

Planning Committee (Smaller Applications)

Wednesday 22 July 2026

7.00 pm

Ground floor meeting rooms (G01 A B & C)
160 Tooley Street, London SE1 2QH

Membership

Councillor Richard Taylor (Chair)
Councillor Jane Salmon (Vice-Chair)
Councillor Andy Higson
Councillor Sean Hannigan
Councillor James Moyse
Councillor Margy Newens
Councillor Kath Whittam

Reserves

Councillor Ryan Cox
Councillor Catherine Dawkins
Councillor Sam Dalton
Councillor Victoria Mills
Councillor Pascale Mitchell
Councillor David Noakes
Councillor Leigh Richman

INFORMATION FOR MEMBERS OF THE PUBLIC

Access to information

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

Babysitting/Carers allowances

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

Access

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

Contact

Beverley Olamijulo on 020 7525 7234 or email: beverley.olamijulo@southwark.gov.uk

Members of the committee are summoned to attend this meeting

Althea Loderick

Chief Executive

Date: 14 July 2026



Planning Committee (Smaller Applications)

Wednesday 22 July 2026

7.00 pm

Ground floor meeting rooms (G01) 160 Tooley Street, London SE1 2QH

Order of Business

Item No.	Title	Page No.
1.	APOLOGIES	
	To receive any apologies for absence.	
2.	CONFIRMATION OF VOTING MEMBERS	
	A representative of each political group will confirm the voting members of the committee.	
3.	NOTIFICATION OF ANY ITEMS OF BUSINESS WHICH THE CHAIR DEEMS URGENT	
	In special circumstances, an item of business may be added to an agenda within five clear days of the meeting.	
4.	DISCLOSURE OF INTERESTS AND DISPENSATIONS	
	Members to declare any personal interests and dispensation in respect of any item of business to be considered at this meeting.	
5.	MINUTES	1 - 5
	To approve as a correct record the minutes of the meeting held on 30 June 2026.	
6.	DEVELOPMENT MANAGEMENT	6 - 10
6.1.	56-60 COMBER GROVE, CAMBERWELL LONDON SE5 0LQ	11 - 113

Item No.	Title	Page No.
6.2.	ALLEYN'S SCHOOL TOWNLEY ROAD, LONDON SOUTHWARK SE22 8SU	114 - 138

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

EXCLUSION OF PRESS AND PUBLIC

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

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

Date: 14 July 2026



Planning Committee (Smaller Applications)

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

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

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

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

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

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

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

Please note:

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

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

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

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



Planning Committee (Smaller Applications)

MINUTES of the Planning Committee (Smaller Applications) held on Tuesday 30 June 2026 at 7.00 pm at the Ground floor meeting rooms (G01 A B & C) 160 Tooley Street, London SE1 2QH

PRESENT:	Councillor Richard Taylor (Chair) Councillor Jane Salmon (Vice-chair) Councillor Andy Higson Councillor Sean Hannigan Councillor James Moyse Councillor Kath Whittam Councillor Leigh Richman (reserve member)
OTHER MEMBERS PRESENT:	Councillor Eloise Waldon-Day (ward member) Councillor George Grime (ward member) Councillor Janice White (ward member)
OFFICER SUPPORT:	Dennis Sangweme (Assistant Director, Development Management) Kamil Dolebski (Head of Legal and Planning Property) Sean Gomes (Development Management) Abbie McGovern (Development Management) Beverley Olamijulo (Constitutional Officer)

1. APOLOGIES

Apologies for absence was received from Councillor Margy Newens.

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

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

- Addendum report relating to items 6.1 and 6.2 – Development management items
- Members pack.

4. **DISCLOSURE OF INTERESTS AND DISPENSATIONS**

None were disclosed.

5. **MINUTES**

RESOLVED:

That the minutes for the Planning Committee (Smaller Applications) meeting held on 24 February 2026 be approved as a correct record and signed by the chair.

6. **DEVELOPMENT MANAGEMENT**

Members noted the development management report.

RESOLVED:

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

6.1 **ALLEYNS SCHOOL TOWNLEY ROAD LONDON SE22 8SU**

Planning application reference 26/AP/0519

Report: See pages 11 to 60 of the agenda pack and addendum pages 1 to 2.

PROPOSAL

Demolition of and replacement of school dining hall with a new school building and associated landscaping works.

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

committee asked questions of the officers.

The objectors' spokesperson was present to address the committee and responded to questions from members.

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

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

Councillor George Grime addressed the committee in his capacity as a ward member and responded to questions from members of the committee.

Members further debated on the application.

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

RESOLVED:

1. That planning permission be granted subject to the conditions and amended conditions set out in the report and addendum report and the completion of a Section 106 legal agreement.
2. In the event that paragraph 1 above is not met by 30 September 2026, the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 94 of the report.

At 8.05pm the meeting adjourned for a ten-minute comfort break. The meeting reconvened at 8.15pm to proceed to the next item on the agenda.

6.2 67A UPLAND ROAD SOUTHWARK SE22 0DA

Planning application reference 26/AP/0344

Report: See pages 61 to 85 of the agenda pack and pages 2 to 4 of the addendum report.

PROPOSAL

Demolition of the existing garage. Constructing of two-storey building to provide ancillary accommodation to the host dwellinghouse (to the rear) at No. 67C Upland Road (aka 'Niwa House').

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

committee asked questions of the officers.

The objector present addressed the committee. and responded to questions from members.

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

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

Councillor Janice White addressed the committee in her capacity as a ward member and responded to questions from members of the committee.

The planning and legal officers responded to additional questions from members of the committee.

The ward member responded to further questions put by members of the committee.

Motion to exclude Press and Public

At 9.15 pm, a motion to exclude the press and public was moved, seconded, put to the vote and declared carried.

RESOLVED: That the press and public be excluded from the meeting during consideration of the following item(s) on the grounds that exempt information would be disclosed, as defined in Article 10 of the Council's Constitution.

Note:

The exempt information relates to matters protected by legal professional privilege.

At 9.45pm the committee resumed to the open session of the meeting.

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

RESOLVED:

1. That planning permission be granted subject to conditions set out in the report, amended conditions set out in the addendum report and the applicant completing a unilateral undertaking.
2. That consideration of the application includes further discussion with members regarding the legal principles underpinning ancillary use and the basis upon which the officer recommendation had been reached, as

identified in paragraphs 21 - 23 of the report.

The meeting ended at 10.15 pm

CHAIR:

DATED:

Agenda Item 6.

Meeting Name:	Planning Committee (Smaller Applications)
Date:	22 July 2026
Report title:	Development Management
Ward(s) or groups affected:	All
Classification:	Open
Reason for lateness (if applicable):	Not applicable
From:	Proper Constitutional Officer

RECOMMENDATIONS

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

BACKGROUND INFORMATION

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

KEY ISSUES FOR CONSIDERATION

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

- b. To give observations on applications in respect of which the council is not the planning authority in planning matters but which relate to site(s) within the borough, or where the site(s) is outside the borough but may affect the amenity of residents within the borough.
 - c. To receive for information any reports on the previous determination of applications, current activities on site, or other information relating to specific planning applications requested by members.
6. Each of the following items are preceded by a map showing the location of the land/property to which the report relates. Following the report, there is a draft decision notice detailing the officer's recommendation indicating approval or refusal. Where a refusal is recommended the draft decision notice will detail the reasons for such refusal.
 7. Applicants have the right to appeal to Planning Inspector against a refusal of planning permission and against any condition imposed as part of permission. Costs are incurred in presenting the council's case at appeal which maybe substantial if the matter is dealt with at a public inquiry.
 8. The sanctioning of enforcement action can also involve costs such as process serving, court costs and of legal representation.
 9. Where either party is felt to have acted unreasonably in an appeal the inspector can make an award of costs against the offending party.

Community impact statement

10. Community impact considerations are contained within each item.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Director of Law and Governance

11. A resolution to grant planning permission shall mean that the director of planning and growth is authorised to grant planning permission. The resolution does not itself constitute the permission and only the formal document authorised by the committee and issued under the signature of the director of planning and growth shall constitute a planning permission. Any additional conditions required by the committee will be recorded in the minutes and the final planning permission issued will reflect the requirements of the planning committee.
12. A resolution to grant planning permission subject to legal agreement shall mean that the director of planning and growth is authorised to issue a planning permission subject to the applicant and any other necessary party entering into a

written agreement in a form of words prepared by the director of law and governance, 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 director of law and governance. The planning permission will not be issued unless such an agreement is completed.

13. Section 70 of the Town and Country Planning Act 1990 as amended requires the council to have regard to the provisions of the development plan, so far as material to the application, and to any other material considerations when dealing with applications for planning permission.
14. Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that where, in making any determination under the planning Acts, regard is to be had to the development plan, the determination shall be made in accordance with the plan unless material considerations indicate otherwise. The development plan is currently the Southwark Plan which was adopted by the council in February 2022. The Southwark Plan 2022 was adopted after the London Plan in 2021. For the purpose of decision-making, the policies of the London Plan 2021 should not be considered out of date simply because they were adopted before the Southwark Plan 2022. London Plan policies should be given weight according to the degree of consistency with the Southwark Plan 2022.
15. The National Planning Policy Framework (NPPF), as amended in December 2024, is a relevant material consideration and should be taken into account in any decision-making.
16. Section 143 of the Localism Act 2011 provides that local finance considerations (such as government grants and other financial assistance such as New Homes Bonus) and monies received through CIL (including the Mayoral CIL) are a material consideration to be taken into account in the determination of planning applications in England. However, the weight to be attached to such matters remains a matter for the decision-maker.
17. "Regulation 122 of the Community Infrastructure Levy regulations (CIL) 2010 as amended, provides that "a planning obligation may only constitute a reason for granting planning permission if the obligation is:
 - a. necessary to make the development acceptable in planning terms;
 - b. directly related to the development; and
 - c. fairly and reasonably related to the scale and kind to the development.

A planning obligation may only constitute a reason for granting planning permission if it complies with the above statutory tests."

18. The obligation must also be such as a reasonable planning authority, duly appreciating its statutory duties can properly impose i.e. it must not be so unreasonable that no reasonable authority could have imposed it. Before resolving to grant planning permission subject to a legal agreement members should therefore satisfy themselves that the subject matter of the proposed agreement will meet these tests.

BACKGROUND DOCUMENTS

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

APPENDICES

No.	Title
None	

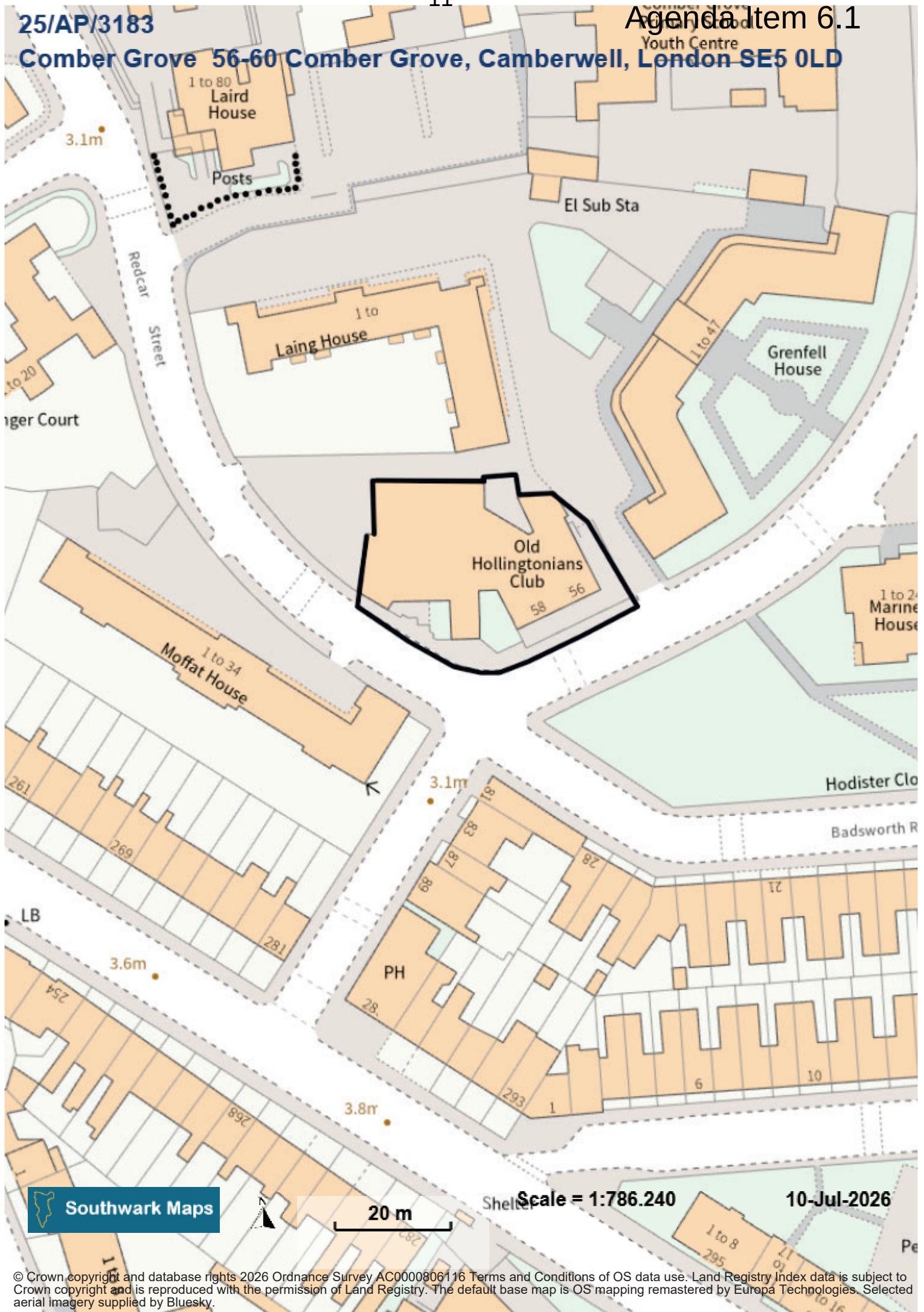
AUDIT TRAIL

Lead Officer	Chidilim Agada, Head of Constitutional Services		
Report Author	Kamil Dolebski, Head of Planning and Property Beverley Olamijulo, Constitutional Officer		
Version	Final		
Dated	13 July 2026		
Key Decision?	No		
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / EXECUTIVE MEMBER			
Officer Title		Comments sought	Comments included
Director of Law and Governance		Yes	Yes
Director of Planning and Growth		No	No
Executive Member		No	No
Date final report sent to Constitutional Team			13 July 2026

25/AP/3183

Agenda Item 6.1

Comber Grove 56-60 Comber Grove, Camberwell, London SE5 0LD



Contents

Contents	1
Planning Committee (Smaller Applications)	2
EXECUTIVE SUMMARY	3
BACKGROUND INFORMATION	3
Site location and description	3
Details of proposal	5
Planning policy	11
National Planning Policy Framework (the Framework) 2024	11
The London Plan 2021	12
Southwark Plan 2022	12
ASSESSMENT	13
Principle of the proposed development in terms of land use	13
Affordable housing, viability and tenure mix	17
Planning obligations (S.106 agreement)	47
Delivery & Servicing Management Plan	49
Travel Plan	49
Construction & Environmental Management Plan (CEMP)	49
Section 106 administration & compliance fee	51
Community involvement and engagement	51
Consultation responses from members of the public and local groups	52
Consultation responses from external consultees	62
Community impact and equalities assessment	63
Human rights implications	64
Positive and proactive statement	64
Positive and proactive engagement: summary table	65
BACKGROUND DOCUMENTS	66
APPENDICES	66
AUDIT TRAIL	67
Planning policy	88
National Planning Policy Framework (the Framework) 2024	88
The London Plan 2021	88
Southwark Plan 2022	89

Meeting Name:	Planning Committee (Smaller Applications)
Date:	22 July 2026
Report title:	Development Management planning application: 25/AP/3183: Full Planning Application Address: 56-60 Comber Grove, Camberwell, London SE5 0LQ Proposal: Demolition of existing buildings and the redevelopment of the site to provide 39 dwellings (Use Class C3) in a six-storey building, along with associated landscaping, dedicated plant and storage facilities, and other associated works.
Ward(s) or groups affected:	Camberwell Green
Classification:	Open
Reason for lateness (if applicable):	Not Applicable
From:	Director of Planning and Growth
Application Start Date: 12/11/2025	Application Expiry Date: 31/07/2026
Earliest Decision Date: 11/02/2026	

RECOMMENDATIONS

1. That planning permission be granted subject to conditions and the applicant entering into an appropriate legal agreement.
2. In the event that the requirements of paragraph 1 above are not met by 22 January 2027, the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reasons set out in below:

In the absence of a signed legal agreement, the proposal would fail to provide suitable mitigation in terms of planning gain contrary to policies DF1 'Delivery of the Plan and Planning Obligations' of the London Plan (2022), Policy P1 'Social rented and intermediate housing' and Policy 1P3 'Community Infrastructure Levy (CIL) and Section 106 Planning Obligations' of the Southwark Plan (2022) and the Southwark 'Section 106 Planning Obligations and Community

EXECUTIVE SUMMARY

3. The proposed development includes the demolition of the existing Old Hollingtonians Club which has been closed down for a number of years. The proposal includes the full redevelopment of the site to provide 39 dwellings (Use Class C3) in a six-storey building. The proposal includes appropriate landscaping at ground level and on the relevant roof areas as well as dedicated plant, refuse and cycle facilities at ground floor level. A lift is provided to upper floors.
4. The proposal would result in the loss of a community facility on site, however it has been demonstrated through marketing reports spanning a number of years since the facility has been vacant that no serious offers have been received and therefore the loss of the community facility is acceptable. The proposal provides 39 dwellings of that 40% affordable housing is provided on site, with a 25% split of social rented and shared ownership, in accordance with Policy P1 of the Southwark Plan (2022).
5. A contribution of £42,700 has been agreed towards a 10-year maintenance plan for the adjacent ball courts to ensure the community facility remains open and accessible for the surrounding residents. It is noted that the proposed six-storey building would result in a reduction to daylight at Grenfell House, Laing House and Moffatt House, however this is mostly due to the existing architecture (balconies) and positioning of the flank elevation on the boundary of the right of way and Council owned estate road. Overall, the impact on neighbouring amenity is considered acceptable in this urban location.
6. The proposal provides high quality accommodation with good internal space standards and access to daylight. The architectural design is contemporary yet contextual, using robust brickwork and detailing that echoes the design of nearby estate blocks. The regular grid of windows and balconies, interplay of brick tones, ribbed textures, and white accents ensure a rhythmic facade with strong horizontality. Overall, the architecture as refined is considered to achieve a high standard of design as required by policies. The proposal is acceptable in terms of transport, highways, ecology, trees and sustainability impacts.
7. Subject to conditions and a Section 106 Agreement to secure the relevant planning obligations, planning permission is recommended to be granted.

BACKGROUND INFORMATION

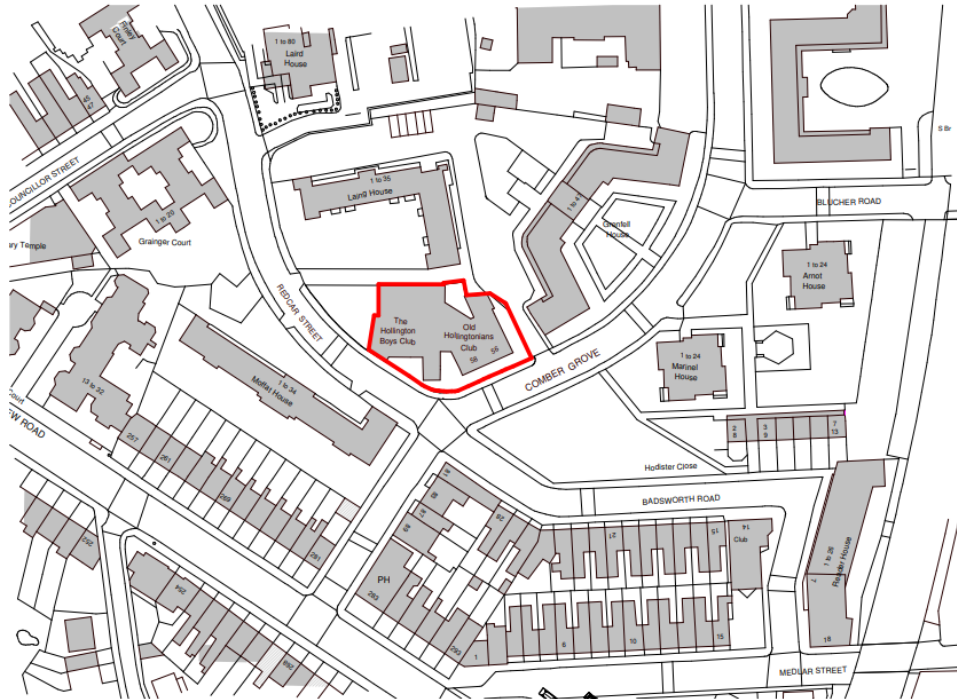
Site location and description

8. The application site is the youth club located on the corner of Comber Grove and Redcar Street, off Camberwell New Road. The club comprises a 1930s, two-storey brick building at 56-58 Comber Grove, with a 1970s, large single

storey extension onto Redcar Street that includes a double-height hall to the rear. The site is wedge-shaped, with its broadest part at its southern boundary and coming to a point at its northwestern corner some way up Redcar Street.

