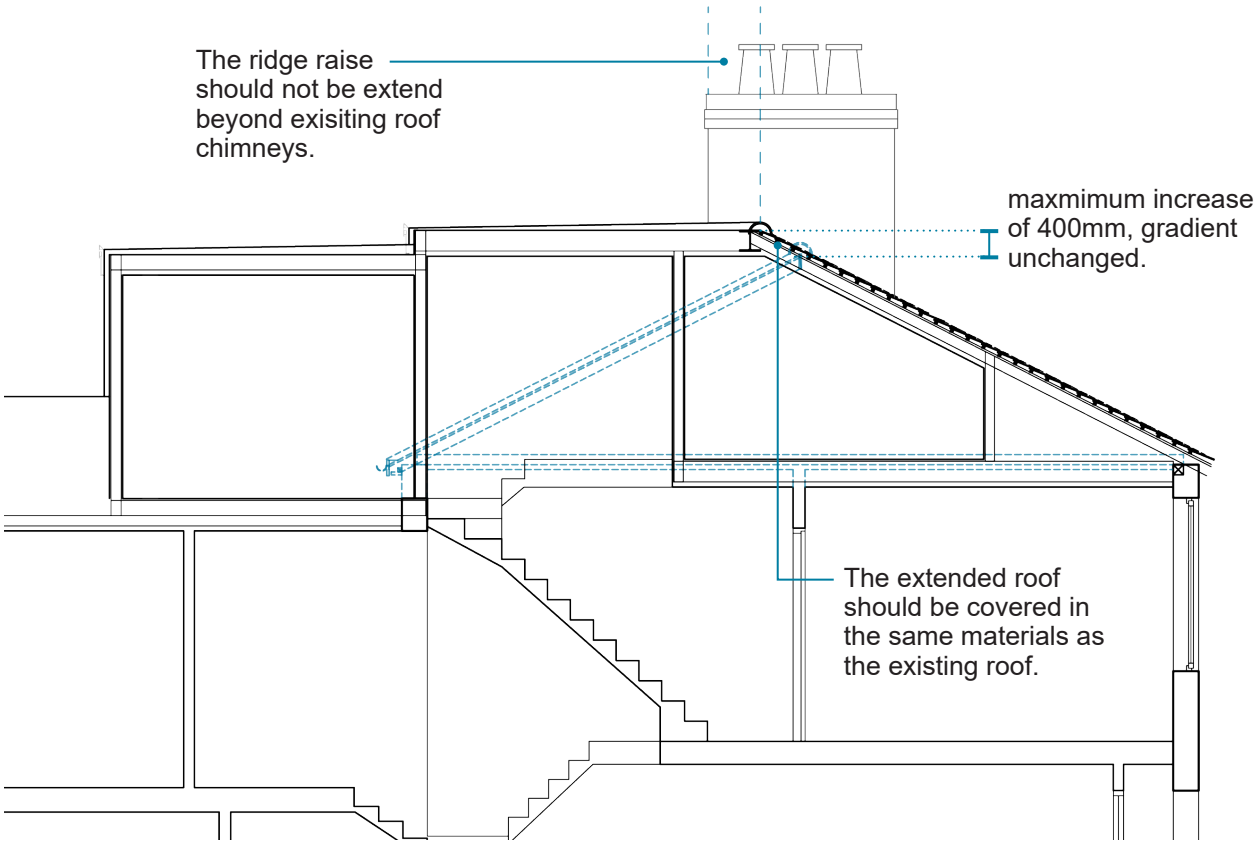


Figure 35: Ridge raise

3.6.6 Rooflights

Rooflights are a useful way to bring light and ventilation into your home and can have make a loft space more habitable.

Permitted development allows householders to install rooflights on street-facing roof slopes provided they are not more than 0.15m above the roof plane.

The size and number of rooflights should not dominate the existing roof. Rooflights are encouraged to be installed with a neat arrangement.

Within Conservation Areas, rooflights should sit flush with the roof slope and should not extend beyond the roof slope. Conservation style rooflights are also required to be used.

3.6.7 Terraces

Terraces can provide valuable amenity space, especially for flats that would otherwise have little or no private outside space. You need to consider the impact of a roof terrace on the amenity of your neighbours. Terraces can generate harmful noise disturbance and issues of overlooking to your neighbours when in use. The terrace should be setback to reduce the impact on your neighbours.

Where terraces allow for direct views into neighbouring properties, privacy screening should be used. Privacy screening should be no less than 1.7m in height. Perforated screening is preferred, but obscured glazing can also be used.

If proposing a balcony to sit within the existing roof, the existing parapet should be maintained, and any required screening should sit behind.

- Roof terraces should be designed to ensure they do not negatively affect daylight/ sunlight or privacy by way of overseeing neighbouring properties.
- They should be set back by at least 1.5m from the rear elevation and 1m from the side edges.
- A screening would be required to help restrict views out to preserve the amenity of the neighbouring properties. The proposed screening would need to be 1.7m in height.

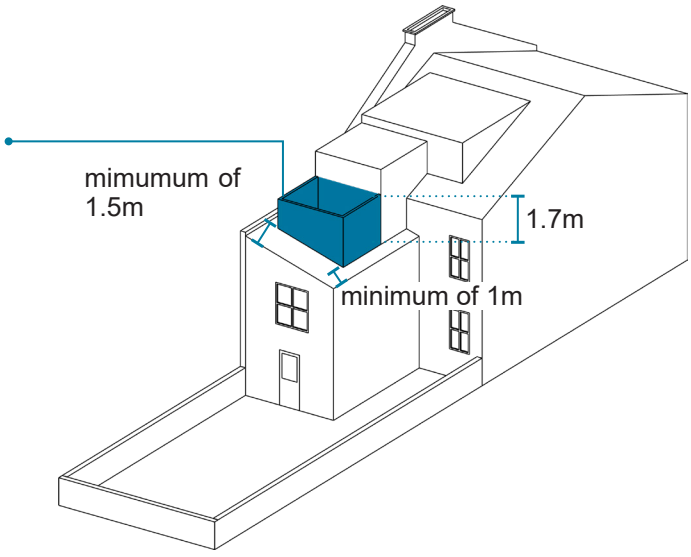


Figure 36: Roof terrace

3.7 Garden rooms and outbuildings

Is permission required for a garden room or outbuilding?

Houses	Flats/Maisonettes	Conservation Area	Listed Buildings
Permitted development applies within certain dimensions and roof works. Beyond this, Planning Permission will be required.	Planning Permission will be required.	Planning Permission will be required.	Listed Building Consent and Planning Permission will be required.

Table 16: 'Is permission required for a garden room or outbuilding?'

Garden rooms and outbuildings can provide useful additional space for your home. Within certain limitations permitted development will allow the installation of a garden room without requiring planning permission.

Where planning permission is required, we encourage garden rooms to have a depth of 3m, width of 5m, height of 4m with a height of 2.5m at the eaves at the maximum. This is to ensure that garden rooms remain subservient to the main building. The outbuilding also needs to be set in from the boundaries of neighbouring properties by 2m.

Garden rooms must also not take up more than 50% of the total rear garden space at your home.

Garden rooms should be designed as ancillary spaces to enhance the enjoyment of your home, and not create a new dwelling. This means the garden room should be accessed from within your existing garden, and not from a separate entrance. There should also be minimal plumbing or other services to the garden room. We may impose a planning condition or require a legal agreement to limit the use of any garden room in line with this.

Consideration also needs to be given to the impact a garden room may have on existing trees or root areas.

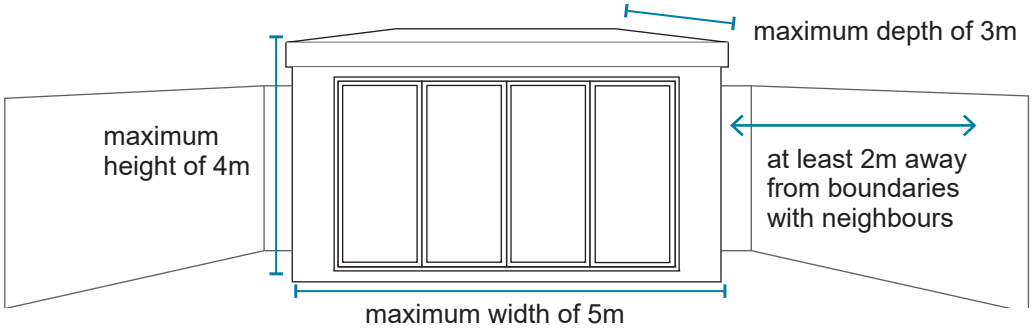


Figure 37: Garden room or outbuilding

3.8 Basement extensions

Is permission required for a basement extension?

Houses	Flats/Maisonettes	Conservation Area	Listed Buildings
Planning Permission will be required.	Planning Permission will be required.	Planning Permission will be required.	Listed Building Consent and Planning Permission will be required.

Table 17: 'Is permission required for a basement extension?'

Basement extensions create an opportunity to increase the footprint of your home. Planning permission is required for all homes to create a new or extend an existing basement. Listed Building Consent would also be required if your home is listed.

A Basement Impact Assessment (BIA) will need to be submitted alongside your application. The purpose of a BIA is to assess the impact of the development on your home, your neighbours and the environment.

You will need to submit a Flood Risk Assessment alongside your application if your home is located within a flood risk area. An Archaeological Assessment will also be required for homes within Archaeological Priority Areas and Sites of Archaeological Importance. You can check if your home is within any of these areas on Southwark Maps.

Basement extensions should not extend into or underneath the rear garden, from the principal rear wall to a depth of more than 50% of the garden. The extension should not extend to the front of the property to a depth of more than 30%. Basement extensions are also limited to no more than a single storey below ground.

Basement extensions should not dominate or result in an unacceptable loss of garden area at your home. You will also need to consider the existing trees at your home and your neighbours.

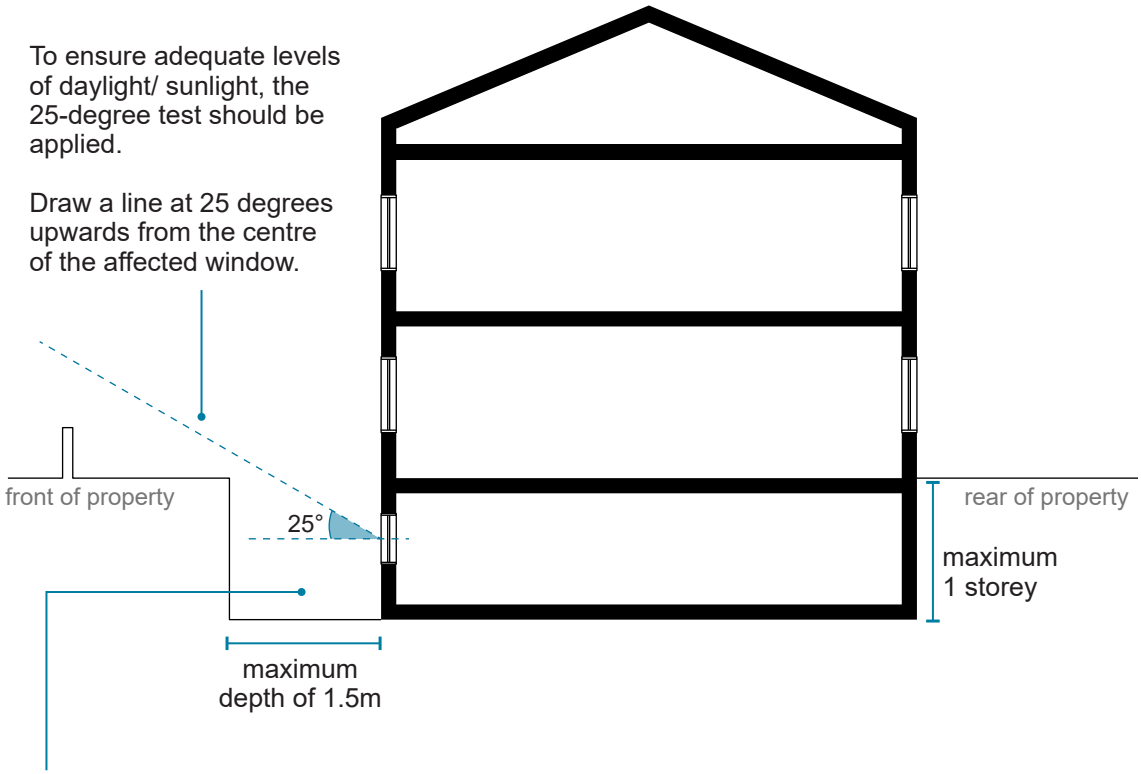
Basement rooms are encouraged for storage or utility rooms. Habitable rooms (such as living rooms or bedrooms) will only be permitted where it can be demonstrated there is sufficient access to light and ventilation and no flood risk.

3.8.1 Lightwells

Lightwells are common elements that form part of basements. Lightwells can allow better light and outlook into basements which would otherwise be of poor quality.

A Lightwell will only be permitted where already a common feature in a street or area. Lightwells may be discreetly located to the rear of the property as this would not be visible from the public domain.

- To ensure adequate levels of daylight/ sunlight, the 25-degree test should be applied.
- Draw a line at 25 degrees upwards from the centre of the affected window.



- Lightwells can be used to provide basement extensions with adequate levels of daylight/ sunlight and ventilation.
- They should have a maximum depth of 1.5m.

Figure 38: Lightwells

GLOSSARY

GLOSSARY

Active design: A concept that concerns how the design of buildings and streets can help people to lead more physically active and healthy lives.

Air source heat pump (ASHP): A device that transfers heat from the outside air to water. This in turn heats your rooms via radiators or underfloor heating. It can also heat water stored in a hot water cylinder for your hot taps, showers and baths.

Amenity: A positive element or elements that contribute to the overall character or enjoyment of an area. For example, open land, trees, historic buildings and the inter-relationship between them, or less tangible factors such as tranquillity.

Archaeology: Archaeology refers to buried archaeological finds, layers and features which are buried below the ground and not visible.

Architectural integrity: Architectural elements, materials, colour, and quality of the original building construction.

Architectural interest: In listed buildings this refers to buildings that are important to the nation because of their architectural design, decoration and craftsmanship. Important examples of significance include plan forms, particular building types and techniques such as using cast iron, the early use of concrete and early prefabricated buildings.

Arrangement: Arrangement refers to how the key frames are arranged in a window or door.

Article 4 Direction: A direction made under Article 4 of the Town and Country Planning (General Permitted Development) (England) Order 2015 which withdraws permitted development rights granted by that Order.

Balustrade: A railing or wall on a balcony or staircase, supported by balusters (short decorative pillars).

Basement Impact Assessment (BIA): A technical report that assesses the impact of a proposed basement on the rest of the building, neighbouring properties and the environment.

Biodiversity: The variety of animal and plant life that exists in a certain place.

Brick slips: Specially manufactured tiles which when installed have the appearance, colour and texture of a real clay brick wall.

Built heritage: Built Heritage means all the heritage places and features that survive as buildings or structures above ground and are visible and visitable.

Butterfly roof: A roof with two roof surfaces sloping down from opposing edges to a valley near the middle of the roof.

Casement window: A window that is attached to its frame by one or more hinges at the side.

Cavity wall: A type of wall that has a hollow centre.

Certificate of Lawfulness: A formal confirmation from a local planning authority that on the date of issuing the Certificate the use of the land or the development of it is lawful.

Classified roads: Refers to A roads, B roads, as well as some classified un-numbered roads (known unofficially as C roads). By contrast, unclassified roads are local roads intended for local traffic.

Condition survey: A survey carried out by a professional to identify what work is needed to maintain a property and how much this might cost. This may include building structure, roofs, sewage and drainage, electrics, fire safety, asbestos etc.

Conservation: The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.

Conservation Areas: These are areas of special architectural or historic interest whose character or appearance is protected. They have to be formally designated under the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Context: Context refers to the setting of a site or area, including factors such as townscape, built form, land use, activities, heritage and vehicular and pedestrian movement.

Cornice: A decorative feature in the corner of a room where the walls and ceiling meet.

Crittall: A well-known manufacturer of steel doors, windows and internal screens.

Depth of reveal: The distance between the outer edge of the window or door frame and the interior wall surface.

Dormer: A window that projects vertically from a sloping roof.

Double Glazing: Windows that have two panes of glass, separated by a sealed gap, which reduces heat transfer.

Eaves: The part of a roof that meets or overhangs the walls of a building.

Elevation: A side of a building.

Fenestration: The arrangement of windows in a building.

Flush: Completely level or even with another surface.

Gable: The triangular upper part of a wall at the end of a ridged roof.

Gable roof: A roof with at least one flat end.

Glazing bars: Rigid bars that connect two separate panes of glass.

Glazing type: Glazing type refers to whether a window or door is single, double or triple glazed.

Green infrastructure: A network of habitats which is often multifunctional and can provide a range of benefits to improve mental health, active lifestyles, recreation, food growing, enhanced biodiversity and ecological resilience, flood risk management, temperature regulation and improved air and water quality.

Ground source heat pump (GSHP): A device that transfers heat from the ground outside your home to heat your radiators or underfloor heating. It can also heat water stored in a hot water cylinder for your hot taps and showers.

Habitable room: A room that provides living accommodation, such as a bedroom, living room, dining room, study or conservatory. Bathrooms, kitchens that do not include dining space, storerooms and utility rooms are not habitable rooms.

Harm: Harm in planning terms means something that may damage a heritage asset or result in a loss of significance.

Heritage: Heritage includes all inherited resources which people value for reasons beyond mere utility. These are cultural inherited assets which people identify and value as a reflection and expression of their evolving knowledge, beliefs and traditions, and of their understanding of the beliefs and traditions of others.

Heritage asset: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest.

Hip: The sharp edge of a roof from the ridge to the eaves where the two sides meet.

Hip roof: A type of roof where all sides slope downwards to the walls, usually with a fairly gentle slope.

Historic environment: A very general term used to refer to everywhere around us that has something significant about it. It is defined by the NPPF as: ‘all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged and landscaped and planted of managed flora.

Historic integrity: The ability of a building to convey its historic significance, including materials, design, feeling, location, association, workmanship, and setting.

Historical interest (buildings): This refers to buildings that have important aspects of the nation's social, economic, cultural or military history, such as industrial buildings, railway stations, schools, hospitals, theatres, and town halls.

In situ: In the original place.

Joinery: Wooden components (e.g. of a window frame).

Lawful Development Certificate: See Certificate of Lawfulness.

Lightwell: A shaft or open space that lets light into a building, often the basement.

Listed Building: A building or structure which is considered to be of 'special architectural or historic interest'. This includes a wide variety of structures and buildings. There are three grades of listing depending on the importance of the building.

Listed Building Consent: Permission that must be obtained from the council for any works to a listed building that would affect its special architectural or historic interest.

Locally Listed Building: A building, structure or feature which is not statutorily listed but is important in the local context owing to its special architectural or historic interest or its townscape or group value. The protection of local heritage is important because it enhances the value of Southwark's built environment, but also maintains a sense of local distinctiveness which can assist with regeneration and place-making.

London Plan: The London Plan 2021 is the Spatial Development Strategy for Greater London. It sets out a framework for how London will develop over the next 20-25 years.

Maisonette: A two-storey flat with its own front door.

Mansard extension: A way of adding extra space to a house by building a mansard roof, effectively adding an extra floor to the property.

Mansard roof: A mansard roof is a type of roof which combines elements of a gambrel roof and a hip roof. Like a gambrel roof, a mansard roof has two slopes on each side, with the upper being less steep and shorter than the lower slope. Unlike a gambrel roof, however, a mansard roof has slopes on all four sides.

Massing: Massing refers to the combined effect of the height, bulk and silhouette of a building or group of buildings.

National Planning Policy Framework (NPPF): The NPPF sets out government's planning policies for England and how these are expected to be applied.

Net zero (carbon): Activity that causes no net release of carbon dioxide and other greenhouse gas emissions into the atmosphere.

Obscure glazing / obscure glass: Glass that is patterned or frosted to reduce transparency, meaning you cannot see through it clearly.

Outbuilding: A smaller separate building such as a shed that belongs to a main building, such as a house

Outlook: A view (out of a window).

Outrigger: The part of a terraced house, usually incorporating the kitchen area, that projects out of the back of the house. These are common in Victorian and Edwardian homes built in London, including in Southwark.

Parapet: A low protective wall along the edge of a roof, bridge, or balcony.

Party wall: A wall shared by two adjacent properties.

Permitted development: Development that does not require planning permission to be carried out.

Photovoltaic panels (PVs): Solar panels that generate electricity (as opposed to solar thermal panels, which are used to provide hot water).

Rafter: A rafter is a structural component used in the construction of a roof. It is a sloping beam that supports the weight of the roof and transfers it to the walls or other supporting structures of a building.

Render: A first coat of plaster applied to a brick or stone surface.

Ridge: The line or edge formed where the two sloping sides of a roof meet at the top.

Sash window: A window that slides open vertically or horizontally, rather than using a hinge.

Reveal: The portion of a wall opening that is exposed when a window or door is installed. It is the area between the outer edge of the window or door frame and the adjacent wall surface.

Rooflight: A window built into a roof.

Scheduled monument: A nationally important historic building (or archaeological site) that is protected against unauthorised change.

Secondary glazing: The installation of a separate internal window on the inside of the existing window. This replicates the airtight seal and insulation gap offered by double glazing.

Shingles: A roof covering consisting of individual overlapping tiles.

Streetscape: The appearance or design of a street.

Stucco: A cement-type mixture made of Portland cement, lime, sand and water. It is a thin finish coat that goes on the outermost layer of buildings.

Stud wall: A partitioning wall made from a stud (timber) frame with plasterboard nailed over the top.

Supplementary Planning Documents (SPDs): SPDs explain how current planning policies in the Local Plan will be applied. They also contain background information applicants may find useful when preparing their planning applications.

Sympathetic: Designed in a sensitive and appropriate way (in relation to the wider building or streetscape).

Thermal performance: Thermal performance means how well a building retains heat.

Tree Protection Order (TPO): An order made by a local planning authority in England to protect specific trees, groups of trees or woodlands in the interests of amenity.

Townscape: The visual appearance of an urban area.

U-value: A useful metric to compare different insulating products. It indicates how much heat is lost through a given thickness of material, accounting for conduction, convection and radiation. The lower the U-value, the better the material is as a thermal insulator. Part L of the Building Regulations includes target U-values for domestic properties.

Vehicle crossover: A Vehicle crossover, also known as a Dropped or Lowered Kerb, provides the legal means for motor vehicles to access a property. To create a vehicle crossover, a section of kerb is lowered (known as a ‘dropped kerb’) and a driveway is created linking the road to property, and/or a site.

Ventilation: The provision of fresh air to a room or building.

Verge: The edge of tiles projecting over a gable.

Visual impact assessment (VIA): A visual impact assessment illustrates how the proposed works would appear on your home and in views from the surrounding area. The assessment should be proportionate to the scale of the works, sensitivity of the property and its location (whether it is listed or in a conservation area, or panels are public facing).

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SECTION 106 AND COMMUNITY INFRASTRUCTURE LEVY

SUPPLEMENTARY PLANNING DOCUMENT (SPD)

JULY 2025

FOREWORD

New developments can bring significant benefits to our borough, so long as we are clear about our expectations in planning policy, and have the right processes in place for monitoring our requirements and delivering any in lieu provision.



This new Supplementary Planning Document (SPD) aims to support our policies as set out in the Southwark Plan, giving further guidance across key thematic areas and updating the rates for in lieu payments, to ensure that we can meet the cost of delivery, for example, around play provision and much needed affordable housing.

I am delighted that we are publishing this new guidance to support the implementation of the Southwark Plan and would encourage readers to also go through our latest Infrastructure Funding Statement which provides more detail on recent projects delivered through development including work to Cossall Park, Lower Road Cycle Infrastructure, improvements to the Thames Path, and the installation of a new mosaic at London Bridge station. By bringing forward this SPD, we are ensuring that we can secure even greater benefits for Southwark neighbourhoods over the coming years.

Councillor Helen Dennis
Cabinet Member for New Homes and Sustainable Development
Southwark Council

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1. INTRODUCTION

This section provides an overview of the Supplementary Planning Document. It sets out how Section 106 planning obligations and Community Infrastructure Levy (CIL) are used, and how they differ. It includes a summary of the financial and non-financial section 106 planning obligations which may be required.

1.1 Overview

This Supplementary Planning Document (SPD) provides detailed guidance on the use of Section 106 planning obligations and the community infrastructure levy.

It sets out:

- The requirements for mitigating any impacts of development using Section 106 planning obligations and CIL.
- How Section 106 (S106) planning obligations arise and are secured.

Development should meet the requirements set out in the Southwark Plan 2022, unless material considerations indicate otherwise. However, it is acknowledged that this may not be possible in all cases.

This SPD sets out that impacts from a development must be mitigated on-site or off-site. Where this is not possible, a financial contribution may be required in accordance with the National Planning Policy Framework.

This SPD replaces the S106 Planning Obligations and CIL SPD (2015), amended in November 2020.

1.2 What is a Section 106 planning obligation?

Section 106 planning obligations are used to mitigate the impacts of a development. They are usually contained in a legally binding Section 106 agreement between a council and parties with a legal interest in the land which planning permission has been applied. A unilateral undertaking may also be entered into without the local planning authority.

Planning obligations can be used to specify the nature of development, compensate for loss or damage by a development or secure financial contributions. Almost all development has some impact on the need for infrastructure, services and amenities.

All Section 106 planning obligations must meet the tests set out in Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended). This states that a planning obligation may only be a reason for granting planning permission for the development if they are:

- 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.

If a change is made to an approved planning application, planning obligations in the legal agreement may need to change. Where that is required by the council, this will be done by a deed of variation.

1.3 How is indexation applied?

To ensure all Section 106 planning obligations continue to cover the actual cost of delivering infrastructure, they will be subject to indexation. The council will use the Building Cost Information Service Index (BCIS) General Building Costs Index for section 106 planning obligations relating to construction, or Consumer Price Index (CPI) for all other S106 planning obligations.

Indexation is applied from the date of the Section 106 legal agreement being signed and it can only increase. Legal clauses to secure the indexation of the amounts agreed will be included in the Section 106 planning obligation. Indexation is calculated using the formula below:

(£ s106 financial contribution) × (Indexation rate at the date the financial contribution is due) divided by (Indexation rate on the date of the Section 106 Legal Agreement)

1.4 How are Section 106 planning obligations spent?

The money is spent on projects in accordance with the purposes for which they have been paid. Infrastructure Funding Statements identify projects for CIL and funding from Section 106 planning obligations[1]. The total money received from CIL and S106 during the reported year is in the council's Infrastructure Funding Statement. This also sets out the projects funded from Section 106 planning obligations.

1 The Community Infrastructure Levy (Amendment) (England) (No. 2) Regulations 2019).

1.5 Section 106 planning obligations fees

Tables 1-5 summarise the financial Section 106 planning obligations and Table 6 summarises the non-financial Section 106 planning obligations the council expects.

These are based on policy requirements from the Southwark Plan 2022 and London Plan 2021.

Application types

- Minor applications: 1-9 homes; 0-999 sqm commercial floorspace
- Small scale major applications: 10-49 homes; 1,000-3,499 sqm commercial floorspace
- Large scale major applications (lower range): 50-99 homes; 3,500-9,999 sqm commercial floorspace
- Large scale major applications (update range): 100 or more homes; 10,000 sqm and over commercial floorspace

Financial obligations

Section 106 administration and compliance fee and Community Infrastructure Levy (CIL)

Type of fee	Minor applications	Small scale major applications	Large scale major (lower range) applications	Large scale major (higher range) applications
Section 106 administration and compliance fee	£1,000	£5,000	£15,000	£20,000
Community Infrastructure Levy (CIL) (included in the CIL charging schedule)	Case by case basis	Case by case basis	Case by case basis	Case by case basis

Table 1: Section 106 administration and compliance fee and Community Infrastructure Levy (CIL)

S106 Submission Fees where council approval is required

Technical fee	£561.50 to make a planning decision or approval of a matter within a Section 106 agreement which needs a planning decision or approval.
Non-technical or notification fee	£116 to record notifications where no decision is needed, but where a fact needs to be noted and recorded. These will usually be milestones in the development, such as confirmation of implementation or that a specific action has occurred.
Non-compliance fee	Additional charge of £300 if a S106 clause has not been discharged and the S106 team have to notify the developer. This is in addition to the cost for discharging a planning obligation. Any follow up correspondence and enforcement action will be charged at £120 per hour plus disbursements and costs.

Table 2: Submission fees

Monitoring and Compliance fees

Type of fee	Minor applications	Small scale major applications	Large scale major (lower range) applications	Large scale major (higher range) applications
Travel Plan	Not applicable	£2,790 per applicable application	£2,790 per applicable application	£2,790 per applicable application
Delivery and Servicing Management	Not applicable	£2,790 per applicable application	£2,790 per applicable application	£2,790 per applicable application
Biodiversity Net Gain monitoring fee (if assessed as significant)	From £12,874	From £12,874	From £12,874	From £12,874
Construction and Environment Management Plan	Not applicable	£2,100 per application plus fee calculated on a case-by-case basis.	£3,200 per application plus fee calculated on a case-by-case basis.	£3,200 per application plus fee calculated on a case-by-case basis.
Affordable housing monitoring fee	£150 per affordable home	£150 per affordable home	£150 per affordable home	£150 per affordable home

Table 3: Monitoring and Compliance fees

Specialist technical support fees

Type of fee	Minor applications	Small scale major applications	Large scale major (lower range) applications	Large scale major (higher range) applications
Supporting the local economy	£3,710 charged to applications which are required to provide jobs and training and / or affordable workspace	£3,710 charged to applications which are required to provide jobs and training and / or affordable workspace	£3,710 charged to applications which are required to provide jobs and training and / or affordable workspace	£3,710 charged to applications which are required to provide jobs and training and / or affordable workspace
Construction and highways	Not applicable	Network management fee post-approval	Network management fee post-approval	Network management fee post-approval
Conservation and restoration management	£3,598	£7,196	£7,196	£7,196
Type of fee	**Under 100sqm**	**101 - 3,499sqm**	**3,500 - 9,999sqm**	**10,000sqm and above**
Archaeology	£3,598 - £4,360	£7,196 - £8,635	£9,624 - £11,549	£14,391 - £17,270

Table 4: Specialist technical support fees

Payment in lieu if the policy requirement cannot be met on site

Type of fee	Minor applications	Major applications
Social rented and intermediate homes	Number of habitable rooms x 0.35 x £ per habitable room (depending on CIL zone)	Number of habitable rooms x 0.35 x £ per habitable room (depending on CIL zone)
Social rented and intermediate homes	Per habitable room: CIL Zone 1 & 2 - £100,000; CIL Zone 3 - £82,000	Per habitable room: CIL Zone 1 - £250,000; CIL Zone 2 - £130,000; CIL Zone 3 - £100,000
Self and custom build homes	£30,000 per habitable room (all CIL zones)	£30,000 per habitable room (all CIL zones)
Wheelchair accessible homes	Not applicable	Number of habitable rooms required x £10,000
Jobs and training in construction	Not applicable	Shortfall x £200 (short courses) / £2,000 (apprenticeships) / £5,500 (employment during construction) (not applicable to developments under 500 sqm GEA)
Jobs in completed developments	Not applicable	Shortfall against required number of jobs for unemployed Southwark residents lasting minimum 26 weeks x £5,500
Net zero carbon development	Not applicable	£95 per tonne of carbon x Total Carbon shortfall x 30 years
Air quality neutral standards	Excess emissions above the benchmark (tonnes/ annum) x the damage costs (£/tonne) over a 30 year period, with a 2% annual uplift Exemptions for applications are set out in the Air Quality Neutral LPG guidance.	Excess emissions above the benchmark (tonnes/ annum) x the damage costs (£/tonne) over a 30 year period, with a 2% annual uplift Exemptions for applications are set out in the Air Quality Neutral LPG guidance.
Tree management and replacement	Calculated using the CAVAT methodology, UBoC model or other assessment agreed by the council. £275 per new tree planted which requires protection, management or maintenance.	Calculated using the CAVAT methodology, UBoC model or other assessment agreeddetermined by the council £275 per new tree planted which requires protection, management or maintenance.
Affordable workspace	Use affordable workspace calculator	Use affordable workspace calculator

Type of fee	Minor applications	Major applications
Loss of employment floorspace	10% potential jobs lost: £5,500 per job	10% potential jobs lost: £5,500 per job
Amenity, play space and open space	Shortfall in amenity space, child play space or open space (sqm) x £325	Shortfall in amenity space, child play space or open space (sqm) x £325
Social, community and other infrastructure	Case by case basis	Case by case basis
Transport, public realm and highways	Case by case basis. Specific fees apply for Old Kent Road Opportunity Area.	Case by case basis. Specific fees apply for Old Kent Road Opportunity Area.

Table 5: Payment in lieu if the policy requirement cannot be met on site

* Major development includes major residential development (10 or more homes), student housing, co-living developments, and private rented homes.

Non-financial section 106 planning obligations

Type of obligation	Minor applications	Major applications
Affordable housing (on site) including student housing (P1, P3-P7, P9)	All housing developments must provide social rented and intermediate housing	All housing developments must provide social rented and intermediate housing
Wheelchair accessible homes (P8)	All housing development must provide wheelchair accessible homes	All housing development must provide wheelchair accessible homes
Affordable workspace (P31)	Commercial development over 500sqm (including extensions) must provide 10% affordable workspace	Commercial development over 500sqm (including extensions) must provide 10% affordable workspace
Jobs in completed developments (P28)	Not applicable	All non-residential floorspace (over 2,500 sqm) is required to provide employment and training for unemployed Southwark residents
Local procurement (P28)	Not applicable	Development over 1,000 sqm must prioritise local business for the procurement of goods and services
Net zero carbon development (P70)	Not applicable	Residential: reduce carbon emissions by 100% on Part L 2021 Non-residential: reduce carbon emissions by 40% on Part L 2021 Secure agreed % reduction against Part L Building Regulation in line with the energy hierarchy within P70 Energy of the Southwark Plan.
Biodiversity Net Gain (BNG) (if assessed as significant) and ecological management (P59-P61)	Minimum 10% Biodiversity Net Gain (BNG) on all development sites (with limited exceptions	Minimum 10% Biodiversity Net Gain (BNG) on all development sites (with limited exceptions)
Amenity space, play space and open space (P13-P15)	Southwark Plan 2022 policies P13-15 and P57 and London Plan 2021 policies D6, H16 and S4 set out the requirements	Southwark Plan 2022 policies P13-15 and P57 and London Plan 2021 policies D6, H16 and S4 set out the requirements
Social, community and other infrastructure (P17, P27, P45-P47)	Southwark Plan policies P17, P27 and P45-P47 and London Plan S1-S3, S5 and HC5 set out requirements	Southwark Plan policies P17, P27 and P45-P47 and London Plan S1-S3, S5 and HC5 set out requirements
Sustainable transport, public realm and highways (IP2, P13, P45, P50-P55, P65)	Transport obligations will consider location, connectivity, walking, cycling, public transport and highways impact	Transport obligations will consider location, connectivity, walking, cycling, public transport and highways impact
Business relocation strategy (P32-P33)	Developments that displace small or independent businesses	Developments that displace small or independent businesses

Table 6: Non-financial section 106 planning obligations

1.6 What is Community Infrastructure Levy (CIL)?

CIL is charged per square metre of floorspace. It is applied to new developments over 100 square metres Gross Internal Area (GIA)[2] and to development that creates a dwelling. CIL charges are based on the size and type of new development. Some development do not have to pay CIL, such as some types of affordable housing.

CIL allows local authorities in England and Wales to raise funds from developers undertaking new development. It can be used to fund a wide range of local and strategic infrastructure to support growth in the borough.

1.7 Southwark CIL

Southwark is a CIL charging authority. The council's CIL is set out in the adopted CIL charging schedule. This is based on the amount of CIL needed to support growth. The schedule shows how much each development must pay. It also includes a map of the CIL charging zones and where they apply.

Southwark Council increases the CIL rates annually through Building Cost Information Service (BCIS), as required by the CIL Regulations. This is published on the Southwark website in the Southwark Annual CIL Rate Summary.

The council's instalment policy follows the GLA instalment policy:
For schemes under £100,000, CIL is due in full within 60 days of commencement.

- For schemes over £100,000, the first CIL instalment is due within 60 days of commencement. The second instalment is due within 240 days of commencement.
- For schemes where CIL is not paid in full on time, this is due immediately by the developer.

Further information is on the council's CIL webpage.

1.8 Local CIL

The CIL regulations (amendment) 2014 require an amount of CIL to be spent locally. This is 15% with a cap at £100 per council tax dwelling. For areas with an adopted Neighbourhood Plan[1] the amount is 25% with no cap.

Southwark Council will spend 25% of CIL at a local level, whether there is an adopted Neighbourhood Plan[1] or not. It will be allocated in accordance with council policy.

1 As set out in the Neighbourhood Planning (General) Regulations 2012.

2 The Royal Institute of Chartered Surveyors (RICS) Code of Measuring Practice is used to define GIA. Existing floor area is measured inside the internal perimeter wall using scaled floor plans. If there are no scaled plans of the existing buildings, no discount for existing floorspace will apply.

1.9 Mayoral CIL

As well as Southwark CIL, the Mayor of London charges CIL (MCIL) to deliver London-wide infrastructure. Southwark Council collects Mayoral CIL on behalf of the Mayor. Further information can be found using this link.

1.10 How is CIL paid?

CIL is payable on commencement, which is the earliest date material operation[1] takes place on the site. For retrospective planning applications, commencement is the day that planning permission was granted.

Phased planning permissions are considered as separate chargeable developments. Each phase or stage must be set out in the planning permission with a clear CIL phasing plan.

Phasing must clearly relate to specific parts of construction or development, such as construction of a building. It cannot be used to artificially sub-divide development.

Phasing will only be appropriate for large-scale major development. It will not be appropriate to minor development.[1]

1.11 How is CIL spent?

Most Strategic CIL in Southwark is spent on new transport infrastructure. It also funds new schools, community infrastructure, health, biodiversity and parks. Projects funded by CIL and Section 106 planning obligations are set out in the council's annual Infrastructure Funding Statement.

Further information about Southwark Council's spending on CIL on projects: https://www.southwark.gov.uk/planning-and-building-control/section-106-and-community-infrastructure-levy/community-infrastructure-levy-cil?chapter=5.

The council decides on the expenditure of CIL on projects identified in its annual Infrastructure Funding Statement. The release of these funds is approved by Cabinet.

Local CIL can be used to fund both infrastructure and non-infrastructure projects, provided it is related to the demands that development places on the area.

1 This is defined at https://www.legislation.gov.uk/ukpga/1990/8/section/56/2013-04-16

2. FINANCIAL AND NON-FINANCIAL SECTION 106 PLANNING OBLIGATIONS

This section provides more detail on the type of financial and non-financial obligations which may be required as a result of development. It is not an exhaustive list. Each section sets out a relevant policy requirement in the Southwark Plan 2022 and what may be the corresponding contribution that may be required to mitigate the impact of development.

2.1 Social rented and intermediate homes

The Southwark Plan 2022 social rented and intermediate homes policies are P1, P3-P7 and P9. London Plan 2021 policies are H1, H2, H4, H5, H6, H7, H11, H12, H13, H15 and H16.

All housing developments, including conversions, must provide social rented and intermediate housing. This includes student accommodation, co-living and houses in multiple occupation. This should be provided on site, or off site where this is not possible.

In exceptional circumstances, a financial contribution will be required to fund new affordable housing in Southwark. The payment will equate to the maximum viable amount of affordable housing and should not result in any financial benefit to the applicant.

The formula for the expected Section 106 financial obligation is:

The total number of habitable rooms across the development (all tenures and types) × 0.35 (minimum 35% provision) × £ per habitable room in the CIL value area.[1]

Refer to Table 5 for the financial obligations based on Southwark's CIL Zones.

Affordable housing requirements are set out in Section 106 planning obligations. This will include:

- Trigger points for specific contributions (i.e when delivery of affordable housing must be delivered by);
- The number and type of affordable housing on site (affordable housing and tenure mix); and
- When any payment of an affordable housing financial contribution is due (if applicable).

Applicants are required to submit the Affordable Housing Monitoring Schedule and provide data to the council for its Annual Affordable Housing Audit. Information on the housing mix will be required for the different stages of the development.

1 A habitable room is defined as a room with a window within a dwelling that is intended to be used for sleeping, living, cooking or dining, regardless of what it is actually used for.

2.2 Wheelchair accessible homes

Southwark Plan 2022 policies P5 and P8 and London Plan policies D7 and E10 set out the policy requirements for wheelchair accessible homes.

All housing developments, including conversions, must provide wheelchair accessible homes. Sometimes this cannot be provided on the development site or off-site. A financial contribution may be required to build wheelchair accessible homes on another site in Southwark. The formula for the section 106 financial contribution is:

Number of habitable rooms required for the wheelchair accessible homes × £10,000.

The applicant is required to submit additional information in the Affordable Housing Monitoring Schedule. A wheelchair accessible homes parking plan and allocation strategy must be provided.

2.3 Affordable workspace

Southwark Plan 2022 policy P31 and London Plan 2021 policies E2 and E3 set out the policy requirements for affordable workspace.

Any new employment space over 500 sqm must provide a minimum of 10% affordable workspace for 30 years at a discounted cost. Where the council accepts that this cannot be provided on the development site or off-site, a financial contribution will be required to fund the provision of affordable workspace on another site in Southwark.

The formula for the payment is calculated using the council's Affordable Workspace Calculator.

The applicant will be required to submit an Affordable Workspace Strategy for approval by the council. An Annual Affordable Workspace Strategy Monitoring Report must be submitted on or immediately before 1 year of first occupation and each subsequent year for the whole term of the lease.

2.4 Business relocation

Southwark Plan 2022 policies P32 and P33 and London Plan 2021 Policies E2 and E8 set out the requirements for small shops and business relocation.

Business Relocation strategies must be submitted with applications for developments which may displace small or independent businesses. Guidance on how to prepare a Business Relocation Strategy is here.

This does not require the applicant to pay compensation. It is an obligation on the developer to use reasonable endeavours to help to successfully relocate small or independent businesses operating on the development site. A final version of the Business Relocation Strategy is required once planning permission is granted.

2.5 Jobs and training in construction

Southwark Plan 2022 policy P28 and London Plan 2021 policy E11 set out the requirements for access to employment and training in construction.

Development proposals for sites with 5,000sqm (GEA) of new or improved floorspace will be required to provide training, apprenticeships, and employment on-site. Where the council accepts that this is not possible on site, a financial contribution will be required instead, as per Table 7.

Type	On-site requirements	Financial Contributions
Short courses	For every 500 sqm (GEA), one Southwark resident trained on a short course.	**£200 per resident not trained against target**
Apprenticeships	For every 2,000sqm (GEA), one new apprenticeship.	**£2,000 per apprenticeship not delivered against target**
Jobs during construction	For every 500 sqm (GEA), one unemployed Southwark resident is employed for a minimum of 26 weeks.	**£5,500 per unemployed Southwark resident not employed against target**

Table 7: Requirements for training, apprenticeships and jobs

Modern Methods of Construction (MMC) are sometimes used instead of standard construction methods. This can reduce the employment opportunities for local people. In these cases, a financial contribution is required for any shortfall in the jobs and training policy requirement.

Before commencement, the applicant will be required to submit an Employment and Skills Methodology for approval by the council. A Construction Industry Employment and Training Report will be required before completion of the development.

2.6 Jobs in completed developments

Southwark Plan 2022 P28 and London Plan 2021 policy E11 set out the requirements for jobs in completed developments.

All development over 2,500sqm (GEA) of non-residential floorspace is required to provide employment for Southwark residents in the completed development. Table 8 shows the requirement.

Type of development	Number of jobs provided in completed developments which last a minimum 26 weeks for unemployed Southwark residents
Workspaces and businesses - Class E(c-g), B2 and B8	10% of the total estimated Full Time Employee (FTE) employment on site*
Retail – Class E(a and b)	20% of the total estimated FTE employment on site*
Hotel (C1)	20% of the total estimated FTE employment on site*

Table 8: Requirements for jobs in completed developments

* This should be estimated using the third edition HCA Employment Density Guide (2015), or an alternative measure approved by the council.

The required number of jobs should be in place within 18 months of the first occupation of the completed development. The jobs need to continue for a minimum of 26 weeks. The applicant will be required to submit an end-use Employment and Skills Plan.

Where the job requirements cannot be met fully on site, a financial contribution for the shortfall is required. This is calculated as:

Shortfall against required number of jobs in completed development for unemployed Southwark residents which last a minimum 26 weeks × £5,500.

The financial contributions set out under 2.5 and 2.6 will be applied towards employment, training and skills programmes for Southwark residents in line with the purpose for which the section 106 financial planning obligation has been made. These programmes will offer pathways to employment across a range of sectors, according to local needs.

2.7 Supporting the local economy

Southwark Plan 2022 policies P28, P30 and P31 and London Plan 2021 policies E2, E3 and E11 set out requirements for supporting the local economy by enabling access to employment and training, re-provision of office and business development and provision of affordable workspace.

Where jobs and training obligations are required, a technical fee will be required for the monitoring of the Employment and Skills Methodology and/or Affordable Workspace Strategy.

The fee is £3,710 per development.

2.8 Local procurement

Southwark Plan 2022 policy P28 and London Plan 2021 policy E11 set out the requirements for local procurement.

Development that creates more than 1,000sqm (gross) must prioritise local businesses for the procurement of goods and services.

Developers should use reasonable endeavours to procure from businesses and organisations based in Southwark either:

- 10% of the total value of the construction contracts or,
- 10% of the total number of construction contracts tendered in relation to the development.

2.9 Loss of employment floorspace

Southwark Plan 2022 policy P30 and London Plan 2021 policy E1 set out the requirements where there is a loss of employment floorspace in office and business development.

Development in the following categories are required to retain or increase the amount of employment floorspace[1]:

- Central Activities Zone (CAZ)
- Town centres
- Opportunity areas
- Development plots within site allocations.

Where a lack of demand for employment floorspace has been demonstrated by a 2-year marketing exercise, a financial contribution may be acceptable.

In addition, development that results in a loss of employment floorspace anywhere in the borough must provide a financial contribution.

The financial contribution is calculated as:

10% of the FTE jobs which should have been provided in the development × £5,500 per job

This is calculated using the most current HCA Employment Density Guide, or an agreed alternative measure.

Financial contributions from the loss of employment space will be used to support a range of employment and skills programmes for Southwark residents. These will offer pathways to employment across a range of sectors, according to local needs.

1 Employment floorspace means Class E(g), B2, B8 or Sui Generis employment generating uses.

2.10 Net zero carbon development

Southwark Plan 2022 policy P70 and London Plan policies GC6, SI2 and SI 3 set out the requirements for net zero carbon development.

Major residential development is required to reduce carbon emissions on site by 100% on Part L 2021 Building Regulations. Major non-residential development is required to reduce carbon emissions on site by 40% on Part L 2021 Building Regulations.

In exceptional circumstances, carbon emissions may be offset to net zero. The fee for offsetting carbon is calculated as:

Total carbon shortfall (Tonnes of CO_2) × Cost of Carbon (£95 per tonne) × 30 years (the assumed lifespan of the building).

All the carbon offset contributions collected go into the Green Buildings Fund. This is used to fund carbon offsetting projects.

The Section 106 planning obligation will secure the requirements of the Energy Statement. Applicants will also need to provide the GLA Energy Assessment spreadsheet.

The Section 106 planning obligation will set out when any financial contribution is due. The applicant will be required to submit a Pre-commencement energy pro-forma to track any changes to the energy performance of the development as a result of changes to the design. The applicant may also need to submit an updated Energy Statement.

Major referable and phased developments must submit an independent review of the development's energy efficiency and a Pre-Occupation Energy Pro-Forma.

Before occupation, design estimates for the London Plan's Be Seen energy performance indicators will need to be submitted[1]. Annual in-use energy performance will be required 1 year after occupation and for the following 4 years.

2.11 Connection to a District Heat Network (DHN)

Southwark Plan 2022 policy P70 and London Plan 2021 policies SI3, SI12 and SI13 set out the requirements for connection to a District Heating Network.

The feasibility of connection will be assessed on a case-by-case basis. Where it is feasible, the connection to, or future-proofing of a connection to a District Heating Network will be secured by a Section 106 planning obligation.

Refer to the Climate and Environment SPD for further guidance on futureproofing a connection to a District Heat Network.

1 Via the GLA online portal.

2.12 Air Quality

Southwark Plan 2022 policy P65 and London Plan 2021 SI1 set out the requirements for air quality.

Air Quality Neutral

Where an Air Quality Neutral assessment shows that the development does not meet one or both air quality benchmarks and cannot be mitigated onsite or offsite, an offsetting payment will be agreed. This is in line with the Air Quality Neutral London Planning Guidance.

The offsetting calculation is assessed individually for NOx emissions, PM 2.5 emissions, Transport NOx emissions and Transport PM 2.5 emissions.

The fee is will be calculated using the following formula:

Excess emissions above the benchmark (tonnes of carbon dioxide/annum) × the damage costs (£/tonne of carbon dioxide) over a 30-year period, with a 2% annual uplift[1].

This financial obligation is expected to be paid in full prior to the occupation of the development. Any offsetting contributions are used to support the delivery of initiatives set out in the council's adopted Air Quality Action Plan (2023-2027).

Air Quality Monitoring

A Construction Environmental Management Plan (CEMP) is secured by planning condition and must be submitted before commencement. It should show any air quality impacts during site clearance, demolition and construction.

Where the CEMP shows that construction phase air quality impacts will occur, a financial contribution will be required. This applies to development of 10 or more residential units, and/or 1,000+ square metres of commercial space.

Sites below this threshold may be exempt from the requirement where applicants can demonstrate that the impacts arising will not have a disproportionate impact on the surrounding area.

A contribution will be used to monitor compliance with the construction phase air quality provisions of the Construction Environmental Management Plan.The fees are:

£2,100 for development of 10-49 homes
£3,200 for major developments of 50 homes and above.

1 This is calculated in line with the Air Quality Neutral London Plan Guidance

Before demolition or the commencement of groundworks, the applicant must pay the construction phase air quality monitoring payment.

During the construction phase, the developer must comply with the approved air quality management provisions in the Construction Environmental Management Plan.

Before occupation, the developer must carry out the measures in the Air Quality Assessment and Mitigation Plan.

2.13 Tree management and replacement

Southwark Plan 2022 policies P60-61 and London Plan 2021 policies D8, G1, G5 and G7 set out the requirements for tree management and replacement.

Developments which have a major impact on existing trees, or which deliver significant new planting, will need a Section 106 planning obligation. It also ensures that trees and landscaping are planted and maintained in line with the planning approval.

In exceptional circumstances, a section 106 financial contribution will be acceptable to compensate for the loss of a tree and to fund a replacement tree. Where this applies, the Capital Asset Value for Amenity Trees (CAVAT) methodology, UBoC model for carbon sequestration parity or an agreed alternative approach, is used to calculate the financial sum. The Tree Replacement Contribution must be paid before commencement.

An arboriculture specialist technical fee will also apply. The fee ensures that appropriate measures are in place for the long-term health of existing and newly planted trees. It also ensures that landscaping plans are carried out in line with the approved plans. The fee is:

£275 for each tree which requires protection, management or maintenance.

A bond will be secured for major developments where a significant number of new trees are proposed. The sum will be determined on a case-by-case basis. It will include a fee, equal to the council's costs for providing trees off-site for each tree which is not planted.

A Tree Strategy will be required to be submitted and approved by the council before the commencement of development. This should include the planting, management and maintenance arrangements for the trees and may be required as a condition and/or obligation. A Final Tree Planting Plan will be required prior to occupation of the site.

2.14 Biodiversity Net Gain (BNG) and ecological management

Southwark Plan 2022 policies P59-61 and London Plan 2021 policies G5, G6 and G7 set out the requirements for green infrastructure, biodiversity and ecological management.

The Environment Act (2021) sets a mandatory requirement for a minimum of 10% Biodiversity Net Gain (BNG) to be provided on all development sites. There are limited exemptions. The requirements are set out in Government guidance.

All developments which have BNG on site or off site must submit a post-approval Biodiversity Gain Plan. This must be submitted to the council and approved before development can legally commence.

BNG which is provided as part of major development will usually meet the Government's definition of 'significant' biodiversity enhancements. Some minor schemes will also meet this definition. Criteria for assessing 'significant' BNG is set out in the Southwark's Climate and Environment SPD and in Government guidance.

A Section 106 planning obligation will be used to secure the proposed 'significant' BNG set out in a post-approval Biodiversity Gain Plan.

Applicants with 'significant' BNG must also ensure that arrangements are in place for the 'significant' BNG to be managed for 30 years, in line with a post-approval Habitat Management and Monitoring Plan. Both documents must be submitted to the council for approval before submitted before development can legally commence.

BNG enhancements which are considered to be 'significant' must be managed and monitored by the applicant for a 30 year period. Monitoring reports must be submitted to the council at agreed intervals over for a 30-year period. This is a legal requirement.

A monitoring fee will be charged to cover the council's cost of this monitoring over 30 years. This will be secured in the Section 106 agreement.

The fee will be calculated on a case-by-case basis depending on the scale and complexity of the site. The starting point will be £12,874.

Financial Section 106 planning obligations may also be required for any mitigation or management arrangements required to meet the ecological mitigation hierarchy[1].

1 Avoid, minimise, restore, offset..

2.15 Amenity space, play space and open space

Southwark Plan 2022 policies P13-15 and P57 and London Plan 2021 policies D6, H16 and S4 set out the council's requirements in respect of design and open space. These policies are relevant for amenity space, play space and open space.

Open spaces are an essential resource for residents and visitors and all development should ensure that there is sufficient amenity and play space in accordance with GLA guidance. Applicants should use the GLA population yield calculator when considering demand for new play space.

Where the council accepts that the policy requirements cannot be met fully onsite, a financial S106 planning obligation is required in order to ensure that the impact of development is mitigated. This is calculated as follows:

£325 × square metre of shortfall in amenity space, open space or play space

The Section 106 planning obligation will set out when any payment is due. Details of play space design, open space and amenity space management will be required before commencement and occupation. This will be determined on a case-by-case basis and may include:

- A Children's Play Space Strategy and Plan.
- Open Space Landscape Plan.
- Outdoor/Communal Amenity Space Management Plan.

2.16 Social, community, and other infrastructure

Southwark Plan 2022 policies P17, P27 and P45-P47 and London Plan 2021 policies S1, S2, S3, S5 and HC5 set out requirements for education places, healthy developments, leisure, arts and culture and community uses.

Development which creates a need for new or expanded social, community and other infrastructure will require the impact of the development to be mitigated. This could be a requirement for contributions towards either one or more of the following:

- Education facilities (early and adult learning, primary and secondary schools);
- Land for health centres and care facilities;
- Sport and leisure facilities;
- Libraries, youth facilities and meeting spaces;
- Arts, cultural and faith facilities;
- TV Reception, Telecoms and CCTV Infrastructure;
- Community safety initiatives;
- Contributions for loss of community use floorspace;
- Community access to use school facilities;
- Flood and surface water management;
- Management and maintenance arrangements;
- Tourism and visitor facilities and visitor management plans;
- Public conveniences;
- Access arrangements to publicly accessible space within tall buildings

The Section 106 planning obligation will secure the requirement for any plans and strategies that the applicant is required to submit at different stages of the development. This could include:

- Community Use Report;
- Public Access and Management Framework;
- Sports/Leisure Centre Specification Plan;
- Education Delivery Plan; and
- Public Art Strategy.

Where the council accepts that social and community infrastructure cannot be provided on site or only in part, a financial contribution is required. For education and health services, the need will be calculated using the GLA population yield calculator. The financial contribution will be calculated based on this demand. Other section 106 financial contributions, such as the loss of community floorspace, will be calculated on a case-by-case basis.

2.17 Sustainable transport, public realm and highways

Southwark Plan 2022 policies IP2, P13, P45, P50-55, P65 and London Plan 2021 policies SI1, T1, T2, T3, T4, T5, T6, T7, T9, D8 and S6 set out the requirements for sustainable transport, public realm and highways.

Development may be required to contribute towards site specific measures such as highway works, transport infrastructure and public realm on site to mitigate site-specific impacts of the additional travel demand they generate. This will be considered on a case-by-case basis.

Travel Plans may also be required for planning applications in order to demonstrate how impacts will be overcome.

There are separate agreements which may need to be secured under the Highways Act 1980. These are:

- Section 38 agreements: required where a development site contains new or amended public highway which will be adopted by the council.
- Section 278 agreements: required if a development will alter the public highway within or adjacent to the site.

These are agreed between the council (as the highway authority) and the developer.

A Highways' works bond equivalent to the estimated cost of the works (index linked) plus a 10% contingency will be required. The bond is released once the works have been completed and signed off by the Highways team.

A fee is required for the monitoring of the Travel Plan and Delivery and Servicing Management Plan.

The monitoring fee is £2,790 per required plan for applicable applications.

Some developments may require improvements to the public realm which are in addition to any section 38/278 requirements. Public realm is publicly accessible space which may be privately or publicly owned. It can include streets, squares, forecourts, footpaths and the spaces between buildings. Public realm section 106 planning obligations will be assessed by the council on a case-by-case basis.

Financial Section 106 contributions relating to transport and public realm are calculated by Transport for London.

<u>Old Kent Road Opportunity Area</u>
The exception is the Old Kent Road Opportunity Area (Phase 1, pre-Bakerloo line extension) where the following contributions apply in addition to any assessed as being necessary to the development proposed:

- Bus contributions: **£2,700 per residential home (indexed from 2019).**
- Cycle Hire membership: **£50 per residential home (indexed from 2019) / £25 per studio room/£50 per 100sqm of other uses.**

Other plans and strategies may be required depending on the impact of the development.

These could include:

- Landscape Strategy and Plan
- Public Realm Management and Maintenance Plan/Strategy
- Visitor Management Plan
- Cycle Parking Strategy
- Public Art Strategy
- Management and Maintenance Plan

2.18 Archaeology

Southwark Plan 2022 policy P23 and London Plan 2021 policy HC1 set out the archaeology requirements.

Some developments need technical advice on applications in Archaeological Priority Areas (APA). Where the council considers an archeology contribution is required, contributions required are set out in Table 9.

Size of development	Development within Tier 1 APAs	Development within Tier 2 APAs (Basic rate)
Under 100sqm	£4,360	£3,598
101 - 3,499sqm	£8,635	£7,196
3,500 - 9,999sqm	£11,549	£9,624
10,000sqm and above	£17,270	£14,391
An additional fee for finds of high significance	Applicant notifies the council. Additional contribution is calculated on a case-by-case basis.	Applicant notifies the council. Additional contribution is calculated on a case-by-case basis.

Table 9: Archaeology contribution

Before demolition or the commencement of groundworks, the applicant must pay the archaeology contribution. An Archaeological Assessment Report will also be required.

2.19 Conservation and restoration management

Southwark Plan 2022 policies P13-P17, P19- P21, P24 – P26 and London Plan 2021 policies HC1, HC2 and D4 set out the requirements for conservation and restoration management in terms of design and tall buildings.

Where the council considers that technical advice on conservation and restoration will be needed for complex major applications and significant listed buildings, the contribution required is:

£3,598 for developments under 100sqm, and £7,196 for developments of 101sqm and above.

Before commencement, the applicant submits a Conservation, Restoration and Management Plan with the specialist fee. This outlines the work that has happened to protect the heritage fabric.

It includes:

- A record of the building before, during and after building work.
- The method for maintenance, repair and minor alterations post completion.

2.20 Construction logistics and highways

Southwark Plan 2022 policy P50 and London Plan policies SI1 and T7 set out the requirements for construction logistics and highways.

Technical advice on construction, demolition and network management is needed for the preparation of environmental management plans for major and complex minor sites. This includes the submission of a Construction Logistics Plan and Construction and Environmental Management Plan before commencement.

A Highways Plan will also be required before commencement. There will be a separate charge for this service.

2.21 Administration, Compliance and Submission fees

The administration and compliance fees are required in addition to the monitoring fees outlined in this SPD. They are calculated based on the size of development.

The fee covers the cost of;

- Data entry and database maintenance;
- Issuing outstanding Section 106 planning obligation contribution demands;
- Section 106 planning obligation compliance;
- Following up unpaid invoices/outstanding contribution demands;
- Processing payments
- Gathering, recording and reporting the spend of Section 106 planning obligations;
- Preparing reports for releasing funding for Section 106 planning obligations;
- Reviewing and considering the discharge of conditions, for example Biodiversity Net Gain Plans[1].

Administration and compliance fees are in Table 10. The fees support monitoring the Southwark Plan[2] housing, employment, business and climate emergency policies. These are in addition to any technical fees which are set out the sections above.

	Minor development	Small-scale major development	Large-scale major development (lower range)	Large-scale major development (higher range)
Threshold	1-9 homes and/or 0-999sqm commercial floorspace	10-49 homes and/or 1,000-3,499sqm commercial floorspace	50-99 homes and/or 3,500-10,000sqm commercial floorspace	Over 100 homes and/or over 10,000sqm commercial floorspace
Fee per application	£1,000	£5,000	£15,000	£20,000
Affordable housing monitoring fee	£150 per affordable home	£150 per affordable home	£150 per affordable home	£150 per affordable home

Table 10: Administration, Compliance and Submission fees

1 In accordance with the Environment Act 2021

2 Southwark Plan policy IP3. The Southwark Plan 2022 Annex 4 is a monitoring framework which the council is required to report against annually in its Authority Monitoring Report.

Technical and non-technical submission fees for S106 planning obligations are in Table 11. The fees are based on charges which reflect the officer time spent on approving obligations with varying levels of complexity. These fees will be adjusted over time and S106 drafting will reflect this.

Technical obligation fee	£561.50 to make a planning decision or approval of a matter within a section 106 agreement which needs a planning decision or approval.
Non-technical obligation or notification fee	£116 to record notifications where no decision is needed, but where a fact needs to be noted and recorded. These will usually be milestones in the development, such as confirmation of implementation or that a specific action has occurred.
Non-compliance fee	Additional charge of £300 if a S106 clause has not been discharged and the S106 team have to notify the developer. This is in addition to the cost for discharging a planning obligation. Any follow up correspondence and enforcement action will be charged at £120 per hour plus disbursements and costs.

Table 11: Submission fees

A schedule of technical and non-technical obligations and the cost will be included in the S106 agreement. Examples of typical obligations are in Appendix 1.

Appendix 1

Examples of non-technical and technical obligations are set out below. This list is not exhaustive.

Non-technical obligation fees:

- Notification of application to the Land Registry
- Notification of scheme progress (e.g. demolition, implementation, substantial implementation, completion, completion of affordable housing).
- Notification of choice of registered provider.
- Submission of housing delivery monitoring table (parts 1, 2, 3 and 4)
- Straightforward obligations such as the details of a car club scheme.

Technical obligation fees:

Technical strategies and assessments including, but not limited to;

- Affordable workspace strategy
- Travel plan
- Bicycle strategy
- Public realm specification
- Highways specification
- Children's play space specification
- DEMP and CEMP
- Energy Pro-forma Discharge
- Section 38/278 Highways agreement
- Pedestrian/vehicular visibility splays
- Employment and skills methodology; employment and skills plan.
- Notification of completion of public realm and highways
- Management plans, including;
  - Estate management plan
  - Public realm management plan
  - Student housing management plan
  - Delivery and servicing management plan
  - Affordable workspace management plan
  - Community space management plan
  - Car parking management plan
  - Operational management plan
  - Move-in / move-out strategies for student housing, co-living.
- Viability reviews
- Gradient and Spot Level Plans
- Traffic Management Order / Parking Changes on adopted streets (including e-scooter / e-bike bays)

Obligations which require notification, but no council approval (no fee applies)

- An obligation which precludes the implementation of development permitted by a planning permission until some step required by the obligation has been undertaken Grampian conditions.
- Obligation requiring an activity to occur in perpetuity, or to reinforce the planning permission
- Compliance obligations (e.g. relating to construction of affordable or wheelchair housing, local procurement).
- Maintenance during the defects period.
- Retention of architects.
- Obligations relating to use (e.g. restrictions on use or public access)

The fees for approving obligations will be set out in the Section 106 agreement. The fees will be due when phases of the development such as implementation, construction above ground, completion take place. The fees will be due irrespective of whether an application for approval has been made.

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AFFORDABLE HOUSING

SUPPLEMENTARY PLANNING DOCUMENT (SPD)

JULY 2025

FOREWORD



The delivery of genuinely affordable housing, and social rent homes in particular, is an immensely pressing priority in Southwark, and one which underpins the Southwark Plan and our requirements from those who want to invest in our borough.

With over 17,500 households on our own waiting list, and with many others struggling to find affordable properties to rent or buy, it is imperative that the council and its partners work tirelessly to find solutions and remain committed to maximising affordable housing through development. I am delighted that Southwark is leading the way in London on social rent, with 550 completions, the most in any London borough in 2023-24. But we still have much more to do in order to meet demand and this SPD sets out more detail on how our Southwark Plan policies can be implemented, including in relation to small sites and student accommodation. The SPD also provides more detail on intermediate housing options including our aspiration in Southwark to deliver Keyworker Homes and Community Land Trusts.

Councillor Helen Dennis
Cabinet Member for New Homes and Sustainable Development
Southwark Council

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CHAPTER 1

INTRODUCTION

1. INTRODUCTION

This section provides an overview of the Affordable Housing Supplementary Planning Document. It sets out how this guidance should be used and who should be using it.

This SPD replaces the Affordable Housing SPD (2008) and draft Affordable Housing SPD (2011) and incorporates changes in national, regional and local policies. This SPD should be read alongside the council's Development Viability SPD (2016) and Draft Section 106 and CIL SPD (2024) (Subject to consultation).

1.1 Overview

The purpose of this Supplementary Planning Document (SPD) is to set out the council's approach to delivering affordable housing. This is a key objective of the Southwark Plan 2022, outlined in strategic policy SP1 'Homes for all'.

Southwark requires more affordable housing to meet the needs of all residents and to achieve the council's strategic policies. This was established in the Strategic Housing Market Assessment (SHMA) 2019. The SHMA demonstrated the local need for more affordable housing, both social rented and intermediate.

The purpose of this SPD is to:

- Support the implementation of Southwark Plan 2022 strategic policy SP1 'Homes for all'
- Provide clear definitions of what is considered affordable housing
- Set out the hierarchy for the delivery of affordable housing, including for small sites and non-conventional housing
- Set out the council's approach to assessing viability during the determination of planning application and in viability reviews
- Set out the standards for the housing mix and tenure of affordable housing
- Set out the expectations for the design and management of affordable housing
- Set out monitoring arrangements to retain affordable housing

1.2 What development does this SPD apply to?

This SPD applies to all housing development (including new build, change of use, conversions and extensions) with a policy requirement for affordable housing. It provides detailed guidance about how decisions on planning applications will be made.

This includes:

- Social rented housing (including council-owned housing)
- Intermediate housing
- Key worker housing
- Small sites development
- Self and custom build development
- Community Land Trusts (CLTs)
- Purpose built student accommodation
- Houses in Multiple occupation (HMOs)
- Wheelchair accessible housing

1.3 Policy context

This SPD provides guidance for applying the policies in the Southwark Plan 2022. It does not contain new policy. The SPD is a material consideration in the determination of a planning application.

The Southwark Plan 2022 together with the London Plan 2021 is the development plan for Southwark. The Southwark Plan 2022 is in conformity with the London Plan 2021 and the National Planning Policy Framework (NPPF) 2023.

1.3.1 National policy

National Planning Policy Framework (NPPF)

The National Planning Policy Framework (NPPF) requires local planning authorities to formulate planning policies to meet the needs of different groups in their local area, including people who need affordable housing. These policies should specify the type of affordable housing required.

1.3.2 Regional policy

The London Plan 2021

The London Plan 2021 provides the regional spatial development framework for London and outlines policy principles for affordable housing. This is set out in the planning policies and associated London Planning Guidance (LPG) and Supplementary Planning Guidance (SPG) documents.

The London Plan 2021 contains the following relevant policies:

- D6 Housing quality and standards
- D7 Accessible housing
- H4 Delivering affordable housing
- H5 Threshold approach to applications
- H6 Affordable housing tenure
- H7 Monitoring of affordable housing
- H8 Loss of existing housing and estate redevelopment
- H10 Housing size mix
- H11 Build to rent
- H13 Specialist older persons housing
- H15 Purpose-built student accommodation
- H16 Large-scale purpose-built shared living

Other relevant policy documents are:

- Affordable Housing and Viability SPG (2017)
- Affordable Housing LPG (draft 2023) & Development Viability LPG (draft 2023)
- Housing Design Standards LPG (2023)
- Housing SPG (2016)

1.3.3 Local policy

Southwark Plan 2022

The Southwark Plan 2022 contains multiple relevant policies, for which this SPD provides further guidance:

- SP1 Homes for all
- P1 Social rented and intermediate housing
- P2 New family homes
- P4 Private rented homes
- P5 Student homes
- P6 Purpose-built shared living
- P7 Housing for older people
- P8 Wheelchair accessible and adaptable housing
- P9 Houses in multiple occupation
- P15 Residential design

Other relevant policy documents are:

- 2015 Technical Update to the Residential Design Standards (2011)
- Development Viability SPD (2016)
- Section 106 and CIL SPD (2015, updated 2020)
- Draft Section 106 and CIL SPD (2024) (Subject to consultation)

Area Action Plans (AAPs)

- Draft Old Kent Road Area Action Plan (2020)

CHAPTER 2

AFFORDABLE HOUSING DEFINITIONS

2. AFFORDABLE HOUSING DEFINITIONS

This chapter explains what the council accepts as affordable housing. The framework is adopted as part of the Southwark Plan 2022, which has the strategic objective of providing new homes in the borough, more of which should be affordable. Further guidance is provided on policy P1 of the Southwark Plan 2022 'Social rented and intermediate housing'.

Under policy P1 two types of affordable housing are acceptable:

- **Social rented housing**
- **Intermediate affordable housing**

Full definitions are in sections 2.1 and 2.2.

Social rented and Intermediate affordable housing is made available from the council (which may also be known as 'council housing'), a registered provider or other affordable housing provider.

The London Plan 2021 sets the framework for household income thresholds for intermediate housing. These are based on average household incomes and average house prices across London and are updated annually. Households earning above these income thresholds are not eligible for affordable housing.

Table 1 outlines the affordable housing which the council considers to meet the genuine needs of our residents. Full definitions are in sections 2.1 and 2.2.

Table 1: Genuinely affordable housing

Social rent	**Accepted**
Shared ownership	**Accepted**
London Living Rent	**Accepted**
Key worker housing	**Accepted**
Community Land Trusts (CLTs)	**Accepted**
Discount market sale	**Accepted**
Discount Market rent (where equivalent to London Living Rent levels)	**Accepted**
Discount market rent (when exceeding London Living Rent Levels)	NOT accepted
London Affordable Rent	NOT accepted
Affordable rent	NOT accepted

2.1 Social rented housing

Social rented housing is typically most needed by households on lower incomes who cannot afford to pay market prices for suitable homes. Rents can be set at around 40%-50% of private sector rented homes.

To be considered social rented housing, it must:

- Fix rents for properties let at '**social rent**'. This is set by the Regulator of Social Housing's Rent Standard. This is set annually and is usually based on the national government's guideline rent formula and rent cap.
- Determine access to social housing on housing need; and
- Be provided in perpetuity (unless purchased through Right to Buy) to ensure that all homes remain permanently, solely and exclusively available to meet the identified social rented housing need.

Social rented housing can be made available to rent either from the council (which may also be known as 'council housing'), a registered provider or other affordable housing provider.

2.2 Intermediate affordable housing

Intermediate affordable housing plays an important role in filling the gap between the social and affordable rented sectors and the open market. Households below certain income thresholds may not necessarily be able to afford to buy or rent suitable and satisfactory housing in Southwark but may be eligible for intermediate affordable housing.

The council considers the following intermediate housing to meet the genuine needs of our residents:

London Living Rent

London Living Rent (LLR) is a type of 'genuinely affordable' housing which can be funded by the Mayor's Affordable Housing Programme. London Living Rent is designed to help people transition from renting to shared ownership.

LLR homes will be offered on tenancies of a minimum of three years. By offering a below-market rent, tenants are supported to save money and given the option to buy their home on a shared ownership basis during their tenancy. If the tenant has not taken up this option within 10 years then the registered provider would be expected to sell the home to another eligible purchaser on a shared ownership basis.

The GLA publishes benchmark London Living Rent levels for every neighbourhood in the capital, updated annually. These are based on a third of average local household incomes and adjusted for the number of bedrooms in each home. To ensure family-sized LLR homes are affordable, the rent for a 3-bedroom home will be set at no more than 10% above the 2-bedroom rent.

There is flexibility to allow for rents to be set below the GLA benchmark. Rent levels must not exceed the benchmark LLR at the time of each new tenancy.

Discount Market Rent (where equivalent to London Living Rent levels)

Discount market rent is only considered to be 'genuinely affordable' where the rent level is equivalent to London Living Rent. The discount is expected to be up to 30% so that rent levels do not exceed 70% of market rent levels.

Discount market rent differs from London Living Rent as it is not funded by the Mayor.

Shared ownership

This involves homes which are part-owned and part-rented. Buyers purchase an initial share of at least 25% and can 'staircase' to full ownership. This means they can buy more shares over time until they own the property outright. Rent is paid on the part-rented share and is subject to caps below the market level. Buying more shares will reduce the amount of monthly rent paid. Service charges may also apply if the home is part of a wider development with common areas or external shared space.

Households with incomes of no more than £90,000 are eligible to purchase a Shared Ownership home. The full eligibility criteria is set by the GLA, with the income threshold reviewed annually.

The council previously set its own income thresholds for Shared Ownership homes. This requirement was removed in January 2024 and the council now follows the GLA eligibility threshold, as set out above. This ensures there is sufficient flexibility to offer Shared Ownership to a range of incomes under this threshold.

Key Worker Housing (KWH)

This is rental housing which is only available to those employed in defined key worker occupations (as set out in fact box 1) and whose household income is within a specific bracket, set out below.

Key workers perform essential work and are critical to many important services in the borough and in London. Key workers need to live a reasonable distance to their place of employment to ensure these services run efficiently. Key worker housing (KWH) is aimed at those key workers whose household income levels mean that they are unable to afford housing on the private market and who do not qualify for social rented homes.

The housing must remain KWH in perpuity. However, the individual KWH tenancies will be short lets of 2-5 years. These lettings will be monitored and renewed on condition of the combined household's continuing eligibility. This will form part of the tenancy agreement. Marketing and Management Plans will be required as a condition of any planning permission. This will ensure provision for the regular and on-going review of KWH tenancies.

KWH should be provided at rent levels (including service charge) equivalent to those defined at the maximum benchmark for 'London Living Rent' (LLR). LLR is calculated for each London neighbourhood, reviewed and updated annually.

KWH tenancies are subject to the following eligibility criteria. These are:

- The whole household (which can be formed of two or more unrelated households or sharers) must not have a combined gross income exceeding £67,000; and must not have a combined income of less than £26,000. These income thresholds are in line with the current household income parameters set by the GLA for LLR. KWH thresholds will be amended in accordance with any changes to the LLR thresholds.
- The members of the household must be in one of the defined occupations – see fact box 1.
- Members of the household must not be an existing homeowner.

Fact box 1: Key worker occupations

The council's definition of key workers has been produced based on evidence of recruitment and retention issues in Southwark. It follows the GLA's definition of essential workers but has been tailored to reflect specific conditions in Southwark.

The following occupations will be considered key workers:

- Nurses, doctors, and other clinical staff employed by NHS
- Firefighters
- Teachers/teaching assistants (from non-fee charging schools)
- Social workers, educational psychologists and therapists delivering services for the council
- Police officers/Police Community Support officers (PCSO).