9. The main building (Old Hollingtonians Club) was constructed as part of the pre-war Comber Grove estate, which comprises mainly a series of four and five-storey, residential deck access blocks in a plain neo-classical style, with communal attic roofspace. The social housing blocks are notable for their serpentine layout, narrow depths and long, folded elevations that define intervening hard and soft landscaping.
10. The club is part of the Dulwich College Mission, and was established in the 1890s, initially in nearby Hollington Road (now demolished), providing a youth programme for some 200 boys in the deprived area of Camberwell. It moved 200m south to Comber Grove in the 1950s, as part of the estate's development.
11. The estate has a green and spacious character, aided by the blocks being set back from the pavement, often behind green margins, such as Moffat House opposite, and/or large lawned central gardens, including Grenfell House, which neighbours the site to the immediate northeast, and Laing House to the immediate rear. This green and spacious character is especially obvious onto Comber Grove where the 1930s estate gives way to green open space and low-rise Victorian terraced opposite within Badsworth Road, to the southeast of the site. Mature street trees and trees cover within the open space softens the townscape, with the street trees aligned to provide a dense, leafy avenue along the curving Comber Grove, adding to the street's appeal.
12. The wider context includes late Georgian townhouses onto Camberwell New Road and converted early 20th century corner pub (King William IV, now photo studios) and short early Victorian Terrace on the return into Comber Grove; the 1970s, 6-storey social housing of Marinel House and Arnot House, with their tight, pin-wheel floorplan, and associated low-rise liner block of flats; and tall, 1970s residential point blocks of the Wyndham Estate to the north of the site, along Redcar Street.
13. The site is outside a conservation area, and the premises is not listed. The nearest listed buildings are the Grade II terraced housing at 257-281 and 245-282 Camberwell New Road at its junction with Comber Grove, some 50-60m southwest. The former corner pub and adjacent terrace of 3 early 19th century houses (289-293) are locally listed. This stretch of road is designated within the Camberwell New Road conservation area, with the Hollington club and adjacent street tree forming part of its setting when viewed at the junction with Comber Grove.
14. The site is subject to the following planning designations:
 - Area Vision Boundary Camberwell
 - Hot Food Takeaway Exclusion Zone – Primary and Secondary School
 - Urban Zone
 - Flood Zone 3
 - AQMA

15.

**Location Plan****Details of proposal**

16. The proposed development includes the demolition of the existing Old Hollingtonians Club which has been closed for a number of years. The adjacent Council owned basketball ball court is not included within the application site line.
17. The proposal includes the full redevelopment of the site to provide 39 dwellings (Use Class C3) in a six-storey building.
18. The proposed development provides the following affordable housing provision:

	Private	Social rented	Shared ownership
No. units	25	9	5
No. habitable rooms	69	29	18
% by habitable room	60%	25%	15%
Total	39 units / 115 habitable rooms		

19. The proposal includes appropriate landscaping at ground level and on the relevant roof areas as well as dedicated plant, refuse and cycle facilities at ground floor level. A lift is provided to upper floors.

20.



Proposed Ground Floor Plan

21.



Proposed First Floor Plan

22.



Proposed Second Floor Plan

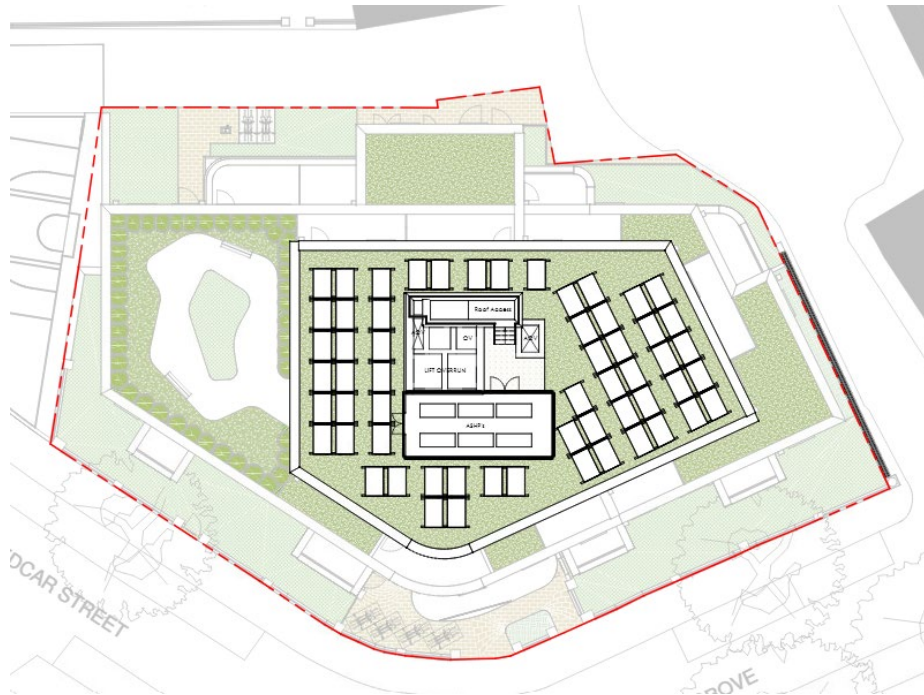
23.



Proposed Third Floor Plan

8

26.



Proposed Roof Plan

27.



Proposed South Elevation

28.



Proposed West Elevation

29.



Proposed North Elevation

30.



Proposed East Elevation

Planning policy

National Planning Policy Framework (the Framework) 2024

31. The revised National Planning Policy Framework ('NPPF') was published on 12 December 2024 which sets out the national planning policy and how this needs to be applied. The NPPF focuses on sustainable development with three key objectives - economic, social and environmental.
32. Paragraph 231 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications.
33. The relevant chapters from the Framework are:
 - Chapter 2 Achieving sustainable development
 - Chapter 5 Delivering a sufficient supply of homes
 - Chapter 8 Promoting healthy and safe communities
 - Chapter 9 Promoting sustainable transport
 - Chapter 11 Making effective use of land
 - Chapter 12 Achieving well-designed and beautiful places
 - Chapter 14 Meeting the challenge of climate change, flooding and coastal change
 - Chapter 15 Conserving and enhancing the natural environment
 - Chapter 16 Conserving and enhancing the historic environment

The London Plan 2021

- 34.
- Policy D3 Optimising site capacity through the design-led approach
 - Policy D4 Delivering good design
 - Policy D5 Inclusive design
 - Policy D6 Housing quality and standards
 - Policy D7 Accessible housing
 - Policy D8 Public realm
 - Policy D12 Fire safety
 - Policy D14 Noise
 - Policy H1 Increasing housing supply
 - Policy H4 Delivering affordable housing
 - Policy H6 Affordable housing tenure
 - Policy H9 Ensuring the best use of stock
 - Policy H10 Housing size mix
 - Policy S1 Developing London's social infrastructure
 - Policy S3 Education and childcare facilities
 - Policy S4 Play and informal recreation
 - Policy S5 Sports and recreation facilities
 - Policy HC1 Heritage conservation and growth
 - Policy G5 Urban greening
 - Policy G6 Biodiversity and access to nature
 - Policy G7 Trees and woodlands
 - Policy SI 1 Improving air quality
 - Policy SI 3 Energy infrastructure
 - Policy SI 5 Water infrastructure
 - Policy SI 12 Flood risk management
 - Policy SI 13 Sustainable drainage
 - 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 T7 Deliveries, servicing and construction

Southwark Plan 2022

35. The Southwark Plan 2022 was adopted on 23 February 2022. The plan provides strategic policies, development management policies, area visions and site allocations which set out the strategy for managing growth and development across the borough from 2019 to 2036. The relevant policies are:
- P1 Social rented and intermediate housing
 - P2 New family homes
 - P8 Wheelchair accessible and adaptable housing
 - P13 Design of places
 - P14 Design quality
 - P15 Residential design

- P16 Designing out crime
- P18 Efficient use of land
- P20 Conservation areas
- P21 Conservation of the historic environment and natural heritage
- P36 Development outside town centres
- P46 Leisure, arts and culture
- P47 Community uses
- P48 Hot food takeaways
- P49 Public transport
- P50 Highways impacts
- P51 Walking
- P53 Cycling
- P54 Car Parking
- P55 Parking standards for disabled people and the physically impaired
- P56 Protection of amenity
- P59 Green infrastructure
- P60 Biodiversity
- P61 Trees
- P65 Improving air quality
- P68 Reducing flood risk
- P69 Sustainability standards
- P70 Energy

Supplementary Planning Documents

36. Of relevance in the consideration of this application are:
- Affordable Housing SPD (2025)
 - Section 160 and Community Infrastructure Levy SPD (2025)
 - Climate and Environment SPD (2024)

ASSESSMENT

Principle of the proposed development in terms of land use

37. Policy P18 (Efficient use of land) of the Southwark Plan (2022) states that development will be permitted that optimises land use, does not unreasonably compromise development or legitimate activities on neighbouring sites and provides adequate servicing facilities, circulation spaces and access to, from and through the site.

Loss of community facility

38. The DCM Hollington Trust has supported the Comber Road Boxing Club since 1893, however in 2016 the club starting to face financial difficulties due to lack of funds and consequently closed. The existing building is currently vacant however it previously provided a youth facility to the local community. It has not been in active use since 2016. The facility included a boxing gym and sports hall, alongside various offices, smaller rooms and changing facilities. This is demonstrated on the existing plans as well as the photographs submitted as

part of the online marketing. The applicant considers that the existing use would fall into Use Class E – Commercial, business and service (d) for indoor sport, recreation or fitness, not involving motorised vehicles or firearms, principally to visiting members of the public. This view is based on the fact that primary use of the building was a boxing gym with a ring, showers, changing rooms and gym equipment to facilitate this use.

39. The breakdown of these uses is provided below:

Sports Hall – 166 sq.m
 Boxing Gym - 113 sq.m
 Changing rooms and Wc's – 59 sq.m
 IT room – 21 sq.m
 Lounge areas – 180 sq.m
 Garage – 32 sq.m
 Office space – 228 sq.m

Total: 799 sq.m

40. The applicant further argues that when considering the existing building in relation to Use Class F2 Local Community it does not fit any of the 4 parts:

- F2 Local community – Use as defined in 4 parts:
- F2(a) Shops (mostly) selling essential goods, including food, where the shop's premises do not exceed 280 square metres and there is no other such facility within 1000 metres
- F2(b) Halls or meeting places for the principal use of the local community
- F2(c) Areas or places for outdoor sport or recreation (not involving motorised vehicles or firearms)
- F2(d) Indoor or outdoor swimming pools or skating rinks

41. The applicant argues that the building was not a community hall/ meeting place for the principal use of local residents (as envisaged by F2(b)) it was a sports club open to all, run by a charity.

42. Notwithstanding the above, the proposed development would result in the loss of a community facility which would trigger Policy P47 (Community uses) of the Southwark Plan (2022). Whether the existing use was classified under Use Class E or Use Class F, this would not remove the requirement for marketing information. Policy P47 (Community uses) of the Southwark Plan (2022) does not distinguish between the use classes and thus a community facility encompasses a range of Use Classes and is not limited to those that fall under Use Class F.

43. Policy P47 (Community uses) of the Southwark Plan (2022) states that development must either retain community facilities; or in exceptional circumstances, community facilities can be replaced by another use where they are surplus to requirements. This needs to be demonstrated by a marketing

exercise for two years immediately prior to any planning application, for both its existing condition and as an opportunity for an improved community facility at market rates. In addition to the marketing exercise, an Equalities Impact Assessment would be required for any proposed loss of community facilities in predominant use by protected characteristic communities as defined by the Equality Act 2010 (this assessment of the EQIA is made in the relevant section of the report below). Development will be permitted where new community facilities are provided that are accessible for all members of the community.

44. A marketing statement has been submitted dated October 2025 by Kinney Green. The Council provides guidance on marketing statements and the applicant's marketing report has been assessed against these requirements. Officers have consulted with the Council's Local Economy Team and Planning Policy Team as part of this assessment who have not raised objection to the proposed development.
45. Marketing commenced on the site in 2016; discussions were held with the following local schools and charities between 2016 – 2017:
 - St John the Divine, Primary School, Camberwell,
 - Southwark Cathedral Trust,
 - Camberwell Church of England Diocese Church
 - Ark All Saints Academy London SE5

Despite the extensive discussions held with local groups, none produced a formal offer to purchase the freehold or any other form of joint venture proposal was received.

46. Following this, the Trust instructed the property to be put on the open market, with a preference for the buyer to acquire the freehold, refurbish and continue its use. Marketing was continued again from 2022, post Covid and further details of this is provided below, using the Council's guidance for marketing statements.

47. Active marketing should include the following:

1. Contact information posted in a prominent location on site, in the form of an advertising board

An advertising board is displayed on the site and shown on Appendix 4.

2. Registration of property with at least one commercial property agent.

Kinney Green LLP acquired Dron & Wright LLP in 2023 as Dron and Wright LLP ceased trading in 2023 and their clients and businesses were transferred to Kinney Green LLP at that time. Kinney Green LLP is a well-established Commercial Property Partnership with extensive experience of advising owners and occupiers in all matters relating to their commercial property occupation.

In 2023, Kinney Green LLP were not the sole commercial agent. Dexters were also used as another local commercial property agent. The marketing statement demonstrates registration of the commercial property with two different agents.

3. Property details / particulars available to inquirers on request.

Appendix 1 and 2 of the submitted marketing statement provides the property details by both Dron & Wright and Dexters.

4. Property marketed for the appropriate use or uses as defined by the relevant planning policy.

Appendix 1 and 2 describe the property as indoor sport, recreation or fitness gyms and is therefore marketed as community use. It is noted that these appendices are prior to the use class order change and refer to the use as D2.

5. Property marketed at a reasonable price in relation to use, condition, quality and location.

Appendix 2 states that Dexters are inviting offers in excess of £3,500,000 subject to planning for the purchase of this exciting mixed use development opportunity. It further states that new youth club facilities are to be returned back to shell and core at an agreed standard and that joint ventures will also be considered by the vendor. Appendix 1 states that a price would be provided on application. This is justified within the marketing statement due to the disparity between the existing use value and the likely redevelopment value. Further details are also provided in relation to the Charities Act.

48. Sufficient detailed information is required to be submitted alongside any planning application to demonstrate compliance with the above criteria. In addition, information should be submitted regarding:

1. the number and details of enquiries received;

Appendix 5 details the schedule of enquiries undertaken from October 2025.

2. the number of viewings;

None of the interest shown has progressed beyond the initial enquiry stage. Despite extensive marketing from both commercial property agents spanning a period of c.18 months in 2016/2017 and over the past 36 months since 2022 there have been no serious enquiries for the entire property from Use Class D2 or Use Class E operators.

3. the number, type, proposed uses and value of offers received;

No serious offers received.

4. reasons for refusal of any offer received, and/or reasons why any offers fell through;

No serious offers received.

5. the asking price and/or rent that the site or property has been offered at, including a professional valuation from at least three agents to confirm that this

is reasonable;

No serious offers received.

6.the length of marketing period (at least two years continuous marketing), including dates, and

2016 – 2017 and 2022 – 2025.

7.the length of the vacancy period.

Since 2016.

49. The above demonstrates that the applicant has marketed the vacant facility for a sufficient time period and there has been no serious offers received. As such, the proposal is acceptable in this regard and the loss of the community facility to provide housing (including 40% affordable) is considered acceptable. It is noted however that the site is adjacent to the Council owned ball court which is undergoing resurfacing. Discussions between the Council's Public Health team and the applicant have agreed a financial contribution towards a 10-year maintenance plan to support the upkeep of the adjacent facility. This has been agreed at **£42,700** and has been included within the s106.
50. The Council's Local Economy team has been consulted on the loss of 911 sqm of employment floor space with no reprovion would trigger a financial contribution of £6,549 to be secured within the Section 106 Legal Agreement. This has been calculated as per Policy P30, where employment floorspace is lost, a financial contribution equivalent to 10% of the number of FTE jobs displaced × £5,500 per job must be secured.
51. As a major development, the proposal is required to align with the Council's approach to supporting employment, skills and local procurement. However, based on the scale of development (total GEA < 5,000 sqm) and in accordance with LET's calculations, this scheme does not accrue any minimum construction-phase employment, apprenticeship or short-course output obligations.
52. As there will be 1,000sqm or more of gross new floorspace, the applicant should allow local businesses to tender for the procurement of goods and services generated by the development both during and after construction. The Council would welcome active steps to promote this.

Affordable housing, viability and tenure mix

53. Policy P1 (Social rented and intermediate housing) of the Southwark Plan (2022) states that development that creates 10 or more homes must provide the maximum viable amount of social rented and intermediate homes. The minimum amount should be 35%, as set out in Table 1, subject to viability. Intermediate tenure homes should be suitable for households on a range of incomes. This may require a mix of shared ownership and other intermediate tenure homes.
54. In exceptional circumstances the applicant can follow the fast-track route.

Where development provides 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) as set out in Table 1 with no grant subsidy. Where developments follow the fast track route, they will not be subject to a viability appraisal. A viability appraisal will be necessary if amendments are proposed to lower the affordable housing provision to less than 40% following the grant of planning permission.

55. The proposed development provides onsite affordable housing in line with Policy P1. The breakdown of these units by habitable room is as follows:

	Private	Social rented	Shared ownership
No. habitable rooms	69	29	18
%	60%	25%	15%
Total	115		

56. The breakdown by unit is also provided below:

	Private	Social rented	Shared ownership
No. units	25	9	5
Total	39		

57. The proposed development therefore provides a policy compliant tenure mix in accordance with Policy P1 (Social rented and intermediate housing) of the Southwark Plan (2022) and no viability appraisal is necessary for this scheme. Furthermore, the applicant has been discussing with Metropolitan Thames Valley (MTVH) with regards to a housing association partner. Once planning permission has been granted it will be possible for the sale and purchase contract to be advanced.

Viability review mechanisms

58. In accordance with the Affordable Housing SPD (July 2025), 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
59. Where developments follow the Fast Track Route, they will not be subject to a viability assessment. However, viability assessments may be required if amendments are made following the grant of permission. This application is providing 40% affordable housing and therefore qualifies for the fast-track route.

Dwelling mix including wheelchair housing

60. Policy P2 of the Southwark Plan (2022) seeks to ensure that a minimum of 60% of homes with two or more bedrooms are provided. A minimum of 20% of

family homes with three or more bedrooms are sought in the Central Activities Zone. The policy also requires two-bedroom homes as a mix of two bedroom 3 person and two bedroom 4 person homes.

61. Policy H10 of the London Plan relates to housing size and mix; it seeks to guide borough and developers on unit mix within new residential developments, and states that schemes should generally consist of a range of unit sizes having regard to robust local evidence, the requirement to deliver mixed and inclusive neighbourhoods and the range of tenures in the scheme.

62.

Dwelling size	No. of units	Percentage
1 Bedroom	12	30.8%
2 Bedrooms	17	43.6%
3 Bedrooms	10	25.6%
Total	39	100%

63.

<i>Are a minimum of 60% of homes with two bedrooms or more?</i>	Yes, 69.2% have 2 bedrooms or more.
<i>Are a minimum of 20% of homes with three bedrooms or more?</i>	Yes, 25.6% have 3 bedrooms or more.
<i>Is there a mix of 2 bed/3 person and 2 bed/4 person homes?</i>	Yes, there are 11 x 2 bed / 3 person and 6 x 2 bed/ 4 person flats.

64. The proposal therefore complies with the requirements of Policy P2 of the Southwark Plan (2022).

Wheelchair housing

65. In accordance with Policy P8 (Wheelchair accessible and adaptable housing) of the Southwark Plan (2022), new build major residential development must:
1. Meet Building Regulation M4(3) standard (Wheelchair User Dwellings) in at least 10% of homes (as measured in habitable rooms) and
 2. The remaining dwellings must meet Building Regulation M4(2) (accessible and adaptable dwellings) and;
 3. Where those homes are affordable wheelchair user homes, 10% of social rented homes must be wheelchair accessible and meet Building Regulation M4(3)(2)(b) standard (Wheelchair accessible dwellings).
66. The proposed development would provide 2 x 1 bed / 2 person flats and 3 x 2 bed / 3 person flats as wheelchair housing. This would equate to 11.3% when calculated by habitable room and is therefore in accordance with policy. All wheelchair housing is social rented and therefore accords with policy requirements.

Quality of residential accommodation, outdoor amenity space and children's play space

Quality of residential accommodation

67. London Plan Policy D6 (Housing quality and standards) states that housing developments should be of high quality and provide adequately sized rooms, with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners. The policy sets out a range of qualitative design aspects for housing developments relating to dwelling size, aspect, daylight, layout and amenity space. Policy P15 (Residential design) of the Southwark Plan (2022) sets out that development must achieve an exemplary standard of residential design and must take into consideration the site context, the impact on the amenity of adjoining occupiers, and the quality of accommodation.
68. With regard to the proposed accommodation within the scheme, the application is supported by a Daylight and Sunlight Report which assesses the accommodation for future occupiers of the site. The analysis has considered 116 habitable rooms. The results demonstrate that 115 (99%) will achieve or exceed the numerical targets with reference to BS EN 17037, with the one exception being a bedroom. The results of the analysis therefore demonstrate that the scheme will provide accommodation with good access to daylight.
69. With regard to internal floor areas, all flats would meet minimum floor areas in accordance with national space standards. Overall, the individual room sizes within the flats are of appropriate sizes. The proposed accommodation would therefore provide spacious apartments with a good level of daylight and a good overall layout to provide a high-quality standard of living. The flats are positioned around a central core providing good access staircase and lifts to all flats within the floor.

Outdoor amenity space

70. All flatted developments must provide some form of outdoor amenity space. This must include communal amenity space and where possible private amenity space. All flatted developments must meet the following minimum standards and seek to exceed these where possible:
 - 50 sqm communal amenity space per development
 - For units containing three or more bedrooms, 10 sqm of private amenity space
 - For units containing two or less bedrooms, 10 sqm of private amenity space should ideally be provided. Where it is not possible to provide 10 sqm of private amenity space, as much space as possible should be provided as private amenity space, with the remaining amount added towards the communal amenity space requirement. For example, if a private balcony of 3 sqm can be provided, 7 sqm should be added onto the communal amenity space
 - Balconies, terraces and roof gardens must be a minimum of 3 sqm to count towards private amenity space

71. As set out within the Section 106 and Community Infrastructure Levy (CIL) SPD (July 2025), all new housing and flat developments must provide some form of outdoor amenity space. Where amenity space cannot be provided on site, a financial contribution is sought using the calculation below:

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

72. The proposed development provides the following private amenity space. The flats are not labelled with a number, so Officers have taken the flat closest to the entrance door and worked around in a clockwise direction to allocate them a number for the purposes of the table below.

Flat	Private amenity space (sq.m)
G-1	5.8
G-2	7.2
G-3	7.0
G-4	10.5
1-1	10.2
1-2	7.2
1-3	10
1-4	6.8
1-5	6.4
1-6	7.0
1-7	7.9
1-8	7.9
2-1	10.2
2-2	7.2
2-3	10.8
2-4	7.2
2-5	6.4
2-6	7.0
2-7	7.9
2-8	7.9
3-1	10.2
3-2	7.2
3-3	10.8
3-4	7.2
3-5	6.4
3-6	7.0
3-7	7.9
3-8	7.9
4-1	10.2
4-2	7.2
4-3	10.8
4-4	7.2
4-5	8.7
4-6	10.0
4-7	6.3
4-8	6.3
5-1	10.5

5-2	9.7
5-3	9.7
5-4	6.3
Total	326

73. The proposed development provides 326 sq.m of private amenity space across 39 dwellings. The total requirement would be $39 \times 10 \text{ sq.m} = 390 \text{ sq.m}$. The shortfall is therefore **64 sq.m**.
74. The proposed development provides 132.8 sq.m of communal amenity space on the fifth floor, exceeding the requirement of 50 sq.m by 82.8 sq.m. In accordance with policy guidance above, as much space as possible should be provided as private amenity space, with the remaining amount added towards the communal amenity space requirement. As such there would be no financial contribution requirement for the provision of communal amenity space. The 64 sq.m shortfall is made up by the 82.8 sq.m surplus for the communal amenity space.

Children's Play Space

75. In addition to the communal amenity space requirements, children's play areas should be provided in all new flat developments containing the potential for 10 or more child bed spaces. This is a requirement from London Plan Policy 3.6 and the Mayor's Supplementary Planning Guidance on Providing for Children and Young People's Play and Informal Recreation.
76. This is calculated on the basis that:
- For private and intermediate housing:
- 2-bedroom houses or flats create 0.11 child bed spaces per unit
 - 3-bedroom houses or flats create 0.42 child bed spaces per unit
- For social for rent housing:
- 2-bedroom houses or flats create 0.40 child bed spaces per unit
 - 3-bedroom houses or flats create 1.88 child bed spaces per unit
77. A minimum of 10 sqm of play space per child bedspace should be provided within the development. Play areas should be overlooked by nearby housing. A management and maintenance scheme of the play area is required to be provided by the applicant establishing the management and maintenance regime for the children's play area.
78. The proposed development provides the following:
79. **Private:**

<u>Dwelling size</u>	<u>No. of units</u>	<u>Child bed space</u>
1 Bedroom	10	N/A
2 Bedrooms	11	$0.11 \times 11 = 1.21$
3 Bedrooms	4	$0.42 \times 4 = 1.68$
Total	25	2.89

80. **Social Rented:**

<u>Dwelling size</u>	<u>No. of units</u>	<u>Child bed space</u>
1 Bedroom	5	N/A
2 Bedrooms	1	0.40 x 1 = 0.40
3 Bedrooms	3	1.88 x 3 = 5.64
Total	9	6.04

81. **Shared ownership:**

<u>Dwelling size</u>	<u>No. of units</u>	<u>Child bed space</u>
1 Bedroom	0	N/A
2 Bedrooms	2	0.11 x 2 = 0.22
3 Bedrooms	3	0.42 x 3 = 1.26
Total	5	1.48

82. In accordance with London Plan Policy, as the child bed space number exceeds 10 then 10 sq.m per children's bed space should be provided.

The calculation is as follows:

$$10.41 \times 10 \text{ sq.m} = \mathbf{104 \text{ sq.m}}$$

83. As this cannot be provided on site, a financial contribution has been sought.

$$104 \text{ sq.m} \times \text{£}325 = \mathbf{\text{£}33,832.50}.$$

This has been included within the Section 106 Legal Agreement.

Fire Safety Regulations

Policy D12 (A) of the London Plan (2021)

84. Policy D12 (A) of the London Plan (2021) requires that all development must submit a planning fire safety strategy. The fire safety strategy should address criteria outlined in Policy D12 (A). Major developments are required to submit a Fire Statement which should refer to the draft fire statement guidance in London Plan Policy D12 (B) and provide all listed required information. Developments may also be required to submit a gateway 1 (fire safety) form if the development is considered a relevant building:

- Contains two or more dwellings or educational accommodation and;
- Meets the height condition of 18m or more in height, or more than 7 storeys

The Health and Safety Executive (HSE) has been consulted on this application for completeness who have confirmed that this application does not appear to fall under the remit of planning gateway one because the height condition of a relevant building is not met.

85. The applicant has supported their planning application with a Planning Fire Statement by Evolution Safety Solutions Ltd dated October 2025.

This statement has been developed using the following information:

- A full set of architectural floorplans and a schedule of accommodation (dated February 2025)
 - Confirmation that the development is 100% residential with no commercial use
 - Client confirmation of intended evacuation strategy ('stay put')
 - Construction assumptions including a concrete frame, brick outer skin, mineral wool insulation, and lightweight steel framing (LSF) inner skin
 - Indication of fire service access via Comber Grove and Redcar Street, with a dry riser proposed near the main entrance
 - Client intent to include sprinkler systems and smoke ventilation.
86. No site investigations or design development workshops have been undertaken in the preparation of this statement. Therefore, this report does not constitute a detailed fire strategy, nor does it confirm compliance with Building Regulations Part B, which must be addressed during the detailed design and construction phase. The statement identifies how fire safety has been considered for access to fire appliances and evacuation assembly, lift safety measures, construction approach and fire spread mitigation, means of escape and inclusive design, robust evacuation strategy and firefighting access and equipment. Further details of these principles and how the development addresses them can be found within the submitted statement.
87. London Fire & Emergency Planning Authority have been consulted on the application; however no response has been received.
88. Paragraph 3.12.9 of Policy D12 explains that Fire Statements should be produced by someone who is "third-party independent and suitably qualified". The council considers this to be a qualified engineer with relevant experience in fire safety, such as a chartered engineer registered with the Engineering Council by the Institution of Fire Engineers, or a suitably qualified and competent professional with the demonstrable experience to address the complexity of the design being proposed. This should be evidenced in the fire statement. The council accepts Fire Statements in good faith on that basis. The duty to identify fire risks and hazards in premises and to take appropriate action lies solely with the developer. The fire statement has been reviewed by the Council and consulted on with HSE.

Design, layout, heritage assets and impact on Borough and London views

Site layout, context and heritage values

89. The application site is the youth club located on the corner of Comber Grove and Redcar Street, off Camberwell New Road. The club comprises a 1930s, two-storey brick building at 56-58 Comber Grove, with a 1970s, large single storey extension onto Redcar Street that includes a double-height hall to the

rear. The site is wedge-shaped, with its broadest part at its southern boundary and coming to a point at its northwestern corner some way up Redcar Street.

90. The main building (Old Hollingtonians Club) was constructed as part of the pre-war Comber Grove estate, which comprises mainly a series of four and five-storey, residential deck access blocks in a plain neo-classical style, with communal attic roofspace. The social housing blocks are notable for their serpentine layout, narrow depths and long, folded elevations that define intervening hard and soft landscaping.
91. The club is part of the Dulwich College Mission, and was established in the 1890s, initially in nearby Hollington Road (now demolished), providing a youth programme for some 200 boys in the deprived area of Camberwell. It moved 200m south to Comber Grove in the 1950s, as part of the estate's development.
92. The estate has a green and spacious character, aided by the blocks being set back from the pavement, often behind green margins, such as Moffat House opposite, and/or large lawned central gardens, including Grenfell House, which neighbours the site to the immediate northeast, and Laing House to the immediate rear. This green and spacious character is especially obvious onto Comber Grove where the 1930s estate gives way to green open space and low-rise Victorian terraced opposite within Badsworth Road, to the southeast of the site. Mature street trees and tree cover within the open space softens the townscape, with the street trees aligned to provide a dense, leafy avenue along the curving Comber Grove, adding to the street's appeal.
93. The wider context includes late Georgian townhouses onto Camberwell New Road and converted early 20th century corner pub (King William IV, now photo studios) and short early Victorian Terrace on the return into Comber Grove; the 1970s, 6-storey social housing of Marinel House and Arnot House, with their tight, pin-wheel floorplan, and associated low-rise liner block of flats; and tall, 1970s residential point blocks of the Wyndham Estate to the north of the site, along Redcar Street.
94. The site is outside a conservation area and the premises is not listed. The nearest listed buildings are the Grade II terraced housing at 257-281 and 245-282 Camberwell New Road at its junction with Comber Grove, some 50-60m southwest. The former corner pub and adjacent terrace of 3 early 19th century houses (289-293) are locally listed. This stretch of road is designated within the Camberwell New Road conservation area, with the Hollington club and adjacent street tree forming part of its setting when viewed at the junction with Comber Grove.

Height, form and massing

95. The proposed height, form and massing is virtually identical to that proposed under 25/EQ/0069. The block will follow a hexagonal footprint and be 6 storeys overall. The massing is slightly set back from the east at 4/F. At 5/F, it is recessed from all edges, allowing for rooftop amenity space to the west particularly.

96. In terms of the planform, while more separation from the neighbouring blocks would be ideal, the hexagonal layout is considered a logical response to optimise the site capacity. The planform has been designed with reference to the building lines of Laing House in the north and Grenfell House in the east for a more coherent relationship in the streetscape. To the front, the building lines onto Redcar Street and Comber Grove are in keeping with the setback character of buildings in the vicinity and allows for a decent buffer between the private and public realm. Additionally, instead of an angled corner with an undercroft facing the junction, the design with a curved corner would address the bend of the streets more naturally and avoid a negative space within the street scene.
97. Existing street trees on Redcar Street and Comber Grove contribute positively to the streetscape and should be preserved. Where concerns were raised regarding potential harm to the trees, the applicant has confirmed that sufficient space has been allowed for their retention and maintenance.
98. At a shoulder height of 5 storeys, the proposed development would remain sufficiently scaled within the context of Redcar Street, and not too uncomfortably scaled within Comber Grove, given the green space opposite. The setback from the east and north at 4-5/F allows for a moderated transition in height between the proposed block and Grenfell House/ Laing House, especially in views along Comber Grove, and helps reduce the bulkiness of the building when viewed from the rear car park/ servicing area of the estate blocks.
99. The setback of the top floor from the south (front) is considered sufficient not to impose on the immediate street scene or in view from Camberwell New Road. The top floor will be evident in middle distance views from Comber Grove, Badsworth Road and obliquely along Redcar Street, although its massing is sufficiently alleviated.
100. The roof plant and lift overrun will introduce an additional height of roughly 2m at the maximum. However, given their central positioning, they would not result in significant rooftop bulk or clutter. This is evidenced by views in the DAS, which have been confirmed to include these elements.

Internal layout/ quality of accommodation

101. In line with pre-application advice, the layout at G/F has been revised with a cycle store instead of a flat at the northwest corner. This resolves previous concerns about potential nuisance that a flat may experience due to activity in the adjacent ballcourt; and isolation of the 3b5p flat in the southeast corner between cycle and bin stores.
102. Locating the plant rooms and cycle storage in the north/ northwest is considered sensible such that south facing floorspace can be reserved for residential use and the street frontages could benefit from natural surveillance. However, access to the cycle storage and utilities will require passage through council-owned land. To approve this scheme will necessitate maintenance of the access road and may restrict future redevelopment of the estate (DM to consider).

103. On the upper floors, the pinwheel layout appears efficient in delivering 4-8 flats per floor with high numbers of dual aspect. Flats that fail to achieve dual aspect as defined by the GLA will be south facing (2B3P on the typical floors, 1B2P WCH on the 4/F). All KLD areas will receive direct sunlight. Rear flats that are north-facing and positioned close to the tall, flank wall of Laing House will benefit from secondary outlook to the east and west. At the top floor, thought have been given to safeguard privacy of flat against the shared amenity space by using opaque windows and planting.
104. Scaled sectional drawings have been provided to confirm a minimum floor to ceiling height of 2.5m across all units and the change in level at G/F. The proposal of a dual entrance lift to negotiate the half-level at G/F seems inefficient. That said, raising the ground floor residential units above grade by 900mm would improve its amenity to some extent in terms of outlook and privacy, and address flood risk.

Architectural design

105. The facades will be articulated through a combination of punched-hole openings and balconies in an orderly pattern. A minimum depth of reveal of 150mm, as specified in the elevation drawings, is considered appropriate. A combination of semi-inset and projecting balconies is proposed. The former balances solar access and shading and offers some level of privacy in the south facing rooms. The latter allows more daylighting into the internal rooms and are considered suitable on the north and east elevations. Following pre-application advice, the projecting balconies for the 2b4p flats at the northeastern corner have been slightly recessed from the adjacent facades so as to appear incidental rather than integral to the brick envelope and to better showcase the reference to the building line of Grenfell House. This would also avoid the challenge of bolting the balcony into corner brickwork which could be vulnerable to impact. The extent of recess (by 1.5 brick's depth where possible) should be confirmed by way of detailed drawings.
106. There is a horizontal emphasis in the elevational design which is evident in the white banding to the underside of balconies, similar to Laing House and Grenfell House nearby. The ribbed brickwork between the windows on the south and east elevations adds texture and reinforces the horizontality. While the crown of the building is clearly distinguished through a change in the colour of the brickwork, the base of the building is subtly defined by continuous ribbed brickwork and a soldier course banding above.
107. As requested, the parapet has been refined to incorporate soldier course detailing with aluminium coping and recessed brick banding below. Additional recessed soldier course banding is introduced at the base of fourth floor and fifth floor, reflecting the design of Laing House.
108. Overall, the strategy of having more visually expressive elevations along the streets, while keeping the northern elevations relatively modest to mirror the architectural language of Laing House is considered appropriate. The various detailing to articulate the facade and add visual interest are welcomed. Bay studies have been provided to clarify the design of balconies at ground level

and the design of the entrance canopy, which generally demonstrate a well-detailed construction. Having the building signage above the entrance canopy as cut-out letters is considered an elegant and legible design. Further detailed construction drawings should be conditioned to ensure a high-quality development.

109. In terms of materiality, red bricks as the main cladding material and dark brown bricks for the recessed floors are considered reflective of the local context. It would allow the development to sit comfortably within the settings of the nearby listed buildings and the conservation area. White GRC for the entrance canopy and balcony undersides, as well as dark grey aluminium for the windows, doors and balustrades would offer a complementary and contemporary accent. Sample materials should be required by condition. Full bricks instead of brick slips should be used to ensure a robust appearance and they should be multi-stock for visual interest.

Boundary treatment

110. Details about boundary treatments are provided in the DAS and elevation drawings. The combination of dwarf brick walls, metal railings and planting on the south elevations and the retention of the existing brick wall on the eastern boundary relate positively to the design at Grenfell House adjacent. 900mm high railings with planting at the northeast is considered appropriate for the less formal corner. Turning the corner, it rises to a 3m solid brick wall on the west elevation. The tall wall will restrict outlook from the living room of the adjacent flat. There is however another aspect of outlook available. The height of the wall is also justifiable as a means to screen the residents from activity in the adjacent ball court. The refined design with ribbed brick texture is welcome for visual interest and deterring graffiti.

Conclusion on design matters

111. The proposed height is respectful of the prevailing height of the nearby estate blocks. The form and massing relate positively to the neighbouring Grenfell House and Laing House and address the bend of the road properly. Although visible from Camberwell New Road, it will not appear overly dominant to the detriment of the setting of the listed and locally listed buildings. The height, form and massing is acceptable on urban design and conservation grounds.
112. The architectural design is contemporary yet contextual, using robust brickwork and detailing that echoes the design of nearby estate blocks. The regular grid of windows and balconies, interplay of brick tones, ribbed textures, and white accents ensure a rhythmic facade with strong horizontality. Overall, the architecture as refined is considered to achieve a high standard of design as required by policies. The proposal is therefore recommended for approval subject to the following above grade conditions relating to sample materials and detailed drawings.

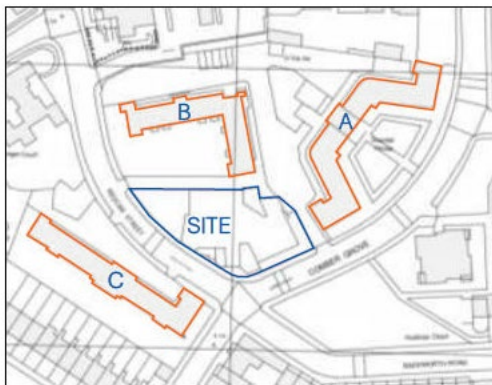
Impact of proposed development on amenity of adjoining occupiers and surrounding area

113. The application is supported by a Daylight and Sunlight Report (Rev A) by CHP Surveyors dated 30 October 2025. The assessments have been undertaken in accordance with the Building Research Establishment's publication 'Site Layout planning for daylight and sunlight. A guide to good practice.' (2022) (BRE Guidelines).

114. The application site is surrounded by the following neighbouring buildings:

- Grenfell House
- Laing House
- Moffatt House

These are demonstrated on the location plan below:



- A. Grenfell House
- B. Laing House
- C. Moffatt House

115. These need to be taken into consideration with regard to loss of light, loss of privacy and overbearing impact as a result of the proposed development. Each building will be taken in turn in the assessment below.

Daylight Assessment methodology

116. Daylight is assessed using Vertical Sky Component (VSC) analysis. The numerical values contained in the BRE guidelines are used to establish whether the proposals will have a significant effect on the daylight enjoyed by the neighbouring properties and are based initially on a Vertical Sky Component (VSC) analysis. This analysis establishes the amount of available daylight received directly from the sky for each individual window. The reference point for this analysis is the centre point of the window.

117. This analysis advises that each window should achieve a VSC of 27% or 0.8 times the existing value. However, it is acknowledged that in urban locations these values cannot always be achieved.

Grenfell House

118. Grenfell House is located to the east of the site and provides residential accommodation over five floors. The property has balconies extending over a number of windows that serve habitable rooms.



The application site is shown in blue, Grenfell House is shown in orange.

120. Appendix B & C of the Daylight and Sunlight report provide graphical diagrams as well as tabular results indicating the windows (and their use) which would be impacted as a result of the proposed development.

121. The flank elevation immediately adjacent to the proposed development (serving W11 and W12 on the ground, first, second and third floor level) serve secondary windows to kitchens and living rooms. These windows serve room 8 which is also served by W13. The proposed VSC to these windows are reduced to between 13.2% to 25% from between 26.2% to 38.1%. This would result in a VSC below recommended guidelines, however given these rooms are served by other windows and in combination with the building lines close proximity to the boundary, the impact on daylight to these rooms on this elevation is considered acceptable in this urban context.

122. W1, W2 and W3 on the elevation facing the application site all serve bedrooms on the ground, first, second and third floor. These are also served by overhanging balconies along the length of the elevation as shown by the image below.

123.



124. As such the existing VSC is already below recommended guidelines due to the existing architecture of the Grenfell House. Furthermore, these windows serve bedrooms, which in accordance with BRE guidelines require less daylight than living spaces throughout the day. Further testing, without the balconies, has been undertaken to these windows which show the presence of these balconies to be the main contributing factor to the poor daylight to these rooms. Overall, given the urban context, the impact to daylight on these bedrooms is considered acceptable.
125. In regards to loss of privacy and the relationship with these windows on the flank elevation of Grenfell House. The balcony serving these flats is not positioned adjacent to these windows on the flank elevation and would therefore not offer direct views into the windows. With regards to windows serving habitable rooms, the 6.3m separation distance relates to windows providing a secondary outlook within the proposed development and also those rooms within Grenfell House. At fourth floor level the massing is stepped away from the boundary on this elevation. Given the existing built form positioned within such close proximity to the Council owned estate road (as demonstrated by the photo below), the relationship with regards to loss of privacy and overbearing impact is considered acceptable.

126.



Laing House

127. Laing House is located to the north of the site and provides residential accommodation over five floors. This property has balconies projecting over a number of windows.

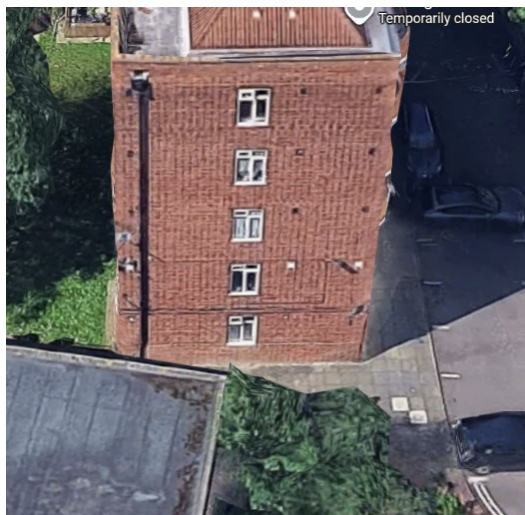
128.



The application site is shown in blue and Laing House is shown in orange.

129. Appendix B & C of the Daylight and Sunlight report provide graphical diagrams as well as tabular results indicating the windows (and their use) which would be impacted as a result of the proposed development.
130. The results of the VSC analysis demonstrate that Laing House as existing would not achieve the BRE guideline target of 27%. The results demonstrate that 82% of the windows will achieve the numerical values set out within BRE guidelines. One of the reasons that more windows do not achieve the numerical targets is that they are located under balconies and as a result in the existing situation achieve a VSC below 10%. As a result, any reduction would appear disproportionate, and it is therefore the design of Laing House that is restricting access to daylight.
131. To demonstrate the above position, a without balconies assessment has been carried out whereby 105 out of 110 windows would reach the BRE guidelines of >27% or 0.8 times the existing.
132. With regards to loss of privacy, the balconies to the rear of the application site have been positioned as to not face the windows on the flank elevation of Laing House. In a similar way to the relationship with Grenfell House, there is a 6.5m separation distance between Laing House and the proposed development due to Laing House being built right up to the boundary and the existing site being underdeveloped.
133. The windows on the flank elevation of Laing House adjacent to the public right of way are shown in the image below.

134.



135.



136. These images above show how the existing building of Laing House has been built in close proximity to the public right of way between the buildings and therefore any development of a similar height to Laing House is going to have some impact in terms of neighbouring amenity.

137. In summary, the impact to Laing House with regards to loss of privacy, overbearing impact and loss of light is considered acceptable when taking into account the existing location and built form of Laing House and the presence of the existing balconies.

Moffatt House

138. Moffatt House is located to the southwest of the site and provides residential accommodation over five floors. This property has balconies over a number of windows.

139.



The application site is shown in blue, Moffatt House is shown in orange.

140. Appendix B & C of the Daylight and Sunlight report provide graphical diagrams

as well as tabular results indicating the windows (and their use) which would be impacted as a result of the proposed development.