The council's definition of key workers was approved by Cabinet in March 2021 under the Intermediate Rent Policy.

Community Land Trusts

Community Land Trusts (CLTs) are non-profit organisations that own and develop land for the benefit of the community. CLTs encourage the involvement of community-led housing organisations who are looking to create permanently affordable housing to meet local housing needs. CLTs are community and placed based organisations, the formation of which is led by the local community and not the council. This means the delivery of CLT led housing will depend on a community group coming forward. CLT homes may also only form a small part of a scheme's intermediate housing provision and is not necessarily expected to come forward on a large scale.

Where a CLT proposes to deliver genuinely affordable homes, we will require that they remain affordable in perpetuity. All community-led development schemes must demonstrate how they will be managed and financially viable over the long-term. The schemes must also set out at application stage how the homes will benefit the local community and how these benefits can be retained in perpetuity. This must be included in planning documents when the schemes are submitted for planning permission.

Discount market sale

This is housing which is for sale at least 20% below open market equivalent. The discount should be sufficient to ensure the homes are affordable or accessible to those with household incomes within the GLA thresholds. This is currently set at households earning no more than £90,000.

Discount market sale homes are restricted to eligible households and should remain affordable in perpetuity.

2.3 Not accepted affordable housing

The council does not accept the following as genuinely affordable housing:

- London Affordable Rent (LAR)
- Affordable rent
- Discount market rent (where exceeding London Living Rent levels)

This is because the housing options are not seen as genuinely affordable to Southwark residents. The rent levels for Affordable Rent and Discount market rent (where exceeding London Living Rent levels) can be set at or above 80% of market levels.

This is underpinned by the evidence base which supported the adoption of the Southwark Plan 2022.

CHAPTER 3

SECURING AFFORDABLE HOUSING

3. SECURING AFFORDABLE HOUSING

The Southwark Plan 2022 policy P1 'Social rented and intermediate housing' sets out the council's approach to securing affordable housing contributions. This includes the thresholds for providing affordable housing as well as the contributions which are required. The amount of affordable housing required will be calculated by habitable rooms (see fact box 2).

There are different eligibility thresholds and requirements for providing affordable housing depending on the scale of development. This is split between developments creating 10 or more homes and developments creating 9 homes or fewer (inclusive). There are also different requirements for development located on public land, on Locally Significant Industrial Sites (LSIS) and in the Aylesbury Area Action Core.

The expectation is that affordable housing should be delivered onsite unless off-site provision or an appropriate financial contribution in lieu can be robustly justified. The agreed approach must also contribute to the objective of creating mixed and balanced communities. This is in accordance with the National Planning Policy Framework (NPPF) 2024 paragraph 64.

Applicants are required to submit a viability assessment with their planning application when providing affordable housing (unless following the fast-track route) to ensure that the maximum proportion of affordable housing is negotiated on each development. The council's approach to viability testing is set out in section 4 of this SPD.

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Fact box 2: Habitable rooms

A habitable room is defined as a room with a window within a dwelling that is intended to be used for sleeping, living or dining, regardless of what it is used for.

This definition is set out in the fact box under Southwark Plan 2022 policy P1 'Social rented and intermediate housing'. This excludes enclosed spaces such as bath or toilet facilities, corridors, landings, hallways, lobbies, utility rooms, and kitchens with an overall floor area of less than 11sqm.

Any floor area where the ceiling height is less than 1.5 metres will not count towards the habitable floorspace. Any room that is over 28 sqm will be counted as two habitable rooms, in line with the calculation set out in policy P1.

3.1 On-site delivery of affordable housing

The general presumption is that affordable housing should be provided on-site. This follows the council's hierarchy for the delivery of affordable housing.

The council will secure affordable housing in a legal agreement. This normally covers the following issues:

- The total amount of affordable homes to be provided (by number of affordable housing units and number of habitable rooms)
- The tenure split between social rented and intermediate homes.
- The location of the affordable homes within the development.
- The size of the affordable homes.
- Details of any affordable wheelchair units to be provided, including the amount, the tenure and the specific standards. Standards expected of wheelchair housing are set out in Policy P8 'Wheelchair accessible and adaptable housing'.
- The affordability thresholds that apply. Housing will have to be provided in compliance with the criteria outlined in section 2.
- That no more than 50% of the market units within the development can be occupied before the affordable housing units are completed and handed over to the registered provider.
- Local authority nomination rights.
- Details on any potential service charges, where necessary.

Additional information will be required based on what the council considers necessary to mitigate the impact of the development and make it acceptable in planning terms. This is in accordance with Regulation 122 Community Infrastructure Levy Regulations 2010 (as amended).

3.2 Off-site delivery of affordable housing

In some cases, affordable housing may be delivered off-site. This is only considered acceptable when the affordable housing cannot be delivered on-site, and an appropriate location has been identified near to the proposed development.

Applicants must robustly justify off-site affordable housing through an open book financial viability appraisal. This must provide justification for how the off-site approach contributes to the objective of creating mixed and balanced communities. This is in accordance with the NPPF (2024) paragraph 64. Any financial benefit to the applicant due to off-site delivery will not be permitted.

Any off-site delivery of affordable housing will be required in addition to any on-site affordable housing the site would have been required to deliver (i.e. it must result in a net gain of affordable housing units).

To be considered off-site affordable housing for the main development, applicants must have secured planning permission prior to any occupation of the market housing on the main development. No more than 50% of the market units within the main development can be occupied before the affordable housing units off-site are completed and handed over to the registered provider.

3.3 Payments in lieu of affordable housing

Developments creating 10 homes or more

In exceptional circumstances, developments creating 10 homes or more may provide a financial contribution in lieu of delivering affordable housing on or off-site. The circumstances will be assessed on a case-by-case basis as part of the determination process of the planning application. The contribution must be based on the estimated cost of providing the required amount of social and intermediate housing on-site.

This will only be accepted where the payment in lieu can be robustly justified over on-site or off-site provision. This approach must also contribute to the objective of creating mixed and balanced communities. This is in accordance with the NPPF (2024) paragraph 64.

The payment in lieu should not provide a financial benefit to the applicant. This should be demonstrated by a viability assessment which shows the value of the site with and without the affordable housing element being provided. Applicants will also need to set out why the delivery of affordable housing on-site or off-site was not possible.

The following formula sets out the starting point for calculating payment in lieu contributions.

Fact box 3: Formula for payment in lieu per habitable room for developments creating 10 homes or more

The formula for the payment in lieu per habitable room is:

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

The value for each CIL zone is set out in the S106 and CIL SPD (2024).

This is in accordance with Policy P1 of the Southwark Plan 2022 which requires developments creating 10 homes or more to provide 35% minimum contribution towards affordable housing.

The final payment will be determined through the viability assessment process.

Developments creating 9 homes or fewer

Developments creating 9 homes or fewer (inclusive) may provide a payment in lieu. The financial contribution may be provided without the need to follow the council's hierarchy for affordable housing delivery. This approach is set out in Policy P1 of the Southwark Plan 2022.

This means applicants do not need to demonstrate why the delivery of affordable housing was not possible on-site or off-site, as required for major developments. Any contribution due will be determined in accordance with a viability assessment, as set out in section 4.

3.4 Single tenure schemes

The council receives applications for developments that are predominantly affordable housing or 100% affordable housing. This helps to deliver a significant amount of new affordable homes. A tenure split between social rented and intermediate applies to affordable housing schemes as set out in Policy P1.

In cases where the required tenure split cannot be provided, the applicant must demonstrate the need for the scheme and the specific tenure mix. This would need to be demonstrated as part of a viability appraisal.

In these cases, the council would normally decide the appropriate tenure within the affordable housing by taking account of:

- The site location, and the existing levels of affordable housing on site and in the area
- The need to create a mix and choice of housing across the borough
- The proposed tenure and affordability
- The direct and indirect benefits to the wider community
- The objective of creating mixed and balanced communities.
- If a Community Land Trust, the demonstration of the wider benefits, not only the members of the CLT whom it serves.

Applicants are encouraged to engage with the council at an early stage in their preparation.

Table 2: Types of residential development which are liable for a financial contribution

Typology	Affordable housing contribution payable and method of calculation
Extension to the existing residential development that does not create any new unit(s)	**No requirement** to provide affordable housing under policy P1. No financial contribution.
Converting two or more homes to one home (de-conversions)	**No requirement** to provide affordable housing under policy P1. No financial contribution, this is to be treated as a deconversion.
Self-Build properties (unless the property is put on the market within three years of occupation)	**No financial contribution, unless** the property is put on the market for sale within 3 years of first occupation. The calculation of the affordable housing contribution, and a viability appraisal and a legal agreement will still be required.
Change of use from a House in Multiple Occupation (HMO) (Sui Generis or C4) to a single C3 dwelling.	**No requirement** to provide affordable housing under policy P1. No financial contribution, this is to be treated as a deconversion.
Extension to existing residential buildings to create additional new unit(s) (without conversion of the existing dwelling)	**Yes.** Calculate the affordable housing contribution on the basis of 35% of the habitable rooms of the entire development.
New build construction of new dwellings on vacant land. These include infills and new dwellings in rear gardens	**Yes.** Calculate the affordable housing contributions on the basis of 35% of the habitable rooms of the entire development.
Change of use and conversion to dwellings (including with extensions)	**Yes.** Calculate the affordable housing contributions on the basis of 35% of the habitable rooms of the entire development.
Conversion / subdivision of existing dwellings without extensions	**Yes.** Calculate the affordable housing contribution on the basis of 35% of the habitable rooms of the entire development.
Demolition and the re-provision of additional unit(s)	**Yes.** Calculate the affordable housing contribution on the basis of 35% of the habitable rooms of the entire development.

CHAPTER 4

VIABILITY ASSESSMENTS AND REVIEWS

4. VIABILITY ASSESSMENTS & REVIEWS

The Southwark Plan 2022 policy P1 'Social rented and intermediate housing' sets out the council's approach to viability. This is also set out in the GLA's Affordable Housing and Viability SPG (2017) and the council's Development Viability SPD (2016). The council will apply the same viability approach to developments that create 9 homes or fewer (inclusive) as it does to developments of 10 homes or more.

This includes the two viability routes: the fast-track route or the viability tested route. The approach varies where developments of 9 homes or fewer (inclusive) can provide a financial contribution instead of delivering on-site or off-site affordable housing.

Separate viability approaches apply to other types of residential such as self and custom builds and Community Land Trusts (CLTs).

Submitting an application

An application which is going through the viability tested route will not be accepted as valid unless a complete financial viability assessment (and its public executive summary) has been submitted.

Applicants must meet the cost of the council reviewing any financial viability appraisals or provide a solicitor's undertaking to pay for an application requiring a financial viability appraisal.

Where a registered provider is delivering or taking on the affordable housing, their details and confirmation of their involvement should be provided in the application if known at this stage. The registered provider's requirements are expected to have been designed into the scheme and early engagement is encouraged.

The council offers a formal pre-application advice process which applicants are encouraged to use. This allows applicants to discuss proposals with the council before submitting a planning application. This helps to make the planning process more efficient by allowing the identification and resolution of any potential issues before the application is submitted.

Applications which use the the fast-track and viability tested route must follow the same public consultation requirements as other planning applications submitted to the council. Further information on how the council consults on planning applications and the expectation for how developers carry out consultation is set out in the council's Statement of Community Involvement (SCI) and Development Consultation Charter (DCC).

4.1 Fast-track route

Policy P1 of the Southwark Plan 2022 sets out that developments may follow the fast-track approach where eligible. This is underpinned by the London Plan 2021 policy H5 'Threshold approach to applications'.

Where developments follow the fast-track route, they will not be subject to a viability assessment. Viability assessments may be required however if amendments are made following the grant of permission. Legal agreements will also be used where necessary to cover other matters relating to affordable housing.

There are different eligibility thresholds for the fast-track route depending on the scale of development.

To be eligible for the fast-track route, developments must:

- Provide 40% social rented and intermediate housing, with a policy compliant tenure mix, (a minimum of 25% social rented and a minimum of 10% intermediate housing) with no grant subsidy).
- If in Aylesbury Area Action core: provide 60% social rented and intermediate housing with a policy compliant tenure mix, with no grant subsidy.

The Policy P1 eligibility requirements are higher than the 35% minimum requirement in Policy H5 of the London Plan 2021. This is in accordance with point C.3 of policy H5 which allows boroughs to set additional policy requirements and obligations where relevant.

Policy H5 also sets out different requirements for development located on public land and, Locally Significant Industrial Sites (LSIS).

Schemes which are ineligible for the fast-track route must go through the viability tested route.

An Early-Stage review will be required for fast-track developments if an agreed level of construction progress has not been made. This would be triggered after two years of the permission being granted, or within a timeframe otherwise agreed. This is to ensure an applicant fully intends to build out the permission. Further guidance on review mechanisms is set out in section 4.5 of this SPD.

The GLA's Accelerating Housing Delivery Practice Note (2024) sets out guidance on the assessment of schemes which provide affordable housing as social rent only, or with a majority of social rent, at a lower level than the relevant threshold. These schemes may be

delivered without requiring full viability assessments or mid-late stage reviews. This should be discussed with the case officer during the determination of the planning application.

4.2 Viability tested route

Policy P1 sets out the requirement for viability assessments for developments not following the fast-track route. This applies to all developments not following the fast-track route, whether creating 9 homes or fewer (inclusive) or 10 homes or more. This is to ensure a maximum level of affordable housing is secured. A site-by-site assessment will be undertaken, taking account of individual circumstances of development viability.

Assessments should identify the maximum amount of affordable housing (or financial contribution in the case of developments of 9 homes or fewer) which can be delivered. Assessments must be prepared in line with the council's guidance. Not doing so will mean that applications will not be validated. This includes the requirement for assessments to be published for public scrutiny at the application stage.

The applicant is required to meet the cost of the council having the viability assessment reviewed. This includes any subsequent reviews, including if an application has been refused and is subject to an appeal. An application will be refused if the applicant fails to pay for the council's review as this means the viability information cannot be assessed.

A Section 106 agreement or unilateral undertaking will be required to ensure the affordable housing contribution (plus the administration fee) is paid to the council on implementation of the main development's residential units. Different triggers for payment may be agreed if found to be justified and supported by the council's viability analysis.

Viability review mechanisms will also be required to ensure that affordable housing delivery increases if the viability of a site improves over time. Further guidance on review mechanisms is in section 4.5.

For smaller developments of 1-2 residential units, the council may impose a reduced time limit on implementing planning permission. This can remove the need for subsequent viability reviews as the timeframe of development is shorter.

Publication of viability assessments

The council will make the full financial viability assessment and its Executive Summary available for public scrutiny on validation of the planning application.

4.3 Section 73 applications

An updated viability assessment may be required for applications submitted under Section 73 of the Town and Country Planning Act 1990.

For example, where:

- There has been an amendment to the number of residential units.
- The tenure mix has been varied and differs to the original planning permission
- There has been a change to the development which could reasonably affect the viability (including a change of use to residential that could alter the viability positions).
- There has been a change in circumstance which the council considers could affect the viability of the scheme.

A Deed of Variation may be required where changes to the planning obligations are needed to make the s73 application acceptable in planning terms.
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4.4. Self build and custom housebuilding

The terms ‘self-build’ and ‘custom housebuilding’ cover the various ways that individuals can build their own homes.

The Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) provides a legal definition of self-build and custom housebuilding. The Act does not distinguish between self-build and custom housebuilding. It states that both are where an individual, an association of individuals, or persons working with or for individuals, build or complete houses to be occupied as homes by those individuals. For the purposes of this SPD, the term self-build will be used.

Self-build homes will only be liable for a financial contribution towards affordable housing if the property is advertised for sale or sold within 3 years of first occupation. It will be payable at the point of sale of the home. A review mechanism will only be required if a policy compliant contribution is not secured at the planning stage.

To ensure the home meets the self-build definition, the council must be satisfied that:

- The application complies with the Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) and accompanying Government guidance.
- The initial owner of the home will be (or has been) the primary decision maker regarding the final design and layout. In some cases, individuals are involved in building or managing the construction of their home from the start to the end. In other cases, individuals may commission the home to be built but make some key design decisions.
- The applicant will be the occupant of the property for at least the following 3 years.

If the above criteria are not met, the council will not consider the development to be self-build for planning purposes. This means the development will be liable for a financial contribution, in line with policy P1 (see Fact box 4).

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Fact box 4: Formula for payment in lieu per habitable room for self-build

The formula for the payment in lieu per habitable room for self-build is:

Number of habitable rooms × 0.35 × £30,000

4.5 Viability review mechanisms

Review mechanisms allow the council to re-appraise the viability of a development to ensure that the maximum affordable housing contribution is secured. They allow for additional affordable housing contributions to be secured should the viability and value of a development improve. This is measured from the date of planning permission to specific stages of the development programme (depending on the type of review).

The council follows the GLA's guidance when conducting and imposing review mechanisms. This can be found in the Affordable Housing and Viability SPG (2017) and Affordable Housing LPG (draft 2023) & Development Viability LPG (draft 2023). Applicants should refer to this guidance for further detail on how and when viability review mechanisms are used.

Affordable housing contributions cannot be revised downwards by review mechanisms. This means the affordable housing contributions cannot decrease because of the review. The cost of reviews must be met by the applicant.

Review mechanisms may include one or more of the following:

- An early-stage review
- One or more mid-term reviews (for larger phased schemes; or where progress following an early-stage review has not been met).
- A late-stage review

Review mechanisms can encourage the build-out of schemes, as they can be triggered if an agreed level of construction progress is not made.

The council will use an early-stage reviews for major schemes, if sufficient progress has not been made in construction. This would be triggered after two years of the permission being granted, or within a timeframe otherwise agreed upon.

Last stage review mechanisms will be used on all schemes which do not meet the policy compliant sum using a set formula, depending on the deficit. Contributions determined under the Late-Stage Review will be capped at the equivalent of 50 per cent affordable housing provision. This is in line with the GLA's guidance set out above.

CHAPTER 5

NON-CONVENTIONAL HOUSING

5. NON-CONVENTIONAL HOUSING

5.1 Purpose-built student accommodation (PBSA)

All developments of purpose-built student accommodation (PBSA) must provide affordable housing or a financial contribution in lieu. This ensures the need for student accommodation is balanced against the need for affordable housing. This is set out in the Southwark Plan 2022 policy P5 'Student Homes' and conforms with the London Plan 2021 policy H15 'Purpose-built student accommodation'.

London Plan 2021 Policy H15 also states that PBSA must contribute to a mixed and inclusive community at the neighbourhood level. The extent to which this policy requirement has been addressed will be a consideration in the determination of PBSA schemes.

There are two routes for the provision of student housing in Southwark:

- **Nomination schemes**: These schemes have an agreement with a higher education institution.
- **Direct let schemes**: These schemes do not have a nomination agreement with a higher education institution.

Each route has its own requirement for the provision of affordable housing contributions. The contributions include the provision of affordable student rent. This is defined by the GLA as costing no more than 55% of the maximum Qualifying Maintenance Loan for a student living in London. The actual amount for the coming academic year is published in the GLA's Annual Monitoring Report.

In accordance with Policy P1 of the Southwark Plan 2022, there is a general presumption for the on-site provision of affordable housing. Further guidance on the provision of affordable housing within PBSA schemes is in section 3 of this SPD. This includes guidance on on-site and off-site provision of affordable housing and the formula for calculating any payment-in-lieu.

Guidance on the council's approach to viability testing PBSA can be found in Section 4.

5.2 Houses in Multiple Occupation (HMOs)

The Southwark Plan 2022 policy P9 'Houses in multiple occupation' acknowledges the role of Houses in Multiple Occupation (HMOs) in meeting the need of some residents and reducing the pressure on conventional housing stock.

There are two categories of HMOs under the Use Class Order:

- A small HMO is defined as a property that is occupied by between 3 and 6 unrelated individuals who share basic amenities such as a kitchen or bathroom.

- A large HMO is defined as a property that is occupied by more than 6 unrelated individuals that share basic amenities such as a kitchen or bathroom. A large HMO is classified as Sui Generis under the Use Class Order.

The council controls the development of HMOs to ensure they are spread out appropriately across the borough. There can be negative impacts arising from an overconcentration of HMOs in an area including increased noise, pressure of local community facilities or stress on waste management.

HMOs are not expected to deliver affordable housing on or off-site, but are liable for contributions towards affordable housing. This can be provided as a financial payment. HMOs must submit a viability assessment to justify the maximum viable approach has been taken (see section 4). This is in accordance with policy P9 and P1.

This requirement is for all categories of HMO (small and large). This includes new build HMOs and HMOs resulting from the change of use from either a non-residential or residential use.

5.3 Other forms of self and non-self-contained housing

Form	Relevant policy	Use class and triggers	Affordable housing requirements
Older people housing	P7	C2, C4 and Sui Generis	Affordable housing delivery will be required, preferably on site.
Co-living		Sui generis More than 100 units	Affordable housing delivery will be required
Build to Rent (PRS)	P4	C3; >100 homes <100 homes	In accordance with P1, development must provide Discount Market Rent at social rent equivalent.

CHAPTER 6

DESIGN AND MANAGEMENT OF AFFORDABLE HOUSING

6. DESIGN AND MANAGEMENT OF AFFORDABLE HOUSING

6.1 Registered Providers

Social and intermediate housing can be delivered by bodies known as Registered Providers (RPs). RPs are organisations which are registered with the Regulator of Social Housing. The Regulator manages the statutory register of social housing providers (the register) which lists private (non-profit and profit-making) providers and local authority providers. Most RPs are housing associations, but they can also be trusts, co-operatives and companies.

The council holds an approved list of RPs of social housing. The list of council approved RPs will be reviewed on a regular basis and the most up to date version will be available on our website. Other Affordable Housing Providers that are not on our list of RPs will need to be approved by the council in writing. RPs which want to be included on the list should contact the council.

The council will use legal agreements to ensure housing remains affordable in perpetuity (where relevant depending on the affordable housing). This is in line with the National Planning Policy Framework. Clauses in the legal agreements will also require the developer to confirm and notify the council who the RP is.

6.2 Service charges

Service charges are costs that are charged to leaseholders by property managers to cover the provision of services to a building. The charges may also be paid by tenants to a landlord, usually in addition to rent.

The charges can include, but are not limited to:

- General maintenance and repairs
- Insurance of the building
- Central heating for communal areas
- Lift servicing
- Lighting
- Cleaning of common areas.

The charges may also include the cost of managing the building by a property manager or agency.

It is important that service charges are kept affordable for residents, especially those in affordable housing. Residents often have little control over service charge increases and can find themselves no longer able to afford the costs over time. Service charges can increase over the lifespan of a development due to poor design, maintenance or building management. Excessive services being provided may also lead to increased or unaffordable charges.

Residents of affordable housing should be given the same access rights to amenities and facilities within the scheme as occupiers of market housing. There should be no additional charge other than service charges, where reasonable.

If the council considers that access to a facility would make service charges unaffordable for residents of affordable housing, the council may suggest that it is excluded from standard service charges, and residents given full optional rights of access at a fair and reasonable charge.

Design

Good design is paramount to keeping service charges affordable. High quality and sustainable materials will help to minimise the need for repairs and ongoing costs. Poorly designed developments can require more work and regular maintenance, impacting the affordability of the housing for its residents. Where affordable homes are provided in a development, applicants must demonstrate that a high quality of design will be delivered.

Management

Developers and Registered Providers must use reasonable endeavours to minimise any service charges in respect of the affordable homes. The service charges should not be more than the actual costs reasonably incurred with providing the service.

Applicants are encouraged to follow good practice guidance such as the GLA's Service Charge Charter. The GLA charter encourages transparency, ensuring residents are provided with the information they need to understand service charges.

The Charter also emphasises the need for affordability, good design and the ability for residents to challenge service charges where nescessary. Early engagement with Registered Providers is encouraged to ensure that their requirements can be factored into the design of the development.

Monitoring service charges

The council may seek to be notified of the service charge cost for any social rented homes within a development. This would start from the date of first occupation and continue annually.

Restrictions may also be placed on increasing service charges. This would require the service charge for social rented homes to be lower than either the service charge cap set or determined in accordance with the rent standard.

The council will take account of service charges when considering the viability of a development.

6.3 Tenure blind design

The council expects affordable housing to be designed tenure blind. This means there should be no difference between the appearance and design quality of the affordable housing and market housing.The affordable housing should share the same access arrangements as far as is practical.

Affordable and private tenants should have equal access to communal facilities such as shared amenity and parking areas.

6.4 Mortgagee in Possession Clause (MiPC)

The Mortgagee in Possession clause (MiPC) is a fundamental clause to a Registered Provider's (RP) ability to secure funding for Shared Ownership leases. The council will require it to be included in all bilateral agreements made or unilateral undertakings offered under section 106 Town and Country Planning Act 1990.

The clause becomes operative in circumstances where a RP defaults on loan payments or any other terms. A mortgagee (or other relevant funding party) takes control of the RP interest in the affordable housing units as assets against which their loan is secured.

The GLA have produced a standard MIP clause to promote a consistent approach across London and facilitate Registered Providers in leveraging sufficient finance to increase the delivery of affordable homes.

The GLA MIP clause provides for any circumstance where a Registered Provider defaults on loan payments or other terms. The clause allows the council or another RP to purchase the affordable housing units within a specified 3 month 'moratorium period' that is satisfactory to major bank lenders. This is set out in the S106 agreement and is a contractual arrangement.

If after three months the homes remain unsold, the mortgagee (usually a bank that has financed the Registered Provider) can sell the S106 housing and the requirements for it to be affordable contained in the S106 will no longer apply.

A robust financial case must be set out by the Registered Provider if it does not want the council to include the GLA's standard clause.

CHAPTER 7

MONITORING OF AFFORDABLE HOUSING

7. MONITORING OF AFFORDABLE HOUSING

Monitoring is essential to ensure that affordable homes are secured, delivered and retained in accordance with policy requirements and their legal agreements. Through monitoring, the council can take enforcement action against developers that are found to be in breach of their legal agreements.

The council also monitors and reviews the provision of affordable housing in the borough. This checks that affordable housing has remained affordable, and the correct provision has been delivered. This monitoring ensures that, where appropriate:

- Developers are delivering and allocating the correct number of homes and habitable rooms as affordable housing
- Homes are being rented at an appropriate affordable level
- Affordable family homes are being provided
- The tenure of homes are tracked. For example, homes that may no longer be in intermediate tenure e.g. where a Shared Ownership unit has staircased to become a private market unit.

The council uses legal agreements and an annual affordable housing audit as part of the monitoring process. Monitoring also happens at certain trigger points of the development process.

7.1 Legal agreements

Planning obligations under section 106 Town and Country Planning Act 1990 will secure all of the requirements set out in this SPD.

This includes (but is not limited to):

- Affordable housing required to be delivered on site
- Any financial contribution due
- Any information that is required by the council or GLA to monitor compliance
- Any relevant affordability and eligibility criteria for each affordable housing tenure

These agreements will also secure any necessary viability reviews to ensure the maximum viable amount of affordable housing is being secured.

7.2 Affordable Housing Monitoring Schedule (AHMS) and annual audit

The Affordable Housing Monitoring Schedule (AHMS) is a mandatory template which developers are required to complete. This will provide the necessary information for the council's audit. The template sets out a clear format for the return of the required information. The AHMS will be required as part of legal agreements where on-site affordable housing is proposed. The schedule requires all housing units within the development to be identified including wheelchair accessible homes.

Developers and/or Registered Providers are required to inform the council of newly acquired affordable homes and any changes to existing homes held within the borough as part of the annual audit.

The AHMS requires information about the affordable housing, which includes details of:

- Tenure
- Number of bedrooms
- Flat size
- Weekly rent
- Service charge

The council may also ask for any other information it deems necessary to assist with the monitoring of affordable housing.

The council undertakes an annual audit to ensure that the homes secured within legal agreements are delivered. This ensures that homes are being adequately rented at an affordable level and the council are aware of where these homes are within the borough.

The annual audit must be completed and submitted to the council by the 31st March. The audit data will be published on the council's website.

CHAPTER 8

GLOSSARY

8. GLOSSARY

Affordable housing: Housing designed to meet the needs of households whose incomes are not sufficient to allow them to access decent and appropriate housing in their borough. Affordable housing comprises social and intermediate housing.

Affordable Housing Providers: Bodies which own and manage affordable housing. These could include registered providers and specialist private affordable housing managers.

Build to rent: Purpose-built housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses, but should be on the same site and/or contiguous with the main development. Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control.

Co-living / purpose-built shared living developments: These are similar to student halls of residence but not restricted to students. Typically a collective living scheme will be a large block which provides a range of communal areas that fulfil different functions (such as libraries, kitchens, gyms, games rooms etc.) which are available to all residents. Residents typically rent a small en-suite bedroom. Unlike halls of residence, collective living is intended to be a primary residence

Community Land Trusts: nonprofit organisations that own and develop land for the benefit of the community, affordable in perpetuity

Cluster flat: Non-self-contained accommodation for temporary occupation by a specific user group such as students or nurses, where living and kitchen facilities are shared by a number of households.

Density: The amount of internal floor space of a building in relation to an area of land. For residential development, density is expressed as the number of units or habitable rooms per hectare.

Development: As defined by Section 55 of the Town and Country Planning Act 1990, development means carrying out building, engineering, mining or other operations in, on, over or under land, or changing the use of buildings or land.

Habitable room: A room within a dwelling, the main purpose of which is for sleeping, living or dining. It is any room with a window that could be used to sleep in, regardless of what it is actually used for. This excludes toilets, bathrooms, landings, halls and lobbies, and also excludes kitchens with an overall floor area of less than 11 square metres. Any floor area where the ceiling height is less than 1.5m will not count towards the habitable floorspace. Habitable rooms exceeding 28sqm will be counted as multiple habitable rooms, as set out in Southwark Plan policy P1.

Heads of Terms: A document setting out the particular items of a S106 agreement as agreed in principle between the council and developer. It is advisable for Heads of Terms to be agreed prior to committee or delegated officers making a "minded to approve" decision. Any subsequent reluctance on the developer's part to adhere to agreed heads of Terms may justify a refusal of permission.

HMO: House in multiple occupation. These are dwellings which are shared by three or more tenants who form two or more households and share a kitchen, bathroom or toilet.

Household: One person living alone or a group of people (who may or may not be related) living or staying temporarily at the same address with common housekeeping.

Intermediate Housing: Sub-market housing which is above target rents, but is substantially below open market levels

Key Worker Housing: Housing product that is based at London Living Rent (LLR) rent levels and household income levels, but, unlike LLR, this is a product in perpetuity, offering rolling short-lets tenancies to people by reason of their occupation. Its purpose is to support the retention of key workers in the borough and applies to those who work in health, education, police and the emergency services.

Live-work units: The flexible use of buildings and spaces to allow both functions within them.

London Living Rent: A type of intermediate housing that is considered 'genuinely affordable', aimed at middle-income households. It is defined in the London Plan.

Local Plan: A statutory plan produced by each local authority that integrates strategic and local planning responsibilities through policies and proposals for the development and use of land in their area.

London Plan: A strategic plan for the whole of London produced by the GLA. The main purpose of the London Plan is to ensure that all the individual plans produced by the London boroughs work together to meet the priorities that are agreed for the whole London region. The Local Development Framework cannot contain strategies or policies that are not in general conformity with the London Plan.

Major developments: Any residential or mixed-use development creating 10 or more dwellings, or if that is not known, where the site area is 0.5 hectares or more. For other types of development, a major development is one where the floorspace to be built is 1000 square metres or more, or the site area is 1 hectare or more.

Mixed-use: Development comprising one or more activities within the same building or site.

National Planning Policy Framework (NPPF): A policy document that sets out the government's planning policies for England and how these should be applied.

Non- self-contained accommodation / non-conventional accommodation: Residential accommodation where occupiers of different householders share living, kitchen or bathrooms facilities.

Older People's Housing: This refers to various types of specialised accommodation for older people, such nursing homes and extra-care housing. It also includes sheltered housing, consisting of self-contained individual apartments, almshouses and co-housing schemes.

Planning obligations (or section 106 (s106) agreements): These agreements confer planning obligations on persons with an interest in land in order to achieve the implementation of relevant planning policies as authorised by Section 106 of the Town and Country Planning Act 1990.

Registered providers (RPs): Housing providers that are registered with the Homes and Communities Agency. Most RPs are housing associations, but some RPs are trusts, co-operatives and companies.

Shared Ownership: A tenure that allows households who cannot afford to buy a home outright the opportunity to part buy and part rent a home. Residents buy a minimum share of 10% in their home, depending on what they can afford, and pay rent on the share that they don't buy. The bigger the share that is purchased, the less rent has to be paid on the remaining part of the property.

Southwark Plan: See "Local Plan"

Small sites: Sites below 0.25 hectares in size; or which proposes 9 (inclusive) or less residential units.

Social rented housing: Housing that is available to rent either from the council, a registered provider, or another affordable housing provider. Social rented housing is set at an affordable rent based on local incomes.

S106 agreements: See “Planning obligations”

Self-build and custom-build housing: Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing.

Staircasing: A system that allows residents in shared ownership housing to buy more shares on their property as they can afford them until eventually they own their home outright.

Studio flat: A no-bedroom residential unit which has a separate bathroom and kitchen but shared bedroom and living area.

Supplementary Planning Document (SPD): A document that expands upon and provides further guidance on how planning policies in the Southwark Plan should be applied. Once adopted, an SPD will become a material consideration when considering planning applications in Southwark and is regularly monitored and reviewed.

Sustainability Appraisal/ Strategic Environmental Assessment: A systematic and interactive process undertaken during the preparation of a plan or strategy, which identifies and reports on the extent to which the implementation of the plan or strategy would achieve environmental, economic and social objectives by which sustainable development can be defined, in order that the performance of the strategy and policies is improved.

Sustainable Development: At a high level, sustainable development means meeting the needs of the present without compromising the ability of future generations to meet their own needs. Within the planning system, sustainable development means achieving economic, social, and environmental objectives.

Unilateral undertakings: Instead of agreeing obligations through the standard process of negotiation and agreement between the council and developer. Developers may prepare the terms of a planning obligation on their own, without prior discussion with the council. These will then be submitted to the council. If the terms are acceptable the fact that the document has not been negotiated should not in itself be seen as a bar to the grant of permission. Where any unilateral undertaking does not meet the council’s objectives permission should be refused.

Southwark Council
southwark.gov.uk

Agenda Item 7.

Meeting Name:	Planning Committee (Major Applications) A
Date:	14 May 2025
Report title:	Development Management
Ward(s) or groups affected:	All
Classification:	Open
Reason for lateness (if applicable):	Not applicable
From:	Proper Constitutional Officer

RECOMMENDATIONS

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

2. That the decisions made on the planning applications be subject to the conditions and/or made for the reasons set out in the attached reports unless otherwise stated.

3. That where reasons for decisions or conditions are not included or not as included in the reports relating to an individual item, they be clearly specified.

BACKGROUND INFORMATION

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

KEY ISSUES FOR CONSIDERATION

5. In respect of the attached planning committee items members are asked, where appropriate:

    a. To determine those applications in respect of site(s) within the borough, subject where applicable, to the consent of the Secretary of State for Levelling Up, Housing and Communities and any directions made by the Mayor of London.

b. To give observations on applications in respect of which the council is not the planning authority in planning matters but which relate to site(s) within the borough, or where the site(s) is outside the borough but may affect the amenity of residents within the borough.

c. To receive for information any reports on the previous determination of applications, current activities on site, or other information relating to specific planning applications requested by members.

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

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

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

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

10. All legal/counsel fees and costs as well as awards of costs against the council are borne by the budget of the relevant department.

Community impact statement

11. Community impact considerations are contained within each item.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Assistant Chief Executive – Governance and Assurance

12. A resolution to grant planning permission shall mean that the director of planning and growth is authorised to grant planning permission. The resolution does not itself constitute the permission and only the formal document authorised by the committee and issued under the signature of the director of planning and growth shall constitute a planning permission. Any additional conditions required by the committee will be recorded in the minutes and the final planning permission issued will reflect the requirements of the planning committee.

13. A resolution to grant planning permission subject to legal agreement shall mean that the director of planning and growth is authorised to issue a planning permission subject to the applicant and any other necessary party entering into a written agreement in a form of words prepared by the assistant chief executive – governance and assurance, and which is satisfactory to the director of planning and growth. Developers meet the council's legal costs of such agreements. Such an agreement shall be entered into under section 106 of the Town and Country Planning Act 1990 or under another appropriate enactment as shall be determined by the assistant chief executive – governance and assurance. The planning permission will not be issued unless such an agreement is completed.

14. Section 70 of the Town and Country Planning Act 1990 as amended requires the council to have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations when dealing with applications for planning permission.

15. Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that where, in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise. The development plan is currently the Southwark Plan which was adopted by the council in February 2022. The Southwark Plan 2022 was adopted after the London Plan in 2021. For the purpose of decision-making, the policies of the London Plan 2021 should not be considered out of date simply because they were adopted before the Southwark Plan 2022. London Plan policies should be given weight according to the degree of consistency with the Southwark Plan 2022.

16. The National Planning Policy Framework (NPPF), as amended in July 2021, is a relevant material consideration and should be taken into account in any decision-making.

17. Section 143 of the Localism Act 2011 provides that local finance considerations (such as government grants and other financial assistance such as New Homes Bonus) and monies received through CIL (including the Mayoral CIL) are a material consideration to be taken into account in the determination of planning applications in England. However, the weight to be attached to such matters remains a matter for the decision-maker.

18. "Regulation 122 of the Community Infrastructure Levy regulations (CIL) 2010 as amended, provides that “a planning obligation may only constitute a reason for granting planning permission if the obligation is:

    a. necessary to make the development acceptable in planning terms;
    b. directly related to the development; and
    c. fairly and reasonably related to the scale and kind to the development.

A planning obligation may only constitute a reason for granting planning permission if it complies with the above statutory tests."

19. The obligation must also be such as a reasonable planning authority, duly appreciating its statutory duties can properly impose i.e. it must not be so unreasonable that no reasonable authority could have imposed it. Before resolving to grant planning permission subject to a legal agreement members should therefore satisfy themselves that the subject matter of the proposed agreement will meet these tests.

BACKGROUND DOCUMENTS

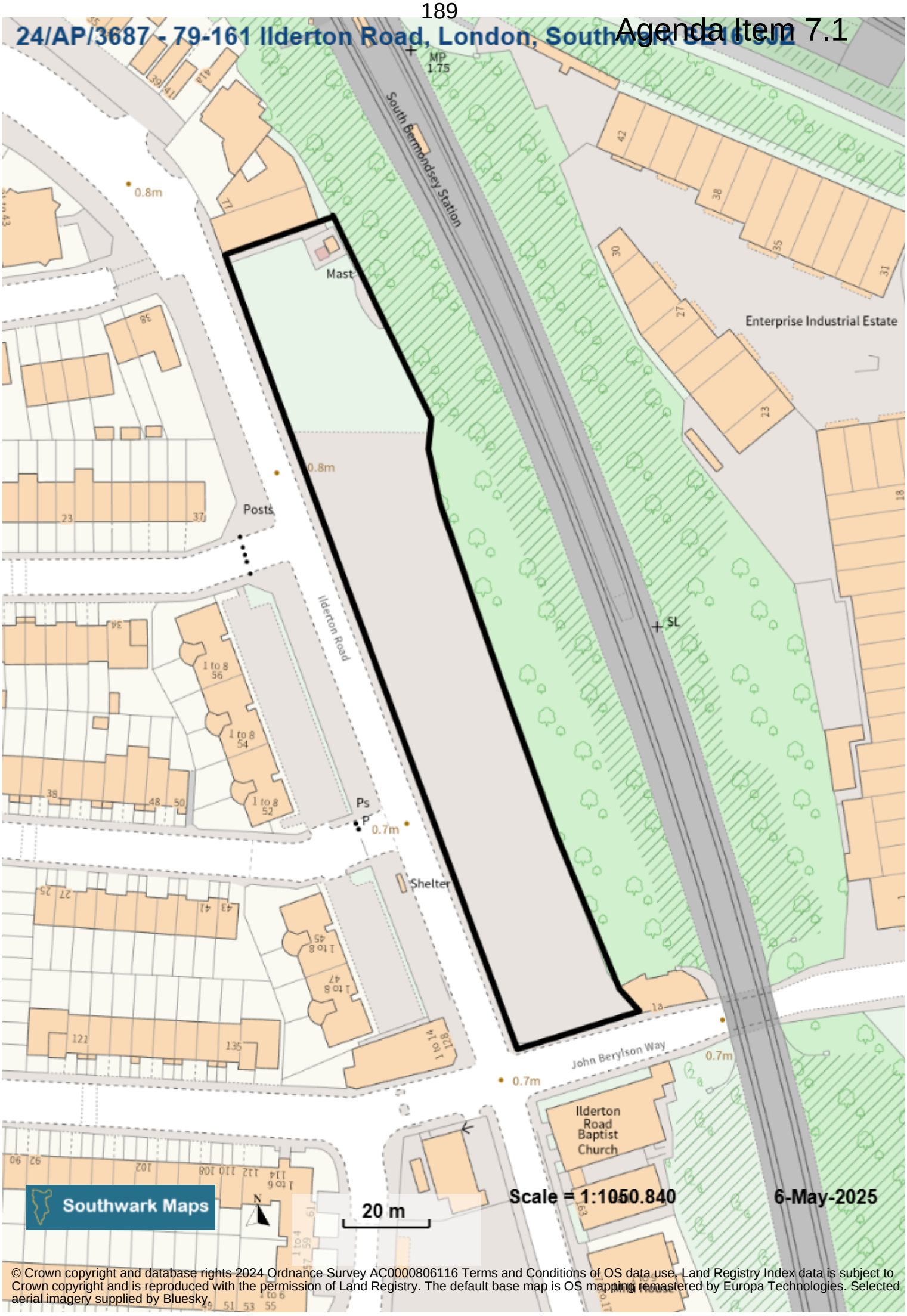
Background Papers	Held At	Contact
Council assembly agenda 23 May 2012	Constitutional Team 160 Tooley Street London SE1 2QH	Virginia Wynn-Jones 020 7525 7055
Each planning committee item has a separate planning case file	Development Management 160 Tooley Street London SE1 2QH	Planning Department 020 7525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

APPENDICES

No.	Title
None	

AUDIT TRAIL

Lead Officer	Chidilim Agada, Head of Constitutional Services	
Report Author	Alex Godinet, Lawyer, Finance and Governance Gregory Weaver, Constitutional Officer	
Version	Final	
Dated	6 May 2025	
Key Decision?	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	**Comments sought**	**Comments included**
Assistant Chief Executive – Governance and Assurance	Yes	Yes
Director of Planning and Growth	No	No
Cabinet Member	No	No
Date final report sent to Constitutional Team		6 May 2025



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Meeting Name:	Planning Committee (Major Applications) B
Date:	14 May 2025
Report title:	**Development Management planning application:** Application 24/AP/3687 for: Full Planning Permission **Address:** 79-161 Ilderton Road, London, SE16 3JZ **Proposal:** Redevelopment of the site to provide two separate buildings comprising large scale purpose built shared living (LSPBSL) units, conventional residential dwellings, flexible commercial floorspace, accessible parking, children's play space, public realm improvements, landscaping and other associated works.
Ward(s) or groups affected:	Old Kent Road
Classification:	Open
Reason for lateness (if applicable):	Not Applicable
From	Director of Planning and Growth
Application Start Date: 16.12.2024	**Application Expiry Date**: 17.03.2025
Earliest Decision Date: 31.01.2025	

RECOMMENDATION

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

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

EXECUTIVE SUMMARY

2. A key redevelopment site in the Old Kent Road Opportunity Area, 79-161 Ilderton Road comprises a long rectangular plot of vacant brownfield land flanked on one side by Ilderton Road and on the other by the elevated railway

line serving South Bermondsey Station. Although the nearest conservation areas and listed building are all more than 500 metres away, the former Baptist Chapel, which is on the Council's draft list of locally listed buildings, is within 25 metres. Nearby to the east is the Millwall Football Club, while further to the south along Ilderton Road are numerous sites where tall buildings have been consented in recent years, with many of these now under construction.

3. The potential of the site to make a major contribution to the Council's homes and jobs targets is reflected in the adopted site allocation (NSP70) and the draft site allocation (OKR16), both of which identify the site as appropriate for delivering a significant quantum of new homes, floorspace and industrial uses.

4. This application proposes the construction of two separate buildings either side of a central publicly-accessible Pocket Park. The first of these buildings, the North Building, would be formed of two blocks, one of 29 storeys and the other of 23 storeys, linked by a 2-storey plinth/base element. The other building, the South Building, would also be formed of two blocks: Block C would be 16 storeys and Block D would be 10 storeys, with the two linked by a single-storey plinth/base. In brief, the development would deliver:

    - 186 conventional (Class C3) affordable homes, all of which would be in social rent tenure;
    - a Purpose Built Co-Living premises (hereafter referred to as PBCL), also known as Purpose Built Shared Living, compromising 865 individual studios;
    - 396 square metres of flexible commercial space; and
    - a new 738 square metre publicly-accessible open space at the centre of the site.



Image 01 *(above): View of the proposal looking southwestwards from the junction of Rotherhithe New Road and Ilderton Road. Blocks A, B and C of the proposal can be seen in this view.*

5. The application site benefits from planning permission under 23/AP/0387, which is extant but has not yet been technically implemented, to deliver a residential led scheme comprising two buildings expressed as a sequence of four blocks stepping down from north to south. While the scheme proposed by 24/AP/3687 would comprise a larger number of homes and additional height, the disposition of the four blocks would be broadly similar. The building envelope established by 23/AP/0387 is a material consideration in the determination of this new planning application

6. The proposal would deliver an exemplary PBCL premises alongside 186 high quality social rent dwellings, the latter including a proportion of larger family units. Benefiting from well-proportioned and logically configured internal accommodation, a predominance of dual aspect, acceptable levels of natural light, and access to external amenity spaces, the homes would achieve a high quality of residential design. These new dwellings would contribute towards local affordable housing and the Council's housing targets, thereby bringing tangible benefits for the local community. The housing offer is considered to be a substantial benefit of the application.

7. 396 square metres of employment-generating floorspace is proposed, arranged as three separate commercial units, each providing an active frontage and contributing positively to the local streetscene. The applicant has agreed to initially market one of the proposed commercial units to supermarket operators only. The Pocket Park will provide further community integration and health benefits.

8. The application site is situated in a location where tall buildings are considered appropriate, subject to demonstration that they would achieve an exemplary standard of design and meet the requirements of the London Plan and Southwark Plan in all other regards. Forming an interesting composition and possessing a strong urban character, and with robust and high quality materials specified throughout, the proposed buildings would achieve an exemplary standard of architectural design. They would be set within high quality public realm, including a generously proportioned new park, numerous new trees, soft landscaping and play facilities. The on-site landscape offer would be complemented by financial contributions towards off-site investment in public open space elsewhere in the Opportunity Area.

9. With regard to amenity and environmental considerations, although the proposal would result in daylight and sunlight impacts at nearby existing properties that depart from the BRE guidelines, the retained levels are still considered adequate for a dense urban area and not considerably different to the impacts caused by the extant scheme. Flood risk, sustainable urban drainage, land contamination and wind microclimate matters have all been adequately assessed, with appropriate mitigation proposed.

10. Although the long-stay cycle storage facilities serving the PBCL would fall short of the minimum policy requirements, mitigation and monitoring commitments have been secured such that, on balance, refusal of planning permission would not be warranted. All other transport and highways matters

have been resolved satisfactorily, with mitigation secured through a range of planning conditions and obligations.



***Image 02** (above): Visualisation looking northeast across Ilderton Road, with the Pocket Park visible in the centre of the image, Blocks A and B in the background, and Block C in the foreground.*

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

PLANNING SUMMARY TABLES

12.

Conventional housing								
Homes	**Private Homes**	**Private HR**	**Aff.SR Homes**	**Aff.SR HR**	**Aff.Int Homes**	**Aff.Int HR**	**Homes Total**	**HR Total**
Studio	N/A	N/A	0	0	N/A	N/A	0	0
1 bed	N/A	N/A	77	164	N/A	N/A	77	164
2 bed	N/A	N/A	79	263	N/A	N/A	79	263
3 bed	N/A	N/A	30	150	N/A	N/A	30	150
4 bed +	N/A	N/A	0	0	N/A	N/A	0	0
Total	N/A	N/A	186	577	N/A	N/A	186	577

13.

Commercial

Use class and description	Existing GIA	Proposed GIA	Change +/-
E [a] to (f) (Retail/services/dining)	0	396#	+396
E [g] *i)* (Office)	0		
E [g] *ii)* and *iii)* (Light industrial)	0		
B2 (Industrial)	0	0	0
B8 (Storage/distribution)	0	0	0
E (Affordable workspace)	0	0	0
C1 (Hotel)	0	0	0
Sui Generis	0	33,473*	+33,473
Employment	**Existing no.**	**Proposed no.**	**Change +/-**
Operational jobs (FTE)	5	31** (max)	+26 (max)

Notes:

For a 101 square metre portion of this GIA, permission is sought for Class F2 use in addition to the flexible Class E[a-g] use.

* *This is the 865-unit PBCL premises; it should be noted, however, that the PBCL principally serves a residential rather than commercial function.*

** *This is based on applying the use class that has the highest employment density (retail, where 1 job is created by every 15-20 square metres of floorspace), generating a range of 20-26 FTE positions, and adding to this the 5 FTE positions connected to the PBCL.*

14.

Parks and child play space			
	Existing area	**Proposed area**	**Change +/-**
Public Open Space	0	738 sq.m#	+738 sq.m
Play Space	0	1,248 sq.m*	+1,248 sq.m

Notes:

This comprises 714 square metres of open-to-the-sky space, with 24 square metres beneath a cantilever.

* *This comprises the 738 square metre Pocket Park, added to the 510 square metres of dedicated playspace provided across the podium and two roof gardens within the South Building.*

15.

Carbon Savings and Trees			
Criterion	**Details**		
CO2 Savings	55% improvement on Part L of Building Regs 2021		
Trees Lost	0 x Category A	0 x Category B	0 x Category C
Trees Gained	39		

16.

Greening, Drainage and Sustainable Transport Infrastructure			
Criterion	**Existing**	**Proposed**	**Change +/-**
Urban Greening Factor	N/A	0.40	N/A
Greenfield Run Off Rate	7.66 l/s	5.00 l/s*	-2.66 l/s
Green/Brown Roof Coverage	0	368 sq.m	+368 sq.m
Electric Vehicle Charging Points	0	3	+3
Blue Badge Car Parking Spaces	0	6	+6
Cycle Parking Spaces	0	854	+854

17.

CIL and Section 106 (or Unilateral Undertaking)	
Criterion	**Total Contribution**
CIL (estimated)	£9,862,362.83 (pre-relief)
MCIL (estimated)	£2,403,789.80 (pre-relief)
Section 106 Contribution	£2,370,885.76 (a break-down of which can be found in the 'Planning obligations' section of this report)

BACKGROUND INFORMATION

Site details

Location and description

18. The application site has an area of 0.598 hectares and is of a long rectangular shape. It is bounded:

- immediately to the east by the elevated railway line serving South Bermondsey Station, beyond which is the Millwall Football Club along with some commercial workshop units, all of which are within the London Borough of Lewisham;
- immediately to the south by John Berylson Way, on the opposite side of which is the Christ Apostolic Church with the buildings further south comprising a range of uses including light industry, manufacturing and the Ilderton Road Primary School;
- immediately to the west by Ilderton Road, on the opposite side of which are the low-rise residential buildings of the Bramcote Estate; and
- Immediately to the north by a tyre dealer and workshop ('Mehmet's Tyre Shop'), beyond which further to the north is the Ilderton Road Travellers' Site.

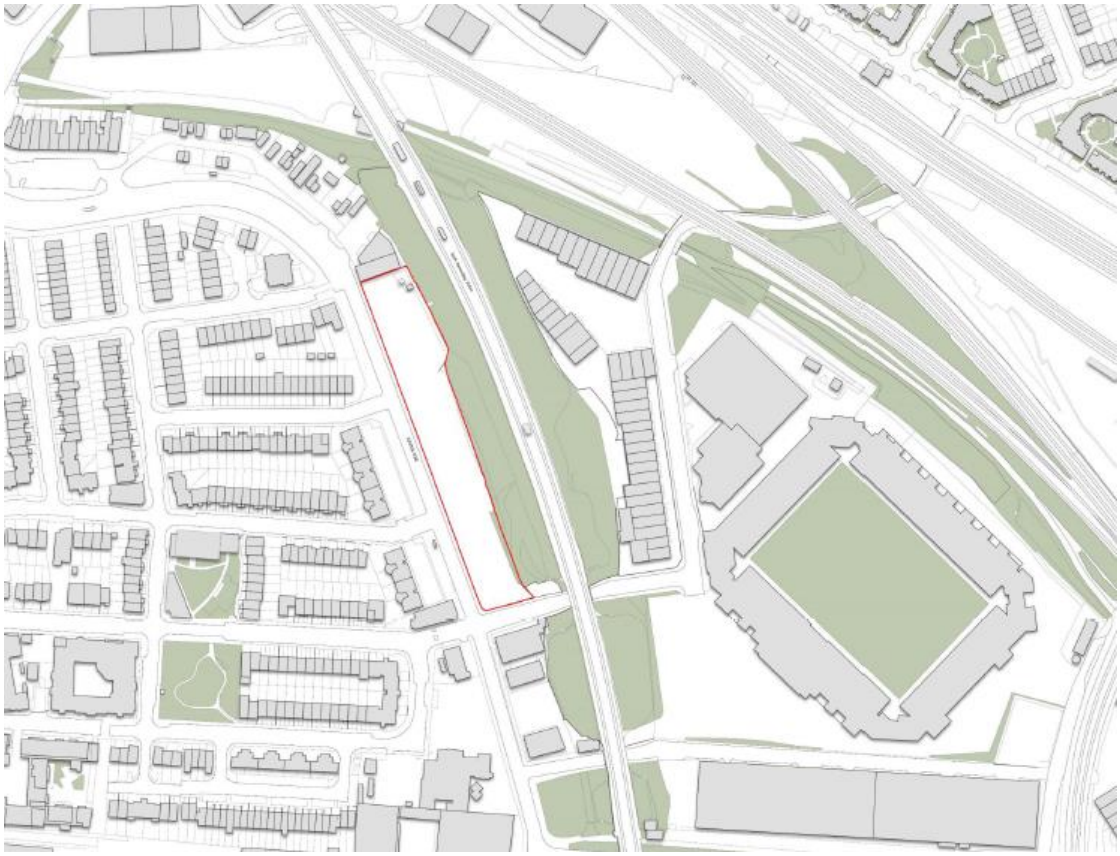


Image 03 *(above): Location plan, showing the site edged in red.*

19. The lawful use of the site is Sui Generis. Although currently vacant, the site was previously occupied by RS Joyner and Son who used the open yard space to store and sell second hand lorries and vans. The site contains no buildings or structures, and the land is a mix of hardstanding and vegetation. The highway-fronting perimeters of the site are secured by palisade fencing. One vehicular access point to the site exists via a dropped kerb, close to the junction of Ilderton Road and Ablett Street.



Image 04 *(above): Photograph of the existing site, taken from Ilderton Road and looking in a southeast direction. The railway line and embankment can be seen in the background.*

20. The applicant is Tide Construction Limited. Tide is a developer, contractor and off-site manufacturer who build all their developments using volumetric construction, employing their accredited off-site Vision Volumetric system.

Surroundings

21. Although of a predominantly residential and industrial character, the local area also contains commercial, educational, cultural and leisure uses as well as some places of worship.

22. The immediate surroundings currently comprise low-to-medium rise residential development and low-rise light industrial buildings. However, a short distance to the south around the Hatcham Industrial Estate and towards the southern half of Ilderton Road there are a number of much taller mixed-use buildings either under construction or recently completed. These are reflective of the intensification and densification the wider Opportunity Area is undergoing.



Image 05 *(above): Aerial image of the site (edged in red), looking northwards, with key nearby transport infrastructure and redevelopment sites highlighted.*

23. The land to the east is occupied by the Millwall Football Club, which is known as 'The Den', together with a small number of low rise commercial units. The land benefits from extant planning consent for a major mixed-use redevelopment (Lewisham Council reference number: DC/20/119706) including a series of towers of varying heights, with the tallest being 38 storeys, known as the "New Bermondsey Masterplan". The hybrid permission for this masterplan development obtained a resolution to grant in January 2021.

Designations

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

- Site Allocation NSP70 (Hatcham Road, Penarth Street and Ilderton Road) in the Southwark Plan 2022;
- Old Kent Road Area Vision AV13;
- Old Kent Road Opportunity Area;
- Old Kent Road Strategic Cultural Area;
- Old Kent Road Action Area Core (the majority of the site, except the portion within the Urban Density Zone);
- the Urban Density Zone (a small portion at the northern end of the site only);
- Hot Food Takeaway Primary School Exclusion Zone;
- Hot Food Takeaway Secondary School Exclusion Zone;
- Flood Zone 3 (in an area benefitting from flood defences);
- the Air Quality Management Area;
- “East Central” Multi-Ward Forum Area; and
- Community Infrastructure Levy Charging Zone 2.

25. The application site sits within the Core Area of the draft Old Kent Road AAP 2024 (hereafter referred to as the draft OKR APP). More specifically it sits within Sub-Area 4, ‘Hatcham, Ilderton and Old Kent Road (South)’. Within this Sub-Area, the application site forms part of the OKR 16 parcel, ‘Hatcham Road and Ilderton Road’, which covers 7.9 hectares of land and has an indicative capacity of 2,200 new homes and 2,698 additional jobs. While the majority of the OKR 16 parcel is designated as a Locally Significant Industrial area or as Strategic Protected Industrial Land within the draft OKR AAP and/or the Southwark Plan, the application site does not fall under either of these designations. The site is also located within the area covered by the Hatcham and Ilderton Design Code.

26. With regard to heritage designations, the site does not include any listed structures and is not in a conservation area. Christ Apostolic Church, which is located to the south of the site on the corner of John Berylson Way and Ilderton Road, is designated as a building of architectural and historic interest in the draft OKR AAP. It is also on Southwark’s Register of Locally Listed Buildings.

27. Other nearby sites that are also on the Register of Locally Listed Buildings are:

- a terrace of late nineteenth- and early twentieth-century dwellings at 209-225 Ilderton Road;
- the Penarth Centre; and
- a former public house 58 Bramcote Grove, on the corner with Barkworth Grove.

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

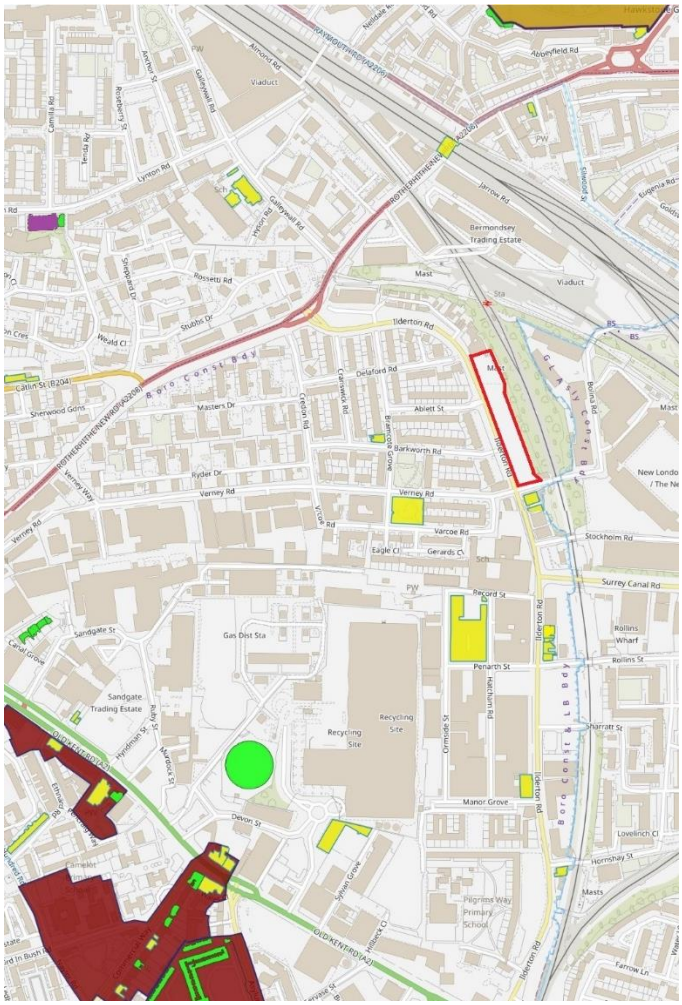


Image 06 *(left): Map showing the site in the context of heritage designations.*

Image 07 *(below): Photo of the Christ Apostolic Church.*



29. With respect to strategic and borough views, the site is not within any of the Borough or London View Management Framework (including the wider corridor settings and the background regions) views. The site does fall within the extended cone of the background wider setting consultation area of LVMF Townscape View 23A.1, from the bridge over the Serpentine to Westminster. The site sits approximately 1.6 kilometre beyond the 23A.1 Wider Setting Consultation Area of this view.

30. There is no existing public space nor any trees within the application site. The nearest public green spaces are (in order of proximity):

- Pat Hickson Park located 100 metres (a 2 minute walk) to the south of the site, at the junction of Ilderton Road and Stockholm Road;
- Bramcote Park located 150 metres (a 3 minute walk) to the west of the site;
- Bridgehouse Meadows located 350 metres (a 7 minute walk) to the southeast of the site; and
- The 63 acre Southwark Park located approximately 500 metres (a 10 minute walk) to the north of the site.

31. Immediately to the east of the site is the South Bermondsey Railway Embankments Site of Importance for Nature Conservation (SINC).

32. With respect to transport connectivity, South Bermondsey Overground is the nearest railway station, located approximately 100 metres to the north. It offers connections towards London Bridge, West Croydon and Beckenham Junction. The nearest underground station is Canada Water, approximately 700 metres to the northeast. As part of the New Bermondsey masterplan a station is proposed on the Overground Windrush line, in-between Surrey Quays and Queens Road Peckham stations; the entrance to the new station would be on Surrey Quays Road approximately 300 metres southeast of the 79-161 Ilderton Road site.

33. The P12 bus provides a regular service along Ilderton Road, connecting to Camberwell and Surrey Quays. There also four different bus routes available from nearby Rotherhithe New Road / Galleywall Road, which provide connections to central London and Peckham. The pedestrian routes around the application site provide easy access to the bus stops and train stations.

34. With regard to local cycling infrastructure, National Cycle Route 425 runs east to west from Burgess Park to Rotherhithe. This route travels along a section of Ilderton Road and passes to the southwest of the site. Cycle Superhighway, which connects Tower Bridge with Greenwich via Rotherhithe, is approximately 850 metres northeast of the 79-161 Ilderton Road site.

35. The current PTAL rating of the site lies between 1b and 3, which indicates a poor-to-average accessibility to public transport. However, this rating is predicted to rise to PTAL 4, indicating good public transport accessibility, once the planned transport network upgrades for the area have been completed.

36. The nearest short-stay cycle storage facilities are at the Ilderton Road shopping parade approximately 200 metres to the northwest of the site. These facilities comprise a bank of twelve Sheffield stands (24 spaces) and a bank of seventeen Santander Cycle docks.

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

    - five Blue Badge parking spaces nearby (these are all within Bramcote Estate, at distances of between 125 metres and 175 metres from the site);
    - opportunities for ad hoc on-street parking within Bramcote Estate;
    - four Car Clubs, as follows:
        - Zipcar on Verney Road, 500 metres away (a 10 minute walk);
        - Zipcar on Lynton Road, 500 metres away (a 10 minute walk);
        - Zipcar Club on Raymouth Road, 600 metres away (a 12 minute walk); and
    - one loading bay (accommodating up to four small vehicles) on Penarth Street, approximately 400 metres southwest of the site.

38. The two roads adjacent to the site, Ilderton Road and John Berylson Way, are adopted highways. Both of these highways are also subject to a Local Development Order (LDO), approved by Southwark Cabinet on 13 June 2023. The LDO permits the construction of an underground network of 7 kilometres of insulated pipes to carry heat from the South-East London Combined Heat and Power (SELCHP) facility in South Bermondsey to properties around Old Kent Road and Peckham for the purposes of supplying heating and hot water. Construction of the district heat network commenced in 2024, with Phase 1 between SELCHP and the Brimmington Estate boiler house scheduled to complete by autumn 2025.

39. The site falls outside the safeguarded area of the potential future Bakerloo Line
Extension promoted by Transport for London.

Details of proposal

40. This application seeks full planning permission for the redevelopment of the site to provide two separate buildings (the 'North Building' and the 'South Building'), each with a single-storey basement. The two buildings would be separated by a central publicly-accessible open space. Each building would be expressed as two blocks linked by a plinth/base; as an architectural composition, this would create series of four blocks, decreasing in height from north to south.



***Image 08** (above): East elevation of the proposed development (i.e. looking from Ilderton Road), with Blocks A to D (left to right) interspersed by the Pocket Park.*

The North Building

41. The North Building would comprise two blocks, Blocks A and B, rising from a two-storey plinth/base. Block A would be 29 storeys in height plus additional rooftop plant (95.02 metres above ground level, 95.97 metres above

Ordnance Datum). Block B would be 23 storeys in height plus additional rooftop plant (77.47 metres above ground level, 78.42 metres above Ordnance Datum). A single-storey basement would span full footprint of the building.

42. With the exception of a small portion of the ground floor, the North Building would be a dedicated PBCL complex, capable of functioning as a single demise or two separate premises. The PBCL complex would comprise the following internal accommodation and outdoor facilities:

- 865 PBCL studios in a range of sizes (each providing a double bed, lounge space, kitchenette, en-suite shower room and storage);
- front of house services and facilities (lobby, 24 hour reception, parcel room etc.);
- a range of shared internal amenity spaces (2613.19 square metres in total), including:
  - flexible co-working spaces;
  - games room;
  - social/lounge spaces;
  - shared kitchen and dining facilities;
  - laundry facilities; and
- four different outdoor amenity spaces in the form of two landscaped courtyards at Level 00 and two terraces at Level 02 of the building.

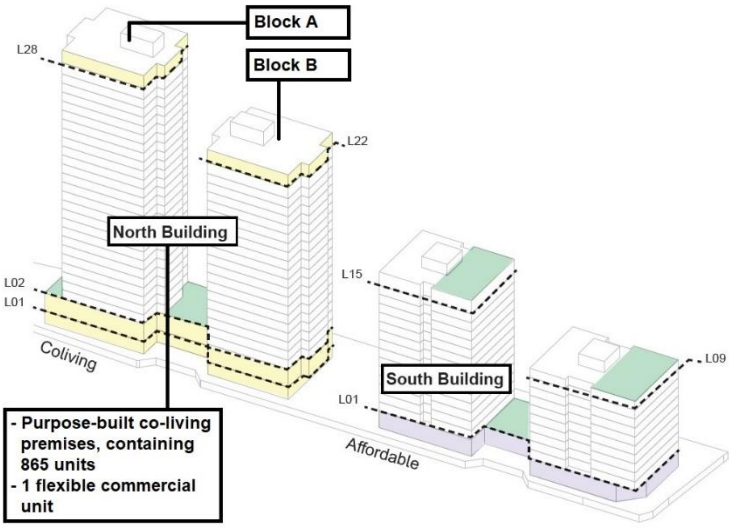


***Image 09** (above): Diagram of the proposed development, highlighting the North Building and providing key details about the uses it would contain.*



***Image 10** (above): View of Block B of the North Building.*

43. In addition to the residential accommodation, the North Building would contain a commercial unit (Class E use). This would be located at ground floor level with a principal entrance on Ilderton Road. It would provide 38 square metres (GIA) of non-residential floorspace. The lobby to the PBCL, spanning a long section of the Ilderton Road façade and featuring multiple glazed openings, would complete the North Building's ground floor frontage.

44. With regard to the form and appearance of the development, following the principles established by the extant planning permission, the base/plinth element would be of a notched rectangular footprint occupying most of the site's width. The two blocks rising out of the base/plinth element would each have a square floorplate with projecting wings to the north and south facades. The crown terminating both blocks would take the form of two-storey high bays formed of brick columns and beams.

45. The North Building's façades have been conceived in a regular gridded arrangement, with the bays formed of glazed openings and masonry-effect aluminium panels, interspersed by wide piers clad in red brick. The bays would feature a mix of concave and flat lintels, making for a slightly different detailed composition to their counterparts at the South Building (where only flat lintels are proposed). The façade modules at the lower levels would receive an additional level of detail and articulation in the form of slightly curved lintels. To provide visual interest up the full height of the building, each four-storey stack would be marked by a horizontal white band.



***Image 11** (above): Indicative material samples.*



***Image 12** (above): View of the body of the North Building, showing the façade design and materiality.*

46. At the ground level, soft landscaping would be provided along the North Building's Ilderton Road frontage. Alongside widened footways, an on-street fully inset layby measuring 12 metres in length would be provided as part of the public realm for the purposes of serving the development; it would be positioned centrally relative the front façade of the building, directly outside the main entrance to the PBCL. A small off-street gated parking area is also proposed, to the northern side of the building, containing three Blue Badge bays for use by eligible residents of the PBCL.

The South Building

47. Similarly to the North Building, the South Building would comprise two blocks, Blocks C and D, linked by a single-storey plinth/base. Block C would be 16 storeys in height plus additional rooftop plant (54.88 metres above ground level, 55.68 metres above Ordnance Datum). Block D would stand 10 storeys tall with additional rooftop plant (37.18 metres above ground level, 37.98

metres above Ordnance Datum). The South Building would incorporate a single-storey basement spanning the majority of the building footprint.

48. The proposed building would be almost entirely given over to housing, delivering:

- 186 flats (Class C3) in social rent tenure, 18 of which would be wheelchair accessible; and
- associated communal outdoor amenity space;
- a dedicated Blue badge car park for up to 3 vehicles; and
- refuse storage and cycle storage facilities.

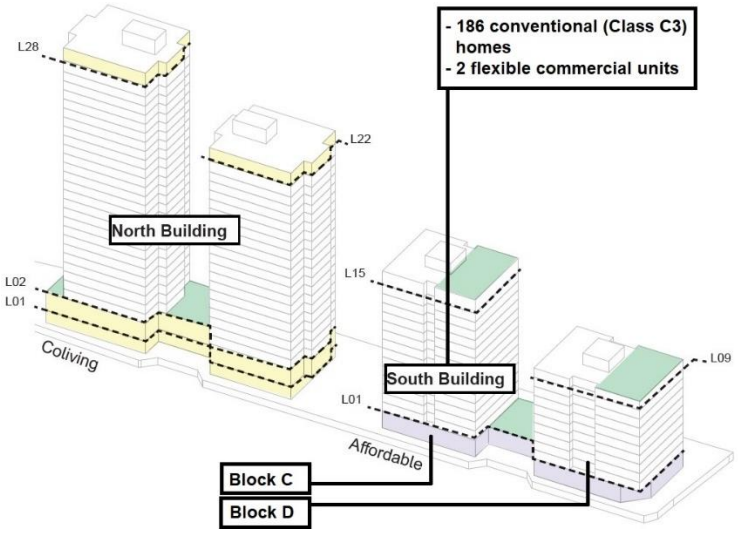


Image 13 *(above): Diagram of the proposed development, highlighting the South Building and providing key details about the uses it would contain.*



Image 14 *(above): View of the South Building from Ilderton Road.*

49. The South Building would also contain two commercial units at ground floor level, one of which has been designed with a supermarket in mind, with the other having the flexibility to be used for a community use. These would present principal frontages onto Ilderton Road, with shorter return frontages onto the proposed Pocket Park and John Berlyson Way. The two units would have Gross Internal Areas of 101 square metres and 257 square metres.

50. With regard to the form and appearance of the South Building, the single-storey plinth/base would have a footprint of a notched rectangular shape, at either end of which the two blocks would stand. These two blocks would be separated by a podium (first floor) residents' communal amenity space. Both blocks would feature projecting balconies on their north and south elevations, while on their east and west elevations all balconies would be inset. Both blocks would –like Blocks A and B at the North Building– be terminated by a crown comprising double height bays framed in brick, within which would be a mix of perforated panelling and glazed openings.

51. The façade modules of the South Building would comprise regular brick-faced piers brought together into a grid by masonry-effect spandrels spanning each individual bay and a deep brick-faced band demarcating every four storey stack. Additional detailing would be provided by a protruding masonry-effect string course at cill level. Window, door and balcony frames would all be finished in a grey tone. As with the North Building, the material palette would be composed of red brick and masonry-effect aluminium panels to ensure tonal consistency across all the development as a whole.

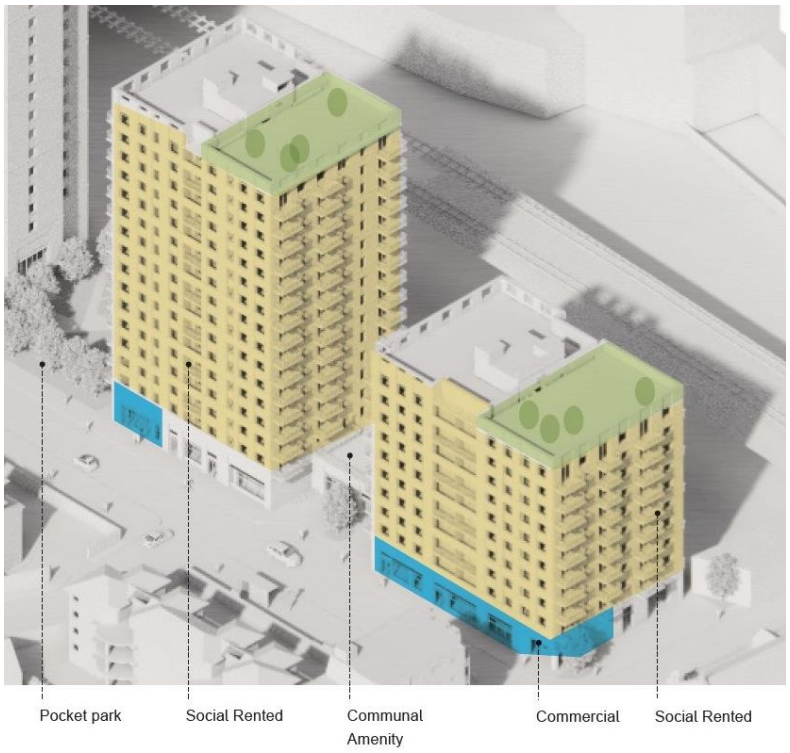


Image 15 *(above): Isometric of the South Building showing the distribution of the proposed uses and location of green spaces.*



Image 16 *(above): Rendered elevation of the South Building.*

52. At the ground level, the public realm along the South Building's Ilderton Road frontage would be mainly hard surfaced; however, there would be occasional at-grade planting beds. An on-street fully inset layby measuring 12 metres in length would be provided as part of the public realm for the purposes of serving the development; it would be positioned centrally relative the front façade of the building, directly outside the entrance to the conventional housing lobby. An integral three-bay car park is also proposed at the rear of the building with access from John Berylson Way.



Image 17 *(above): East elevation of the proposed development (i.e. looking from Ilderton Road), with the Pocket Park located between the blocks.*

Pocket park

53. Approximately 13% of the site is to be given over to a Pocket Park, a publicly-accessible open space of 738 square metres. To be located in-between the North and South Buildings, it would provide hard- and soft-landscaping, including 19 trees, along with play facilities and outdoor furniture.

54. Underpinned by the concept of 'bringing in the wild', the Pocket Park would be configured as four wedges, one of a more robust character and the other three 'softer' in nature, this arrangement being a consequence of a series of paths that dissect the park. The robust wedge would contain equipment such as a slide, climbing frame and platforms, while the soft wedges would be partly lawned and contain lower-level playful elements such as play trails, play bridges and timber decks.

55. The Pocket Park would be framed along part of its northern edge by the glazed frontage of the PBCL lobby. The southern side of the space would be fronted by one of the commercial units, which would have a set of doors onto the park but no spill-out dining area.

56. The boundary line between the park and the Ilderton Road footway would be defined by a decorative fence formed of steel with a Corten-style finish. The applicant envisages the Pocket Park as a social space where residents of the proposed development and members of the wider community, across all age groups, would be able to come together.

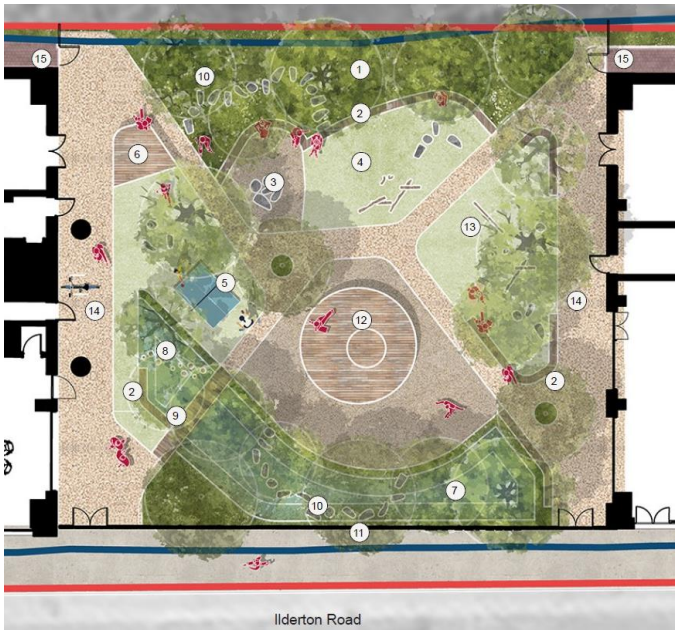


Image 18 *(right): Rendered plan of the proposed Pocket Park.*

Planning history of the application site and nearby sites

57. Appendix 3 sets out in detail the full planning history for the site as well as details of relevant applications on adjoining or nearby sites. The site benefits from extant planning permission, the reference number for which is 23/AP/0387. This was preceded by another grant of planning consent, the reference number for which is 18/AP/2497; however, this permission elapsed in February 2025.

58. The extant scheme was formally approved on 30th September 2024, following a resolution to grant by the Main Planning Committee in October 2023. The extant scheme comprises two buildings each formed of two blocks linked by a podium; in-between these two buildings would be a landscaped pocket park. The extant buildings decrease in scale towards John Berylson Way, with the tallest element standing to a height of 27 storeys and the lowest element rising to 10 storeys. The extant scheme is residential led with an affordable housing component of 40.9% by habitable room, together with commercial and retail spaces across the lower storeys of the development.

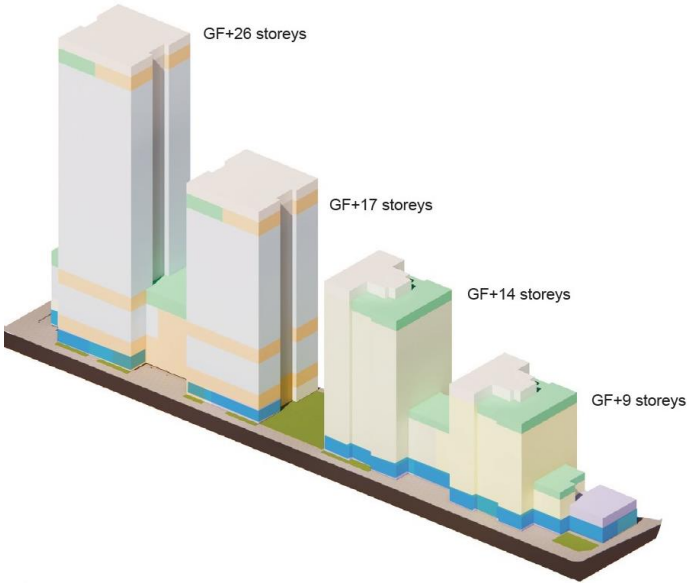


***Image 19** (above): Massing model of the residential-led development consented under the 23/AP/0387 planning permission.*



***Image 20** (above): Visual of the tallest part of the 23/AP/0387 scheme.*

59. The 23/AP/0387 application has the same 'red line boundary' as the newly-proposed scheme and the proposal is similar in its composition as two separate buildings framing a central publicly-accessible open space. However, there are some key differences, as follows:

- the conventional (Class C3) housing element of the 24/AP/3687 scheme would be entirely social rent, whereas the conventional housing within the extant permission was a mix of social rent and shared ownership tenures;
- the residential elements of the 24/AP/3687 would deliver a total habitable room equivalent of 1,442, whereas the total habitable room equivalent under 18/AP/2497 was 1,023;
- the 24/AP/3687 scheme would deliver a lesser quantum of flexible commercial and employment floorspace (396 square metres) compared to the 23/AP/0387 scheme (946 square metres);
- the blocks proposed in the 24/AP/3687 scheme would, in comparison with their counterparts in 18/AP/2497, be of a slightly widened floor-plate to allow for a more efficient core to unit ratio;
- Blocks B, C and D in the 24/AP/3687 scheme would be positioned slightly further south than their counterparts in 18/AP/2497, creating more equidistant spacing between the four blocks; and
- the Pocket Park at the centre of the site would, at 738 square metres, be larger in size than its counterpart in 18/AP/2497, which was 570 square metres.

60. The table and cross-section below provide a comparison of the consented storey heights against those proposed by this new planning application:

Storey heights: Summary table			
Building, Block	**Consented no. of storeys (metres AOD)**	**Proposed no. of storeys (metres AOD)**	**Change proposed vs consented no. of storeys (metres AOD)**
North, Block A	**27** (92.93)	**29** (95.97)	**+2** (+3.04)
North, Block B	**18** (65.25)	**23** (78.42)	**+5** (+13.17)
South, Block C	**16** (56.28)	**16** (55.68)	**Same** (-0.60)
South, Block D	**10** (37.83)	**10** (37.98)	**Same** (+0.15)
Note: The 'metres AOD' references above include all rooftop structures (pergolas, upstands etc.) as well as any enclosed rooftop storeys used for plant or lift overrun.			

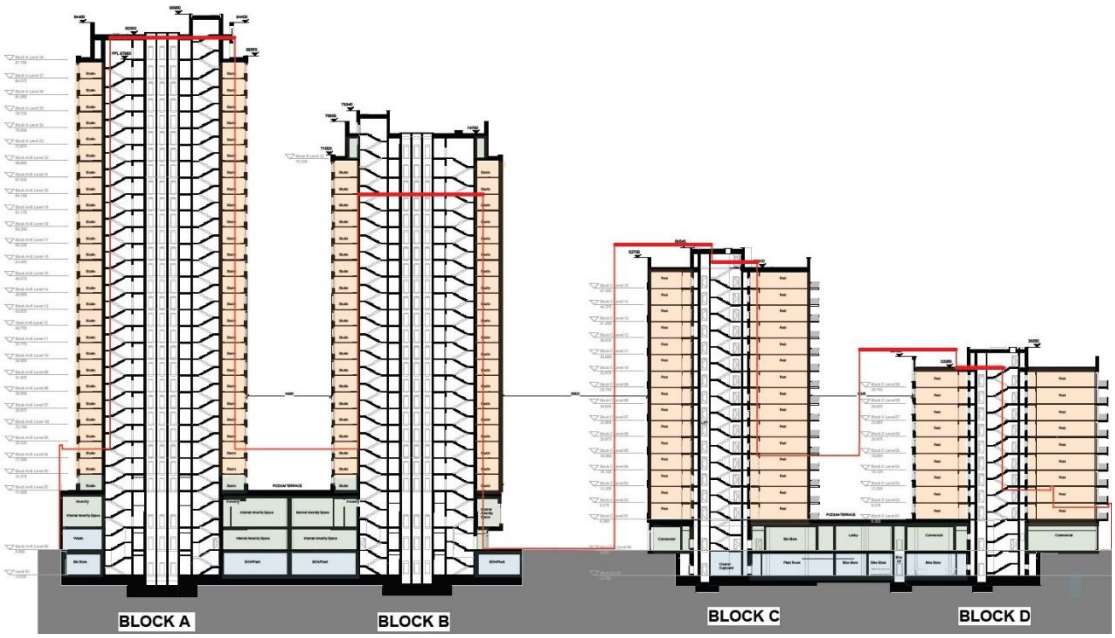


***Image 21** (above): Diagram showing the heights of the consented scheme 23/AP/0387 in red line, set against the new proposal 24/AP/3687.*

61. As an extant planning permission with no major planning barriers preventing technical implementation, the development proposed by 23/AP/0387, and the impacts it would cause as well as the mitigation it secured, are relevant material planning considerations in the determination of the new planning application here-under consideration.

***Image 22** (right): View of the 23/AP/0387 scheme looking north along Ilderton Road.*



Pre-application engagement and mid-application amendments

Pre-application engagement

62. Planning application 24/AP/3687 was submitted following a detailed pre-application enquiry, the reference number for which is 24/EQ/1094. The pre-application process involved three meetings and four workshops with Council planning officers, a meeting with the GLA and the applicant's attendance at the Old Kent Road Community Review Panel. During the course of the pre-application engagement, the applicant made various amendments to the scheme design such as:

- exploring the disposition of the four blocks on site to achieve the most neighbourly inter-relationship and maximise the size of the Pocket Park;
- developing the architecture and massing of the blocks to improve their legibility and identity;
- developing the mix and layouts of the proposed residential units;
- evolving the layouts of the ground floor storeys of all four blocks to optimise the relationship to the adjacent external spaces, improving active frontages in so doing;
- refining the landscaping of the Pocket Park and the resident-only communal outdoor spaces; and
- reconfiguring the provision of car- and cycle-parking facilities.



Images 23, 24 and 25 *(above, left to right): Evolution of the massing of the North Building (Blocks A and B) developing into a more refined form expressed as four-storey stacks.*



Images 26, 27 and 28 *(above, left to right): Evolution of the massing of the South Building (Blocks C and D), with the materiality becoming more similar to their neighbours but with more expressive elevations, featuring projecting balconies and recesses.*

63. At the end of this iterative process, the pre-application enquiry was closed and no formal response letter was issued by the Council.

64. With regard specifically to the Community Review Panel, the feedback was broadly positive. The Panel's feedback can be found in full at Appendic 6. A summary of the feedback, and how the applicant sought to address the issues raised, can be found in a later part of this report entitled 'Consultation responses from external consultees'.

65. The proposals were not presented to Southwark Council's Design Review Panel. The reasons for this are explained in the 'Design' section of this report.

Mid-application amendments

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

67. With respect to building design, changes included:

- refinements to the elevations of the proposed buildings;

- minor re-sizing of some rooms within the wheelchair conventional (Class C3) dwellings to ensure full dimensional compliance with Part M of the Building Regulations.

68. With respect to management of the PBCL, the draft Operational Management Plan was amended to include:

- commitments around bedding and linen supply;
- measures to manage as best as possible periods when the laundry facilities are in high demand;
- commitments to help achieve a seamless transfer of the premises from one operator to the next;
- confirmation that at least some of the wheelchair parking spaces at the base of the North Building will be allocated for move-in move-out activities during intense periods of move-in/move outs.

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

- an enlargement and reconfiguration of the basement-level cycle store within the North Building, increasing the cycle stand provision in so doing; and
- reconfiguration of the short stay cycling to improve visibility splays for vehicles emerging from the car park serving the North Building.

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

KEY ISSUES FOR CONSIDERATION

Summary of main issues

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

- Consultation responses from members of the public and local groups;
- Environmental impact assessment;
- Principle of the proposed development in terms of land use;
- Development viability;
- Tenure mix;
- Dwelling size mix;
- Quality of residential accommodation – PBCL;
- Quality of residential accommodation – Conventional housing;
- External amenity space and young people’s play space
- Amenity impacts on nearby residential occupiers and surrounding area;
- Design;
- Public realm, landscaping and trees;

- Green infrastructure, ecology and biodiversity;
- Archaeology;
- Transport and highways
- Environmental matters;
- Energy and sustainability;
- Communications and aviation;
- Socio-economic impacts
- Planning obligations;
- Mayoral and Borough Community Infrastructure Levies;
- Community engagement;
- Consultation responses; and
- Community impacts, equalities and human rights.

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

Legal Context

73. 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 draft OKR AAP 2024. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires decision-makers determining planning applications to pay special regard to the desirability of preserving listed buildings and their setting or any features of special architectural or historic interest which they possess.

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

Adopted planning policy

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

ASSESSMENT

Consultation responses from members of the public and local groups

76. Consultation with members of the public was first conducted in December 2024. Letters were sent to local residents, the application was advertised in the local press and site notices were displayed. Comments were received

from 1 respondent. The table below summarises the number of representations received during this period:

Original round of consultation: Summary table		
Total number of respondents: **1**	Total number of responses: **1**	
The split of views between the 1 respondents was:		
In objection: **0**	Neutral: **0**	In support: **1**

Reasons in support

77. Listed below are the material planning considerations raised in support of the planning application by the consultation responses.

Architecture, townscape and public realm

78.
- The development will contribute positively to surroundings;
- The development will achieve a high quality of design;
- The development will improve the surrounding public realm; and
- The development will improve the quality of the area.

Economic development

79.
- The development will contribute to regeneration; and
- The development will create economic vitality.

Environmental impact assessment

80. Environmental Impact Assessment is a process reserved for the types of development that by virtue of their scale or nature have the potential to generate significant environmental effects.

81. The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 set out the circumstances in which development must be underpinned by an EIA. Schedule 1 of the Regulations sets out a range of development, predominantly involving industrial operations, for which an EIA is mandatory. Schedule 2 lists a range of development types for which an EIA might be required due to the potential for significant environmental impacts to arise. Schedule 3 sets out that the significance of any impact should include consideration of the characteristics of the development, the environmental sensitivity of the location and the nature of the development.

82. The range of developments covered by Schedule 2 includes 'Urban development projects' where:

- the area of the development exceeds 1 hectare and the proposal is not dwellinghouse development;
- the development includes more than 150 dwellings; or
- the site area exceeds 5 hectares.

83. The site is approximately 0.47 hectares in size and is not located within or close to a 'sensitive area' as defined in Regulation 2(1). However, the proposed development does exceed the 150 dwellinghouse threshold and is therefore classified as a 'Schedule 2 development' for the purpose of screening. Schedule 2 developments are only 'EIA development' where they have the potential to give rise to likely significant effects on the environment by factors such as their nature, size and location. Therefore, the overriding determination for EIA is whether the proposed development is likely to result in 'significant' effects on the environment.

84. It should be noted that the Council issued a Screening Opinion in respect of the consented scheme in November 2022, the reference number for which is 22/AP/2766. It concluded that the proposed development did not constitute EIA development. The full Screening Opinion is available to read/download from the Council's Public Access for Planning register.

85. The buildings in the alternative scheme now proposed as part of 24/AP/3687 are of a broadly similar footprint and layout to the consented scheme, but Buildings A, B and C are taller and of slightly broader proportions. Although no Screening Opinion was sought by the applicant in advance of submitting 24/AP/3687, one does form part of the 24/AP/3687 suite of submission documents.

86. The Council is required to consider whether the planning application proposal would give rise to any significant environmental impacts that may make the proposal EIA development.

87. Planning application 24/AP/3687 proposes a housing-led scheme comprising a series of buildings, the disposition and heights of which are similar to those established by the previous/implemented planning consent on this site, together with public realm improvements and other associated works. The development is of a scale appropriate to its urban setting and is unlikely to give rise to any significant environmental impacts. Those impacts which are identified through the various submitted reports and studies can be mitigated through appropriate conditions or obligations.

88. For the above reasons, an EIA is not required in respect of the proposed development.

Principle of the proposed development in terms of land use

Existing lawful use

89. The existing site is a vacant hard-surfaced open air yard. Historically it was in residential use but was cleared after suffering bomb damage in the war; since then, it has remained a cleared site except for the installation of a telecommunications tower a number of years ago. Most recently, it was occupied by RS Joyner and Son to store redundant trucks before being sold online. The telecommunications tower was removed in mid-2020, leaving the site completely empty. Its lawful use is considered to be sui generis.

90. Given the above, there are no operable land uses located at the site —and, with this, no businesses or jobs— which have any degree of policy protection. The principle of development therefore depends on the suitability of the proposed uses against the development plan policies. The following paragraphs provide this assessment.

Relevant policy designations

Overarching strategic policy objectives

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

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

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

Old Kent Road Opportunity Area

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

94. London Plan Policy SD1 "Opportunity Areas" encourages opportunity areas to:

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

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

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

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

Examination in Public in the second half of 2025. As the document is still in draft form, it can only be attributed limited weight.

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

Southwark Plan Site Allocation

98. The Southwark Plan 2022 includes a site allocation, NSP 70 'Hatcham Road, Penarth Street and Ilderton Road', within the northernmost portion of which the application site falls. NSP 70 states that redevelopment of the site must:

- provide new homes (C3); and
- provide at least the amount of employment floorspace currently on the site (E(g), B class); and
- provide industrial uses failing within either of these use classes:
  - E(g)(iii) [any industrial process/use which can be carried out in any residential area]; or
  - B8 [storage and distribution]; and
- provide public open space of at least 1,990 square metres.

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

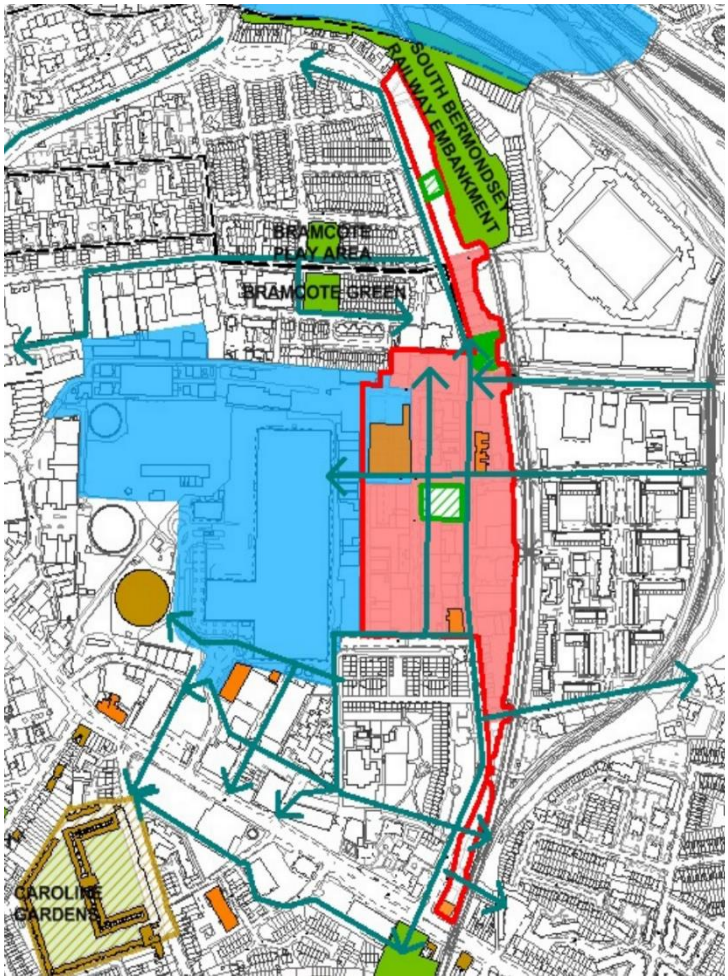


***Image 29** (left): NSP 70 of the Southwark Plan, at the very top of which is the application site, 79-161 Ilderton Road*

OKR AAP Site Allocation

100. The application site is located within the OKR 16 parcel of the draft AAP. This parcel, for which the draft AAP sets out a future growth vision, has a boundary identical to that of Southwark Plan Site Allocation NSP 70. Elements of the OKR 16 vision that are relevant to the 79-161 Ilderton Road site are:

- depot and industrial uses will be brought forward on land on the east side of Ilderton Road, where appropriate within mixed use development that provides new homes;
- new pocket parks will be delivered as well as greener and safer streets to improve the environment for people walking and cycling;
- new homes will be delivered to help create a vibrant new neighbourhood in which people can live and work; and
- the thriving creative business community will continue to represent the identity of the area.

101. The draft AAP sets out some 'must' deliverables of redevelopment within OKR 16. Those applicable to the 79-161 Ilderton Road site are:

- deliver new homes; and
- replace at least the current amount of employment floor-space on the site (Classes E[g] and B8), ensuring any such new floorspace is consistent with the building and land use types shown in Figure SA4.3, see right); and
- enable new east to west walking and cycling connections to the proposed Livesey Park; and
- provide a new cut-through pedestrian connection from the north of Ilderton Road through the arch at South Bermondsey Station.

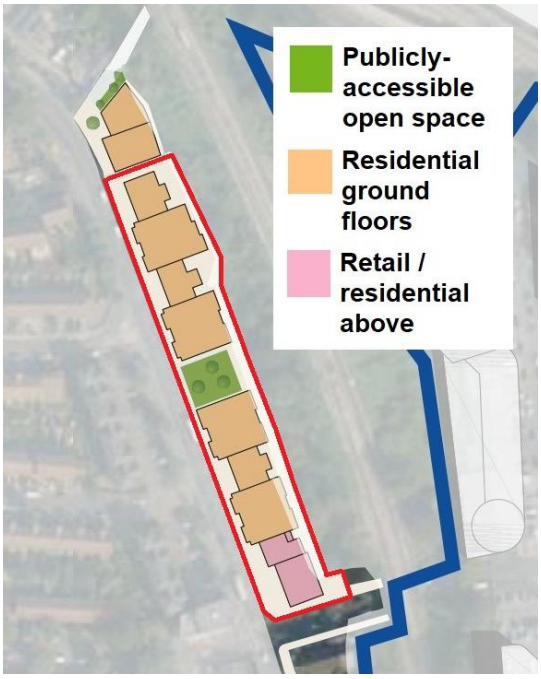


Image 30 *(above) Figure SA4.3 of the draft AAP, 'Building Typologies and Land Uses', cropped to the application site (edged in red)*

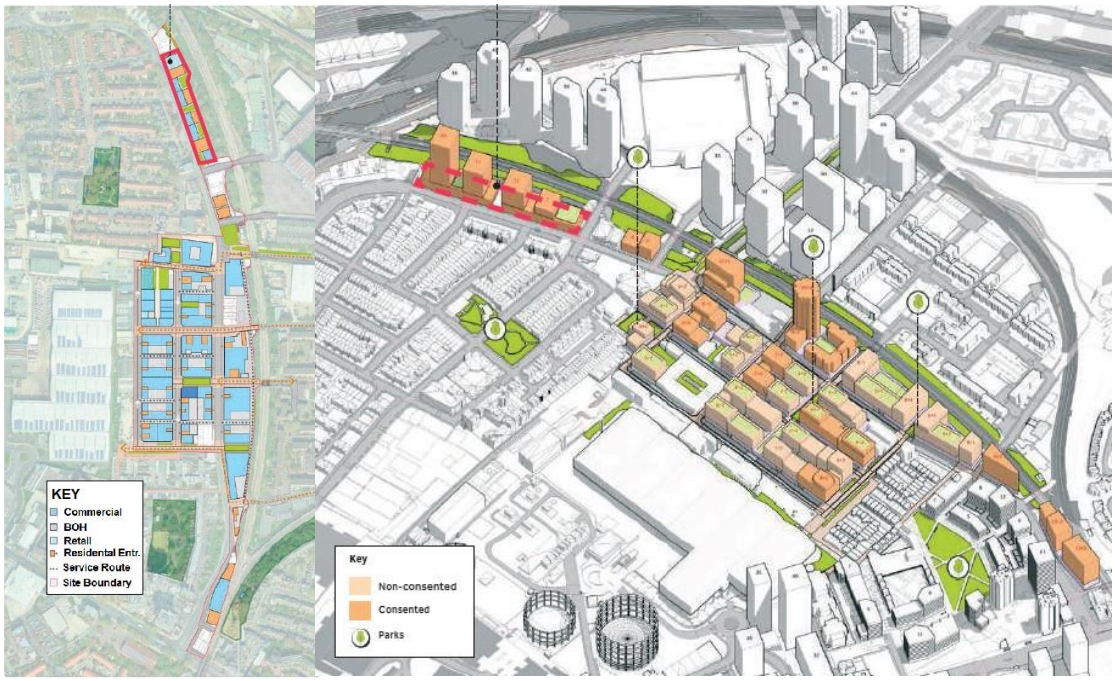
102. The draft AAP advises that redevelopment within OKR 16 may provide retail, community and education uses.

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

Hatcham and Ilderton Roads Design Code

104. The site is also subject to the Hatcham and Ilderton Roads Design Code, which sets targets and aspirations applicable to all new development within the area. The Code, which was prepared in accordance with the baseline standard of quality and practice set out in The National Model Design Code, is a continuation of the draft AAP, setting out in a greater level of detail the key design principles that developers will be expected to follow in order to gain planning permission. Although it is not intended to be absolutely prescriptive, the Code defines the parameters within which developments will be expected to come forward more tightly than the draft AAP. The Design Code for OKR 16 will be adopted as a Supplementary Planning Document (SPD) to the adopted AAP.

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



Images 31 and 32 *(above, left to right): Excerpts from the Hatcham and Ilderton Roads Design Code setting out principles of land uses and built form across the study area, showing the application site edged in red.*

Conclusion on policy designations, including response to the site allocations

106. The overarching thrust of polices within the Development Plan is to optimise and make effective use of land. The site is a long-standing and conspicuous gap in the urban fabric of the borough and presents a clear opportunity for optimisation.

107. The principle of redeveloping the application site for a housing-led development, providing a mix of conventional Class C3 dwellings and PBCL accommodation alongside flexible Class E/F (retail/service/dining/community) premises, is acceptable as it would bring into productive use this underutilised inner London site. The proposed mix and quantum of uses would support the role, functions and ambitions of the Opportunity Area and meet the expectations of the two site allocations, NSP 70 of the Southwark Plan 2022 and OKR 16 of the draft AAP.

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

Housing

Policy background

109. The London Plan sets the borough a target of providing 23,550 net new home completions over the next ten years. The targets are to be achieved by: allocating a range of sites for housing; encouraging development on appropriate windfall sites; and optimising the potential for housing delivery on all suitable and available brownfield land. In order to help meet this target – while also ensuring social and other infrastructure is delivered to create mixed

and inclusive communities as well as employment opportunities– London Plan Policy SD1 promotes mixed use development in opportunity areas, whereby functions such as retail and community are provided alongside housing.

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

111. At the local level, the Southwark Plan and draft OKR AAP reiterate the targets established by the London Plan. Policy ST1 'Development targets' of the Southwark Plan states that the Council "will work with our partners, local communities and developers to ensure that developments deliver the required growth and improvements to achieve our targets including 40,035 homes between 2019 and 2036 (2,355 new homes per annum)". Of the 40,035 homes, the Plan aims for 11,000 to be new council homes. In seeking to play its role in the delivery of these borough targets, the draft OKR AAP sets out the phased delivery of 20,000 homes by the year 2038.

112. The regeneration of the application site for housing-led development is promoted by the site allocations in the Southwark Plan and the draft AAP. Both NSP 70 and OKR 16 identify the allocation area's capacity as being 2,200 homes.

Assessment

Principle of housing

113. By delivering 865 PBCL studios and 186 conventional residential units, this planning application would contribute to realising the housing aspirations for the Opportunity Area, in line with London Plan Policy SD1, while also increasing London's housing supply, in accordance London Plan Policy H1.

114. The 1,051 proposed housing units are lent further support by the Southwark Plan and the draft AAP, which promote residential use on the application site in the quantum proposed. The proposed housing would create a mixed community in a well-connected inner London location, the accessibility rating of which is likely to rise significantly in the near future.

115. Having regard to all of the above, the provision of residential floorspace, in a mix of conventional Class C3 units and PBCL studios, is acceptable in principle. This is subject to the Class C3 dwellings and PBCL studios meeting the relevant policies concerned with unit sizes, quality of accommodation, management arrangements and standards of amenity; it is also subject to a compliant tenure mix being delivered across the development as a whole. These matters are discussed in later sections of this report

Contribution towards borough housing targets

116. Through its assessment of the deliverable housing sites in the borough, the Council can demonstrate a five year supply of housing land, plus the necessary 20% buffer required by the housing delivery test. As the application site forms part of an identified 'allocation' in the Southwark Plan, its redevelopment for housing has been anticipated by the borough-wide assessment of deliverable housing sites. The borough-wide assessment attributed an indicative capacity of 312 new homes to the site; this was based on the number of homes proposed in a historic (now expired) planning permission, 18/AP/2947. The proposed development would, therefore, make its contribution towards meeting the Council's housing targets.

117. It is also important to note that the PBCL would reduce pressure on the local private rented market, in that it would release back to the private rented sector hundreds of single dwellings (including traditional family sized dwellings) that would otherwise be in occupation.

118. With regard specifically to affordable housing, there is a pressing need at the local level, with 12,333 households on the borough's Housing Association waiting list as of 31 March 2024. The 186 proposed social rent units would in particular help ease this pressure, delivering quality low-cost accommodation for Southwark residents, while also assisting the Council in its aim to provide 11,000 new council homes by 2043 as part of the overall target of 40,035.

Old Kent Road Housing Delivery Plan

119. The Greater London Authority (GLA) and Transport for London (TfL) officers have worked closely with Southwark Council officers to agree the broad geography and phasing of development across the area covered by the draft AAP, to help provide certainty to communities, local businesses and developers in advance of the Bakerloo Line Extension (BLE) and a clear timetable for its delivery. This has resulted in broad agreement between the GLA, TfL and Southwark Council on the scale and geography of the area's new town centres, where industrial uses will be retained, replaced and intensified, and how housing delivery will be phased in advance of the BLE. Broad alignment and the location of potential tube stations has also been agreed between Southwark Council and TfL, and formal safeguarding is in place.

120. As part of the collaborative process outlined above, and as per AV.13 'Old Kent Road Area Vision' of the Southwark Plan and Policy P2 of the draft AAP, a Housing Delivery Plan has been introduced. This comprises two consecutive phases, Phase 1 and Phase 2. For Phase 1, there is a cap of 9,500 net additional homes. Any scheme granted permission after the cap has been met would fall into Phase 2 and be subject to a Grampian agreement linked to BLE delivery. Phase 2 schemes will only be eligible for implementation once a BLE construction contract is in place. In respect of the OKR Housing Delivery Plan only (i.e. not in respect of strategic housing targets), the Local Planning Authority and TfL have agreed that a 3:1 conversion rate can be applied in respect of PBCL schemes, where three PBCL units equate to one conventional (Class C3) dwelling.

121. The 79-161 Ilderton Road site benefits from an extant planning permission for 322 dwellings. Planning application 24/AP/3687 puts forward an alternative form of development for the site, which —applying the 3:1 conversion rate agreed with TfL— would deliver the equivalent of 474 dwellings. This is calculated as follows:

    - one third of the 865 PBCL units (rounded to the nearest whole number, which is 288); plus
    - the 186 conventional homes.

122. This represents an uplift of 152 homes on the extant planning permission

123. In the event of a resolution to grant permission for the 24/AP/3687 proposal, the Section 106 Agreement will incorporate a 'surrender' covenant requiring the owner to 'give up' the right to develop under the existing planning permission.

124. In the wider context of extant planning permissions and live planning applications across the Old Kent Road Opportunity Area, the pipeline of homes currently stands at the equivalent of 9,061 dwellings, If planning permission is granted for the new 79-161 Ilderton Road proposal and the 23/AP/0387 consent is simultaneously surrendered, this would bring the total number of homes within Phase 1 to the equivalent of 9,535 dwellings. This is summarised by the table below:

Delivery of Old Kent Road Housing Delivery Plan: Summary table	
Phase 1 schemes by status	**No. of homes**
Extant planning permissions incorporating residential use(s)	7,349
Planning applications incorporating residential use(s) that benefit from a resolution to grant planning permission, but are pending completion of a legal agreement ^	591
Planning applications incorporating residential use(s) without a resolution to grant as yet *	712
The 23/AP/0387 planning application	474
Total of all Phase 1 schemes	9,535
Surplus/shortfall relative to the 9,500-home cap	Surplus of 35

^ *These applications are 20/AP/3822 (95 Haymerle Road), 21/AP/1667 (310-330 St James's Road), 22/AP/1603 (118-120 Ormside Street and 16-28 Penarth Street) and 23/AP/0582 (19-35 Sylvan Grove), proposing 31, 161, 141 and 252 homes respectively.*

* *These applications are 24/AP/3687 (79-161 Ilderton Road) and 24/AP/3575 (1-7 Rollins Street), proposing 474 and 238 homes respectively.*

125. The Local Planning Authority is currently in a number of pre-application discussions about reducing or removing altogether the housing component from some extant Phase 1 planning permissions. It is also possible that extant permissions for housing will lapse, which would reduce the total number of homes in Phase 1, potentially releasing extra capacity beneath the 9,500 home ceiling. With this in mind, and given that the proposal hereunder consideration would result in a breach of the 9,500 home cap by a very small number, on balance the Opportunity Area would not experience any undue infrastructural burden as a consequence of the 35-home breach. As such, 24/AP/0387 will be treated as a Phase 1 development and will not be subject to the Grampian agreement.

126. The inclusion of the surrender clause in the Section 106 Agreement will give clarity and certainty to the housing pipeline within the Old Kent Road area, enabling the Local Planning Authority to make optimum use of any headroom beneath the 9,500 home ceiling that may be released by developers seeking alternative uses on sites where housing has been consented previously.

Conclusion on the provision of housing

127. With residential uses being supported on this site at all policy levels, in land use terms the proposed housing is acceptable. It would make a major contribution to meeting the Mayoral and local-level housing delivery targets, exceeding the indicative capacity of 312 homes as forecasted by the Southwark Plan, thereby providing some windfall housing. Furthermore, bringing forward the development within Phase 1 of the Old Kent Road Housing Delivery Plan would not result in any undue infrastructural burden in advance of the Bakerloo Line Extension.

Purpose Built Co-Living (PBCL)

Housing typology background

128. This planning application proposes 865 PBCL units within the North Building, equipped with internal and external amenity spaces for the occupiers.

129. PBCL provides a rental option for single person households who cannot or choose not to live in self-contained homes or HMOs. PBCL units are not restricted to particular groups by occupation or specific need such as students, nurses or people requiring temporary or emergency accommodation. Much of the demand for PBCL comes from graduates and young professionals starting out in their career. PBCL is classified as non self-contained accommodation and a ‘sui generis’ use in the Use Classes Order. It is considered as ‘housing’ for monitoring purposes through the Council’s and GLA’s monitoring reports.

Policy background

130. Policy H16 of the London Plan recognises the need for PBCL developments within London, and acknowledges the contribution this typology can make to alleviating housing strain and raising standards across the rented sector in

terms of the quality of accommodation and the security of tenancy. The policy makes clear that PBCL schemes must contribute to affordable housing; however, because this form of accommodation does not meet minimum housing space standards it is not considered suitable as a form of affordable housing itself.

131. All PBCL schemes are subject to the Viability Tested Route; however, developments that provide a contribution equal to 35% of the units at a discount of 50% of the market rent are not subject to a late-stage viability review.

132. Aside from viability considerations, Policy H16 also sets out strategic and detailed design requirements for PBCL. The policy provides a set of ten criteria that PBCL proposals must meet, encompassing themes of:

- locational suitability;
- contribution to the social make-up of the neighbourhood;
- design quality and occupier facilities;
- management; and
- contribution towards conventional (Class C3) affordable housing.

133. At the local level, Southwark Plan Policy P6 requires developments incorporating PBCL to deliver, as a first priority, at least 35% of the gross housing on-site as conventional affordable housing (calculated by habitable room) on site. Policy P6 is structured in recognition of the acute need for more family and affordable housing within the borough, as explained in the policy's supporting notes:

"Allowing too much purpose built shared living accommodation will restrict our ability to deliver more family and affordable housing. By requiring an element of affordable housing or contribution towards affordable housing from purpose built shared living accommodation we can make sure we work towards meeting the strategic need for this accommodation and our local need for affordable homes including affordable family homes".

134. Although Policy P6 states "All purpose-built shared living schemes will require a viability appraisal to be submitted", in circumstances where conventional (Class C3) on-site affordable housing is being provided alongside the PBCL, and the conventional affordable housing is offered at a level that meets or exceeds the Council's Fast Track threshold, the requirement for a FVA falls away as per Policy P1 (sub section 4) of the Southwark Plan. The Mayor's draft Affordable Housing LPG, for which consultation closed in July 2023, includes (at paragraph A2.5.3) provision that PBCL schemes may now provide their affordable housing contribution on site and follow the Fast Track Route, where meeting the relevant threshold.

135. Where conventional (Class C3) affordable housing cannot be provided on site, a cash payment towards the delivery of new council homes will be required. The value of any contributions will be based on the cost of meeting an on-site

affordable housing requirement and should provide no financial benefit to the applicant.

136. The consequence of the local-level policy requirements as summarised above is that, in circumstances where a mix of PBCL and conventional housing is proposed, two pathways are available to the applicant depending on the level of affordable housing the proposal will provide. The two pathways are:

a) the Viability Tested Route: this pathway must be followed where the level of affordable housing provided within the development would not meet the Council's Fast Track threshold; or

b) the Fast Track Route: applicants are eligible for this pathway where 40% or more of the total proposed housing would be:
- on-site conventional (Class C3) affordable housing in a policy compliant tenure mix; or
- a cash in lieu equivalent of on-site conventional (Class C3) affordable housing in a policy compliant tenure mix; or
- some on-site conventional (Class C3) affordable housing in a policy compliant tenure mix, supplemented by a cash in lieu contribution sufficient to raise the effective level of affordable housing to at least 40%.

137. Policy P6 does not set out any strategic and detailed design requirements for PBCL accommodation, nor does any other policy within the Southwark Plan.

Assessment

138. The following paragraphs of this report assess the proposed development against the ten considerations set out under Policy P16 of the London Plan. The matter of affordable housing provision and the associated viability considerations are dealt with in a later part of this report.

Criterion 1: Is the PBCL of good quality and design?

139. The North Building, which would house the PBCL premises, would achieve a high quality of architectural design, as discussed in detail in a subsequent part of this report entitled 'Design quality'.





Image 33 *(above left): Rendered view of the North Building's carefully-modelled façade comprising red brick piers either side of bays headed by concave lintels.* ***Image 34*** *(above right): Visual of a non wheelchair accessible studio.*

140. The PBCL accommodation would consist of acceptably-sized and well-equipped en-suite private studios. The quality of the PBCL accommodation can be distinguished from Houses in Multiple Occupation (HMOs) by the range of high-quality managed communal amenity spaces that accompany the private studios; at the 79-161 Ilderton Road site, these proposed communal spaces would include a lounge with bar, multiple outdoor terraces and generous co-working spaces.

141. The Mayor's 'Large-scale Purpose-built Shared Living LPG' sets out detailed design standards PBCL developments should strive to achieve. A later part of this report provides a detailed assessment of the PBCL accommodation against the criteria set out in the LPG, but in summary it is considered to be of an exemplary quality, thereby meeting Criterion 1 of Policy P16.

Criterion 2: Does the PBCL contribute towards mixed and inclusive neighbourhoods?

142. The planning application is supported by a Economic Benefits Statement, which anticipates that the proposed PBCL and conventional (Class C3) affordable housing will attract a diverse range of individuals and families to this 'tenure-imperceptible' development.

143. To help these households of differing sizes and from across a range of incomes to integrate, a number of on-site shared facilities are proposed. The Pocket Park, located in-between the PBCL premises and the conventional housing, would provide opportunities for the PBLC occupiers and the local community to socialise and relax together. Other on-site facilities include commercial spaces that could potentially be operated as retail and/or dining outlets; these would

provide further opportunities for the PBCL and conventional housing residents to mix.

144. The PBCL element of the proposed development would be the second of its kind within the Old Kent Road Opportunity Area, should the recently-consented 281-unit scheme at 18-22 Penarth Street be built out. There is a low representation of PBCL schemes within the wider area, and a number of conventional private and affordable housing schemes are under construction or recently completed in Ilderton Road, such as 62 Hatcham Road (100% affordable), 180 Ilderton Road (100% affordable) and 227-255 Ilderton Road (40% affordable). Therefore, even in the event that both PBCL schemes were implemented, it is not considered that together they would negatively impact the neighbourhood in terms of the mix of uses and inclusivity.

145. The Southwark Licensed Houses in Multiple Occupation (HMO) Register indicates that there are around 800 registered HMOs within the SE15 postcode and approximately a further 650 HMOs within SE16 to the north, which demonstrates a significant need in the area for single occupancy accommodation. It is therefore considered that this development, being a new form of rented accommodation, would be able to provide a significant number of single occupant homes in the area at a more affordable rate for single income earners.

146. For the reasons given above, the proposed land use is considered to be in conformity with Criterion 1 of London Plan Policy H16.

Criterion 3: Is the site in a well-connected location?

147. The site currently has a low PTAL of 1b to 3. In spite of this rating, it does benefit from a range of easily-accessible transport options. For example, the South Bermondsey Overground Station is located a few minutes' walk to the north, and regular bus services are available from Ilderton Road directly to the front of the site.

148. As part of the Surrey Canal Triangle redevelopment (a large regeneration scheme at New Bermondsey in the neighbouring borough of Lewisham), it is intended to build a new London Overground station; the station entrance would be approximately 350 metres to the east of the site. Additionally, the extension of the Bakerloo Line from Elephant and Castle to New Cross would improve underground links into central London and to Lewisham. Taking these future infrastructure enhancement projects into account, the site's public transport accessibility is projected to rise to PTAL 4.

149. Criterion 3 of Policy H16 also requires that, through design, PBCL development does not contribute to car dependency. The PBCL proposed at 79-161 Ilderton Road would be car free (with the exception of 6 accessible blue badge spaces for both the PBCL and affordable housing uses) ensuring there would be no contribution to car dependency. The proposed development includes the provision of safe and secure cycle parking to encourage the use of sustainable modes of transport. The site's location will enable cyclists to take advantage of

the proposed Cycle Future Route 12 (also known as Cycleway 62) that, once delivered, will run along southern section of Ilderton Road.

150. For the reasons given above, it is considered that the proposed land use would not contribute towards car dependency, and is thus in conformity with Criterion 3 of London Plan Policy H16.

Criterion 4: Is the PBCL under single management?

151. An Operational Management Plan has been submitted with the application setting out how Fresh would provide day-to-day management and long term operation of the PBCL premises. As such, the proposal complies with Criterion 4 of London Plan Policy H16.

Criterion 5: Are all units for rent with minimum tenancy lengths of at least three months?

152. The tenancy lengths for the shared living development will be a minimum of 3 months. This will be secured in the S106 Agreement. This satisfies Criterion 4 of London Plan Policy H16.

Criterion 6: Are the communal facilities and services sufficient and of good quality?

153. Criterion 6 of Policy H16 sets out six sub-criteria that PBCL proposals must satisfy if the needs of the intended number of residents are to be met. These sub-criteria relate to the quality and extent of communal facilities (kitchens, other internal recreational areas, external amenity spaces, and laundry/drying facilities) as well as the services residents would benefit from, such as presence of a concierge.

154. The Mayor's Large-scale Purpose-built Shared Living LPG recommends the following benchmarks of total internal communal amenity space provision:

Benchmarks for quantum of internal amenity space: Summary table		
Number of residents	**Benchmarked internal amenity space**	**Benchmarked external amenity space**
Up to 100	4 sqm per resident	1 sqm per resident
Every extra resident from 101 to 400	3 sqm per extra resident	0.5 sqm per extra resident
Every extra resident from 401	2 sqm per extra resident	

155. Applying the above recommendations to the proposed PBCL premises generates the following internal amenity space requirements:

- Block A (with its occupancy of 466 residents): 1,432 square metres
- Block B (with its occupancy of 399 residents): 1,297 square metres.

156. Applying the above recommendations to the proposed PBCL premises generates the following external amenity space requirements:

- Block A (with its occupancy of 466 residents): 283 square metres
- Block B (with its occupancy of 399 residents): 249.5 square metres.

157. Below is a table providing an overview of the functions, quantum and locations of the communal facilities within the PBCL premises proposed by this planning application:

Communal facilities within the Block A PBCL premises: Summary table		
Internal		
Floor	**Facility**	**Size (sq.m) GIA**
Level 00	Residents' reception and lobby	230.43
Level 01	Gym	131.46
	Yoga studio	41.96
	Sauna	30.57
	Co-working and communal kitchen	164.57
	Private dining	40.66
	Kitchen / dining	115.4
	Multi-faith room	6.68
	Games and laundry	82.80
Mezzanine	Lounge / dining	77.30
Level 02	Terrace rooms	51.70
Level 28	Sky library / quiet co-working	77.72
	Private dining	37.50
	Private dining 2	24.60
	Cinema room	28.30
	Games area	99.03
	Poker room	23.03
	Boardroom	21.76
	Sky bar / lounge	53.16
Total:		1338.63
Shortfall/surplus relative to PBSL LPG recommend'n:		84.37
Average per PBCL studio:		2.87
Levels 00-01	Back-of-house space, namely: Toilets; Storage; Parcel store; Washer/Dryer Service Room; and Reception/office.	40.20
External		

Floor	Facility	Size (sq.m) GIA
Level 00	East courtyard	218.0
Level 02	Northern terrace	82.0
	Central terrace (northern portion)	128.0
Total:		428.0
Shortfall/surplus relative to PBSL LPG recommend'n:		Surplus: 145.0
Average per PBCL studio:		0.92

Communal facilities within the Block B PBCL premises: Summary table		
Internal		
Floor	**Facility**	**Size (sq.m) GIA**
Level 00	Residents' reception and lobby	287.30
Level 01	Coworking	142.95
	Podcast room	9.30
	Laundry	33.65
	Yoga	50.14
	Gym	86.59
	Spin studio	35.23
	Kitchen / dining	170.50
Mezzanine	Lounge / dining	77.50
Level 02	Terrace room	19.60
Level 22	Sky library / quiet co-working	64.60
	Private dining	39.37
	Private dining 2	39.35
	Cinema room	33.50
	Games area	83.66
	Poker room	36.31
	Boardroom	25.49
	Coworking/meeting	39.52
Total:		1274.56
Average per PBCL studio:		3.19
Shortfall/surplus relative to PBSL LPG recommend'n:		22.40
Levels 00-01	Back-of-house space, namely: Toilets; Storage; Parcel store; Washer/Dryer Service Room; and Reception/office.	35.50
External		
Floor	**Facility**	**Size (sq.m) GIA**
Level 00	East courtyard	127.0

	Northern edge of Pocket Park (excl. the 24 sq.m area that would be under a building canopy)	162.0
Level 02	Central terrace (southern portion)	125.0
Total:		414.0
Shortfall/surplus relative to PBSL LPG recommend'n:		Surplus: 164.5
Average per PBCL studio:		1.04

158. Purely in spatial terms, the total quantum of useable internal communal amenity space proposed at Blocks A and B would fall short of the Mayor's recommended benchmark. However, in both cases it would so by only a relatively small amount. It should also be noted that, although the proposal is being assessed against the policy and guidance as two separately demised PBCL premises, it has been designed flexibly such that it could be operated as a single 865-unit property, in which case the Mayoral benchmark (of 2,230 square metres) would be exceeded by the total internal amenity offer (2613.19 square metres). A further important point to note is that the Mayor's LPG states:

"*Some flexibility in the assessment of LSPBSL applications against these recommended benchmarks may be applied to the design, scale and provision of these facilities in consideration of the site's location and context, or other scheme-specific factors where it is demonstrated that qualitatively good design outcomes are being achieved".*

159. A diverse range of spaces would be provided, all accompanied by appropriate equipment, furniture and services. With respect to the external spaces, the range in sizes and locations is welcomed, as is the overall quantum, which for both Block A and Block B well exceeds the benchmark recommended by the Mayor.





Image 35 *(above left) and* ***Image 36*** *(above right): Precedent images supplied by the applicant, giving an impression of the envisaged 'look and feel' of the lounge and lobby areas within the PBCL.*

160. The residents would not incur additional fees for usage for any of the internal amenity spaces (potentially with the exception of the spa) included in the calculation above. All-inclusive usage of for residents will be secured in the Section 106 Agreement.

161. A later part of this report entitled 'Quality of residential accommodation – PBCL' provides a detailed assessment of the PBCL communal amenity spaces

against each of the sub-criteria under Criterion 6 of Policy H16. It also assesses the scheme against relevant design quality considerations in the Southwark Plan and the Mayor's 'Large-scale Purpose-built Shared Living LPG'. It concludes that the communal facilities would be of a high quality. As such, it is considered that Criterion 6 of Policy H16 has been satisfied.

Criterion 7: Are the individual studios adequately sized and laid out, and future-proofed against self-containment?

162. The proposed PBCL studios would not comply with the legal definition of a dwelling in that they would not individually contain all of the facilities required for day-to-day domestic living and, as such, are incapable of being used as self-contained homes. They are clearly designed as part of a wider community with reliance of the shared amenity facilities, with a view to creating an integrated community. In this regard, the proposed studios constitute a Sui Generis use.

163. A detailed appraisal of the size and layout of the individual studios, including an assessment against the criteria set out in the Mayor's LPG, is provided in a later part of this report entitled 'Quality of residential accommodation – PBCL'. The detailed appraisal concludes that the units would be of an acceptable size and logical layout, and as such it is considered that Criterion 7 of Policy H16 has been met.

Criterion 8: Is the PBCL supported by a management plan?

164. As mentioned previously in this section of the report, the PBCL premises will be managed by Fresh. An Operational Management Plan has been submitted with the application setting out how the operator will manage the accommodation on a day-to-day basis and ensure the long-term quality of the development in a way that supports the community. Further detail about the provisions within the Operational Management Plan is given in a later part of this report entitled 'Amenity impacts on nearby residential occupiers and the surrounding area'.

Criterion 9: Has a cash in lieu contribution towards conventional C3 affordable housing been secured?

165. Alongside the PBCL premises, the proposed development would incorporate 186 conventional Class C3 dwellings. All 186 of the dwellings would be social rent. This conventional housing amounts to 40.0% (by habitable room) of the total housing on the site.

166. Given the provision of a quantum of affordable conventional housing on-site that meets the Fast Track thresholds of both the Mayor and the Council, thus exempting the proposal from an application-stage viability review, a cash in lieu payment is not required. The Section 106 Agreement will secure an Early Stage Review in the event that implementation fails to occur within two years of planning approval.

167. This matter is discussed in detail in a later part of this report entitled 'Development viability'.

Conclusion on PBCL

168. The proposed PBCL would comply with the ten criteria of London Plan Policy H16, providing a suitably-located premises of high quality design, with the accommodation to be under single management and all tenancies to be at least three months in duration. As detailed in a later part of this report entitled 'Quality of Accommodation – PBCL', the individual units and communal spaces have been well designed in terms of spatial arrangement, internal environmental conditions and level of amenity, in accordance with the criteria of Policy H16 as well as the relevant parts of the Southwark Plan. As a level of on-site affordable housing would be delivered that exceeds the Fast Track threshold, the proposed PBCL does not trigger a payment-in-lieu.

Flexible commercial (retail/service/dining/office) and community use

169. This planning application proposes two units in a flexible commercial use and one in flexible commercial/community use. Details are provided below.

Flexible commercial and community units: Summary table		
Unit name and location	**Sought use classes**	**GIA (sq. m)**
Unit 1 (North Building)	Class E[a] through E[g]	38
Unit 2 (South Building)	Class E[c] and Class F2[b]	101
Unit 3 (South Building)	Class E[a] through E[g]	257
Total		396
Comparison with extant permission		
Quantum of commercial/community floorspace compared to the extant planning permission (23/AP/0387)		-548 sq.m

170. Class F2[b] use relates specifically to halls or meeting places for the principal use of the local community. Class E comprises various sub-categories, as listed below, encompassing a wide range of uses:

- [a] conventional retail;
- [b] dining (excluding pubs and bars);
- [c] financial and professional services;
- [d] indoor sport, recreation or fitness (e.g. gym);
- [e] medical or health services;
- [f] crèche, day nursery or day centre;
- [g] office or light industrial process capable of being carried out in any residential area without detriment to amenity.

Policy background – retail/service/dining uses

171. In opportunity areas, London Plan Policy SD1 places focus on the need to support development that creates employment and provides the necessary social and other infrastructure to sustain growth and create mixed and inclusive communities. Although it seeks to limit retail and local services to town centres only, the policy does recognise that retail may be appropriate in non town centre locations under-served by local convenience shopping and related services, and where those new facilities would serve existing and/or new residential communities.

172. London Plan Policy SD7 states that, when considering development proposals, boroughs should take a 'town centres first' approach, discouraging out-of-centre development of main town centre uses and, where out-of-centre commercial uses are proposed, considering the impact they may have on the vitality and viability of town centres.

173. At the local level, Policy P38 of the Southwark Plan is concerned with shops outside protected shopping frontages, town and local centres. Although it expects retail uses to be provided in the town centres, it does recognise that shops and other local services outside of these designated areas can provide a convenient service to help make people feel part of a community and do their shopping with minimal travel. The Southwark Plan provides support for uses with active frontages that promote activity and successfully engage with the public realm in appropriate locations.

174. Southwark Plan Policy P35 requires any proposed retail uses in opportunity areas to be conditioned so as to restrict change of use within Class E. Retail uses are defined as those falling within Classes E[a], E[b] and E[c] – which encompasses shops, post offices, cafés, restaurants, banks, building societies, professional services, estate agents and employment agencies. Uses such as indoor sport and recreation, crèche/nursery and offices fall outside the E[a], E[b] and E[c] classifications.

175. Both the Southwark Plan and draft AAP allocations within which the 79-161 Ilderton Road site is located state that redevelopment "may" provide retail uses, with the draft AAP allocation indicating the southern edge of the site as being in particular a suitable location for retail.

Policy background – employment/business uses

176. London Plan Policy SD1 provides support for developments that create employment opportunities. London Plan Policy GG5 requires local planning authorities to plan for sufficient employment and industrial spaces to support economic growth. Policies E1 and E2 deal specifically with the provision of business floorspace (Class E[g] use, formerly Class B use), with a focus on securing good quality, flexible and adaptable office space at varying sizes in the CAZ and town centres; however, these two policies also recognise that business space in non-prime locations can play a valuable role in providing low-cost alternatives for SMEs and start-ups. London Plan Policy E11 requires

development proposals to support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases.

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

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

Policy background – community uses

179. With regard specifically to community uses, both London Plan Policy S1 and Southwark Plan Policy 46 support the delivery of new high-quality facilities provided they are available for and accessible to all members of the community. Furthermore, both the Southwark Plan and draft AAP allocations state that redevelopment of the application site “may” deliver community uses.

Assessment

180. The three proposed commercial units would bring productive economic uses to the site that would support the resident and working populations. The uses would successfully integrate and co-exist with the PBCL and conventional housing units on the floors above.

181. Being part of the Opportunity Area, the application site is in a location undergoing large-scale change, the result of which is that the local resident population will rise substantially in the coming years. Furthermore, the site is situated very close to South Bermondsey Station, the Millwall Football Club and a potential new overground station (New Bermondsey) on Surrey Canal Road. For these reasons, there is likely to be a rise in footfall along Ilderton Road as well as an increased local demand for retail, dining, office, professional and financial services.

182. The total amount of floorspace that could potentially be used for retail purposes would be under the 1,000 square metre threshold set by Policy P36 for triggering an impact assessment. In any event, it is not considered that the introduction of retail uses in this location would harm the vitality and viability of any nearby town centre, being sufficiently distant from the three closest centres: Old Kent Road High Street would be 700 metres away, the Blue 700 metres away and Canada Water 750 metres away. By virtue of the units' size, they would only be capable of providing convenience retailing rather than large-scale retailing, the type of which would be better placed on the Old Kent Road. Such convenience retailing would usefully serve the local catchment in a part of the Opportunity Area where at present there is a very limited number of retail outlets.

183. As part of pre-application engagement carried out with the community, the applicant identified a local appetite for a community centre, a supermarket, workspace and/or storage facilities in this part of the Old Kent Road Opportunity Area.

184. In light of this community feedback, and although this planning application seeks full flexibility of use for the units, the applicant's aspiration is for Unit 3 to be operated as a supermarket. Unit 3 has been specifically sized for this purpose, being just under the 280 square metre maximum size allowed under the Sunday Trading Hours laws for express-style convenience retailing. Accordingly, the applicant has committed to marketing Unit 3 to retailers only up until nine months prior to the practical completion of the unit. If by this date no operators have been found for the unit, marketing would be broadened out to include all other Class C3 sub-categories. This commitment is welcomed and will be secured in the Section 106 Agreement.

185. The applicant has also applied for Unit 2 to be capable of occupation by community uses, not just flexible commercial uses, which again is in response to the community feedback.





Image 37 *(above): View of the South Building, as seen looking south along Ilderton Road, with Units 2 and 3 edged in red.* ***Image 38*** *(above right) View of*

the North Building, as seen looking north along Ilderton Road, with Unit 1 edged in red.

186. Although Policy P35 requires proposed retail uses in opportunity areas to be conditioned to prevent changes of use within Class E, it would be unreasonable in this instance to restrict the use of the units to the Class E[a], E[b] and E[c] classifications. This is because there is no express requirement within policy for redevelopment of the 79-161 Ilderton Road site to provide retail; the draft AAP simply supports retail uses, and the Southwark Plan says that redevelopment "may" provide such uses. Therefore, the applicant is under no obligation to propose any retail/service/dining uses, and has suggested the units could be tenanted for such purposes only in recognition of the keenness expressed by the community to see a convenience store delivered on the site.

187. As the extant permission —which included 946 square metres of floorspace for commercial, employment and business uses— is a material consideration in the determination of 24/AP/3687, it is necessary to consider the lesser quantum the new proposal would deliver. While it must be acknowledged that the provision would not deliver the same employment-generating potential as the consented scheme, the 24/AP/3687 proposal would nevertheless deliver a quantum proportionate to the overall scale of development and in keeping with the site's location outside of a town or local centre. The intentional configuration of the spaces to attract the type of operator the existing local community wants, with a commitment to market Unit 3 to appeal to such operators, is also positive.

188. For all of the reasons given above, the proposed delivery of 396 square metres GIA of commercial (retail/service/dining/office and community) use on this site is considered acceptable.

Prohibiting inappropriate uses

189. As explained in an earlier part of this report, the site is in the Hot Food Takeaway Exclusion Zone. For the avoidance of doubt in case of any future changes to the Use Class Order and/or prior notification routes, a planning obligation is recommended precluding the occupation of any of the three units for hot food preparation purposes. This is in the interests of environmental protection and visual amenity.

190. For the avoidance of doubt in case of any future changes to the Use Class Order and/or prior notification routes, a planning obligation is recommended precluding change of use of any of the three commercial units to a betting shop, pawnbroker or pay day loan shop. This would be in the spirit of Southwark Plan Policy P40, which does not permit betting shops, pawnbrokers and pay day loan shops in locations outside protected shopping frontages. This is in the interests of promoting healthy lifestyles and reducing societal inequalities.

Job creation

191. The previous lorry park use supported a low level of employment at five full time equivalent (FTE) jobs in total.

192. The proposed 396 square metres of floorspace would support between 20 and 26 FTE positions, depending on the particular type of commercial use for which the units are ultimately used. The provision of up to 26 FTE positions would satisfy the aims of the London Plan and the Southwark Plan in creating new jobs within the Opportunity Area.

Affordable workspace

193. The total quantum of proposed employment-generating floorspace within the development is under 500 square metres GIA. Under the terms of Policy P30 of the Southwark Plan, such a quantum of employment-generating floorspace triggers no affordable workspace.

Conclusion on uses

194. The proposed land uses are appropriate in policy terms for this site within the Old Kent Road Opportunity Area. The introduction of PBCL and conventional housing is considered to be a major benefit of the scheme, facilitating housing delivery benefits including a significant contribution towards affordable housing in the form of 186 social rent units.

195. The proposals for flexible commercial Class E floorspace would revitalise a vacant site that currently fails to activate Ilderton Road, while also contributing to the vibrancy and economy of the Opportunity Area. Although out-of-centre commercial uses are generally discouraged by the London and Southwark Plans, the inclusion of relatively small-scale commercial and community uses is broadly consistent with the wider site allocation in the Southwark Plan and would contribute towards meeting the general aspirations for the Old Kent Road area, as set out in the draft AAP. Moreover, it is not anticipated that the commercial units would harm the vitality and/or viability of the nearest town centres. As such, the three units (two for flexible commercial use, one for flexible commercial/community use) are supported in policy terms.

Affordable housing and development viability

196. The proposed development takes a hybrid approach whereby the PBCL units, all of which would be market rent tenure, would be delivered alongside conventional on-site affordable housing. A total of 186 conventional dwellings are proposed, all of which would be in social rent.

Policy background

197. National, regional and local planning policies place a high priority on the delivery of affordable housing as part of the plan led approach to addressing the housing crisis. Southwark's Strategic Housing Market Assessment (SHMA) identifies a need for 2,077 social rent and intermediate homes per annum which is approximately 71% of Southwark's total housing need. The SHMA suggests

that approximately 78% of the total affordable housing need is for intermediate housing to meet the housing needs of lower and middle income residents. However, the most acute need is for social rent housing to meet the needs of homeless households living in unsuitable temporary accommodation such as bed and breakfasts or overcrowded conditions.

198. The regional policies relating to affordable housing are set out in the London Plan 2021, with the three key policies being H4, H5 and H6. These should be applied having regard to the Mayor's 'Housing' and 'Affordable Housing and Viability' SPGs.

199. Policy H4 requires development to deliver the maximum reasonable amount of affordable housing, with the Mayor setting a strategic target of 50%. The Policy promotes the delivery of those affordable homes on-site, with a cash in lieu contribution permitted only in exceptional circumstances. Policy H4 details the quantum of affordable housing proposals must provide in order to qualify for the "Fast Track" route, whereby a detailed viability assessment will not be required at planning application stage but the permission will be subject to review mechanisms if development is not commenced within two years.

200. At the local level, the Southwark Plan also includes a Fast Track route, albeit setting a higher bar to pass than the Mayor. It states that a detailed interrogation of viability will be waived only where a development provides 40% affordable housing in a policy compliant tenure mix (i.e. a minimum of 25% social rent and a minimum of 10% intermediate housing), with no grant subsidy for the first 20% of homes (which should be delivered as affordable without grant). The 40% Fast Track threshold is calculated on a habitable room basis.

Assessment

201. As already explained in the 'Principle of the proposed development in terms of land use' section of this report, PBCL developments must contribute to affordable housing. However, because PBCL is a non self-contained housing product that does not meet dwelling space standards, the contribution it makes to affordable housing must be in the form of:

- on-site conventional (Class C3) affordable housing; or
- a payment in-lieu towards off-site conventional (Class C3) affordable housing; or
- a combination of the two.

202. Where PBCL uses are proposed, an approach to the Fast Track Route threshold calculation must be taken that is equitable with a fully conventional housing scheme. The metric employed must account for PBCL studios being larger than an average habitable room. The risk of doing otherwise is that, because the PBCL forms the 'market sale' component of the housing offer, the role it plays as a proportion of the total on-site housing could be under-represented, potentially resulting in a failure to secure the maximum viable contribution to affordable housing.

203. The Council accepts a methodology of treating each PBCL unit as one habitable room subject to the wider PBCL premises providing adequate communal facilities and none of the communal facilities contributing to the habitable room count.

204. The table below summarises the composition of the proposal using the 'habitable room' approach accepted by the Council:

Housing composition by habitable room: Summary table			
Land use	**Sub-type**	**Total no. hab rooms (/hab room equivalent)**	**As % of total hab rooms**
Conventional housing (Class C3)	Social rent dwellings	577	**40.0%**
PBCL (Sui Generis)	Studios	865	**60.0%**
	Ancillary facilities	Treated as zero	N/A
Total:		1,442	100%

205. For this privately-owned site, the affordable housing offer meets the Fast Track Threshold of 40%, thus negating the need for any interrogation of viability.

206. The applicant wishes to delay the trigger date for the Early Stage Review by 6 months; as such, the trigger date will be 30 months from the grant of planning permission. This short period of additional time has been requested by the developer to account for the significant delays current affecting the processing time of applications to the Building Safety Regulator. This is a short- to medium-term issues affecting the Regulator. For this reason, and in spite of the Mayor's draft LPG advising that the window should fixed at 24 months, in this instance the 30 month period is considered acceptable.

207. In accordance with the requirements of London Plan Policy H5 and Southwark Plan Policy P1, the Section 106 Agreement will incorporate: an implementation-dependent Early Stage Review (set at 30 months); clauses to ensure delivery of the conventional housing in a manner that keeps pace with the delivery of the PBCL; and provisions around the qualifying criteria for the affordable housing products. With these secured, the proposal is considered to be compliant with all affordable housing policies at local and London levels.

Tenure mix

Policy background

208. Policy H6 of the London Plan prescribes the tenure split of affordable housing. It requires:

- at least 30% to be low-cost rent (social rent or London Affordable Rent);

- at least 30% to be intermediate (with London Living Rent and shared ownership being the default tenures); and
- the remaining 40% to be determined by the borough as low-cost rented homes or intermediate tenure(s) based on identified local need.

209. Policy P1 of the Southwark Plan sets a requirement for a minimum of 25% of all the housing to be provided as social rent and a minimum of 10% intermediate housing to be provided. As a proportion of all the affordable habitable rooms in the development, this equates to 71% social rent equivalent tenures and 29% intermediate tenures. Policy P1 requires any rooms that are over 28 square metres to be counted as two habitable rooms for the purposes of calculating affordable housing. This accounts for large open-plan living spaces that include kitchens and dining areas.

210. As discussed in an earlier part of this report, the PBCL element of the proposal is entirely market sale and would cross-subsidise the delivery of the affordable housing component of the proposed development. The PBCL contains 865 of the 1,442 habitable rooms in the development. Applying the tenure split requirements of Southwark Plan Policy P1, of the remaining 577 habitable rooms:

- at least 361 should be in social rent tenure (i.e. 25% of 1,442);
- at least 144 should be in an intermediate tenure (i.e. 10% of 1,023); and
- the other 72 habitable rooms can be either social rent or intermediate.

211. In December 2024, the Mayor published a Practice Note entitled ‘Accelerating Housing Delivery’ in recognition of the short-term challenges facing housing delivery in London. The Practice Note provides support for residential developments that propose either:

- the social rent element at greater than 25% of the total and the intermediate element at less than 10% of the total, as long as the combined total still meets the minimum overall level of affordable housing necessary to meet the Fast Track threshold; or
- the entirety of the affordable housing as social rent with zero intermediate housing, as long as the social rent offer still meets the minimum overall level of affordable housing necessary to meet the Fast Track threshold.

212. The Practice Note is a material consideration for the purposes of determining planning applications. Local planning authorities and applicants are strongly encouraged to implement the approaches it sets out, even where the relevant local plan was adopted more recently than the London Plan.

213. Applying the Practice Note to the proposed 79-161 Ilderton Road development, it would be acceptable for the applicant to propose more than 361 social rent habitable rooms (with a concurrent one-for-one reduction in the number of intermediate habitable rooms), as long as the total number of affordable habitable rooms proposed remains at the Fast Track minimum threshold of 577.

Assessment

214. The proposed development would provide 577 affordable Class C3 habitable rooms, all of which would be in social rent. This affordable housing offer complies with the Mayor's 2024 'Accelerating Housing Delivery' Practice Note and exceeds the minimum proportion of social rent required by the Southwark Plan.

215. While no element of intermediate housing is proposed, this is acceptable given the acute need for social housing in the borough and across the wider metropolitan region. The willingness of Registered Providers to take on new intermediate housing stock has been dampening in recent years; this lack of appetite is likely to be temporary, but unless the policy requirement for 10% intermediate is applied flexibly it risks slowing overall delivery of housing in the short-term. Short-term prioritisation of social rent would not harm the balance of tenures overall locally, as there is a strong supply of intermediate housing in the Old Kent Road area at present. In light of these considerations, the offer of all 577 affordable habitable rooms as social rent should be supported.

216. With 40% affordable housing provided overall, the proposal qualifies as a Fast Track application under the Mayoral and Southwark criteria, and in the context of the Mayor's 'Accelerating Housing Delivery' Practice Note 2024.

Dwelling size mix

Policy background

217. With regard to dwelling size mix, the principles set out by London Plan Policy H10 are made locally specific by Southwark Plan Policy P2. The latter states that major residential developments must provide a minimum of 60% of residential units with two or more bedrooms, and that within the OKR Action Area Core 20% of residential units must have three or more bedrooms. The policy also states that studios (i.e. dwellings for occupancy by one person, which do not have a sleeping area segregated from the rest of the living accommodation) should not constitute any more than 5% of the total housing, and that studios should only be provided in open market tenure. Dwelling mix compliance is assessed on the basis of dwelling numbers, not habitable rooms.

Assessment

218. The table below summarises the split of sizes/occupancies, by dwelling numbers, across the 186 proposed conventional (Class C3) social rent dwellings is:

Distribution of homes by dwelling size/occupancy: Summary table			
Unit size	**Building C**	**Building D**	**Total (both buildings)**
1-bed	31 (16.7% of all)	46 (24.7% of all)	77 (41.4% of all)

2-bed	44 (23.7% of all)	35 (18.8% of all)	79 (42.5% of all)
3-bed	30 (16.1% of all)	0	30 (16.1% of all)
All units	105 (56.5% of all)	81 (43.5% of all)	186 (100%)

219. Although the number of one-bedroom units would exceed the policy maximum of 40%, and the number of homes with three bedrooms would fall short of the policy minimum of 20%, in both cases the margin of non-compliance is small. While Policy P2 expects the distribution of occupancies to be calculated by number of dwellings, it should nevertheless be noted that if the metric used was habitable rooms rather than dwelling numbers, the total number of one-bedroom units within the scheme would be comfortably within the 40% maximum expectation and the three bedroom units would significantly exceed the 20% minimum expectation. This can be seen in the right-hand column of the below table

Distribution of habitable rooms by dwelling size/occupancy: Summary table			
Unit size	**Building C**	**Building B**	**Total (both buildings)**
1-bed	62 (10.7% of all hr)	102 (17.7% of all hr)	164 (28.4%)
2-bed	132 (22.9% of all hr)	131 (22.7% of all hr	263 (45.6%)
3-bed	150 (26.0% of all hr)	0	150 (26.0%)
All units	344 (59.6% of all hr)	233 (40.4% of all hr)	577 (100%)

220. While it must nevertheless be recognised that the unit mix is not technically compliant, this should be weighed in the balance against:

- the delivery of 186 new high quality social rent homes (which would make a major contribution to easing the acute social housing need in the borough); and
- 109 of the proposed homes containing two or more bedrooms, which would help considerably to reduce the number of local families on the waiting list.

221. It is considered that the two aforementioned factors weigh much more strongly in favour of granting permission.

Quality of residential accommodation – PBCL

Policy background

222. As mentioned in an earlier part of this report, Policy H16 of the London Plan sets out various criteria that PBCL must meet in order to achieve policy compliance. This includes Criterion 6, under which there are six sub-criteria relating to standard of accommodation. The earlier part of this report

summarised that the quality of accommodation would be exemplary, referring readers to this 'Quality of residential accommodation' section for the full detailed assessment.

223. To supplement and expand on the quality of accommodation requirements set out under Criterion 6 of Policy H16, the Mayor has published a LPG setting out quantitative and qualitative design standards in relation to PBCL. Bringing together the standards from Policy H16 with those in the LPG, there are eight key matters against which to assess the communal facilities within the proposed accommodation. These are:

- Would there be convenient access to communal kitchens?
- Would internal communal amenity space (dining rooms, lounges etc.) be provided?
- Would sufficient laundry and drying facilities be provided?
- Would workspace be provided?
- Would there be toilets and storage in the communal areas?
- Would the premises be served by a concierge?
- Would outside communal amenity space be provided?

224. The quality of the accommodation also depends on its management, which is another matter covered in detail in the Large-scale Purpose-built Shared Living LPG. It sets out that the management plan must cover the following:

- security and fire safety procedures;
- maintenance of all internal and external communal areas;
- provision of bedding/linen changing and room cleaning services;
- move-in and move-out arrangements;
- servicing and delivery arrangements;
- details of the tenant contract strategy; and
- details of the management, including transferral arrangement in the event of future management changes.

225. A final consideration is the quality of the individual studios. Aside from some general requirements relating to the fit-out and square meterage, the LPG states that studios should be designed "to receive adequate levels of daylight, sunlight, ventilation, outlook and privacy, and must be protected from internal and external sources of noise, to ensure good-quality living conditions". It also expects the PBCL to meet the requirements of London Plan Policy D5, which relates to wheelchair housing.

226. The following paragraphs provide a full assessment of the communal facilities, the management plan and the individual units.

Assessment of communal facilities

Would there be convenient access to communal kitchens?

227. Communal cooking facilities would be provided at Level 01 and Level 28 of Block A, and at Level 01 and Level 22 of Block B. These kitchens would be available to all residents within each block, irrespective of the floor their studio is located on.

228. For those studios located on levels without communal kitchen facilities, access would be possible via one of the six proposed residents' lift. The waiting-plus-travelling time for those living on the floor farthest from a communal kitchen would on average be 21 seconds.

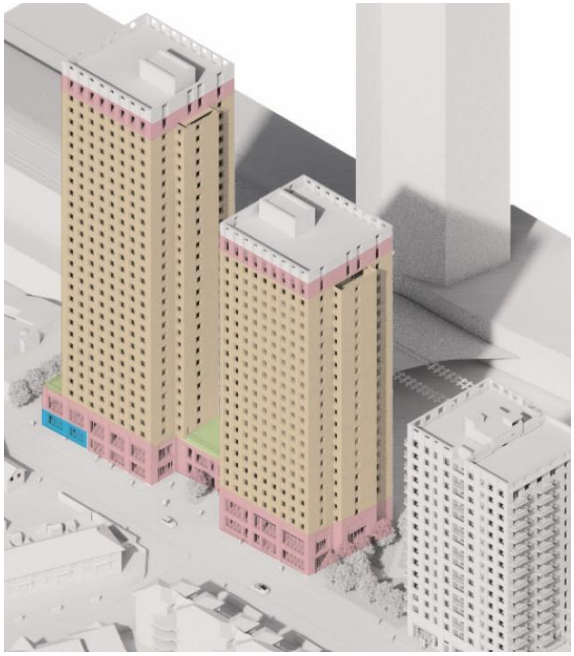


Image 39 *(above): Distribution of the communal facilities, denoted in pink and green, across Blocks A and B.*

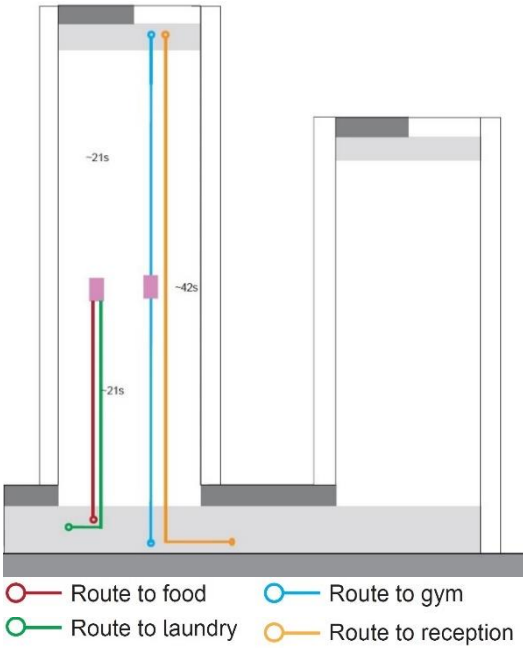


Image 40 *(above): Maximum travel time from the storey of accomodation farthest from communal facilities.*

229. Another consideration in terms of 'convenience' is the level to which the kitchens are equipped with food preparation appliances relative to the number of residents. In the case of the proposed PBCL, all the communal cooking facilities would meet the 'good practice' criteria set out in the Mayor's LPG, namely:

- a minimum of 0.5 square metres per resident, to include one cooking station for every 15 residents;
- a sink and draining board for every 15 residents;
- at least one fridge with freezer in every kitchen;
- at least one dishwasher in every kitchen;
- at least one microwave in every kitchen;
- at least one refuse space (to include recycling capability) in every kitchen.