141. W1 serves a second window to the living room and W2 and W3 serve a bedroom across the ground, first, second and third floor. The existing VSC for these windows ranges between 24.1% and 32.6% and would reduce to between 21.2% to 31.9%.

142. The existing architecture of Moffatt House is shown by the image below.



144. The summary of the VSC results is that of the 12 windows assessed, 6 windows would achieve 27%, 3 windows would achieve 20%-27% and 3 would achieve 15-20%. These results are considered appropriate for an urban location such as this.

145. With regards to loss of privacy and overbearing impact. The proposed development is on the opposite site of Redcar Street to Moffatt House and is therefore separated by a road. The provision of a six-storey residential building in this location is considered appropriate and would not result in an overbearing impact. Furthermore, there is a 17.1m – 24.2m separation distance between the two buildings and therefore no concerns are raised with regards to loss of privacy or overbearing impact.

Summary on neighbouring amenity matters

146. In conclusion, the daylight assessment considered 154 windows within the neighbouring properties that serve 99 rooms. The result of the analysis demonstrates that 127 (82%) of the windows will achieve the numerical values set out within the BRE guidelines, where necessary taking into account the design of the neighbouring properties restricting access to daylight themselves. For those windows that do not achieve the recommended guidelines, they generally achieve a VSC appropriate for an urban location such as this.

147. An assessment has also been undertaken to establish whether the neighbours amenity spaces will enjoy adequate levels of sunlight following the implementation of the proposals. The results demonstrate that over 50% will enjoy at least 2hrs of direct sunlight on 21st March and will therefore have good access to sunlight. Overall, the proposed development is acceptable with regards to neighbouring amenity.

Landscaping and trees

148. Policy G5 (Urban Greening) of the London Plan (2021) states that:

A - Major development proposals should 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.

B - Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2 but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development (excluding B2 and B8 uses).

C - Existing green cover retained on site should count towards developments meeting the interim target scores set out in (B) based on the factors set out in Table 8.2.

149. The application is a major residential development and therefore is required to achieve 0.4 UGF. The application is supported by a UGF calculator demonstrating that the scheme achieves 0.4 on site and is therefore policy compliant.

150. The Council's Urban Forester has been consulted and has made the following comments. A review of the amended AIA confirms that only fibrous roots were found in the one trench excavated. Although this does not rule out roots under the main structure, this would only impact foundation design rather than a reason for refusal as piles can be suitably sited to bridge structural roots. A details AMS which includes demolition details, scaffold extents, hoarding and piling mat placement is required by condition.

151. In conclusion, officers consider that the scheme make a positive contribution to the urban greening of London in accordance with policies P59 of the Southwark Plan and London Plan Policy G5.

Transport and Highways

152. The site is in a PTAL 5. Comber Grove and Redcar Road are not classified roads. The site is located near Camberwell New Road which is on the TLRN. The site is within the Camberwell CPZ, operating Monday to Friday between the hours of 0830 - 1830. There is permit-holder parking adjacent to the site on Redcar Road. There are street trees and lighting columns on the footway adjacent to the site. Junction with Badsworth Road is opposite the site. There is a private access road next to the site leading to permit holder parking at the rear. The site is near to the Camberwell Road Conservation Area.

153. Transport Policy, Highways and Transport for London (TfL) have all been consulted on both schemes and their comments are included below.

Cycle Parking

154. The proposal provides the following cycle parking provision:

No. of units	Short stay spaces	Long stay spaces	Cycle hire spaces	Total no. of cycle parking spaces
39	12	75	0	87

155. Transport Policy have confirmed that the cycle parking layout is in accordance with London Plan Policy T5. 5% of spaces are provided in a larger format suitable and appear compliant with guidance, as such these plans should be secured via a compliance condition.

156. In relation to the cycle store access, the applicant has submitted a statement regarding the right of access between the public footway/highways and the rear cycle store. This is considered sufficient for the purposes of this planning application.

Refuse and Recycling

157. The applicant has submitted updated refuse storage plans which have been approved by the Council's Highways and Transport Policy department. They accord with the Waste Management Guidelines and provide a sufficient refuse collection point. These plans are to be conditioned to ensure compliance.

Parking Permits, Car Parking and Car Club

158. As per Southwark Plan Policy P54, on-street parking permits will not be available for residents or businesses in current or future CPZs. Transport Policy support that the Transport Assessment notes that the permit-free arrangement will be made clear to all residents prior to purchase/ occupation. As the site is in PTAL 5, the proposed car-free development is acceptable.

159. The originally submitted proposal includes a Blue Badge Bay in accordance with London Plan Policy T6.1 H(5) and Southwark Plan Policy P55. However, the positioning and design raise several concerns regarding access and safety. The required pedestrian sightlines (1.5m x 1.5m) and vehicular sightlines (2.4m x 25m), cannot be achieved due to the bay being positioned parallel to the building line and the proposed new crossover would be located adjacent to existing on-street parking, meaning access to and from the bay cannot be guaranteed. A re-design of the Blue Badge bay was initially requested so that vehicles can enter and exit at 90 degrees to the back edge of the footway, thereby achieving the required pedestrian and vehicular sightlines in light of guaranteeing public and road safety. This would have necessitate a major

adjustment to the building line to accommodate the length of a vehicle. In line with MfS and DS.132, the crossover should not exceed 3m in width in protecting the quality of the pedestrian environment.

160. As such, following discussion with Officers, the applicant has removed the Blue Badge bay from the proposals, resulting in zero provision. This does not comply with London Plan Policy T6.1 H(5) or Southwark Plan Policy P55, which require a minimum of 3% provision.
161. The Transport Statement acknowledges that the applicant will be required to provide a minimum of 3 years free membership to one of the car club schemes in the area to the primary occupier of each unit (assuming they are eligible). The applicant will need to ensure that the agreement is with an alternative operator within the area rather than Zipcar, given they will be seizing operations from the end of December 2025.

Vehicle Access, Crossover and Pedestrian Access

162. In regard to the sightlines at Comber Grove junction, the applicant has confirmed that no new trees are proposed and that the existing brick wall between the site and Grenfell House will be retained. Vehicle and pedestrian sightlines will therefore remain unchanged.
163. The pedestrian access is proposed from the corner of the site between Comber Grove and Redcar Street. On the basis that the pedestrian access is a width of 1.2m and segregated from any areas with vehicular movement, the proposed pedestrian access appears to accord to Southwark Plan Policy P50/ P51.

Gradient and Site Levels

164. On the basis that the development can be delivered in line with existing highway levels, the gradient and site levels raise no objection from Transport Policy.

Trip Generation

165. The applicant has provided trip generation figures. Transport Policy welcome that the car-based trips align with the car-free status of the site. The assessment would appear robust given the range of comparable sites used to extract this trip rate from TRICS.

Delivery and Servicing

166. A loading bay is proposed on street adjacent to the site on Comber Grove. Given the site constraints, this is acceptable in principle. Although located near a junction, it is no closer than existing on street parking on Redcar Street. As the loading bay is on the public highway it would need to be secured through the S278 scope of works.

D/CEMP

167. A CEMP has been submitted in support of the application. Further details will be required within a more detailed CEMP, which will be secured by condition.
168. With regard to the principle of construction and demolition at this site, Transport Policy have concerns about how construction and demolition vehicles would access the site given the absence of an existing crossover. In addition, there are no loading bays in the immediate vicinity, which may necessitate the suspension of permit-holder parking. These concerns should be fully addressed within the submitted CEMP.
169. The full CEMP will need to include:
- A Traffic Management Plan;
 - Mapping of vehicle routing through the borough;
 - Clear demonstration of mitigation measures to ensure there are no adverse safety impacts for pedestrians, cyclists, or other road users during demolition and construction.

This document will also be subject to review by the Council's Network Management Team who are generally the deciding consultee on CEMPs.

Travel Plan

170. Transport Policy welcome that a Framework Travel Plan has been submitted and encourages more ambitious 5-year targets, particularly for cycling, to be explored for the full Travel Plan. Once the development reaches 50% occupancy, a full Travel Plan must be submitted, including a baseline mode share survey and 5-year targets. This has been included as a condition.

Section 278 and Highways

171. Highways have been consulted on the application. If consent is granted the developer must enter into an S278 agreement to complete the following works:
- Repave the footway including new kerbing fronting the development on Redcar Street and Comber Grove using precast concrete slabs and 150mm wide granite kerbs.
 - Reconstruct the turning radius to a tighter turn and upgrade the existing informal pedestrian crossing point to a raised table on Redcar Street junction with Comber Grove.
 - Upgrade existing speed hump on Comber Grove to a raised link table.
 - Upgrade street lighting to current LBS standards within the vicinity of the site.
 - Promote a Traffic Management Order to introduce a loading bay and remove existing double yellow lines on Comber Grove. Works to include road marking and signage.
 - Refresh all road markings following kerb installation.

- Repair any damage to the highway due to construction activities for the Development including construction work and the movement of construction vehicles.
172. The proposed building entrance and courtyard are partially located on the adopted highway. The Highway Authority has no objections for the strip of adopted footway to be stopped up. A stopping up order under Section 247 of the Town and Country Planning Act 1990 will be required should planning permission be granted.
173. From the Construction Management Plan, it is noted that a Construction Environmental Management Plan (CEMP) will be submitted to the Council for approval prior to the implementation of the Development. The CEMP should cover, but not limited to:
- Number of construction vehicles accessing the site per day
 - Largest vehicle deployed to access the site with swept path analysis
 - Any necessary protection measures to road users of the public highway
 - Demonstrate that there would be no obstruction to the public highway due to construction activities for the Development.
174. Prior to works commencing on site (including any demolition), a joint condition survey should be arranged with Southwark Highway Development Team to catalogue condition of streets and drainage gullies.

Section 106

175. The Section 106 will include:
- Section 278 Highways works as described above
 - Delivery and Servicing Management (DSP) monitoring and compliance fee (£2,790)
 - Travel Plan monitoring and compliance fee (£2,790)
 - Construction and Environmental Management Plan monitoring and compliance fee (£2,100 plus fee calculated on case-by-case basis).

Noise and vibration

176. The applicant has submitted a Noise Impact Assessment prepared by Hann Tucker Associates (Ref. 31460/NIA1, dated 9 July 2025). This has been reviewed by the Environmental Protection Team who have made the following comments.

Internal Noise, Ventilation and Plant Noise

177. Having reviewed the Noise Impact Assessment prepared by Hann Tucker Associates (Ref. 31460/NIA1, dated 9 July 2025) and to ensure compliance to its findings and recommendations, EPT recommend conditions relating to residential internal noise levels and plant noise.

178. With regards to ventilation, details relating to overheating have not yet been satisfied. The submitted Energy Statement (26/10/2025) provides energy/SAP information and general references to Part O but does not include TM52/TM59 dynamic thermal modelling, an ANC AVO (2020) assessment, or a secured mitigation scheme for a non-actively cooled scenario. In line with the project NIA (which indicates that the simplified Part O route is not suitable and that detailed modelling is required with closed window assumptions at night), applicants are required to supply a TM52/TM59 Overheating Addendum demonstrating compliance with Approved Document O and ANC AVO (2020), and setting out the room specific passive/low energy mitigation to be installed and permanently maintained. A condition relating to an updated overheating assessment has been included.

External Amenity

179. The proposed development proposes an external amenity space on the fifth floor (132.8 sq.m). This shall be conditioned for hours of use to ensure use is restricted to appropriate hours and would not cause a neighbouring amenity nuisance.

Energy and sustainability

180. Southwark Plan 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
 2. Be Clean – Low carbon energy supply
 3. Be Green – On site renewable energy production and storage
181. The application is supported by an Energy Statement by Focus360 dated 21st July 2025 version 1. The Council's Energy and Sustainability team have reviewed the submitted energy statement and GLA carbon emissions reporting spreadsheet and have made the following comments.

Be Lean

182. The proposed strategy has sought to maximise savings at the Be Lean stage of the energy hierarchy. A fabric-first approach has been adopted to minimise energy demand and reduce carbon emissions at source. The building fabric and airtightness levels exceed the minimum standards of Building Regulations Part L 2021, achieving a minimum 15% CO₂ reduction through passive design and energy efficiency measures alone. Key improvements include low U-values, high-performance glazing, reduced thermal bridging, and enhanced air permeability. These measures ensure the development meets energy performance targets and establishes a strong foundation for further carbon reductions under the energy hierarchy.

Be Clean

183. The development is not currently located within an area served by an existing district heating network, nor is there an active connection opportunity in the immediate vicinity at this time. However, in alignment with London Plan Policy SI 3 and Southwark Local Plan Policy P69, the scheme has been designed to be district heating ready. This includes the integration of suitable space within the plant room, compatible heating infrastructure, and provision for future pipework routes to allow for easy connection should a network become available. In the interim, the development will operate using highly efficient, independent heating systems that minimise carbon emissions. Further energy savings will be delivered through the renewable and low-carbon measures outlined in the 'Be Green' section of this report.

Be Green

184. To further reduce operational carbon emissions, the development incorporates a range of on-site renewable and low-carbon technologies. Air Source Heat Pumps (ASHPs) will provide space heating and hot water to all residential units, offering a highly efficient, low-emission alternative to traditional gas systems. In addition, roof-mounted photovoltaic (PV) panels will generate on-site renewable electricity, helping to offset regulated energy use and reduce grid dependency. These systems support the overall energy strategy by lowering the building's carbon footprint in line with London Plan and Southwark Local Plan policy objectives.

Conclusion on Energy and Sustainability matters

185. The scheme is designed in line with the 2021 uplift to the Building Regulations Part L (Conservation of Fuel and Power) and Part O (Overheating), which set minimum performance criteria for thermal efficiency, energy usage, and internal comfort. The key measures include; improved building fabric insulation values, low air permeability targets, high-efficiency services and heat recovery systems and overheating mitigation through external shading, ventilation, and thermal mass.
186. The Section 106 Legal Agreement will secure:
- The Section 106 planning obligation secures the requirements of the Energy Statement. Applicants will also need to provide the GLA Energy Assessment spreadsheet. 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.
 - Before occupation, design estimates for the London Plan's Be Seen energy performance indicators will need to be submitted. Annual in-use energy performance will be required 1 year after occupation and for the following 4 years.
 - Future proof DHN connection
 - Carbon shortfall (tonnes CO₂) × £95 per tonne × 30 years. The carbon offset contribution is: 12.7 tCO₂/yr x 30 yrs x 95 £/tCO₂ = £36,195.00. All the carbon offset contributions collected go into the Green Buildings Fund. This is used to fund carbon offsetting projects.

Biodiversity Net Gain and Ecology

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

Biodiversity Net Gain Applicable Sites

188. The proposed development does not fall within any of the BNG exemptions or any transitional arrangements and is therefore required to deliver BNG on site.
189. Planning authorities must take into account how the Biodiversity Gain Hierarchy (set out in set out in Articles 37A and 37D of the Town and Country Planning (Development Management Procedure) (England) Order 2015) has been applied and, if it has not been applied, the reason or absence of a reason when determining the application.
190. The Biodiversity Gain hierarchy sets out a list of priority actions:
- first, in relation to onsite habitats which have a medium, high and very high distinctiveness, the avoidance of adverse effects from the development and, if they cannot be avoided, the mitigation of those effects; and
 - then, in relation to all onsite habitats which are adversely affected by the development, the effect should be compensated by prioritising the enhancement of existing onsite habitats, creation of new onsite habitats, allocation of registered offsite gains and finally the purchase of biodiversity credits.

Onsite BNG

191. The draft Biodiversity Report submitted by the applicant has stated that the mandatory 10% BNG can be achieved onsite. This is in accordance with the Biodiversity Hierarchy.

Significant or non-significant BNG assessment

192. Planning regulations require an assessment of whether the proposed habitat works to deliver biodiversity net gain onsite will deliver a significant increase in the biodiversity value of the site, compared to the pre-development biodiversity value. The distinctiveness, condition and size of the biodiversity habitat to be delivered are all considerations which must be balanced.
193. Non-significant enhancements are habitat enhancements whose loss will not significantly decrease the development's biodiversity value.
194. Government guidance (PPG Biodiversity, 2024) on determining whether BNG to be delivered on a development site is 'significant' sets out five factors. These are set out below and the following assessment has been undertaken by the Council's ecologist to determine whether the development is significant or non-significant.

195.

Government Guidance on Significance; Does the proposed habitat delivered contain;	Assessment
Habitats of medium or higher distinctiveness in the biodiversity metric.	The following area based habitats are being created which have a distinctiveness of medium: Urban trees and mixed scrub
Habitats of low distinctiveness which create a large number of biodiversity units relative to the biodiversity value of the site before development.	The very low distinctiveness habitat non-native and ornamental hedgerow is proposed to deliver 0.101 hedgerow 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.	Of a total site area of 0.11ha, 0.012ha of Urban trees are proposed.
Enhancements to habitat condition e.g. from poor or moderate to good.	N/A

Significant BNG conclusion

196. The BNG to be provided as part of this development is considered to be significant as set out in the above table. A S106 legal agreement will be required to secure the biodiversity gain for 30 years. A monitoring fee will be required as part of the S106 agreement to cover the cost of periodic monitoring over 30 years. A Biodiversity Net Gain Plan and Habitat and Management and Monitoring Plan will be required post-approval to set out the management arrangements. These requirements have been included within the Heads of Terms below.
197. The proposed development is also required to be in accordance with Policy P60 of the Southwark Plan (2022). The Council's Ecologist has reviewed the submitted documents and has recommended conditions relating to bat and bird boxes, invertebrate enhancements, wildlife friendly lighting and hedgehogs to be included on the decision notice.

Air quality and External Lighting

198. The Council's Environmental Protection Team have reviewed the submitted Air

Quality Assessment ' 56'60 Comber Grove, Camberwell (GEM Air Quality Ltd, Report Ref. AQ2637, September 2025). An informative is recommended to ensure the development shall demonstrate full compliance with the air quality mitigation and management measures set out in the Air Quality Assessment ' 56'60 Comber Grove, Camberwell (GEM Air Quality Ltd, Report Ref. AQ2637, September 2025), specifically the construction dust risk mitigation and site controls described in Section 5.1 and Table 18 (Mitigation of Construction Activities). These measures shall be incorporated on the Demolition and Construction Environmental Management Plan (DCEMP).

Artificial Lighting

199. Any external lighting system installed at the development shall comply with the Institute of Lighting Professionals (ILE) Guidance Note 1 for the reduction of obtrusive light (2021). Details of any external lighting (including design; power and position of luminaries; light intensity contours) of all affected external areas (including areas beyond the boundary of the development) have been included as a condition.

Ground conditions and contamination

200. The Council's Environmental Protection team have been consulted on the application and have made the following comments with regards to ground conditions and contamination.
201. The application is supported by a Phase 1 Contamination Risk Assessment (GEI, Ref. 25-984, Oct 2025) which has been reviewed. A contaminated land condition and Unexploded Ordnance (UXO) condition is recommended and has been attached.

Water resources and Flood Risk

202. The applicant has submitted a Flood Risk Assessment and Sustainable Drainage Strategy by MTC engineering dated October 2025 and an addendum note by GHBullard & Associates LLP dated 16th March 2026.
203. The NPPF 2024 states that planning decisions must take into account the current and long-term implications for flood risk in order to minimise the vulnerability of communities and improve resilience. Where development is necessary in higher risk areas, development should be made safe for its lifetime without increasing flood risk elsewhere. Certain steps need to be followed when reaching a planning decision on development in higher risk areas, with risks managed through suitable adaptation measures. The advice of flood risk management authorities also needs to be taken into account (NPPF, 166).
204. The Environment Agency have been consulted on this application and have raised no objection. They have made the following comments. The site is in Flood Zone 3 and is located within an area benefitting from flood defences. Whilst the site is protected by the River Thames tidal flood defences up to a 1 in 1000 (0.1%) chance in any year, our most recent flood modelling (December

2017) shows that the site is not at risk if there were to be a breach in the defences. Therefore, the EA consider that the development will be at low risk of flooding.

205. The Lead Local Flood Authority (LLFA) have been consulted on the application and have reviewed the submitted drainage strategy. Following revisions of the strategy, they have confirmed the submitted revised document is acceptable and has recommended conditions. These have been included.

Sequential Test

206. The submitted documents confirm that site is situation in Flood Zone 3a and in accordance with the NPPF, this development is classified as a “more vulnerable” development. Due to the flood risk classification, a Sequential Test may be required in some circumstances, however Paragraph 175 of the NPPF states that:

“The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk).”

As detailed within the FRA and also within the EA’s response, the flood risk to the site from any source of flooding is actually considered to be low, and the site lies outside of any potential breach event modelled by the EA that could realistically occur, even with climate change allowance included and is not at any significant risk of flooding from any other source. A sequential test is therefore not required under paragraph 175 of the NPPF.

Exceptions Test

207. Paragraph 178 of the NPPF states that:

The application of the exception test should be informed by a strategic or site-specific flood risk assessment, depending on whether it is being applied during plan production or at the application stage.

To pass the exception test it should be demonstrated that:

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

208. In terms of the Exception Test, the first part of the Exception test is considered passed on the basis that the proposed development will regenerate an existing

brownfield site and provide additional residential accommodation that is much needed in the area, which will provide wider sustainability benefits that clearly outweigh the risk of flooding at the site given that it has been demonstrated to be low despite the Flood Zone 3a location. The second part of the Exception Test is considered to be passed as this FRA demonstrates that the development will be safe for its lifetime.

209. The proposed development is therefore compliant with the NPPF, Policy P68 (Reducing flood risk) of the Southwark Plan (2022) and Policy SI 12 (Flood Risk Management) and Policy SI 13 (Sustainable drainage) of the London Plan (2021).

Archaeology

210. The Council's archaeological officer was consulted on this application and confirmed that no archaeological response is necessary for this application.

Planning obligations (S.106 agreement)

211. The proposal is considered to be acceptable in accordance with Policy P1 'Social rented and intermediate housing' and Policy 1P3 'Community Infrastructure Levy (CIL) and Section 106 Planning Obligations', subject to the applicants entering into a Section 106 Legal Agreement to secure the required affordable housing contribution that is outlined in the table enclosed below.