230. Having regard to the appropriateness of this site for tall buildings with compact and efficient floorplates, it is considered that the proposal would provide convenient access for all residents to communal cooking facilities.

Would internal communal amenity space (dining rooms, lounges etc.) be provided?

231. The proposed communal kitchens would include dining tables each capable of seating multiple people, allowing residents to cook, eat and converse in the same space. Dedicated private dining rooms would be also be provided, thereby giving those who wish to eat separately from the food preparation area the option to do so. Some would be bookable by residents to host dinner parties and/or share a large meal. In summary, the PBCL would provide residents with a wide range of dining spaces.

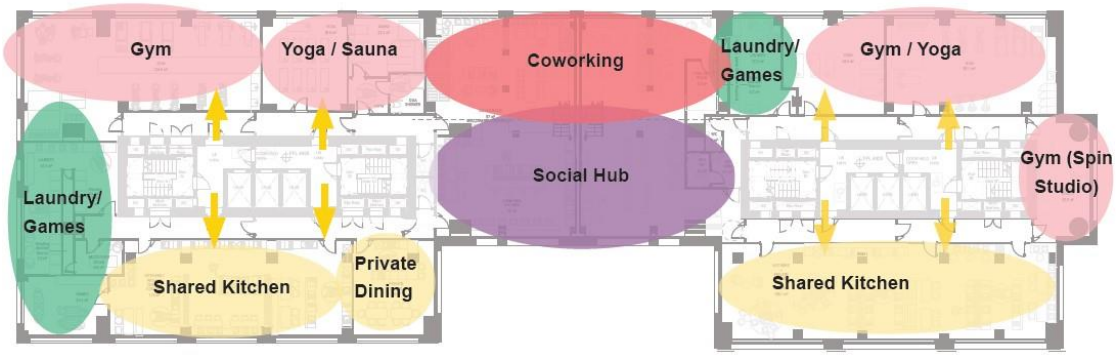


Image 41 *(above): The Level 01 floorplan, showing the two food preparation areas and the availability of dining areas within the kitchens themselves (in yellow) as well as within the central social hub (purple).*

232. In addition to dining areas, the proposal would incorporate a number of communal lounge spaces and games rooms; these would provide residents with recreation and relaxation opportunities away from their private studio. Some of the lounge and games rooms would be located on the uppermost storeys of Blocks A and B, providing impressive spaces for socialising and entertaining. Other facilities would include a cinema and a gym.




Images 42 and 43 *(above, left to right): Precedent images supplied by the applicant, giving an impression of the 'look and feel' of the kitchen and dining space in the PBCL.*

233. The LPG also places importance on recreational spaces being designed to optimise flexibility. A number of rooms in each block are to be fitted with free

standing furniture and adequate plug sockets; this could enable day-time use for meetings or group work, before returning to general recreational use later in the day. Subject to demand and take up, some of the quiet facilities could be repurposed as prayer rooms depending on the resident make-up of the development, which is in accordance with the recommendations of the LPG.

234. Throughout the building, incidental seating would also be provided to create an environment in which visitors can comfortably linger and impromptu interactions can occur between residents. This is in line with the recommendations of the LPG.

Would sufficient laundry and drying facilities be provided?

235. The proposed plans indicate that the two communal residents' laundrette –one on Level 01 of Block A and the other on Level 01 of Block B– would each provide 40 washer/dryers. The generous size of each of the laundrettes means air drying on racks would be possible.

236. The LPG advises that 1 washer and dryer should be provided for every 35 residents; the proposed development would exceed this target, with Block A providing one for every 20 residents and Block B providing one for every 10 residents. To enable ease of use of these facilities, the Operational Management Plan suggests an app will be set up to enable residents to book washer/dryer slots.

Would workspace be provided?

237. Over 300 square metres of co-working space is proposed, all equipped with charging points, high speed broadband and height-adjustable desks. The co-working space would be for the exclusive use of PBCL residents with no charges on top of the residents' monthly rental fee.

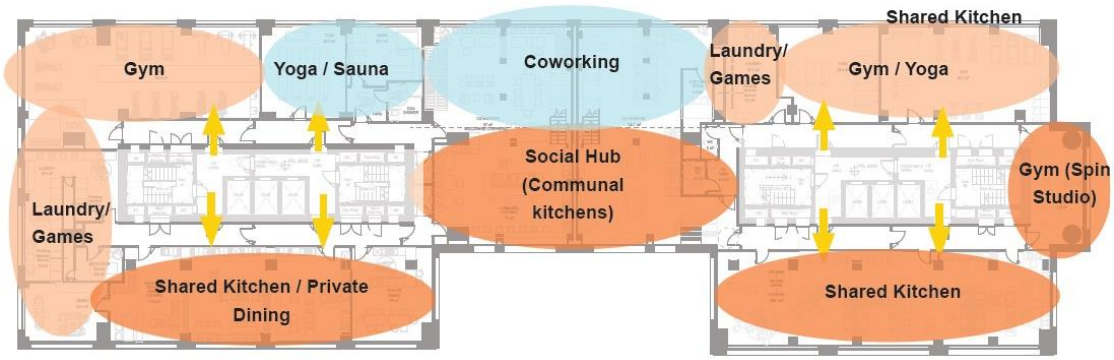


Image 44 *(above): Floorplan of Level 01 of the proposed PBCL, with co-working areas highlighted in blue.*

Would there be toilets and storage in the communal areas?

238. Convenient toilet facilities would be provided alongside other communal facilities for use by residents' guests. These WC clusters would be located on

the first floors and rooftop floors of each block, accessed off the communal recreational areas.

Would the premises be served by a concierge?

239. The General Manager will be on site during the day and early evening with security covering out of hours so that the site is manned 24/7. The General Manager will primarily work from their dedicated office, located adjacent to the reception and gate line on the ground floor level of the PBCL premises. This will provide an 'in effect' concierge service.

Would outside communal amenity space be provided?

240. The proposal would provide the following outside communal amenity spaces for exclusive use by the PBCL residents:

- For Block A: a courtyard garden at ground floor level, a small terrace at Level 02 on the north side of the block, and a terrace at Level 02 on the south side of the block;
- For Block B: a courtyard garden at ground floor level, a portion of the Pocket Park, and a terrace at Level 02 on the north side of the block.



***Image 45** (above): Layout of Level 02 of the North Building (spliced to omit a portion of the internal floorspace), showing the two podium-level spaces serving Block A on the left hand side and at the centre of the image, and the one podium-level space serving Block B on the right hand side.*

241. In total, the proposed outdoor amenity space would comprise 428.0 square metres for the residents of Block A and 414.0 square metres for the residents

of Block B. With the 'provision per resident' benchmarks recommended by the LPG having been exceeded, this quantum is considered to be adequate.

242. All of the proposed outdoor spaces would be well-designed and multifunctional, providing lounge/relaxation, dining and work opportunities. Residents would be able to use the spaces for group-based and solo recreation. Therefore, in qualitative terms, the spaces are considered acceptable.

243. A final consideration in respect of communal amenity space is whether the configuration would achieve good levels of sunlight penetration. The DSO report submitted with the application demonstrates that, in the current-day context, three of the four external amenity and play areas would receive in excess of the BRE recommended levels of sunlight (50% for 2 hours of the day when measured on the Equinox). The one communal external amenity space that would not achieve the BRE recommendations is the northern terrace at Block A. By reason of its positioning at podium level, together with its location on the northern side of Block A resulting in an obstruction to the sun path for a sizeable portion of the day, more limited sun-on-ground exposure in this part of the site is inevitable. Importantly, however, the residents of this block would be able to access the podium-level external amenity area to the south (which is larger in size than the northern terrace, and where the sun-on-ground exposure would meet the BRE guidelines). Therefore, the outdoor amenity space available to residents of Block A would, when taken as a whole, offer an acceptable level of amenity.

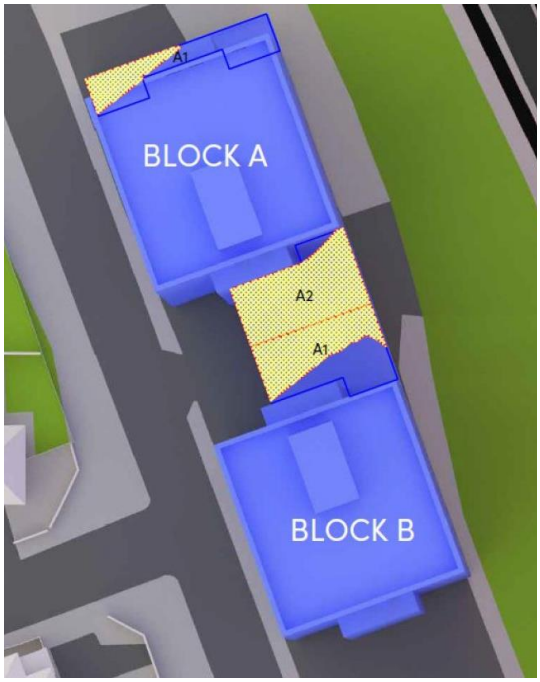


Image 46 *(above): Sun-on-ground analysis in the proposed scenario for the North Building (the areas in yellow would achieve at least 2 hours of coverage on the Equinox).*

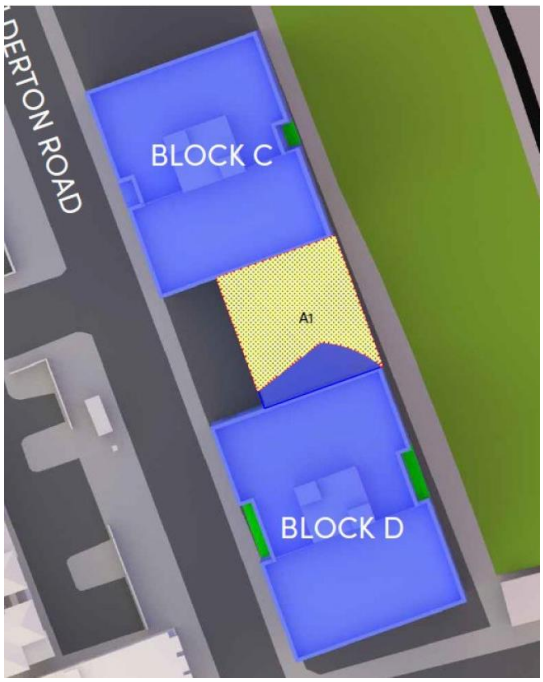


Image 47 *(above): Sun-on-ground analysis in the proposed scenario for the podium at the South Building (the area in yellow would achieve at least 2 hours of coverage on the Equinox).*

Summary

244. The proposed communal facilities would be inclusive, well designed, adequately sized, conveniently accessed, and sufficient to meet the requirements of the intended number of residents. They would provide a range of lively and quiet environments, offering opportunities for solo use while also helping develop a sense of community. This is all in accordance with the aims of the LPG.

Assessment of management arrangements

245. With the exception of move-in/move-out arrangements and deliveries/servicing (which are discussed in the 'Transport and Highways' section of this report), the following paragraphs assess the Operational Management Plan for compliance with the LPG requirements.

Security and fire safety procedures

246. With regard to security procedures, the Operational Management Plan includes commitments to 24-hour on-site security at the property, comprehensive CCTV coverage, and electronic 'access control' lock systems throughout.

247. The Fire Safety Statement submitted in support of the application details the safeguarding of external and internal communal spaces and safety measures for private units and communal spaces. It confirms that the owner/operator of the PBCL will be responsible for implementing a management plan for the ongoing maintenance of fire safety systems and ensuring safe access routes to and within the buildings.

Maintenance of all internal and external communal areas

248. The Operational Management Plan commits to regular maintenance and cleaning of the internal communal spaces across the week. A specific commitment is made to maintain the communal kitchens on a daily basis. Management and cleaning procedures will ensure cooking facilities can be made available for faith-based groups, allergies, and dietary preferences to limit cross-contamination risks.

249. With regard to external communal areas these will be kept clean and tidy, safe and free from hazards by the General Manager and cleaning staff.

Provision of bedding/linen changing and room cleaning services

250. The Operational Management Plan confirms that bedding and linen would be supplied to new residents on occupation. Ad hoc at-cost room cleaning services are to be available to residents, bookable via an app.

Details of the tenant contract strategy

251. The monthly fee charged to the PBCL residents would be all-inclusive, encompassing all of the internal and external amenity spaces, including facilities and services (with the exception of laundry). This meets the requirements of the LPG, which expects all services and facilities to be included in the rent, except utility bills for individual studios.

Details of the management, including transferral arrangements in the event of future management changes

252. The Operational Management Plan states that, in the event of any future changes to management, the departing operator will use all reasonable endeavours to minimise disruption to residents, maintaining close communication with the incoming operator to ensure they are fully informed about all aspects of the scheme. This recognition of the need to minimise impacts on residents is welcomed.

253. All other aspects of the PBCL management have been detailed in the preceding paragraphs, and are considered to be acceptable.

Summary

254. The Operational Management Plan outlines adequately how tenants would be provided with a good level service on a day-to-day basis as part of their 'all inclusive' monthly rent. It also provides the necessary assurances in respect of the current and long-term management of the PBCL, as well as fire safety and security arrangements. This is all in accordance with the aims of the LPG.

Assessment of individual studios

Spatial arrangement

255. Each PBCL studio would be fully furnished with an en-suite shower room. There are seven different studio typologies, provided in the composition set out below:

PBCL individual studios: Summary table				
Unit type	**GIA (sq.m)**	**Wheelchair accessible?**	**Total number (as %)**	**Total number (as %)**
Studio 01a	19.5	No	300 (34.68%)	776 (89.71%)
Studio 01b	18.8	No	12 (1.39%)	
Studio 02	21.5	No	104 (12.02%)	
Studio 04a	18.2	No	80 (9.25%)	
Studio 04b	19.0	No	280 (32.37%)	
UA Unit 01	35.2	No	3 (0.3%)	89 (10.29%)
UA Unit 01	35.2	Yes	47 (5.4%)	

UA Unit 02	28.1	Yes	39 (4.51%)	
Total			865	

256. The LPG states that, with the exception of wheelchair accessible units, studios should be no smaller than 18 square metres and no larger than 27 square metres to avoid being converted to substandard self-contained units. Types 01a, 01b, 02, 04a and 04b would all fall within this floorspace range, and as such are acceptably-sized.

257. Taking the smallest of the studio typologies, the following accommodation would be provided:

- a double bed with storage underneath;
- a compact kitchenette including a fridge, oven and hob with in-built extract and ventilation system;
- wardrobe space (typically in excess of 0.8 metre width);
- approximately 2.5 square metres of storage space;
- a seating area for eating and working;
- an area to relax, comprising soft seating located in the brightest part of the room;
- wall and cupboard storage; and
- an en-suite shower room.





Images 48 and 49 *(above, left to right): Annotated axonometric and precedent photograph of a 01 Studio type, showing the general layout as well as the typical quality of furnishings and fittings.*

258. The other studio typologies would offer the same extent of furniture and fittings, but in many cases to a more generous level.

259. The detailed floorplans for each studio typology demonstrate that the furniture would be accommodated in a way that would not make the homes cramped or impractical for use. All PBCL studios would achieve 2.5 metre floor-to-ceiling

heights throughout the lounge, kitchen and sleeping area, which would help guard against a cramped or claustrophobic living environment

260. In summary, it is considered that the studios would be appropriately sized and thoughtfully laid-out.

Environmental comfort

261. Each PBCL studio would incorporate at least one window with an openable pane, with the glazing size and specification optimised to maximise natural daylight within the units. The openable pane would allow for a degree of manually-controlled passive ventilation and thermal control. Comfort cooling would be available in the studios to complement the natural ventilation.

262. A Noise and Vibration Impact Assessment accompanies the application, which outlines the façade and ventilation strategy. The background noise in this location is such that in the predicted worst case conditions (i.e. when noise emanating from Ilderton Road is at its highest), residents would need to close their windows to maintain an internal noise environment that does not exceed the target levels set out in Building Standards. At less noisy times of the day residents would be able to open their windows without their internal environment target noise levels being exceeded.

263. On balance, it is considered that an acceptable level of amenity would be secured for the PBCL occupiers. A subsequent section of this report entitled ‘Energy and Sustainability’ deals in more detail with the environmental strategy for the accommodation.

Outlook, sense of openness and privacy

264. Outlook, sense of openness and privacy are all very important considerations for PBCL proposals. This is because —unlike conventional housing which provides occupiers with multiple rooms and a variety of outlook— PBCL residents are likely to spend the majority of their time in their studios, notwithstanding that PBCL premises include communal spaces. Given this, separation distances and depth of view from PBCL studios are important.

265. The typical floorplate would be arranged symmetrically, with a central service zone including the vertical circulation. This configuration allows a significant proportion of the 865 units to have an east or west aspect. The only exceptions would be 25 north-facing single aspect units within Block A and 19 north-facing single aspect units within Block B. While the more compromised amenity of these units must be recognised, the homes would enjoy neighbourly separation distances and an outlook either down onto the landscaped podium or towards the City. When considering the north-facing single aspect units constitute only 5% of the total PBCL accommodation, this level of compliance is deemed acceptable.

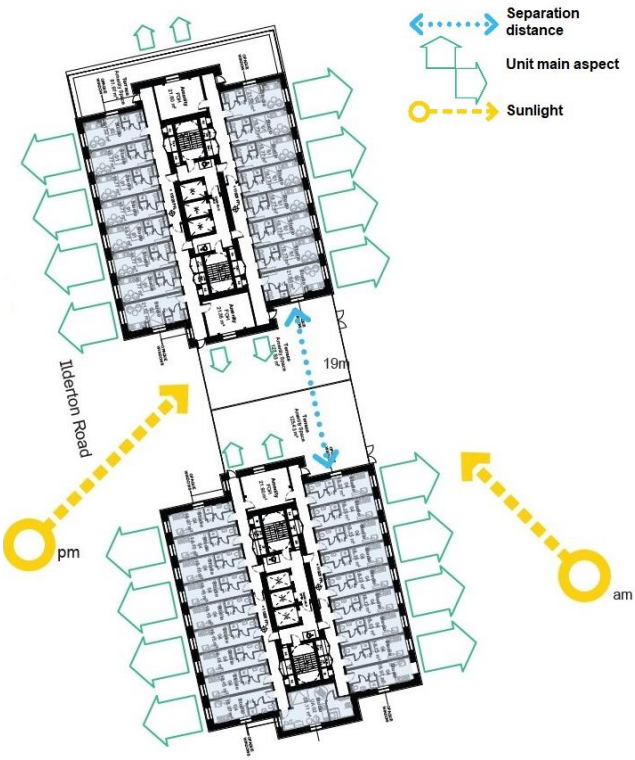


***Image 50** (above): Layout of Level 02 of the North Building, showing that the majority of the units would face either east or west.*

266. The closest neighbouring property to any of the proposed PBCL studios is Mehmet's Tyre Shop at 59 Ilderton Road, which adjoins the application site to the north. The windowless south flank of the Tyre Shop would be 10.5 metres away from the closest studio. However, the modest one-and-a-half storey height of this neighbouring building means the PBCL occupiers would benefit from views 'over' the Tyre Shop rather than towards the flank wall, thereby achieving a reasonable quality of outlook. It is also a material consideration that the extant planning permission, 23/AP/0387, incorporated residential units facing towards Mehmet's Tyre Shop at a closer proximity of 7.7 metres. The quality of outlook from all other PBCL studios would be good.

267. Due to the separation distances and mitigating factors for the units in greatest proximity to neighbouring buildings, in the current day context all proposed studios would benefit from good levels of privacy.

Wheelchair studios

268. To meet the requirements of London Plan Policy D5 and ensure inclusive design, PBCL schemes should provide 10% of the studios to the M4(3) standards established by Approved Document M of the Building Regulations. Unlike with conventional housing, PBCL studios do not need to meet either of the sub-categories (i.e. M4[3][2][a] or M[4][3][2[b]); however, as per the Mayor's LPG, the homes should be between 28 and 37 square metres in area

and the layouts should provide a good range of amenities. The LPG does permit wheelchair studios under 28 square metres, but only where:

- drawings demonstrate how the rooms have been designed in accordance with Part M of the building regulations;
- they provide adequate space and wheelchair accessibility; and
- the design has been approved by an inclusive accessibility expert..

269. The proposed development would provide 86 wheelchair accessible studios, equating to 10% of the total number. These studios would be distributed across various different floors of the development, and their configuration would conform with the guidance given in the LPG. With Section 106 obligations in place to secure the wheelchair user accommodation and marketing requirements, it is considered that the proposal complies with London Plan Policy D5.

Conclusion on quality of PBCL accommodation

270. In conclusion, the proposal would achieve high quality living accommodation for the PBCL residents. Well laid out and adequately-sized studios are proposed, alongside good-sized shared facilities equipped to meet the needs of the total number of residents. Good outlook would be achieved throughout. A robust framework Operational Management Plan has been submitted by the applicant, a finalised version of which is to be secured by way of a planning condition. In light of all of the above, the relevant policies of the London Plan and Southwark Plan have been met.

Quality of residential accommodation – Conventional housing

Policy background

271. Adopting a design-led approach, Policy D6 of the London Plan 2021 sets out the quantitative and qualitative requirements of new residential accommodation. Quantitative metrics include the minimum size of dwellings, rooms and outdoor spaces. Qualitatively, the policy seeks to maximise dual aspect and naturally-lit layouts, make tenures imperceptible from each other, and ensure robust maintenance and management strategies are in place.

272. Policy P15 of the Southwark Plan 2022 advises that planning permission will be granted provided the proposal achieves a high standard of residential accommodation. The full range of local-level standards for internal accommodation are set out in the Council's Residential Design Standards SPD.

Assessment

Tenure integration

273. London Plan Policy D6 requires housing developments to maximise tenure integration in the interests of achieving mixed communities. It states that all affordable housing units should have the same external appearance as private housing, and that all entrances should be indistinguishable from each other. Policy SP2 of the Southwark Plan 2022 echoes these objectives, requiring residential schemes to achieve equity of esteem from street level and avoid segregation of tenures.

274. The 186 conventional residential units in the proposal would be entirely social rent, and would be contained within the South Building, separated from the exclusively-PBCL North Building by the Pocket Park.



***Image 51** (above): Main entrance of the South Building, set behind a centralised feature tree.*



***Image 52** (above): Upper floors of the South Building*

275. Despite the two housing typologies being physically separate, the external appearance of the North and South Building would be of a consistent standard, and the lobbies would be of an equally high quality. This would ensure equity of esteem from street level. In addition, the Pocket Park –a high quality public landscaped space– would help to foster integration between all of the residents irrespective of the tenure of their home.

Dwelling sizes, room sizes and provision of built-in storage

276. With the except for the 'Wheelchair User' dwellings (as discussed in a subsequent part of this report), all of the proposed homes would achieve the minimum GIAs set out in the Council's Residential Design Standards SPD. All 186 dwellings would be logical and efficient in their layout, with practically-shaped rooms and minimised circulation space. Additionally, compliant levels of built-in storage would be provided within the homes.



Image 53 *(above): Layout of Level 05 of the South Building, showing the range of home sizes that would be provided and their layouts. Three-bedroom homes are shown in blue, two-bedroom homes in shades of orange and one-bedroom homes in shades of yellow.*

277. It must be noted there would be a total of 60 living/kitchen/dining spaces within the development (all in the non-wheelchair dwellings) that would fall short of the minimum square meterage required by the SPD. However, the shortfalls are relatively small in all instances and none of the shortfalls would result in awkwardly-shaped or cramped living/kitchen/dining spaces. As such, and while this policy non-compliance must be acknowledged, it is considered that a good quality of residential accommodation would nevertheless be provided across all 186 homes.

278. In summary, the dwelling, room and built-in storage sizes are considered acceptable.

Wheelchair dwellings

279. Under Part 1 of Southwark Plan Policy P8, new build major residential development are expected to:

- provide at least 10% of homes (measured in habitable rooms) to Building Regulation M4[3] 'Wheelchair User' standard; and
- provide the remaining dwellings to Building Regulation M4[2] 'Wheelchair Accessible and Adaptable' standard.

280. Building Regulation M4[3] 'Wheelchair User' dwellings comprises two sub-categories specifying different levels of fit out at the point of occupation:

- M4[3][2][a] 'Wheelchair User, Capable of Adaptation'; and
- M4[3][2][b] 'Wheelchair User, Fully Accessible at Point of Occupation'.

281. In addition to setting a minimum proportion of M4[3] homes across the development, Part 1 of Policy P8 requires that, where the proposal includes any social rented homes, at least 10% of those social rented homes are built out to the M4[3][2][b] 'Wheelchair User, Fully Accessible at Point of Occupation' standards of the Building Regulations.

282. Under Part 2 of Southwark Plan Policy P8, various detailed design requirements of wheelchair housing within new residential development are

specified. This includes a requirement for all two bedroom affordable 'Wheelchair User' homes to have an occupancy of four people.

283. Planning application 24/AP/3687 proposes 18 'Wheelchair User' homes to M4[3][3][2][b] standards. These would be provided across a range of dwelling sizes, and on various floors of the South Building. In total, these 18 homes contain 63 habitable rooms, which constitutes 10.9% of the total number of habitable rooms across the conventional housing as a whole. This accords with Policy P8.



Image 54 *(above): Furnished layout of the proposed one-bed Wheelchair User home, "Unit 1D".*



Image 55 *(above): Furnished layout of the proposed two-bed Wheelchair User home, "Unit 1E".*

284. All of the proposed two-bedroom 'Wheelchair User' homes would have an occupancy of four people, in accordance with the expectations of Part 2 of Policy P8.

285. All of the other 168 dwellings within the proposed development would be designed to achieve the M4[2] 'Wheelchair Accessible and Adaptable' standard, in accordance with the requirements of Part 1 of Policy P8.

286. With the wheelchair accommodation and marketing requirements to be secured through the Section 106 Agreement, the proposed provision is considered to be acceptable.

Floor-to-ceiling height

287. All dwellings would have a floor-to-ceiling height of at least 2.5 metres. This meets the minimum requirements stipulated by London Plan Policy D6 and the Council's Residential Design Standards SPD, which are 2.5 metres and 2.3 metres respectively. This would contribute to the sense of space within all the dwellings.

Aspect and outlook

288. Of the 186 dwellings proposed, 90 (48.4%) would be single aspect and 96 (51.6%) would be dual aspect.

289. Of the 90 single-aspect homes, 30 would be two-bedroom, with the remainder being one-bedroom. None of these single-aspect homes would face within 90 degrees of due north, and the key habitable rooms for each of these flats would have generously proportioned windows to provide occupiers with a broad viewframe. Furthermore, the South Building's floorplate shape means windows would not be flanked by deeply projecting walls, thereby guarding against the occupiers experiencing a tunnelled outlook. Thus, despite the single direction of outward view from these dwellings, the floorplate configuration and orientation of the building means the occupiers would benefit from an acceptable quality of outlook.

290. In summary, the proposal would achieve a predominance of dual aspect, with all proposed dwellings benefitting from an acceptable quality of outlook. Although there would be a number of two-bedroom single-aspect homes, none would be north-facing, and when balanced against the need to achieve an efficient use of land, it is considered that the new dwellings' quality of aspect and outlook would be in accordance with the policy framework.

Internal noise and vibration levels

291. Conditions are recommended requiring pre-occupation testing of the separating floors and walls to demonstrate that the relevant acoustic performance standards, as prescribed by the Building Regulations, have been met. This will ensure that the occupiers of the dwellings do not experience excess noise, transmitted either vertically or horizontally, from adjacent sound sources.

On-site storage facilities for refuse and deliveries

292. The South Building would contain dedicated communal refuse facilities in an appropriate location convenient for the residential occupiers.

293. The South Building would not incorporate any externally accessible rooms for the storing of deliveries and other bulky items. Given that this type of facility would most probably require oversight by a concierge or other on-site management personnel, which in turn would have an inflationary effect on service charges, no such facility is proposed. Therefore, residents would be expected to accept larger deliveries in person and take them directly to the home. Given that good levels of built-in storage have been provided within the dwellings, this is considered acceptable and in line with policy requirements.

Conclusion on quality of conventional residential accommodation

294. The proposal would deliver 186 new homes benefitting from a good quality of outlook, a logical layout and practically-sized rooms, with the majority enjoying dual aspect. The host building would be indistinguishable from the neighbouring North Building in terms of quality of external design, thus

ensuring imperceptibility of tenure. For these reasons, it is considered that the conventional residential accommodation would achieve a high quality of design.

External amenity space and young people's play space

Private external amenity space

295. All new residential development must provide an adequate amount of useable external amenity space. The Council's Residential Design Standards SPD sets out the required amenity space standards, which can take the form of private gardens, balconies, terraces and/or roof gardens. It requires:

- for dwellings containing three or more bedrooms, the provision of 10 square metres of private amenity space;
- for dwellings containing two or fewer bedrooms, the provision of 10 square metres of private amenity space wherever possible, permitting any shortfall to be added to the communal space, and;
- 50 square metres of communal amenity space per development.

296. Where it is not possible to provide the 10 square metres for one- or two-bedroom homes desired by the Council's Residential Design Standards SPD, Policy D6 of the London Plan allows smaller private amenity spaces be counted towards the total provision provided these spaces are at least 1.5 metres deep and no smaller than:

- 5 square metres for 1b1p and 1b2p homes;
- 6 square metres for 2b3p homes; and
- 7 square metres for 2b4p homes.

297. All of the 30 family-sized homes would benefit from private amenity spaces of at least 10 square metres, in accordance with the London Plan and the Council's Residential Design Standards SPD. However, for the remaining 156 proposed dwellings (all of which are one- or two-bedroom homes), it has not been possible to provide 10 square metres of private amenity space. In all of these cases, the private amenity spaces would nevertheless meet the absolute minimum occupancy-linked square metreage and the 1.5 metre minimum depth expected by London Plan Policy D6.

298. In total, the cumulative private amenity space shortfall would be 322.0 square metres at Block C and 292.8 square metres at Block D. The extent to which the cumulative private amenity space shortfall is offset by the proposal communal amenity space is set out in the table below:

Private amenity space shortfall and offset: Summary table				
Block	**Total private amenity shortfall (sq.m)**	**Communal requirement**	**Communal provision (sq.m)**	**Communal provision**

		(shortfall + 50 sq.m)		shortfall / surplus (sq.m)
Block C	322.0	372.0	110.0	Shortfall: -262.0
Block D	292.8	342.8	133.0	Shortfall: -209.8
Summary				
Both blocks	614.8	714.8	243.0	Shortfall: -471.8

299. As explained in the subsequent part of this report, the remaining 471.8 square metre shortfall is to be compensated for via a payment-in-lieu of £96,719 (index linked), based on a tariff of £205 for every square metre shortfall. This approach is permitted by the Council's S106 and CIL SPD. The financial contribution will be used to help improve open space elsewhere near to the development site.

300. In summary, while it should be recognised that the size of some proposed private amenity spaces would be less than 10 square metres, no home would have a balcony any smaller than the absolute minimum occupancy-linked square metreage stipulated in the London Plan. The communal external amenity spaces have been oversized to compensate for some of the cumulative private amenity space shortfall, which is permitted by policy. The impact on the occupiers of homes with a smaller external amenity space has in some instances been mitigated by over-sizing the internal accommodation. Balancing the various factors in the round, the private outdoor amenity space provision is considered to be acceptable.

Communal external amenity space

301. The proposal incorporates a series of raised gardens for the exclusive use of the 186 households; one of these (at podium level) would be given over entirely to a play function, while the other two (on the rooftops) would intertwine communal external space with play facilities. The table below details the size of each garden, including the proportion that would be given over to a communal external amenity space function:

Dedicated external residential (communal amenity and play) facilities: Summary table				
Block	**Location**	**Total area (sq.m)**	**Area designated for communal amenity (sq.m)**	**Area designated for play space (sq.m)**
Blocks C & D	Level 01	289.0	Zero	289.0
Block C	Level 16	260.5	110.0	150.5
Block D	Level 10	304.5	133.0	171.5

Summary				
Both blocks	Levels 01-16	854.0	243.0	611.0

302. A mix of furniture, some fixed and others loose, is proposed in the rooftop gardens to provide opportunities to sit and relax individually or in groups, to work or dine. This furniture will be set amongst flower-rich perennial planting.

303. The format, distribution, locations and quantum of communal amenity space meets the expectations of Policy D6 of the London Plan, when taking into account the External Amenity Space payment-in-lieu to be secured in the Section 106 Agreement. As such, the provision is considered acceptable



***Image 56** (above): North-to-south section through the rooftop garden at Block C, showing how play and communal amenity space would be intertwined.*

304. Planning conditions are recommended requiring details of the finalised scheme of landscaping, treatment and enclosures, and for the facilities to be delivered prior to occupation of any of the dwellings. Unrestricted and equitable access to the communal amenity space on the podium is to be secured for all 186 homes in the Section 106 Agreement.

Young people's play space

305. Policy S4 of the London Plan 2021 requires new developments to make provision for play areas based on the expected child population of the development.

306. In line with the Mayor's Play and Informal Recreation SPG, the total young people's play space requirement for the proposed development is 1,536.1 square metres. Across the three age groups the Mayor expects play space to be designed for, this minimum quantum breaks down as follows:

- 0-4s: 688.3 square metres
- 5-11s: 514.8 square metres
- 12-17s: 333.0 square metres

307. Play facilities and communal external amenity space can be designed to be intertwined, but must be counted as discrete elements (i.e. play space and communal play space cannot be double counted). As set out in the draft AAP, if a development proposes any on-site public open space, this can be counted towards the play space provision and towards the public open space, provided that the public open space is genuinely playable.

308. The applicant proposes to deliver dedicated playable facilities in the following locations:

- on the rooftops of Blocks C and D;
- on the podium in-between Blocks C and D; and
- within the Pocket Park.

309. In total this provision would amount to 1186.0 square metres, falling 350.1 square metres short of the minimum 1,536.1 square metre requirement.

310. The below table explains how the quantum yielded by each block for each age group would be met on-site wherever possible, with the 'Summary' section setting out how an in-lieu payment would be needed to mitigate no on-site delivery for the 12-17s age group and a very small shortfall for the 5-11s age group:

Play space yield and proposed provision: Summary table				
Block	**Young person yield from development**	**Area of play space required (sq.m)**		**Format (size and location) of proposed provision**
Block C	Aged 0 to 4	462.3	= 1091.8	100.0 sq.m (Block C rooftop) 133.5 sq.m (half of the Block C/D podium) 183.0 sq.m (a portion of the Pocket Park) **[Shortfall: 45.8 sq.m]**
	Aged 5 to 11	361.6		50.5 sq.m (Block C rooftop) 311.1 sq.m (a portion of the Pocket Park) **[Requirement met exactly]**
	Aged 12 to 17	267.9		Zero **[Shortfall: 267.9 sq.m]**

Block D	Aged 0 to 4	226.0	= 444.3	121.0 sq.m (Block D rooftop) 133.5 sq.m (half of the Block C/D podium) **[Surplus: 28.5 sq.m]**
	Aged 5 to 11	153.2		50.5 sq.m (Block D rooftop) 102.9 sq.m (a portion of the Pocket Park) **[Surplus: 0.2 sq.m]**
	Aged 12 to 17	65.1		Zero **[Shortfall: 65.1 sq.m]**
Summary				
Both Blocks	Aged 0 to 11	1203.1		1186.0 sq.m, comprising: • 597.0 sq.m in the Pocket Park; and • 589.0 sq.m across the Block C/D podium, Block C rooftop and Block D rooftop **[Shortfall of 17.1 sq.m to be delivered via in-lieu contribution]**
	Aged 12 to 17	333.0		Zero **[Shortfall of 333.0 sq.m to be delivered via in-lieu contribution]**

311. The images below depict spatially where the areas of play space described in the table above would be located on the application site, demonstrating that there has been no overlapping of play facilities and communal external amenity space when calculating their respective sizes:



***Image 57** (above): Plan of the Pocket Park, showing how the available area would meet some of the total play space requirement.*



***Image 58** (above): Plan of the South Building podium, showing how the available area would meet some of the total 0-4s play space requirement.*



***Image 59** (above): Layout of the rooftops of the South Building, showing how these gardens would provide a mixture of play (0-4s and 5-11s) and communal external amenity space.*

312. With all opportunities for providing playspace on-site exhausted, and as permitted by the Council's CIL and S106 SPD, the shortfall of 350.1 square metres will be mitigated through a payment-in-lieu of £52,865.10 (index linked), based on a tariff of £151 for every square metre shortfall. This financial contribution will go towards improving play space elsewhere in the surrounding area of the site.

313. At ground floor level within the South Building, a room of 169 square metres is proposed fronting onto the accessway that runs along the site's eastern boundary, which the applicant has suggested could be operated as internal play space by the Registered Provider, running costs permitting. While such a facility may in practice complement the proposed on-site external play facilities, it would not mitigate the failure to deliver the full requirement of 1,536.1 square metres of on-site play space – this is reflected in planning policy, which only allows open-to-the-sky facilities to be counted towards play space provision. As such, the applicant's suggestion that internal facilities may

be provided on the ground floor of the South Building should be given no weight in the determination of this application.

314. Turning to the qualitative attributes of the proposed play space, the podium-level garden linking Block C to D is intended to be a planted environment amongst which there would be alcoves of seating, a play house and a raised deck. The latter is intended to provide a platform for imaginative play, performance and socialising. A sand pit with young play elements is also proposed, to be framed by seating and oriented to enjoy eastward views. These play features are aimed at the 0-4s age group. To ensure successful coexistence of the play space alongside the four adjacent private amenity spaces, the perimeter would be planted-out as a playable green 'buffer'.



***Image 60** (above): Plan of the podium garden, which is situated on Level 01 of the South Building between Blocks C and D, with annotation (5) denoting the centralised platform, annotation (6) denoting the sand pit and annotation (9) denoting the playhouse.*

315. Further facilities targeted at the 0-4s age band would be located within the rooftop gardens of both blocks. The type of facilities to be provided here would promote gentle and quiet play, such as balancing beams and tactile landscape features.

316. The London Plan recommends that 0-4s play space be at least 100 square metres, in part because the space needs to be of an adequate size to ensure carers can sit and talk while supervising children. All of the proposed areas of 0-4s play space would meet this requirement. With areas for informal sitting and relaxing have been designed to enclose the play facilities, these three play areas would fully comply with this requirement.

317. The 5-11s age group would enjoy three different spaces designed to meet their needs: the Block C rooftop garden; the Block D rooftop garden; and the

Pocket Park. In the rooftop gardens, play facilities would include balancing boards and low-level climbing structures, In the Pocket Park, the indicative scheme of landscaping suggests play opportunities for 5-11s would include water pump play with rocks, a timber stump play trail, wheeling paths, a 'hidden-in-the-trees' bridge, and a play structure comprising a slide and climbing features.

318. Although there is no part of the site intended specifically for 12-17s play, it should be noted that the Pocket Park would provide facilities likely to appeal to older children, including swings and table tennis. With research having found that girls particularly value having space to simply socialise or observe the activity of others from the perimeter, the applicant has proposed a platform/deck and incidental seating areas within the park to cater for this particular group.





Images 61, 62 and 63 *(above, left to right): Precedent images provided by the applicant of the types of play envisaged for the under-5s (two left hand images) and 5-11s (right hand image).*

319. Southwark Plan Policy P15 requires play space to have multiple egress points, and to be located at ground or low podium. Although the roof gardens at Level 16 of Block C and Level 10 of Block D would not meet these criteria, the applicant's Fire Safety Statement confirms that the location and design of both spaces would comply with the relevant fire safety and building control regulations. The fire exit from both of the gardens would be located centrally such that, for anyone within either garden wishing to egress, the maximum travel distance to the fire exit would be no more than 17.2 metres. Given that separate regulatory regimes exist to deal with fire safety and building control matters, it is considered that the effective operation of those regimes can be relied upon to deal with any fire or building safety risk that the two high-level play spaces may present. As such, the proposal for high-level play spaces with single egress points is, in this instance, considered acceptable having regard to the relevant planning policies and the role of the planning system.

320. It is also noted that other higher level play and amenity spaces completed within the Old Kent Road have provided well used spaces on completion and operation that offer good levels of natural light and excellent aspects.

321. Service charge costs to social rent tenants would be capped within social rent cap levels.

322. Planning conditions are recommended requiring details of the three resident-only play spaces and the Pocket Park, including equipment and treatment, which will include a requirement for water and sand play facilities to be provided on the podium and in the Pocket Park. These conditions will require the facilities to be delivered prior to occupation of any of the dwellings. With these details secured, the proposed play space offer is considered acceptable.

Amenity impacts on nearby residential occupiers and the surrounding area

323. The importance of protecting neighbouring amenity is set out in Southwark Plan Policy P56, which states “development should not be permitted when it causes an unacceptable loss of amenity to present or future occupiers or users”. The 2015 Technical Update to the Residential Design Standards SPD 2011 expands on policy and sets out guidance for protecting amenity in relation to privacy, daylight and sunlight.

Daylight and sunlight

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

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

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

Properties assessed for daylight impacts

327. This planning application was accompanied by a daylight and sunlight assessment undertaken in accordance with the BRE guidelines. The document assesses the extent to which the proposed development would affect the dwellings in the following buildings:

    a. 141 Verney Road (also known as 128 Ilderton Road);
    b. 45-56 Barkworth Road;
    c. 35 and 37 Ablett Street;
    d. 34, 36 and 38 Delaford Road;
    e. 21-43 Delaford Road flats; and
    f. 1-17 (odds, inclusive) and 19 Delaford Road.

328. The above seven properties were tested for VSC and NSL impacts, but not illuminance as this method is more appropriately applied to new buildings.

329. Testing was also undertaken of the following building, which is a place of worship with ancillary office facilities, and thus has a reasonable expectation of daylight receipt:

    g. Baptist Church at 163 Ilderton Road.

330. The applicant's daylight and sunlight assessment also undertook testing of:

    h. Primary School at 128 Ilderton Road [educational use]; and
    i. 171-177 Ilderton Road.

331. However, by reason of their distance from and relationship to the site, none of these three buildings would experience any daylight impacts above the recommendations of the BRE guidance. Therefore, this report gives no further consideration to the daylight impacts on these properties.

332. Provided below is a map of the tested residential buildings (edged in orange) and the tested non-residential buildings (edged in red) showing their relationship to the application site (shaded below):



Image 64 *(above): Plan of the site with the surrounding existing sensitive residential and non-residential buildings. The references 'a' to 'i' correspond with the addresses as listed above.*

333. East of the application site, on the opposite side of the elevated mainline railway line is the outline consented scheme known as Surrey Canal Triangle (Lewisham planning application reference number: DC/13/085143). Although Surrey Canal Triangle is not yet under construction, given the outline planning status of the development, it has been included within the baseline of the submitted technical assessments. It is shaded pink in the image above. It is appropriate to factor-in schemes with a reasonable prospect of being built-out and which will cause material reductions in daylight and sunlight to receptors in the vicinity of an application site, in order that the cumulative 'worst-case scenario' for all neighbouring residential receptors has been assessed.



Image 65 *(above): Visualisation of the Surrey Canal Triangle outline consented scheme (in pink) in relation to the application site, the proposed development (in blue) and the existing built context.*

VSC and NSL impacts for sensitive surrounding residential properties

334. The tables below summarise the VSC impacts to surrounding properties as a result of the proposed development being built-out in the present day context plus the Surrey Canal consented development. The first table is concerned with residential properties and the second table is concerned with non-residential properties. Both tables include a comparison of the proposal's impacts relative to those caused by the extant permission (23/AP/0387):

Residential Property	**Number of windows that would experience a VSC reduction (as a percentage of the baseline VSC value)**			
	No loss or a loss of up to 19.9%	**20%-29.9% (minor adverse impact)**	**30%-39.9% (moderate adverse impact)**	**40% + (substantial adverse impact)**
141 Verney Road (also known as 128 Ilderton Road)				
Total no. habitable windows tested: 24				
• Of the 24 windows, 5 would retain a VSC of 27% or more.				

• For the 19 that would not, the distribution of percentage reductions is:				
Proposed vs existing	**4**	**0**	**5**	**10**
Comparison of the proposal's impacts against those caused by consented scheme				
23/AP/0387 vs existing**	11	8	0	0
Comparative impact of 23/AP/0387		Better: 8 fewer	Worse: 5 more	Worse: 10 more
*** Note: in this scenario, of the 24 windows tested, 5 retained a VSC of 27% or more*				
45-56 Barkworth Road				
Total no. habitable room windows tested: 166				
• Of the 166 windows, 21 would retain a VSC of 27% or more. • For the 145 that would not, the distribution of percentage reductions is:				
Proposed vs existing	**10**	**6**	**11**	**118**
Comparison of the proposal's impacts against those caused by consented scheme				
23/AP/0387 vs existing**	16	16	25	89
Comparative impact of 24/AP/3687		Better: 10 fewer	Better: 14 fewer	Worse: 29 more
*** Note: in this scenario, of the 166 windows tested, 20 retained a VSC of 27% or more*				
35 and 37 Ablett Street				
Total no. habitable room windows tested: 11				
• Of the 11 windows, 1 would retain a VSC of 27% or more. • For the 10 that would not, the distribution of percentage reductions is:				
Proposed vs existing	**3**	**6**	**0**	**1**
Comparison of the proposal's impacts against those caused by consented scheme				
23/AP/0387 vs existing**	5	3	0	1
Comparative impact of 24/AP/3687		Worse: 3 more	No change	No change
*** Note: in this scenario, of the 11 windows tested, 2 retained a VSC of 27% or more*				
34, 36 and 38 Delaford Road				
Total no. habitable room windows tested: 18				
• Of the 1 windows, 1 would retain a VSC of 27% or more. • For the 18 that would not, the distribution of percentage reductions is:				
Proposed vs existing	**13**	**3**	**0**	**2**
Comparison of the proposal's impacts against those caused by consented scheme				
23/AP/0347 vs existing**	13	2	2	0
Comparative impact of 24/AP/3687		Worse: 1 more	Better: 2 fewer	Worse: 2 more

*** Note: in this scenario, of the 18 windows tested, 1 retained a VSC of 27% or more*				
21-43 Delaford Road flats				
Total no. habitable room windows tested: 38 • Of the 38 windows, 17 would retain a VSC of 27% or more. • For the 21 that would not, the distribution of percentage reductions is:				
Proposed vs existing	**17**	**3**	**1**	**0**
Comparison of the proposal's impacts against those caused by consented scheme				
23/AP/0387 vs existing**	23	0	0	0
Comparative impact of 24/AP/3687		Worse: 3 more	Worse: 1 more	No change
*** Note: in this scenario, of the 38 windows tested, 15 retained a VSC of 27% or more*				
1-15 (odds, inclusive) and 19 Delaford Road				
Total no. habitable room windows tested: 23 • Of the 23 windows, 6 would retain a VSC of 27% or more. • For the 17 that would not, the distribution of percentage reductions is:				
Proposed vs existing	**17**	**0**	**0**	**0**
Comparison of the proposal's impacts against those caused by consented scheme				
It is not possible to draw a direct comparison between the proposal's impacts and those caused by the consented scheme, because the DSO report for the consented scheme did not test nos. 9 and 15 Delaford Road.				
***Methodological consistency note**:* *The 24/AP/3687 DSO report identifies that a number of the neighbouring windows assessed in the 23/AP/0387 DSO report (and which were cited in the 23/AP/0387 Committee Report) actually serve a non-habitable room. As per the BRE recommendations, the 24/AP/3687 DSO report excludes the results for all non-habitable room windows; consequently, it reports slightly fewer results than the 23/AP/0387 DSO report. To ensure the VSC impacts of the 24/AP/3687 proposal can be compared with the VSC impacts of the consented scheme on a true like-for-like basis, where the above tables cite the number of impacted windows for 23/AP/0387, this figure has been downwards-adjusted from the figures given in the 23/AP/0387 Committee Report to exclude any non-habitable rooms.*				

Non-residential Property	**Number of windows that would experience a VSC reduction (as a percentage of the baseline VSC value)**			
	No loss or a loss of up to 19.9%	**20%-29.9% (minor adverse impact)**	**30%-39.9% (moderate adverse impact)**	**40% + (substantial adverse impact)**
Former Baptist Church at 163 Ilderton Road				
Total no. habitable windows tested: 38				

• Of the 38 windows, 10 would retain a VSC of 27% or more. • For the 28 that would not, the distribution of percentage reductions is:				
Proposed vs existing	**9**	**0**	**4**	**15**
Comparison of the proposal's impacts against those caused by consented scheme				
23/AP/0387 vs existing**	16	14	0	0
Comparative impact of 24/AP/3687		Better: 14 fewer	Worse: 4 more	Worse: 15 more
*** Note: in this scenario, of the 38 windows tested, 8 retained a VSC of 27% or more*				

335. The table below summarises the NSL (also known as 'daylight distribution') impacts to surrounding properties as a result of the proposed development being built-out in the present day context plus the Surrey Canal consented development. The first table is concerned with residential properties and the second table is concerned with non-residential properties. Both tables include a comparison of the proposal's impacts relative to those caused by the extant permission (23/AP/0387):

Residential property	**No. rooms that would experience a reduction in NSL (as a percentage of the baseline NSL value)**			
	No loss or a loss of up to 19.9%	**20%-29.9% (minor adverse impact)**	**30%-39.9% (moderate adverse impact)**	**40% + (substantial adverse impact)**
141 Verney Road (also known as 128 Ilderton Road)				
Total no. habitable rooms tested: 15				
Proposed vs existing	**5**	**0**	**5**	**5**
Comparison of the proposal's impacts against those caused by consented scheme				
23/AP/0387 vs existing	15	0	0	0
Comparative impact of 24/AP/3687		No change	Worse: 5 more	Worse: 5 more
45-56 Barkworth Road				
Total no. habitable rooms tested: 101				
Proposed vs existing	**33**	**34**	**13**	**21**
Comparison of the proposal's impacts against those caused by consented scheme				
23/AP/0387 vs existing	41	22	29	9
Comparative impact of 24/AP/3687		Worse: 12 more	Better: 16 fewer	Worse: 12 more
35 and 37 Ablett Street				
Total no. habitable rooms tested: 8				

Proposed vs existing	**8**	**0**	**0**	**0**
Comparison of the proposal's impacts against those caused by consented scheme				
23/AP/0387 vs existing	7	0	1	0
Comparative impact of 24/AP/3687		No change	Better: 1 fewer	No change

34, 36 and 38 Delaford Road				
Total no. habitable rooms tested: 14				
Proposed vs existing	**14**	**0**	**0**	**0**
Comparison of the proposal's impacts against those caused by consented scheme				
23/AP/0387 vs existing	13	1	0	0
Comparative impact of 24/AP/3687		Better: 1 fewer	No change	No change

21-43 Delaford Road flats				
Total no. habitable rooms tested: 23				
Proposed vs existing	**23**	**0**	**0**	**0**
Comparison of the proposal's impacts against those caused by consented scheme				
23/AP/0387 vs existing	23	0	0	0
Comparative impact of 24/AP/3687		No change	No change	No change

1-15 (odds, inclusive) and 19 Delaford Road				
Total no. habitable rooms tested: 18				
Proposed vs existing	**16**	**2**	**0**	**0**
Comparison of the proposal's impacts against those caused by consented scheme				

It is not possible to draw a direct comparison between the proposal's impacts and those caused by the consented scheme, because the DSO report for the consented scheme did not test nos. 9 and 15 Delaford Road.

***Methodological consistency note**:*

The 24/AP/3687 DSO report identifies that a number of the neighbouring windows assessed in the 23/AP/0387 DSO report (and which were cited in the 23/AP/0387 Committee Report) actually serve a non-habitable room. It also identified that the previous report treated what are single rooms served by two or more windows as multiple rooms each served by a single window. Consequently, the 24/AP/0387 DSO reports slightly fewer results than the 23/AP/0387 DSO report. To ensure the NSL impacts of the 24/AP/3687 proposal can be compared with the NSL impacts of the consented scheme on a true like-for-like basis, where the above tables cite the number of impacted rooms for 23/AP/0387, this figure has been downwards-adjusted from the figures given in the 23/AP/0387 Committee Report.

Non-residential Property	**No. rooms that would experience a reduction in NSL (as a percentage of the baseline NSL value)**			
	No loss or	**20%-29.9%**	**30%-39.9%**	**40% +**

	a loss of up to 19.9%	(minor adverse impact)	(moderate adverse impact)	(substantial adverse impact)
Former Baptist Church at 163 Ilderton Road				
Total no. habitable rooms tested: 11				
Proposed vs existing	**11**	**0**	**0**	**0**
Comparison of the proposal's impacts against those caused by consented scheme				
23/AP/0387 vs existing**	11	0	0	0
Comparative impact of 24/AP/3687		No change	No change	No change

141 Verney Road

336. 141 Verney Road is a five storey building comprising flats, with one flat per floor facing in the direction of the application site.

337. Of the 10 windows to undergo a substantial loss of VSC, eight would retain an absolute level of VSC within the 10% and 14.9% range, which although low is not common for an urban environment and would not result in harm to amenity.

338. The other two windows to undergo a substantial loss would experience an absolute resulting VSC of 8.87% and 9.42% respectively. This would have appreciable impact on the amenity of these rooms. However, because both of these rooms front directly onto the back of the western side of Ilderton Road, it would not be reasonable to require development on the application site to step-back excessively from its Ilderton Road frontage in order to reduce the level of VSC loss at the two existing windows. Additionally, the two windows in question serve rooms forming part of dual aspect flats; this means that there is at least one window in the dwelling whose daylight is not adversely impacted, thereby ensuring a reasonable overall level of daylight amenity for the occupants.

339. In terms of the second daylight assessment, the NSL, all of the site-facing rooms at 141 Verney Road currently benefit from an exceptionally high level of sky visibility for an urban setting of this type. This is because the land directly opposite (the application site) is empty of buildings. Thus, and as with the VSC analysis discussed above, relative changes in NSL exceeding the typical 20% margin in the BRE guidance are to be expected from redevelopment of the land and are not necessarily indicative of unreasonable levels of retained daylight amenity in the rooms affected. Moreover, and as discussed in detail above, the existing outlook of these properties over the undeveloped site means that any development in accordance with the ambitions of the draft AAP would inevitably, and noticeably, breach the typical recommendations in the BRE Guidelines. The most heavily impacted window at 141 Verney Road would see the area of sky visibility reduce to 5.2 square metres, down from an existing square metreage of 10.4. While noticeable to the room occupants',

this would not be harmful to amenity.

340. For these reasons, the daylight impacts on the flats at 141 Verney Road are considered acceptable on balance.

45-56 Barkworth Road

341. Nos. 45-56 Barkworth Road is a group of five apartment buildings, arranged in two clusters either side of Barkworth Road:

- nos. 45 and 47, “the southern cluster”, are a conjoined pair to the south side of the road; and
- nos. 52, 54 and 56, “the northern cluster”, form a conjoined trio to the north side of the road.

342. In terms of current daylight receipt, all the apartments experience extremely good amenity. For example, the average existing level of absolute VSC across all the apartments (with unobstructed views over the site) is circa 27%. To retain these VSC levels would require the height of any redevelopment on the application site to be lower than a threshold plane angled at 25° from horizontal. However, such low-rise buildings would not align with the intentions of the draft OKR AAP, which anticipates redevelopment of the site to be significantly beyond the parameters of a 25° plane, with an expectation of delivering buildings that would be noticeably taller than the existing surrounding context.

343. Of the 166 windows tested, 118 would undergo a substantial adverse VSC reduction. These split between the northern and southern clusters in a ratio of 79:39.

344. The 118 substantially adversely impacted windows would retain the following absolute VSC levels:

- 15.0% or higher: none
- 10.0% to 14.9%: x59 windows
- 9.9% or lower: x59 windows

345. Almost all of the 59 windows whose resulting absolute VSC would be less than 10.0% are overhung by the deeply-projecting eaves of the roof structure; these features of the buildings’ own design have the effect of reducing the availability of daylight. As a result, the existing VSC levels are generally lower than would otherwise be expected, and the windows are more sensitive to changes in the skyline directly opposite. While the proposed development would have an appreciable impact on the occupiers’ amenity, it is not considered that the degree of harm would warrant refusal of planning permission.

346. For the 59 windows that would retain a VSC of 10.0% to 14.9%, while these levels are low, they are not unreasonably so given the properties’ location in an Opportunity Area where significant densification is expected.

347. With regard to NSL, all of the site-facing rooms at 45-56 Barkworth Road currently benefit from an exceptionally high level of sky visibility for an urban setting of this type. This is because, like its neighbour 141 Verney Road, this block of flats faces directly opposite the application site, which is presently an empty plot of land. As discussed above in relation to 141 Verney Road, relative changes in NSL exceeding the typical 20% margin in the BRE guidance are to be expected from redevelopment of the land and are not necessarily indicative of unreasonable levels of retained daylight amenity in the rooms affected. Moreover, and as discussed in detail above, the existing outlook of these properties over the undeveloped site means that any development in accordance with the ambitions of the draft AAP would inevitably, and noticeably, breach the typical recommendations in the BRE Guidelines.

348. The greatest level of NSL impact (categorised as “substantial adverse”) would be experienced by 21 of the 104 rooms tested. The single greatest proportional change would affect a ground floor room at 45-47 Barkworth Road. In this room, the portion from which sky can be seen would drop from 14.5 square metres to 3.6 square metres as a result of the development. A change of this magnitude would be noticeable to the occupiers, with users only able to see direct sky from the frontmost quarter of the room. Although this impact on residential amenity must be recognised, any reasonable redevelopment of the application site would produce significant reductions in sky visibility for the ground floor rooms at the Barkworth Road flats due to their parallel orientation relative to the site. For a central London location, the resulting NSLs, although low in some cases, would not be harmful to overall amenity.

349. In summary, the redevelopment of this vacant site to facilitate any development in line with the ambitions of the draft AAP would result in windows and rooms at nearby properties incurring a relative change to their daylight amenity in excess of the parameters advised by the BRE. As discussed above, in these situations the BRE guidance recommends that decision-makers take into account the absolute levels of daylight that would be retained. This more detailed analysis shows that, while there would be harmful VSC impacts for some of the Barkworth Road flats, in a number of these instances the starting absolute VSC is low and/or the effects are partly attributable to the buildings’ own design. With regard to NSL, while there would be a number of instances where the proportion of the rooms from which sky can be seen would be adversely reduced, the remaining proportion from which the room users would enjoy direct sky visibility would be sufficient to guard against the spaces feeling uncomfortably colder or darker.

350. Taking into account all of the considerations discussed above, on balance the impacts for the 45-56 Barkworth Road properties are considered acceptable.

35 and 37 Ablett Street

351. Together, this pair of two-storey dwellinghouses would experience six minor adverse VSC losses and one substantial adverse VSC loss. Out of the seven

window transgressions, six would retain an absolute VSC in excess of 16%, which –while lower than the absolute VSC of 27% recommended by the BRE– is not untypical for an urban location. These resulting absolute VSCs indicate that occupiers would enjoy reasonable levels of natural light.

352. The one other window to undergo an adverse loss of VSC would be at ground floor level in the side elevation of 37 Ablett Street. Its resulting absolute VSC would be 7.59%, down from an existing absolute VSC of 21.75%. The window faces directly towards the application site, and thus is reliant on the openness of the site for its current level of daylight. Any reasonable redevelopment of the site would, therefore, inevitably affect VSC receipt. It should also be noted that the window in question is a secondary source of daylight for the property's occupiers, the host room being served a much larger principal window. Bearing in mind that no windows at either of these properties would result in changes to NSL beyond the BRE guidelines, it is not considered that the impact on the occupiers of the Ablett Street properties would be harmful.

34, 36 and 38 Delaford Road

353. The results of the VSC assessment show that 14 of the 18 windows would adhere to the BRE Guidelines. The other four windows are all located at ground floor level, and comprise:

- three in the single-storey side extension at 38 Delaford Road, of which:
  - two (both of which are in the rear elevation) would undergo minor adverse losses; and
  - one (in the side elevation) would undergo a substantial adverse loss; and
- one in the side elevation of 34 Delaford Road, which would experience a substantial adverse impact.

354. The single greatest percentage loss and the single lowest resulting absolute VSC would occur at the same window; this is the ground floor level in the side elevation of 34 Delaford Road. The proposed absolute VSC would be 6.01%, reduced from an existing absolute VSC of 12.69%, equating to a percentage loss of 53%. Although impacts of this kind would be noticeable to room occupants, the window's existing absolute VSC is low. This is largely a consequence of its proximity to the neighbouring property, 36 Delaford Road, which causes the window's principal source of daylight to be limited to a small area in the direction of the application site; any reasonable redevelopment of the application site (which in its current state is completely undeveloped) would, therefore, inevitably produce a sizeable degree of impact. On balance, the resulting absolute VSC would not be harmful to residential amenity.

355. A final relevant consideration is that the NSL and VSC impacts produced by the proposed development are in the main not significantly different to the impacts recorded by the extant planning permission, 23/AP/0387.

21-43 Delaford Road flats

356. At this block of flats, a total of four windows would experience VSC losses beyond the BRE guidelines, three of which would fall within the “minor adverse” category. The “minor adverse” exceedances would only be marginally beyond the 20% threshold established by the BRE. The one other adverse loss –which would fall within the “moderate” category– would affect a top floor window located within a chamfered bay/wing. This window would experience a 32% loss, resulting in an absolute VSC of 8.85%. While this impact must be recognised, it should be noted that the VSC level of this window is already relatively low; this is attributable partly to it being obliquely flanked by a neighbouring wall and partly to the deeply overhanging roof eaves immediately above. As such, any further reduction generates a sizeable percentage loss that isn’t necessarily reflective of the impact the room users will experience.

357. The fact that there would be no NSL losses in excess of the BRE guidance supports the position that there would be no materially harmful impact to the daylight levels and feel of the affected rooms

1-19 (odds, inclusive) Delaford Road

358. None of these six properties would experience a VSC loss in excess of the BRE guidance.

359. With regard to NSL, the two rooms to experience a minor adverse impact are at 11 Delaford Road. The two rooms have a slightly compromised NSL at present because of their non-parallel orientation in relation to the existing adjacent property at 9 Delaford Road. The two minor adverse reductions only marginally exceed the 20% BRE threshold. As such, the occupier(s) of this property would not have their amenity harmed.

Baptist Church at 163 Ilderton Road

360. While none of the windows at the Baptist Church would undergo NSL losses in excess of the BRE guidelines, VSC would be reduced to beyond the BRE recommendation in 19 instances. 4 of these adverse impacts would qualify as ‘moderate’ and the other 15 would qualify as ‘substantial’. The single greatest percentage reduction would be 53% and the lowest resulting absolute VSC would be 13.57%. For a sensitive non-residential building, this extent of impact and the retained VSC levels would not render the interior spaces impractical or severely limited for the uses they typically host.

Surrey Canal Triangle Site

361. In addition to the residential properties that surround the south and west of the site, an assessment of the outline consented scheme for the Surrey Canal Triangle site was also undertaken. The purpose of this was to establish any potential effects on the daylight availability to the site-facing facades following the implementation of the proposed development. Given the outline status of the Surrey Canal Triangle consent, details are not yet available on the room and window locations of the development, and as such a VSC daylight façade

analysis was undertaken to indicate the potential for daylight availability on those elevations that face towards the proposed development.

362. The results of the proposed VSC façade assessment show that the vertical elevations of the proposed Surrey Canal Triangle scheme will retain very good daylight availability. The recorded changes from the existing scenario are isolated to the western elevation on the lower levels. In any event, the assessment demonstrates the retained values at the lower levels will remain good with the vast majority retaining at least 15% VSC.

Sunlight

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

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

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

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

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

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

367. The six properties assessed for daylight impacts have also been assessed for sunlight impacts. The table below summarises these:

Property	**No. rooms that would experience a reduction in sunlight hours**			
	No. of rooms tested	**No. of rooms that pass**	**No. of rooms that fail winter**	**No. of rooms that fail annual**
128 Ilderton Road				
Proposed vs existing	5	5	**0**	**0**

Comparison of the proposal's impacts against those caused by consented scheme				
23/AP/0387 vs existing	5	5	0	0
Comparative impact of 24/AP/3687		No change	No change	No change
45-56 Barkworth Road				
Proposed vs existing	15	15	**0**	**0**
Comparison of the proposal's impacts against those caused by consented scheme				
It is not possible to draw a direct comparison between the proposal's impacts and those caused by the consented scheme, because the DSO report for the consented scheme did not test as many windows as the 24/AP/3687 DSO.				
35 and 37 Ablett Street				
Proposed vs existing	4	4	**0**	**0**
Comparison of the proposal's impacts against those caused by consented scheme				
23/AP/0387 vs existing	4	4	0	0
Comparative impact of 24/AP/3687		No change	No change	No change
34, 36 and 38 Delaford Road				
Proposed vs existing	10	10	**0**	**0**
Comparison of the proposal's impacts against those caused by consented scheme				
23/AP/0387 vs existing	10	10	0	0
Comparative impact of 24/AP/3687		No change	No change	No change
21-43 Delaford Road flats				
Proposed vs existing	15	14	**0**	**1**
Comparison of the proposal's impacts against those caused by consented scheme				
It is not possible to draw a direct comparison between the proposal's impacts and those caused by the consented scheme, because the DSO report for the consented scheme did not test as many windows as the 24/AP/3687 DSO.				
11, 13, 15 and 19 (odds, inclusive) Delaford Road				
Proposed vs existing	9	6	**0**	**3**
Comparison of the proposal's impacts against those caused by consented scheme				
It is not possible to draw a direct comparison between the proposal's impacts and those caused by the consented scheme, because the DSO report for the consented scheme did not test as many windows as the 24/AP/3687 DSO.				

368. In the case of the addresses where exceedances would occur (the Delaford Road flats, 11 Delaford Road and 13 Delaford Road), by reason of their outlook directly towards the currently vacant application site all of these windows benefit from very good sunlight levels at present. Their orientation is to the southeast, this angle making them heavily reliant on the site for sunlight hours. Thus, any meaningful development opposite would result in a sizeable loss. While acknowledging that there would be an appreciable change to WPSH and/or APSH for the occupiers, on balance the impacts would not be harmful to residential amenity.

Daylight and sunlight impacts relative to those caused by 18/AP/2497

369. As the tables above show, the effect on neighbouring properties caused by the proposed development would be similar to those produced by the previous planning consent for the site, 23/AP/0387, which is extant and thus could technically be implemented. In determining 24/AP/3687 some weight must be given to the fact that the daylight and sunlight losses produced by the newly-proposed development are not substantially greater than those established by 23/AP/0387.

Conclusion on daylight and sunlight

370. In total, the development would result in 18 minor, 21 moderate and 146 substantial adverse reductions in VSC for surrounding properties. With respect to NSL, there would be a total of 36 minor, 18 moderate and 26 substantial reductions for surrounding properties. These exceedances of the BRE guidance, and the negative impact they would have on neighbour amenity, should be given some weight in determining the application.

371. Sunlight exceedances would be experienced by a small number of windows at the Delaford Road properties, including one of the flats. All of these windows face east in the general direction of the application site. As such, they are reliant on the openness of the land to achieve these baseline sunlight levels, which are relatively high for an urban environment. In turn, this makes the windows more susceptible to change. While the extent of ASPH impact is recognised, it is not considered that the resulting levels would be harmful to amenity.

372. The existing site is an empty lot of land. As a result, the existing levels of daylight within the surrounding residential properties looking over the site are unusually high for an urban location, and particularly so for a site on the fringes of an opportunity area where there is an expectation of delivering a development with a significantly greater density than that of the current surrounding context.

373. When considering the overall impact on the amenity and enjoyment of neighbouring homes, it is useful to also consider the benefits of the development for those neighbours. They currently overlook a vacant and unkempt site, used most recently for vehicle parking. This use would, in most circumstances, be considered a poor neighbour, causing noise and being to

some degree unsightly. The introduction of high quality buildings, albeit ones which affect daylight and sunlight, would have some benefits to the outlook and sense of place of these homes.

374. Given the location within the Old Kent Road Opportunity Area, where more intensive development is expected and where the BRE guidelines should be applied flexibly following the design-led approach to density promoted by the London Plan, the impacts are on balance acceptable. As noted above, the BRE guidelines are not mandatory and the advice within the guide should not be seen as an instrument of planning policy. Some of the impacts would go beyond the recommended guidelines but these are not of such significance that it would warrant a reason for refusal of an otherwise acceptable development.

Overshadowing

375. The test promoted by the BRE for assessing overshadowing impacts on external amenity space is the 'Sun on Ground' assessment. This models the proportion of an outdoor amenity space where the sun would reach the ground on 21st March each year. On that date, the BRE advises that at least 50% of the area tested should receive a minimum of two hours of sunlight.

376. There are four amenity spaces at properties neighbouring the application site which are potentially at risk of overshadowing as a consequence of the proposed development. These are the rear gardens of 35 Ablett Street, 37 Ablett Street, 36 Delaford Road and 38 Delaford Road. In the existing condition, three of the four amenity spaces record in excess of 70% of their surface area receiving at least 2 hours in sunlight on 21st March, while one records 34% coverage. With the proposed development in place, each space would either:

- continue to receive 2 hours in sunlight to 50%+ of its surface area; or
- record a light change of no more than 20% from its former value.

377. With the BRE guidelines having been met, it can be concluded that no external amenity areas at nearby properties would be subject to harmful overshadowing.

Privacy

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

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

379. All the ‘across street’ distances between the development and habitable residential rooms opposite would exceed 12 metres, with many being in excess of 21 metres. The closest distance between the proposed development and neighbouring residential building is 14 metres (to 128 Ilderton Road), but these existing windows form part of dual aspect flats, and as such overall it is not considered that there would be any harmful impact on the amenity for the occupiers. All remaining properties are over 19 metres away from the proposed development and the distance to the Travellers’ Site would be in excess of 40 metres. In summary, because the 12 metre ‘across street’ guideline of the Residential Design Standards would be achieved, no privacy infringement issues are raised.

380. It should also be noted that any potential of overlooking and/or perceived overlooking of the Ilderton Road Travellers’ Site to the north of the application site has been minimised by proposing only one clear-glazed window per floor in the northern elevation of the North Building.

381. In terms of the relationship to the Surrey Canal Triangle site, where planning permission has been granted for wholesale residential-led redevelopment, the elevated railway line and its embankments create a separation distance of more than 50 metres, meaning there would be any overlooking issues in respect of any future homes that may be built on this nearby land.

Outlook and sense of enclosure

382. The site is located within the Old Kent Road Opportunity Area, where there is an expectation for greater densities and taller buildings to come forward, changing the urban grain of the locality. The proposed development would introduce to the site two buildings (the ‘North’ and the ‘South’), each modelled as a plinth block supporting two towers above, either side of a central publicly-open space. This arrangement of buildings creates a sequence of gaps, allowing for views ‘through’ and opening up views of the sky for residents of the existing nearby dwellings. The incorporation of high quality materials and low-level greening throughout the development would give complexity and visual relief to the building forms, having a positive effect on the surrounding properties’ outlook. As such, it is not considered that any of the surrounding dwellings that look towards the site would experience a harmfully diminished quality of outlook or sense of openness as a result of the proposed development.

Management and maintenance of the PBCL

383. It is proposed that the PBCL premises will be operated by Fresh. Fresh has 58 operational schemes across the UK and Europe, providing management services to over 19,000 rooms across the UK and Europe. In the main, these are Purpose Built Student Accommodation developments including one in Southwark (‘Great Court’ on St James’s Road); however, their portfolio also includes some PBCL and Build-to-Rent developments. Fresh has been involved in the design evolution of the proposal to ensure it is fit for purpose.

384. As mentioned in an earlier part of this report, Policy H16 and Paragraph 4.16.4 of the London Plan require PBCL developments to be accompanied by an Operational Management Plan. This is in the interests of ensuring that, amongst other things, the development once operational:

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

385. The Operational Management Plan submitted in support of this application sets out how the development will be managed and the various spaces within the development will be maintained. In terms of the ways in which potential sources of neighbour disturbance, such as noise nuisance, would be minimised through management arrangements, the Plan details the following provisions:

- Staffing:
  - the applicant predicts that the on-site management team would number 25 FTE roles in total, comprising the following:
    - General Manager x 1 - Full Time
    - Resident Manager x 1 - Full Time
    - Resident Advisors x at least 1 - Full Time
    - Engagement Assistant x 1- Full Time
    - Maintenance Operative x 1 - Full Time
  - the role with the greatest responsibility will be the dedicated general manager, who will lead the management team and act as the key communicator between resident members and the wider network of staff;
  - 24/7 on-site presence will be provided, fulfilled by the General Manager during the day and early evening with security covering the out-of-hours period.

- Noise and anti-social behaviour:
  - tenancy agreements will include rules and regulations relating to the property and local neighbourhood considerations;
  - all residents will have a welcome and induction session and be provided with a guide to ‘Living at the site’;
  - any antisocial behaviour, such as excessive noise, caused by residents will be actively recorded and managed by the site management team;
  - the operator will employ a ‘good neighbour policy’ to ensure the PBCL residents understand expectations about noise and anti-social behaviour, and to reassure local people that concerns about anti-social behaviour will be listened to and steps taken to address them.

- Community liaison:
  - on-site staff will actively seek to be part of, and work with, local groups (such as local Resident Watch Schemes);

- a formal complaint and incident procedure to the management company.

- Security
  - CCTV cameras in and around the building will be fed back to the management office to allow monitoring of incidents and potential incidents 24/7; and
  - there will also be an electronic access control system to prevent unauthorised access into the building.

- Tenancies
  - Where tenants breach the agreement, the residents team will be on hand to deal with matters initially in an informal way, and then through formal enforcement using due process if necessary

386. On account of the above, it is considered that sufficient information has been provided to address the requirements of Policy H16, and that a robust framework strategy is in place to ensure the day-to-day operation of the PBCL accommodation would not cause harm to the amenity of surrounding residents. Through a planning condition, a finalised version of the Operational Management Plan will be required prior to occupation of the accommodation.

Noise and vibration

Plant noise

387. Plant (power, heating and cooling machinery) would be contained within the basement and ground floor levels of the South Building and the North Building. Both buildings would also contain rooftop plant: at the North Building, there would be ASHPs serving the PBCL communal amenity spaces as well as the commercial unit (Units 1), while at the South Building there would be ASHPs serving the two remaining commercial/community units (Units 2 and 3) and the conventional residential dwellings. This rooftop plant would be screened behind an acoustic enclosure.

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

Public noise nuisance

389. In terms of public noise nuisance from the development for surrounding residents, an Operational Management Plan submitted with the application details how the probable provider, Fresh, would operate the accommodation so as to limit sources of human noise disturbance to neighbours. The outdoor amenity spaces have the greatest potential to cause disturbance to

surrounding residents, and as such these will be limited to the following hours of opening:

- 07:00-23:00 all days of the week, including Bank Holidays.

390. The only other potential sources of public noise nuisance are the two proposed commercial units and the one proposed commercial/community unit. Examples include the use of one or more of these units for a café/restaurant function, and any entertainment or music taking place incidental to this function.

391. In order to limit any risk of public noise nuisance, it is recommended that the following opening hours limitations be imposed on all three units if they are to be used for any function other than office:

- 07:00-23:00 Mondays to Saturdays; and
- 07:00-22:00 Sundays and Bank Holidays.