212.	Planning obligation	Mitigation	Applicant's position
	Social Infrastructure		
	Adjacent ball court	£42,700 to support on-going maintenance of adjacent ball court for a 10-year period.	Agreed.
	Local Economy and Workspace		
	Local economy: Loss of employment floor space	A financial contribution equivalent to 10% of the number of FTE jobs displaced × £5,500 per job must be secured. Financial contribution of £6,549 , subject to indexation.	Agreed.
	Housing, Viability and Amenity Space		

Affordable (social rent and intermediate) housing Provision		Social rented	Shared ownership	Agreed.
	No. hab rooms	29	18	
	%	25%	15%	
	Total	47		
Children's play space	In accordance with London Plan Policy, as the child bed space number exceeds 10 then 10 sq.m per children's bed space should be provided. The calculation is as follows: 10.41 x 10 sq.m = 104 sq.m As this cannot be provided on site, a financial contribution has been sought. 104 sq.m x £325 = £33,832.50.			Agreed.
Transport and Highways				
Highway works	If consent is granted the developer must enter into an S278 agreement to complete the following works: • Repave the footway including new kerbing fronting the development on Redcar Street and Comber Grove using precast concrete slabs and 150mm wide granite kerbs. • Reconstruct the turning radius to a tighter turn and upgrade the existing informal pedestrian crossing point to a raised table on Redcar Street junction with Comber Grove. • Upgrade existing speed hump on Comber Grove to a raised link table.			Agreed.

	• Upgrade street lighting to current LBS standards within the vicinity of the site. • Promote a Traffic Management Order to introduce a loading bay and remove existing double yellow lines on Comber Grove. Works to include road marking and signage. • Refresh all road markings following kerb installation. • Repair any damage to the highway due to construction activities for the Development including construction work and the movement of construction vehicles.	
DSMP, Travel Plan and CEMP monitoring fee	Delivery & Servicing Management Plan • £2,790 monitoring fee Travel Plan • £2,790 monitoring fee Construction & Environmental Management Plan (CEMP) • £2,100 monitoring fee	Agreed.
Car club scheme	The applicant will be required to provide a minimum of 3 years free membership to one of the car club schemes in the area to the primary occupier of each unit (assuming they are eligible). The applicant will need to ensure that the agreement is with an alternative operator within the area rather than Zipcar, given they will be seizing operations from the end of December 2025.	Agreed.
Parking permit	No parking permits in current or	Agreed.

restriction	future CPZs.	
Energy, Sustainability and the Environment		
Energy provisions and connection to (or futureproofing for connection to) district CHP	• 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 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. • Before occupation, design estimates for the London Plan's Be Seen energy performance indicators will need to be submitted¹. Annual in-use energy performance will be required 1 year after occupation and for the following 4 years. • Future proof DHN connection	Agreed.
Carbon offset fund	Carbon shortfall (tonnes CO₂) × £95 per tonne × 30 years The carbon offset contribution is: 12.7 tCO₂/yr x 30 yrs x 95 £/tCO₂ = £36,195 All the carbon offset contributions collected go into the Green Buildings Fund. This is used to fund carbon offsetting projects.	Agreed.

Biodiversity Net Gain monitoring fee (significant)	£12,874	Agreed.
Section 106 administration & compliance fee	£5,000 – small-scale major application	Agreed.

213. In the event that the legal agreement is not completed by 22 January 2027 it is recommended that the Director of Planning be directed to refuse planning permission on the following grounds;
214. In the absence of a signed legal agreement, the proposal would fail to provide suitable mitigation in terms of planning gain contrary to policies DF1 'Delivery of the Plan and Planning Obligations' of the London Plan (2022), Policy P1 'Social rented and intermediate housing' and Policy 1P3 'Community Infrastructure Levy (CIL) and Section 106 Planning Obligations' of the Southwark Plan (2022) and the Southwark 'Section 106 Planning Obligations and Community Infrastructure Levy SPD' (2015).

Mayoral and borough community infrastructure levy (CIL)

215. Since the proposed development comprises dwellings, it will be a CIL chargeable development. The site is located within Southwark CIL Zone 3 and MCIL2 Band 2 Zone. Based on GIA from CIL Form1 dated 30-Oct-25, the amount of CIL is approximately £275.8k (net of £225.7k of CIL relief), consisting of £136.5kk of Mayoral CIL and £139.3k of Borough CIL. In the event valid evidence of the existing building has been occupied for its lawful use, then CIL is reduced to circa £202k (net of relief). It should be noted that this is an estimate subject to change, and the floor areas on approved drawings and in-use building criteria will be checked, after planning approval has been obtained.

Community involvement and engagement

216. As a major planning application, the application must be supported by development consultation charter documents. An engagement summary and an equalities impact assessment is required for this scheme. Both of these documents have been provided by the applicant. An assessment of the EQIA is provided under the Community impact and equalities assessment section of this report.
217. A statement of community involvement dated October 2025 and separate engagement summary has been provided by the applicant. The engagement summary specifically clearly sets out how feedback has been addressed in the final proposals.
218. As part of the community involvement process, more than 1,000 residents were contacted. Feedback has been secured via a dedicated consultation website, an in-person public exhibition and online briefings. Details of the community

engagement is provided below:

- Public consultation took place between June and August 2025
- 1,000 leaflets were posted to local residents before the consultation period. These leaflets contained a site location plan, contact details, information about how to provide feedback and an invitation to the in-person consultation workshop.
- A dedicated email address was published and available to residents to participate in the consultation and share their views
- A website was created which provided details on the scheme, including CGI images.
- An in-person exhibition event was held on Wednesday 16th July 2025 between 3-7.30pm to provide suitable opportunity for all members of the community to attend.
- During the consultation process, it was raised that the design was 'too lumpy' and since the consultation period the overall massing has been reduced.

In summary, Officers are satisfied that a high level of public engagement has been undertaken prior to the submission of the planning application and the requirements of the Development Consultation Charter has been suitably undertaken.

Consultation responses from members of the public and local groups

219. Summarised below are the material planning considerations raised by members of the public. 6 letters of representation have been received, with one address providing 3 sets of comments, taking the total number of comments received to 8.

220. Principle of development and proposed land uses:

- This development's design and density are not in keeping with the surrounding neighbourhood.
- A provision of any development should include both an affordable housing and a proper community contribution in keeping with the building's former use.
- I think this proposed development is quite out of keeping with the character of the local area. It is too massive and too high.
- Additionally, there is no community provision to replace the Hollington Boys club. The development adds nothing to the area for the local community and is only to its detriment.
- The proposal represents an overdevelopment of a constrained corner site, resulting in a building that is overly bulky, visually dominant and harmful to local character.
- The permanent loss of the former Hollington Club and its community function is not adequately justified or mitigated.
- No mention is made of any measures to replace, let alone enhance, the provision of community facilities addressing social issues in this area.
- The alternative community and sports facilities listed show a complete lack of

understanding of the local community who will not feel comfortable travelling to access facilities on other estates or neighbourhoods.

- The site previously operated as a community centre, providing a clear social benefit to local residents. The proposed development makes no meaningful attempt to replace or compensate for the loss of this valued community facility. This represents a net loss to the area and runs counter to planning principles that seek to protect and enhance community infrastructure.

Officer Comment: The proposed development includes a policy compliant amount of affordable housing. The loss of the vacant and closed down community facility has been assessed within the report. The proposal makes a significant contribution to the adjacent ball court with regards to maintenance for a 10 year period. This can be found within the s106 obligations.

221. Affordable housing and viability:

- Since around half of the former council homes on the Comber Estate have been lost through Right to Buy, there has been a forced exodus of families from the area, as evidenced by the closure of Comber Grove school in summer 2024 due to falling pupil rolls. It is only social rent housing, and more specifically council housing, that will address this. Shared ownership and limited discounts on market rents do not provide effective solutions.

Officer Comment: The proposed development provides social rent housing.

222. Design quality and site layout:

- The architectural form and materials fail to respect the established character of the Comber Grove / Wyndham Estate area.
- The proposed blocky design is not coherent with the linear forms of the 4-storey terraces and 5-storey housing blocks in the area, with sash windows. In an effort to maximise the developer's returns the proposed design is too bulky and visually dominant on this corner site, inconsistent with local character.
- A building of this size and height is soulless, out of character with the existing buildings and will negatively impact the street scene and local amenities.

Officer Comment: The proposed development has gone through an extensive pre application process and is considered acceptable in terms of design quality and layout. The above Design and Heritage section is comprehensive in its assessment of the scheme.

223. Quality of accommodation and provision of private/communal outdoor space:

- On-site play space provision does not meet policy requirements and is inadequately justified.
- The existing amenity facilities need to be both protected and enhanced. The council should use planning gain to provide more outdoor activity facilities for the estate and local residents.

Officer Comment: The proposal provides sufficient outdoor amenity space and children's play space was originally proposed on the roof space however this was requested to be removed during the application process as it was not suitably located. In this instance a financial contribution has been sought and is appropriately justified. The proposal provides a financial contribution towards the adjacent ball court.

224. Neighbour amenity impacts:

- The massing close to boundaries will materially reduce light, outlook and privacy for existing residents.

Officer Comment: A Daylight and Sunlight report (neighbouring properties) has been submitted to support the application. A detailed assessment of neighbouring properties has been included in the relevant section above.

225. Transport, parking, highways, deliveries and servicing matters:

- The effect that this proposal will have on traffic and transport in the area as presented in this application is either not addressed or unreliably addressed.
- Development for 122 residents will put greatly increased pressure on the road infrastructure from deliveries, visitors, etc. The public transport network in the area is itself stretched with cuts to bus frequency, and this would be the only feasible transport method for many or most residents of the development.
- This area is very busy with several local schools and churches putting pressure on access and parking every day of the week.
- The "car-free" approach fails to reflect real-world parking and servicing pressures in this part of Southwark.
- Heavy reliance on car club provision is questionable given recent market instability.
- I have reviewed the Transport Statement and note that it offers no solution at all for accommodating the parking needs of 39 new flats. It assumes existing roads can absorb this demand, which is incorrect and shows no consideration for current pressures. Parking is already extremely limited, and this development will exacerbate congestion, particularly during peak periods when the community gathers for events such as religious services.

Officer Comment: The proposed development would result in a net increase of 39 dwellings on site. The transport implications have been fully assessed and conditions included. All developments within Southwark are car free due to the location within the CPZ.

226. Environmental impact during the construction phase (noise, dust and dirt etc.):

- Given the road layout and limited access points to Comber Grove, it is difficult to envisage how this could be achieved without massive inconvenience and potential decrease in road safety for a considerable period to area residents and users.
- This area is home to many people with mobility issues, who would be impacted for both the above reasons.
- Extended construction activity in such close proximity to homes would negatively affect residents' wellbeing through noise, dust, loss of amenity and

increased disturbance over a prolonged period, as well as raising safety and security concerns in an area that is currently quiet and residential in nature.

Officer Comment: It is acknowledged that there would be short term construction impacts as a result of the proposed development, however these would be temporary in nature. A CEMP has been included to ensure construction is in line with guidance and would have limited impact on neighbouring residents.

227. Energy and sustainability:

- Low carbon energy provision needs to be realistic in scale and not just box ticking. The inclusion of PV has the potential to contribute to Southwark's Climate Action Plan which notes that 78% of the borough's carbon emissions comes from our building and that the move from fossil fuels is vital (September 2025). The Future Homes Standard introduces a functional requirement for new homes. It is not clear from the proposals how this will be maximised within the constraints of the site.

Officer Comment: The application is supported by a comprehensive energy statement and GLA Carbon Emissions Spreadsheet which has been reviewed by the Council's Energy and Sustainability Officer. The s106 obligations include a carbon offset contribution and future proofed connection to the DHN.

228. Other matters:

- It has been impossible in the short window since 26 November to look closely at a 111-document submission. For this reason, the application process should be reopened for wider public consultation.
- There is persistent flooding in the surrounding area of this proposal, partially due to inadequate drains and sewers.
- The proposal underestimates cumulative pressure on sewage, drainage and local services.
- While the green roof and rainwater storage will make positive contributions to stormwater attenuation, the site lies in Flood Zone 3 and the area already experiences surface water flooding issues
- While the statutory requirement on wheelchair accessible accommodation is met, no mention is made of homes suitable for older residents with ambulant mobility or other health issues, despite the current consultations on housing for older people currently ongoing at Southwark Council.

Officer Comment: The application has been out for public consultation for the required 21-day period. The application is supported by a Flood Risk Assessment, which as a major planning application, has been reviewed by the LLFA and is considered acceptable with regards to SuDS. Conditions have been recommended accordingly.

229. These matters are addressed comprehensively in the relevant preceding parts of this report.

Consultation responses from internal consultees

230. Summarised below are the material planning considerations raised by internal and divisional consultees, along with the officer's response.

231. Design and Conservation Team:

- 1st comments received 05/01/2026: Seek amendments. The proposed height is respectful of the prevailing height of the nearby estate blocks. The form and massing relate positively to the neighbouring Grenfell House and Laing House and address the bend of the road properly. Although visible from Camberwell New Road, it will not appear overly dominant to the detriment of the setting of the listed and locally listed buildings. While the height, form and massing could be acceptable on urban design and conservation grounds and concerns are raised about the potential impact on the street tree on Redcar Street. Also, the plant and lift overruns should be accurately depicted in views.
- The architectural design is contemporary yet contextual, using robust brickwork and detailing that echoes the design of nearby estate blocks. The regular grid of windows and balconies, interplay of brick tones, ribbed textures, and white accents ensure a rhythmic facade with strong horizontality. There are nonetheless areas of improvements to be resolved at the application stage to achieve the high quality of design required by policies. The boundary treatment on the west elevation also requires further clarification.
- 2nd comments received 06/05/2026: Summary: Seek further amendments regarding detailed design and clarifications over drawing labels. This is a follow-up comment that focuses on the revisions received in April 2026. For a fulsome analysis and recommended conditions, please refer to the comment dated 05.01.2026.
- Full comments are provided in the Design and Conservation section above but to conclude, the detailed design of the parapets, north and west elevations, and the 3m boundary wall should be further refined. The following labels of the proposed elevations also require clarifications:
 - o Labels #12, 19, 23, 26, 27 are missing from the illustrations.
 - o Is label #8 a duplicate of #3?
- 3rd comments received 09/06/2026: The proposed height is respectful of the prevailing height of the nearby estate blocks. The form and massing relate positively to the neighbouring Grenfell House and Laing House and address the bend of the road properly. Although visible from Camberwell New Road, it will not appear overly dominant to the detriment of the setting of the listed and locally listed buildings.
- The architectural design is contemporary yet contextual, using robust brickwork and detailing that echoes the design of nearby estate blocks. The regular grid of windows and balconies, interplay of brick tones, ribbed textures, and white accents ensure a rhythmic facade with strong horizontality. Overall, the architecture as refined is considered to achieve a high standard of design as required by policies. The proposal is acceptable subject to conditions.

Officer Comment: Noted. Conditions included.

232. Transport Policy:

- 1st comments received 16/12/2025:
 - Evidence that the cycle parking layout and format are workable and compliant with adopted policy, enabling this to be secured by condition.
 - Confirmation that the applicant holds rights of access between the public footway/highway and the cycle store entrance at the rear.
 - Revised design of the Blue Badge bay, incorporating an EVCP and to ensure vehicles can enter and exit at 90 degrees to the footway edge and achieve the necessary pedestrian/ vehicular sightlines.
 - Clarification of how delivery and servicing trips will be accommodated by the proposals.
 - Submission of a Framework Travel Plan.
 - Gradients/ site levels drawings to demonstrate that the site can be delivered in line with existing highways levels.
 - Updated bin store plans including drag distances.
 - Demonstration that pedestrian and vehicular sightlines at the existing vehicle access to the rear car park on Comber Grove will not be compromised by the proposals.
- 2nd comments received 05/05/2026:
- Visitor cycle parking: Four Sheffield stands have been re-located to the front of the site near the main entrance on Comber Grove. Although two stands remain at the rear, this revised arrangement represents an improvement and is therefore acceptable.
- Cycle parking layout: The updated cycle store provides 75 long stay spaces, in accordance with London Plan Policy T5. 5% are provided in a larger format suitable for adapted/ cargo bikes, which is acceptable. Fully dimensioned drawings have been submitted and appear compliant with LCDS Chapter 8. These can therefore be secured by compliance condition.
- Cycle store access: While we note the applicant's statement that they have a right of access between the public footway/ highway and the rear cycle store, this must be confirmed through a written and signed agreement with the landowner. This is required to ensure that access cannot be lost in the future, including in the event of re-development of adjoining land.
- Blue Badge bay: The applicant has removed the Blue Badge bay from the proposals, resulting in zero provision.
- Delivery and servicing: A loading bay is now proposed on street adjacent to the site on Comber Grove. Given the site constraints, this is acceptable in principle. Although located near a junction, it is no closer than existing on street parking on Redcar Street. As the loading bay is on the public highway, please refer to LBS Highways for further comments, as it would need to be secured through the S278 scope of works.
- Travel Plan: We welcome that a Framework Travel Plan has now been submitted and have the following comments:

- The mode share figures on Page 14 must be updated to match those in the Transport Assessment.
We encourage more ambitious 5 year targets, particularly for cycling, as the current increase of 0.63% equates to fewer than one additional trip on a daily basis.
- As the site is car free, targets should focus on increasing active travel (walking and cycling).
- Note that once the development reaches 50% occupancy, a full Travel Plan must be submitted, including a baseline mode share survey and 5 year targets.
- Gradients and levels: On the basis that the development can be delivered in line with existing highway levels, we have no further comments.
- Refuse and recycling: The updated refuse plan shows the store entrance is 9m from the point where a refuse vehicle would stop which accords to Southwark's Waste Management Guidance. While loading from a junction would not be supported, the refuse store is in the most appropriate location within the building, and we have no further comments on drag distance. However, the bin store door is 1.5m wide, whereas a minimum of 2m is required for ease of access on collection days. Please consider whether the entrance can be widened slightly.
- Sightlines at Comber Grove junction: The applicant has confirmed that no new trees are proposed and that the existing brick wall between the site and Grenfell House will be retained. Vehicle and pedestrian sightlines will therefore remain unchanged. We have no further comments.

Officer Comment: Noted. Conditions included. Officers are satisfied with the access to the cycle storage to the rear.

233. Environmental Protection Team:

- No objection subject to conditions relating to residential internal noise levels, plant noise, air quality, ventilation, artificial lighting, land contamination, unexploded ordnance and DCEMP.

Officer Comment: Noted. Conditions included.

234. Highways:

- 1st comments received 17/02/2026: Requested an effective footway width of 2.4 on Redcar Street and Comber Grove, Highway Authority has no objections to strip of adopted footway to be stopped up and a Section 247 order would be required, alignment of disabled parking bay should be amended to ensure safe entry and exit and visibility splays are required. Section 278 works are required to be secured.
- 2nd comments received 12/05/2026:

- Highways does not support the proposed refuse collection point as it is located at the junction of Redcar Street, Comber Grove and Badsworth Road. Stopping opposite or within 10 metres of a junction is generally not acceptable as this contradicts rule 243 of the Highway Code. Applicant to consider utilising the proposed loading bay for refuse collection. By swapping the refuse collection point with the cycle stands, the drag distance from the bin store could be reduced and ultimately avoid having refuse collection vehicles stopping at the junction.
- 3rd comments received 15/06/2026: Having looked at the revised ground floor plan, the access to the bin store has been swapped with the proposed cycle stands. This addresses the refuse bin drag distance highlighted earlier. In view of this, highways have no further comments to make on this application.

Officer Comment: Noted. Requested S278 works included within s106.

235. Urban Forester:

- 1st comments received 17/12/2025: AIA requires amendments to provide details on root development and % of RPA incursion, and how this will be mitigated prior to development.
- 2nd comments received 23/03/2026: A review of the amended information confirms that only fibrous roots were found in the one trench excavated. Although this does not rule out roots under the main structure, this would only impact foundation design rather than a reason for refusal as piles can be suitably sited to bridge structural roots. A details AMS which includes demolition details, scaffold extents, hoarding and piling mat placement is required by condition.

Officer comment: Condition included.

236. Ecology:

- 1st comments received 15/12/2025: The BNG metric should be completed with the post assessment tab filled in. Note the competency requirements for completing this are detailed in the BNG metric user guides. Appropriate condition assessment sheets should also be submitted. Details of how the biodiversity gain hierarchy has been considered should be included within a report along with the baseline and post development habitat maps. This could be appended to the submitted ecological report. Please reconsult when this is received.
- 2nd comments received 25/03/2026: Bat surveys as detailed within the ecological assessment are required before a decision can be made on this application. It is expected that these would be in the form of emergence surveys as the roost features are within the building, in line with the table on page 15 of the ecology assessment. The BNG metric seems to be missing the 'headline results page' and the 'results' page is blank. Please resubmit the metric to include these details.

- 3rd comments received 01/05/2026: The BNG report, metric and proposed ground floor plan do not appear to align. The BNG metric submitted has only recorded hardstanding as proposed habitats, whereas the report details hedgerow and grassland. The proposed ground floor plan appears to show trees/shrubbery. These three documents should align with each other.
- 4th comments received 12/06/2026: BNG significant. Conditions recommended for bird and bat boxes, hedgehogs, invertebrates, wildlife friendly lighting and standard significant BNG conditions. S106 obligation required.

Officer comment: Noted. BNG conditions and all ecology conditions have been added to the Decision Notice.

237. Archaeologist:

- No archaeological response is necessary for this application.

Officer Comment: Noted.

238. Local Economy:

- In general, the Local Economy team do not object in principle to the redevelopment of the site for residential use; however, we do note the complete loss of existing employment floorspace and therefore require appropriate financial mitigation contribution.
- The proposal results in the complete loss of the existing 911 sqm GIA of Class E(d) employment floorspace, with no reprovision of commercial or business space within the development.
- This policy applies directly, as all existing employment floorspace is being removed and no replacement workspace is proposed.
- As per P30, where employment floorspace is lost, a financial contribution equivalent to 10% of the number of FTE jobs displaced × £5,500 per job must be secured.
- LET's calculation of this contribution is set out in the obligations section.
- As a major development, the proposal is required to align with the Council's approach to supporting employment, skills and local procurement. However, based on the scale of development (total GEA < 5,000 sqm) and in accordance with LET's calculations, this scheme does not accrue any minimum construction-phase employment, apprenticeship or short-course output obligations.
- The development results in the loss of 911 sqm GIA of employment floorspace, with no reprovision.
- [Based on Section 106 Planning Obligations and Community Infrastructure Levy (CIL); Supplementary Planning Document (SPD); and the HCA employment densities guide].
- Financial contribution of **£6,549**, subject to indexation. This contribution must be secured in the s106 agreement.
- As there will be 1,000sqm or more of gross new floorspace, the applicant should allow local businesses to tender for the procurement of goods and

services generated by the development both during and after construction. We would welcome active steps to promote this.