392. A separate condition is proposed to control the hours of servicing/deliveries to the three units.

Vibration

393. The site is adjacent to a railway line. The applicant's Noise Assessment predicts that the Vibration Dose Values (VDV) would be significantly below the thresholds at which British Standard 6472 suggests even a 'low probability of adverse' impact would occur. Furthermore, the predicted Vibration Dose Values would, in the worst case scenario, be significantly below the Council's standard requirement of a night-time maximum threshold of 0.13 m/ $s^{1.75}$.

Odour

394. The application is not accompanied by any extraction details. Preserving the architectural integrity of the proposed development, with its appurtenance-free façade, is considered to be of importance to the success of the development in terms of its townscape role. Thus, it is likely that any scheme of externally-affixed extraction (which would in all probability need to rise up the full profile of the building to terminate at roof level) would militate against an exemplary building design. Accordingly, it is expected that the flexible commercial units, if used for restaurant/café purposes, would contain re-heat facilities rather than full cooking facilities with extracts/exhausts. A fully internalised extraction system would minimise the risk of odour impacts for the residential occupiers above and those residing in surrounding properties. Alternatively, ventilation for a small-scale prep kitchen could be achieved by utilising the soffit of the commercial units and then venting it solely through the ground floor façade.

395. For safeguarding purposes, a condition is recommended requiring details of any extraction and ventilation system to be submitted to the Council for its consideration prior to the installation of any such system.

Design

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

397. Chapter 3 of the London Plan deals with design related matters. Policy D3 promotes a design-led approach to making the best use of land. Policies D4 and D8 build on this, setting out the design principles for ensuring new development makes a positive contribution in terms of architecture, public realm, streetscape and cityscape. Policy HC1 advises that development affecting heritage assets and their settings should conserve their significance by being sympathetic in their form, scale, materials and architectural detail.

398. London Plan Policy D9 is specifically concerned with tall buildings. The policy contains a list of criteria against which to assess the impact of a proposed tall building – namely locational, visual, functional, environmental and cumulative. London Plan Policy D4 requires all proposals exceeding 30 metres in height to have undergone at least one design review or demonstrate that they have undergone a local borough process of design scrutiny. The proposed building would, at 95.45 metres above ground level, exceed the 30 metre threshold. It thus engages Policy D9.

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

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

400. Specifically for tall buildings, Policy P17 requires:

- the location to be within a major town centre, an opportunity area and/or the CAZ, where tall buildings are appropriate;
- the location to be at an area of landmark significance;

- proposals to be of a proportionate height to the location and site;
- proposals to have a positive impact on the London skyline;
- proposals to respond positively to local character and townscape;
- there to be no harmful impact on strategic views;
- proposals to provide a functional public space; and
- the provision of newly publically accessible space near or at the top of the building where appropriate.

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

- be of exemplary design and quality;
- conserve and enhance designated heritage assets and make a positive contribution to the wider townscape;
- avoid harmful environmental impacts;
- maximise energy efficiency; and
- have a positive relationship with the public realm, provide opportunities for new street trees, design lower floors to successfully relate to and create positive pedestrian experience, provide wider footways and accommodate increased footfall.

402. While there are no conservation areas or listed buildings in the vicinity of the application site, the draft OKR AAP does identify buildings of townscape merit and architectural or historic interest nearby. Additional to this, the Christ Apostolic Church immediately to the south of the site is on the Council's draft list of Locally Listed Buildings. The draft AAP identifies the site as an appropriate location for a Tier 2 tall building of between 16 and 20 storeys, a Tier 3 building of up to 15 storeys, and a series of buildings reducing in height towards the south of the site.

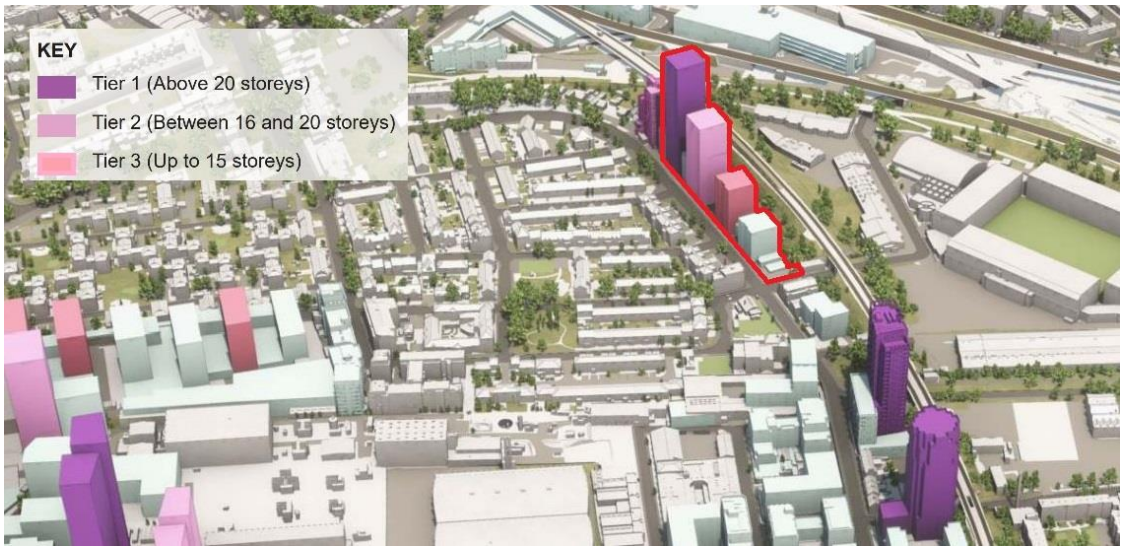


Image 66 *(above): The Stations and The Crossings strategy from the draft Old Kent Road AAP, showing the distribution of tall buildings across the eastern part of the action area, including on the 79-161 Ilderton Road site (edged in red).*

403. The site benefits from an extant permission, 23/AP/0387, for the construction of a housing-led development comprising a pair of buildings each formed of two blocks linked by a plinth/base element; the pair of buildings would be arranged around a central publicly-accessible open space. This is a material consideration when assessing the design quality of the 24/AP/3687 proposal. In particular the height, scale, and form of the 24/AP/3687 proposal are very similar to the extant consent.

Site layout and public realm

404. Having been previously used for the storage and sale of disused vehicles, the site contains no permanent structures or buildings, and the land is currently in an unkempt state. Consequently the site fails to offer a positive interface with, or activation in relation to, the public realm. More generally, this stretch of Ilderton Road currently lacks townscape legibility: the existing buildings on the western side are arranged inconsistently in relation to the highway, with many set back behind parking courtyards and high walls, and some presenting flank elevations to the street.

405. The linear arrangement of the four proposed blocks conforms to the guidelines given in the draft AAP, is a logical response to the long rectangular shape of the site, and would instate a strong urban edge to the eastern side of Ilderton Road. The siting of the publicly-accessible open space in-between the North and South Buildings also aligns with the site layout suggested in the site allocation. Cutting through the full width of the site, the Pocket Park would help open up views of, and create a strong visual link to, the vegetated adjacent railway embankment. All of these site configuration moves are logical and contextually responsive

406. In creating a new active frontage along almost the full extent of the site's 194 metre long Ilderton Road boundary, the proposal responds positively to the Southwark Plan requirement for non-residential uses to activate the street scene. This new active frontage would comprise:

- the extensive glazed façade of the PBCL lobby, which would wrap around the corner to front onto the Pocket Park;
- one flexible commercial unit within the North Building, positioned towards the northern end of Ilderton Road;
- one flexible commercial/community unit within the South Building, providing a glazed frontage onto Ilderton Road and a return frontage onto the Pocket Park;
- the glazed façade of the lobby to the conventional housing, located mid-wat along the South Building's Ilderton Road frontage; and
- a final flexible commercial unit within the South Building, fronting onto Ilderton Road and turning the chamfered corner onto a stretch of John Berylson Way.



Image 67 *(above): Ground floor layout of the proposed North Building, showing the commercial/community unit (in red) and the residents' reception and lobby for the PBCL (in orange) that together would create an extensive active frontage.*



Image 68 *(above): Ground floor layout of the proposed South Building, showing the commercial/community units (in red) and the residential lobby (in blue) that together would create a good active frontage.*

407. The proposed development would also bring widened pavements (from between 1.7-1.9 metres as existing to between 1.9-3.8 metres as proposed) and at-grade planting beds along parts of the Ilderton Road frontage. Along with the generously proportioned Pocket Park, which would deliver a significant net gain in public space and biodiversity, and additional greening and widened footways along John Berylson Way, the layout of the site would bring major public realm benefits. The Pocket Park is currently shown as being enclosed along its Ilderton Road boundary by a 2.0m high fence with 25% porosity. The park is proposed to be gated at night. Officers consider that the boundary enclosure should stand to a height of 1.5-1.6 metres maximum and should not be a predominantly solid structure. This would help with security, providing passive surveillance from the street into the space. During the day it would also make the park feel more like a truly public space. Having the park closed-off at night is understandable, but if it was located behind an essentially solid enclosure this would make it less secure. The design of the park's fencing will be secured by condition as will the opening hours.

408. Millwall Football Stadium is located close to the site with the main access into the ground being from John Berylson Way, which can give rise to high footfalls on match days. The ground floor layout and landscape of the proposal has

been designed in recognition of the close proximity to the football ground with the provision of wider pavement widths and the incorporation of commercial and community units at ground floor level facing the street.

409. Although a waste storage room has out of practical necessity been placed on the Ilderton Road frontage of the South Building, the length of façade it occupies has been minimised. A decorative pressed metal elevational treatment is proposed to help mitigate this short stretch of inactive frontage. Almost all other ancillary uses across the two buildings have been located within the rear part of the floorplan, accessed by residents either through the lobby or via safe access-controlled points of entry to the side of the buildings.



***Image 69** (above): Ilderton Road elevation of Block C, showing how decorative panelling would be used to dress the stretch of inactive frontage.*

410. In summary, the proposed site layout is well conceived, opening up the majority of the site's Ilderton Road and John Berylson Way perimeters with new active frontages. The legible entrances of these ground floor uses, and the broader extensive glazed frontage within which they would sit, would bring transparency to the base of the building. This, together with the generous new Pocket Park and greened footway, would ultimately making for a positive relationship with the public realm.

Height, scale, massing and tall building considerations

411. The application proposes a linear composition of four blocks, the tallest of which would rise to 29 storeys, with the remaining three cascading in height – from 23, to 16, to 10 storeys– towards the southern end of the site. The four blocks would rise from base/plinths of between 1 and 2 storeys. Blocks A and B would be separated by a distance of 14.8 metres (widening to 19.8 metres), Blocks B and C by 28.2 metres, and Blocks C and D by 18.2 metres.

412. The proposal broadly accords with the heights promoted in the draft OKR AAP, providing a Tier 1 and Tier 2 building on the northern half of the site, and a Tier 2 and a Tier 3 on the southern half of the site. In creating a stepped increase in height towards South Bermondsey station, the proposal would be beneficial in townscape terms and would ensure the most densely developed part of the site has the best public transport access. The lower elements of the proposal to the south take their scale references from the existing residential buildings lining the western side of Ilderton Road, and are not dissimilar in

scale to the recently-constructed buildings further to the south along Ilderton Road.

413. Although Block A is proposed to be 28 storeys rather than the consented 26 storeys, this would equate to an increase in height of less than 3 metres. This has been made possible by Tide's volumetric system, which through deeper transfer slabs at the podium levels allows for slimmer floor build ups while retaining generous floor to ceiling heights.

414. Although Block B would be appreciably taller than its counterpart in the consented planning application (a difference of approximately 13 metres), the podium level between Blocks A and B would be lower (two storeys rather than five) than the counterpart podium. This does to an extent lend a greater sense of slenderness to Block B and in this regard provides some mitigation for the increased height.

415. Well-sized gaps would intersperse the four blocks, with the sense of separation emphasised by podium- and ground-level greenery, guarding against any visual coalescence when viewed from a distance. The relative heights of the blocks and their distribution across the site is logical and responds appropriately to the context, while also providing a successful 'frame' to the generous new centrally located publicly-accessible open space. Furthermore, as a consequence of the taller blocks being placed on the northern half of the site, the Pocket Park would benefit from optimised sun-on-ground penetration.

416. With regard specifically to massing, the South and North Buildings would possess a strong urban character and streetscene confidence, with principal frontages set close to the line of the footway. The configuration of the two buildings as paired 'blocks' linked by a set-back podium is effective in breaking down the mass and bulk of development, helping it to read as a sequence of tall and more slender elements, brought together into two pairs.

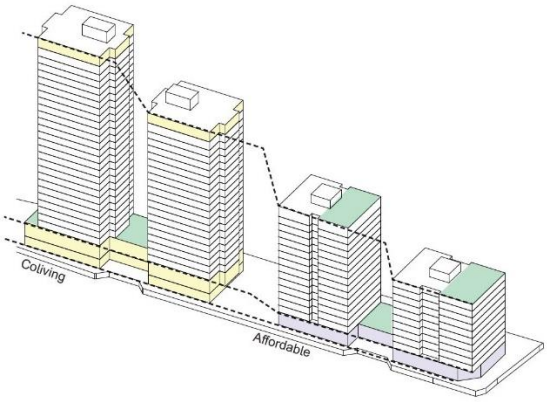


Image 70 *(above): Strategy for articulating the massing, with regular steps down and a top-middle-base structure.*

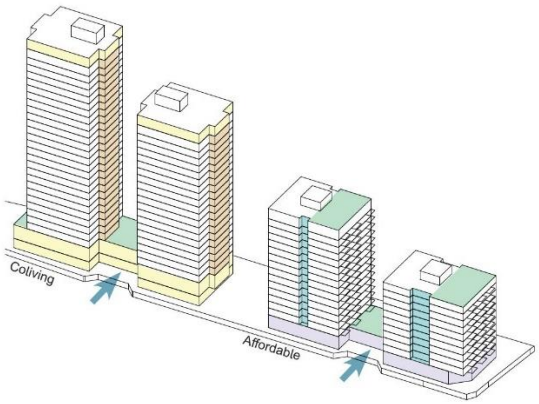


Image 71 *(above): Strategy for the elaboration of the facades, rooftops, and entrances.*

417. As the above diagrams demonstrate, the floorplate of Blocks A, B, C and D would be faceted along two of the edges. In the case of Blocks A and B, the projecting wings would be on the north and south elevations, whereas on Blocks C and D recesses would feature on the east and west facades. This would produce a dynamic interplay between the South and North Buildings in both short- and long-range views. The above-ground communal amenity storeys at Blocks A and B, which would be of an accentuated height, and expressed using double- and triple-width modules containing a higher percentage of glazing, would help refine the massing of these blocks. Elaboration, complexity and relief would be brought to the form of Blocks C and D through a mix of:

- projecting balconies on the north and south facades, with a single centralised recessed balcony on the east and west facades:
- a pronounced masonry lip distinguishing every two storeys; and
- a chamfered ground floor corner on the southwest corner of the building, with a circular pillar supporting the floors above.

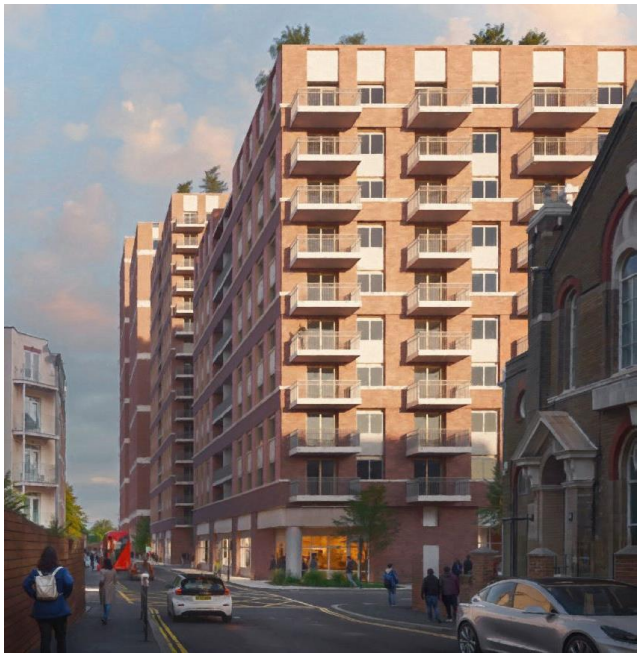


***Image 72** (above): View looking north along Ilderton Road, showing how the four blocks would read as a family, but with A and B subtly differentiated from C and D.*

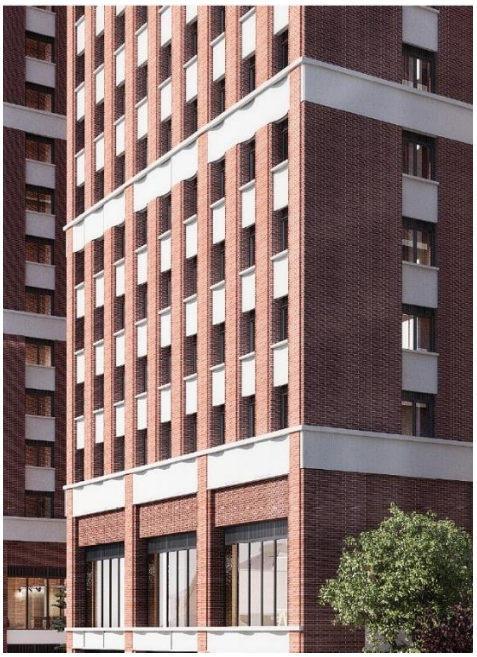


***Image 73** (above): View of the North Building, showing the careful modelling of the gridded facade.*

418. With regard the façade designs (a detailed assessment of which is given in a later part of this report) the verticality and repetition of the regular module would create a functional composition that reinforces the strongly rectilinear massing of the four blocks. In medium- and long-range views, strong masonry spandrels and parapets would break down the form. In closer views, small exceptions to detailing, such as occasional stringcourses and spandrels at Blocks A and B that continue around the edges of the building and break up the otherwise vertical columns of brick, would engage the eye and moderate the regularity of the form.

419. With regard to the tops of the buildings, the communal amenity facilities on the uppermost floors of Blocks A and B would be exaggerated by the brickwork enclosure above. A non-stepped masonry parapet would wrap the full perimeter of these two roofs, helping both blocks terminate cleanly against the sky. Differently to Blocks A and B, the massing of Blocks C and D steps-up by one storey across a portion of the footprint to house rooftop plant. The lower storey would be open to the air and expressed as a series of glazed bays framed in masonry. Aside from lending lightness and transparency to these lower blocks, this roof-level portico would emphasise the concept of the four towers stepping-down from north to south. The effect, which is a design characteristic carried through from the consented scheme, is considered to be successful.



***Image 74** (above): Visualisation of the development showing how the North Building would be differentiated from the South Building through its architectural composition and crown treatment.*

420. As assessed in detail in a subsequent part of this report, it is not considered that this proposal, due to its height or scale, would result in any harm to designated London wide or local protected views.

421. In concluding on height, massing and scale, it is important to note that the arrangement of four tall blocks stepping down in height from north to south is very similar to the extant permission, as is the individual height of three of the blocks (A, C and D). While these parallels should be borne in mind, it must also be recognised that all four blocks would be of broader proportions in this planning application than in the extant scheme, and that Block B would be markedly taller than its counterpart. To some extent, however, this slightly

greater bulk is mitigated by the more equitable distribution of the four point blocks across the length of the site. The lower height of the podiums compared with the counterparts in the extant scheme helps to reduce the blocks' increased breadth, lending them slightly more visual slenderness. On the whole, the four blocks would cohere as a grouping in most short-, medium- and long-range views in a broadly similar way to the consented scheme. The similarities to the extant scheme should be given significant weight in determining the suitability of the height, mass and scale of the 24/AP/3687 proposal.

422. With regard to policy compliance with London Plan Policy D9 and Southwark Plan Policy P17, the following aspects are of consideration:

Landscape contribution

423. The development includes additional public open space on-site and a number of significant improvements to the public realm locally, including numerous new trees. These are considered to be commensurate with the scale of development.

Point of landmark significance

424. The site, being very close to South Bermondsey Overground Station as well as a potential major regeneration site at the Surrey Canal Triangle, is considered to be within an area of landscape significance. The development will create a wayfinding node for the station and, together with the Surrey Canal Triangle redevelopment, will from part of a cluster of tall buildings helping to establish the area around the Millwall Football Club as a local destination.

425. While the site's landmark significance is not of the same order as sites at the heart of the Opportunity Area and within the Old Kent Road District Town Centre, its location nevertheless has some significance being situated on one of the principal routes through the Opportunity Area. In stepping down towards the lower scale industrial environments to the south and residential environments to the west, the proposal would help manage the transition in scale from the taller consented buildings on the Surrey Canal Triangle site. The height of the buildings is considered appropriate for this area.



Image 75 *(above): View looking northwards from the junction of Ilderton Road and Surrey Canal Road, showing the proposed development in the centre background, behind the five-storey Atar House development, and providing a marker for South Bermondsey station.*

Highest architectural standard

426. The proposal would be a high quality new-build scheme, incorporating a pallet of robust and rich facing materials, brought together into a refined and striking architecture through careful detailing. It would deliver high-performance conventional and PBCL housing as well as commercial floorspace. The scheme is designed to achieve an excellent BREEAM rating. The architecture itself is well considered.

Relates well to its surroundings

427. At ground floor level –where large framed glazing and principal entrances to the housing and flexible commercial units are proposed– the scheme would concentrate the active frontage and main entrances along the Ilderton Road frontages and around the new public space at the heart of the site.

428. The proposed development responds positively to local character and makes a strong and positive contribution to the townscape through the optimisation of a vacant site with no townscape merit, and the delivery of a building of exemplary design quality. In addition, the materials palette, which is predominantly brick, is reflective of the industrial and residential vernacular of the local area.

Positive contribution to the London skyline

429. The development would form part of a cluster of emerging large-scale buildings centred on the Mlllwall Football Club. The site also stands adjacent to the railway line, which is flanked by a number of recently-constructed tall

buildings southwards towards the Old Kent Road high street, reflecting the intended densification of the wider Old Kent Road area, being a designated Opportunity Area.

430. The cumulative impact has been assessed as part of the applicant's HTVIA, which includes consideration of the proposed development within the cumulative context of existing proposed future developments and planning consents. The HTVIA demonstrates that the scale, form and massing of the development would be congruent to the existing and emerging context. By reason of the proposal's careful massing and engaging architectural treatment, its skyline contribution would be positive.

Free-to-enter publicly-accessible areas

431. The application proposes a Pocket Park, to be located centrally on the site at ground level, covering an area of 738 square metres (24 square metres of which would be under a building canopy). This is commensurate in size with a publicly-accessible open space proposed by the extant scheme. In addition to the Pocket Park, there would be widened footways supplemented by planted beds. There would also be two forecourt areas, one in front of each residential lobby, which would contain come soft landscaping. In light of this, the total quantum of new publicly accessible realm created by the redevelopment would be commensurate to the height of the proposed tall buildings, and should be treated as a significant benefit of the scheme.

Mitigated environmental impacts

432. As part of the consideration of tall buildings' suitability, the London Plan requires interrogation of wind, daylight, sunlight penetration, air quality, noise and temperature conditions around the building(s) and neighbourhood. It expects these not to compromise comfort and the enjoyment of open spaces around the building. Other parts of this report assess these matters comprehensively, and conclude that with mitigation secured, there would be no harmful environmental impacts.

Conclusion on massing, height, scale and tall building considerations

433. In summary, although the heights of the taller proposed blocks would mark a step change in the scale of the immediate area's built form, the proposal as a whole is in line with the draft AAP height strategy for this site.

434. In delivering 865 PBCL units, 186 conventional dwellings and nearly 400 square metres of commercial space while seeking to make efficient use of the land, the proposed development inevitably produces substantial forms. Notwithstanding, the scale and massing of the proposal has taken account of the site's setting, orientation and immediate context, while also having regard to the importance of strengthening the Ilderton Road streetscene and providing a major new publicly accessible space on site. The set-back and low-rise podia, the distinctly expressed 'top-middle-base' composition, the

accentuated detailing to the lower floors, and the strong crowns to all four blocks will make for a composed and refined family of buildings.

435. Overall, and having taken account of the effects arising cumulatively with other existing, consented and planned tall buildings nearby, the development's design meets the policy criteria for a new tall building. However, a significant outcome of a tall building is its visibility and while this is not harmful in itself, the potential effects on the 'receptor' townscape and heritage assets need to be considered. These are discussed in later parts of this 'Design' section.

Architectural design and treatment

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

437. Key elements underpinning the architectural treatment of the North Building are:

- references to the industrial vernacular (for example, by using the textured metalwork panelling where glazed frontages cannot be provided);
- on the lower storeys, concave lintels to support the projecting pilasters and to mark the double- and triple-module bays; and
- pilasters in a lighter tone than the main body of the building to add depth and emphasise the facade 'layering'.

438. The North Building's material palette would be formed principally of red brick in two tones, contrasted by stone-coloured aluminium panelling. Window and doors would be framed in dark metal, finished with stone-effect cills.

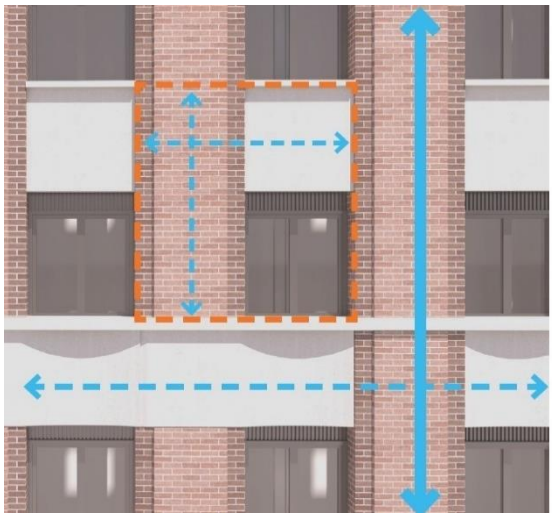
439. Key elements underpinning the architectural treatment of the South Building are:

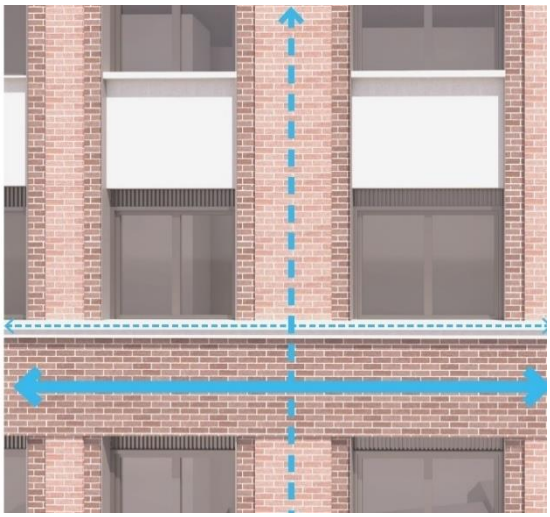
- a mix of brickwork and stone-effect aluminium to create a consistency of pallete with the North Building;
- a rectangular façade module with a window of elongated proportions to achieve a more domestic feel, and to respond appropriately to the internal layouts; and
- base and crown expression with full height glazing, framed by brick piers and beams.

440. The South Building's proposed material palette is very similar to the North Building's, with brickwork proposed in two hues of red, the darker tone being applied to the recesses/reveals and the thick horizontal banding on alternating storeys. Window and doors are to be framed in dark metal, finished in stone-effect cills. The grey spindle enclosures to the majority of the South Building's

balconies would provide a refined secondary layer of detailed metalwork. The masonry of the balcony fascias would wrap underneath onto the soffit, ensuring a consistency to the materials palette when the building is seen in views ‘upwards’ from the street level.

441. The materials shown indicatively at this stage are high quality and robust, such that officers have confidence the appearance and architectural integrity of the building would be sustained through its lifespan.





Images 76 and 77 *(above left and right): Bay studies of the North Building and South Building modules, showing how they compare. While materiality is unified across the two buildings differences in the horizontal banding and fenestration are proposed.*

442. The ground floor frontages have been designed to frame a vibrant public realm, with the highest level of detail and finishes applied at the base levels and entrances, for both the residential and non-residential uses. Simple but effective detailing and relief, as well as contrast in colour and material, create a ‘middle’ to each of the four blocks that is expressive yet composed. With respect to the tops of the buildings, these would be emphasised by the double-height crowns at Blocks A and B, while at the two shorter blocks an exaggerated one-storey high enclosure is proposed. These treatments would be successful in imbuing the building with a clear hierarchy of ‘base’, ‘body’ and ‘top’.

443. To ensure the proposed buildings provide active frontages, the application proposes a number of flexible commercial/community units at ground floor level. The submission includes detailed elevations illustrating how the shopfronts would respect the regular bay arrangement of the host block, and would be dressed with masonry-effect lintels. At the North Building, these lintels would take a concave form, while at the South Building these lintels would be flat, lending subtle differentiation.

444. The character and strength of the proposed buildings relies on their relative simplicity with a calm and consistent approach to the facade modelling, material choices and colour contrast — all of which would ensure the legibility

of the development from all distances. The proposal would have a distinctive identity within the Hatcham and Ilderton neighbourhood, but one that emphatically references the industrial character of the area, all without appearing discordant among the nearby buildings, including those recently consented and under construction further to the south.

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

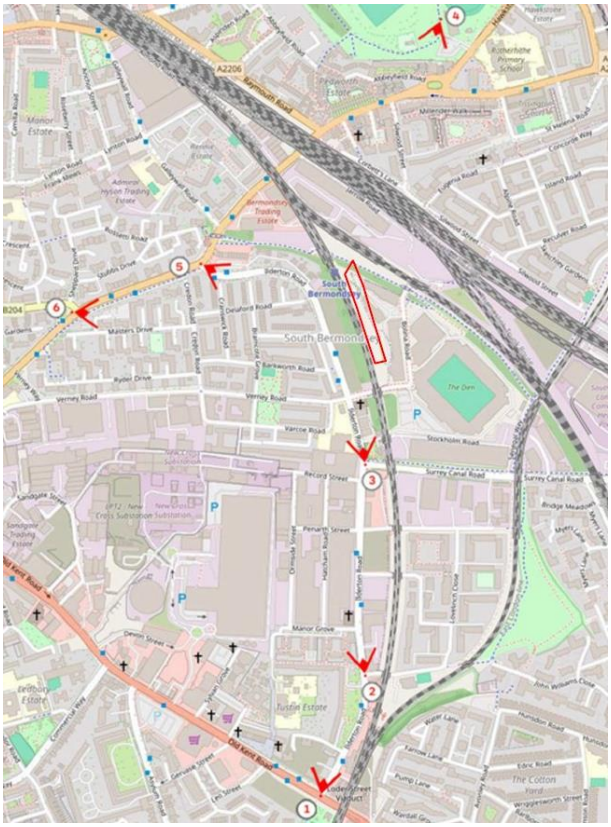
446. Large scale bay studies have been provided with the submission to demonstrate design quality. Notwithstanding, a full set of detailed drawings will be secured by condition to ensure the delicate qualities and depth of the facades depicted in the application-stage drawings materialise in the as-built scheme. A full scale mock up of the panels on the towers will also be required to be built on site and approved by condition.

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

Heritage and townscape impact

448. A Heritage Townscape and Visual Impact Assessment (HTVIA) has been submitted in support of this application. The study area for the HTVIA is a 500 metre radius from the site, which was informed through discussions with planning officers. No conservation areas or listed buildings fall within this radius, but multiple buildings on the draft local list do.

449. The 'townscape' element of the HTVIA considers the impact of the proposed scheme from six different viewpoints in the surrounding area, and includes consideration of cumulatives. The draft locally listed buildings mentioned above are located within the 500 metre radius, but neither are visible within the views.


A2206
Rotherhithe Primary School
Manor Estate
Lytton Road
Admiral Hyson Trading Estate
Bermondsey Trading Estate
Ilderton Road
Crimsworth Road
Crimsworth Primary School
Crimsworth Road
Masters Drive
Verney Road
Varcoe Road
Record Street
Penarth Street
Manor Grove
Surrey Canal Road
Stockholm Road
The Dam
Bridge Meadows
Old Kent Road
Tustin Estate
Ledbury Estate
Cottimore Lane
Pump Lane
Rolt Street
Rolls Road
Abbeyfield Road
Commercial Way
Lower Road
Rotherhithe Tunnel
Southwark Park Road
Bermondsey Street
Tower Bridge Road
Jamaica Road
Bermondsey Wall West
Bermondsey Wall East
Rotherhithe Tunnel
Rotherhithe Tunnel Ventilation Shaft
Rotherhithe Tunnel Ventilation Shaft
Rotherhithe Tunnel Ventilation Shaft

Townscape views

450. 16 consented and under-construction planning permissions were included in the cumulatives model, as shown in the below image:



Image 79 *(above): Cumulatives model, in which the site is visible towards the left hand side of the image (shown in grey), with each 'cumulative' numbered.*

View 1 - Looking north from the southern side of the Old Kent Road at its junction with Ilderton Road

451. The proposal would not be visible in this view in either the summer or winter.

View 2 - Looking north on Ilderton Road at its junction with Canterbury Industrial Estate and Hornshay Street

452. In this view, most of the proposed development would be hidden behind intervening built environment. The main visibility would be a distant view of the top floors of the two tallest towers behind the existing, dark grey brick elevations of Argo House. The material palette (with brick predominating) and level of detailing proposed would ensure that the building sits comfortably in the far distance. Due to the quality of the architecture proposed, the development would enhance the view as well as provide a wayfinding marker for South Bermondsey Station.

View 3 - Looking north at the junction of Ilderton Road and Surrey Canal Road

453. The proposed view shows the proposal in the far distance behind the modern development already constructed on the western side of Ilderton Road. It also shows the relationship between the proposal and the Ilderton Road Primary School. Similar to the previous view, the use of brick and the quality and variety of detailing means that the proposed development would sit comfortably within the context of other brick buildings –particularly the primary

school– reflecting the materiality of the historical townscape. The tower would provide a marker for the station and the quality of the architecture positively enhances the view.

View 4 - Looking to the south from Southwark Park

454. In this view the proposed development can be glimpsed behind the trees to the right of the image. This view shows that even in winter the proposed development would have limited visibility beyond the mature trees and existing urban form that surrounds the Grade II registered Park.

455. In the cumulative scenario, the proposed development would play a role in increasing the impression of built development in the park's hinterland and speak of the vibrant new townscape beyond. However, by reason of the sheer distance between the proposed development and the park, as well as the tree cover, there would only be a small difference to the ability to understand and appreciate the historic context or townscape setting.

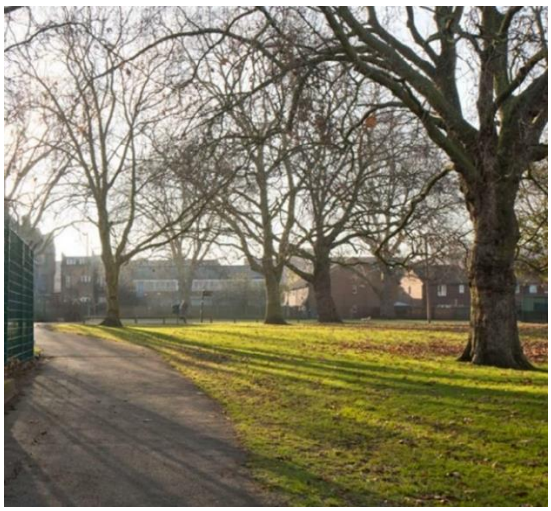


Image 80 *(above): View 4, during the wintertime, in the existing condition.*

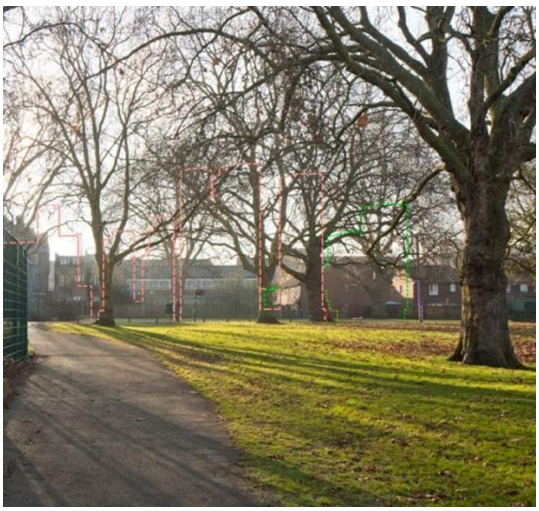


Image 81 *(above): The same view in the 'proposed plus cumulatives' scenario (proposal is dashed green).*

View 5 - Looking west from the junction of Ilderton Road and Rotherhithe New Road

456. The proposed development would appear centrally in this view, stepping down to the north and south. It would provide one of the best positions to fully appreciate the quality of the detailing, materials and form of the buildings. It would also provide a key marker for South Bermondsey station and serve as a symbol of the area's regeneration. In relation to the Travellers' site, it would provide a high quality backdrop, with the North Building stepping down from 29 to 2 storeys on the boundary in order to provide an intermediary and transitional block between the tower and the single storey Travellers' homes.

457. When having regard to the planned regeneration in the area, which includes the Surrey Canal Triangle redevelopment (Phases 2-5 outline), the cumulative

condition would lessen the effect of the proposed development by itself, as it would then be seen with the backdrop of significant tall development covering a wide area beyond the railway embankment.



***Image 82** (above): View 5, during the summertime, in the existing condition*



***Image 83** (above): View 5, during the summertime, in the 'proposed plus cumulatives' scenario.*

View 6 - Junction of Catlin Street and Rotherhithe New Road

458. The view is dominated by the road in the foreground and the mature street trees. These elements, even in the winter view, provide considerable visual screening between the viewing position and the site such that the proposed development, in both winter and summer views, would have a minimal townscape effect.

Borough views

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

London Strategic views

460. The London View Management Framework (LVMF) (March 2012) identifies a number of strategic views that are sensitive to change, and require careful management if they are to be protected and enhanced. The types of strategic view are: London Panoramas; Linear Views; River Prospects; and Townscape Views.

461. With regard specifically to the London Panoramas, for those where the viewpoint is located in north London, the view splay takes in a wide panorama of the city centre and Southwark forms a distant backdrop to these views. These views are: Alexandra Palace (View 1), Parliament Hill (View 2), Kenwood (View 3), and Primrose Hill (View 4).

462. The viewpoints mentioned above are all located at a distance of 9 kilometres and farther from the subject site. The changes to the visual character of the townscape and views resulting from the proposed development would not be discernible in the backdrop to the City and are at such a distance as to have

no bearing on the silhouette of key City landmarks, blending into the general urban context.

463. The site does not fall within any of the Linear Views or River Prospects.

464. With regard to the Townscape Views, only one is sensitive to development at the 79-161 Ilderton Road site. This is View 23A.1 (from the bridge over the Serpentine, facing east towards Westminster), the Wider Setting Consultation Area of which the site sits 1.6 kilometres beyond. The visibility of the proposed development has been tested; it would not be in any way visible in the view.

Non-designated heritage assets

Former Baptist Church, 163 Ilderton Road:

465. The proposed development mediates positively towards this locally listed building, as the southernmost block (Block D) would be the lowest of the four, at 10 storeys in height. The proposal would block some views of the asset potentially achievable from the platforms of South Bermondsey Overground Station, but these are not the principal experiences of the Church, and therefore have limited impact on the building's significance. Overall, the significance of the Church would not be harmed by development within its setting, as proposed in this application.

209-225 Ilderton Road:

466. The proposed development would be partly visible in the backdrop to this terrace of nine two- and three-storey buildings, but only when the terrace is viewed obliquely as part of a northwards view along Ilderton Road. With the cumulative effect of the consented 25-storey development at Ilderton Wharf also appreciable –and more dominantly so– in this view, the proposed development would not feature conspicuously. Rather, it would form part of the urban backdrop to these locally listed buildings, with a neutral effect on their significance.

Penarth Centre:

467. Although from certain viewpoints the proposal would be visible as part of the backdrop to the Penarth Centre, this townscape backdrop is already formed of numerous tall buildings, and as such the proposal would not figure in this backdrop obtrusively or discordantly. For these reasons, the proposal would have a neutral impact on the setting of this two storey 1950s light industrial facility.

Former public house 58 Bramcote Grove:

468. Only in views eastward along Barkworth Road, would the proposal be visible in then same context as the former public house. However, this visibility would only be as part of the wider (not the immediate) backdrop of the former public house. Principal views of this locally listed building are not eastward along

Barkworth Road; they from the southwest, facing towards the pub's chamfered corner. As such, the proposed development would have very limited impact on the building's significance.

Conclusion on heritage and townscape impact

469. The closest conservation areas and listed buildings are all located more than 500 metres from the site, and therefore their special character would not be affected by the proposed development. With regard to buildings on the Council's local list that are located sufficient nearby to be sensitive, these would not be adversely impacted by the proposed development, the impact on their significance being within a range of 'neutral' to 'limited'. For these reasons, the development would comply with Policies P19, P20 and P26 of the Southwark Plan.

470. In conclusion on townscape impacts, the proposed development would not have any impact on the designated London and Borough views. In respect of the six local townscape views, the impact is not considered to be harmful. Indeed, in many views it is considered to be beneficial.

Conformity with the Hatcham and Ilderton Roads Design Code

471. As mentioned in the introductory parts of this report, the site is located within the area covered by the Hatcham and Ilderton Roads Design Code, which sets targets and aspirations applicable to all new development within this part of the Opportunity Area. Although the Code is only a draft guidance document at present because the AAP is not yet adopted, the applicant has designed the proposal to meet most of the principles of the Code. An example from each of the themes is provided below:

- Sustainability: A simple/ compact building form with a minimised form factor;
- Nature: In the play and open green spaces, clear and multi-stem trees in a range of 'medium' and 'large sizes, and with various shape canopies, have been proposed;
- Movement: Widened footways would be provided, framed and activated by active ground floor frontages;
- Public Open Space: Safe, communal areas with good shelter and resting places are proposed (part of the rationale behind this being to combat social isolation and loneliness, enabling communities to meet, socialise and integrate);
- Identity and Character: Proposed fenestration and materiality have been designed to express the function they enclose (larger openings allow natural light to penetrate deeper business units, while the residential units would be served by domestic-sized openings);
- Land Use: Ground floor commercial units would be designed to achieve a minimum 4 metre clear height to the underside of the ceiling; and
- Homes: The quality of design, materials and shared communal spaces are consistent across all tenures.

472. The effort made by the applicant to embrace the principles of the Design Code, in turn helping to clearly define and enhance the unique character of the area, is welcomed. It is also in accordance with the broad objectives of Southwark Plan Policies SP2 and P15 in seeking to enhance local distinctiveness and deliver the highest quality urban design.

Inclusive access

473. Policy D3 of the London Plan states that measures to design out crime should be integral to development proposals and be considered early in the design process. Developments should ensure good natural surveillance, clear sight lines, appropriate lighting, and logical and well-used routes. Policy P16 of the Southwark Plan reinforces this and states that development must provide clear and uniform signage that helps people wayfind and effective street lighting to illuminate the public realm.

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

- all surfaces at a gentle gradient and surfaced in slip-resistant treatments;
- all uses to have step-free access through the provision of ramped or lift arrangements;
- colour contrast to be provided to denote level areas from those with a gradient;
- reflective surfaces, internal finishes and lighting levels and sources to be designed to reduce disturbance for people with sensory disabilities;
- manifestations to glazed doors and windows where necessary;
- lift access to be provided to all levels within the building, with all lifts to include tactile information, audible announcements and adequately sized landing space;
- cycle storage provision to allow for larger cycles such as cargo cycles, purpose built cycles for disabled people and tricycles; and
- signage to be clear, legible and consistent (pictograms will be used wherever possible).

475. The proposal is ambitious in its inclusive design principles creating a convenient and welcoming building and new public spaces that can be entered, used and exited safely, easily and with dignity for all.

Designing-out crime

476. Policy D11 of the London Plan and Policy P16 of the Southwark Plan require development proposals to reduce opportunities for crime, and create and maintain safe internal and external environments.

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

- creating well lit routes and spaces with good sight lines, creating opportunities for natural surveillance in so doing;
- designing-out alcoves, secluded areas and other spaces for anti-social behaviour;
- designing all cycle store room to be open-plan, well-surveilled and secure; and
- in the PBCL, providing an access control point (secures line) before entry into the circulation spaces.

478. The Metropolitan Police's Secure by Design Officer has assessed the proposal and is confident that certification can be attained. To ensure certification is ultimately achieved, the imposition of a two-part 'Secured by Design' condition is recommended.

Design Review Panel

479. In compliance with the requirements of London Plan Policy D4, the proposals were subject to a multiple-stage design scrutiny process from planning, urban design and conservation officers. This scrutiny process ran throughout the pre-application phase and the planning application stage. Examples of how the scheme's design was positively progressed through collaboration with officers include:

- refining the massing of the both buildings;
- developing the architecture (including the crowns treatments and base storeys, as well as the compositional order) to lend a greater sense of verticality to the North Building and a stronger horizontality ot the South Building;
- the optimisation of the Ilderton Road frontage for active uses;
- developing the residential accommodation to provide optimised mix and quantum of housing, and optimal layouts;
- thinking more closely about the quality of the internal amenity facilities within the PBCL, including how spaces such as corridors could be made to feel more welcoming/personal and foster impromptu interaction between neighbours; and
- re-configuring the landscaping across all proposed public open spaces and communal amenity spaces.

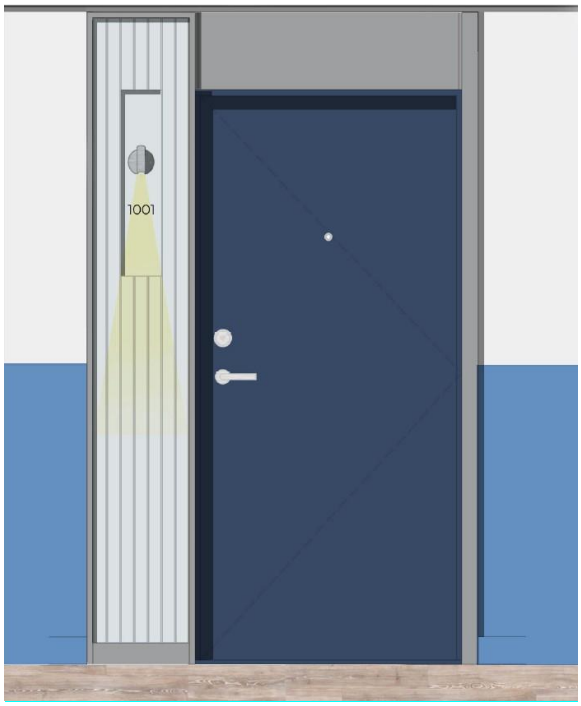


***Image 84** (above): The applicant's emerging proposals for personalisation of entrance doors to PBCL studios, to include downlit door numbers.*



***Image 85** (above): The applicant's illustrative materials palette for different elements of the communal corridors within the PBCL.*

480. The proposal was subject to the scrutiny of the Old Kent Road Community Review Panel, the feedback from which is detailed in a later part of this report (along with an officer response to each item). Officers are satisfied that the requirements of Policy D4 have been met.

Conclusion on design

481. This is a carefully conceived scheme providing a pair of engaging buildings of an appropriately urban character, set within new high quality public realm sized commensurately to the scale of the buildings.

482. With regard to the height and massing of the proposal, the extant planning permission (23/AP/0387) is important because it establishes in principle the acceptability of four blocks arranged in a linear formation, stepping-up northwards to a maximum height of just over 90 metres AOD. An additional consideration is that the application site is situated within an opportunity area and a location where tall buildings are considered to be appropriate. With the height of three of the blocks (including the tallest of all four blocks) being very similar to the extant permission, and having been carefully tested in the townscape views, it is concluded that the proposed development would neither appear overly dominant nor harm important aspects of the local townscape character. It would achieve high quality architecture and relate well to surroundings at the ground floor level. Overall, the height, scale and massing of the proposal can be accommodated without undue harm to the established townscape.

483. Blocks A and B would share a common architectural language, as would Blocks C and D. Intended only to be subtle, the differentiation between the two pairings would be achieved through variations in the fenestration and elements of the architectural composition. Notwithstanding these differences, a strong rhythmic quality would run through the development as a whole, with features common to both buildings being articulated window surrounds, string courses, and the use of warm and tactile brickwork. Throughout, robust and high quality finishes are proposed. To ensure high quality execution, sample materials, detailed section drawings and mock panels will be required by condition.

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

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

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

Public realm, landscaping and trees

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

488. As set out in the draft OKR AAP, all new development must deliver 5 square metres of public open space per proposed dwelling. As prescribed by the draft AAP indicative masterplans, sites are identified as providing public open space either:

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

489. In scenario b), the total quantum of on-site public open space proposed by the planning application can be deducted from the 5 square metre per dwelling financial contribution requirement. Where a site is required to make a public open space financial contribution, the £205 per square metre tariff specified in the Council's S106 and CIL SPD should be applied.

On-site public open space

490. As mentioned in the ‘Details of proposal’ of this report, the proposed development incorporates a single centralised on-site public open space. This is the 738 square metre Pocket Park. As the ‘Young People’s Play Space’ part of this report has already explained, the Pocket Park would incorporate play facilities that would be available to the resident children as well as young people from the wider neighbourhood

491. The concept for the Pocket Park is for a richly planted and intimate space framed by numerous trees, of which eight are to be large-scale specimens to give the environment an established quality from first opening. Strong lines of evergreen and sensory planting would create ‘rooms’ with different play opportunities, including a swings, wheeling paths, a play bridge, and table tennis. There would also be a requirement for wet and sand play as per policy AAP9 ‘The Greener Belt Strategy’. Alongside the play function, the Pocket Park would provide formal and informal seating, including a raised platform at the centre of the space, where older children and adults can meet and dwell. The design principles and general configuration of the space are well thought through, with an appropriate materials palette and a good mix of hard and soft surfaces.

492. A perforated steel screen would separate the Pocket Park from Ilderton Road. The design, inspired by botanical forms, is intended to provide visual links between the street and the garden, while also providing mitigation against winds at pavement level. The design would also integrate two controllable gates, one at the northern end and one at the southern end, for night-time use and for occasional use to manage access from the street into the garden. As mentioned in an earlier part of this response, while the principle of the fence and gates are acceptable, the fence design requires refinement, which will be dealt with by planning condition.

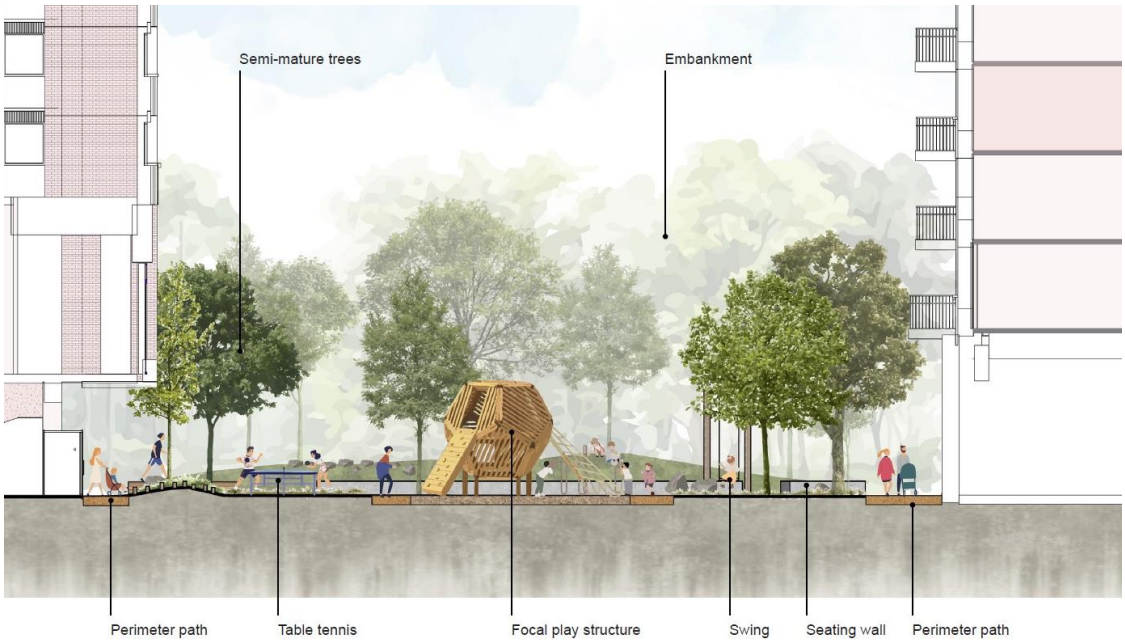


***Image 86** (above): Indicative north-to-south cross section through the Pocket Park, showing the extent and density of tree and planting cover.*

493. A final consideration in respect of on-site public open space is whether the Pocket Park would achieve good levels of sunlight penetration. The DSO report submitted with the application demonstrates that, in the current-day context, the Pocket Park would receive at least 2 hours of sunlight on 21 March to 83% of its area, therefore comfortably meeting the BRE target (50% for 2 hours of the day when measured on the Equinox). This can be seen in the image on the right, where the area exposed to sun-on-ground is depicted in yellow.

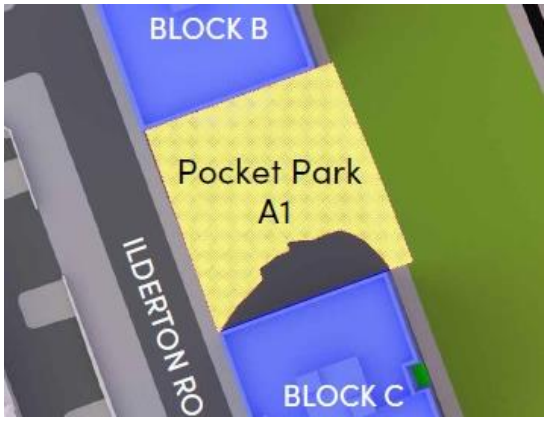


***Image 87** (above): Sun-on-ground analysis of the Pocket Park (the area in yellow would achieve at least 2 hours of coverage on the Equinox).*

494. The 738 square metres of dedicated publicly-accessible open space meets the aspirations, in terms of quantum and distribution across the site, of the Southwark Plan and draft AAP allocations. Final design and management details will be secured through a combination of planning conditions and Section 106 obligations.

Off-site (Old Kent Road Opportunity Area) public open space

495. The proposal hereunder consideration would deliver the equivalent of 474 dwellings, producing a requirement for 2,370 square metres of public open space. The 474-equivalent dwelling yield is calculated as follows:

- one third of the 865 PBCL units (rounded to the nearest whole number, which is 288); plus
- the 186 conventional homes.

496. The planning application would provide 738 square metres of on-site publicly-accessible open space; however, because 24 square metres of this would be located under a cantilever, it must be subtracted from the 738 square metre total. When the residual (714 square metres) is subtracted from the 2,370 square metres required by the draft AAP, the quantum not provided on site is 1,656 square metres. Applying the £205 multiplier, this generates an in-lieu contribution of £339,480, which the applicant has agreed to pay prior to implementation. These monies could go towards repaving the asphalt pavement on the western side of Ilderton Road to include tree planting; this would help to reduce air and noise pollution, achieve greenfield run off rates, and encourage habitat creation.

497. The extant planning permission secured a contribution of £25,000 towards the ongoing maintenance of a close-by public space, Pat Hickson Park, located

very approximately 100 metres to the south of the site. This contribution was required in recognition of the increased use of the park by the future residential occupiers of the development, as well as the employees of the proposed commercial units, some of whom are likely to eat lunch in the park.

498. It is considered appropriate for the new proposal hereunder consideration to, as per the extant planning permission, make a contribution towards the ongoing upkeep of Pat Hickson Park. Accordingly, £25,000 is to be secured in the 24/AP/3687 Section 106 Agreement. The monies will only become available for usage by the Council's Parks Team once current maintenance responsibilities (which fall to Network Rail) cease in mid-2026. This will precede the opening of the 79-161 Ilderton Road development by twelve to eighteen months.

Public realm adjoining the site

499. Small areas of extended footway around the base of the building would be delivered as part of the proposed development, all of which would be finished in materials consistent with the adopted footway so that the ownership line would be imperceptible. These widened sections of footway would be offered up for adoption once constructed. A number of at-grade beds, some incorporating trees, are proposed alongside sections of the footway, helping to green the street. This would all make for a more pleasant and spacious pedestrian experience.

Landscaping

500. The planting design aims to create a distinct garden character to the different parts of the development: the 'playful by nature' Pocket Park where children are brought into contact with nature, the Ilderton Road frontage, the 'wilder' east edge, and the rooftop gardens.

501. Typically, the Pocket Park planting would be shade tolerant and robust to enable them to thrive under the trees and within the play space. The Ilderton Road frontage planting would be drought tolerant and sun-loving, similar to the rooftop planting. The mixes proposed, which are indicative at this planning application stage, contain a significant amount of evergreen planting to help provide a degree of wind mitigation to the different spaces and year-round structure.

502. The landscaping proposals are considered to be locally specific and mindful of climate change, with the indicative specification having appropriately privileged species for their hardiness and minimal maintenance needs. Through planning conditions, the applicant will be required to install the soft landscaping to the agreed specification and maintain it in the long-term. Its enduring positive contribution to the greening of the site and local area can therefore, be assured.

Trees

503. There are presently no trees within the red line boundary of the site.

504. The applicant's Tree Survey and Arboricultural Impact Assessment identifies 20 arboricultural features on land adjacent to the site: 17 individual trees, 2 tree groups and 1 area of scrub. Of the 17 trees, a self-seeded Category U Sycamore, "T1", is earmarked for removal. All other trees would be retained, but their canopies are to be reduced to facilitate the development. None of the trees are subject to a Tree Preservation Order (TPO). All of the trees are located on Network Rail operation land, with dispensation for works, including tree removal under the remit of maintenance of nationally important infrastructure. The removal of T1 and the pruning works to the remaining trees would have no negative impact on amenity. The Council's Urban Forester has appraised the Arboricultural Impact Assessment and Method Statement, and has deemed them acceptable.

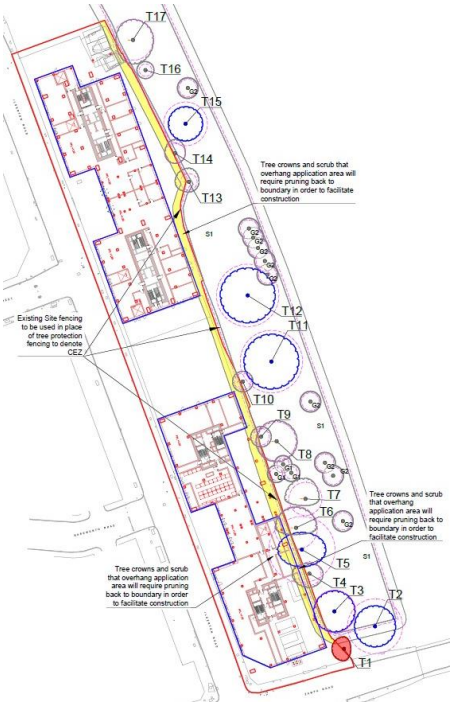


Image 88 *(above): Arboricultural plan, with T1 shown in red.*

505. This planning application proposes to plant a total of 39 new trees within the red line boundary of the site. The indicative details suggest that a variety of native species and tree sizes would be included. Although the tree selection at this stage is indicative only, the applicant envisages a mixture of fruit trees, pine, oak, redbud, mapel and alder at ground level with a good distribution of species, genera and family groups so that no one species is dominant. A mix of fast and slower growing species with a range of carbon storage potential is proposed. The detailed drawings show tree canopy extents at maturity (25 years) and any conflicts with built structures, including the below-ground service trenches that will run north-to-south through the Pocket Park. The Council's Urban Forester has assessed these proposals and considers them to be well thought through and deliverable.



Image 89 *(above): Site layout showing the arrangement and variety of the 39 trees proposed. Purple and orange indicate large/medium sized trees, whereas blue and red indicate smaller naturalistic or feature trees.*

506. Additional to the 39 at-grade trees, a number of trees are proposed to be planted within the high-level gardens serving the PBCL and conventional (Class C3) housing occupiers. These trees will be limited in size, being mainly multi-stem specimens in raised planters. They will nevertheless provide amenity value to the residents and some biodiversity benefit.

507. Sufficient soil volumes, long-term management and watering schedules are paramount to establishing trees within the urban environment. The applicant is currently working through the technical and construction design with GreenBlue Urban and Deeproot Silva Cell System, and has confirmed that tree pit designs will use the GreenBlue Urban Target Soil Volumes calculator to guide the detail. This solution allows for some service runs through the rootcell structure and coordination with the service trenches. Final details are to be secured through planning conditions and obligations.



***Image 90** (above): Plan showing, in brown, the below ground tree pits formed using rootcell systems, with the exact volume of soil required to be confirmed with species selection.*

508. Overall the proposal presents a significant uplift in tree cover for the site, which should be treated as a major benefit of the planning application.

Conclusion on public realm, landscaping and trees

509. The scheme would make a generous and high quality public realm offer, the centre piece of which would be a new park open to the general public on a 24/7 basis. Elsewhere at ground level, numerous planting beds are proposed, as well as enlargements to the footways along the site's western and southern boundaries. A total of 39 new trees would be planted, making a major contribution to the Opportunity Area's green infrastructure.

510. Having reviewed the landscaping proposals, the Council's Urban Forester considers the indicative materials and specifications to be of a high quality, with appropriately-selected trees and other soft planting. Many of the spaces would be suitably framed by active frontages and/or accommodate incidental play facilities. This will make for a rich, vibrant and attractive publicly-accessible realm.

511. Through the Section 106 Agreement, two contributions will be secured. One, of £339,480, will be put towards the delivery of off-site (Old Kent Road Opportunity Area) public open space. The other, of £25,000, will be used to support the ongoing maintenance of the nearby Pat Hickson Park.

Green infrastructure, ecology and biodiversity

512. Policy G5 of the London Plan states that urban greening should be a fundamental element of site and building design. It requires major developments that are predominantly commercial to achieve an Urban Greening Factor (UGF) score of 0.3 and those that are predominantly residential to achieve a score of 0.4. The scheme proposed by 24/AP/2387 falls within the latter category.

513. The Environment Act 2021 introduced a requirement for planning applications to deliver biodiversity value 10% in excess of the pre-development biodiversity value of the on-site. This is known as 'Biodiversity Net Gain' (BNG). The Act requires planning authorities to secure the BNG value delivered by the development through an appropriate planning mechanism for a minimum duration of 30 years.

514. London Plan Policy G6 requires development proposals to manage impacts on biodiversity and secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process. Southwark Plan Policy P60 seeks to enhance populations of protected species and increase biodiversity net gains by requiring developments to include features such as green and brown roofs, green walls, soft landscaping and nest boxes. Southwark Plan Policy 59 requires major development to provide green infrastructure with arrangements in place for long-term stewardship and maintenance funding.

Urban greening

515. The proposal would achieve a UGF score of 0.40 through a combination of these principal elements:

- 261 square metres of semi-natural vegetation;
- 661 square metres of 'larger' tree coverage (trees planted in connected pits with soil volumes to at least two thirds of the projected tree canopy);
- 347 square metres of 'smaller' tree coverage (trees planted in connected pits with soil volumes less than two thirds of the projected tree canopy);
- 660 square metres of extensive green roof with substrate of minimum settled depth of 80mm; and
- 355 square metres of intensive green roof with substrate of minimum settled depth of 150mm.

516. This is deemed to be the maximum achievable UGF score given the following constraints:

- providing functional pedestrian / maintenance uses requires the provision of hard surfaces;

- soil conditions result in poor drainage at ground floor and prevent rain gardens;
- roof areas have been maximised for use of services equipment to deliver the required Energy Strategy, resulting in reduced possibilities of green/brown roofs on the tops of the buildings.

517. The score of 0.40 would meet the minimum policy requirement, and as such should be treated as a benefit of the scheme. A two-part condition will be imposed to ensure the development is built-out to achieve the 0.40 UGF.

Ecology

518. Within a 2 kilometre radius of the development site, there are 2 two statutory designated sites and 43 non-statutory designated sites. One of the non-statutory sites is the South Bermondsey Railway Embankment SINC, which runs directly alongside the application site. The SINC, by reason if its proximity, has the potential to be impacted by the redevelopment of the application site.

519. An Ecological Appraisal accompanies the planning application. It notes that the site comprises mixed scrub and ruderal vegetation, distributed around areas of hard standing. Butterfly bush, listed as a London Invasive Species Initiative category 3 species, is dominant on the site. The Ecological Appraisal also notes that Japanese knotweed has historically been present across a large portion of the site, and one juvenile specimen is currently growing on the eastern (railway land) side of the common boundary.

520. The on-site flora provides habitats for invertebrates, reptiles and nesting birds. With regard to bats, no records were found within the site boundary.

521. The Ecological Appraisal makes recommendations for suitable vegetation clearance in order to prevent disturbing and damaging nesting birds, and for creating suitable lighting so as not to disturb and disrupt the already established path of commuting and foraging bats. To ensure these are adopted, in turn help protect local ecology, the following conditions are proposed:

- a pre-occupation external lighting strategy condition that makes express reference to a bat sensitive specification; and
- a compliance condition requiring a sensitive habitat clearance of the site between the months of March and September (when reptiles and amphibians are active), in full accordance with the methodology given at Section 5 of the submitted Ecological Appraisal, with the process to be overseen by a suitably qualified ecologist.

522. Two conditions have been recommended by the Council's Ecologist, one for nesting features to be incorporated within the fabric of the proposed building, the other requiring the eradication or long-term management of the on-site London Invasive Species Initiative plants.

523. With regard specifically to the adjacent SINC, the Ecological Appraisal concludes that no direct impacts would result from the proposed development. However, the Appraisal recognises that indirect impacts could occur (such as through noise, lighting, or air pollution). Therefore, a Construction Environmental Management Plan (CEMP) condition is recommended, to ensure the adoption of all good practice pollution prevention measures and industry standard methodologies.

524. With the above conditions secured, the ecological impacts of the development would be mitigated, in compliance with Policies P59 and P60 of the Southwark Plan.

Biodiversity

525. The applicant's Biodiversity Net Gain Assessment found the site to have a baseline score of 0.64. This is attributable mainly to the mixed scrub and ruderal vegetation that has grown up on the site in recent years. In order to mitigate for the loss of pre-development habitats, an exhaustive landscape scheme would be implemented across the site. The proposed habitats include green roofs, landscaping, trees, mixed scrub and green walls. The habitats created would be of value for primarily birds, bats and invertebrates.

526. With the applicant having maximised opportunities for biodiversity within the proposal, the final BNG score for the site is a gain of +0.52 habitat units (or +81.79%), with the trading rules met.

527. As set out in the BNG legislation, "significant" enhancements are areas of habitat enhancement which contribute significantly to the proposed development's BNG, relative to the biodiversity value before development. What counts as a significant enhancement will vary depending on the scale of development and existing habitat. Normally however, the guiding criteria would be those listed in the first column of the below table (as set out in the Biodiversity PPG 2024). Listed in the second column of the table is an assessment of the proposal against these criteria:

BNG Significance: Summary table	
Government guidance: does the proposed habitat contain?	**Assessment of proposal**
Habitats of "medium" or "higher" distinctiveness in the biodiversity metric	The following proposed area-based habitats have a distinctiveness of "medium": • Mixed scrub; and • Urban tree.
Habitats of low distinctiveness which create a large number of biodiversity units relative to the biodiversity value of the site before development.	The proposal would deliver: • Intensive green roof (0.13 units); • Mixed scrub (0.14 units); and • Urban trees (0.73 units).

Habitat creation or enhancement where distinctiveness is increased relative to the distinctiveness of the habitat before development	N/A
Areas of habitat creation or enhancement which are significant in area relative to the size of the development.	Urban trees are proposed to cover approximately 0.25ha of a total site area of 0.6ha.
Enhancements to habitat condition e.g. from “poor” or “moderate” to “good”.	N/A

528. In this instance, it is considered that the proposed development would deliver on-site enhancement in biodiversity that qualifies as “significant”.

529. Therefore, through planning obligations, the following will be secured:

- retention and sustention of the biodiversity gain for 30 years
- payment of a fee by the applicant to cover the Council’s cost of periodic monitoring over 30 years;
- a Habitat and Management and Monitoring Plan to ensure that appropriate management arrangements are put in place (this will need to be submitted to the Local Planning Authority in tandem with a biodiversity gain plan, the latter being a requirement secured through a pre-commencement condition).

Conclusion on urban greening, ecology and biodiversity

530. The Council’s Ecologist and Urban Forester have reviewed the application information and deemed the proposal to be satisfactory. The Ecologist welcomed the provision of urban greening, recommending conditions to secure the provision of six Swift nesting bricks and six bat bricks/tubes within the building fabric to support local biodiversity, along with appropriate BNG management and monitoring provisions through obligations and conditions. A two-part condition will be imposed at the request of the Urban Forester to ensure the development is built-out to achieve the 0.40 UGF score.

Archaeology

531. The site is located within the 'North Southwark and Roman Roads' Archaeological Priority Area and is of geoarchaeological significance. Having considered the proposal and the desk-based assessment that supports the planning application, the Council’s archaeologist is satisfied that there is a secure baseline of data to assess the archaeology on site.

532. In particular, the site is known to preserve palaeoenvironmental remains of interest to inform the ecological development of the Bermondsey Lake (a prehistoric relic channel of the River Thames that runs through Bermondsey,

into South Bermondsey crossing the borough border into Lewisham). The site sits upon a change in the gravel surface at the base of the lake, falling from -1.3mod in the north to -3.9mod in the south. What this means is the sequence of lake deposits will be truncated by the proposed basement, the finished floor level of which would (at -3.3mod) be below this level, the piles and pile caps causing this impact. The basement would, therefore, be cut into the underlying gravels over much of the site. For this reason, further assessment and recording of these deposits is necessary.

533. At Bramcote Grove, excavations revealed two phases of bronze-age trackway. This is made up on horizontally-laid oak timbers, held in place with alder stakes over sheets of bark. One phase of the trackway runs to the north and east so would potentially cross into the development site; there are indications that the trackway may turn away from the development site, but equally this could be an entirely different structure. The trenching undertaken on this site is exceptionally limited in scale to enable the preservation of the remains of the trackway, across a broader area and the associated deposits.

534. Given all of the above, the development has the potential to contribute greatly to our knowledge of the prehistoric landscapes of Bermondsey and Southwark.

535. The applicant has agreed to a number of conditions recommended by the Council's archaeologist to secure the archaeological interests of the site. Additionally, and in accordance with Council's CIL and S106 SPD, the applicant will provide £11,171 of funding to cover monitoring and technical archaeological support during the construction works.

Transport and highways

Trip generation

536. Policy T4 of the London Plan requires development proposals to ensure the impacts on the capacity of the transport network are fully assessed and that any adverse impacts are mitigated. Policies P45, P49 and P50 of the Southwark Plan require developments to minimise the demand for private car journeys and demonstrate the public transport network has sufficient capacity to support any increase in the number of journeys by the users of the development.

537. As a borough, Southwark agrees with TfL that bus services will need to be increased in the Old Kent Road area ahead of the delivery of the BLE, in order to accommodate the demand generated by additional homes (as part of Phase 1 of the Delivery Plan) and additional jobs. As part of this agreement, TfL is required to report back to the Council with evidence that these pooled contributions are being spent appropriately; this reporting will serve as evidence that any further financial draw from future development is justified. As part of the agreement, TfL can require contributions from developments based on a tariff of £2,700 per proposed home (or equivalent for PBCL units) index-linked to March 2019.

538. Given the lack of on-site general needs car parking along with the various public transport options in the area, cycle links and cycle parking, the trips associated with the proposed residential accommodation and the three community/ commercial/ business units would predominantly be by sustainable travel modes including on public transport, by bicycle and on foot. The main drivers of trip generation in the proposed development are the residential (Class C3 and PBCL) uses, which would generate the following estimated trips:

    - 491 two-way trips in the AM peak hour (of which only 13 would be undertaken using a private motor vehicle, as either the driver or a passenger); and
    - 292 individual trips in the PM peak hour (of which only 7 would be undertaken using a private motor vehicle, as either the driver or a passenger).

539. Compared to the extant planning permission, 24/AP/3687, the new proposal hereunder consideration would generate an estimated uplift of 148 two-way trips in the AM peak and an estimated uplift of 79 two-way trips in the PM peak.

540. Notwithstanding the net increase in two-way trips in the AM and PM peaks compared with the extant permission, it is considered these trip numbers would not have any noticeable adverse impact on the local highway network due to the initiatives proposed in the Travel Plan. These initiatives include the appointment of a dedicated Travel Plan Coordinator, the provision of cycling facilities, furnishing users of the development with travel information, and offering cycle training courses.

541. As there would be a public transport capacity impact, a contribution of £1,282,500 towards local bus service investment is to be secured for use by Transport for London. This to ensure the network is commensurately resourced to accommodate the extra passengers, which the applicant has agreed to.

542. A Final Travel Plan and Transport Methods Survey is to be secured to ensure the measures outlined in the draft document are implemented and promoted.

Servicing and deliveries

543. London Plan Policy T7 deals with servicing and delivery arrangements during construction and end use. With respect to end use, the policy requires provision of adequate space for servicing, storage and deliveries to be made off-street, with on-street loading bays only used where this is not possible.

Servicing/delivery trip generation

544. Accommodating servicing trips to and from the site without affecting the operation of Ilderton Road, which is a classified road and bus route, is a critical consideration.

545. The applicant's Transport Assessment, which uses TRICS data and includes an accumulation study, predicts on a daily basis approximately 138 deliveries to the development, with the vast majority being in connection with the PBCL and conventional housing.

546. The TRICS assessment predicts that the maximum number of arrivals and departures would occurs between the times of 10:00 and 11:00, when there are nine and eight movements respectively.. During the busiest hour, this would equate to a vehicle arriving every 6-7 minutes. For the majority of the day the number of servicing trips would be significantly lower.

547. While the applicant's estimates are not contested, the integrity of the servicing strategy would be improved by implementing a 20-minute restriction on the two proposed loading laybys (discussed in detail below) between the hours of 6am to 10pm. This 16-hour period is the main time that buses use Ilderton Road, and also includes times when early morning deliveries to a potential convenience store are likely to occur. The applicant has agreed to implementing a Traffic Management Order (TMO) that will apply this loading restriction.

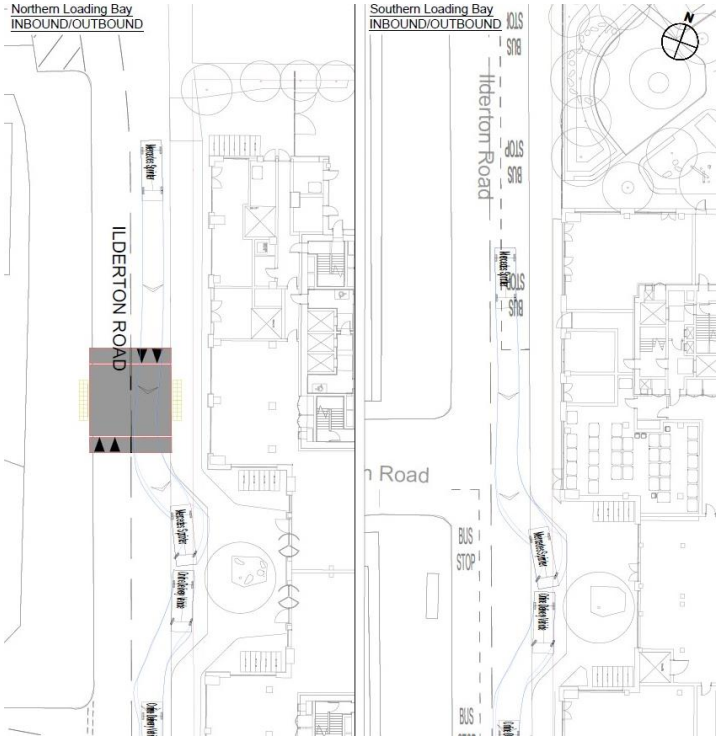
548. Additionally to the TMO for the two proposed inset loading laybys, the applicant has committed to upgrade the existing waiting restrictions along the full 194-metre length of Ilderton Road onto which the site fronts (i.e. from the junction of John Berylson Way, northwards until the closed junction with Delaford Road). These upgrades would introduce 'double blips' to the current double yellow lines, preventing loading and stopping at any time of the day or night, 365 days of the year. This will be introduced via a TMO. This will help to ensure that Ilderton Road does not become obstructed with inappropriately parked or waiting vehicles associated with the demands created by the proposed development.