Officer Comment: Noted and included within s106.

239. Planning Policy (Energy and Sustainability):

- 1st comments received 14/01/2026: GLA Carbon Emissions reporting spreadsheet required in Excel format, demonstrate the reduction in carbon emissions at each stage of the energy hierarchy, clarification required on future proofing District Heat Network connection, details of proposed heating system including ASHP models and SCOP values, details of PV panels, details of residual carbon emissions. S106 obligations and conditions required.
- 2nd comments received 22/04/2026: Revisions required to GLA Carbon Emissions spreadsheet to show savings at each stage of the energy hierarchy (Be Lean, Be Clean, Be Green) and Seasonal Coefficient of Performance (SCOP) used to calculate carbon emissions savings at the Be Green stage has not been provided.
- 3rd comments received 19/05/2026: The applicant has submitted the completed GLA carbon emissions spreadsheet and specified the development's SCOP for the ASHPs. No further action is required.

Officer Comment: Noted. All requested s106 obligations have been included.

240. Flood Risk Management Team:

- 1st comments received 19/12/2025:

Drainage hierarchy

- PASS – The application now proposes rainwater harvesting (roof system) and green infrastructure (green roofs plus rain gardens) along with permeable paving. Infiltration has been justifiably ruled out due to London Clay and low permeability. Discharge is to a combined sewer via hydrobrake at 1 l/s. Thames Water consent has been given, but a formal letter is still required. Raingardens should be confirmed and included in site drawings along with the design / biodiversity of the green roof.
- MORE INFORMATION REQUIRED – No biodiversity details have been provided for the green roof, as per Policy G5 (Urban Greening) of the Southwark Plan 2022.

Runoff rate

- PASS – Proposed runoff rate is 1.0 l/s, which is not equal to the greenfield rate but is justified due to a lower rate potentially leading to blockages.

Attenuation volume

- MORE INFORMATION REQUIRED – calculations which support the values given for the volume of attenuation required to achieve the proposed runoff rate have been provided. However, these should use FEH22 rainfall data to

indicate there is no flooding up to the 1:100 plus 40% Climate Change Event using the latest available data. Calculations for the 1 in 30-year event are also required, to demonstrate there is no flooding in such a storm event.

- **MORE INFORMATION REQUIRED** –A drawing showing exceedance routes should be provided.

Maintenance

- **FAIL** – The drainage strategy does not include maintenance tasks and frequencies for each SuDS component, although the maintenance owner has been identified (FRA review section).
- **DECISION:** Based on the above, we recommend that the application is not approved. The 'drainage hierarchy', 'attenuation volume' and 'maintenance' sections require more information.
- 2nd comments received 31/03/2026: The application has changed in the following way:
 - The applicant has included attenuation tanks within the site, increasing the attenuation storage to 119.61 m3 with the permeable paving.
 - Further information has been provided on the above outstanding matters.
 - We recommend **approval** of the application for the following reasons:
 - All outstanding matters have been addressed.

Officer comment: Noted. Condition included relating to SuDS.

241. Public Health:

- Public Health are supportive of the proposed development and reiterate their support for the commitment in the Equalities Impact Assessment (page 5) that as part of the s106 agreement the developer will provide a financial contribution to help maintain the new ball court after it has been installed by the Council.

Officer comment: Noted and s106 funds have been negotiated and agreed with the developer.

Consultation responses from external consultees

242. Summarised below are the material planning considerations raised by external consultees, along with the officer's response.

243. Thames Water:

- Piling condition recommended. Informatives suggested.

Officer Comment: Conditions and informatives included as requested.

244. Environment Agency:

- We have no objection to the proposed development as submitted.

Officer Comment: Noted.

245. HSE:

- HSE is the statutory consultee for planning applications that involve or may involve a relevant building. A relevant building is defined as: containing two or more dwellings or educational accommodation and is 18m or more in height or 7 or more storeys.
- This application does not appear to fall under the remit of planning gateway one because the height condition of a relevant building is not met.

Officer Comment: Noted.

246. Transport for London:

- The site of the proposed development lies away from Camberwell New Road, which forms part of the TLRN and there are no other TfL assets or services adjacent to the site and therefore TfL have no further comments to make on this planning application.

Officer Comment: Noted.

247. London Fire Brigade:

- No response received.

Officer Comment: Noted.

248. Metropolitan Police:

- No objection subject to Secured by Design accreditation condition.

Officer Comment: Noted, included.

249. These matters are addressed comprehensively in the relevant preceding parts of this report.

Community impact and equalities assessment

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

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

252. 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.

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

254. The application is supported by an Equalities Impact Assessment dated October 2025. This document has undertaken a full assessment of how the development could impact those with protected characteristics. The document outlines the benefits of the proposal would include providing 39 dwellings to meet the needs of the local community, including those with protected characteristics. In addition to this, the development would provide financial support via s106 obligations to maintain the adjacent ball court. The new ball court will cater to a wide range of the community, including young children, females and the elderly. The ball court markings will include games suitable for younger children, encouraging their use. However, it is noted that during the construction phase of the development there may be a disproportionate impact to those with protected characteristics. However, the document outlines that mitigation measures will be put in place to minimise disruption, including regular letter drops to provide advance warning to local residents to provide the option for them to be out of the house during these times. These works would be temporary in nature. In summary, the scheme would contribute to the housing need of the borough as well as making a CIL contribution. The Council has had due regard to the requirements of the PSED.

Human rights implications

255. This application has the legitimate aim of providing co-living units. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

Positive and proactive statement

256. The Council has published its development plan on its website together with advice about how applications are considered and the information that needs to

be submitted to ensure timely consideration of an application. Applicants are advised that planning law requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

257. The Council provides a pre-application advice service that is available to all applicants in order to assist applicants in formulating proposals that are in accordance with the development plan and submissions that are in accordance with the application requirements.

Positive and proactive engagement: summary table

Was the pre-application service used for this application?	Yes
If the pre-application service was used for this application, was the advice given followed?	Yes
Was the application validated promptly?	Yes
If necessary/appropriate, did the case officer seek amendments to the scheme to improve its prospects of achieving approval?	Yes
To help secure a timely decision, did the case officer submit their recommendation in advance of the statutory determination date?	Yes

CONCLUSION

258. The proposed development includes the demolition of the existing Old Hollingtonians Club which has been closed down for a number of years. The proposal includes the full redevelopment of the site to provide 39 dwellings (Use Class C3) in a six-storey building. The proposal includes appropriate landscaping at ground level and on the relevant roof areas as well as dedicated plant, refuse and cycle facilities at ground floor level. A lift is provided to upper floors.
259. The proposal would result in the loss of a community facility on site, however it has been demonstrated through marketing reports spanning a number of years since the facility has been vacant that no serious offers have been received and therefore the loss of the community facility is acceptable. The proposal provides 39 dwellings of that 40% affordable housing is provided on site, with a 25% split of social rented and shared ownership, in accordance with Policy P1 of the Southwark Plan (2022).
260. A contribution of £42,700 has been agreed towards a 10-year maintenance plan for the adjacent ball courts to ensure the community facility remains open and accessible for the surrounding residents. It is noted that the proposed six-storey building would result in a reduction to daylight at Grenfell House, Laing House and Moffatt House, however this is mostly due to the existing architecture (balconies) and positioning of the flank elevation on the boundary of the right of way and council owned estate road. Overall, the impact on neighbouring amenity is considered acceptable in this urban location.

261. The proposal provides high quality accommodation with good internal space standards and access to daylight. The architectural design is contemporary yet contextual, using robust brickwork and detailing that echoes the design of nearby estate blocks. The regular grid of windows and balconies, interplay of brick tones, ribbed textures, and white accents ensure a rhythmic facade with strong horizontality. Overall, the architecture as refined is considered to achieve a high standard of design as required by policies. The proposal is acceptable in terms of transport, highways, ecology, trees and sustainability impacts.
262. Subject to conditions and a Section 106 Agreement to secure the relevant planning obligations, planning permission is recommended to be granted.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Local Development Framework and Development Plan Documents	Environmental, 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 telephone: 0207 525 0254 Council website: www.southwark.gov.uk

APPENDICES

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

AUDIT TRAIL

Lead Officer	Stephen Platts, Director of Planning and Growth		
Report Author	Lara Sharpe, Team Leader		
Version	Final		
Dated	7 July 2026		
Key Decision	No		
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / EXECUTIVE MEMBER			
Officer Title	Comments Sought	Comments included	
Strategic Director, Resources	No	No	
Strategic Director, Environment, Sustainability and Leisure	No	No	
Strategic Director, Housing	No	No	
Date final report sent to Constitutional Team		13 July 2026	

APPENDIX 1

Recommendation

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

This document is not a decision notice for this application.

Applicant	Mr Nick Fairman Comber Grove Estates Ltd	Reg. Number	25/AP/3183
Application Type	Major application		
Recommendation	GRANT subject to Legal Agreement	Case Number	PP-14435435

Draft of Decision Notice

Grant subject to Legal Agreement for the following development:

Demolition of existing buildings and the redevelopment of the site to provide 39 dwellings (Use Class C3) in a six-storey building, along with associated landscaping, dedicated plant and storage facilities, and other associated works.

56-60 Comber Grove London Southwark SE5 0LD

In accordance with application received on 3 November 2025 and Applicant's Drawing Nos.:

SITE LOCATION PLAN 3463-ACA-XX-00-DR-A-100101 REV P1 received 03/11/2025

Existing Plans

Proposed Plans

PROPOSED SOUTH ELEVATIONS 3463-ACA-XX-XX-DR-A-210001_REV_P3
received 20/05/2026

PROPOSED NORTH ELEVATIONS 3463-ACA-XX-XX-DR-A-210002_REV_P3
received 20/05/2026

PROPOSED WEST ELEVATIONS 3463-ACA-XX-XX-DR-A-210003_REV_P3
received 20/05/2026

PROPOSED EAST ELEVATIONS 3463-ACA-XX-XX-DR-A-210004_REV_P3
received 20/05/2026

PROPOSED SW AND EAST ELEVATIONS 3463-ACA-XX-XX-DR-A-
210005_REV_P3 received 20/05/2026

PROPOSED WEST BOUNDARY ELEVATIONS 3463-ACA-XX-XX-DR-A-
210006_REV_P3 received 20/05/2026

PROPOSED GROUND FLOOR PLAN 3463-ACA-XX-00-DR-A-110110_REV_P3
received 27/05/2026

PROPOSED FIRST FLOOR PLAN 3463-ACA-XX-01-DR-A-110111_REV_P2
received 27/05/2026

PROPOSED SECOND FLOOR PLAN 3463-ACA-XX-02-DR-A-110112_REV_P2
received 27/05/2026

PROPOSED THIRD FLOOR PLAN 3463-ACA-XX-03-DR-A-110113_REV_P2
received 27/05/2026

PROPOSED FOURTH FLOOR PLAN 3463-ACA-XX-04-DR-A-110114_REV_P2
received 27/05/2026

PROPOSED FIFTH FLOOR PLAN 3463-ACA-XX-05-DR-A-110115_REV_P2
received 27/05/2026

Other Documents

FLAT TYPE 06 3463-ACA-XX-XX-DR-A-120-506 REV P1 received 03/11/2025

FLAT TYPE 21 3463-ACA-XX-05-DR-A-120521 REV P1 received 03/11/2025

FLAT TYPE 20 3463-ACA-XX-05-DR-A-120-520 REV P1 received 03/11/2025

FLAT TYPE 19 3463-ACA-XX-05-DR-A 120519 REV P1 received 03/11/2025

FLAT TYPE 18 3463-ACA-XX-05-DR-A-120518 REV P1 received 03/11/2025

FLAT TYPE 15 BEFORE ADAPTATION 3463-ACA-XX-04-DR-A-120524 REV P1
received 03/11/2025

FLAT TYPE 15 (WCH) 3463-ACA-XX-04-DR-A-120515 REV P1 received 03/11/2025

FLAT TYPE 14 3463-ACA-XX-04-DR-A-120514 REV P1 received 03/11/2025

FLAT TYPE 03 BEFORE ADAPTATION 3463-ACA-XX-00-DR-A-120522 REV P1
received 03/11/2025

FLAT TYPE 03 (WCH) 3463-ACA-XX-00-DR-A- 120503 REV P1 received 03/11/2025

FLAT TYPE 02 3463-ACA-XX-00-DR-A-120502 REV P1 received 03/11/2025

SOUTHWEST FACADE 3463-ACA-XX-XX-DR-A-720210 S3 .P1 received
08/12/2025

TENURE PLAN 3463-ACA-XX-XX-DR-A-151501_TENURE PLAN_P1 received
11/03/2026

FLAT TYPE 01 3463-ACA-XX-00-DR-A-120501_REV_P2 received 21/04/2026

FLAT TYPE 04 3463-ACA-XX-00-DR-A-120504_REV_P2 received 21/04/2026

ADOPTED HIGHWAYS AND 2.4M FOOTWAY PLAN 3463-ACA-XX-00-DR-A-
150301_L00 REV_P1 received 21/04/2026

FLAT TYPE 11 3463-ACA-XX-04-DR-A-120511_REV_P2 received 21/04/2026

FLAT TYPE 12 3463-ACA-XX-04-DR-A-120512_REV_P2 received 21/04/2026

FLAT TYPE 13 3463-ACA-XX-04-DR-A-120513_REV_P2 received 21/04/2026

FLAT TYPE 16 3463-ACA-XX-04-DR-A-120516_REV_P2 received 21/04/2026
 FLAT TYPE 17 3463-ACA-XX-04-DR-A-120517_REV_P2 received 21/04/2026
 FLAT TYPE 5 3463-ACA-XX-XX-DR-A-120505_REV_P2 received 21/04/2026
 FLAT TYPE 7 3463-ACA-XX-XX-DR-A-120507_REV_P2 received 21/04/2026
 FLAT TYPE 8 3463-ACA-XX-XX-DR-A-120508_REV_P2 received 21/04/2026
 FLAT TYPE 9 3463-ACA-XX-XX-DR-A-120509_REV_P2 received 21/04/2026
 FLAT TYPE 10 WCH 3463-ACA-XX-XX-DR-A-120510_REV_P2 received 21/04/2026
 FLAT TYPE 10 BEFORE ADAPTATION 3463-ACA-XX-XX-DR-A-120523_REV_P2
 received 21/04/2026
 PROPOSED BAY STUDY SOUTH WEST GROUND LEVEL BALCONY 3463-ACA-
 XX-XX-DR-A-720214_BAY STUDY - SW GROUND LEVEL BALCONY_P1 received
 21/04/2026
 PROPOSED BAY STUDIES - SOUTH FACADE 3463-ACA-XX-XX-DR-A-
 720213_BAY STUDIES - SOUTH FACADE_P2 received 21/04/2026
 BAY STUDIES - SW FACADE 3463-ACA-XX-XX-DR-A-720210_REV_P2 received
 20/05/2026
 BAY STUDIES - SE FACADE 3463-ACA-XX-XX-DR-A-720211_REV_P2 received
 20/05/2026
 PROPOSED ROOF PLAN 3463-ACA-XX-06-DR-A-110116_REV_P2 received
 27/05/2026
 PROPOSED GROUND FLOOR SITEWIDE PLANS 3463-ACA-XX-00-DR-A-
 110210_REV_P3 received 27/05/2026
 PROPOSED FIRST FLOOR SITEWIDE PLAN 3463-ACA-XX-01-DR-A-
 110211_REV_P2 received 27/05/2026
 PROPOSED SECOND FLOOR SITEWIDE PLAN 3463-ACA-XX-02-DR-A-
 110212_REV_P2 received 27/05/2026
 PROPOSED THIRD FLOOR SITEWIDE PLAN 3463-ACA-XX-03-DR-A-
 110213_REV_P2 received 27/05/2026
 PROPOSED FOURTH FLOOR SITEWIDE PLAN 3463-ACA-XX-04-DR-A-
 110214_REV_P2 received 27/05/2026
 PROPOSED FIFTH FLOOR SITEWIDE PLAN 3463-ACA-XX-05-DR-A-
 110215_REV_P2 received 27/05/2026
 PROPOSED ROOF PLAN 3463-ACA-XX-06-DR-A-110216_REV_P2 received
 27/05/2026
 PROPOSED GROUND FLOOR CYCLE STORE 3463-ACA-XX-00-DR-A-
 150101_REV_P3 received 27/05/2026
 PROPOSED GROUND FLOOR REFUSE STORAGE 3463-ACA-XX-00-DR-A-
 150102_REV_P2 received 27/05/2026
 ROOF UGF PLAN 3463-ACA-XX-06-DR-A-171116 REV P2 received 07/07/2026
 GROUND FLOOR UGF PLAN 3463-ACA-XX-00-DR-A-171110 REV P2 received
 07/07/2026
 MARKETING REPORT received 03/11/2025
 FIRE STATEMENT received 03/11/2025
 AIR QUALITY ASSESSMENT received 03/11/2025
 ECOLOGICAL IMPACT ASSESSMENT received 03/11/2025

PROTECTED SPECIES SURVEY received 03/11/2025
 LAND CONTAMINATION ASSESSMENT received 03/11/2025
 NOISE IMPACT ASSESSMENT received 03/11/2025
 CONSTRUCTION MANAGEMENT PLAN received 03/11/2025
 EQUALITIES IMPACT STATEMENT received 03/11/2025
 STATEMENT OF COMMUNITY INVOLVEMENT received 03/11/2025
 TREE SURVEY received 03/11/2025
 DAYLIGHT & SUNLIGHT ASSESSMENT (SURROUNDING PROPERTIES AND
 INTERNAL) received 03/11/2025
 TRANSPORT STATEMENT received 03/11/2025
 FLOOD RISK ASSESSMENT AND SUSTAINABLE DRAINAGE STRATEGY
 received 03/11/2025
 DELIVERY AND SERVICING MANAGEMENT PLAN received 03/11/2025
 'BE SEEN' REPORTING SPREADSHEET received 03/11/2025
 HERITAGE STATEMENT received 03/11/2025
 FIRE STATEMENT received 08/12/2025
 DESIGN AND ACCESS STATEMENT FULL VERSION received 16/02/2026
 ADDENDUM ARBORICULTURAL NOTE OUR REF: J54.79 received 10/03/2026
 ENGAGEMENT SUMMARY received 10/03/2026
 DAYLIGHT AND SUNLIGHT REPORT WITH FULL APPENDICES REV A received
 10/03/2026
 FRAMEWORK TRAVEL PLAN received 10/03/2026
 HABITAT CONDITION ASSESSMENT SHEETS MARCH 2026 received 11/03/2026
 FRA ADDENDUM DATED MARCH 2026 086/2026/002/JAH received 16/03/2026
 RESPONSE TO ISSUES LOG 25/03/2026 - ENERGY AND SUSTAINABILITY
 received 25/03/2026
 OVERHEATING ANALYSIS received 25/03/2026
 ENERGY STATEMENT V2 received 07/05/2026
 GLA CARBON EMISSIONS REPORTING SPREADSHEET received 07/05/2026
 BNG METRIC UPDATED MAY 2026 received 19/05/2026
 ELITE ECOLOGY NEW HABITAT MAP (MAY 2026) received 19/05/2026
 ELITE ECOLOGY BIODIVERSITY NET GAIN REPORT (MAY 2026) received
 19/05/2026

Time limit for implementing this permission and the approved plans

2. Three Year Time Limit

The development hereby permitted shall be begun before the end of three years from the date of this permission.

Reason:

As required by Section 91 of the Town and Country Planning Act (1990) as amended.

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

3. CEMP

No development shall take place, including any works of demolition, until a written CEMP has been submitted to and approved in writing by the Local Planning Authority. The CEMP shall oblige the applicant, developer and contractors to commit to current best practice with regard to construction site management and to use all best endeavours to minimise off-site impacts, and will include the following information:

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

To follow current best construction practice, including the following:

- Southwark Council's Technical Guide for Demolition & Construction at <https://www.southwark.gov.uk/construction>;
- Section 61 of Control of Pollution Act 1974;
- The London Mayors Supplementary Planning Guidance 'The Control of Dust and Emissions During Construction and Demolition';
- The Institute of Air Quality Management's 'Guidance on the Assessment of Dust from Demolition and Construction' and 'Guidance on Air Quality Monitoring in the Vicinity of Demolition and Construction Sites';
- BS 5228-1:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites. Noise';
- BS 5228-2:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites. Vibration';
- BS 7385-2:1993 Evaluation and measurement for vibration in buildings. Guide to damage levels from ground-borne vibration;
- BS 6472-1:2008 'Guide to evaluation of human exposure to vibration in buildings -

vibration sources other than blasting; and

- Relevant Stage emission standards to comply with Non-Road Mobile Machinery (Emission of Gaseous and Particulate Pollutants) Regulations 1999 as amended & NRMM London emission standards (<https://nrmm.london>).

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

Reason:

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

4. Sustainable Drainage Systems (SuDS)

No works (excluding demolition and site clearance) shall commence until full details of the proposed surface water drainage system incorporating Sustainable Drainage Systems (SuDS) have been submitted to and approved in writing by the Local Planning Authority, including detailed design, size and location of attenuation units and details of flow control measures. The strategy should achieve a reduction in surface water runoff rates during the 1% Annual Exceedance Probability (AEP) event plus climate change allowance, as detailed in the submitted FRA. The applicant must demonstrate that the site is safe in the event of blockage/failure of the system, including consideration of exceedance flows. The site drainage must be constructed to the approved details.

Reason:

To minimise the potential for the site to contribute to surface water flooding in accordance with Southwark's Strategic Flood Risk Assessment (2017) and Policy SI 13 of the London Plan (2021).