549. In order to meet the key objectives of the plan (i.e. to minimise service vehicle / car conflict and safeguard the amenity of pedestrians), the following initiatives will be adopted through the Final Delivery and Servicing Plan and the associated monitoring mechanisms, including a Delivery and Servicing Bond:

- on-site management team will manage servicing activity at the site, seeking where possible to minimise deliveries during peak hours;
- all residents will be provided with a Home User Guide containing details on how to book deliveries;
- suppliers will be encouraged to use consolidation wherever possible; and
- the management teams will ensure that deliveries remain in the vicinity of the site for as little time as required and that vehicle engines are switched off while stationary (where possible).

<u>Servicing/delivery routing and facilities</u>

550. In terms of routing, all delivery vehicles would approach the site south-bound along Ilderton Road, pulling into one of the two fully inset loading laybys proposed along the eastern side of the highway. The proposed arrangement is similar to that approved under the extant permission.



Images 91 and 92 *(near left and near right): Swept path analysis of delivery vehicles undertaking sim-ultaneous loading to the proposed northern and southern laybys.*

551. The proposed inset laybys would, at 15 metres in length along their shortest edge, be able to accommodate simultaneous deliveries. With the maximum loading duration of 20 minutes per delivery ensured by means of the agreed TMO, the proposed servicing facilities would be of a sufficient size to accommodate the maximum forecasted servicing demand. The Site Management Team (or equivalent) would be responsible for overseeing servicing and delivery operations at the development. The arrangements are considered acceptable.

Servicing/delivery hours

552. Servicing hours to all of the uses would be restricted by condition, as follows:

- 06:30 to 22:00 on Monday to Saturdays;
- 10:00 to 18:00 on Sundays and Bank Holidays.

Conclusion on servicing/deliveries

553. The proposed servicing arrangements, with appropriate routing of inbound and outbound vehicles, as well as limitations on delivery hours, are supported by the Council's Transport Policy and Highways Development Management Teams.

554. The submission and approval of a standalone Final Delivery and Servicing Management Plan (DSP) is to be required by condition. This should be based on the principles established by the outline version submitted with the application, and the operation of the building thereafter will need to be in accordance with the approved Final DSP. As a precautionary measure, a Delivery and Servicing Management Bond will be secured so that adherence to

the Final DSP and highways impacts can be monitored over the course of the first two years of operation.

PBCL move-ins and move-outs

555. The PBCL units would be fully fitted-out for immediate occupation, with the furnishings extending to linens, plants, televisions and wall art. As such, any new resident moving-in to one of the units would bring limited belongings with them. It is therefore likely that a proportion of residents would use public transport to move in and out. As such, by their design, the PBCL units reduce to an extent the reliance on nearby loading facilities on move-in days. Notwithstanding all of these considerations, there will still be a proportion of residents who choose to use a private vehicle on their move-in day.

556. Typically, an 18 month program will be needed to achieve a stabilised occupancy. Notwithstanding, when the PBCL first opens, a significant number of move-ins could occur within a compressed period of time, which may generate a substantial demand for loading space nearby. In all likelihood, residents arriving by private vehicle would try to use the two proposed inset loading bays on Ilderton Road; however this has the potential to compromise the delivery and servicing strategy, as these ad-hoc move-ins could prevent commercial delivery vehicles from using the loading bays. A further important consideration is the proximity of two bus stops: one stand is on the western side of Ilderton Road, the other stand will be delivered as part of this planning application on the eastern side. Therefore, maintaining road safety and efficient bus operations along Ilderton Road will be important during the initial move-in period. For example, private vehicles attempting to unload by making use of the two inset laybys could cause servicing vehicles to wait on the highway, creating congestion and obstructions.

557. To minimise the risk of any of the above scenarios materialising, the applicant has offered the following measures to ensure move-ins are managed effectively:

- dates and times for move-ins and move-outs to be booked using the online resident portal or by speaking with the site management team – this will allow co-ordination by the on-site management team to ensure they do not overlap with other move-ins; and
- a secure, temporary ground floor storage area to be provided to allow goods to be unloaded from vehicles quickly (with staff on hand to assist with unloading/ unloading and direct residents to the storage area).

558. These measures are considered acceptable. The holistic move-in strategy will be finalised in the Final Operational Management Plan. With the final version of the Plan secured prior to occupation, no harm would be caused to the local highway network or surrounding residential amenity.

Refuse storage arrangements

559. With regard to the PBCL, the combined volumes of refuse produced by the

proposed units and ancillary facilities would be stored in dedicated facilities at basement level. Waste would be collected by a private contractor, and on waste collection days PBCL staff would bring the refuse to street level via a dedicated lift. Plans have been provided demonstrating that the refuse store has been sized to accommodate the refuse receptacles necessary to meet the volumes of waste generated by the PBCL, with sufficient manoeuvring and circulation space factored-in.

560. With regard to the 186 conventional housing units, it will be the responsibility of the residents to transport their waste from their apartment to the bins provided in the communal bin store at ground floor level. Waste would be collected by Southwark Council Refuse Services. With the drag distance being no more than 10 metres between the refuse stores and the pick-up point, the proposed collection arrangements are acceptable, as is the detailed design of the stores, with sufficient manoeuvring and circulation space factored-in.

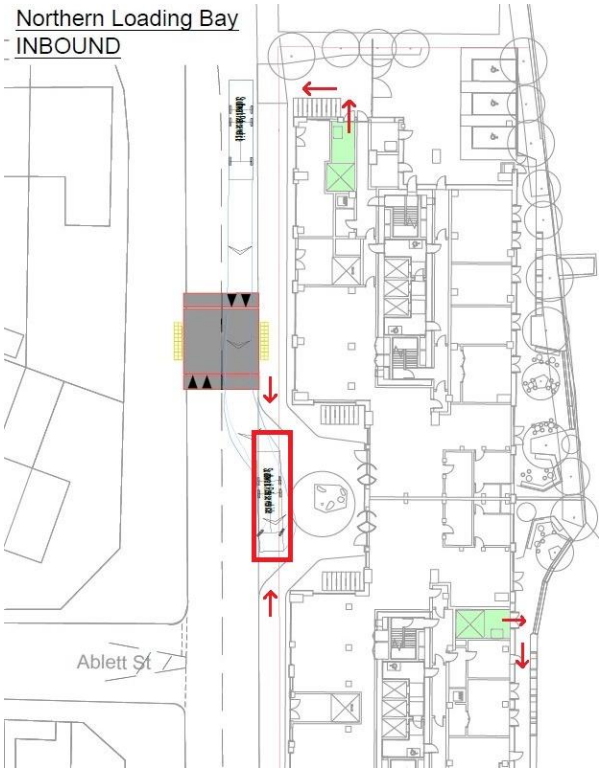


Image 93 *(above): Refuse strategy for the PBCL element, with the lifts from the basement-level stores depicted in green.*

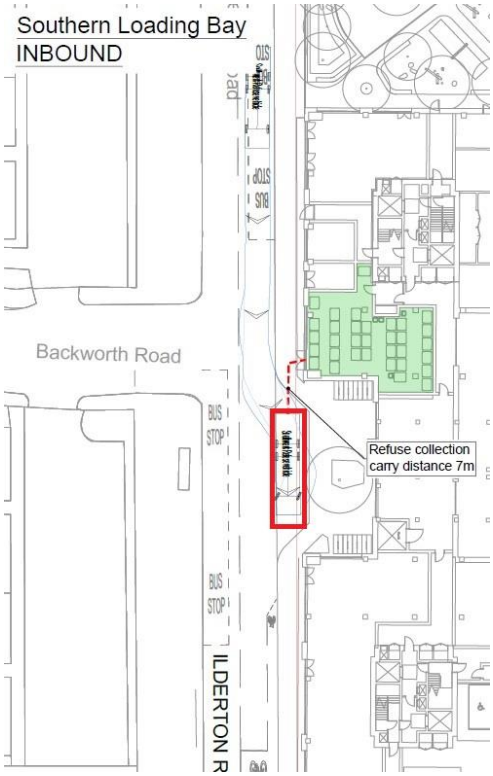


Image 94 *(above): Refuse strategy for the Class C3 element, with the stores depicted in green.*

561. The operators of the community, commercial and employment/business units will be expected to keep refuse within the demise of the property, and transport this to the kerbside on collection day by private contractors.

562. The Final DSP, to be required by condition, will secure the finalised refuse details including the collection arrangements.

Car parking

563. Policy T6 of the London Plan requires developments in locations with existing and future high public transport accessibility to be car-free, save for adequate parking for disabled people. Specific requirements for different uses are set out in Policy T6.1 through to Policy T6.4, while Policy T6.5 deals with non-residential disabled persons parking.

564. Southwark Plan Policy P54 echoes the London Plan, promoting car-free development in zones with good public transport accessibility. It requires car-free non-residential proposals in CAZ locations, and for any disabled parking to be provided on-site and supported by EVCPs.

Wheelchair car parking provision

565. Applying the London Plan standards, a total of fifteen wheelchair accessible parking spaces should be provided on-site from first occupation of the proposed development, split between the residential uses on the following basis:

- PBCL: nine (i.e. 3% of one third of 865)
- Conventional housing: six (i.e. 3% of 186)

566. The Southwark Plan requires a maximum of one car parking space per wheelchair accessible unit, which for this application would equate to a maximum of 18 for the conventional housing. The policy makes clear that lower levels of parking can be provided, depending on:

- the anticipated demand for parking spaces,
- the tenure of the development;
- the quality and accessibility of the local public transport network; and
- the access to local amenities.

567. The Southwark Plan sets out no specific standards for blue badge parking for PBCL

568. A total of six Blue Badge parking bays are proposed for the exclusive use of the future occupiers – three for the North Building, three for the South Building. Although the three spaces proposed at the South Building would fall short of the London Plan policy requirements for conventional housing, given the site's location close to bus routes and the Overground station, as well as its predicted future PTAL rating, it must be recognised that residents would benefit from a range of public transport options. It is also relevant that the Southwark Plan, as the more recently adopted and locally specific plan, sets maximum level of wheelchair parking provision rather than minimum levels. As expanded upon in the following section of this Committee Report, the applicant has also offered to fund the delivery of two Car Club bays (one on-site and one in the Bramcote Estate), which would provide an alternative car travel option for less physically able residents who do not own their own car. On balance the number of car parking spaces proposed is acceptable.

Reducing car usage

569. Consistent with the extant planning permission, the applicant has agreed to deliver an on-street Car Club bay. As there is no available space along the Ilderton Road and John Berylson Way highways that the site fronts, the space will be delivered on a nearby public highway. This is likely to be on Verney Way, in the adjacent Bramcote Estate. The works will be delivered as part of the Section 278 Agreement.

570. In addition to funding the delivery of a new on-site Car Club bay within the vicinity of the site, the extant planning permission pledged to contribute towards the costs of establishing a new cross-borough CPZ spanning eastwards from Ilderton Road into the Surrey Canal Triangle area. However, in the 18 months since the extant planning permission was granted approval, the CPZ has been implemented (the costs of delivery being sourced from other funding pots). As such, the need for this financial contribution no longer applies.

571. As an alternative to the CPZ contribution, the applicant for the newly proposed application has offered to deliver an accessible Car Club bay on the portion of land at the southernmost edge of the site. 'Accessible' car club bays are of larger proportions than a typical Car club bay, with more generous buffer space around the perimeter of the bay to enable users to manoeuvre comfortably. To ensure this bay is equipped with a specialised Car Club vehicle, a financial contribution from the developer may be required (the exact sum is to be confirmed, following dialogue with Car Club operators). This proposal is considered an acceptable alternative to the previously-secured CPZ contribution.

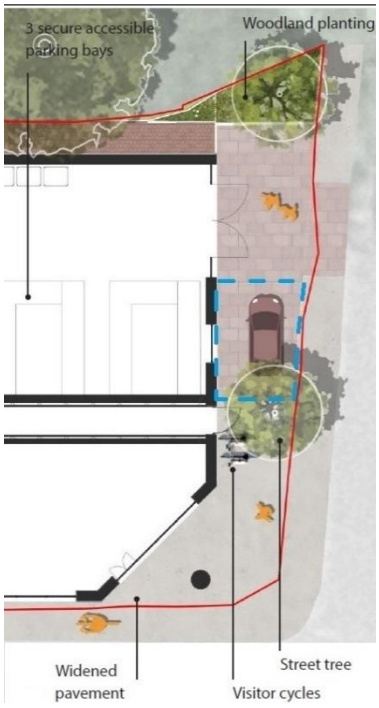


Image 95 *(right): Rendered ground floor plan in context, showing the proposed accessible Car Club bay edged in blue dashed line.*

572. One final measure proposed by the applicant to reduce car usage is the provision of the 3-years free Car Club membership for all residents of the South Building (pre-loaded with some driving credit upon first occupation of each dwelling).

573. Through an obligation in the Section 106 Agreement, all residents (except for Blue Badge holders) of the proposed development would be exempted from applying for parking permits.

574. It is considered that the abovementioned measures in combination will be effective in reducing private car usage.

<u>Provision for electric vehicles</u>

575. Two of the Blue Badge spaces in the northern car park are to be equipped with an Electric Vehicle Charging Point (EVCP), as is the proposed Car Club bay at the southern extent of Block D. This level of EVCP provision is considered acceptable and will be secured by obligation.

Cycle parking

576. London Plan Policy T5 sets minimum cycle parking standards for conventional housing and commercial uses, while standards for PBCL are set out in the Mayor's Shared Living LPG. Southwark Plan Policy P53 sets its own requirements, which are generally higher than the London Plan standards.

577. The table below summarises the minimum cycle parking required by the Southwark Plan and at the Mayoral level, alongside the provision proposed by this application:

Cycle parking minimum policy requirements vs provision: Summary table

Land use	Long-stay (staff) spaces			Short-stay (visitor) spaces		
	Requirement		Provision	Requirement		Provision
	SP '22	LP '21		SP '22	LP '21	
PBCL	865	649	460	87	23	58
Class C3 housing	295*	334	334	19	6	
Flexi commercial#	2	2	2	18	18	
Flexi community**	2	2	2	2	2	
Total	**1164**	**987**	**796**	**126**	**49**	**58**

* *For the purposes of these calculations, the site has been treated as being in the 'PTAL 3 and 4 areas' to reflect the likely future improvement to the site's PTAL, and the higher cycle storage yield this would generate.*

\# *These flexi commercial calculations are, as per the Southwark Plan and London Plan requirements, based on GEAs (of 51 and 293 square metres for Units 1 and 3 respectively)* and have *been attributed to a "food retail use".*

** *These flexi community calculations are, as per the Southwark Plan and London Plan requirements, based on a GEA of 118 square metres for Unit 2, and have been attributed to an "other (library, church etc.) use"*

Long-stay cycle parking

578. As the table above shows, the proposal would fall short of the minimum London Plan requirement by 129 long-stay spaces, and the minimum Southwark Plan requirement by 345. This shortfall derives from the PBCL, not from any of the other proposed uses.

PPCL long-stay cycle parking

579. With regard specifically to the PBCL, in total 460 secure long stay cycle parking spaces would be provided. The 460 spaces would be split between Block A and Block B proportionate to the populations of the two blocks, thus ensuring that should the premises ever be operated as two separately-demised PBCL developments, each development would be equipped with sufficient storage for its residents. The mix of formats would be:

- 196 two-tier Josta Stands [392 spaces] (85% of the total);
- 22 standard Sheffield Stands [44 spaces] (10% of the total); and
- 12 Sheffield Stands for use by accessible/larger cycles [24 spaces] (5% of the total).

580. Detailed layouts have been provided of all the cycle stores, showing compliance with the London Cycle Design Standards, including adequate aisle widths and stand spacings, adequate clear headroom, sufficient space for 2 cyclists to use the lift at any one time, and sufficient space for 2 cyclists to pass in corridors. For these reasons, the quality of long-stay cycle storage is considered acceptable.

581. In an effort to address the shortfall from the minimum number of spaces expected by policy, the applicant has proposed to supplement the long-stay stands with a free-of-charge Cycle Share Scheme. 45 of these rentable bikes would be provided within a bank of lockers in Block A's ground floor lobby; the lockers containing the other 15 bikes would be provided in Block B's lobby. Responsibility would fall to the PBCL operator to run a booking system, keep the bikes in well-maintained order, and replace/upgrade them as necessary over the lifetime of the development. With the provision of the 60 extra bikes, the total cycle offer for the PBCL residents would comprise the following:

Breakdown of long-stay PBCL cycle parking: Summary table						
	No. of units	**Long-stay spaces by typology**				
		Josta	**Sheffield**	**Larger**	**Folding Bikes**	**Total**
Block A	466	202	22	12	45	281
Block B	399	190	22	12	15	239
Total	**865**	**392**	**44**	**24**	**60**	**520**

582. Although the 60-unit Cycle Share Scheme is a non-conventional form of long-stay cycle parking, it may be genuinely advantageous to those who do not regularly choose, or have not previously sought out, cycling as a means of travel. The type of bikes to be provided has not been determined at this stage but it is envisaged that they would be a 'hybrid style' model.

583. The cycle lockers should not be seen as increasing the quantum of long stay spaces, but rather as a form of mitigation (and a limited one) for the shortfall from the standards required by the London Plan (0.75 spaces per resident) and

Southwark Plan (1 space per resident). Additional to the lockers, a Travel Plan, to be secured via the Section 106 Agreement will include a mechanism that requires usage to be monitored and for additional cycle parking to be provided should the monitoring prove that the 460 spaces and the Cycle Share Scheme are not meeting the demands of the PBCL residents. Such additional access to cycling opportunities would, realistically, need to be off-site provision (e.g. membership of Santander Cycles or a dockless scheme that operates locally).

584. The Section 106 Agreement will ensure that the cycle lockers remain free-of-charge and for the exclusive use of occupiers of the PBCL.

585. This failure to meet the minimum policy requirements should be treated as a deficit of the scheme, but –when the mitigation as outlined above is taken into account, and when balanced against the other various benefits of the planning application– not sufficient to warrant refusal of planning permission.

Conventional (Class C3) housing long-stay cycle parking

586. With regard specifically to the conventional housing, in total 334 secure long stay cycle parking spaces would be provided – these would be spread across one store room at ground floor level and a number of further store rooms in the basement. The mix of formats would be:

- 125 two-tier Josta Stands [250 spaces] (75% of the total);
- 34 standard Sheffield Stands [67 spaces] (20% of the total); and
- 9 Sheffield Stands for use by accessible/larger cycles [17 spaces] (5% of the total).

587. The level, quality and detailed design of the proposed long-stay cycle parking is acceptable. The delivery of these facilities will be secured through a compliance condition.

Community, commercial and business/employment long-stay cycle parking

588. With regard specifically to the flexible commercial/community uses, in total four secure long stay cycle parking spaces would be provided – two within the footprint of Unit 2 and two within the footprint of Unit 3. Unit 1, by reason of its floor area, is exempted by policy from needing to provide long-stay storage. Although detailed plans showing how the two spaces needed for both Unit 2 and Unit 3 have not been provided by the applicant, realistically such a small number of bikes could be comfortably accommodated within the footprint of each unit. As such, policy compliance can be assumed in respect of these two units.

589. As the non-residential floorspace proposed by this application would take the form of a number of small-scale units, the non-provision of dedicated showers for employees is acceptable in this instance.

Short-stay cycle parking

590. With regard to the proposed short-stay (visitor) provision, 25 standard Sheffield hoops are proposed, providing 50 spaces in total. A further four larger-format stands (eight spaces) are proposed, which are designed to accommodate cargo/accessible bikes. This brings the total provision to 58 spaces. Aside from one small cluster in the Pocket Park, the stands would be distributed along the length of the buildings' Ilderton Road frontages in locations that would keep the majority of the effective footway width clear of cycle storage.

591. While the minimum London Plan requirement would be met by the short-stay provision, the minimum Southwark Plan requirement would not, the shortfall being 68 spaces. In recognition of this, the applicant has offered to monitor the use of the proposed Sheffield stands as part of the Travel Plan and to explore opportunities to provide additional spaces if the demand necessitates it.

592. Given that opportunities have been maximised around the base of the building and within the red line boundary of the site to accommodate visitor cycle parking, and having regard to the applicant's offer to contribute towards investment locally in TfL (Santander) docking stations in addition to the monitoring mechanism within the Travel Plan, in this particular instance the shortfall is considered permissible.

Improving access to cycle hire options

593. Given that the development would introduce up to 26 additional FTE employees to the site as well as up to 1,051 new households once all the dwellings and PBCL units are occupied, the applicant has agreed to contribute £23,716.66 (index linked) towards expansion of one or more TfL (Santander) cycle docking stations in the vicinity of the site. To be secured in the Section 106 Agreement, this contribution would meet the requirements of Policy T5 of the London Plan and Policy P53 of the Southwark Plan.

Legible London signage

594. The applicant has agreed, at the request of TfL, to make a contribution of £32,000 towards providing new and refreshed Legible London signage. This will be secured in the Section 106 Agreement.

Healthy Streets

595. London Plan Policy T2 requires development proposals to demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with TfL guidance.

596. Some ways in which the proposal would support the ten indicators are:

- It would be car free save for six Blue Badge parking spaces and two Car Club bays, thus promoting walking, cycling and use of public transport;

- It would provide investment in sustainable transport facilities and services to commensurately mitigate the impact on existing infrastructure;
- it would enhance public realm around the site as well as within the surrounding network of streets; and
- it has been designed to minimise air and noise pollution.

597. The Active Travel Audit submitted by the applicant identified that the largest barriers to active travel within the vicinity of the site relate to surface treatments, signage and the safety and comfort of pedestrian/cycle routes. Examples include:

- the existence of double kerbs (i.e. one kerb stacked on top of another), which create access problems for wheelchairs, prams etc.;
- the absence of any signage at the step-free access point to South Bermondsey Station;
- the narrowness of footways; and
- (on certain stretches of highway locally) the absence of an advanced stop line for cyclists or a traffic light that comprises an early release signal for cyclists.

598. In accordance with Healthy Streets and having had regard to the findings of the applicant's Active Travel Audit, various contributions have been sought from the applicant towards a range of highway safety measures together with improvements to pedestrian/cycle routes in the vicinity of this development. The specific set of works is detailed in the 'Planning Obligations: Summary Table' in a later part of this report, and are focussed on improving the junction between John Berylson Way and Ilderton Road to ensure conditions are safe, comfortable and convenient for pedestrians and cyclists.

599. In addition to the financial contribution referred to above, through the Section 278 Agreement, Healthy Streets improvements would be delivered in the form of a raised table on Ilderton Road, north of the junction with Ablett Street and south of the junction with Ablett Road. This would have traffic calming benefits.

Level changes across the ground plan

600. The proposed development would improve the public realm along the frontage of the site on Ilderton Road and John Berylson Way, including widening the footway to a minimum of 2.5 metres (with exception of four pinch-points, one at either side of the two proposed loading bays). As part of these public realm enhancement works, the improved existing and new footway offered for adoption would be provided with varying cross-fall from the back of proposed footway to the kerb; at its shallowest, the cross-fall would be 1:77 and at its steepest 1:40. This is likely to result in regrading of some of the existing footway. This is standard practice and will be agreed through the Section 278 process, which occurs subsequent to planning permission being granted. No changes are proposed to the existing road carriageway or kerb levels.

601. The applicant will refine the proposed FFLs as they work through the post-planning detailed design stage. In the interests of ensuring the most efficient use of land, and having regard to inclusive design policies and equalities considerations, a planning condition is recommended requiring the applicant to provide a Final Ground Plane Spot Levels Plan prior to above grade works.

Transport and highways summary

602. Having considered all transport and traffic related implications, the Council's Highways, Transport Planning and Waste Management Teams are satisfied with the proposal. The scheme would minimise vehicle movements by prioritising use of public transport, walking and cycling, and by encouraging consolidation of deliveries.

Environmental matters

Construction management

603. The applicant has submitted an Outline Environmental Construction Management Plan explaining how construction activities will be managed to minimise neighbour amenity, environmental and highway network impacts. This document has been reviewed by the relevant transport and environment consultees, who have deemed it to be a satisfactory framework document.

604. In order to ensure that increases in traffic, noise and dust associated with the demolition and construction phases of the development are minimised, a Final Construction Environmental Management Plan and a Construction Logistics Plan are to be required by condition. The applicant has also agreed to pay a sum of £19,000 to the Council's Highways Network Management to fund their work in monitoring adherence to the CEMP through the demolition and construction phases.

Flood risk, resilience and safety

605. The site is in Flood Zone 3 and is located within an area benefitting from flood defences. The applicant's Flood Risk Assessment sets out that the site is at low risk of groundwater flooding and only a small portion of it is at risk of surface water flooding. The Environment Agency has reviewed the applicant's Flood Risk Assessment and considers it to be acceptable.

606. In terms of flood resilience and safety, the Council's Flood Risk Management Team has assessed the applicant's Flood Risk Assessment and is satisfied that:

- The sequential test has been satisfied;
- the site will not flood as a result of the 1 in 30 year rainfall event;
- there will be no flooding of buildings as a result of events up to and including the 1 in 100 year rainfall event;

- on-site flow as a result of the 1 in 100 year event (with a climate change consideration) will be suitably managed by locating all residential accommodation on the first floor and above, and through adjusted floor levels directing flows away from buildings; and
- the ground floor substations and basement storey (including the basement-level plant rooms) will be safeguarded from ingress through flood resistant construction up to the flood defence level and the deployment of temporary flood barriers across all relevant door/access openings up to the flood defence level.

607. Compliance with the Flood Risk Assessment will be secured by way of a condition, and a pre-commencement obligation will be imposed requiring submission of a Flood Warning and Evacuation Plan.

Sustainable urban drainage

608. The applicant's Drainage Strategy proposes that rainwater flows would be attenuated through the use of a blue/green roof system, permeable paving, tree pits and geo-cellular storage crates located beneath the paved areas around the base of the building. It is proposed that surface water runoff from the new development discharge into the 381mm diameter Thames Water combined sewer in Ilderton Road at a maximum total rate of 5.0 l/s. This has been deemed satisfactory by the Council's Flood Risk Management Team. Two conditions are recommended, one requiring details of the final surface water drainage system to be submitted prior to commencement of the development, and the other requiring submission of a verification report prior to occupation.

609. As a precautionary measure, the Section 106 Agreement will include an offset obligation in the event that the finalised drainage system fails to achieve greenfield rates of run-off cannot (to be confirmed by the verification report referred to above). The contribution will be calculated at a rate of £366 per cubic meter.

Land contamination

610. The application was accompanied by a preliminary Land Contamination Risk Assessment, which the Council's Environmental Protection Team has assessed and deemed acceptable. A condition is to be imposed requiring a Phase 2 investigation to be conducted and the results submitted to the Council for approval, with further remediation measures to apply if contamination is found to be present.

Basement-related impacts

611. A Basement Impact Assessment (BIA) was submitted with the application. The BIA concludes that there will be limited risk to the development and/or neighbouring properties associated with land and slope instability as a result of the adjacent railway embankment. This will be mitigated by the design of the substructure for specified ground movement limits and appropriate monitoring

during construction. The BIA also concludes that any dewatering required as part of the basement excavation will be designed by specialist contractors such that there will be no significant impacts to surrounding structures and other third party assets.

612. The Council's Environmental Protection Team has assessed the BIA and raised no objections. A compliance condition is recommended to ensure the basement is constructed as per the methodological principles and with all mitigation measures implemented where necessary. A Section 106 obligation relating to an Approval in Principle (AiP), due to the proximity of the basement to the public highway, is also recommended.

Wind microclimate

613. London Plan Policy D9 requires all tall building proposals not to cause changes to the wind environment that would compromise comfort and the enjoyment of open spaces around the building and in the neighbourhood. Southwark Plan Policies P14 and P56 require wind effects to be taken into consideration when determining planning applications, as does Policy P17 where the proposal is a tall building.

614. The applicant's Wind Microclimate Report submitted in support of the application considers the following scenarios:

- Scenario 1 – existing baseline.
- Scenario 2 – proposed development in the 'Existing Surrounds, with Mitigation'
- Scenario 3 – proposed development in the 'Future Surrounds, with Mitigation' (the cumulative scheme that fell within the extent of the wind tunnel model is the Surrey Canal Triangle scheme)

615. Wind conditions have been categorised using the Lawson Comfort Criteria and the predicated wind conditions compared against the intended pedestrian uses.

616. The Wind Microclimate Report finds that, following the introduction of the proposed development with mitigation, wind conditions are predicted to meet the safety criteria within the site and nearby surrounding area, and are predicted to be substantially suitable for existing and planned pedestrian uses. This compliance with the safety criteria applies at ground level, on balconies, and on the high-level communal outdoor spaces. When the cumulative developments (plus the on-site mitigation) are factored-in, the conclusion remains that wind conditions would meet the safety criteria. This represents an improvement on the extant consent, where one instance of 'unsafe frail' wind conditions arose on the platform of South Bermondsey station and was incapable of being mitigated.

617. Notwithstanding that all areas in and around the new proposal would be safe from wind effects, it should be noted that there would be one part of the site where, even with the cumulative developments (plus the on-site mitigation) factored-in, the comfort criteria for the anticipated use would be exceeded. This

exceedance occurs on a small area at the northern edge of the podium linking Block A to Block B; in this location conditions would be comfortable for strolling but not for standing. This is an isolated and minor exception that would not affect the overall useability of the podium.

618. In conclusion, all reasonable wind and microclimate mitigation measures have been implemented to bring the wind conditions surrounding the proposed development to a level that is safe in all instances.

Air quality

619. An Air Quality Assessment was submitted with the application, which considers the air quality impacts arising from the construction and operational use of the development, taking into account all relevant local and national guidance and regulations

620. In terms of the construction phase, the Outline Construction Environmental Management Plan sets out a range of mitigation. Proposed measures include locating machinery and dust causing activities away from receptors, covering skips where there is risk of dust dispersal, installation of hoarding/fencing with wind nets around the site perimeter, damping down and hosing regularly, and ensuring all on-road vehicles comply with the London Low Emission Zone requirements.

621. The proposed building itself would be all-electric (meaning there would be no on-site combustion), which mitigates air quality issues and facilitates significant advances towards zero carbon in future decades as the National Grid continues to decarbonise

622. The Air Quality Assessment concludes that, subject to the proposed mitigation measures, the effects on air quality during construction and operation are considered to be negligible. The Council's Environmental Protection Team has reviewed the Air Quality Assessment and, noting the proposal would meet 'Air Quality Neutral' requirements, has raised no objection.

Agent of change

623. Where new residential and other sensitive uses are proposed close to existing noise- and other potentially nuisance-generating development, Policy D13 of the London Plan requires the proposal, as the incoming ‘agent of change’, to be designed to mitigate and manage any impacts from existing sources on the future users/occupiers. Developments should be designed to ensure that established noise and other nuisance-generating uses remain viable and can grow without unreasonable restrictions placed on them.

624. Adjoining the site to northwest is Mehmet’s Tyre Shop, which provides car repair/maintenance services. Some of the activities take place in the open air yard to the front of the Tyre Shop site. Through the following design measures and planning mitigation, the day-to-day business activities at this adjoining premises would not be prejudiced:

- minimising the number of habitable rooms in the North Building that face towards the common boundary;
- setting back the North Building from the boundary to create a separation gap;
- detailing the facades and glazing in response to the ambient background noise levels locally; and
- attaching planning conditions to the decision notice to ensure the PBCL premises are fitted out to achieve certain levels of resistance to noise disturbance.

625. Other nearby uses sensitive to 'agent of change' include Millwall Football Club, the Christ Apostolic Church, the railway lines to the east of the site and the bus routes to the west. All proposed residential units would be specified to ensure reasonable resistance to sound such that these nearby noise-generating uses would not be at risk of having their operations compromised and/or any future growth unreasonably curtailed. No issues are foreseen in respect of the nearby uses and public transport services being unable to function/coexist with and grow alongside the proposed non-residential uses.

Light pollution

626. With respect to light pollution from interior sources, no undue effects would result from the occupation of the proposed commercial and residential uses.

627. With respect to light pollution from exterior sources, buildings close to existing residential uses are not typically fitted with external lighting above ground floor level in the interests of minimising amenity harm to the surroundings. The majority of lighting additions on the facades of the proposed North and South Buildings would be set no higher than ground level, and not in close proximity to surrounding residential dwellings. Although the applicant proposes some exterior illumination at crown level, this would take the form of soft and unobtrusive downlighting. As such, there is minimal risk of overspill harmful to residential amenity.

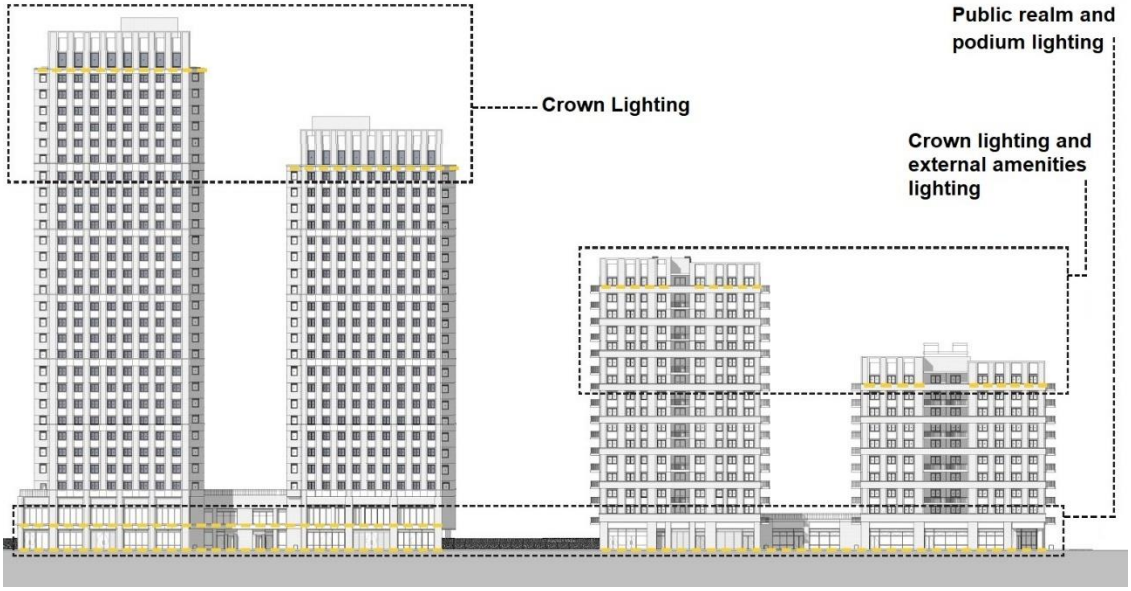


***Image 96** (above): Indicative proposals for the location of external lighting.*

628. The proposed development would include lighting within the high-level gardens at both the North and South Buildings. This will be a mix of trellis catenary lighting over the dining tables, wall lights and low bollards, alongside lighting integrated into seating, edges, and bollards. Specific trees may be up lit to create focal points in the gardens.

629. The applicant recognises that the east boundary is sensitive with respect to potential impacts on wildlife along the existing neighbouring embankment, which is a SINC. Lighting to the North Building eastern courtyards and the South Building access lanes will be appropriate to create a safe environment and low level to avoid spillage.

630. In summary, the proposal does not raise light pollution concerns. The final external lighting proposals, including any pre-determined dim-down and turn-off times, will be agreed through the Final Lighting Strategy, to be approved by the Council prior to first occupation of the building; this will be secured by condition.

Fire safety

631. Policy D12 of the London Plan expects all development proposals to achieve the highest standards of fire safety and to this end requires applications to be supported by an independent Fire Strategy, produced by a third party suitably qualified assessor.

632. A Fire Strategy was submitted with the application; this was replaced by an updated version when the proposed development was amended mid-way through the application process to incorporate a second stair. The updated Fire Strategy includes a matrix that assesses the scheme for compliance against the relevant parts of Policy D12. Among other things, the Fire Strategy confirms that:

- each building is provided with two escape stairs;

- the corridors that lead to all stairs on each floor would be separated, with all of these corridors fully ventilated to ensure sterility;
- all cores in both buildings would be designed as firefighting stair and lift cores;
- all stair and lifts would be accessed from fire protected lift lobbies;
- all lifts would be designed as dual purpose fire fighting and evacuation lifts;
- the staircases would be partitioned at ground floor to separate the basement staircase with the staircase serving the upper floors;
- all plant rooms and common rooms accessed from single direction escape would be provided with lobby protection to the residential corridor;
- a “defend in place” policy would apply for the conventional (Class C3) housing and PBCL residents, whereby only the apartment where the alarm originated will evacuate initially, but an evacuation alert system (EAS) will be provided to the building to allow for the progressive evacuation at the discretion of the fire service if required;
- disabled occupants would follow a ”stay-put” evacuation strategy;
- appropriate active fire protection system would be installed, including fire detection and alarm, emergency lighting and signage, sprinklers and smoke control systems;
- in the case of an emergency, the evacuation lift would switch from its everyday use to becomes a tool only for the evacuation of persons with disabilities and is not considered a general escape route;
- Building Regulations Approved Document B compliance would be achieved; and
- the internal layout would achieve compliant travel distances.

633. The Fire Strategy was produced by fire risk engineering consultancy Jensen Hughes. The contents of the document have been checked and approved by a certified fire risk engineer (a Member of the Institution of Fire Engineers (MIFireE)), with an accompanying declaration made at 1.5 of the document.

634. On account of the above, the relevant fire risk minimisation policies of the London Plan are deemed to have been satisfied. HSE was consulted on the application and raised no objections, although the consultation response highlights that there are some matters requiring resolution at later (post-planning) regulatory stages.

635. A condition is recommended to ensure the construction and in-use operation of the building are carried out in accordance with the Fire Strategy.

Energy and sustainability

636. Chapter 9 of the London Plan deals with all aspects of sustainable infrastructure and identifies the reduction of carbon emissions as a key priority. Policy SI2 “Minimising Greenhouse Gas Emissions” requires all developments to be net zero carbon with a minimum on-site reduction of 35% against the Part L 2021 baseline for both commercial and residential uses,

Where developments are unable to meet net zero carbon targets any shortfall between the minimum 35% and zero carbon must be mitigated by way of a payment towards the carbon offset fund. The energy strategy for new developments must follow the London Plan hierarchy (comprising 'be lean', 'be clean', 'be green' and 'be seen') and this must be demonstrated through the submission of an Energy Strategy with applications, as well as post construction monitoring for a period of 5 years.

637. Southwark Plan Policies P69 and P70 pursue the 'lean, green, clean and seen' principles of the London Plan and require non-residential buildings to be zero carbon with an on-site reduction of at least 40% against the Part L 2021 baseline. Any shortfall must be addressed by way of a financial contribution towards the carbon offset fund.

Energy and carbon emission reduction

Be Lean

638. In terms of meeting the 'be lean' tier of the hierarchy, a range of passive and active measures are proposed. The passive measures include:

- optimising glazing to limit solar gains, maintain fabric performance, and encourage the benefits of daylighting;
- specifying high performance opaque envelope elements;
- specifying efficient double-glazed windows;
- improving airtightness;
- maximising passive ventilation potential;
- specifying low G values to reduce unwanted solar gains; and
- recessing windows as much as possible to provide added solar shading.

639. The active measures include:

- using low energy proposed lighting throughout;
- specifying low energy light fittings with auto on / auto off presence detection where appropriate elsewhere in the development;
- installing energy efficient heat recovery ventilation systems;
- supplying the co-living studios with domestic hot water via air source heat pumps.

640. These 'demand reduction' measures will achieve a 15% reduction in carbon emissions for the residential uses, which exceeds the policy target of 10%. The measures will also achieve a 17% reduction in respect of the non-residential uses, which exceeds the policy target of 15%. Overall, the site-wide reduction through Be Lean measures is 16%.

Be Clean

641. The site is within an area identified as having district heating potential and is within a local heat study area, as identified within the London Heat Map. However, no district heating network with connection opportunities exists at the current time. As such, all parts of the development would be served by a centralised energy centre, which itself would draw from a centralised air-source heat pump system (ASHP).

642. By designing-in a futureproofed plant room at basement level, the opportunity to link the development into a wider district heating system would be safeguarded. This meets the requirements of Policy SI 3 of the London Plan.

643. As no immediate connection to a district heating network is proposed, no carbon savings are reported from the 'be clean' stage of the energy hierarchy.

Be Green

644. With respect to the 'be green' tier of the hierarchy, the applicant has proposed the following technologies:

- air source heat pumps (on the roofs of the North and South Buildings) to supply heat and hot water; and
- approxaimtely 420 square metres of photovoltaic panelling with a peak capacity of 77kWp (to be located on the south face of the roofs of the North and South Buildings) to supply direct current electricity.

645. These 'be green measures' would reduce carbon emissions by 56% for the residential uses and 7% for the non-residential. On a side-wide basis, this equates to a reduction of 39%. The applicant has demonstrated that opportunities for renewable energy by producing, storing and using renewable energy on-site have been maximised.

Be Seen

646. Introduced as part of the London Plan 2021, 'be seen' is the newest addition to the GLA's energy hierarchy. It requires developments to predict, monitor, verify and improve their energy performance during end-use operation. All applications should conduct a detailed calculation of unregulated carbon emissions as part of the compliance with the 'be seen' policy and associated guidance.

647. The applicant's Energy Statement calculates that unregulated per annum energy emissions for the development would be 35.95kWh/m2.

648. The applicant's Energy Statement states that a suitable metering strategy will be implemented to record energy consumption and generation from the point at which the different uses within the development are occupied. It is recommended that the on-going requirements for monitoring energy consumption and generation, and the associated reporting to the GLA in line with policy, be secured through a planning obligation.

Total energy savings

649. Southwark Council's carbon offset cost is £95 for every tonne of carbon dioxide emitted per year over a period of 30 years. This is the equivalent of £2,850 per tonne of annual residual carbon dioxide emissions.

650. The proposal would reduce on-site regulated carbon dioxide emissions by 74% over a notional building minimally compliant with the Building Regulations 2021, which is above the 40% on-site target. The 74% savings comprise 72% for the
domestic element and 24% for the non-domestic element.

651. The performance is summarised in the below table:

Development CO2 Emissions from each stage of the Energy Hierarchy: Summary table			
	Total Regulated Emissions	**CO2 Savings**	**Percentage saving**
Part L 2021 Baseline	232.2 tonnes CO2		
With **Be Lean** applied	195.2 tonnes CO2	37.1 tonnes CO2	16%
With **Be Clean** applied	105.2 tonnes CO2	0	0
With **Be Green** applied	104.5 tonnes CO2	90.6 tonnes CO2	39%
Cumulative saving		**127.7 tonnes CO2**	**55%**
Shortfall on carbon zero	**104.5 tonnes CO2**		

652. The energy savings, as detailed above, which take into account the decarbonisation of the electricity grid, demonstrate the good environmental and sustainability credentials of the proposed development. The total per annum shortfall in savings relative to carbon zero would, at a rate of £95/tonne for 30 years, generate an offset contribution of £297,932. The offset contribution will be secured in the Section 106 Agreement, with appropriate adjustment clauses should there be any improvements to the carbon emissions in the post-planning design development stages.

Whole life cycle and carbon capture

653. London Plan Policy SI2 requires all major development proposals to be supported by a whole life cycle carbon assessment. This assesses the embodied and operational emissions associated with redevelopment.

654. 'Embodied carbon' is the term used to describe the carbon emissions associated with:

- extraction and manufacturing of materials and products;

- in-use maintenance and replacement;
- end of life demolition, disassembly and disposal; and
- the transportation relating to all three.

655. 'Operational carbon' is the carbon dioxide associated with the in-use operation of the building. This usually includes carbon emissions associated with heating, hot water, cooling, ventilation and lighting systems, as well as those associated with cooking, equipment and lifts.

656. Driven by the aim of achieving net carbon zero for new development by closing the implementation gap, whole life cycle carbon assessments are monitored at the pre-application, submission and post-construction stages. Policy P70 of the Southwark Plan reinforces the need to calculate whole life cycle carbon emissions through a nationally recognised assessment and demonstrate actions taken to reduce life cycle carbon emissions.

657. The submitted whole life carbon assessment for this planning application considers the operational carbon and embodied carbon of the proposal throughout its life from construction, use and deconstruction. The table below summarises what the assessment finds over a 60-year study period, relative to the GLA's benchmarks and aspirational benchmarks:

Estimated Whole Life Carbon Emissions against GLA Benchmarks: Summary table			
	Module A1-A5, excluding sequestered carbon ($kgCO_2e$)	**Module B-C, excluding sequestered carbon ($kgCO_2e$)**	**Modules A–C, excluding B6 & B7, including sequestered carbon ($kgCO_2e$)**
Total $kgCO_2e$	40,561,025	10,136,769	49,943,128
Total $kgCO_2e/m^2$ GIA	**855**	**214**	**1,053**
WLC benchmark	<850	<350	<1200
Aspirational WLC benchmark	<500	<300	<800

658. As the above table shows, the proposed development falls marginally short for Modules A1-A5 but exceeds the aspirational benchmark for Modules B-C. On balance, and given that across all modules the proposal would be significantly below the WLC benchmark of 1200 kgCO2e, the performance is considered acceptable.

659. Two conditions to require two further stages of whole life-cycle carbon assessment in the detailed design and completion stages are proposed

Circular Economy

660. Southwark Plan Policy P62 states that a Circular Economy Statement should accompany planning applications referable to the Mayor. Circular economy principles include conserving resource, increasing efficiency, sourcing sustainably, designing to eliminate waste and managing waste sustainably at the highest value. London Plan Policies GG5, D3 SI7 and all mention circular economy principles and the benefits of transitioning to a circular economy as part of the aim for London to be a zero-carbon city by 2050.

661. A detailed Circular Economy Statement was submitted with the application, which sets out strategic approaches, specific commitments and the overall implementation approach.

662. The broad strategic approaches for the development include adopting lean design principles, minimising waste, specifying materials responsibly and sustainably, and designing for longevity, adaptability and flexibility. Ways this will be achieved include:

- minimising material use through prefabrication off-site using a modular and modern methods of construction approach (this is Tide's Volumetric system, which allows approximately 65% of the building to be pre-fabricated off site in a controlled factory environment);
- utilising lightweight cladding to minimise foundation sizes;
- using materials with recycled content specification (such as FSC and PEFC certified timber);
- basing the floorplate configurations on standard modules in terms of columns and core placement, avoiding curves and maximising standard approaches
- ensuring layouts can be converted to alternative uses (for example, the PBCL being able to be repurposed as student or hotel accommodation), without requiring fundamental changes to the buildings' life safety or auxiliary systems.
- making design and material selections in keeping with future weather requirements for better thermal performance and energy efficiency; and
- specifying and sourcing materials responsibly, for example through the implementation of the principles of the BRE Green Guide to Specification.



***Image 97** (above): Future adaptability study, showing how —by being designed to accommodate knock out and infill panels— the upper floors of Blocks A and B could be converted from cellularised PBCL studios into conventional (Class C3) dwellings in a mix of sizes with a good overall dual aspect performance rate.*

663. Specific targets committed to by the applicant include:

- diverting at least 95% of the waste from going into landfill or for incineration;
- making beneficial use of at least 95% of excavation waste; and
- ensuring the contractor prepares and implements a Site Waste and Resource Management Plan (SWMP/RMP).

664. The application has addressed the requirements of London Plan Policy SI7, Southwark Plan Policy P62, and has referenced the GLA's guidance in producing the Circular Economy Statement. Conditions are proposed requiring post-completion reporting. Subject to these conditions, the proposal is considered to comply with the sustainable materials element of Policy P17.

Overheating and cooling

665. London Plan Policy SI4 details that major development proposals should demonstrate how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy. Policy P69 of the Southwark Plan states that development must reduce the risk of overheating, taking into account climate change predictions over the lifetime of the development, in accordance with the cooling hierarchy.

666. The six-step hierarchy that should be followed when developing a cooling strategy for new buildings is as follows:

- minimise internal heat generation through energy efficient design; then
- reduce the amount of heat entering the building through the orientation, shading, albedo, fenestration, insulation and green roofs and walls; then
- manage the heat within the building through exposed internal thermal mass and high ceilings; then
- use passive ventilation; then
- use mechanical ventilation; then
- use active cooling systems (ensuring they are the lowest carbon options).

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

Minimise internal heat generation

668. In both the residential and non-residential elements of the development, internal heat generation is to be minimised through measures including low energy lighting (to reduce lighting gains), low heating system water temperatures, and applying insulation to the communal pipework in excess of the Building Regulations and British Standards enhanced specification to avoid distribution losses.

Reduce heat entering the building

669. The heat entering the proposed development is to be reduced by a combination of measures. These include solar control glazing incorporating a G value of 0.3, orienting the buildings so that rooms are mainly east- or west-facing, proposing deep reveals to windows and doors, ensuring the communal pipework is laid out efficiently, and installing biodiverse roofs to reduce heat gains from the exposed roof.

Manage the heat within the building

670. Good floor-to-ceiling heights are proposed in both the residential and non-residential parts of the proposed development. Concrete core and ceilings have been utilised to assist with thermal mass.

Use passive ventilation

671. With regard to the residential uses specifically, a number of passive ventilation measures are proposed. These include optimising the number of dual aspect units in the South Building to facilitate good cross-ventilation. Where single-aspect apartments are proposed in the South Building, full height balcony doors/windows would aide single sided ventilation. Additional passive measures used in both the North and South Buildings include trickle vents, which would provide background ventilation even when the windows are closed

672. Turning to the commercial uses, for which equipment and occupancy gains are two most common sources of overheating risk, the proposed passive measures include designing as many of the commercial units as possible to be dual aspect with windows and doors deeply recessed.

673. Notwithstanding these efforts, passive measures alone would not be sufficient to overcome the risk of overheating in the commercial spaces. As such, the applicant had to proceed to stage 5 of the cooling hierarchy (as discussed below).

Use mechanical ventilation

674. Mechanical ventilation (in the form of high efficiency MVHR) is proposed in both buildings for general year-round ventilation, and will be capable of being boosted when required via an occupant switch. With these systems in place, in no part of the proposed residential uses (i.e. the PBCL and conventional

housing) would active cooling be required to supplement this mechanical cooling.

675. Notwithstanding the incorporation of mechanical ventilation, the modelling returned failings in the communal residential amenity spaces of the scheme as well as in the three commercial units. As such, the applicant had to move to stage 6 of the cooling hierarchy.

Use active cooling systems (low carbon)

676. In order that the communal residential amenity spaces of the scheme as well as the three commercial units would avoid overheating risk throughout the year, active cooling within these particular parts of the development would be required. This active cooling would take the form of low 'global warming potential' (GWP) Variable Refrigerant Flow (VRF) system.

Summary

677. Following the cooling hierarchy, the applicant has demonstrated that the building cooling demand has been kept as low as possible with minimal solar gains. Active cooling is proposed for the non-residential parts of the development as well as within the communal amenity space because –due mainly to the overheating risks associated with equipment and occupancy gains– natural ventilation alone would not be sufficient to guarantee the occupiers' and users' comfort, in line with the criteria set out in CIBSE TM 52 guidance. With the proposed measures taken into account, the overall building efficiency would be enhanced. This is considered to be in compliance with London Plan Policy SI4 and Southwark Plan Policy P69.

BREEAM

678. Policy P69 of the Southwark Plan states that non-residential development must achieve a BREEAM rating of 'Excellent'. The applicant's BREEAM indicates 'Excellent' can be achieved, and a planning condition is recommended to secure this.

Water efficiency

679. The Sustainability Strategy submitted by the applicant confirms that the proposed development aims to minimise water consumption such that the BREEAM excellent standard for the 'Wat 01' water category would be achieved, as required by London Plan Policy SI5. This will be achieved through:

- the specification of features such as water-efficient sanitary fittings;
- each meter (main and sub) having a pulsed output or other open protocol communication output to enable connection to appropriate utility monitoring and management system; and
- a leak detection system.

Communications and aviation

Digital connectivity infrastructure

680. The NPPF recognises the need to support high-quality communications infrastructure for sustainable economic growth and to enhance the provision of local community facilities and services.

681. To ensure London's long-term global competitiveness, Policy SI6 "Digital Connectivity Infrastructure" of the London Plan requires development proposals to:

- be equipped with sufficient ducting space for full fibre connectivity infrastructure;
- achieve internet speeds of 1GB/s for all end users, through full fibre connectivity or an equivalent.
- meet expected demand for mobile connectivity; and
- avoid reducing mobile capacity in the local area.

682. The applicant's Electromagnetic Interference Assessment confirms in writing that the development would have the incoming duct arrangements to suit the provisions from the local networks, or that by the time construction works are underway 1GB/s fire should be available. To ensure the requirements of Policy SI6 have been met post-decision, a Digital Connectivity Strategy planning condition will be attached to the decision notice.

Television, radio and telecommunications networks

683. The NPPF requires local planning authorities to consider the potential for new development to interfere with broadcast and electronic communications services, and to mitigate this adequately. Part C of London Plan Policy D9, which is concerned with the functional impacts of tall buildings, echoes this, requiring that "buildings, including their construction, should not interfere with […] telecommunication".

684. The applicant has submitted an Electromagnetic Interference Assessment in support of their application. This document finds that, with regard to both the construction stage (involving the use of tower cranes) and the proposal itself once built, there could be disruption to the reception of digital satellite television services (i.e. Freesat and Sky) in the area immediately northwest of the North Building. If interference were to occur, the repositioning of satellite dishes to new locations without an obscured line of sight view to the serving satellites would restore all services. If satellite dish relocations were not feasible, the use of DTT receiving equipment (or television over Internet Protocol / fibre, broadband or cable reception equipment and smart apps) would also offer any affected viewer an alternative source of digital television broadcasts.

685. Arqiva was consulted on the planning application and responded raising no concerns.

686. On balance, it is not considered that there would be any adverse harmful impacts.

Aviation

687. The NPPF recognises the need for new development to maintain the national network of general aviation airfields, and their need to adapt and change over time. Part C of London Plan Policy D9 requires tall buildings not to interfere with aviation or navigation. In airport safeguarding planning, if a proposed structure is 91.4 meters above ground level or taller, the Local Planning Authority must notify the Civil Aviation Authority (CAA), allowing them to assess potential impacts on aviation safety.

688. The CAA, NATS and the safeguarding divisions of relevant London airports were consulted on this planning application. The only consultee to respond, City Airport London, requested that a Construction Management Strategy (Aviation) be secured by condition in the event of planning permission being granted.

689. The extant permission at the site stood to a maximum height only 3 metres shorter than the 24/AP/3687 scheme. With this borne in mind, and given the height of this proposal relative to nearby consented tall buildings at the Surrey Canal Triangle site, together with the recommended inclusion of a Construction Management Strategy (Aviation) planning condition, the proposed tall buildings would not cause any harmful aviation impacts.

Socio-economic impacts

690. London Plan Policy E11 requires development proposals to support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases. This requirement is also covered by Southwark Plan Policy P28, with the methodology for securing these opportunities prescribed by the Council's Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015 with 2020 Update)

Direct on-site employment and training

691. In accordance with the policy framework, there would be a requirement for this development to deliver training and employment during the construction phase only. 107 sustained jobs, 26 construction industry apprentices and 107 short courses for unemployed Southwark Residents would be required. Due to Tide's business model being predicated on the Vision Volumetric system, which results in approximately 65% of construction taking place off-site, they are unable to commit to any of the 107 sustained construction jobs. A payment-in-lieu of £460,100 is proposed instead, potentially adjusted subject to further discussions with the Council's Local Economy Team should

sustained operational jobs be delivered in the completed development. Tide have expressed a willingness to deliver the 26 construction industry apprentices and 107 short courses; these will be delivered in accordance with a Construction Phase Employment, Skills and Business Plan. These obligations will be secured through the Section 106 Agreement.

692. In terms of direct employment connected with the development once operational, the below table explains how a gross employment gain of up to 31 FTE roles is predicted:

Gross employment yield of the proposed development: Summary table				
Class	**Floorspace GIA (sq.m)**	**Floorspace NIA (sq.m)**	**HCA jobs density**	**Number of FTE jobs**
Flexible Class E	396.0	391.0	1 per 20-15sq.m**	21-26
PBCL	33,432.5	21,976.0	N/A	5
Total of all uses:				26-31
Notes: *** This is based on applying the use class that has the highest employment density (retail, where 1 job is created by every 15-20 square metres of floorspace).*				

693. Given that the site's most recent use supported 5 jobs, the maximum FTE additionality from the site would, therefore, be 26 jobs.

Indirect employment

694. A further consideration is indirect local job creation (for example, because of the 'traction' effect of large-scale redevelopments). Factoring-in the displacement of economic activity from elsewhere in the borough that typically occurs from new direct employment, the 79-161 Ilderton Road proposal has the potential to create up to 10 indirect net jobs. This would bring the total gross job creation (i.e. direct and indirect) resulting from the development to as many as 41 FTE positions.

Local catalyst effects

695. The new households accommodated on-site will contribute through the generation of increased expenditure on household goods (e.g. food and drink), education, recreation and culture. The applicant's Economic Benefits Statement estimates that once the development is fully occupied, £36.7 million of gross additional household expenditure (i.e. by residents of both affordable housing and PBCL) will accrue annually, which businesses in the immediate surroundings and the borough more widely may be beneficiaries of. This expenditure will support the vitality and viability of businesses and sustain employment locally (i.e. over and above the additional direct and indirect FTE jobs). Moreover, this expenditure has the potential to catalyse demand in the

Ilderton Road area for new shops, cafés, restaurants and other local amenities.

Fiscal impact

696. Once completed, the 79-161 Ilderton Road development will generate business rates and council tax payments. This will provide Southwark Council with additional revenue through the UK Government's business rates retention scheme, helping to fund the running of the Council, in addition to enabling investment in important local infrastructure and/or services.

697. With regard specifically to business rates revenue, drawing on the anticipated uses within the proposed development and rateable values for similar uses within the local area, it is estimated that £75,000 - £100,000 would be generated each year.

698. With regard to the homes at 79-161 Ilderton Road, taking account of Southwark's Council Tax charges for 2024/25, it is estimated that £1.9 million in additional revenue could accrue to the Council each year in perpetuity.

Social and community integration

699. The strategic policies of the Southwark Plan, in particular Policies ST1 and SP2,
expect new development proposals to foster mixed and integrated communities,
noting that environments should seek to promote inclusivity and interaction to help achieve this.

700. PBCL developments, in introducing a large number of single individual households into a neighbourhood, can prove more challenging to integrate into their local community than traditional family housing. Cognisant of this, and mindful of other consented and proposed developments nearby bringing forward PBCL and student accommodation, the applicant has proposed the inclusion of flexible community and commercial space within the development, the latter including a unit sized specifically for occupation by a convenience store. These environments would enable day-to-day impromptu interaction to occur between the residents of the two different typologies.

701. On-site residents and members of the wider community would also benefit from the pocket park, the size of which has increased in absolute terms (168 square metres) relative to the consented scheme. This will have positive effects in enabling the different residential populations of the development to interact and meet.

702. For these reasons, it is considered that the applicant has made adequate efforts
to respond to the strategic objectives of the Southwark Plan and London Plan to integrate the 865 PBCL occupiers with the future resident community as well as the wider existing residents. It is not considered on balance that the

865 PBCL residents this scheme would introduce would give rise to an imbalanced, unintegrated or mono-cultural community.

Planning obligations

703. London Plan Policy DF1 and Southwark Plan Policy IP3 advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. These policies are reinforced by the Section 106 Planning Obligations and CIL SPD, which sets out in detail the type of development that qualifies for planning obligations. The NPPF echoes the Community Infrastructure Levy Regulation 122 which requires obligations to be:

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

704. In accordance with the Section 106 Planning Obligations and CIL SPD, a suite of contributions have been agreed with the applicant in order to mitigate the impacts of the development. These are listed in detail at Appendix 7 of this report. In summary, the financial contributions (which total £2,073,060.76) are:

- Active Travel Improvements Contribution: (£100,000.00)
- Affordable Housing Monitoring Contribution (£24,645.00)
- Archaeology Monitoring Contribution (£11,171.00)
- Bus Services Contribution (£1,282,500.00)
- Children's Play Space Contribution (£52,865.10)
- Construction Management and Monitoring Contribution (£19,000.00)
- Cycle Hire Docking Station Contribution (£25,700.00)
- Delivery and Servicing Monitoring Contribution (£1,600.00)
- External Amenity Space In-Lieu Contribution (£96,719.00)
- Habitat Management and Monitoring Contribution (£12,874.00)
- New Ilderton Road Park Maintenance Contribution (£25,000.00)
- Old Kent Road Public Open Space Contribution (£339,480.00)
- Specialised/accessible Car Club Vehicle Contribution (£20,000.00)
- TfL Cycle Hire Docking Station (£23,716.66)
- TfL Legible London Signage (£32,000.00)
- Travel Plan Monitoring Contribution (£2,790.00)

705. A sum will also be secured in the Section 106 agreement to cover the Local Planning Authority's costs of monitoring these obligations (with the exception of those that have monitoring contributions already factored-in, as listed in the above paragraph).

706. A number of contingent/default financial obligations will also apply. These will require a financial contribution in the event of a failure to deliver all or part of the following development benefits/mitigation:

- Carbon Green Fund Contribution 1 (£297,825.00)

- Agreed greenfield run-off rates;
- Agreed delivery and servicing baseline activity;
- Agreed number of construction employment, training and apprenticeships; and
- Agreed number of new trees.

707. Appendix 7 should be referred to for the full detailed set of the obligations sought to mitigate the development's impacts. Many of the obligations, although not a financial contribution per se, are extensive in nature. The appendix also include the applicant's current position in relation to each of these requested obligations

708. In the event that a satisfactory legal agreement has not been entered into by 14th August 2025, it is recommended that the Director of Planning and Growth refuses planning permission, if appropriate, for the following reason:

"The proposal, by failing to provide for appropriate planning obligations secured through the completion of a S106 agreement, fails to ensure adequate provision of mitigation against the adverse impacts of the development through projects or contributions, contrary to: Policy DF 1 'Planning Obligations' of the London Plan 2021; Policy IP3 'Community Infrastructure Levy (CIL) and Section 106 Planning Obligations' of the Southwark Plan; and the Southwark 'Section 106 Planning Obligations and Community Infrastructure Levy SPD' 2015 (with 2017 addendum)".

Mayoral and Borough Community Infrastructure Levies

709. Section 143 of the Localism Act states that any financial contribution received as community infrastructure levy (CIL) is a material "local financial consideration" in planning decisions. The requirement for payment of the Mayoral or Borough CIL is therefore a material consideration. However, the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport investments in London as a whole, while the Borough CIL will provide for infrastructure that supports growth in Southwark.

710. The site is located within Southwark CIL Zone 2 and MCIL2 Band 2 Zone. The gross amount of CIL is approximately £18,576,943.69 (pre-relief). Subject to the correct CIL forms being submitted on time, CIL Social Housing Relief of approximately £6,310,791.06 can be claimed for a number of types of affordable housing. Thus, the resulting CIL amount is estimated to be £12,266,152.63 (net of relief). It should be noted that this is an estimate, and the floor areas on approved drawings will be measured and checked when related CIL Assumption of Liability and Relief Claim Forms are submitted, after planning approval has been secured.

Development description

711. The proposed development was originally:

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

For information: the proposed development comprises a building of 29 storeys plus additional rooftop plant/access (95.02 metres above ground level, 95.97 metres above Ordnance Datum) and a building of 16 storeys plus additional rooftop plant/access (54.88 metres above ground level, 55.68 metres above Ordnance Datum), with each building containing a single storey basement. The development would deliver:
- 865 LSPBSL units (Sui Generis use);
- 186 affordable conventional residential dwellings (Class C3 use);
- 396 square metres GIA of flexible commercial floorspace (Class E/F use);
- children's playspace and public realm improvements; and
- other associated works incidental to the development".

712. Post consultation, the Local Planning Authority and applicant agreed to simplify the development description (refer to the title block of this report for the exact wording). Separately, Condition 2 (Scope of Works) of the draft decision notice describes the key elements of the proposal in more detail, including with use class references.

713. This arrangement of an accurate but simplified development description supported by a more specific Scope of Works condition responds to the Court of Appeal's reversal of the High Court's decision in Finney v Welsh Ministers [2019] EWCA Civ 1868. It will enable the applicant to seek amendments to the extant consented proposal by varying Condition 1 (under Section 73 of the Town and Country Planning Act) without any risk of the sought variation conflicting with the development description. Had the development description remained in its original very detailed format, any changes the applicant later wished to make falling outside the wording of the operative part of the grant would have necessitated the submission of a fresh full planning application.

Community involvement and engagement

714. This application was accompanied by a Statement of Community Involvement, confirming the public consultation that was undertaken by the applicant during the pre-application phase. The table below summarises this consultation:

Consultation Undertaken by Applicant: Summary Table	
Date	**Form of consultation**
Meetings (Pre-application engagement)	

Various dates in 2024	• The applicant wrote to political and community stakeholders, informing them of the proposals and offering to meet. These stakeholders were: • Cllr. Kieron Williams • Cllr. Helen Dennis • Cllr. Evelyn Akoto • Cllr. Richard Livingstone • Cllr. Michael Situ • Cllr. Kath Whittam • Neil Coyle MP • Miatta Fahnbulleh MP • Vicky Foxcroft MP • Marina Ahmad GLA • Christ Apostolic Church Surrey Docks • Circle Collective • Community Southwark • Ilderton Primary School • Millwall FC Community Trust • Southwark Travellers' Action Group • Tustin Community Association (TCA) • Vital OKR • Education Business Alliance • Cavendish School • Galleywall Primary • Poppy's Day Nursery • CCC Mission of God Parish • COSEC Ministries International • Family Love Ministries • Jesus Sanctuary Ministries • Jubilee Christian Centre • Manor Methodist Church • St Gertrude's Church
Public Consultation Events (pre-application phase)	
October 2024	• Distribution of a leaflet advertising the plans and the consultation event to 4,266 local residential and business addresses. • Door-knocking of 200 homes at Tustin Estate and at homes that directly neighbour the site. • Display of posters (containing an image of the development were) on the fencing enclosing the site.
November 2024	• Public exhibition held at Lions Centre, Millwall Community Trust on Wednesday 20 November

	2024 from 4-8pm, where feedback forms were available. • Launch of a dedicated website (*https://ildertonroad-tide.com*), including a feedback form.

715. Included within the Statement of Community Involvement are the consultation materials that were circulated as part of the pre-application engagement exercise. A summary of each topic raised by the community feedback is also provided, along with details of how the applicant responded.

716. The pre-application consultation undertaken by the applicant was an adequate effort to engage with those affected by the proposals.

717. No direct community engagement was undertaken by the applicant at the planning application stage.

718. The Council, as part of its statutory requirements, sent letters to surrounding residents, issued a press notice publicising the planning application and displayed notices in the vicinity of the site. Details of the consultation undertaken by the Council are set out in the appendices. The responses received are summarised earlier in this report.

Consultation responses from external consultees

Arqiva

719.
- No objection.
  - ***Officer response:*** Noted.

Active Travel England

720.
- No objection.
  - ***Officer response:*** Noted.

City Airport

721.
- No objections, subject to the imposition of a Construction Management Strategy (Aviation).
  - ***Officer response:*** Noted.

City of London

722.
- No objection.

Civil Aviation Authority

723.
- Did not respond to consultation request.

Environment Agency

724.
- Conditions relating to Contamination Remediation, Contamination Verification, and a Piling Statement should be secured.
  - ***Officer response:*** The recommended conditions have been attached to the draft decision notice.

Greater London Authority

725.
- Compliance with the principles of the Old Kent Road Phase 1 residential cap will determine whether any grant of permission will be subject to a Grampian obligation.
  - ***Officer response:*** An earlier part of this report explains why 24/AP/3687 can be counted as Phase 1 scheme, thereby negating any Grampian condition.
- GLA officers, mindful of obligations under the Equality Act 2010, are satisfied with the approach taken to assessing potential impacts on the Traveller community, Christ Apostolic Church and Full Gospel Church.
  - ***Officer response:*** Noted.
- Given the quantum and tenure of affordable housing proposed, the scheme qualifies for the Fast Track Route subject to this being appropriately secured in line with London Plan policy.
  - ***Officer response:*** Noted.
- With regard to urban design, the multi-functionality of the forecourt space to the South Building could be increased by providing seating alongside the planting features.
  - ***Officer response:*** The applicant has since amended the proposals to include seating.
- With regard to architecture, the appearance of the North Building is quite repetitive and flat, and additional depth should be provided. Further articulation of the vertical elements of the grid may assist.
  - ***Officer response:*** The applicant has made some changes to the side (winged) elevations and the depth achieved on the reveals of the cladding panels. These represent an improvement on the scheme as originally submitted.
- Additional subtle enrichment around the residential lobbies on the ground floor of the two buildings would improve this.
  - ***Officer response:*** The applicant has made some changes to the the depth achieved on the reveals of the cladding panels. These represent an improvement on the scheme as originally submitted. The detail can be secured through planning conditions.
- As some of the single aspect units are in locations where their outlook and daylight may be impacted, the applicant should re-consider the provision of single aspect homes in these locations and/or, where appropriate, provide a buffer to make a legible threshold between public and private space.
  - ***Officer response:*** The layout of the proposed dwellings is considered logical and efficient. Planting buffers are included in the

proposed podium spaces to reduce any risk of direct overlooking of private amenity spaces.

- In the North Building increased corridor widths, at least at key points, such as at the central core, would improve the comfort of the residents.
  - ***Officer response:*** The layout of the proposed floorplates is considered logical and efficient. Taking into account that the applicant has demonstrated how the corridors would be finished to engender a stronger sense of individuality to each front door and a warm and inviting 'feel' internally, it is not considered necessary to enlarge the corridor widths.
- Some of the accessible units in the North Building are at the lower end of the size band stated for the GLA's LSBPSL LPG. The applicant should address this or provide robust justification.
  - ***Officer response:*** The sizes are within the range deemed acceptable by the GLA. Given that the proposal contains a wide range of unit sizes, on balance the mix is considered acceptable.
- There would be no harm caused to conservation areas, listed buildings or LVMF Townscape View 23A.1.
  - ***Officer response:*** Noted.
- The Council is encouraged to secure the standard range of transport-related contributions and obligations, including necessary improvements for active travel, a bus services contribution and
  - ***Officer response:*** Al necessary transport-related obligations have been secured.
- Short and long-stay parking needs improving to ensure the quantity and quality meets the London Plan standards.
  - ***Officer response:*** The quantity of stands has increased since the GLA's Stage 1 report was issued. As detailed in an earlier part of this report, the proposed provision is now considered adequate, when accounting for the various other mitigation secured via planning conditions and obligations.
- Rainwater harvesting should be incorporated into the strategy; and the LPA should review SuDS maintenance arrangements, the assessment of exceedance flood flow routes and the appropriateness of pump discharges.
  - ***Officer response:*** Further amendments have been made to the drainage strategy since the GLA's Stage 1 report was issued. The Council's Flood Risk Management Team has reviewed these amendments, deeming them to be adequate.
- Further information is required on the Energy Statement, WLC and Circular Economy submissions.
  - ***Officer response:*** Further amendments have been made to the energy, WLC and Circular Economy submissions since the GLA's Stage 1 report was issued. The Council's Planning Policy (Energy) Team has reviewed these amendments, deeming them to be adequate.

<u>Heathrow Airport</u>

726. • No objection.

Historic England

727. • No objection.
  - ***Officer response:*** Noted.

London Borough of Lambeth

728. • Did not respond to consultation request.

London Borough of Lewisham

729. • Lewisham Council understands the proposed development is generally consistent with the original scheme approved for the site, 23/AP/0387.
  - ***Officer response:*** Noted.

• Regard should be given to the approved development at Surrey Canal Triangle (DC/20/119706) particularly in relation to daylight / sunlight, overshadowing and wind microclimate impacts.
  - ***Officer response:*** The applicant's Daylight and Sunlight Report does take into account the Surrey Canal Triangle scheme, and the effects are detailed in the relevant earlier part of this report. The impacts are considered to be acceptable.

• Lewisham Council would expect the development to make a proportionate contribution to any highways / pedestrian and cycling improvements required arising from the proposed scheme as part of a Section 106 financial contribution or Section 278 highway works.
  - ***Officer response:*** Improvement works have been agreed with the applicant, which will be partly delivered by way a Section 106 financial contribution and partly through Section 278 highway works. Some of the works agreed works will improve the pedestrian and cycle experience for those using John Berylson Way, which is the route closest to the site that provides a connection to Lewisham.

London Fire Brigade

730. • In LFB's view, the staircases and lift cores cannot be considered truly independent of one another due to their positioning (i.e. occupants would have to pass through one lift lobby to reach an alternative escape route e.g. Blocks C and D). While LFB acknowledge that some guidance allows for that, in this instance LFB recommend further consideration should be given to the layout, and particularly the effect of a lobby being potentially compromised by heat and smoke might have on occupants' ability to access the adjacent staircase.
  - ***Officer response:*** This concern was raised with the applicant, whose Fire Safety Assessor has formally responded in writing explaining that

the proposed layout conforms with the guidance, and that in their professional view the layout and lobby arrangement is robust and safe.

- LFB note the proposal for three lifts for Blocks A and B and two lifts only for Blocks C and D. A sufficient number of lifts should be available at all times for both firefighters' use and occupant evacuation. The design as currently proposed will, in LFB's view, have implications on those responsible for demonstrating the ongoing safety in the building.
  - ***Officer response:*** This concern was raised with the applicant, whose Fire Safety Assessor has formally responded in writing explaining that –while they accept that there can be different approaches to how ongoing safety can be demonstrated– the proposed lift provision is in their professional view robust and safe.

- LFB suggests that consideration be given to the storage (and potential charging) of electric bikes and electric scooters and the potential fire risk posed by these electric powered personal vehicles (EPPV)s. There is increasing evidence showing that EPPVs can spontaneously ignite and burn for extended periods so there is an increased potential for toxic gases/smoke/fire spread.
  - ***Officer response:*** This matter has been considered by the applicant, and is detailed in the 'Transport and Highways' section of this report.

- LFB has various other matters that they wish to draw the applicant's attention to generally / for the purposes of the Building Control submission that occurs at the post planning permission stage, namely:
  - guidance recommends cooking facilities are a minimum of 1.8m away from the escape route, with a minimum escape width of 0.9m.
  - further details are awaited, with suitable engineering analysis, at the Building Regulations Consultation stage regarding the Vision Volumetric system;
  - further details are awaited regarding the location of the sprinkler main control valve and the route by which this will be accessed, as well as further detailed proposals for balconies, terraces, and podiums;
  - applicant should bear in mind the additional recommendations for fire appliance access arrangements, firefighting facilities;
  - LBF highlight the benefit of designing all shafts/staircases as firefighting shafts, as this adds additional resilience and redundancy to the blocks.
  - LFB agrees with the applicant that a Qualitative Design Review will be required. As part of this, particular attention may need to be paid to the Vision Volumetric system and its performance in fire scenarios.
  - ***Officer response:*** These points have all been relayed to the applicant, who has noted them.

Metropolitan Police

731. • No objection subject to a two part 'Secured by Design' condition being applied.
  - ***Officer response:*** The suggested condition has been included on the draft decision notice.

National Air Traffic Services (NATS) Safeguarding

732. • No objection.
  - ***Officer response:*** Noted.

Natural England

733. • No objection.
  - ***Officer response:*** Noted.

Network Rail

734. • Network Rail would like to bring forward a second entrance for the South Bermondsey Station. This would ideally be adjacent to the site. However, at present there's no funded scheme or definitive timescale. Is there any prospect of reserving part of the 79-161 Ilderton Road site for a second station entrance?
  - ***Officer response:*** As per the Old Kent Road AAP 2020 and 2024 the intention is for the land adjacent to the application site (71-79 Ilderton Road) to deliver a second entrance to station, although Network Rail have identified that this will be a challenge to deliver due to need for a new platform and track realignment.

Old Kent Road Community Review Panel

735. It should be noted that the Community Review Panel took place prior to the planning application being submitted. As such, the comments from the Panel, as summarised below, are a reflection on the proposal at a less developed stage than the planning application:

- The Panel does not think that co-living on this scale is healthy or sustainable.
  - ***Officer response:*** Since the date of the CRP, the applicant has evolved the scheme to improve the overall size and range of communal amenity spaces within the North Building, and has refined the layouts of the individual studios. Overall, officers consider that the scale of the 865-dwelling PBCL premises would provide a sustainable and healthy form of housing for the future residents.

- The provision of social rented flats is welcome, but tenure types should not be visibly differentiated.
  - ***Officer response:*** Since the date of the CRP and in direct response to this concern raised by the Panel, the applicant took the decision to change the colouration of the finishing materials on the South

Building to match those on the North Building; this has brought a coordination to the two buildings, reducing any visible differentiation in the tenures.

- The Panel is concerned that PBCL will not meet the needs of the borough, and will create a transient community that does not integrate or contribute locally.
  - ***Officer response:*** As detailed in an earlier part of this report entitled 'Social and community integration', the applicant has proposed the inclusion of flexible community and commercial space within the development, the latter including a unit sized specifically for occupation by a convenience store. These environments would enable day-to-day impromptu interaction to occur between the residents of the two different typologies. In addition to this, the proposed Pocket Park will have positive effects in enabling the different residential populations of the development to interact and meet. Officers consider that these facilities will adequately foster community integration.

- The long-term impact and appeal of this relatively new typology has yet to be tested at such a large scale, and there is a risk of too many developments offering this type of living in the area.
  - ***Officer response:*** There is only one other PBCL development consented in the local area, and as such officers do not consider that there are grounds for an 'in principle' objection to co-living in this particular location due to overconcentration.

- The Panel also questions whether single aspect studios are liveable.
  - ***Officer response:*** By its very nature, PBCL development will inevitably contain some single-aspect dwelling units; however, this individual amenity impact is counterbalanced by the range of free-to-access communal facilities on offer to the residents, many of which will be dual aspect and offer good levels of amenity. The PBCL typology (whereby individual units are supported by wider communal facilities) is accepted as a form of housing by the Mayor and the Local Planning Authority, as reflected in the planning policies and guidance adopted by both of these bodies. As detailed in the relevant earlier part of this report, given that the single aspect studios proposed within the 79-161 Ilderton Road development would not be the only spaces available for day-to-day use by the future residents, the studios are considered to be liveable.

- If a co-living scheme is built, the Panel thinks that a smaller scheme with a mix of studio sizes would be more likely to create a strong, balanced community.
  - ***Officer response:*** The site is identified within the AAP for large-scale mixed-use redevelopment, to include tall buildings subject to all relevant design criteria being satisfied. As such, a smaller PBCL would not make efficient use of the land. In so doing, such a scheme

would fail to play its part in achieving the London-level and local development plan aspirations for the Opportunity Area.

- The arrival experience for residents needs further work across all blocks.
  - ***Officer response:*** Since the date of the CRP, the applicant has enriched the architectural quality of the lobby facades. The internal spaces immediately beyond the lobby doors have been refined, and changes have been made to the external forecourt spaces to include seating and soft planting. Officers consider the arrival experience to now be of a high quality.

- Windows should be designed to maximise privacy, minimise overheating, and be easy to clean.
  - ***Officer response:*** Officers consider that the finalised proposal has struck a successful balance between privacy, thermal comfort and ease of maintenance in the design of the windows.

- Homes should also provide sufficient storage.
  - ***Officer response:*** All homes provide adequate built-in storage.

- The Panel supports the off-site modular construction system, as it has multiple benefits including acoustic performance.
  - ***Officer response:*** Noted.

- The proposed height and massing are acceptable given the wider emerging context, and the reduction in the podium height [relative to the extant permission, 23/AP/0387] is successful.
  - ***Officer response:*** Noted.

- The Panel enjoys the detailing of the façades, which draws on the local context.
  - ***Officer response:*** Noted.

- The provision of commercial space is welcome, but independent local businesses should be given priority.
  - ***Officer response:*** As the proposed development is not causing any on-site businesses to be relocated (either temporarily or permanently), it is not considered necessary to require the applicant to prioritise allocation of any of the three new commercial units to local businesses.

- The Panel also suggests a community space to encourage social interaction.
  - ***Officer response:*** Since the date of the CRP, one of the commercial units has been proposed for a flexible commercial and/or community use.

- Proposed planting in the shared amenity spaces and the Pocket Park is positive, but maintenance will be crucial to their success.

- ***Officer response:*** Appropriate maintenance provisions are to be secured through planning conditions.

- The Panel emphasises that spaces should be safe and inviting for people of all ages, and at different times of the day.
  - ***Officer response:*** Relevant earlier parts of this report have explained how the final proposal would achieve inclusive and safe facilities and spaces.

Thames Water

736. - Various conditions and informatives are recommended
  - ***Officer response:*** Noted. The recommended conditions and infomatives have been attached to the draft decision notice.

Transport for London (TfL) – Active Travel England

737. - No objection.
  - ***Officer response:*** Noted.

Transport for London (TfL) – London Underground / Docklands Light Railway Infrastructure Protection

738. - No objection.
  - ***Officer response:*** Noted.

Tower Hamlets Council

739. - No objection.
  - ***Officer response:*** Noted.

UKPN

740. - Did not respond to consultation request.

Westminster Council

741. - Did not respond to consultation request.

Community impact and equalities assessment

742. 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.

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

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

745. The Council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application. The positive impacts have been identified throughout this report. They include:

- Accessible accommodation: 10% of the PBCL would be wheelchair accessible and 10% of the conventional homes have been confirmed as meeting Building Regulations Part M,; in addition, all of the ancillary and common spaces within the host buildings would be designed for accessibility across a range of different mental and physical needs in accordance with Part M.
- Employment and training opportunities: There would be some jobs and training opportunities for local unemployed people during the construction stage.
- Improved and more accessible public realm: The proposed public realm, as well as the agreed improvements to footways and highways within the vicinity of the site, would all be designed to assist people with mobility impairments. Physical measures such as level or shallow gradient surfaces and dropped kerbs would benefit disabled and older people in particular.
- Landscape: Outdoor furniture and outdoor lighting has been designed to create comfortable environments in which people of all ages will want to dwell, while planting and play environments would create sensory and tactile spaces particularly supportive of those with certain disabilities. Some of the Pocket Park play provision has been designed specifically for less physically active pursuits (dwelling, socialising etc.) in an effort to

make the environment more appealing and comfortable to teenage girls in particular.

- Transport: Wheelchair parking spaces and cargo bike spaces (the latter being capable of transporting disabled users) would also provided. Funding has been committed for improvements to the bus stop, surfacing treatments, and cyclist facilities on Ilderton Road – all of which will make for a more accessible environment, particularly for the less ambulant such as the elderly or pregnant.
- Public safety: Safer public spaces (through the various proposed active and passive security and surveillance measures) would benefit all groups, but in particular older people, disabled people and women. Cycle stores and entrances would be secure-accessed, well naturally surveilled and lobbied to prevent tail-gaiting, complemented by CCTV surveillance. The PBCL Operational Management Plan details how sex-specific spaces could be provided within the PBCL premises (for example, by floor or by communal room) should there be demand, which has the potential to benefit women in particular.

746. Officers are satisfied that equality implications have been carefully considered throughout the planning process and that Members have sufficient information available to them to have due regard to the equality impacts of the proposal as required by Section 149 of the Equality Act 2010 in determining whether planning permission should be granted.

Human rights implications

747. This planning application engages certain human rights under the Human Rights Act 2008 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.

748. This application has the legitimate aim of redeveloping the site to provide two separate buildings comprising large scale purpose built shared living units, conventional residential dwellings, flexible commercial and community floorspace, children's play space, public realm improvements, landscaping and other associated works. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

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

CONCLUSION

749. This application would bring into productive and optimised re-use this brownfield and underutilised site, providing a complementary mixture of PBCL, conventional housing and flexible commercial uses, with a portion of the latter capable of being tenanted for community use. This would support the role and aspirations of the Old Kent Road Opportunity Area and is in line with the vision for the site, as set out in the adopted site allocation (NSP70) and the draft site allocation (OKR16).

750. There is support in the London Plan and Southwark Plan for PBCL, which helps to release local housing stock and is counted towards the borough's housing delivery. The proposed PBCL accommodation is considered to be exemplary, meeting not only the Mayoral and borough-level policy requirements, but also the quality standards promoted in the Mayor's LPG.

751. This planning application proposes 40% affordable housing by habitable room, all of which would be in social rent tenure. The accommodation would be of a good quality with a range of home sizes offered, all supported by high quality external amenity space and play space. The 186 proposed affordable homes are a significant benefit of the planning application.

752. The design of the proposed development evolved as a result of officer scrutiny throughout the pre-application phase, with further refinement during the planning application stage. The proposed composition of four well-spaced blocks rising from plinths, which diminish in height from north to south, is successful. The proposed mix of red brick and light-coloured masonry-effect finishes, the variety in detailing, the defined 'crowns' and 'bases', and the incorporation of greenery, combine into an exemplary standard of architecture. The façade design is reflective of the buildings' significance as tall buildings in this Opportunity Area location, contributing positively to the local townscape. Through optimised active frontages and the delivery of a new public park at the heart of the site, the development would provide an engaging and animated building at street level. In summary, the proposed development would comply with all aspects of the tall building policy, while also making a public space contribution commensurate with the size of the site.

753. The impacts on neighbours' amenity have been assessed and, while it is recognised that for some properties the daylight and sunlight losses would exceed the BRE guidelines, they are not dissimilar in their extent and magnitude to the impacts caused by the previous/extant planning permission.

754. Transport and highways matters have been satisfactorily addressed by the application documents, with detailed arrangements and mitigation to be secured through planning conditions and obligations. Although the conventional housing and non-residential uses would provide long- and short-stay cycle parking in compliance with the London Plan and Southwark Plan requirements, the PBCL would not deliver the policy minimum. However, it is considered that

the proposed on-site provision of a free-of-charge Cycle Share Scheme, along with Travel Plan commitments, makes for acceptable mitigation in this instance.

755. Through optimised greening at ground, podium and rooftop levels, including the provision of 39 new trees, the scheme would achieve a UGF of 0.40. It would also deliver significant Biodiversity Net Gain, and accordingly monitoring obligations will be secured for a 30-year period.

756. In terms of energy and sustainability, the proposals perform well, achieving cumulative carbon savings of 55% against the Part L 2021 baseline. In addition to this, Whole Life Cycle and Circular Economy considerations have been acceptably addressed. Subject to compliance with the detailed energy and sustainability strategies submitted with the planning application and a payment towards the Carbon Green Fund, the development satisfactorily addresses climate change policies.

757. In line with the requirements of the NPPF, the Council has applied the presumption in favour of sustainable development. The proposal would accord with sustainable principles and would make efficient use of a prominent vacant brownfield site to deliver a high quality development that is in accordance with the Council's aspirations for the area. It is therefore recommended that planning permission is granted, subject to conditions as set out in the attached draft decision notice, referral to the GLA, and the timely completion of a Section 106 Agreement.

BACKGROUND INFORMATION

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: 2327-79 Application file: 24/AP/3687 Southwark Local Development Framework and Development Plan Documents	Environment, Neighbourhoods and Growth Department 160 Tooley Street, London, SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer email: patrick.cronin@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

Appendix 4	Consultation undertaken
Appendix 5	Consultation responses received
Appendix 6	Community Review Panel
Appendix 7	Heads of Terms for Section 106 Agreement

AUDIT TRAIL

Lead Officer	Stephen Platts, Director of Planning and Growth		
Report Author	Patrick Cronin, Team Leader		
Version	Final		
Dated	06 May 2025		
Key Decision	No		
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER			
Officer Title		**Comments Sought**	**Comments included**
Strategic Director, Finance		No	No
Strategic Director, Environment, Neighbourhoods and Growth		No	No
Strategic Director, Housing		No	No
Date final report sent to Constitutional Team			06 May 2025

Appendix 1: Recommendation

Town and Country Planning Act 1990 (as amended)

Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended)

DRAFT DECISION NOTICE

LBS Reg. No.: 24/AP/3687 **Date of Issue of Decision:** N/A

Applicant Tide Construction

Planning permission subject to a legal agreement is PENDING:

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

At: 79-161 Ilderton Road, London, Southwark SE16 3JZ

In accordance with the valid application received on 16 December 2024 and supporting documents submitted which can be viewed on our Planning Register.

For the reasons outlined in the case officer's report, which is also available on the Planning Register.

The Planning Register can be viewed at: https://planning.southwark.gov.uk/online-applications/

Conditions

Permission is subject to the following Approved Plans Condition:

1. The development shall be carried out in accordance with plans and documents submitted with the planning application.

Permission is subject to the following Time Limit and Scope of Works Condition:

2. TIME LIMIT AND SCOPE OF WORKS

Permission is hereby granted for two separate buildings, one of 29 storeys plus additional rooftop plant/access (95.02metres above ground level, 95.97 metres above Ordnance Datum) and the other of 16 storeys plus additional rooftop plant/access (54.88metres above ground level, 55.68 metres above Ordnance Datum), with each building containing a single storey basement and in their totality comprising:

- 865 Large-scale Purpose-built Shared Living units;
- 186 affordable conventional residential dwellings;
- 396 square metres GIA of flexible commercial floorspace (Class E/F use);
- children's playspace and public realm improvements; and
- other associated works incidental to the development.

The development hereby granted shall be begun before the end of three years from the date of this permission.

REASON:

As required by Section 91 of the Town and Country Planning Act 1990 as amended.

Permission is subject to the following Pre-Commencement Conditions:

3. TREE PROTECTION MEASURES

Prior to the commencement of any development hereby consented (including any works of demolition and site clearance), all of the following shall have been and approved in writing by the Local Planning Authority:

a) A pre-commencement meeting shall be undertaken, the details of which shall be notified to the Local Planning Authority for agreement in writing prior to the meeting.

b) A detailed Arboricultural Method Statement shall be submitted to and approved in writing by the Local Planning Authority. The detailed Arboricultural Method Statement shall include:

- the means by which any retained trees on or directly adjacent to the site are to be protected from damage by demolition works, excavation, vehicles, stored or stacked building supplies, waste or other materials, and building plant, scaffolding or other equipment;
- details of facilitative pruning specifications; and
- a supervision schedule overseen by an accredited arboricultural consultant.

c) Cross sections shall be submitted to and approved in writing by the

Local Planning Authority showing surface and other changes to levels, special engineering or construction details and any proposed activity within root protection areas required in order to facilitate demolition, construction and excavation.

The existing trees on or adjoining the site which are to be retained shall be protected and both the site and trees managed in accordance with the recommendations contained in the method statement. Following the pre-commencement meeting all tree protection measures shall be installed, carried out and retained throughout the period of the works, unless otherwise agreed in writing by the Local Planning Authority.

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

In any case, all works must adhere to BS5837: (2012) 'Trees in relation to demolition, design and construction', BS3998: (2010) 'Tree work – recommendations', BS 7370-4:1993 'Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf)', EAS 01:2021 (EN) 'Tree Pruning Standard', EAS 02:2022 (EN) 'Tree Cabling/Bracing Standard', EAS 03:2022 (EN) 'Tree Planting Standard' and NHBC 4.2.13 'Tables for Foundations Near Trees'.

REASON:

To avoid damage to the existing trees which represent an important visual amenity in the area, in accordance with: Chapters 8, 11, 12, 15 and 16 of the National Planning Policy Framework 2024; Policies G1 (Green Infrastructure), G5 (Urban Greening) and G7 (Trees and Woodlands) of the London Plan 2021; and Polices P13 (Design of Places), P56 (Protection of Amenity), P57 (Open Space), P60 (Biodiversity) and P61 (Trees) of the Southwark Plan 2022.

4. SITE CONTAMINATION

a) Prior to the commencement of any development hereby consented (including any works of demolition and site clearance), a detailed 'Remediation and/or Mitigation Strategy' including:

- 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; and
- confirmation that, as a minimum, the site shall 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;

shall be submitted to and approved in writing by the Local Planning Authority.

The approved remediation scheme (if one is required) shall be carried out and implemented as part of the development.

b) Following the completion of the works and measures identified in the approved 'Remediation and/or Mitigation Strategy', a 'Verification Report' providing evidence that all required works have been completed (together with any future monitoring or maintenance requirements), shall be submitted to and approved in writing by the Local Planning Authority.

c) In the event that potential contamination is found at any time when carrying out the approved development that was not previously identified, it shall be reported in writing immediately to the Local Planning Authority, and a 'Remediation and/or Mitigation Strategy' and (if required) a 'Verification Report' shall be submitted to the Local Planning Authority for approval in writing, in accordance with a-c above.

REASON:

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters risk (the site is located above Secondary and Principal Aquifers), 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; and Policies P56 (Protection of Amenity) and P64 (Contaminated Land and Hazardous Substances) of the Southwark Plan 2022.

5. CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

Prior to the commencement of any development hereby consented (including any works of demolition and site clearance), a written Construction Environmental Management Plan (CEMP) shall be 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 including boundary limits and respite periods where exceedance of boundary limits is unavoidable;
- site perimeter continuous automated noise, dust and vibration monitoring and arrangements for provision of access to live data feeds to the Local Planning Authority;
- engineering measures to eliminate or mitigate identified environmental impacts (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);
- a commitment that all NRMM equipment (37 kW and 560 kW) shall be registered on the NRMM register and meets the higher standard as stipulated by the Mayor of London for Opportunity Areas;
- a precautionary method of working for reptiles and mammals including hedgehogs;
- confirmation that the owner of the land adjacent to the eastern site boundary has been notified of the presence of Japanese knotweed and the associated legislative requirements;
- a method statement for the removal and disposal of Invasive species found on-site (as referred to within the Preliminary Ecological Appraisal submitted with the planning application).

To follow current best construction practice, including the following:
- Southwark Council's Technical Guide for Demolition & Construction at http://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 and NRMM London emission standards (http://nrmm.london/)

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

REASON:

To ensure that occupiers of neighbouring premises and the wider environment (including ecology and biodiversity) do not suffer a loss of amenity by reason of pollution and nuisance, in accordance with: the National Planning Policy Framework 2024; Policies GG3 (Creating a Healthy City), D14 (Noise), G1 (Green Infrastructure), G6 (Biodiversity and Access to Nature), G7 (Trees and Woodlands) and T7 (Deliveries, Servicing and Construction) of the London Plan 2021; and Policies P45 (Healthy

Developments), P50 (Highways Impacts), P56 (Protection of Amenity), P59 (Green Infrastructure), P60 (Biodiversity), P62 (Reducing Waste), P65 (improving Air Quality), P66 (Reducing Noise Pollution and Enhancing Soundscapes) of the Southwark Plan 2022.

6. CONSTRUCTION LOGISTICS PLAN

Prior to the commencement of any development hereby consented (including any works of demolition and site clearance), a Construction Logistics Plan developed in liaison with Transport for London to manage all freight vehicle movements to and from the site shall be submitted to and approved by the Local Planning Authority.

The Construction Logistics Plan shall:
- identify all efficiency and sustainability measures that will be taken during the main construction works phase of the development;
- make firm commitments to smart procurement and collaboration (e.g. sharing suppliers) to minimise the number of construction vehicle trips; and
- demonstrate how deliveries to the development through sustainable modes of transport, such as smaller electric vehicles and cargo, will be maximised.

The development shall not be carried out other than in accordance with the approved Construction Logistics Plan or any amendments thereto.

REASON:

To ensure that construction works do not have an adverse impact on the transport network and to minimise the impact of construction activities on local air quality, in accordance with: the National Planning Policy Framework 2024; Policies GG3 (Creating a Healthy City), D14 (Noise), T6 (Assessing and Mitigating Transport Impacts) and T7 (Deliveries, Servicing and Construction) of the London Plan 2021; and Policies P45 (Healthy Developments), P50 (Highways Impacts), P65 (Improving Air Quality) and P66 (Reducing Noise Pollution and Enhancing Soundscapes) of the Southwark Plan 2022.

7. ARCHAEOLOGICAL EVALUATION

Prior to the commencement of any development hereby consented (with the exception of demolition to slab level and site investigation works), a Programme of Archaeological Evaluation Works shall be secured in accordance with a Written Scheme of Investigation, which shall be submitted to and approved in writing by the Local Planning Authority.

REASON:

In order that the necessary archaeological information is supplied, in the interests of ensuring suitable mitigation measures and/or foundation design proposals are presented, in accordance with: the National Planning Policy Framework 2024; and Policy P23 (Archaeology) of the Southwark Plan 2022.

8. ARCHAEOLOGICAL FOUNDATION AND BASEMENT DESIGN

Prior to the commencement of any development hereby consented (with the exception of demolition to slab level, archaeological evaluation and site investigation works), a detailed scheme showing the complete scope and arrangement of the basement and foundation design, and all associated subterranean groundworks, including the construction methods, shall be submitted to and approved in writing by the Local Planning Authority. The submitted document(s) shall demonstrate that archaeological remains will be protected by a suitable mitigation strategy. The development shall only be carried out in accordance with the approval given.

REASON:

In order that details of the basement, foundations and all below ground impacts of the proposed development are known and an appropriate protection and mitigation strategy is achieved to preserve archaeological remains by record and/or in situ, in accordance with: the National Planning Policy Framework 2024; and Policy P23 (Archaeology) of the Southwark Plan 2022.

9. ARCHAEOLOGICAL MITIGATION

Prior to the commencement of any development hereby consented (with the exception of demolition to slab level, archaeological evaluation and site investigation works), the implementation of a Programme of Archaeological Mitigation Works shall be secured in accordance with a Written Scheme of Investigation, which shall be submitted to and approved in writing by the Local Planning Authority.

REASON:

In order that the details of the programme of works for the archaeological mitigation are suitable with regard to the impacts of the proposed development and the nature and extent of archaeological remains on site, in accordance with: the National Planning Policy Framework 2024; and Policy P23 (Archaeology) of the Southwark Plan 2022.

10. DIGITAL CONNECTIVITY INFRASTRUCTURE STRATEGY

No later than three months following the commencement of any development hereby consented (with the exception of demolition to slab level, archaeological evaluation, site investigation works and site clearance), detailed plans shall be submitted to and approved in writing by the Local Planning Authority demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development, unless an alternative 1GB capable connection is made available to all end users. The development shall be carried out in accordance with the approved plans and maintained as such in perpetuity.

REASON:

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

11. PROTECTION OF THE EXISTING STRATEGIC WATER MAINS

Prior to commencement of the development hereby consented (with the exception of demolition to slab level, archaeological evaluation, site investigation works and site clearance), details shall be submitted to and approved in writing by the Local Planning Authority (in consultation with Thames Water) setting out either:

- the diversion of the existing strategic water mains asset; or
- the alignment of the development with the existing strategic water mains asset;

and any construction must be undertaken in accordance with the terms of the approved information.

Unrestricted access must be available at all times for the maintenance and repair of the strategic water mains asset during the construction works and thereafter for the lifetime of the development.

REASON:

The location of the consented development within 5 metres of an underground strategic water mains means it has the potential to impact on local underground water utility infrastructure, and as such the protection of this subsurface potable water infrastructure (either by a diversion of it, or by an alignment of the consented development) is necessary to avoid any damage as its ongoing availability for maintenance and repair, in accordance with: with: the National Planning Policy Framework 2024; and Policy SI5 (Water Infrastructure) of the London Plan 2021.

12. PILING METHOD STATEMENT AND LAYOUT PLAN

No piling shall take place other than with the Local Planning Authority's written approval of a Piling Method Statement and Layout Plan, in consultation with Thames Water.

The Piling Method Statement and Layout Plan shall include:

- details of the depth and type of piling to be undertaken and the methodology by which such piling will be carried out;
- measures to prevent and minimise the potential for damage to subsurface water infrastructure;
- the programme for the works;
- a piling layout plan that depicts all Thames Water clean water assets, all local topography and the clearance between the face of the pile and the face of any pipes.

Any piling shall be undertaken in accordance with the terms of the approved

Piling Method Statement.

REASON:

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

Permission is subject to the following Above Grade Works Conditions:

13. CONSTRUCTION MANAGEMENT STRATEGY (AVIATION)

Before any above grade work hereby authorised begins (with the exception of demolition and site clearance), a Construction Management Strategy (Aviation) shall be submitted to and approved in writing by the Local Planning Authority. The Strategy shall include the following matters:

- details of cranes and other tall construction equipment such as piling rigs, including the details of obstacle lighting (Such schemes shall comply with CAST Advice Note 4 'Cranes and Other Construction Issues' and CAA CAP1096 'Guidance to crane users on aviation and notification (caa.co.uk)'; For cranes submission use the CAA portal, Crane notification, Civil Aviation Authority).
- control of activities likely to produce dust and smoke etc.

The approved Construction Management Strategy (Aviation), or any variation approved in writing by the Local Planning Authority, shall be implemented for the duration of the construction period.

REASON:

To ensure that construction work and construction equipment on the site and adjoining land does not create an unacceptable penetration of the Obstacle Limitation Surface (OLS) and the Instrument Flight Procedures (IFP's) surrounding London City Airport and endanger aircraft performance and the safe operation of the aerodrome, in accordance with: the National Planning Policy Framework 2024; and Policy T8 (Aviation) of the London Plan 2021.

14. FINAL SURFACE WATER DRAINAGE STRATEGY AND VERIFICATION REPORT

(a) Before any above grade work hereby authorised begins (with the exception of demolition and site clearance), full details of the proposed Final Surface Water Drainage Strategy incorporating SuDS shall be submitted to and approved in writing by the Local Planning Authority. The Strategy shall:

- include detailed design, size and location of attenuation units and details of flow control measures
- achieve a reduction in surface water runoff rates during the 1% Annual Exceedance Probability event plus climate change allowance, as detailed in

the approved Sustainable Drainage Report (ref 232-BMC-XX-XX-RP-C-0001 - Dated December 2024 - Produced by Barrett Mahony);
- demonstrate that the site is safe in the event of blockage/failure of the system, including consideration of exceedance flows;
- state who will own the bespoke maintenance tasks for the proposed SuDS features.

(b) Before the first occupation of any part of the development hereby consented, a Final Surface Water Drainage Verification Report prepared by a suitably qualified engineer shall be submitted to and approved in writing by the Local Planning Authority for each building. The Verification Report shall:
- provide evidence that the drainage system (incorporating SuDS) has been constructed according to the approved details and specifications (or detail any minor variations where relevant) as detailed in the approved Sustainable Drainage Report (ref 232-BMC-XX-XX-RP-C-0001 - Dated December 2024 - Produced by Barrett Mahony);
- 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; and
- include details of the responsible management company.

REASON:

To ensure the surface water drainage complies with the approved Final Surface Water Drainage Strategy, in the interests of reducing the potential for the site to contribute to surface water flooding, in accordance with in accordance with: the National Planning Policy Framework 2024; Policy SI 13 (Sustainable Drainage) of the London Plan 2021; Policy P68 (Reducing Flood Risk) of the Southwark Plan 2022; and Southwark's Strategic Flood Risk Assessment 2017.

15. INVERTEBRATE HABITATS

a) Before any above grade work hereby consented begins (with the exception of demolition and site clearance), details of no fewer than 6 bee bricks and/or invertebrate hotels shall be submitted to and approved in writing by the Local Planning Authority. The details shall include the exact location, specification and design of the habitats.

Prior to the first occupation of the building to which they form part, the habitat features shall be installed strictly in accordance with the approved details. Once completed and for the lifetime of the development, all the habitats shall be maintained in accordance with the approved details.

b) No later than six weeks subsequent to first occupation of the building to which the habitat features form part or the first use of the space in which they are contained, a post completion assessment (details/evidence of the installed habitat features and mapped locations) shall be submitted to the Local Planning Authority, and this condition shall not have been discharged until written approval has been given by the Local Planning Authority.

The approved habitat features shall from first installation and for the lifetime

of the development be maintained in accordance with the approved details.

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; and Policies P59 (Green Infrastructure) and P60 (Biodiversity) of the Southwark Plan 2022.

16. BAT ROOSTING FEATURES

a) Before any above grade work hereby consented begins (with the exception of demolition and site clearance), details of no fewer than six bat bricks/tubes shall be submitted to and approved in writing by the Local Planning Authority. The details shall include the exact location, specification and design of the habitats.

Prior to the first occupation of the building to which they form part, the bricks/tubes shall be installed strictly in accordance with the approved details. Once completed and for the lifetime of the development, all the bricks/tubes shall be maintained in accordance with the approved details.

b) No later than six weeks subsequent to the installation of the bricks/tubes approved under part a) of this condition, a post completion assessment shall be submitted to the Local Planning Authority confirming the bricks/tubes have been installed to the agreed specification, and this condition shall not have been discharged until written approval has been given by the Local Planning Authority.

REASON:

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

17. BIRD NESTING FEATURES

a) Before any above grade work hereby consented begins (with the exception of demolition and site clearance), details of no fewer than six Swift nesting bricks shall be submitted to and approved in writing by the Local Planning Authority. The details shall include the exact location, specification and design of the bricks.

Prior to the first occupation of the building to which they form part, the bricks shall be installed strictly in accordance with the approved details. Once completed and for the lifetime of the development, all the bricks shall be maintained in accordance with the approved

details.

b) No later than six weeks subsequent to the installation of the nesting bricks approved under part a) of this condition, a post completion assessment shall be submitted to the Local Planning Authority confirming the nesting bricks have been installed to the agreed specification, and this condition shall not have been discharged until written approval has been given by the Local Planning Authority.

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.

18. SECTION DETAIL-DRAWINGS

Before any above grade work hereby consented begins (with the exception of demolition and site clearance), section detail-drawings at a scale of 1:5 together with 1:50 scale context drawings through:

i. Facades (reveals etc.) including:
- The various brick treatments;
- Canopies/awnings;
- Junctions of exposed structural elements (columns, beams and floors);
- Head, cills and jambs of openings;
- Parapets and roof edges;
- Rooftop balustrades;

ii. Entrances (including any access sashes, security gates, entrance portals and awnings);

iii. Typical windows;

iv. Plant screening/ enclosure;

v. Shopfront of the commercial units and the Large-scale Purpose-built Shared Living foyer;

vi. Signage zones; and

vii. Gates and fencing to all external spaces (including the fence and gates to the Pocket Park, the height of which shall be no greater than 1.6 metres above ground level, and the design of which shall achieve a maximum porosity of 50%);

of the proposal to be constructed in the carrying out of this permission, shall be submitted to and approved in writing by the Local Planning Authority.

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

REASON:

In order to satisfy the Local Planning Authority that the construction details will achieve a high quality of design and detailing, are suitable in context and are consistent with the consented scheme, in accordance with: the National

Planning Policy Framework 2024; Policy D4 (Delivering Good Design) of the London Plan 2021; and Policies P13 (Design of Places) and P14 (Design Quality) of the Southwark Plan 2022.

19. MATERIALS SCHEDULE AND ON-SITE PRESENTATION OF MOCK-UP PANELS

Before any above grade work hereby consented begins (with the exception of demolition and site clearance):

a) the specification of each facing materials to be used in the development hereby approved shall be submitted as part of a Material Schedule to, and thereafter approved in writing by, the Local Planning Authority; and

b) full-scale mock-ups of the facades shall be presented on site (or near to the site) and approved in writing by the Local Planning Authority (the detailed scope of mock up requirements to have been agreed with the Local Planning Authority in advance of them being constructed and presented on site).

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

REASON:

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

20. SECURED BY DESIGN

a) Before any above grade work hereby consented begins (with the exception of demolition and site clearance), details of security measures (specified to achieve the `Secured by Design' accreditation award from the Metropolitan Police) shall be submitted to and approved in writing by the Local Planning Authority, and any such security measures shall be implemented prior to occupation in accordance with the approved details.

b) Within three months of the occupation of the development hereby approved, confirmation that Secure by Design certification has been achieved shall be submitted to and approved in writing by the Local Planning Authority.

REASON:

In pursuance of the Local Planning Authority's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions and to improve community safety and crime

prevention, in accordance with: the National Planning Policy Framework 2024; Policy D11 (Safety, Security and Resilience to Emergency) of the London Plan 2021; and Policy P16 (Designing Out Crime) of the Southwark Plan 2022.

21. RESISTANCE WITHIN RESIDENTIAL UNITS TO ENVIRONMENTAL NOISE

a) Before any above grade work hereby authorised begins (with the exception of demolition and site clearance), an Acoustic Predictions and Mitigation Measures Report shall be submitted to and approved in writing by the Local Planning Authority. This report shall demonstrate that the residential dwellings (Purpose-Built Shared Living units and conventional Class C3 homes) hereby permitted have been 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 rooms: 35dB LAeq T #
- Dining room: 35 dB LAeq T #

[* refers to night time - 8 hours between 23:00-07:00 (LAFmax T not more than 10 times per night); # refers to day time - 16 hours between 07:00-23:00]
When assessing mitigation measures to ensure the above standards are met, the tenth highest individual LAMax event measured shall be used not a time-averaged LAMax.

b) The development shall be carried out in accordance with the approved Acoustic Predictions and Mitigation Measures Report.

c) Following the completion of the development hereby consented but before the first occupation of any part of it, a validation test shall be carried out on a relevant sample of premises. An 'Internal Noise Levels Validation Report' containing the results of the validation test shall be submitted to the Local Planning Authority for approval in writing. The approved scheme shall be implemented and permanently maintained thereafter.

REASON:

To ensure that the occupiers and users of the development do not suffer a loss of amenity by reason of excess noise from environmental and transportation sources, in accordance with: the National Planning Policy Framework 2024; Policy D14 (Noise) of the London Plan 2022; and Policies P56 (Protection of Amenity) and P66 (Reducing Noise Pollution and Enhancing Soundscapes) of the Southwark Plan 2022.

Permission is subject to the following Pre-Occupation Conditions:

22. FINAL EXTERNAL LIGHTING STRATEGY

Before the first occupation of any part of the development hereby consented, a Final External Lighting Strategy shall be submitted to and approved in

writing by the Local Planning Authority. The Strategy shall:

(i) identify those areas/features that are particularly sensitive for bats and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory (for example, for foraging);

(ii) show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places;

(iii) include details of design, power and position of luminaries, and any dim-down and turn-off times;

(iv) demonstrate compliance with (or otherwise explain why compliance cannot be achieved with) the details/recommendations given at 5.1 through to 5.3.15 of the Preliminary Ecological Appraisal submitted with the planning application; and

(v) demonstrate compliance with the Institute of Lighting Professionals Guidance Note 01/20 'Guidance notes for the reduction of obtrusive light'.

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 shall any other external lighting be installed without prior consent from the local planning authority.

REASON:

To ensure compliance with the Habitats Regulations and the Wildlife & Countryside Act 1981 (as amended), because bats are known to be active in the vicinity of the development site, and in order that the Local Planning Authority may be satisfied as to the details of the development (in the interest of the visual amenity of the area, the safety and security of persons using the area and the amenity and privacy of adjoining occupiers), in accordance with: the National Planning Policy Framework 2024; Policies D3 (Optimising Site Capacity Through the Design-led Approach), D4 (Delivering Good Design), D8 (Public Realm), D9 (Tall Buildings), D14 (Designing Out Crime), D11 (Safety, Security and Resilience to Emergency), G1 (Green Infrastructure) and G6 (Biodiversity and Access to Nature) of the London Plan 2021; and Policies P13 (Design of Places), P16 (Designing Out Crime), P56 (Protection of Amenity), P59 (Green Infrastructure) and P60 (Biodiversity) of the Southwark Plan 2022.

23. FINAL SECURITY SURVEILLANCE EQUIPMENT STRATEGY

Before the first occupation of any part of the development hereby consented, a Final Security Surveillance Equipment Strategy shall be submitted to and approved in writing by the Local Planning Authority. The Strategy shall provide details of the security surveillance equipment to be installed on the building and within all external areas at all levels of the building.

REASON:

In order that the Local Planning Authority may be satisfied as to the details of the development in the interest of the visual amenity of the area, the safety and security of persons using the area and the amenity and privacy of adjoining occupiers in accordance with: the National Planning Policy Framework 2024; Policies D3 (Optimising Site Capacity Through the Design-led Approach), D4 (Delivering Good Design), D8 (Public Realm), D9 (Tall Buildings), D14 (Designing Out Crime) and D11 (Safety, Security and Resilience to Emergency) of the London Plan 2021; and Policies P13 (Design of Places), P56 (Protection of Amenity) and P16 (Designing Out Crime) of the Southwark Plan 2022.

24. LANDSCAPE AND ECOLOGICAL MANAGEMENT PLAN

Before the first occupation of any part of the development hereby consented, a Landscape and Ecological Management Plan shall be submitted to and approved by the Local Planning Authority, which shall provide full details of:

- long term design objectives to meet BNG requirements;
- management responsibilities and maintenance schedules for all landscape areas (other than small, privately owned, domestic gardens) including planting areas, rain gardens and green roofs; and
- an irrigation schedule for all trees to ensure successful establishment.

For stem girths of up to 20cm the schedule shall be a minimum of three years, and for stem girths greater than 20cm the schedule shall be five years.

The Landscape and Ecological 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, 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’ and EAS 03:2022 (EN) ‘Tree Planting Standard’.

REASON:

To ensure the details of the landscaping and ecological management scheme are satisfactory, in accordance with: Chapters 8, 11, 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; Policies P13 (Design of Places), P14 (Design Quality), P56 (Protection of Amenity), P57 (Open Space), P60 (Biodiversity) and P61 (Trees) of the Southwark Plan 2022.

25. ELECTRIC VEHICLE CHARGING POINTS

Before the first occupation of any part of the development hereby consented, details of the installation (including location and type) of the three electric vehicle charger points to serve the wheelchair parking spaces shall be submitted to and approved in writing by the Local Planning Authority.

The approved electric vehicle charger point shall be installed prior to occupation of any part of the development, and shall not be carried out other than in accordance with the approval given.

REASON:

To encourage more sustainable travel and minimise the effect of the development on local air quality within the designated Air Quality Management Area, as well as to encourage the uptake of electric and hybrid vehicles, in accordance with: the National Planning Policy Framework 2024; Policy T6 (Car Parking) of the London Plan 2021; and Policies P54 (Car Parking) and P70 (Energy) of the Southwark Plan 2022.

26. BREEAM CERTIFICATION

a) Before the first occupation of any part of the development hereby consented, an interim report/letter (together with any supporting evidence) from the licensed BREEAM assessor shall be submitted to and approved in writing by the Local Planning Authority. The report/letter shall confirm that sufficient progress has been made in terms of detailed design, procurement and construction to be reasonably well assured that the commercial elements of the development hereby approved will, once completed, achieve the agreed 'Excellent' BREEAM Standards.

b) Within nine months of first occupation of the development hereby permitted, a certified Post Construction Review (or other verification process agreed with the Local Planning Authority) shall be submitted to and approved in writing by the Local Planning Authority, confirming that the agreed 'Excellent' BREEAM standards have been met.

REASON:

To ensure the proposal achieves high environmental standards and plays its role in reducing the extent of man-made climate change, in accordance with: the National Planning Policy Framework 2024; Policy SI2 (Minimising Greenhouse Gas Emissions) of the London Plan 2021; and Policies SP6 (Climate Emergency) and P69 (Sustainability Standards) of the Southwark Plan 2022.

27. FLOOD WARNING AND EVACUATION PLAN

Before the first occupation of any part of the development hereby consented, a Flood Warning and Evacuation Plan shall be submitted to and approved in writing by the Local Planning Authority. The Flood Warning and Evacuation Plan shall:

- state how occupants will be made aware that they can sign up to the Environment Agency Flood Warning services;
- state how occupants will be made aware of the plan itself;
- provide details of how occupants should respond in the event that they receive a flood warning, or become aware of a flood;
- state the measures that will be implemented to provide appropriate refuge, as well as safe and efficient evacuation for occupiers, in a flood event; and
- provide details of any flood mitigation and resilience measures designed into the scheme post-permission additional to those secured at planning application approval stage.

The approved Flood Warning and Evacuation Plan shall be implemented on first occupation of the ground floor premises hereby approved and carried out in accordance with the approved details for the lifetime of the development.

REASON:

To ensure that a strategy is in place that will reduce the risk to occupiers in the event of a flood, given that part of the site is at risk of surface water flooring, in accordance with: the National Planning Policy Framework 2024; Policy SI12 (Flood Risk Management) of the London Plan 2021; P68 (Reducing Flood Risk) of the Southwark Plan 2022; and Southwark's Strategic Flood Risk Assessment 2017.

28. OFF-SITE WASTE WATER INFRASTRUCTURE NETWORK CAPACITY UPGRADES

Before the first occupation of any part of the development hereby consented, one of the following shall be submitted to and approved in writing by the Local Planning Authority (in liaison with Thames Water):

a) all water network upgrades required to accommodate the additional flows to serve the development have been completed; or

b) a Development and Infrastructure Phasing Plan has been agreed with Thames Water to enable the development to be occupied.

Where a Development and Infrastructure Phasing Plan is agreed, occupation of the development shall not take place other than in accordance with the agreed Development and Infrastructure Phasing Plan.

REASON:

Network reinforcement works may be required to accommodate the proposed development, necessary in order to avoid sewage flooding and/or potential pollution incidents, in accordance with: the National Planning Policy Framework 2024; Policy SI5 (Water Infrastructure) of the London Plan 2021;

and Policy P67 (Reducing Water Use) of the Southwark Plan 2022.

29. SIGNAGE STRATEGY

Before the first occupation of any of the commercial units hereby consented, a Signage Strategy detailing the design code(s) for the proposed frontages of the flexible commercial units shall be submitted to and approved in writing by the Local Planning Authority. Thereafter, all installed signage (including any new/replacement signage) shall be implemented in accordance with the approved Signage Strategy.

The design code(s) shall include details of:
- dimensions and locations of the advertisement zones;
- materials;
- awnings;
- mode and level of any illumination; and
- any ways in which the proposed signage designs differ from those in the planning application stage drawings.

REASON:

To ensure that high quality, consistent and coordinated signage is installed across all non-residential frontages within the development hereby approved, in accordance with: the National Planning Policy Framework 2024; Policies D4 (Delivering Good Design), D8 (Public Realm) and D9 (Tall Buildings of the London Plan 2021; and Policies P14 (Design Quality) and P43 (Outdoor Advertisements and Signage) of the Southwark Plan 2022.

30. EXTRACTION AND VENTILATION SCHEME FOR COMMERCIAL KITCHEN (CLASS E) USES

Before any of the commercial units hereby consented are used for purposes involving the cooking of food, full particulars and details of a scheme for the extraction and ventilation of any commercial kitchen use shall be submitted to and approved in writing by the Local Planning Authority, demonstrating that that fumes and odours from the kitchen would not affect public health or residential amenity. The scheme shall include:
- details of extraction rate and efflux velocity of extracted air;
- full details of grease, particle and odour abatement plant;
- the location and orientation of the extraction ductwork and discharge terminal; and
- a Management and Servicing Plan for maintenance of the extraction system.

Once approved, the scheme shall be implemented in full. Permanently thereafter, all components of the extraction system shall be cleaned, serviced, maintained and replaced at sufficient intervals to prevent degradation in performance of the system’s components affecting surrounding amenity, and fully in accordance with manufacturer’s recommendations. Suitable documentary evidence shall be kept and made available to the Local Planning Authority upon request.

REASON:

In order to ensure that that any installed ventilation, ducting and/or ancillary equipment will not cause amenity impacts (through odour, fume or noise nuisance) and will not detract from the appearance of the building in accordance with: the National Planning Policy Framework 2024; Policies D4 (Delivering Good Design), D13 (Agent of Change) and SI 1 (Improving Air Quality) of the London Plan 2021; and Policies P13 (Design of Places), P14 (Design Quality), P56 (Protection of Amenity) and P65 (Improving Air Quality) of the Southwark Plan 2022.

31. RESISTANCE TO SOUND TRANSFER FROM GYM HEALTH AND FITNESS USE

a) The noise control scheme (including sound insulation and isolation measures) implemented in order to minimise as far as practicable both airborne noise and structure-borne noise from the use of the health and fitness studios/gym, shall ensure that the airborne and impact noise target levels detailed in Table 1 below are achieved when tested in accordance with Method 2 (ANC ProPG: Gym Acoustics Guidance (GAG) March 2023).

Table 1:
- Target Levels Airborne noise health and fitness activity noise shall be no greater than curve G15 as an Leq,5minutes, in accordance with ProPG:GAG2023 methodology in any structurally adjoining habitable areas of residential properties located above or adjoining the health and fitness studio or Gym.
- Impact noise (airborne & structure-borne) health and fitness activity noise shall be no greater than G20 LMax, in accordance with ProPG:GAG2023 methodology in any structurally adjoining habitable areas of residential properties located above or adjoining the health and fitness studio or Gym.

b) Following the completion of the development hereby consented but before the first occupation of any part of it, validation testing shall be completed to assess that the noise scheme of works has been successfully implemented to the design expectations. A ‘Noise Control Scheme Compliance Report’ shall be submitted to and approved in writing by the Local Planning Authority. Once approved the scheme of noise control shall be permanently maintained thereafter

Reason:
To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of noise nuisance and other excess noise from activities within the fitness studios/gyms/pool, in accordance with: the National Planning Policy Framework 2024; and Policies P56 (Protection of amenity) and Policy P66 (Reducing Noise Pollution and Enhancing Soundscapes) of the Southwark Plan 2022.

Permission is subject to the following Compliance Conditions:

32. RESISTANCE TO HORIZONTAL SOUND TRANSMISSION BETWEEN RESIDENTIAL UNITS

The habitable rooms within the development (Purpose-Built Shared Living Units and conventional Class C3 dwellings) sharing a party wall element with any other residential or commercial premises shall be designed and constructed to provide reasonable resistance to the transmission of sound sufficient to ensure that the party wall meets a minimum of 5dB improvement on the Building Regulations standard set out in Approved Document E.

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 adjacent premises in accordance with: the National Planning Policy Framework 2024; Policy D14 (Noise) of the London Plan 2022; and Policies P56 (Protection of Amenity) and P66 (Reducing Noise Pollution and Enhancing Soundscapes) of the Southwark Plan 2022.

33. RESISTANCE TO SOUND TRANSMISSION BETWEEN COMMERCIAL AND RESIDENTIAL PROPERTIES

Party walls, floors and ceilings between the commercial premises and residential dwellings (Purpose-Built Shared Living units and conventional Class C3 homes) shall be designed to achieve a minimum weighted standardized level difference of 55dB DnTw+Ctr. The partition's acoustic performance shall be permanently maintained thereafter.

REASON:

To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of noise nuisance and other excess noise from activities within the commercial premises, in accordance with: the National Planning Policy Framework 2024; and Policies P56 (Protection of Amenity) and Policy P66 (Reducing Noise Pollution and Enhancing Soundscapes) of the Southwark Plan 2022.

34. RESISTANCE TO INTER-PREMISES (COMMERCIAL-TO-RESIDENTIAL) NOISE TRANSFER

The habitable rooms within the development (Purpose-Built Shared Living units and conventional Class C3 homes) sharing a party ceiling or floor element with commercial premises shall be designed and constructed to provide reasonable resistance to the transmission of sound sufficient to ensure that noise due to the commercial premises does not exceed NR20 when measured as an LAeq across any 5 minute period.

REASON:

To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of noise nuisance and other excess noise from activities within the commercial premises, in accordance with: the

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

35. PLANT NOISE RESTRICTION

a) The Rated sound level from any plant, together with any associated ducting shall not exceed the Background sound level (LA90 15min) at the nearest noise sensitive premises. Furthermore, the plant Specific sound level shall be 10dB(A) or more below the background sound level in this location. For the purposes of this condition the Background, Rating and Specific sound levels shall be calculated in full accordance with the methodology of 'BS4142:2014 +A1:2019'. Suitable acoustic treatments shall be used to ensure compliance with the above standard.

b) A validation test shall be carried out and the results submitted to the Local Planning Authority for approval in writing to demonstrate compliance with the above standard. Once approved the plant and any acoustic treatments shall be permanently maintained thereafter.

REASON:

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance, and that the local environment does not suffer from noise creep due to plant and machinery, in accordance with: the National Planning Policy Framework 2024; Policy D14 (Noise) of the London Plan 2022; and Policies P56 (Protection of Amenity) and P66 (Reducing Noise Pollution and Enhancing Soundscapes) of the Southwark Plan 2022.

36. CYCLE STORAGE COMPLIANCE

The development hereby approved shall not be carried out other than in accordance with the cycle parking facilities (spaces, stand types, layout and access arrangements) shown on the following approved documents:
- 'Proposed Block A&B Basement Plan' - 232-TPB-AB-B1-DR-A-114-0199-P02 - Rev P02 - Dated 04.04.2025
- 'Proposed Block A&B Ground Floor Plan' - 232-TPB-AB-GF-DR-A-114-0100-P02 - Rev P02 - Dated 04.04.2025
- 'Proposed Block C&D Basement Plan' - 232-TPB-CD-B1-DR-A-114-0199-P02 - Rev P02 - Dated 04.04.2025
- 'Proposed Block C&D Ground Floor Plan' - 232-TPB-CD-GF-DR-A-114-0100-P02 - Rev P02 - Dated 04.04.2025

REASON:

To ensure that satisfactory safe and secure cycle parking facilities are provided and retained in order to encourage the use of cycling as an alternative means of transport to the development and to reduce reliance on the use of the private car in accordance with: the National Planning Policy Framework 2024; Policy T5 (Cycling) of the London Plan 2021; and P53 (Cycling) of the Southwark Plan 2022.

37. REFUSE STORAGE COMPLIANCE

The development hereby approved shall not be carried out other than in accordance with the refuse storage facilities (store rooms, layout and access arrangements) shown on the following approved documents:
- 'Proposed Block A&B Basement Plan' - 232-TPB-AB-B1-DR-A-114-0199-P02 - Rev P02 - Dated 04.04.2025
- 'Proposed Block A&B Ground Floor Plan' - 232-TPB-AB-GF-DR-A-114-0100-P02 - Rev P02 - Dated 04.04.2025
- 'Proposed Block C&D Ground Floor Plan' - 232-TPB-CD-GF-DR-A-114-0100-P02 - Rev P02 - Dated 04.04.2025

REASON:

To ensure that satisfactory safe and secure cycle parking facilities are provided and retained in order to encourage the use of cycling as an alternative means of transport to the development and to reduce reliance on the use of the private car in accordance with: the National Planning Policy Framework 2024; Policy T5 (Cycling) of the London Plan 2021; and P53 (Cycling) of the Southwark Plan 2022.

38. HOURS OF USE

The units hereby permitted for Class F2 and/or Class E use shall not be carried on outside of the following hours:
- 07:00 to 23:00 on any day.

REASON:

To safeguard the amenity of neighbouring residential properties, in accordance with: the National Planning Policy Framework 2024; Policy P56 (Protection of Amenity) and Policy P66 (Reducing Noise Pollution and Enhancing Soundscapes) the Southwark Plan 2022.

39. SERVICING HOURS

Notwithstanding the details contained in any delivery and servicing plans or documents approved as part of any condition attached to this decision notice, all deliveries or collections to the development hereby approved shall only be between the following hours:
- 06:30 to 22:00 Monday to Saturday; and
- 10:00 to 18:00 on Sundays and Bank Holidays.

REASON:

To ensure that the occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance, and to reduce vehicle movements on the local road network during peak times, in accordance with: the National Planning Policy Framework 2024; Policy T7 (Deliveries, Servicing and Construction) of the London Plan 2021; and Policy P50 (Highways Impacts) of the Southwark Plan 2022.

40. RESTRICTION: NO INSTATEMENT OF APPURTENANCES

No meter boxes, flues, vents or pipes (other than rainwater pipes) or other appurtenances not shown on the approved drawings shall be fixed or installed on the elevations of the buildings, unless otherwise approved by the Local Planning Authority.

REASON:

To ensure such works do not detract from the appearance of the buildings in accordance with: the National Planning Policy Framework 2024; Policy D4 (Delivering Good Design) of the London Plan 2023; and Policies P13 (Design of Places), P14 (Design Quality) and P56 (Protection of Amenity) of the Southwark Plan 2022.

41. RESTRICTION: NO INSTATEMENT OF ROOF PLANT AND OTHER ROOF STRUCTURES

No roof plant, equipment or other structures, other than as shown on the drawings hereby approved or discharged under an 'approval of details' application pursuant to this permission, shall be placed on the roof or be permitted to project above the roofline of any part of the building as shown on elevational drawings or shall be permitted to extend outside of the roof plant enclosure hereby permitted.

REASON:

To ensure no additional plant is placed on the roof of the building in the interest of the appearance and design of the building and the visual amenity of the area, in accordance with: the National Planning Policy Framework 2024; Policy D4 (Delivering Good Design) of the London Plan 2021; and Policies P13 (Design of Places), P14 (Design Quality) and P56 (Protection of Amenity) of the Southwark Plan 2022.

42. RESTRICTION: NO INSTATEMENT OF TELECOMMUNICATIONS EQUIPMENT

Notwithstanding the provisions of Schedule 2, Part 16 of the Town & Country Planning (General Permitted Development) (England) Order 2015 [as amended or re-enacted] no external telecommunications equipment or structures shall be placed on the roof or any other part of a building hereby permitted, unless otherwise approved by the Local Planning Authority.

REASON:

To ensure no telecommunications plant or equipment which might be detrimental to the design and appearance of the building and visual amenity of the area is installed on the roof of the building in accordance with: the National Planning Policy Framework 2024; Policy D4 (Delivering Good Design) of the London Plan 2021; and Policies P13 (Design of Places), P14 (Design Quality) and P56 (Protection of Amenity) of the Southwark Plan

2022.

43. RESTRICTION: NO UNAUTHORISED PENETRATIVE GROUNDWORKS (BOREHOLES, PILING OR OTHER FOUNDATION DESIGNS)

Other than the piling specifically proposed and hereby approved, any 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. Any such express written consent shall be given only for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater.

Where soil contamination is present, any such application for piled or penetrative foundation designs shall be accompanied by a risk assessment carried out in accordance with the Environment Agency's guidance 'Piling into Contaminated Sites'. Piling activities will not be permitted on parts of a site where an unacceptable risk is posed to Controlled Waters.

The development shall thereafter be carried out in accordance with the approved details.

REASON:

Due to the underlying groundwater risks attendant with piling or other penetrative methods of foundation design, and in order to protect receptors (workers, neighbours, other off-site receptors and future users of the development) from potential risks arising from any such foundation works in particular unacceptable levels of water pollution caused by mobilised contaminants, in accordance with: the National Planning Policy Framework 2024; Policy G9 (Geodiversity) of the London Plan 2021; and Policies P56 (Protection of Amenity) and P64 (Contaminated Land and Hazardous Substances) of the Southwark Plan 2022.

44. BASEMENT IMPACT ASSESSMENT COMPLIANCE

The development hereby approved shall be carried out in accordance with the recommendations contained within the Basement Impact Assessment, which comprises the following document(s):
- 'Basement Impact Assessment Report' - Ref 232-BMC-XX-XX-RP-S-141-0002 - Rev P02 - Dated 10.12.2024 - Produced by Barrett Mahony and Asquared Studio Engineers

REASON:

To ensure the basement is designed safely in reference to ground movement, flood risk, sustainable urban drainage and archaeology, in accordance with: the National Planning Policy Framework 2024; Policy D10 (Basement Development) of the London Plan 2021; Policies P14 (Design Quality), P23 (Archaeology) and P68 (Reducing Flood Risk).

45. FIRE SAFETY STRATEGY COMPLIANCE

The development hereby approved shall not be carried out other than in accordance with the approved Fire Safety Strategy, which comprises the following documents:
- 'Fire Statement' - Ref JL9798/R1 - Issue 3 - Dated 12.12.2024 - Produced by Jensen Hughes;
- 'Fire statement form' [Gateway One form] - Dated 12.12.2024 - Produced by Jensen Hughes.

REASON:

To minimise the risk to life and minimise building damage in the event of a fire, in accordance with: the National Planning Policy Framework 2024; and Policies D11 (Safety, Security and Resilience to Emergency) and D12 (Fire Safety) of the London Plan 2021.

46. FINAL GROUND PLANE SPOT LEVELS PLAN COMPLIANCE

The development hereby approved shall not be carried out other than in accordance with the approved Ground Plane Spot Levels plan, which comprises the following document:
- 'Ilderton Road Landscape Levels Plan' - 232-CTF-XX-XX-DR-L-10010 - Rev P02 - Dated 18.02.2025

REASON:

To ensure the delivery of a high quality and accessible public realm that relates to the internal ground floor environment and adjacent highway/footway network in a safe and rational way, in accordance with: the National Planning Policy Framework 2024; Policies Policy D4 (Delivering Good Design) and D5 (Inclusive Design), D8 (Public Realm) and T2 (Healthy Streets) of the London Plan 2021; and Policies P13 (Design of Places), P14 (Design Quality), P50 (Highways impacts), P51 (Walking), P53 (Cycling) of the Southwark Plan 2022.

Permission is subject to the following Special Conditions:

47. HARD AND SOFT LANDSCAPING

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

a) a scaled plan showing all existing vegetation and landscape features to be retained with proposed trees, hedging, perennial and other plants;

b) proposed parking, access, or pathway layouts, materials and edge details;

c) location, type and materials to be used for hard landscaping including specifications, where applicable for:

i. permeable paving
ii. tree pit design
iii. underground modular systems
iv. sustainable urban drainage integration
v. use within tree Root Protection Areas (RPAs);

d) typical cross sections;

e) a schedule detailing sizes and numbers/densities of all proposed trees/plants;

f) specifications for operations associated with plant establishment and maintenance that are compliant with best practice; and

g) 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 other 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)’ and EAS 03:2022 (EN) ‘Tree Planting Standard’.

REASON:

To ensure the proposed development will preserve and enhance the visual amenity of the locality and is designed for the maximum benefit of local biodiversity, 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 2012; and Policies P13 (Design of Places), P14 (Design Quality), P56 (Protection of Amenity), P57

(Open Space), P60 (Biodiversity) and P61 (Trees) of the Southwark Plan 2022.

48. ARCHAEOLOGICAL REPORTING

Within one year of the completion of the archaeological work on site, an assessment report detailing the proposals for the off-site analyses and post-excavation works, including publication of the site and preparation for deposition of the archive, shall be submitted to and approved in writing by the Local Planning Authority, and the works detailed in the assessment report shall not be carried out otherwise than in accordance with any such approval given. The assessment report shall provide evidence of a commitment to finance and resource these works to their completion.

REASON:

In order that the archaeological interest of the site is secured with regard to the details of the post-excavation works, publication and archiving to ensure the preservation of archaeological remains by record, in accordance with: the National Planning Policy Framework 2024; and Policy P23 (Archaeology) of the Southwark Plan 2022.

49. POST-CONSTRUCTION WHOLE LIFE-CYCLE CARBON REPORTING

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

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

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

REASON:

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

50. POST-COMPLETION CIRCULAR ECONOMY REPORTING

No later than three months following substantial completion of the development hereby consented:

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

b) confirmation of submission of the Post-Completion Circular Economy Report shall be submitted to the Local Planning Authority for approval in writing.

REASON:

To ensure the Planning Stage Circular Economy Statement has been implemented in the construction and delivery of the development, and that all on-going operational measures and mechanisms have been satisfactorily implemented, in order to achieve Circular Economy goals and in accordance with: the National Planning Policy Framework 2024; and Policies GG6 (Increasing Efficiency and Resilience) and SI7 (Reducing Waste and Supporting the Circular Economy) of the London Plan 2021; and Policy P62 (Reducing Waste) of the Southwark Plan 2022.

Permission is subject to the following Biodiversity Net Gain Conditions:

51. BIODIVERSITY GAIN PLAN

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

REASON:

To ensure compliance with Schedule 2A of the Town and Country Planning Act (inserted by the Environment Act 2021).

Informatives

1. INFORMATIVE FROM THAMES WATER REGARDING POTABLE WATER: MINIMUM PRESSURE AND FLOW RATE

Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this

minimum pressure in the design of the proposed development.

2. INFORMATIVE FROM THAMES WATER REGARDING WORKING NEAR OR DIVERTING PIPES

Please read the Thames Water guide 'Working Near Our Assets' to ensure any works carried out will be in line with the necessary processes if working above or near Thames Water pipes or other structures. This can be accessed from: https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes

Should you require further information please contact Thames Water on: developer.services@thameswater.co.uk

3. INFORMATIVE FROM THAMES WATER REGARDING GROUNDWATER RISK MANAGEMENT PERMITS

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

4. 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.

Signed: *Stephen Platts* Director of Planning and Growth

Important Notes Relating to the Council's Decision

1. Conditions

- If permission has been granted you will see that it may be subject to a number of planning conditions. They are an integral part of our decision on your application and are important because they describe how we require you to carry out the approved work or operate the premises. It is YOUR responsibility to comply fully with them. Please pay particular attention to those conditions which have to be met before work commences, such as obtaining approval for the siting and levels of buildings and the protection of trees on the site. If you do not comply with all the conditions in full this may invalidate the permission.

- Further information about how to comply with planning conditions can be found at:

  https://www.planningportal.co.uk/info/200126/applications/60/consent_types/12

- Please note that there is a right of appeal against a planning condition. Further information can be found at: https://www.planningportal.co.uk/info/200207/appeals/108/types_of_appeal

2. Community Infrastructure Levy (CIL) Information

- If your development has been identified as being liable for CIL you need to email Form 1: CIL Additional Information, Form 2: Assumption of Liability and Form 6: Commencement Notice to cil.s106@southwark.gov.uk as soon as possible, so that you can be issued with a Liability Notice. This should be done at least a day before commencement of the approved development.

- **Payment of the CIL charge is mandatory and the CIL Regulations comprises a range of enforcement powers and penalties for failure to following correct procedures to pay, including stop notices, surcharges, late payment interests and prison terms.**

- To identify whether your development is CIL liable, and further details about CIL including eligibility and procedures for any CIL relief claims, please see the Government's CIL guidance:

  https://www.gov.uk/guidance/community-infrastructure-levy

- All CIL Forms are available to download from Planning Portal:

  https://www.planningportal.co.uk/info/200136/policy_and_legislation/70/community_infrastructure_levy/5

- Completed forms and any CIL enquiries should be submitted to cil.s106@southwark.gov.uk

3. National Planning Policy Framework

- In dealing with this application we have implemented the requirements in the National Planning Policy Framework to work with the applicant/agent in a positive, proactive and creative way by offering a pre-application advice service; as appropriate updating applicants/agents of any issues that may arise in the processing of their application and where possible and if applicable suggesting solutions to secure a successful outcome. We have considered the application in light of our statutory policies in our development plan as set out in the officer's report.

4. Appeals to the Secretary of State

- If you are aggrieved by the decision of your local planning authority to grant it subject to conditions, then you can appeal to the Secretary of State under section 78 of the Town and Country Planning Act 1990.

  Appeals can be made online at: https://www.gov.uk/planning-inspectorate.

  If an enforcement notice is or has been served relating to the same or substantially the same land and development as in your application and if you want to appeal against your local planning authority's decision on your application, then you must do so within: **28 days** of the date of service of the enforcement notice, OR within **6 months** (12 weeks in the case of a householder or minor commercial appeal) of the date of this notice, whichever period expires earlier.

- The Secretary of State can allow a longer period for giving notice of an appeal, but he will not normally be prepared to use this power unless there are special circumstances which excuse the delay in giving notice of appeal.

- The Secretary of State need not consider an appeal if it seems to the Secretary of State that the local planning authority could not have granted planning permission for the proposed development or could not have granted it without the conditions they imposed, having regard to the statutory requirements, to the provisions of any development order and to any directions given under a development order.

- If you intend to submit an appeal that you would like examined by inquiry then you must notify the Local Planning Authority and Planning Inspectorate (inquiryappeals@planninginspectorate.gov.uk) at least 10 days before submitting the appeal.

- Further details are on GOV.UK (https://www.gov.uk/government/collections/casework-dealt-with-by-inquiries).

5. Purchase Notice

- If either the local planning authority or the Secretary of State grants permission subject to conditions, the owner may claim that the land can neither be put to a reasonably beneficial use in its existing state nor made capable of reasonably beneficial use by the carrying out of any development which has been or would be permitted. In these circumstances the owner

may serve a purchase notice on the Council requiring the Council to purchase the owner's interest in the land in accordance with Part VI of the Town and Country Planning Act 1990

6. Provisions for the Benefit of the Disabled

- Applicants are reminded that account needs to be taken of the statutory requirements of the Disability Discrimination Act 1995 to provide access and facilities for disabled people where planning permission is granted for any development which provides:

  i. Buildings or premises to which the public are to be admitted whether on payment or otherwise. [Part III of the Act].

  ii. Premises in which people are employed to work as covered by the Health and Safety etc At Work Act 1974 and the Management of Health and Safety at Work Regulations as amended 1999. [Part II of the Act].

  iii. Premises to be used as a university, university college or college, school or hall of a university, or intended as an institution under the terms of the Further and Higher Education Act 1992. [Part IV of the Act].

- Attention is also drawn to British Standard 8300:2001 Disability Access, Access for disabled people to schools buildings – a management and design guide. Building Bulletin 91 (DfEE 99) and Approved Document M (Access to and use of buildings) of the Building Regulations 2000 or any such prescribed replacement.

7. Other Approvals Required Prior to the Implementation of this Permission.

- The granting of approval of a reserved matter or outstanding matter does not relieve developers of the necessity for complying with any Local Acts, regulations, building by-laws and general statutory provisions in force in the area, or allow them to modify or affect any personal or restrictive covenants, easements, etc., applying to or affecting either the land to which the permission relates or any other land or the rights of any persons or authorities (including the London Borough of Southwark) entitled to the benefits thereof or holding an interest in the property concerned in the development permitted or in any adjoining property. In this connection applicants are advised to consult the council's Highway Maintenance section [tel. 020-7525-2000] about any proposed works to, above or under any road, footway or forecourt.

8. Works Affecting the Public Highway

- You are advised to consult the council's Highway Maintenance section [tel. 020-7525-2000] about any proposed works to, above or under any road, footway or forecourt.

9. The Dulwich Estate Scheme of Management

- Development of sites within the area covered by the Scheme of Management may also require the permission of the Dulwich Estate. If your property is in

the Dulwich area with a post code of SE19, 21, 22, 24 or 26 you are advised to consult the Estates Governors', The Old College, Gallery Road SE21 7AE [tel: 020-8299-1000].

10. Building Regulations.

- You are advised to consult Southwark Building Control at the earliest possible moment to ascertain whether your proposal will require consent under the Building Act 1984 [as amended], Building Regulations 2000 [as amended], the London Building Acts or other statutes. A Building Control officer will advise as to the submission of any necessary applications, [tel. call centre number 0845 600 1285].

11. The Party Wall Etc. Act 1996.

- You are advised that you must notify all affected neighbours of work to an existing wall or floor/ceiling shared with another property, a new building on a boundary with neighbouring property or excavation near a neighbouring building. An explanatory booklet aimed mainly at householders and small businesses can be obtained from the Department for Communities and Local Government [DCLG] Free Literature tel: 0870 1226 236 [quoting product code 02BR00862].

12. Important

- This is a PLANNING PERMISSION only and does not operate so as to grant any lease, tenancy or right of occupation of or entry to the land to which it refers.

Appendix 2: Planning Policies

Reference:	24/AP/3687
Proposal:	Redevelopment of the site to provide two separate buildings comprising large scale purpose built shared living (LSPBSL) units, conventional residential dwellings, flexible commercial floorspace, accessible parking, children's play space, public realm improvements, landscaping and other associated works.
Location:	79-161 Ilderton Road, London, Southwark SE16 3JZ

Adopted planning policy

National Planning Policy Framework (NPPF)

1. The revised National Planning Policy Framework ('NPPF'), updated in 2024, sets out the national planning policy and how this should be applied. The NPPF focuses on sustainable development with three key objectives: economic, social and environmental. At its heart is a presumption in favour of sustainable development.

2. Paragraph 231 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications.

3. The relevant chapters of the NPPF are:

- Chapter 2 - Achieving sustainable development
- Chapter 5 - Delivering a sufficient supply of homes
- Chapter 6 - Building a strong, competitive economy
- Chapter 7 - Ensuring the vitality of town centres
- Chapter 8 - Promoting healthy and safe communities
- Chapter 9 - Promoting sustainable transport
- Chapter 11 - Making effective use of land
- Chapter 12 - Achieving well-designed places
- Chapter 14 - Meeting the challenge of climate change, flooding and coastal change
- Chapter 15 - Conserving and enhancing the natural environment
- Chapter 16 - Conserving and enhancing the historic environment

London Plan 2021

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

5. The strategic objectives of the London Plan 2021 are to build strong and inclusive communities, make the best use of land, promote a healthy city, optimise housing delivery including affordable housing, conserve and enhance London's global

competitiveness, and move towards a more resilient and sustainable city. Development proposals must comply with the various policies within the Plan and should follows the guidance set out within Supplementary Planning Documents, Guidance and Strategies.

6. The relevant policies of the London Plan 2021 are:

- GG1 - Building strong and inclusive communities
- GG2 - Making the best use of land
- GG3 - Creating a healthy city
- GG4 - Delivering the homes Londoners need
- GG5 - Growing a good economy
- GG6 - Increasing efficiency and resilience
- Policy SD1 - Opportunity Areas
- Policy SD10 - Strategic and local regeneration
- Policy D1 - London's form, character and capacity for growth
- Policy D2 - Infrastructure requirements for sustainable densities
- Policy D3 - Optimising site capacity through design-led approach
- Policy D4 - Delivering good design
- Policy D5 - Inclusive design
- Policy D6 - Housing quality and standards
- Policy D7 - Accessible housing
- Policy D8 - Public realm
- Policy D9 - Tall Buildings
- Policy D10 - Basement development
- Policy D11 - Safety, security and resilience to emergency
- Policy D12 - Fire safety
- Policy D13 - Agent of change
- Policy D14 - Noise
- Policy H1 - Increasing housing supply
- Policy H4 - Delivering affordable housing
- Policy H5 - Threshold approach to applications
- Policy H6 - Affordable housing tenure
- Policy H7 - Monitoring of affordable housing
- Policy H10 - Housing size mix
- Policy H16 - Large-scale purpose-built shared living
- Policy S1 - Developing London's social infrastructure
- Policy S4 - Play and informal recreation
- Policy E9 - Retail, markets and hot food takeaways
- Policy E11 - Skills and opportunities for all
- Policy HC1 - Heritage conservation and growth
- Policy HC3 - Strategic and local views
- Policy HC4 - London View Management Framework
- Policy G1 - Green infrastructure
- Policy G4 - Open space
- Policy G5 - Urban greening
- Policy G6 - Biodiversity and access to nature
- Policy G7 - Trees and woodlands

- Policy SI 1 - Improving air quality
- Policy SI 2 - Minimising greenhouse gas emissions
- Policy SI 3 - Energy infrastructure
- Policy SI 4 - Managing heat risk
- Policy SI 5 - Water infrastructure
- Policy SI 6 - Digital connectivity infrastructure
- Policy SI 7 - Reducing waste and supporting the circular economy
- Policy SI 8 - Waste capacity and net waste self-sufficiency
- Policy SI 12 - Flood risk management
- Policy SI 13 - Sustainable drainage
- Policy T1 - Strategic approach to transport
- Policy T2 - Healthy Streets
- Policy T3 - Transport capacity, connectivity and safeguarding
- Policy T4 - Assessing and mitigating transport impacts
- Policy T5 - Cycling
- Policy T6 - Car parking
- Policy T6.1 - Residential parking
- Policy T6.2 - Office parking
- Policy T6.3 - Retail parking
- Policy T6.5 - Non-residential disabled persons parking
- Policy T7 - Deliveries, servicing and construction
- Policy T8 - Aviation
- Policy T9 - Funding transport infrastructure through planning
- Policy DF1 - Delivery of the Plan and planning obligations

Relevant London-level Supplementary Planning Documents/ Guidance and Strategies

7. The relevant London-level supplementary planning documents and guidance documents are as follows:

- Mayor of London: Accessible London - Achieving an Inclusive Environment (SPG, 2004)
- Mayor of London: Affordable Housing and Viability (SPG, 2017)
- Mayor of London: Air Quality Neutral (LPG, 2023)
- Mayor of London: Air Quality Positive (LPG, 2023)
- Mayor of London: All London Green Grid (SPG, 2011)
- Mayor of London: 'Be Seen' Energy Monitoring (LPG, 2022)
- Mayor of London: Characterisation and Growth Strategy (LPG, 2023)
- Mayor of London: Circular Economy Statements (LPG, 2022)
- Mayor of London: Climate Change Mitigation and Energy Strategy (2010)
- Mayor of London: Climate Change Adaptation Strategy (2011)
- Mayor of London: Crossrail Funding (SPG, 2016)
- Mayor of London: Digital Connectivity Infrastructure (LPG, 2024)
- Mayor of London: Energy Assessment Guidance (2022)
- Mayor of London: Environment Strategy (2018)
- Mayor of London: Equality, Diversity and Inclusion Strategy

- Mayor of London: Housing (SPG, 2016)
- Mayor of London: Housing Design Standards (LPG, 2023)
- Mayor of London: Housing Strategy (2018)
- Mayor of London: Large-scale Purpose-built Shared Living (LPG, 2024)
- Mayor of London: London's Foundations – Geodiversity (SPG, 2012)
- Mayor of London: London View Management Framework (SPG, 2012)
- Mayor of London: Optimising Site Capacity: a Design-led Approach (LPG, 2023)
- Mayor of London: Planning for Equality and Diversity in London (SPG, 2007)
- Mayor of London: Public London Charter (LPG, 2021)
- Mayor of London: Play and Informal Recreation (SPG, 2012)
- Mayor of London: Shaping Neighbourhoods - Character and Context (SPG, 2014)
- Mayor of London: Social Infrastructure (SPG, 2015)
- Mayor of London: Sustainable Transport, Walking and Cycling (LPG, 2022)
- Mayor of London: The Control of Dust and Emissions During Construction and Demolition (SPG, 2014)
- Mayor of London: Transport Strategy (2018)
- Mayor of London: Urban Greening Factor (LPG, 2023)
- Mayor of London: Whole Life Carbon Assessments (LPG, 2022)

Draft GLA guidance (emerging material considerations)

8. To support the London Plan 2021, the GLA has drafted further London Planning Guidance (LPG) on topic areas including:

- Mayor of London: Affordable Housing (draft – May 2023)
- Mayor of London: Development Viability (draft – May 2023)
- Mayor of London: Fire safety (draft – February 2022)

Southwark Plan

9. The Southwark Plan 2022 includes Strategic Policies, Area Visions and Development Management Policies. The most relevant strategic policies are as follows:

- ST1 - Southwark's development targets
- ST2 - Southwark's places
- SP1 - Homes for all
- SP2 - Southwark together
- SP3 - A great start in life
- SP4 - Green and inclusive economy
- SP5 - Thriving and neighbourhoods and tackling health equalities
- SP6 - Climate emergency
- AV.13 - Old Kent Road Area Vision
- Policy P1 - Social rented and intermediate housing

- Policy P2 - New family homes
- Policy P6 - Purpose built shared living
- Policy P8 - Wheelchair accessible and adaptable housing
- Policy P13 - Design of places
- Policy P14 - Design quality
- Policy P15 - Residential design
- Policy P16 - Designing out crime
- Policy P17 - Tall Buildings
- Policy P18 - Efficient use of land
- Policy P21 - Conservation of the historic environment and natural heritage
- Policy P22 - Borough Views
- Policy P23 - Archaeology
- Policy P26 - Local List
- Policy P28 - Access to employment and training
- Policy P36 - Development outside town centres
- Policy P39 - Shop fronts
- Policy P40 - Betting shops, pawnbrokers and pay day loan shops
- Policy P43 - Outdoor advertisements and signage
- Policy P44 - Broadband and digital infrastructure
- Policy P45 - Healthy developments
- Policy P47 - Community uses
- Policy P48 - Hot food takeaways
- Policy P49 - Public transport
- Policy P50 - Highway impacts
- Policy P51 - Walking
- Policy P53 - Cycling
- Policy P54 - Car parking
- Policy P55 - Parking standards for disabled people and the physically impaired
- Policy P56 - Protection of amenity
- Policy P57 - Open space
- Policy P59 - Green infrastructure
- Policy P60 - Biodiversity
- Policy P61 - Trees
- Policy P62 - Reducing waste
- Policy P64 - Contaminated land and hazardous substances
- Policy P65 - Improving air quality
- Policy P66 - Reducing noise pollution and enhancing soundscapes
- Policy P67 - Reducing water use
- Policy P68 - Reducing flood risk
- Policy P69 - Sustainability standards
- Policy P70 - Energy
- Policy IP1 - Infrastructure
- Policy IP2 - Transport infrastructure
- Policy IP3 - Community infrastructure levy (CIL) and Section 106 planning obligations
- Policy IP6 - Monitoring development

- Policy IP7 - Statement of community involvement

Relevant Local-level Supplementary Planning Documents

10. The relevant supplementary planning documents and guidance documents from the local development plan are as follows:

- 2015 Technical Update to the Residential Design Standards 2011 (SPD, 2015)
- Affordable Housing (Draft SPD, 2011)
- Design and Access Statements (SPD, 2007)
- Development Viability (SPD, 2016)
- Heritage (SPD, 2021)
- Section 106 Planning Obligations and Community Infrastructure Levy (SPD, 2015 with 2020 Addendum)

Relevant draft Area Action Plans

11. The relevant draft Area Action Plan is:

- Old Kent Road (draft AAP, 2024)

Appendix 3: Relevant planning history

Reference:	24/AP/3687
Proposal:	Redevelopment of the site to provide two separate buildings comprising large scale purpose built shared living (LSPBSL) units, conventional residential dwellings, flexible commercial floorspace, accessible parking, children's play space, public realm improvements, landscaping and other associated works.
Location:	79-161 Ilderton Road, London, Southwark SE16 3JZ

Planning History

Application site:

1. **79-161 Ilderton Road**

Reference Number: 23/AP/0387
Application Type: Full Planning Permission

> Redevelopment of the site to provide two separate buildings comprising large scale purpose built shared living units, conventional residential dwellings, flexible commercial and community floorspace, a not-for-profit café community use, children's playspace, public realm improvements, landscaping and other associated works.