5. Biodiversity Gain Plan

The Biodiversity Gain Plan shall be prepared in accordance with the following document submitted as part of this planning application and hereby approved:

- BNG report by Elite Ecology dated May 2026
- BNG metric by Elite Ecology dated May 2026

Reason:

To ensure the development delivers a biodiversity net gain on site conforming to the details approved at planning application stage, in accordance with: Schedule 7A of the Town and Country Planning Act 1990; the National Planning Policy Framework 2024; Policies G1 (Green Infrastructure), G5 (Urban Greening), G6 (Biodiversity and Access to Nature), and SI 13 (Sustainable Drainage) of the London Plan 2021; and Policies P59 (Green Infrastructure) and P60 (Biodiversity) of the Southwark Plan 2022.

6. HMMP

Prior to the commencement of any development hereby consented (including any works of demolition and site clearance), a Habitat Management and Monitoring Plan (HMMP) prepared in accordance with the approved Biodiversity Gain Plan, shall be submitted to, and approved in writing by, the Local Planning Authority. The HMMP shall include:

- a non-technical summary;
- the roles and responsibilities of the people or organisation(s) delivering the HMMP
- the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;
- the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development;

And;

- the monitoring methodology and frequency in respect of the created or enhanced habitat to be submitted to the Local Planning Authority.

Reason:

To ensure the development delivers a biodiversity net gain on site conforming to the details approved at planning application stage, in accordance with: Schedule 7A of the Town and Country Planning Act 1990; the National Planning Policy Framework 2024; Policies G1 (Green Infrastructure), G5 (Urban Greening), G6 (Biodiversity and Access to Nature), and SI 13 (Sustainable Drainage) of the London Plan 2021; and Policies P59 (Green Infrastructure) and P60 (Biodiversity) of the Southwark Plan 2022.

7. Commencement of the HMMP

Prior to the commencement of the Habitat Management and Monitoring Plan (HMMP) works, the Local Planning Authority shall be notified in writing of the commencement.

Reason:

To ensure the development delivers a biodiversity net gain on site conforming to the details approved at planning application stage, in accordance with: Schedule 7A of the Town and Country Planning Act 1990; the National Planning Policy Framework 2024; Policies G1 (Green Infrastructure), G5 (Urban Greening), G6 (Biodiversity and Access

to Nature), and SI 13 (Sustainable Drainage) of the London Plan 2021; and Policies P59 (Green Infrastructure) and P60 (Biodiversity) of the Southwark Plan 2022.

8. Tree Protection

Prior to works commencing, including any demolition, an Arboricultural Method Statement shall be submitted to and approved in writing by the Local Planning Authority.

a) A pre-commencement meeting shall be arranged, the details of which shall be notified to the Local Planning Authority for agreement in writing prior to the meeting and prior to works commencing on site, including any demolition, changes to ground levels, pruning or tree removal.

b) A detailed Arboricultural Method Statement showing the means by which any retained trees on or directly adjacent to the site are to be protected from damage by demolition works, excavation, vehicles, stored or stacked building supplies, waste or other materials, and building plant, scaffolding or other equipment, shall then be submitted to and approved in writing by the Local Planning Authority. The method statements shall include details of facilitative pruning specifications and a supervision schedule overseen by an accredited arboricultural consultant.

c) Cross sections shall be provided to show surface and other changes to levels, special engineering, foundation or construction details and any proposed activity within root protection areas or the influencing distance (30m) of local trees required in order to facilitate demolition, construction and excavation.

The existing trees on or adjoining the site which are to be retained shall be protected and both the site and trees managed in accordance with the recommendations contained in the method statement. Following the pre-commencement meeting all tree protection measures shall be installed, carried out and retained throughout the period of the works, unless otherwise agreed in writing by the Local Planning Authority.

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

In any case, all works must adhere to BS5837: (2012) Trees in relation to demolition, design and construction and BS3998: (2010) Tree work - recommendations; BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf); EAS 01:2021 (EN) -Tree Pruning Standard; EAS 02:2022 (EN) - Tree Cabling/Bracing Standard; EAS 03:2022 (EN) - Tree Planting Standard. NHBC 4.2.13 Tables for Foundations Near Trees

Reason:

To avoid damage to the existing trees which represent an important visual amenity in the area, in accordance with The National Planning Policy Framework 2024 Parts, 8, 11, 12, 15 and 16; Policies G1 (Green Infrastructure, G5 (Urban Greening) and G7 (Trees and Woodlands) of the London Plan 2021); Policies G5 (Urban greening) and G7 (Trees and woodland) of the London Plan (2021); Policy P13 (Design of Places), Policy P56 (Protection of Amenity), Policy P57 (Open Space), Policy P60 (Biodiversity) and P61 (Trees) of the Southwark Plan (2022).

9. Unexploded Ordnance (UXO)

Prior to the commencement of any intrusive works, the developer shall commission a detailed UXO Desk Study and Risk Assessment, as the site lies within an area of moderate to high UXO/UXB potential (Phase 1 report, Section 5.4). Any mitigation and safe-working measures recommended by the UXO specialist shall be implemented in full prior to and during ground-breaking works.

Reason:

There is always the potential for unexpected contamination to be identified during development ground works. The Environment Agency and the Environmental Protection Team should be consulted should any contamination be identified, in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P64 (Contaminated land and hazardous substances), and the National Planning Policy Framework 2024.

10. Piling

No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the Local Planning Authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason:

To ensure adequate protection of water utility infrastructure in accordance with Policy P67 (Reducing water use) of the Southwark Plan (2022). The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure.

Please read the Thames Water guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures:

<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

Permission is subject to the following Grade Condition(s)

11. Detailed Drawings

Prior to the commencement of any above grade works (excluding demolition and archaeological investigation), detailed drawings (sections, elevations, plans at a scale of 1:5 or 1:10 as appropriate) of the following shall be submitted to the Local Planning Authority for approval in writing; the development shall not be carried out otherwise than in accordance with any such approval given.

- (i) decorative brickwork;
- (ii) balconies;
- (iii) parapets; and
- (iv) heads, cills and jambs of all openings.

Reason:

In order that the Local Planning Authority may be satisfied as to the quality of the design and details in accordance with the National Planning Policy Framework (2024); Policy D4 (Delivering good design) of the London Plan (2021); Policy P13 (Design of places) and Policy P14 (Design quality) of the Southwark Plan (2022).

12. Material Samples

Prior to above grade works commencing (excluding demolition and archaeological investigation), material samples/sample panels/sample-boards of all external facing materials to be used in the carrying out of this permission shall remain on site for inspection for the duration of the building's construction and approved in writing by the Local Planning Authority; the development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

In order to ensure that these samples will make an acceptable contextual response in terms of materials to be used, and achieve a quality of design and detailing in accordance with the National Planning Policy Framework (2024), Policy D4 (Delivering good design) of the London Plan (2021), Policy P13 (Design of places) and Policy P14 (Design quality) of the Southwark Plan (2022).

13. Bird Boxes

Details of three bird boxes shall be submitted to and approved in writing by the Local Planning Authority prior to any superstructure works commencing on site.

No less than two house sparrow terraces and one open fronted bird box shall be provided. Details shall include the exact location, specification and design of the bird boxes. The boxes shall be installed on mature trees or on buildings prior to the first occupation of the site.

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

Reason:

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

14. Bee Bricks

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

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

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

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

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

Reason:

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

15. Bat Boxes

(i) Details of bat tubes, bricks or boxes shall be submitted to and approved in writing by

the Local Planning Authority prior to any superstructure works commencing on site.

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

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

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

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

Reason:

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

16. Secured by Design

a) The development hereby permitted shall incorporate security measures to minimise the risk of crime and to meet the specific security needs of the development, in accordance with the principles and objectives of Secured by Design. Details of these measures shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of any above ground development and shall be implemented in accordance with the approved details prior to occupation.

b) Prior to first occupation of the development a satisfactory Secured by Design inspection must take place and the resulting Secured by Design certificate submitted to and approved in writing by the Local Planning Authority.

Reason:

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

17. Overheating

Prior to above grade works of the development hereby permitted, an updated overheating assessment and scheme of mitigation shall be submitted to the Local Planning Authority for approval in writing. This should provide TM52 modelling results reflecting the detailed design for a non-actively cooled scenario to demonstrate that passive measures are maximised to mitigate overheating and to assist in reducing active cooling demands as far as possible. The assessment shall demonstrate compliance with Building Regulations Approved Document O and the guidance in the Association of Noise Consultants' Acoustics, Ventilation and Overheating: Residential Design Guide (2020). Mitigation measures shall be installed as approved and permanently maintained thereafter.

Reason:

In order to ensure opportunities for reducing relying on active cooling have been maximised and increase resilience to climate change, and to comply with Southwark Plan 2022 policy P69 ('Sustainability standards') and London Plan Policy SI4 ('Managing Heat Risk') and to ensure that the occupiers and users of the development do not suffer a loss of amenity by reason of excess noise from environmental and transportation sources in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2024.

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

18. Residential Internal Noise Levels

Prior to first occupation, submit a Post-Completion Acoustic Validation Report confirming that the completed dwellings achieve the internal noise standards below, informed by the Noise Impact Assessment 'Hann Tucker Associates, Ref. 31460/NIA1, 9 July 2025.

Bedrooms - 35dB LAeq T', 30 dB L Aeq T*, 45dB LAFmax T *

Living and Dining rooms- 35dB LAeq T '

* - Night-time - 8 hours between 23:00-07:00

' - Daytime - 16 hours between 07:00-23:00

Standards must be met with windows closed, using the as-built ventilation strategy appropriate to the measured façade noise levels and the report's façade zone methodology.

The validation submission shall include measurement results for a representative sample of habitable rooms, as built schedules/specifications of glazing and ventilation, and photographs confirming installation. Where any unit does not comply, implement remedial works and re test until compliance is demonstrated. The approved scheme shall be implemented and permanently maintained thereafter.

Reason:

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

19. Delivery and Servicing Management Plan

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

Reason:

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

20. Completion and Monitoring of HMMP

(i) Before the first occupation of any part of the development hereby consented:

- the habitat creation and enhancement works set out in the approved Habitat Management and Monitoring Plan (HMMP) shall be completed; and
- a completion report evidencing the completed habitat enhancements shall be submitted to, and approved in writing by, the Local Planning Authority.

The created and/or enhanced habitat specified in the approved HMMP shall be managed and maintained in accordance with the approved Habitat Management and Monitoring Plan.

(ii) Biodiversity Net Gain Monitoring Reports shall be submitted to the Local Planning Authority in writing in accordance with the methodology and frequency specified in the approved Habitat Management and Monitoring Plan (HMMP).

(ii) Not until the final Biodiversity Net Gain Monitoring Report has been submitted to and approved in writing by the Local Planning Authority will this condition have been discharged in full.

Reason:

To ensure the development delivers a biodiversity net gain on site conforming to the details approved at planning application stage, in accordance with: Schedule 7A of the Town and Country Planning Act 1990; the National Planning Policy Framework 2024;

Policies G1 (Green Infrastructure), G5 (Urban Greening), G6 (Biodiversity and Access to Nature), and SI 13 (Sustainable Drainage) of the London Plan 2021; and Policies P59 (Green Infrastructure) and P60 (Biodiversity) of the Southwark Plan 2022.

21. Hedgehog Highways

Prior to first occupation, details of hedgehog access routes shall be submitted to and approved in writing by the Local Planning Authority. These details shall include:

- a) The location, number and design of hedgehog access gaps (minimum 13'cm × 13'cm) installed at the base of fences, walls or boundary treatments;
- b) Confirmation that all newly installed boundary treatments will either incorporate access gaps or be permeable to hedgehogs; and
- c) A plan showing the location of the access routes.

The development shall be carried out in full accordance with the approved details and the access gaps shall be retained permanently thereafter.

Reason:

To maintain and enhance habitat connectivity for hedgehogs, a priority species of principal importance under Section 41 of the NERC Act (2006), and in accordance with the National Planning Policy Framework and Policies G1, G5 and G6 of the London Plan (2021); and Policies P59 and P60 of the Southwark Plan (2022)

22. Wildlife Friendly Lighting

Prior to occupation, a lighting design strategy for biodiversity shall be submitted to and approved in writing by the Local Planning Authority. The strategy shall:

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

Reason:

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

23. Drainage Verification Report

No dwelling shall be occupied until a drainage verification report prepared by a suitably qualified engineer has been submitted to and approved in writing by the Local Planning Authority. The report shall provide evidence that the drainage system (incorporating SuDS) has been constructed according to the approved details and specifications (or detail any minor variations where relevant) and shall include plans, photographs and national grid references of key components of the drainage network such as surface water attenuation structures, flow control devices and outfalls. The report shall also include details of the responsible management company.

Reason:

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

Permission is subject to the following Compliance Condition(s)

24. Communal Outdoor Amenity Area

The communal outdoor amenity area on the fifth floor shall not be used, other than for maintenance, repair or means of escape, between the hours of 22:00 - 07:00.

Reason:

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance in accordance with the National Planning Policy Framework (2024); Policy P56 (Protection of amenity) and P66 (Reducing noise and enhancing soundscapes) of the Southwark Plan (2022).

25. Refuse Storage

Before the first occupation of the development hereby approved, the refuse storage arrangements (individuals bin stores, routes to bin stores, bin collection locations, levels and gradients to and from the store, bulky waste storage) as shown on the drawings hereby approved shall be provided and made available to the users of the development. Thereafter, such facilities shall be retained and maintained in perpetuity.

Reason:

To accord with Southwark's requirements for Waste Management and refuse collection arrangements (Waste Management Strategy Extension 2022 - 2025).

26. Cycle Storage

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

Reason:

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

Permission is subject to the following Special Condition(s)

27. Plant Noise

Prior to installation of any fixed mechanical plant, full details shall be submitted to and approved by the Local Planning Authority demonstrating that the plant will comply with the plant noise emission criteria identified in the Noise Impact Assessment by Hann Tucker Associates (Ref. 31460/NIA1, dated 9 July 2025).

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. The assessment shall show that plant noise levels at the nearest noise-sensitive façades do not exceed the Plant Noise Emission Criteria set out in Section 11 of the report. For the purposes of this condition the Background, Rating and Specific Sound levels shall be calculated fully in accordance with the methodology of BS4142:2014+A1:2019

A post-installation validation test shall be undertaken prior to first use of the plant, and the results submitted to the LPA confirming that the installed plant complies with the approved noise limits. All plant and associated acoustic treatments shall thereafter be retained and permanently maintained.

Reason:

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance or the local environment from noise creep due to plant and machinery in accordance with the National Planning Policy Framework (2024); Policy P56 (Protection of amenity) and Policy P66 (Reducing noise pollution and enhancing soundscapes) of the Southwark Plan (2022).

28. Contaminated Land

If, during development, contamination not previously identified at the site then no further

development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted, and obtained written approval from the Local Planning Authority for, a remediation strategy detailing how this unsuspected contamination shall be dealt with. The remediation strategy shall be implemented as approved, verified and reported to the satisfaction of the Local Planning Authority.

Reason:

There is always the potential for unexpected contamination to be identified during development ground works. The Environment Agency and the Environmental Protection Team should be consulted should any contamination be identified, in accordance with the National Planning Policy Framework (2024); Policy P56 (Protection of amenity) and Policy P64 (Contaminated land and hazardous substances) of the Southwark Plan (2022).

29. Travel Plan

a) Upon reaching 75% occupancy of the building, the applicant shall submit in writing and obtain the written approval of the Local Planning Authority to a Travel Plan written in accordance with TfL best guidance at the time of submission, including a baseline travel survey and setting out the proposed measures to be taken to encourage the use of modes of transport other than the car by all users of the building, including staff and visitors.

b) At the end of the first year of operation of the approved Travel Plan, a detailed survey showing the methods of transport used by all those users of the building to and from the site and how this compares with the proposed measures and any additional measures to be taken to encourage the use of public transport, walking and cycling to the site shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise in accordance with any such approval given.

c) At the end of the third year of operation of the approved Travel Plan a detailed survey showing the methods of transport used by all those users of the building to and from the site and how this compares with the proposed measures and any additional measures to be taken to encourage the use of public transport, walking and cycling to the site shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise in accordance with any such approval given.

d) At the end of the fifth year of operation of the approved Travel Plan a detailed survey showing the methods of transport used by all those users of the building to and from the site and how this compares with the proposed measures and any additional measures to be taken to encourage the use of public transport, walking and cycling to the site shall be submitted to and approved in writing by the Local Planning Authority and the

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

Reason:

In order that the use of non-car-based travel is encouraged in accordance with the National Planning Policy Framework (2024); Policy T6 (Car parking) of the London Plan (2021); Policy P54 (Car parking) of the Southwark Plan (2022).

30. External Lighting

Any external lighting system installed at the development shall comply with the Institute of Lighting Professionals (ILE) Guidance Note 1 for the reduction of obtrusive light (2021). Details of any external lighting (including design; power and position of luminaries; light intensity contours) of all affected external areas (including areas beyond the boundary of the development) shall be submitted to and approved by the Local Planning Authority in writing before any such lighting is installed. The development shall not be carried out otherwise than in accordance with any such approval given. Prior to the external lighting being used, a validation report shall be submitted to the LPA for approval in writing.

Reason:

In order that the Council may be satisfied as to the details of the development in the interest of the visual amenity of the area, the amenity and privacy of adjoining occupiers, and their protection from light nuisance, in accordance with the Southwark Plan 2022 Policy P16 (Designing out crime); Policy P56 (Protection of amenity), and the National Planning Policy Framework 2024.

Informatives

1. 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.

2. Air Quality

The development shall demonstrate full compliance with the air quality mitigation and management measures set out in the Air Quality Assessment ' 56'60 Comber Grove, Camberwell (GEM Air Quality Ltd, Report Ref. AQ2637, September 2025), specifically the construction dust risk mitigation and site controls described in Section 5.1 and Table 18 (Mitigation of Construction Activities). These measures shall be incorporated on the Demolition and Construction Environmental Management Plan (DCEMP).

3. Groundwater Risk Management Permit

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.

APPENDIX 2

Relevant Planning Policy

Planning policy

National Planning Policy Framework (the Framework) 2024

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

Paragraph 231 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications.

The relevant chapters from the Framework are:

- Chapter 2 Achieving sustainable development
- Chapter 5 Delivering a sufficient supply of homes
- Chapter 8 Promoting healthy and safe communities
- Chapter 9 Promoting sustainable transport
- Chapter 11 Making effective use of land
- Chapter 12 Achieving well-designed and beautiful places
- Chapter 14 Meeting the challenge of climate change, flooding and coastal change
- Chapter 15 Conserving and enhancing the natural environment
- Chapter 16 Conserving and enhancing the historic environment

The London Plan 2021

- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering good design
- Policy D5 Inclusive design
- Policy D6 Housing quality and standards
- Policy D7 Accessible housing
- Policy D8 Public realm
- Policy D12 Fire safety
- Policy D14 Noise
- Policy H1 Increasing housing supply
- Policy H4 Delivering affordable housing
- Policy H6 Affordable housing tenure
- Policy H9 Ensuring the best use of stock
- Policy H10 Housing size mix
- Policy S1 Developing London's social infrastructure

- Policy S3 Education and childcare facilities
- Policy S4 Play and informal recreation
- Policy S5 Sports and recreation facilities
- Policy HC1 Heritage conservation and growth
- Policy G5 Urban greening
- Policy G6 Biodiversity and access to nature
- Policy G7 Trees and woodlands
- Policy SI 1 Improving air quality
- Policy SI 3 Energy infrastructure
- Policy SI 5 Water infrastructure
- Policy SI 12 Flood risk management
- Policy SI 13 Sustainable drainage
- 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 T7 Deliveries, servicing and construction

Southwark Plan 2022

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

- P1 Social rented and intermediate housing
- P2 New family homes
- P8 Wheelchair accessible and adaptable housing
- P13 Design of places
- P14 Design quality
- P15 Residential design
- P16 Designing out crime
- P18 Efficient use of land
- P20 Conservation areas
- P21 Conservation of the historic environment and natural heritage
- P36 Development outside town centres
- P46 Leisure, arts and culture
- P47 Community uses
- P48 Hot food takeaways
- P49 Public transport
- P50 Highways impacts
- P51 Walking
- P53 Cycling
- P54 Car Parking
- P55 Parking standards for disabled people and the physically impaired
- P56 Protection of amenity
- P59 Green infrastructure
- P60 Biodiversity

- P61 Trees
- P65 Improving air quality
- P68 Reducing flood risk
- P69 Sustainability standards
- P70 Energy

Supplementary Planning Documents

Of relevance in the consideration of this application are:

- Affordable Housing SPD (2025)
- Section 160 and Community Infrastructure Levy SPD (2025)
- Climate and Environment SPD (2024)

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

No relevant planning history.