Decision: Granted with legal agreement
Decision date: 30 September 2024

2. **79-161 Ilderton Road**

Reference Number: 18/AP/2497
Application Type: Full Planning Permission

> Redevelopment of 79-161 Ilderton Road to provide two separate buildings, a north building and a south building separated by a publicly accessible children's playspace.
>
> The erection of a north building to include a part 5, part 6, part 16 and part 28 storey development (93.350m AOD max).
>
> The erection of a south building to include a part 3, part 5, part 8, part 13 storey development (49.275m AOD max).

	To deliver a total of 312 residential units, 448.6sqm GIA of retail floorspace (Use Class A1); 1,817.98sqm GIA of commercial floorspace (Use Class B1) and associated basement provision, disabled parking, cycle parking, children's playspace, public realm improvements and landscaping. This application represents a departure from strategic policy 10 'Jobs and Businesses' of the Core Strategy (2011) and Saved Policy 1.2 'Strategic and Local Preferred Industrial Locations' of the Southwark Plan (2007) by virtue of proposing to introduce residential accommodation in a Preferred Industrial Location. Decision: Granted with legal agreement Decision date: 21 February 2022
Other nearby sites:	
3.	**<u>Ilderton Wharf, 1-7 Rollins Street</u>** Reference Number: 24/AP/3575 Application Type: Full Planning Permission Demolition of the existing buildings on the site and the construction of a linked building with a tower housing purpose built student accommodation (Use Class Sui Generis), a shoulder element housing affordable residential housing (Class C3) both with basement level, and an industrial building including affordable workspace at the southern element of the Site (Classes B2, B8, E(g)(iii), and Sui Generis), alongside the delivery of a flexible Class E unit at ground floor level, and a mixed community cafe and PBSA co-working space (Class E/Sui Generis) at ground floor level on the corner of Ilderton Road and Surrey Canal Road, in addition to the delivery of hard and soft landscaping, pedestrian and vehicle access including the provision of a loading bay on Ilderton Road, cycle parking, blue badge car parking, wider public realm improvements including new public open space, with associated highway works and all other ancillary works associated with the development. Decision: Pending / under LPA's assessment Decision date: 21 February 2022
4.	**<u>257 - 283 Ilderton Road</u>** Reference Number: 23/AP/1317 Application Type: Full Planning Permission Demolition of the existing building and redevelopment of the site to deliver a mixed-use development comprising Purpose-Built Student

	Housing (Use Class Sui Generis), a new self-storage facility (Use Class B8), light Industrial workspace / incubator units (Use Class E(g)(iii)) and other associated infrastructure. Decision: Refused (appeal lodged) Decision date: 20 February 2025
5.	**18-22 Penarth Street** Reference Number: 22/AP/1603 Application Type: Full Planning Permission Demolition of existing buildings and construction of a mixed-use part 8, part 9, part 10 storey building comprising of 4,195sqm of light industrial (Class E(g)(iii) use), studio and office (Class E(g)(i and ii) use) workspaces at ground and mezzanine floor levels with 283 co-living studios and supporting amenity facilities (Sui Generis use) and 47 (36.55% Affordable by habitable rooms) residential homes (Class C3 use) above, together with servicing arrangements, cycle parking, external amenity spaces, landscaping and associated works. Decision: Resolution to grant, pending legal agreement Decision date: Pending
6.	**Ilderton Wharf, 1-7 Rollins Street** Reference Number: 21/AP/4757 Application Type: Full Planning Permission Demolition of existing buildings and erection of a mixed use development comprising a building of part 9, 23 and 25 storeys above ground to provide a replacement builders merchants with associated office, trade counter sales area , showroom and external storage/racking, a commercial unit fronting Ilderton Road (Use Class E) 163 residential apartments (Use Class C3) and other associated infrastructure. Decision: Resolution to grant, pending legal agreement Decision date: 28 June 2024
7.	**301 - 303 Ilderton Road** Reference Number: 20/AP/3560 Application Type: Full Planning Permission Demolition of existing buildings and construction of a 15 storey building comprising 59 residential dwellings (Class C3) and commercial floorspace (Class E(g), with landscaping (including a

	communal roof garden and ground floor playspace), cycle parking and associated ancillary development. Decision: Granted with legal agreement Decision date: 28 Jun 2023
8.	**313-349 Ilderton Road** Reference Number: 20/AP/1329 Application Type: Full Planning Permission Demolition of existing buildings and construction of two buildings, one of part 11 and 13 storeys and one of part 13 and 15 storeys, to provide 1,739sq.m (GIA) of commercial floorspace, 250 student accommodation bed spaces (Sui Generis) and 58 residential units, with associated access and highway works, amenity space, cycle parking spaces, disabled car parking spaces and refuse/ recycling stores. Decision: Granted with legal agreement Decision date: 13 May 2021
9.	**227 - 255 Ilderton Road** Reference Number: 19/AP/1773 Application Type: Full Planning Permission Demolition of existing buildings and the erection of a part 2/3, 9 and 28 storey (up to 94.65m AOD) mixed-use development comprising of 3,581 sqm including 2,538 sqm of industrial floorspace (Use Classes B1c/B8) at ground and intermediate levels, 598 sqm of internal loading yard, 445 sqm ancillary plant and equipment; and 253 residential apartments (C3), 35.75% affordable by habitable room, and other associated infrastructure. This application represents a departure from strategic policy 10 'Jobs and Businesses' of the Core Strategy (2011) and Saved Policy 1.2 'Strategic and Local Preferred Industrial Locations' of the Southwark Plan (2007) by virtue of proposing to introduce residential accommodation in a preferred industrial location. Decision: Granted with legal agreement Decision date: 29 Jan 2021
10.	**Iberia House, 2 Hatcham Road** Reference Number: 17/AP/4649 Application Type: Full Planning Permission

	Demolition of existing light industrial building and construction of a building ranging in height from 2 to 9 storeys comprising 915.5sqm of B1 commercial and employment space at ground and first floor levels and 33 residential flats over the second to eight floor levels, with 3 residential parking spaces accessed from Hatcham Road. Decision: Granted with legal agreement Decision date: 29 May 2020
11.	**180 Ilderton Road** Reference Number: 17/AP/4546 Application Type: Full Planning Permission Demolition of existing building and erection of a part 5, 8 and 9 storey plus basement mixed-use development (max height 29.98m) comprising 2,351 sqm (gia) of flexible workspace (Use Class B1) and 84 residential apartments (Use Class C3) with associated amenity space and ancillary infrastructure. Decision: Granted with legal agreement Decision date: 13 September 2018
12.	**Surrey Canal Triangle** London Borough of Lewisham Reference number: DC/13/085143 Application Type: Minor Material Amendment An application submitted under Section 73 of the Town & Country Planning Act 1990 for a minor material amendment to planning permission (DC/11/76357) for the comprehensive, phased, mixed use development of the site on the land to the north and south of Surrey Canal Road, for up to 240,000sqm (GEA) of development as set out in the revised Development Specification dated 1 July 2011 as amended 2 September 2011. The principal elements of the outline planning permission comprise up to 2,400 homes (Class C3); retail (Class A1-A5); business space (Class B1); hotel (Class C1); non-residential institutions (Class D1); assembly and leisure (Class D2) excluding the Millwall FC stadium. The demolition of all existing buildings on the site with the exception of the Millwall FC Stadium (retained and its facade upgraded and/or re-clad), Guild House (retained and extended) and Rollins House (retained); re-profiling of site levels; alterations to Surrey Canal Road and the re-alignment of Bolina Road; associated works and landscaping in order to allow alterations to the development by way of:- The reconfiguration of buildings on Plots Timber Wharf,

Stockholm 1 & 2 and Senegal Way 1& 2 and the redistribution of land uses between these Plots, within the overall approved development by floorspace area and land use.

Amendments to the massing of buildings and their heights on Plots Timber Wharf, Stockholm 1 & 2 and Senegal Way 1& 2 as well as changes to the distribution of uses amongst these Plots including the redistribution of part of the proposed residential accommodation from the south side of Surrey Canal Road to the north and of the approved leisure uses.

Amendments to the Parameter Plans to reflect the changes referred to above, principally in respect of the massing of buildings and building heights, an alteration to a parking space and loading bay, landscape, open space and public realm; massing of buildings and building heights for Plots: Timber Wharf 1 and Timber Wharf 2 (Phase 2), Stockholm 1 and Stockholm 2 (Phase 3), Senegal Way 1 and Senegal Way 2 (Phase 4).

Decision: Granted with legal agreement
Decision date: 18 Dec 2015

Appendix 4: Consultation undertaken

Reference:	23/AP/0387
Proposal:	Redevelopment of the site to provide two separate buildings comprising large scale purpose built shared living units, conventional residential dwellings, flexible commercial and community floorspace, a not-for-profit café community use, children's playspace, public realm improvements, landscaping and other associated works.
Location:	79-161 Ilderton Road, London, Southwark SE16 3JZ

Consultation Undertaken

Notices:

Site Notice: Date of notice display: 19.12.2024 Expiry date of notice: 12.01.2025

Press Notice: Date of notice publication: 09.01.2025 Expiry date of notice: 30.01.2025

Consultation Letters sent to Neighbours and Local Groups:

Address:	Date printed:
19 Delaford Road London Southwark SE16 3BQ	30.12.2024
27 Bramcote Grove London Southwark SE16 3BN	30.12.2024
13 Bramcote Grove London Southwark SE16 3BN	30.12.2024
88 Verney Road London Southwark SE16 3DB	30.12.2024
Flat 3 114 Verney Road London Southwark SE16 3DB	30.12.2024
Flat 6 56 Barkworth Road London Southwark SE16 3BZ	30.12.2024
43 Barkworth Road London Southwark SE16 3BZ	30.12.2024
35 Barkworth Road London Southwark SE16 3BZ	30.12.2024
Flat 6 16 Barkworth Road London Southwark SE16 3BZ	30.12.2024
Unit A1 Atar House 179 Ilderton Road London Southw	30.12.2024
33 Ablett Street London Southwark SE16 3BL	30.12.2024
28 Ablett Street London Southwark SE16 3BP	30.12.2024
1 Ablett Street London Southwark SE16 3BL	30.12.2024
Flat 1 45 Barkworth Road London Southwark SE16 3BZ	30.12.2024
32 Delaford Road London Southwark SE16 3BS	30.12.2024
34 Delaford Road London Southwark SE16 3BS	30.12.2024
33 Barkworth Road London Southwark SE16 3BZ	30.12.2024
48 Barkworth Road London Southwark SE16 3BZ	30.12.2024
14 Delaford Road London Southwark SE16 3BS	30.12.2024
33 Delaford Road London Southwark SE16 3BQ	30.12.2024
21 Bramcote Grove London Southwark SE16 3BN	30.12.2024
41 Ilderton Road London Southwark SE16 3JU	30.12.2024
37 Ilderton Road London Southwark SE16 3JU	30.12.2024
30 Delaford Road London Southwark SE16 3BS	30.12.2024
5 Delaford Road London Southwark SE16 3BQ	30.12.2024
29 Delaford Road London Southwark SE16 3BQ	30.12.2024
31 Bramcote Grove London Southwark SE16 3BN	30.12.2024

Flat 4 55 Varcoe Road London Southwark SE16 3DE	30.12.2024
41 Varcoe Road London Southwark SE16 3DE	30.12.2024
8 Splendour Walk London Southwark SE16 3BT	30.12.2024
104 Verney Road London Southwark SE16 3DB	30.12.2024
90 Verney Road London Southwark SE16 3DB	30.12.2024
Flat 2 114 Verney Road London Southwark SE16 3DB	30.12.2024
Flat 7 47 Barkworth Road London Southwark SE16 3BZ	30.12.2024
Flat 4 47 Barkworth Road London Southwark SE16 3BZ	30.12.2024
Flat 5 56 Barkworth Road London Southwark SE16 3BZ	30.12.2024
Flat 7 52 Barkworth Road London Southwark SE16 3BZ	30.12.2024
37 Barkworth Road London Southwark SE16 3BZ	30.12.2024
24 Ablett Street London Southwark SE16 3BP	30.12.2024
22 Ablett Street London Southwark SE16 3BP	30.12.2024
18 Ablett Street London Southwark SE16 3BP	30.12.2024
17 Ablett Street London Southwark SE16 3BL	30.12.2024
7 Ablett Street London Southwark SE16 3BL	30.12.2024
Flat 204 Milli House 171 - 177 Ilderton Road Londo	30.12.2024
23 Ilderton Road London Southwark SE16 3JU	30.12.2024
31 Barkworth Road London Southwark SE16 3BZ	30.12.2024
Flat 2 45 Barkworth Road London Southwark SE16 3BZ	30.12.2024
Flat 5 16 Barkworth Road London Southwark SE16 3BZ	30.12.2024
43 Ilderton Road London Southwark SE16 3JU	30.12.2024
27 Ilderton Road London Southwark SE16 3JU	30.12.2024
25 Ilderton Road London Southwark SE16 3JU	30.12.2024
36 Delaford Road London Southwark SE16 3BS	30.12.2024
16 Delaford Road London Southwark SE16 3BS	30.12.2024
9 Bramcote Grove London Southwark SE16 3BN	30.12.2024
61 Varcoe Road London Southwark SE16 3DE	30.12.2024
Flat 2 55 Varcoe Road London Southwark SE16 3DE	30.12.2024
6 Splendour Walk London Southwark SE16 3BT	30.12.2024
9 Splendour Walk London Southwark SE16 3BT	30.12.2024
110 Verney Road London Southwark SE16 3DB	30.12.2024
Flat 8 47 Barkworth Road London Southwark SE16 3BZ	30.12.2024
Flat 5 47 Barkworth Road London Southwark SE16 3BZ	30.12.2024
Flat 6 45 Barkworth Road London Southwark SE16 3BZ	30.12.2024
39 Barkworth Road London Southwark SE16 3BZ	30.12.2024
Flat 1 16 Barkworth Road London Southwark SE16 3BZ	30.12.2024
44 Barkworth Road London Southwark SE16 3BZ	30.12.2024
Unit A2 Atar House 179 Ilderton Road London Southw	30.12.2024
Flat 11 Atar House 179 Ilderton Road London Southw	30.12.2024
Flat 5 Atar House 179 Ilderton Road London Southwa	30.12.2024
Flat 4 Atar House 179 Ilderton Road London Southwa	30.12.2024
Flat 3 Atar House 179 Ilderton Road London Southwa	30.12.2024
34 Ablett Street London Southwark SE16 3BP	30.12.2024
30 Ablett Street London Southwark SE16 3BP	30.12.2024
26 Ablett Street London Southwark SE16 3BP	30.12.2024
Flat 102 Milli House 171 - 177 Ilderton Road Londo	30.12.2024
Flat 101 Milli House 171 - 177 Ilderton Road Londo	30.12.2024
108 Verney Road London Southwark SE16 3DB	30.12.2024
1 Splendour Walk London Southwark SE16 3BT	30.12.2024
27 Barkworth Road London Southwark SE16 3BZ	30.12.2024

7 Delaford Road London Southwark SE16 3BQ	30.12.2024
1 Bramcote Grove London Southwark SE16 3BN	30.12.2024
119 Verney Road London Southwark SE16 3DA	30.12.2024
35 Ilderton Road London Southwark SE16 3JU	30.12.2024
12 Delaford Road London Southwark SE16 3BS	30.12.2024
23 Bramcote Grove London Southwark SE16 3BN	30.12.2024
Flat 3 59 Varcoe Road London Southwark SE16 3DE	30.12.2024
Flat 1 59 Varcoe Road London Southwark SE16 3DE	30.12.2024
29 Varcoe Road London Southwark SE16 3DE	30.12.2024
27 Varcoe Road London Southwark SE16 3DE	30.12.2024
3 Splendour Walk London Southwark SE16 3BT	30.12.2024
94 Verney Road London Southwark SE16 3DB	30.12.2024
129 Verney Road London Southwark SE16 3DA	30.12.2024
127 Verney Road London Southwark SE16 3DA	30.12.2024
Flat 3 45 Barkworth Road London Southwark SE16 3BZ	30.12.2024
Flat 4 16 Barkworth Road London Southwark SE16 3BZ	30.12.2024
Flat 9 Atar House 179 Ilderton Road London Southwa	30.12.2024
Flat 2 Atar House 179 Ilderton Road London Southwa	30.12.2024
Flat 1 Atar House 179 Ilderton Road London Southwa	30.12.2024
32 Ablett Street London Southwark SE16 3BP	30.12.2024
29 Ablett Street London Southwark SE16 3BL	30.12.2024
27 Ablett Street London Southwark SE16 3BL	30.12.2024
21 Ablett Street London Southwark SE16 3BL	30.12.2024
16 Ablett Street London Southwark SE16 3BP	30.12.2024
179A Ilderton Road London Southwark SE16 3LA	30.12.2024
Flat 4 45 Barkworth Road London Southwark SE16 3BZ	30.12.2024
Flat 8 45 Barkworth Road London Southwark SE16 3BZ	30.12.2024
17 Delaford Road London Southwark SE16 3BQ	30.12.2024
15 Bramcote Grove London Southwark SE16 3BN	30.12.2024
5 Splendour Walk London Southwark SE16 3BT	30.12.2024
Flat 6 77 Ilderton Road London Southwark SE16 3JU	30.12.2024
Flat 12 Atar House 179 Ilderton Road London Southw	30.12.2024
Flat 8 Atar House 179 Ilderton Road London Southwa	30.12.2024
Flat 6 Atar House 179 Ilderton Road London Southwa	30.12.2024
25 Ablett Street London Southwark SE16 3BL	30.12.2024
23 Ablett Street London Southwark SE16 3BL	30.12.2024
12 Ablett Street London Southwark SE16 3BP	30.12.2024
8 Ablett Street London Southwark SE16 3BP	30.12.2024
5 Ablett Street London Southwark SE16 3BL	30.12.2024
2 Ablett Street London Southwark SE16 3BP	30.12.2024
Unit B Milli House 171 - 177 Ilderton Road London	30.12.2024
Flat 202 Milli House 171 - 177 Ilderton Road Londo	30.12.2024
Flat 104 Milli House 171 - 177 Ilderton Road Londo	30.12.2024
49 Ilderton Road London Southwark SE16 3JU	30.12.2024
3 Delaford Road London Southwark SE16 3BQ	30.12.2024
13 Delaford Road London Southwark SE16 3BQ	30.12.2024
121 Verney Road London Southwark SE16 3DA	30.12.2024
42 Barkworth Road London Southwark SE16 3BZ	30.12.2024
Flat 1 54 Barkworth Road London Southwark SE16 3BZ	30.12.2024
11 Delaford Road London Southwark SE16 3BQ	30.12.2024
Flat 2 16 Barkworth Road London Southwark SE16 3BZ	30.12.2024

1A Zampa Road London Southwark SE16 3LH	30.12.2024
26 Delaford Road London Southwark SE16 3BS	30.12.2024
37 Delaford Road London Southwark SE16 3BQ	30.12.2024
11 Bramcote Grove London Southwark SE16 3BN	30.12.2024
27 Delaford Road London Southwark SE16 3BQ	30.12.2024
3 Bramcote Grove London Southwark SE16 3BN	30.12.2024
49 Varcoe Road London Southwark SE16 3DE	30.12.2024
4 Splendour Walk London Southwark SE16 3BT	30.12.2024
Flat 4 59 Varcoe Road London Southwark SE16 3DE	30.12.2024
Flat 5 55 Varcoe Road London Southwark SE16 3DE	30.12.2024
43 Varcoe Road London Southwark SE16 3DE	30.12.2024
10 Ablett Street London Southwark SE16 3BP	30.12.2024
125 Verney Road London Southwark SE16 3DA	30.12.2024
Flat 1 47 Barkworth Road London Southwark SE16 3BZ	30.12.2024
Flat 7 45 Barkworth Road London Southwark SE16 3BZ	30.12.2024
Flat 2 56 Barkworth Road London Southwark SE16 3BZ	30.12.2024
Flat 6 114 Verney Road London Southwark SE16 3DB	30.12.2024
Flat 2 47 Barkworth Road London Southwark SE16 3BZ	30.12.2024
Flat 3 56 Barkworth Road London Southwark SE16 3BZ	30.12.2024
Flat 8 54 Barkworth Road London Southwark SE16 3BZ	30.12.2024
Flat 7 54 Barkworth Road London Southwark SE16 3BZ	30.12.2024
Flat 5 54 Barkworth Road London Southwark SE16 3BZ	30.12.2024
29 Barkworth Road London Southwark SE16 3BZ	30.12.2024
50 Barkworth Road London Southwark SE16 3BZ	30.12.2024
36 Barkworth Road London Southwark SE16 3BZ	30.12.2024
Flat 4 77 Ilderton Road London Southwark SE16 3JU	30.12.2024
19 Bramcote Grove London Southwark SE16 3BN	30.12.2024
Flat 3 54 Barkworth Road London Southwark SE16 3BZ	30.12.2024
The Waterhouse Project 3 Stockholm Road London Sou	30.12.2024
Flat 6 55 Varcoe Road London Southwark SE16 3DE	30.12.2024
Flat 1 77 Ilderton Road London Southwark SE16 3JU	30.12.2024
77 Ilderton Road London Southwark SE16 3JU	30.12.2024
39 Jarrow Road London Southwark SE16 3JR	30.12.2024
Flat 1 55 Varcoe Road London Southwark SE16 3DE	30.12.2024
106 Verney Road London Southwark SE16 3DB	30.12.2024
Flat 7 Atar House 179 Ilderton Road London Southwa	30.12.2024
37 Ablett Street London Southwark SE16 3BL	30.12.2024
35 Ablett Street London Southwark SE16 3BL	30.12.2024
19 Ablett Street London Southwark SE16 3BL	30.12.2024
4 Ablett Street London Southwark SE16 3BP	30.12.2024
Flat 2 141 Verney Road London Southwark SE16 3AY	30.12.2024
Flat 6 141 Verney Road London Southwark SE16 3AY	30.12.2024
Flat 9 141 Verney Road London Southwark SE16 3AY	30.12.2024
Unit A Milli House 171 - 177 Ilderton Road London	30.12.2024
Flat 301 Milli House 171 - 177 Ilderton Road Londo	30.12.2024
Flat 203 Milli House 171 - 177 Ilderton Road Londo	30.12.2024
29 Ilderton Road London Southwark SE16 3JU	30.12.2024
24 Barkworth Road London Southwark SE16 3BZ	30.12.2024
41 Delaford Road London Southwark SE16 3BQ	30.12.2024
33 Bramcote Grove London Southwark SE16 3BN	30.12.2024
Flat 7 56 Barkworth Road London Southwark SE16 3BZ	30.12.2024

131 Verney Road London Southwark SE16 3DA	30.12.2024
47 Ilderton Road London Southwark SE16 3JU	30.12.2024
Flat 1 56 Barkworth Road London Southwark SE16 3BZ	30.12.2024
41 Barkworth Road London Southwark SE16 3BZ	30.12.2024
39 Varcoe Road London Southwark SE16 3DE	30.12.2024
92 Verney Road London Southwark SE16 3DB	30.12.2024
Ilderton Primary School Ilderton Road London South	30.12.2024
32 Barkworth Road London Southwark SE16 3BZ	30.12.2024
31 Ilderton Road London Southwark SE16 3JU	30.12.2024
24 Delaford Road London Southwark SE16 3BS	30.12.2024
25 Delaford Road London Southwark SE16 3BQ	30.12.2024
21 Delaford Road London Southwark SE16 3BQ	30.12.2024
7 Bramcote Grove London Southwark SE16 3BN	30.12.2024
37 Bramcote Grove London Southwark SE16 3BN	30.12.2024
Flat 8 56 Barkworth Road London Southwark SE16 3BZ	30.12.2024
Flat 4 54 Barkworth Road London Southwark SE16 3BZ	30.12.2024
Flat 6 52 Barkworth Road London Southwark SE16 3BZ	30.12.2024
Flat 3 52 Barkworth Road London Southwark SE16 3BZ	30.12.2024
22 Barkworth Road London Southwark SE16 3BZ	30.12.2024
Unit A3 Atar House 179 Ilderton Road London Southw	30.12.2024
31 Ablett Street London Southwark SE16 3BL	30.12.2024
20 Ablett Street London Southwark SE16 3BP	30.12.2024
15 Ablett Street London Southwark SE16 3BL	30.12.2024
13 Ablett Street London Southwark SE16 3BL	30.12.2024
11 Ablett Street London Southwark SE16 3BL	30.12.2024
9 Ablett Street London Southwark SE16 3BL	30.12.2024
6 Ablett Street London Southwark SE16 3BP	30.12.2024
3 Ablett Street London Southwark SE16 3BL	30.12.2024
Flat 201 Milli House 171 - 177 Ilderton Road Londo	30.12.2024
Flat 103 Milli House 171 - 177 Ilderton Road Londo	30.12.2024
34 Barkworth Road London Southwark SE16 3BZ	30.12.2024
Flat 5 45 Barkworth Road London Southwark SE16 3BZ	30.12.2024
Flat 8 52 Barkworth Road London Southwark SE16 3BZ	30.12.2024
1 Delaford Road London Southwark SE16 3BQ	30.12.2024
5 Bramcote Grove London Southwark SE16 3BN	30.12.2024
Flat 3 55 Varcoe Road London Southwark SE16 3DE	30.12.2024
Flat 4 114 Verney Road London Southwark SE16 3DB	30.12.2024
38 Delaford Road London Southwark SE16 3BS	30.12.2024
22 Delaford Road London Southwark SE16 3BS	30.12.2024
43 Delaford Road London Southwark SE16 3BQ	30.12.2024
35 Delaford Road London Southwark SE16 3BQ	30.12.2024
15 Delaford Road London Southwark SE16 3BQ	30.12.2024
25 Bramcote Grove London Southwark SE16 3BN	30.12.2024
57 Varcoe Road London Southwark SE16 3DE	30.12.2024
45 Varcoe Road London Southwark SE16 3DE	30.12.2024
37 Varcoe Road London Southwark SE16 3DE	30.12.2024
35 Varcoe Road London Southwark SE16 3DE	30.12.2024
31 Varcoe Road London Southwark SE16 3DE	30.12.2024
7 Splendour Walk London Southwark SE16 3BT	30.12.2024
100 Verney Road London Southwark SE16 3DB	30.12.2024
96 Verney Road London Southwark SE16 3DB	30.12.2024

84 Verney Road London Southwark SE16 3DB	30.12.2024
135 Verney Road London Southwark SE16 3DA	30.12.2024
133 Verney Road London Southwark SE16 3DA	30.12.2024
Flat 4 52 Barkworth Road London Southwark SE16 3BZ	30.12.2024
Flat 1 52 Barkworth Road London Southwark SE16 3BZ	30.12.2024
Flat 3 16 Barkworth Road London Southwark SE16 3BZ	30.12.2024
46 Barkworth Road London Southwark SE16 3BZ	30.12.2024
40 Barkworth Road London Southwark SE16 3BZ	30.12.2024
30 Barkworth Road London Southwark SE16 3BZ	30.12.2024
Flat 10 Atar House 179 Ilderton Road London Southw	30.12.2024
14 Ablett Street London Southwark SE16 3BP	30.12.2024
Flat 12 141 Verney Road London Southwark SE16 3AY	30.12.2024
Flat 11 141 Verney Road London Southwark SE16 3AY	30.12.2024
Flat 8 141 Verney Road London Southwark SE16 3AY	30.12.2024
Flat 13 141 Verney Road London Southwark SE16 3AY	30.12.2024
Christ Apostolic Church 163 Ilderton Road London S	30.12.2024
20 Barkworth Road London Southwark SE16 3BZ	30.12.2024
Flat 3 77 Ilderton Road London Southwark SE16 3JU	30.12.2024
29 Bramcote Grove London Southwark SE16 3BN	30.12.2024
23 Delaford Road London Southwark SE16 3BQ	30.12.2024
Flat 3 141 Verney Road London Southwark SE16 3AY	30.12.2024
Flat 4 141 Verney Road London Southwark SE16 3AY	30.12.2024
Flat 5 141 Verney Road London Southwark SE16 3AY	30.12.2024
Flat 10 141 Verney Road London Southwark SE16 3AY	30.12.2024
Flat 1 141 Verney Road London Southwark SE16 3AY	30.12.2024
Flat 7 141 Verney Road London Southwark SE16 3AY	30.12.2024
Flat 2 77 Ilderton Road London Southwark SE16 3JU	30.12.2024
Flat 1 35 Bramcote Grove London Southwark SE16 3BN	30.12.2024
33 Ilderton Road London Southwark SE16 3JU	30.12.2024
45 Ilderton Road London Southwark SE16 3JU	30.12.2024
Flat 2 35 Bramcote Grove London Southwark SE16 3BN	30.12.2024
Flat 1 114 Verney Road London Southwark SE16 3DB	30.12.2024
Flat 6 47 Barkworth Road London Southwark SE16 3BZ	30.12.2024
Flat 3 47 Barkworth Road London Southwark SE16 3BZ	30.12.2024
123 Verney Road London Southwark SE16 3DA	30.12.2024
137 Verney Road London Southwark SE16 3DA	30.12.2024
20 Delaford Road London Southwark SE16 3BS	30.12.2024
Flat 5 52 Barkworth Road London Southwark SE16 3BZ	30.12.2024
Flat 2 52 Barkworth Road London Southwark SE16 3BZ	30.12.2024
Flat 4 56 Barkworth Road London Southwark SE16 3BZ	30.12.2024
Flat 6 54 Barkworth Road London Southwark SE16 3BZ	30.12.2024
39 Ilderton Road London Southwark SE16 3JU	30.12.2024
21 Ilderton Road London Southwark SE16 3JU	30.12.2024
28 Delaford Road London Southwark SE16 3BS	30.12.2024
18 Barkworth Road London Southwark SE16 3BZ	30.12.2024
38 Barkworth Road London Southwark SE16 3BZ	30.12.2024
26 Barkworth Road London Southwark SE16 3BZ	30.12.2024
102 Verney Road London Southwark SE16 3DB	30.12.2024
86 Verney Road London Southwark SE16 3DB	30.12.2024
112 Verney Road London Southwark SE16 3DB	30.12.2024
98 Verney Road London Southwark SE16 3DB	30.12.2024

28 Barkworth Road London Southwark SE16 3BZ	30.12.2024
51 Varcoe Road London Southwark SE16 3DE	30.12.2024
53 Varcoe Road London Southwark SE16 3DE	30.12.2024
25 Varcoe Road London Southwark SE16 3DE	30.12.2024
Flat 2 59 Varcoe Road London Southwark SE16 3DE	30.12.2024
47 Varcoe Road London Southwark SE16 3DE	30.12.2024
33 Varcoe Road London Southwark SE16 3DE	30.12.2024
Flat 5 77 Ilderton Road London Southwark SE16 3JU	30.12.2024
South Bermondsey Railway Station Rotherhithe New R	30.12.2024
Flat 14 141 Verney Road London Southwark SE16 3AY	30.12.2024
18 Delaford Road London Southwark SE16 3BS	30.12.2024
17 Bramcote Grove London Southwark SE16 3BN	30.12.2024
Flat 5 114 Verney Road London Southwark SE16 3DB	30.12.2024
Flat 2 54 Barkworth Road London Southwark SE16 3BZ	30.12.2024
25 Barkworth Road London Southwark SE16 3BZ	30.12.2024
39 Delaford Road London Southwark SE16 3BQ	30.12.2024
2 Splendour Walk London Southwark SE16 3BT	30.12.2024
9 Delaford Road London Southwark SE16 3BQ	30.12.2024
31 Delaford Road London Southwark SE16 3BQ	30.12.2024

Consultation Letters sent to Internal Consultees:

Initial consultation carried out with all internal consultees, on 30.12.2024.

Re-consultation Letters sent to Internal Consultees:

Name of Internal Consultee:	Date re-consulted:	Reply received?
• Community Infrastructure Levy Team	14.03.2025	**YES**
• Design & Conservation Team (Old Kent Rd)	31.03.2025	**YES**
• Ecology	31.03.2025	**YES**
• Environmental Protection	05.02.2025	**YES**
• Environmental Protection	03.04.2025	**YES**
• Flood Risk Management & Urban Drainage	13.02.2025	**YES**
• Highways Development and Management	20.02.2025	**YES**
• Highways Development and Management	31.03.2025	**YES**
• Local Economy	30.04.2025	**YES**
• Planning Policy (Energy)	17.02.2025	**YES**
• Transport Policy	31.03.2025	**YES**
• Urban Forester	04.03.2025	**YES**

Consultation Letters sent to External Consultees:

Initial consultation carried out with all external consultees, on 30.12.2024.

Re-consultation Letters sent to External Consultees:

Name of External Consultee:	Date re-consulted:	Reply received?
• London Fire & Emergency Planning Authority	29.04.2025	No
• Metropolitan Police Service (Designing Out Crime Unit)	29.01.2025	**YES**

• Network Rail	03.04.2025	**YES**
• TfL Spatial Planning	09.04.2025	**YES**
• Thames Water	16.02.2025	**YES**
• Thames Water	10.04.2025	**YES**

Appendix 5: Consultation responses received

Reference:	24/AP/3687
Proposal:	Redevelopment of the site to provide two separate buildings comprising large scale purpose built shared living (LSPBSL) units, conventional residential dwellings, flexible commercial floorspace, accessible parking, children's play space, public realm improvements, landscaping and other associated works.
Location:	79-161 Ilderton Road, London, Southwark SE16 3JZ

Consultation Responses Received

Consultation Responses from Neighbours and Local Groups:

Contributor Address:	Date Received:
• 13 Ilderton Road, South Bermondsey, SE16 3JU	11.01.2025

Appendix 6 - Community Review Panel

Reference:	24/AP/3687
Proposal:	Redevelopment of the site to provide two separate buildings comprising large scale purpose built shared living (LSPBSL) units, conventional residential dwellings, flexible commercial floorspace, accessible parking, children's play space, public realm improvements, landscaping and other associated works.
Location:	79-161 Ilderton Road, London, Southwark SE16 3JZ

Community Review Panel: Feedback from meeting 25 November 2024

Summary

1. The Old Kent Road Community Review Panel has significant concerns about the suitability of the co-living housing proposed for Blocks A and B. While the Panel supports the provision of a range of housing types, it does not think that co-living on this scale is healthy or sustainable. It appeals to both the project team and London Borough of Southwark to reconsider this use on the site. The provision of social rented flats is welcome, but tenure types should not be visibly differentiated.

2. As co-living excludes families, the Panel is concerned that it will not meet the needs of the borough, and will create a transient community that does not integrate or contribute locally. The long-term impact and appeal of this relatively new typology has yet to be tested at such a large scale, and there is a risk of too many developments offering this type of living in the area. The Panel also questions whether single aspect studios are liveable. If a co-living scheme is built, it thinks that a smaller scheme with a mix of studio sizes would be more likely to create a strong, balanced community.

3. The arrival experience for residents needs further work across all blocks. Windows should be designed to maximise privacy, minimise overheating, and be easy to clean. Homes should also provide sufficient storage. The Panel supports the off-site modular construction system, as it has multiple benefits including acoustic performance.

4. The proposed height and massing are acceptable given the wider emerging context, and the reduction in the podium height is successful. The Panel enjoys the detailing of the façades, which draws on the local context. The provision of commercial space is welcome, but independent local businesses should be given priority. The Panel also suggests a community space to encourage social interaction. Proposed planting in the shared amenity spaces and pocket park is positive, but maintenance will be crucial to their success. The Panel emphasises that spaces should be safe and inviting for people of all ages, and at different times of the day.

Co-living

5. The Panel understands the market demand for co-living, generated by the unaffordability of housing in London, and viability pressures on developers. However, it considers co-living to be a symptom of, rather than a solution to, these issues.

6. The amount of development proposed appears to be led by viability considerations. Although it could be a worthwhile experiment on a much smaller scale, the Panel considers the size of this development to be beyond the limits of the current research into the success of the co-living model.

7. By virtue of offering a single-occupancy product, co-living excludes families, creating natural churn and encouraging transient communities that do not integrate or give back to the area.

8. The Panel recognises that this scheme will also provide 40 per cent social rented conventional flats in Blocks C and D, and that co-living will contribute to Southwark's housing targets. However, the majority of those with greatest priority on the housing waiting lists require family accommodation, and co-living will not meet this need.

9. In the Panel's view, people want the opportunity to own their own homes, rather than to rent, and to be able to stay in the area they call home when they find a partner or choose to start a family. If this were affordable, it would help to ensure a stable and long-term community in Old Kent Road, which should be a priority for the Council and the project team.

10. There are concerns that the co-living model has not yet been tested in the long term, and the market could collapse. It is also noted that another co-living scheme and a student housing scheme are coming forward nearby. The Panel questions whether there will be demand for so much of this type of living in the immediate vicinity in years to come.

11. The co-living typology produces buildings with long, narrow corridors and almost exclusively single aspect studios. The Panel acknowledges the provision of well-considered shared amenity spaces, but questions how positive co-living is for resident health and well-being, especially as its impact has not yet been assessed over the long term.

12. It will be challenging to create a cohesive community with 865 co-living studios, and the Panel thinks it is likely to feel more like a hotel. If a co-living scheme is brought forward on this site, the scale should be reconsidered to find a socially optimum size to create a strong community. It may be helpful to explore a flagship co-living scheme, such as Helen & Hard's Vindmøllebakken in Stavanger, Norway, which has 40 studios to ensure that everyone can get to know each other.

13. The Panel would be more comfortable with co-living on a large scale if there were a wider mix of studio sizes. The development should be open to couples as a minimum (and sized appropriately). Although the Panel appreciates the policy

constraints from the Greater London Authority, it thinks that this approach would not only create a less transient community but would also lead to better occupancy levels. If family-sized studios were possible, they should be mixed throughout the blocks rather than located on the same floors.

14. Further work is needed on the programming of the communal spaces and initiatives to help co-living residents to get to know each other. An example is a 'swap and share' clothes borrowing initiative that could help people to meet like-minded residents. These initiatives require good management, but would be in the interest of the co-living operator as they would spread positive publicity about the development.

15. The Panel understands that the language used to describe co-living was not invented by this project team, but is concerned that it is not an accurate framing for the accommodation being provided. This language was originally developed for the co-housing model, which differs from co-living because residents decide on their shared values and take responsibility for governance (rather than having an external operator), creating an invested, long-term community. The Panel recommends taking care when applying the language of co-housing to co-living, to avoid coming across as insincere or being misunderstood.

Quality of residential accommodation

16. Across all tenures, the Panel asks that rental tenants are protected from extreme increases in service charges where possible, as this will help people to remain in the area.

17. Further work is required on the arrival and circulation experience, especially for the co-living blocks. This could be improved with corridors of a more generous width; by checking that the entrances are welcoming; and by making individual front doors identifiable.

18. The Panel also notes that the whole community will be affected by the maintenance standard for shared circulation and entrance spaces. It will therefore be important to set standards that are high enough to create and maintain the feeling of having entered a residence.

19. The Panel welcomes the decision not to use full height glazing, which often leads to residents erecting unsightly privacy screens or frosting. This could still happen on the balconies, particularly on the lower, more exposed levels. The proposal should provide enough privacy to discourage self-adaptations.

20. While the window positions have been carefully designed to ensure compliant overlooking distances, the Panel is concerned that there could still be privacy issues. Views into neighbouring flats should be limited or mitigated against as far as possible. The project team is also asked to specify windows that are easy to clean and maintain - especially important in the UK climate.

21. The internal layouts of all homes would benefit from additional storage space. The project team should consider where residents will be able to keep larger items, such as a vacuum cleaner.

22. The waste strategy is not yet clear, but should avoid creating spaces where residents will feel encased in small, unpleasant-smelling cupboards. Rubbish chutes could offer a solution.

23. It is positive that the off-site modular construction system has multiple benefits, including increased acoustic protection between walls. The Panel notes that this will help promote neighbourly relations and resident well-being. It is also reassuring to hear that the construction system has built-in adaptability in case of changes to the design or unexpected issues on site.

Height and massing

24. The proposal will increase the height and massing of the blocks. However, given the much larger, taller developments nearby that already have planning consent, the Panel understands the strategy of stepping up toward this emerging context.

25. The Panel supports the reduction in height of the podium level, which helps the buildings to appear less bulky and brutalist.

Architecture

26. The Panel is concerned about the clear visual distinction in the external appearance of the socially rented blocks (C and D) compared to the co-living blocks (A and B). This comes across as a divided estate, and could lead to stigmatisation of those living in socially rented homes.

27. The Panel is also concerned that the difference in tenures could become more apparent with time if there are varying standards of maintenance provided by the co-living operators versus the social housing registered providers.

28. The risk that social rented residents feel neglected should be minimised through design for the best chance of creating a cohesive community.

29. The Panel recommends having a unified external appearance across all blocks, especially in terms of colour and materials. There could still be some differences in the elevation detailing to provide variety. This aside, the Panel enjoys the scheme's overall aesthetic, particularly the detailing of aluminium surrounds. It also likes the way lintel and brickwork details have drawn on the local existing context.

Community facilities

30. The provision of ground floor commercial space in a range of sizes is welcomed. This development will introduce a significant amount of people to the area who, combined with the existing population, are likely to have sufficient spending power to support a successful retail offer.

31. The unit intended for a convenience store will be useful to residents. The Panel asks that local businesses are prioritised over the large chain supermarkets that are ubiquitous on high streets.

32. Similarly, the Panel would prefer the other commercial units to be occupied by local independent cafés or shops, rather than national brands.

33. As well as helping residents with cost of living, this will help existing businesses to survive, maintain more of the area's unique identity, and help the development to integrate into the current local community.

34. Community engagement should be carried out to attract local entrepreneurs. The Panel also suggests using these commercial spaces as testbeds to find out what type of tenants will be most successful here. This could be organised as an indoor market with many small businesses – similar to Mercato Metropolitano, but on a smaller scale.

35. To encourage social interaction, the Panel asks for an internal community space in addition to the commercial units; and for further thought on the function or activity programme that would help to build a sense of community.

36. In the Panel's experience, there is a lack of spaces in the immediate vicinity that families can book to host a children's birthday party or similar occasion. A shared laundry facility could also be successful and sociable. The acoustics of the space will need careful consideration.

Amenity and landscaping

37. The Panel asks for a long-term maintenance strategy, clarifying who is responsible for the upkeep of each area. Planting should also be low maintenance, using species that do not easily dry out or become overgrown.

38. The Panel recommends further thinking on how the public pocket park can be designed to be usable and feel safe during the darker winter months.

39. The indoor and outdoor communal spaces should be designed for all ages. This should include activities for teenagers and quieter spaces for adults to enjoy, as well as children's play space.

40. To encourage sustainable and active travel, the bicycle storage facilities should be easy to access and inviting to use.

41. The Panel notes that micromobility transport options, such as e-scooters, are increasingly popular. To avoid circulation spaces becoming cluttered, storage space should be provided for these forms of transport too.

42. While the balance between landscaping and parking is understood, the Panel thinks that the number of Blue Badge spaces will not be sufficient, and asks that one or two more are added if space allows.

Sustainability

43. The project team is asked to design the scheme to be as sustainable as possible, ensuring that the homes will be fit for future living.

44. This should include consideration of internal thermal comfort for residents, and the potential for extreme temperatures. In the Panel's experience, those living in new build developments often suffer from overheating in the summer due to excessive solar gain and inadequate ventilation.

45. The scheme should allow for windows to be openable as far as possible (bearing child safety in mind) to maximise natural ventilation, alongside mechanical ventilation where necessary.

Next steps

46. The Old Kent Road Community Review Panel would welcome the opportunity to review the scheme again if helpful to officers.

Appendix 7 - Heads of Terms for Section 106 Agreement

Reference:	24/AP/3687
Proposal:	Redevelopment of the site to provide two separate buildings comprising large scale purpose built shared living (LSPBSL) units, conventional residential dwellings, flexible commercial floorspace, accessible parking, children's play space, public realm improvements, landscaping and other associated works.
Location:	79-161 Ilderton Road, London, Southwark SE16 3JZ

	Obligation	Mitigation / Terms
1.	**Archaeology**	
	ARCHAEOLOGY: MONITORING CONTRIBUTION	A sum of **£11,171** (RPI All Items index linked) by the developer towards monitoring and providing technical archaeological support during the works on and in the vicinity of the site.
		Applicant's Position: **Agreed.**
2.	**Design: Retention of architectural team**	
	ARCHITECT NOVATION	The ongoing involvement of the original design team (i.e. TP Bennett) shall be secured through the post-permission stages of the design process up to the practical completion of the building.
		Applicant's Position: **Agreed.**
3.	**Environmental**	
	GREENFIELD RUN OFF RATE UNDER-PERFORMANCE OFFSET	Prior to above grade work, the developer is to contribute **£366 for every cubic metre of offset attenuation storage needed** to mitigate any failure to achieve run-off betterment.
		Applicant's Position: **Agreed.**
	HABITAT MANAGEMENT AND MONITORING	Prior to the landscape works being undertaken, the applicant shall submit to and received written approval from the Local Planning Authority of a Habitat Management and Monitoring Plan outlining how retained, created, or enhanced habitats will be maintained and monitored. The applicant shall pay an associated monitoring fee of **£12,874** (index linked).

		Applicant's Position: **Agreed.**
4.	**Housing (conventional Class C3): Viability, affordable units and monitoring**	
	DELIVERY	Provision of 186 Class C3 affordable housing units on the site, comprising the following mix: - 77 x one-bedroom flats (164 habitable rooms) to be social rent tenure; - 79 x two-bedroom flats (263 habitable rooms) to be social rent tenure; - 30 x three-bedroom flats (150 habitable rooms) to be social rent tenure. The Agreement shall specify: - income thresholds for the affordable tenures; and - eligibility criteria for the affordable tenures. Occupancy of the PBCL units shall be subject to staged restrictions to ensure early delivery of affordable housing units.
		Applicant's Position: **Agreed.**
	EARLY STAGE REVIEW	An Early Stage Review Mechanism is to be triggered if substantial implementation has not occurred within 30 months of planning permission being granted. The Council may appoint external consultants to assess any of the developer/owner's Early Stage Review viability information, the costs of which shall be payable by the owner/developer. If the Early Stage Review concludes that additional affordable housing can viably be provided, because there is no surplus conventional housing within the proposed development that could be converted from market/intermediate tenure into social rent, the owner/developer shall make a financial payment (an "Affordable Housing Contribution") to the Council. Occupancy of the PBCL shall be restricted until the Additional Affordable Housing Scheme has been approved by the Council.
		Applicant's Position: **Agreed.**
	TRANSFERRAL TO A REGISTERED PROVIDER	Within six months of the implementation date of the South Building, the developer is to submit to the Council the name of the chosen Registered Provider. The affordable housing units are, upon their completion, to be handed over to the Registered Provider.

		Applicant's Position: **Agreed.**
	SERVICE CHARGES	The service charge for the social rent housing units shall be: - determined in accordance with the 'Direction for Rent Standard'; and - limited to costs which: reasonably relate to the relevant Affordable Housing Unit; and have been reasonably incurred by the Owner.
		Applicant's Position: **Agreed.**
	MONITORING: REPORTING	Completion and submission to the Council of the Housing Delivery Monitoring Table at the following intervals: - within 10 working days of commencement of the Development; - on or before first occupation of the development; - within the 10 working days after any amendments have been made to the planning permission; - limited to costs which: reasonably relate to the relevant Affordable Housing Unit; and have been reasonably incurred by the Owner.
		Applicant's Position: **Agreed.**
	MONITORING: CONTRIBUTION	Contribution of **£24,645** (RPI All Items index linked), based on 186 dwellings at £132.50 per dwelling, towards the Council's costs for monitoring affordable housing delivery. Developer is to complete the Council's Housing Delivery Monitoring Tables at approval, commencement, completion and any amendment stages. Developer is to the complete the Affordable Housing Survey, and support it with evidence as necessary, within 28 days of receiving the survey from the Council.
		Applicant's Position: **Agreed.**
5.	**Housing (PBCL): Tenancies, management and other restrictions**	
	FINAL OPERATIONAL MANAGEMENT PLAN	Prior to occupation of the PBCL, a Final Operational Management Plan shall be submitted to and approved by the Local Planning Authority. It shall be based on the principles established by the application-stage Operational Management Plan, but with appropriate updates, and shall include (but not be limited to) the following details: - security and fire safety procedures;

		- how all internal areas of the development will be maintained; - the day to day operation of the PBCL to ensure noise and disturbance is minimised during the day- and night-time (including codes of behaviour / conduct and other protocols for managing breaches of acceptable behaviour); - the logistics and coordination of the move-in and move-out arrangements to minimise disruption to the public highway (and shall include specified management measures in respect of the move-in period, including coordination of arrangements with nearby PBSA developments in the area so as to avoid overload at peak times); and - how communal spaces and private units will be cleaned and how linen changing services will operate. The approved Final Operational Management Plan (as amended from time to time) shall be complied with throughout the lifetime of the development. The Final Operational Management Plan shall be eligible for amendments from time-to-time, subject in each instance to the Local Planning Authority's approval.
		Applicant's Position: **Agreed.**
	RETENTION AND SINGLE MANAGEMENT OF PBCL PREMISES	The PBCL premises (the units and all shared and ancillary facilities), shall be retained as a rental product which cannot be sold off as individual units, nor at any time be used as self-contained accommodation (hotel, aparthotel, hostel or similar). All communal amenity facilities (internal and external) within the PBCL premises as approved shall be retained for the lifetime of the development, and shall not be used for any purpose other than communal amenity space for all PBCL residents. The communal amenity facilities shall be free-to-access, except where agreed in writing by the Local Planning Authority. The PBCL premises shall be at all times managed by a single management company (accepting that the North Building can be demised into two self-contained policy-compliant PBCL premises, Block A and Block B, and could have two separate management companies).
		Applicant's Position: **Agreed.**
6.	**Housing (conventional Class C3): Occupier facilities**	

<table>
<tr><td>WHEELCHAIR HOUSING DELIVERY</td><td>Provision of 18 Wheelchair Accessible housing units in accordance with the table below.
<table>
<tr><th>Block</th><th>Level</th><th>Ref. no.</th><th>Tenure</th><th>Spec</th><th>Occup’y</th></tr>
<tr><td rowspan="18">D</td><td rowspan="2">01</td><td>2E UA</td><td>S. Rent</td><td>M4[3][2][a]</td><td>2B4P</td></tr>
<tr><td>1D UA</td><td>S. Rent</td><td>M4[3][2][a]</td><td>1B2P</td></tr>
<tr><td rowspan="2">02</td><td>2E UA</td><td>S. Rent</td><td>M4[3][2][a]</td><td>2B4P</td></tr>
<tr><td>1D UA</td><td>S. Rent</td><td>M4[3][2][a]</td><td>1B2P</td></tr>
<tr><td rowspan="2">03</td><td>2E UA</td><td>S. Rent</td><td>M4[3][2][a]</td><td>2B4P</td></tr>
<tr><td>1D UA</td><td>S. Rent</td><td>M4[3][2][a]</td><td>1B2P</td></tr>
<tr><td rowspan="2">04</td><td>2E UA</td><td>S. Rent</td><td>M4[3][2][a]</td><td>2B4P</td></tr>
<tr><td>1D UA</td><td>S. Rent</td><td>M4[3][2][a]</td><td>1B2P</td></tr>
<tr><td rowspan="2">05</td><td>2E UA</td><td>S. Rent</td><td>M4[3][2][a]</td><td>2B4P</td></tr>
<tr><td>1D UA</td><td>S. Rent</td><td>M4[3][2][a]</td><td>1B2P</td></tr>
<tr><td>06</td><td>2E UA</td><td>S. Rent</td><td>M4[3][2][a]</td><td>2B4P</td></tr>
<tr><td></td><td>1D UA</td><td>S. Rent</td><td>M4[3][2][a]</td><td>1B2P</td></tr>
<tr><td>07</td><td>2E UA</td><td>S. Rent</td><td>M4[3][2][a]</td><td>2B4P</td></tr>
<tr><td></td><td>1D UA</td><td>S. Rent</td><td>M4[3][2][a]</td><td>1B2P</td></tr>
<tr><td>08</td><td>2E UA</td><td>S. Rent</td><td>M4[3][2][a]</td><td>2B4P</td></tr>
<tr><td></td><td>1D UA</td><td>S. Rent</td><td>M4[3][2][a]</td><td>1B2P</td></tr>
<tr><td>09</td><td>2E UA</td><td>S. Rent</td><td>M4[3][2][a]</td><td>2B4P</td></tr>
<tr><td></td><td>1D UA</td><td>S. Rent</td><td>M4[3][2][a]</td><td>1B2P</td></tr>
</table>
Applicant’s Position: Agreed.</td></tr>
<tr><td>CHILDREN’S PLAY SPACE: IN-LIEU PAYMENT</td><td>Within six months of the implementation date of the South Building, the developer is to pay £52,865.10 (BCIS index linked), based on 350.1 square metres of play space not provided on site, at a rate of £151 per square metre of shortfall</td></tr>
<tr><td></td><td>Applicant’s Position: Agreed.</td></tr>
<tr><td></td><td>Within six months of the implementation date of the South Building, the developer is to pay £96,719.00 (BCIS index linked), based on 471.8 square metres of external amenity</td></tr>
</table>

	EXTERNAL AMENITY SPACE: IN-LIEU PAYMENT	space not provided on site, at a rate of £205 per square metre of shortfall. Applicant's Position: **Agreed.**
	COMMUNAL AMENITY SPACE AND CHILDREN'S PLAY SPACE: DELIVERY	Prior to occupation of any of the Class C3 housing units, the children's play space and the communal amenity space shall be completed and available for use. Applicant's Position: **Agreed.**
	COMMUNAL AMENITY SPACE AND CHILDREN'S PLAY SPACE: MANAGEMENT STRATEGY	Prior to occupation of any of the Class C3 housing units, the developer is to submit a Communal Amenity Space and Children's Play Space Management Strategy which shall include: - a strategy for providing, maintaining and cleaning the outdoor communal amenity space and the children's play space; - the access arrangements; - the hours of opening, which shall be (except during temporary maintenance work): between 06:30 and 22:30 on all days of the week 365 days a year except during temporary maintenance work; - a strategy to ensure all residents of the development have the ability to access the children's play space podium (i.e. level 1), irrespective of the block in which their dwelling in located, in a fair and equitable way; - a methodology to ensure the outdoor communal amenity space and children's play space is provided free of charge to all residents of the development except for the payment of a reasonable service charge. Applicant's Position: **Agreed.**
7.	**Housing (PBCL): Occupier facilities**	
	WHEELCHAIR PBCL UNITS DELIVERY	Provision of 86 wheelchair PBCL units, in accordance with the table below:

Block	Level(s)	Ref. no.	Total no.
A	03 to 27	UA Unit 01 (north side)	25
	03 to 27	UA Unit 01 (park side)	22
B	02	UA Unit 02	1
	03 to 21	UA Unit 02 (north side)	19

			03 to 21	UA Unit 02 (park side)	19
		Applicant's Position: **Agreed.**			
	WHEELCHAIR PBCL UNITS MARKETING	Suitable marketing of the PBCL wheelchair units shall be carried out for the requisite period before the units can be released to non-disabled prospective residents.			
		Applicant's Position: **Agreed.**			
8.	**Local economy: Employment and training**				
	CONSTRUCTION PHASE JOBS/ CONTRIBUTIONS	The development must: - deliver **107 sustained jobs** to unemployed Southwark residents; - deliver **107 short courses**; and - support **26 construction industry apprentices** during the construction phase. Or make the pro-rata Employment and Training Contribution which, at maximum, would be **£515,150** (RPI All Items index linked). This breaks down as: - **£460,100** against sustained jobs; - **£16.050** against short courses; and - **£39,000** against construction industry apprenticeships.			
		Applicant's Position: **Agreed.**			
	CONSTRUCTION PHASE EMPLOYMENT, SKILLS AND BUSINESS PLAN	The Plan would be expected to detail: - methodology of training, skills, support etc.; - targets for construction skills and employment outputs; - methodology for delivering apprenticeships; and - local supply chain activity methodology.			
		Applicant's Position: **Agreed.**			
	LOCAL PROCUREMENT	The applicant shall use reasonable endeavours to allow local businesses to tender for the procurement of goods and services generated by the development both during and after construction.			
		Applicant's Position: **Agreed.**			
	LONDON LIVING WAGE	The developer shall use reasonable endeavours to pay those who work on site (except in relation to volunteers, apprentices and interns) no less than the LLW.			

		Applicant's Position: **Agreed.**
9.	**Local economy: Marketing of Building D commercial premises**	
	RETAILER TARGETED MARKETING	The ground floor commercial unit within Block D shall be marketed only at retailers (Class E [a] uses) for a period of at least six months ending no earlier than the date of practical completion.
		Applicant's Position: **Agreed.**
10.	**Local economy: Commercial unit use class restrictions**	
	RESTRICTION ON HOT FOOD TAKEAWAYS, BETTING SHOPS, PAWN BROKERS AND PAY DAY LOAN SHOPS	None of the three commercial units shall, notwithstanding any changes to the use classes order or alterations/ revocations to the Article 4 Direction that applies in this location, be used as a hot food takeaway, betting shop, pawn broker or pay day loan shop.
		Applicant's Position**: Agreed**
11.	**Landscape and public realm: Publicly-accessible on-site open space**	
	LONG-TERM MANAGEMENT	No part of the development shall be occupied until the developer has submitted to and received approval from the Council of an Estate Management Plan relating to all PaOS within the site. The Estate Management Plan shall: - detail the maintenance, cleaning and renewal arrangements of the PaOS in relation to • all sustainable (SuDS) infrastructure (to include access and maintenance information); • soft and hard finishes; • furniture; and • lighting; - set out a methodology to ensure the PaOS is kept free from obstruction as far as is practical during any maintenance and cleaning of all buildings and structures within/around the development, with details of how any unavoidable disruption/ obstruction will be minimised in impact and duration; - demonstrate accordance with the Public London Charter LPG; and - include the name of the person(s)/company responsible for ensuring the effective provision of the PaOS as public realm in the long term, along with indicative running costs and service charge.

		Applicant's Position: **Agreed.**
	HOURS OF ACCESS	The PaOS shall be open to the general public every day of the week including Bank Holidays (with the exception of the rights of closure detailed below). The opening hours shall, as minimum, be 07:00 to 21:00.
		Applicant's Position: **Agreed.**
	RIGHTS OF CLOSURE	The developer shall be entitled to close the PaOS (with prior notification to members of the public) for up to one day per year so as to prevent public rights of way being obtained.
		Applicant's Position: **Agreed.**
12.	**Landscape and public realm: Off-site open space and trees**	
	NEW ILDERTON ROAD PARK MAINTENANCE CONTRIBUTION	Prior to first occupation of any part of the development, the developer is to contribute **£25,000.00** (index linked from September 2024) towards the costs of maintaining the New Ilderton Road Park (also known as Pat Hickson Park), required because of the increased use of the park by occupiers of the development. Usage by the Council's Parks Team of the monies will be permitted only once the five-year period following first opening of the park has elapsed (Network Rail is covering the maintenance costs during the initial five-year period).
		Applicant's Position: **Agreed.**
	PUBLIC OPEN SPACE: IN-LIEU PAYMENT	Within six months of the implementation date of any part of the development, the developer is to pay a contribution of **£339,480** (BCIS index linked) to mitigate the failure to deliver all of the public open space requirement arising from the conventional (Class C3) and PBCL housing elements of the proposal.
		Applicant's Position: **Agreed.**
	TREE LOSS PAYMENT	In the event that any of the 39 proposed trees cannot be delivered, the developer is to pay to a sum (subject to CAVAT indexation) per undelivered tree according to the stem girth and species of the tree.
		Applicant's Position: **Agreed.**
13.	**Previous permission**	

	INOPERATION OF EXTANT PLANNING PERMISSION	Covenant requiring the owner to 'give up' the right to develop under the existing planning permission (ref. 23/AP/0387). Applicant's Position: **Agreed.**
14.	**Transport: Construction phase mitigation**	
	CONSTRUCTION MANAGEMENT AND MONITORING	Prior to commencement, the developer is to contribute **£19,000.00** (RPI All Items index linked), based on £40 per C3 residential unit and £40 for every three PBCL unit, to cover the cost incurred by the Council's Highways Network Management division in providing the following services: - monitoring the construction-related activities associated with the development; - monitoring the cumulative impacts of those activities on the surrounding highways and local environment, together with the other construction activities on nearby sites; and - ensuring compliance with the approved CEMP throughout the duration of the build programme. Applicant's Position: **Agreed.**
15.	**Transport: Development mitigation**	
	ACTIVE TRAVEL IMPROVEMENTS CONTRIBUTION	Within six months of the implementation date of any part of the development, the developer is to contribute **£100,000.00** (index linked from September 2024) for use by the Council and TfL in improving pedestrian and cyclist experience and infrastructure in the vicinity of the site, in accordance with Active Travel policies. The works shall specifically relate to improving the pedestrian and cyclist experience on John Berylson Way on the approach to the junction with Ilderton Road. Applicant's Position: **Agreed.**
	BUS SERVICES CONTRIBUTION	Within six months of the implementation date of any part of the development, the developer is to contribute **£1,282,500.00** (BCIS index linked from 2019) towards TfL bus service improvements, and any necessary associated transport and public realm improvements, in the vicinity of the site. Applicant's Position: **Agreed.**
		Prior to occupation of any of the conventional Class C3 housing units, a contract shall be entered into with a Car Club Operator

CAR CLUB MEMBERSHIP	that secures membership per eligible adult per Class C3 dwelling within the development (minimum duration of the membership is to be 3 years).
	Applicant's Position: **Agreed.**
CAR FREE MARKETING	The building owner shall market all of the for sale and rental properties hereby consented using materials that clearly identify the development as car free (excluding the permitted designated Blue Badge spaces).
	Applicant's Position: **Agreed.**
DELIVERY AND SERVICING MANAGEMENT PLAN	Before the first occupation of any part of the development hereby approved, a Final Delivery and Servicing Management Plan (DSP) shall be submitted to and approved in writing by the Local Planning Authority. It shall: - detail how all parts of the site are to be serviced shall be submitted to; and - be based on the principles set out in the Draft Delivery and Servicing Management Plan submitted as part of the planning application.
	Applicant's Position: **Agreed.**
DELIVERY AND SERVICING MONITORING PLAN	Prior to occupation of any part of the development, a Delivery and Servicing Monitoring Plan is to be submitted to and approved by the Council. The Delivery and Servicing Monitoring Plan shall set out the method for monitoring and recording the number of servicing and delivery trips to and from the development.
	Applicant's Position: **Agreed.**
DELIVERY AND SERVICING MANAGEMENT BOND	Prior to occupation of any part of the development, a Delivery and Servicing Bond is to be paid to the Council. The bond will be **£49,100.00**, comprising: - a cash deposit of **£47,500.00** (RPI All Items index linked), calculated on the basis of £100 per Class C3 dwelling and £100 per three PBCL bedspaces; - a monitoring fee of **£1,600.00** to cover the Council's costs of assessing the quarterly monitoring. For a period of two years from opening of the PBCL element of the proposed development, the daily vehicular servicing activity of the site is to be monitored (in accordance with the approved Delivery and Servicing Monitoring Plan) and returns made on a

	quarterly basis. If the site meets or betters its own baseline target the Delivery and Servicing Management Cash Deposit will be returned to the developer within 6 months of the end of the monitoring period. If the site fails to meet its own baseline the cash deposit will be made available for the Council to utilise for sustainable transport and highways remediation projects in the ward of the development. Irrespective of whether the development meets or fails to meets is baseline target, the Council will retain the monitoring fee.
	Applicant's Position: **Agreed.**
EVCP PROVISION	The two Blue Badge bays in the North Building car park shall be able to access active Electric Vehicle Charging Points (EVCPs), and they shall be operational from the first occupation of the North Building. The one proposed bay adjacent to John Berylson Way shall be able to access an active Electric Vehicle Charging Point (EVCP), and it shall be operational from the first occupation of the South Building. The EVCPs shall be retained in full working order thereafter for the lifetime of the development.
	Applicant's Position: **Agreed.**
ACCESSIBLE CAR CLUB VEHICLE	Six months prior to occupation of any part of the development, the developer is to contribute no more than **£20,000** (index linked) towards the Car Club operator's costs of equipping the accessible Car Club Bay with a specialised accessible vehicle.
	Applicant's Position: **Agreed.**
PARKING PERMIT ELIGIBILITY EXCLUSION	None of the PBCL occupants, Class C3 housing occupants and tenants of the commercial space at the development shall be eligible for parking permits within any existing or proposed CPZ in the Borough.
	Applicant's Position: **Agreed.**
PBCL PROVISION OF FREE-OF-CHARGE CYCLE LOCKERS LONG-TERM	Prior to occupation of the PBCL, the 60 pre-loaded folding cycle lockers (45 in Block A, 15 in Block B) shall be installed and available for use, and thereafter for the lifetime of the PBCL the cycles shall remain free-of-charge and for the exclusive use of residents staying in the PBCL accommodation.
	Applicant's Position: **Agreed.**

PBCL WASTE MANAGEMENT	For the lifetime of the PBCL premises, the owner shall ensure that a contract is in place with a commercial provider of refuse/recycling collection services.
	Applicant's Position: **Agreed.**
TfL CYCLE HIRE DOCKING STATION CONTRIBUTION	Prior to implementation (or a deferred trigger point, subject to TfL's agreement), the developer is to contribute **£23,716.66** (BCIS index linked) towards expansion of one or more TfL cycle docking stations in the vicinity of the site.
	Applicant's Position: **Agreed.**
TfL LEGIBLE LONDON SIGNAGE	Prior to implementation (or a deferred trigger point, subject to TfL's agreement), the developer is to contribute **£32,000** (BCIS index linked) towards provision of new Legible London signage and/or and to enhance existing Legible London signage on the site and/or within the vicinity.
	Applicant's Position: **Agreed.**
TRAVEL PLAN AND ASSOCIATED MONITORING	Before the first occupation of any part of the development, a Final Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The Travel Plan shall set out the measures to be taken to encourage the use of modes of transport other Than the car by all users of the building, and shall give particular focus to active travel measures. The Final Travel Plan shall be based on the principles set out in the Draft Travel Plan. At the start of the second year of operation of the approved Final Travel Plan, a detailed Transport Methods Survey shall be submitted to and approved in writing by the Local Planning Authority. It shall show - the methods of transport used by all those users of the development to and from the site; - how those results compares with the methods envisaged in the Final Travel Plan; and - any additional measures to be taken to encourage the use of public transport, walking and cycling to the site. Before the first occupation of any part of the development, the developer is to contribute **£2,790.00** (index linked) for the purposes of monitoring of the Final Travel Plan and Transport Methods Survey.
	Applicant's Position: **Agreed.**

16.	**Transport: Highway impacts mitigation**	
	BOROUGH ROAD NETWORK: SCOPE OF S278 WORKS	Prior to above grade works, the developer is to submit the Section 278 Highway Works Specification, detailed design and estimated costs to the Local Planning Authority (who shall liaise with the Highways Authority) and receive its approval in writing. This Specification, detailed design and estimated costs shall comprise the following parcels of works, and all shall be constructed in accordance with SSDM standards: − construct a new raised table on Ilderton Road / a raised entry treatment at the junction of Ilderton Road with Rollins Road; − repave the footway including new kerbing on Ilderton Road and John Berylson Way; − deliver two fully inset loading bays on the eastern side of Ilderton Road; − construct a bus stop and shelter (the design of which shall be approved by TfL and the Council) on Ilderton Road; − deliver a car club bay on Verney Way (or an agreed alternative location in liaison with the Council's Highways Development Management division and the Council's Parking Team); − construct a vehicle crossover on Ilderton Road and a vehicle crossover on John Berylson Way − reinstate the redundant vehicle crossover on Ilderton Road as footway; − provide any drainage works and such other ancillary works as may be reasonably required to facilitate the development; − promote all necessary Traffic Management Orders (TMOs) to create/amend waiting/loading restrictions in respect of the two proposed inset loading bays and upgrading the existing waiting restrictions along Ilderton Road between the John Berylson Way junction and the Delaford Road junction, to include double yellow lines 'with blips' along Ilderton Road; − install dropped kerbs where required to assist with refuse collection activities, and refresh road markings where necessary following kerb installation; − repair any damage to the highway (including any inspection covers and street furniture) due to construction activities connected with the development including construction work and the movement of construction vehicles;

		− upgrade street lighting fronting the development on Ilderton Road and John Berylson Way
		Applicant's Position: **Agreed.**
	BOROUGH ROAD NETWORK: S278 AGREEMENT DEADLINE	Prior to commencement of the agreed highway works, the developer is to enter into a Highway Agreement under Section 278 (and Section 38).
		Applicant's Position: **Agreed.**
	BOROUGH ROAD NETWORK: S278 DETAILED DESIGN	Prior to commencement of piling, an Approval in Principle (AiP), relating specifically to the basement element of the proposed development, shall be submitted to and received approval from the Local Planning Authority (who shall liaise with Council's Highways Structures Team).
		Applicant's Position: **Agreed.**
17.	**Sustainability**	
	FUTURE-PROOFED CONNECTION TO DISTRICT HEAT NETWORK	Prior to occupation, a DHN Energy Strategy must be approved setting out how the development (with the exception of the three commercial units) will be designed and built so that all parts of it will be capable of connecting to any future DHN.
		Applicant's Position: **Agreed.**
	CARBON OFFSET PAYMENT 1	Prior to implementation, with the exception of any site clearance/demolition and archaeological investigative works, the developer shall: - submit to and receive approval in writing from the Local Planning Authority of a Pre-Commencement Energy Statement Update to determine if any alternative and/or additional energy performance measures can be incorporated into the development to improve the Carbon Targets; - pay an off-site contribution of 50% of the total application stage predicted site-wide regulated carbon shortfall (104.5 tonnes/CO2). This equates to 52.25 tonnes/CO2. Calculated applying the Council's current tariff rate of £95/tonne for 30 years, this is **£297,932** (RPI All Items index linked).
		Applicant's Position: **Agreed.**

CARBON OFFSET PAYMENT 2	Prior to occupation of the development, the owner shall submit to and receive approval in writing from the Local Planning Authority of a Pre-Occupation Energy Review. The Pre-Occupation Energy Review shall demonstrate how the development will achieve the Agreed Carbon Targets in accordance with the principles contained in the Application Stage Energy Statement (and/or the Pre-Commencement Energy Statement Update). In the event that the Pre-Occupation Energy Review demonstrates the application stage predicted savings have been met or exceeded, the applicant shall pay the Carbon Green Fund Contribution 2 (thereby fully offsetting the differential between on-site as-built carbon savings and net zero). The sum shall be calculated applying the Council's carbon offset tariff in place at that time. Only following receipt of the Carbon Green Fund Contribution 2 will the Council issue its approval in writing. In the event that the Pre-Occupation Energy Review demonstrates the as-built scheme falls short of the previously predicted savings, the applicant shall accompany their submission with an Energy Strategy Addendum setting out additional energy efficiency proposals to achieve the Agreed Carbon Targets. If the Council agrees to the proposed additional measures, the owner shall implement all of the measures within six months of the Council's approval of the Addendum. If the Council and owner cannot come to an agreement on the proposed additional measures, the owner shall pay a further carbon offset contribution (to be calculated applying the Council's carbon offset tariff in place at that time) within 28 days of the Council issuing their request. The Pre-Occupation Energy Review shall be complied with in completing and occupying the development.
	Applicant's Position: **Agreed.**
BE SEEN MONITORING	Prior to implementation of the development, the owner shall submit to the GLA and the Council accurate and verified estimates of the 'Be Seen' energy performance indicators. Within a set timeframe from occupation of the development the owner shall provide to the GLA and the Council updated accurate and verified estimates of the 'Be Seen' energy performance indicators. On the first anniversary of occupation or following the end of the Defects Liability Period (whichever is the later) and at least for the following three/four years after that date, the Owner shall

		submit to the GLA accurate and verified annual in-use energy performance data for all relevant indicators. In the event that the 'in-use stage' evidence shows that the 'as-built stage' performance estimates have not been or are not being met, the owner shall identify the causes of underperformance and the potential mitigation measures. The owner shall submit to the GLA and the Council a Be Seen Mitigation Measures Plan comprising of measures that are reasonably practicable to implement, along with a proposed timescale for implementation. The measures shall be implemented in accordance with the approved Be Seen Mitigation Measures Plan.
		Applicant's Position: **Agreed.**
18.	**Administration**	
	Monitoring	Payment to cover the costs of monitoring these necessary planning obligations (with the exception of those that have monitoring contributions already factored-in), calculated as 2% of total sum but with reasonable cap applied).
		Applicant's Position: **Agreed.**

OPEN **MUNICIPAL YEAR 2024-25**

COMMITTEE: **PLANNING COMMITTEE (MAJOR APPLICATIONS) B**

NOTE: Original held in Constitutional Team; all amendments/queries to Gregory Weaver, Constitutional Team, Tel: 020 7525 3667

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