APPENDIX 4

Consultation undertaken

Site notice date: 26/11/2025

Press notice date: 04/12/2025

Case officer site visit date: 26/11/2025

Neighbour consultation letters sent: 26/11/2025

Internal consultees:

LBS Ecology Officer
 LBS Ecology Officer
 LBS Planning Policy - Energy
 LBS Design And Conservation Team [Formal Consultation]
 LBS Highways Development & Management
 LBS Ecology Officer
 LBS Design And Conservation Team [Formal Consultation]
 LBS Transport Policy Team
 LBS Highways Development & Management
 LBS Building Control Division
 LBS Community Infrastructure Team
 LBS Urban Forester
 LBS Planning Policy [Surgery]
 Flood Risk Management & Urban Drainage Team
 LBS Planning Policy [Formal Consultation] - General
 LBS Planning Policy - Energy
 LBS Transport Policy Team
 LBS Archaeologist
 LBS Design And Conservation Team [Formal Consultation]
 LBS Local Economy
 LBS Ecology Officer
 LBS Highways Development & Management
 Flood Risk Management & Urban Drainage Team
 LBS Urban Forester
 LBS Planning Policy [Formal Consultation] - General
 LBS Public Health
 LBS Waste Management Team
 LBS Ecology Officer
 LBS Environmental Protection Team

Statutory and non-statutory organisations consulted

Environment Agency
 London Fire & Emergency Planning Authority
 Natural England - London Region & South East Region
 Metropolitan Police Service (Designing Out Crime)
 Transport For London
 Thames Water
 Fire And Emergency Department
 HSE Fire Risk Assessments

Neighbour and local groups consulted:

Flat 12 Hayes Court Camberwell New Road
 263 Camberwell New Road London Southwark
 Flat 76 Laird House Comber Estate Redcar Street
 Flat 71 Laird House Comber Estate Redcar Street
 Flat 37 Laird House Comber Estate Redcar Street
 Flat 32 Laird House Comber Estate Redcar Street
 Flat 27 Laird House Comber Estate Redcar Street
 Flat 26 Laird House Comber Estate Redcar Street
 Flat 2 254 Camberwell New Road London
 Flat 75 Laird House Comber Estate Redcar Street
 Flat 74 Laird House Comber Estate Redcar Street
 Flat 66 Laird House Comber Estate Redcar Street
 Flat 60 Laird House Comber Estate Redcar Street
 Flat 59 Laird House Comber Estate Redcar Street
 Flat 57 Laird House Comber Estate Redcar Street
 Flat 56 Laird House Comber Estate Redcar Street
 Flat 45 Laird House Comber Estate Redcar Street

Flat 6 Laird House Comber Estate Redcar Street
 Flat 5 Laird House Comber Estate Redcar Street
 Flat 40 Laird House Comber Estate Redcar Street
 Flat 51 Laird House Comber Estate Redcar Street
 Flat 4 Laird House Comber Estate Redcar Street
 Flat 30 Laird House Comber Estate Redcar Street
 Flat 28 Laird House Comber Estate Redcar Street
 Flat 44 Laird House Comber Estate Redcar Street
 Flat 41 Laird House Comber Estate Redcar Street
 Flat 39 Laird House Comber Estate Redcar Street
 Flat 20 Laird House Comber Estate Redcar Street
 Flat 15 Laird House Comber Estate Redcar Street
 Flat 23 Laird House Comber Estate Redcar Street
 Flat 21 Laird House Comber Estate Redcar Street
 Flat 2 Laird House Comber Estate Redcar Street
 Flat 18 Laird House Comber Estate Redcar Street
 Flat 16 Laird House Comber Estate Redcar Street

Flat 10 Laird House Comber Estate
 Redcar Street
 Flat 22 Laird House Comber Estate
 Redcar Street
 Flat 17 Laird House Comber Estate
 Redcar Street
 14 Medlar Street London Southwark
 256 Camberwell New Road London
 Southwark
 259 Camberwell New Road London
 Southwark
 Flat 30 Moffat House Comber Estate
 Comber Grove
 Flat 26 Moffat House Comber Estate
 Comber Grove
 Flat 6 Moffat House Comber Estate
 Comber Grove
 Flat 28 Moffat House Comber Estate
 Comber Grove
 Flat 4 Marinel House Comber Estate
 Comber Grove
 Flat 19 Grenfell House Comber Estate
 Comber Grove
 Flat 21 Grenfell House Comber Estate
 Comber Grove
 Flat 14 Grenfell House Comber Estate
 Comber Grove
 Flat 12 Grenfell House Comber Estate
 Comber Grove
 Flat 28 Grenfell House Comber Estate
 Comber Grove
 Flat 25 Grenfell House Comber Estate
 Comber Grove
 Flat 17 Grenfell House Comber Estate
 Comber Grove
 10 Medlar Street London Southwark
 12 Medlar Street London Southwark
 258 Camberwell New Road London
 Southwark
 2 Medlar Street London Southwark
 3 Medlar Street London Southwark
 8 Hodister Close London Southwark
 11 Hodister Close London Southwark
 7 Medlar Street London Southwark
 6 Hodister Close London Southwark

10 Hodister Close London Southwark
 82 Laird House Comber Estate Redcar
 Street London
 Flat 80 Laird House Comber Estate
 Redcar Street
 Flat 26 Moules Court Wyndham Road
 12 Hodister Close London Southwark
 Flat 9 Grenfell House Comber Estate
 Comber Grove
 Flat 16 Grainger Court Redcar Street
 Flat 9 Laing House Comber Estate
 Comber Grove
 Flat 6 Hayes Court Camberwell New
 Road
 Flat 5 Hayes Court Camberwell New
 Road
 Flat 32 Hayes Court Camberwell New
 Road
 Flat 27 Hayes Court Camberwell New
 Road
 Flat 8 Finley Court Redcar Street
 2 Burwood Lodge Camberwell New
 Road London
 Flat 13 Laing House Comber Estate
 Comber Grove
 Flat 34 Moffat House Comber Estate
 Comber Grove
 Flat 22 Moffat House Comber Estate
 Comber Grove
 Flat 16 Moffat House Comber Estate
 Comber Grove
 Flat 12 Marinel House Comber Estate
 Comber Grove
 Flat 23 Arnot House Comber Estate
 Comber Grove
 Flat 78 Laird House Comber Estate
 Redcar Street
 Flat 28 Moules Court Wyndham Road
 Flat 10 Grainger Court Redcar Street
 283 Camberwell New Road London
 Southwark
 Flat 1 Finley Court Redcar Street
 Flat 30 Moules Court Wyndham Road
 Flat 23 Moules Court Wyndham Road
 4 Hodister Close London Southwark

Flat 9 Finley Court Redcar Street
 Flat 9 Arnot House Comber Estate
 Comber Grove
 272 Camberwell New Road London
 Southwark
 Flat 27 Moules Court Wyndham Road
 Flat 25 Moules Court Wyndham Road
 Flat 27 Moffat House Comber Estate
 Comber Grove
 Flat 17 Grainger Court Redcar Street
 Flat 7 Finley Court Redcar Street
 Flat 10 Finley Court Redcar Street
 Flat 19 Hayes Court Camberwell New
 Road
 Flat 14 Hayes Court Camberwell New
 Road
 Flat 20 Hayes Court Camberwell New
 Road
 Flat 16 Hayes Court Camberwell New
 Road
 Flat 28 Hayes Court Camberwell New
 Road
 Flat 24 Hayes Court Camberwell New
 Road
 Flat 20 Grenfell House Comber Estate
 Comber Grove
 Flat 13 Grenfell House Comber Estate
 Comber Grove
 Flat 19 Laing House Comber Estate
 Comber Grove
 Flat 5 Moffat House Comber Estate
 Comber Grove
 Flat 20 Marinel House Comber Estate
 Comber Grove
 264 Camberwell New Road London
 Southwark
 Flat 11 Marinel House Comber Estate
 Comber Grove
 Flat 8 Arnot House Comber Estate
 Comber Grove
 277 Camberwell New Road London
 Southwark
 Flat 5 Grenfell House Comber Estate
 Comber Grove
 Flat 5 Laing House Comber Estate

Comber Grove
 Flat 34 Laing House Comber Estate
 Comber Grove
 267 Camberwell New Road London
 Southwark
 Flat 22 Grenfell House Comber Estate
 Comber Grove
 Flat 5 Marinel House Comber Estate
 Comber Grove
 Flat 3 Marinel House Comber Estate
 Comber Grove
 Flat 16 Laing House Comber Estate
 Comber Grove
 Flat 1 Laing House Comber Estate
 Comber Grove
 Flat 31 Moffat House Comber Estate
 Comber Grove
 Flat 22 Laing House Comber Estate
 Comber Grove
 Flat 18 Arnot House Comber Estate
 Comber Grove
 Flat 11 Arnot House Comber Estate
 Comber Grove
 Flat 1 Arnot House Comber Estate
 Comber Grove
 Flat 5 Arnot House Comber Estate
 Comber Grove
 Flat 1 Marinel House Comber Estate
 Comber Grove
 Basement Flat 277 Camberwell New
 Road London
 289 Camberwell New Road London
 Southwark
 275 Camberwell New Road London
 Southwark
 Apartment 2 81 Comber Grove London
 Flat A 257 Camberwell New Road
 London
 First Floor And Second Floor Flat 287
 Camberwell New Road London
 Ground Floor Flat 11 Medlar Street
 London
 First Floor Flat 11 Medlar Street London
 Apartment 1 81 Comber Grove London
 Maisonette Second And Third Floor Flat

254 Camberwell New Road London	83 Comber Grove London Southwark
281 Camberwell New Road London	9 Hodister Close London Southwark
Southwark	89 Comber Grove London Southwark
274 Camberwell New Road London	252 Camberwell New Road London
Southwark	Southwark
Ground Floor Flat 254 Camberwell New	266 Camberwell New Road London
Road London	Southwark
Ground Floor Flat 287 Camberwell New	Flat 21 Laing House Comber Estate
Road London	Comber Grove
293A Camberwell New Road London	Ground Floor Flat 15 Medlar Street
Southwark	London
Flat 9 Hayes Court Camberwell New	Flat 17 Marinel House Comber Estate
Road	Comber Grove
Flat 21 Arnot House Comber Estate	Flat 24 Arnot House Comber Estate
Comber Grove	Comber Grove
260 Camberwell New Road London	Flat 11 Grenfell House Comber Estate
Southwark	Comber Grove
Flat 14 Marinel House Comber Estate	Flat 23 Laing House Comber Estate
Comber Grove	Comber Grove
Flat 14 Arnot House Comber Estate	Flat 7 Moffat House Comber Estate
Comber Grove	Comber Grove
Flat 6 Finley Court Redcar Street	Flat 35 Grenfell House Comber Estate
Flat 67 Laird House Comber Estate	Comber Grove
Redcar Street	Flat 18 Moffat House Comber Estate
Flat 24 Marinel House Comber Estate	Comber Grove
Comber Grove	Flat 18 Marinel House Comber Estate
Flat 13 Hayes Court Camberwell New	Comber Grove
Road	2 Hodister Close London Southwark
Flat 4 Moffat House Comber Estate	Flat 2 Laing House Comber Estate
Comber Grove	Comber Grove
Comber Grove Junior And Infant School	Flat 17 Laing House Comber Estate
Comber Grove London	Comber Grove
Flat 8 Moffat House Comber Estate	Flat 26 Laing House Comber Estate
Comber Grove	Comber Grove
Flat 7 Hayes Court Camberwell New	Flat 29 Laing House Comber Estate
Road	Comber Grove
Flat 22 Arnot House Comber Estate	Guardian Flat 56 - 60 Comber Grove
Comber Grove	London
Flat 20 Moffat House Comber Estate	14 Badsworth Road London Southwark
Comber Grove	27 Badsworth Road London Southwark
Flat 5 Grainger Court Redcar Street	28 Badsworth Road London Southwark
Flat 7 Grainger Court Redcar Street	24 Badsworth Road London Southwark
Flat 2 Grainger Court Redcar Street	26 Badsworth Road London Southwark
Flat 9 Grainger Court Redcar Street	25 Badsworth Road London Southwark
Flat 18 Grainger Court Redcar Street	22 Badsworth Road London Southwark

21 Badsworth Road London Southwark
 23 Badsworth Road London Southwark
 Basement 283 Camberwell New Road
 London
 Flat 77 Laird House Comber Estate
 Redcar Street
 Flat 28 Laing House Comber Estate
 Comber Grove
 Flat 33 Grenfell House Comber Estate
 Comber Grove
 Flat 15 Grenfell House Comber Estate
 Comber Grove
 Flat 21 Moffat House Comber Estate
 Comber Grove
 Flat 24 Laing House Comber Estate
 Comber Grove
 Flat 15 Marinel House Comber Estate
 Comber Grove
 Flat 32 Grenfell House Comber Estate
 Comber Grove
 Flat 35 Laing House Comber Estate
 Comber Grove
 Flat 8 Laing House Comber Estate
 Comber Grove
 Apartment 3 81 Comber Grove London
 Flat 8 Grainger Court Redcar Street
 Flat 6 Grainger Court Redcar Street
 Flat 3 Grenfell House Comber Estate
 Comber Grove
 Flat 4 Grenfell House Comber Estate
 Comber Grove
 Flat 34 Grenfell House Comber Estate
 Comber Grove
 Flat 2 Arnot House Comber Estate
 Comber Grove
 Flat 12 Arnot House Comber Estate
 Comber Grove
 Flat 4 Arnot House Comber Estate
 Comber Grove
 Flat 17 Arnot House Comber Estate
 Comber Grove
 14A Medlar Street London Southwark
 Flat 15 Arnot House Comber Estate
 Comber Grove
 Flat 10 Arnot House Comber Estate

Comber Grove
 261 Camberwell New Road London
 Southwark
 271 Camberwell New Road London
 Southwark
 Flat B 257 Camberwell New Road
 London
 17 Badsworth Road London Southwark
 15B Badsworth Road London Southwark
 20 Badsworth Road London Southwark
 19 Badsworth Road London Southwark
 18 Badsworth Road London Southwark
 16 Badsworth Road London Southwark
 15A Badsworth Road London Southwark
 Flat 79 Laird House Comber Estate
 Redcar Street
 Flat 72 Laird House Comber Estate
 Redcar Street
 Flat 62 Laird House Comber Estate
 Redcar Street
 Flat 50 Laird House Comber Estate
 Redcar Street
 Flat 9 Laird House Comber Estate
 Redcar Street
 Flat 52 Laird House Comber Estate
 Redcar Street
 Flat 61 Laird House Comber Estate
 Redcar Street
 Flat 58 Laird House Comber Estate
 Redcar Street
 Flat 53 Laird House Comber Estate
 Redcar Street
 Flat 49 Laird House Comber Estate
 Redcar Street
 Flat 46 Laird House Comber Estate
 Redcar Street
 Flat 42 Laird House Comber Estate
 Redcar Street
 Flat 7 Laird House Comber Estate
 Redcar Street
 Flat 35 Laird House Comber Estate
 Redcar Street
 Flat 14 Laird House Comber Estate
 Redcar Street
 Flat 19 Grainger Court Redcar Street

Flat 9 Moffat House Comber Estate Comber Grove	Road
Flat 3 Finley Court Redcar Street	Flat 15 Laing House Comber Estate Comber Grove
Flat 10 Marinel House Comber Estate Comber Grove	7 Hodister Close London Southwark
Flat 10 Grenfell House Comber Estate Comber Grove	Flat 23 Moffat House Comber Estate Comber Grove
Flat 10 Hayes Court Camberwell New Road	Flat 19 Marinel House Comber Estate Comber Grove
Flat 30 Hayes Court Camberwell New Road	15 Medlar Street London Southwark
Flat 18 Hayes Court Camberwell New Road	1 Burwood Lodge Camberwell New Road London
13 Hodister Close London Southwark	Flat 21 Hayes Court Camberwell New Road
13 Medlar Street London Southwark	1 Medlar Street London Southwark
Flat 31 Hayes Court Camberwell New Road	Flat 33 Hayes Court Camberwell New Road
Flat 14 Grainger Court Redcar Street	Flat 11 Grainger Court Redcar Street
Flat 1 Grainger Court Redcar Street	Flat 29 Grenfell House Comber Estate Comber Grove
Flat 5 Finley Court Redcar Street	Flat 32 Laing House Comber Estate Comber Grove
Flat 6 Grenfell House Comber Estate Comber Grove	Flat 31 Laing House Comber Estate Comber Grove
Flat 26 Grenfell House Comber Estate Comber Grove	Flat 3 Laing House Comber Estate Comber Grove
Flat 2 Grenfell House Comber Estate Comber Grove	5 Burwood Lodge Camberwell New Road London
Flat 27 Laing House Comber Estate Comber Grove	291 Camberwell New Road London Southwark
Flat 11 Hayes Court Camberwell New Road	Flat 14 Moffat House Comber Estate Comber Grove
293 Camberwell New Road London Southwark	Flat 7 Marinel House Comber Estate Comber Grove
Flat 11 Laing House Comber Estate Comber Grove	Flat 16 Marinel House Comber Estate Comber Grove
Flat 31 Laird House Comber Estate Redcar Street	270 Camberwell New Road London Southwark
Flat 8 Laird House Comber Estate Redcar Street	15A Medlar Street London Southwark
Flat 34 Laird House Comber Estate Redcar Street	Flat 68 Laird House Comber Estate Redcar Street
Flat 33 Laird House Comber Estate Redcar Street	Flat 64 Laird House Comber Estate Redcar Street
Flat 13 Laird House Comber Estate Redcar Street	Flat 54 Laird House Comber Estate Redcar Street
Flat 17 Hayes Court Camberwell New	Flat 38 Laird House Comber Estate

Redcar Street
 Flat 19 Laird House Comber Estate
 Redcar Street
 5 Hodister Close London Southwark
 Flat 12 Laing House Comber Estate
 Comber Grove
 Flat 7 Grenfell House Comber Estate
 Comber Grove
 8 Medlar Street London Southwark
 Flat 17 Moffat House Comber Estate
 Comber Grove
 Flat 10 Moffat House Comber Estate
 Comber Grove
 Flat 23 Marinel House Comber Estate
 Comber Grove
 Flat 21 Marinel House Comber Estate
 Comber Grove
 Flat 13 Marinel House Comber Estate
 Comber Grove
 Flat 6 Laing House Comber Estate
 Comber Grove
 Flat 30 Laing House Comber Estate
 Comber Grove
 Flat 15 Hayes Court Camberwell New Road
 5 Medlar Street London Southwark
 Flat 29 Moules Court Wyndham Road
 Flat 24 Moules Court Wyndham Road
 Flat 4 Finley Court Redcar Street
 Flat 63 Laird House Comber Estate
 Redcar Street
 Flat 19 Moffat House Comber Estate
 Comber Grove
 Flat 22 Marinel House Comber Estate
 Comber Grove
 Flat 73 Laird House Comber Estate
 Redcar Street
 Flat 48 Laird House Comber Estate
 Redcar Street
 Flat 47 Laird House Comber Estate
 Redcar Street
 Flat 43 Laird House Comber Estate
 Redcar Street
 Flat 3 Laird House Comber Estate
 Redcar Street

Flat 24 Laird House Comber Estate
 Redcar Street
 Flat 11 Laird House Comber Estate
 Redcar Street
 Flat 1 Laird House Comber Estate
 Redcar Street
 Flat 4 Grainger Court Redcar Street
 Flat 32 Moffat House Comber Estate
 Comber Grove
 4 Medlar Street London Southwark
 Flat 33 Laing House Comber Estate
 Comber Grove
 3 Hodister Close London Southwark
 6 Medlar Street London Southwark
 Flat 8 Hayes Court Camberwell New Road
 Flat 2 Finley Court Redcar Street
 Flat 8 Grenfell House Comber Estate
 Comber Grove
 Flat 18 Grenfell House Comber Estate
 Comber Grove
 Flat 7 Laing House Comber Estate
 Comber Grove
 Flat 18 Laing House Comber Estate
 Comber Grove
 Flat 14 Laing House Comber Estate
 Comber Grove
 Flat 24 Moffat House Comber Estate
 Comber Grove
 Flat 2 Marinel House Comber Estate
 Comber Grove
 262 Camberwell New Road London Southwark
 Flat 3 Arnot House Comber Estate
 Comber Grove
 Flat 20 Arnot House Comber Estate
 Comber Grove
 Flat 19 Arnot House Comber Estate
 Comber Grove
 Flat 16 Arnot House Comber Estate
 Comber Grove
 279 Camberwell New Road London Southwark
 273 Camberwell New Road London Southwark

Flat 3 Hayes Court Camberwell New Road
 Flat 15 Grainger Court Redcar Street
 Flat 22 Hayes Court Camberwell New Road
 Flat 3 Grainger Court Redcar Street
 Calvary Temple Councillor Street London
 Flat 12 Grainger Court Redcar Street
 Flat 21 Moules Court Wyndham Road
 Flat 7 Arnot House Comber Estate Comber Grove
 Flat 29 Hayes Court Camberwell New Road
 Flat 4 Hayes Court Camberwell New Road
 9 Medlar Street London Southwark
 285 Camberwell New Road London Southwark
 Flat 2 Moffat House Comber Estate Comber Grove
 Flat 15 Moffat House Comber Estate Comber Grove
 4 Burwood Lodge Camberwell New Road London
 Flat 16 Grenfell House Comber Estate Comber Grove
 Flat 30 Grenfell House Comber Estate Comber Grove
 Flat 27 Grenfell House Comber Estate Comber Grove
 Flat 24 Grenfell House Comber Estate Comber Grove
 Flat 25 Laing House Comber Estate Comber Grove
 Flat 1 Hayes Court Camberwell New Road
 Flat 33 Moffat House Comber Estate Comber Grove
 Flat 25 Moffat House Comber Estate Comber Grove
 Flat 13 Moffat House Comber Estate Comber Grove
 Flat 11 Moffat House Comber Estate Comber Grove

Flat 1 Moffat House Comber Estate Comber Grove
 265 Camberwell New Road London Southwark
 268 Camberwell New Road London Southwark
 Flat 6 Arnot House Comber Estate Comber Grove
 Flat 13 Arnot House Comber Estate Comber Grove
 Flat 69 Laird House Comber Estate Redcar Street
 Flat 55 Laird House Comber Estate Redcar Street
 Flat 36 Laird House Comber Estate Redcar Street
 Flat 29 Laird House Comber Estate Redcar Street
 Flat 25 Laird House Comber Estate Redcar Street
 Flat 12 Laird House Comber Estate Redcar Street
 Flat 20 Grainger Court Redcar Street
 Flat 10 Laing House Comber Estate Comber Grove
 87 Comber Grove London Southwark
 Flat 13 Grainger Court Redcar Street
 Flat 12 Moffat House Comber Estate Comber Grove
 Flat 8 Marinel House Comber Estate Comber Grove
 Flat 6 Marinel House Comber Estate Comber Grove
 Flat 23 Grenfell House Comber Estate Comber Grove
 Flat 26 Hayes Court Camberwell New Road
 Flat 23 Hayes Court Camberwell New Road
 Flat 2 Hayes Court Camberwell New Road
 Flat 22 Moules Court Wyndham Road
 Flat 25 Hayes Court Camberwell New Road
 Flat 31 Grenfell House Comber Estate

Comber Grove
Flat 1 Grenfell House Comber Estate
Comber Grove
Flat 4 Laing House Comber Estate
Comber Grove
3 Burwood Lodge Camberwell New
Road London
269 Camberwell New Road London
Southwark
Flat 20 Laing House Comber Estate
Comber Grove
Flat 3 Moffat House Comber Estate
Comber Grove

112

Flat 29 Moffat House Comber Estate
Comber Grove
Flat 9 Marinel House Comber Estate
Comber Grove
13A Medlar Street London Southwark
81 Laird House Comber Estate Redcar
Street London
Flat 70 Laird House Comber Estate
Redcar Street
Flat 65 Laird House Comber Estate
Redcar Street

Consultation responses received

Internal consultees

LBS Ecology
 LBS Ecology
 LBS Design & Conservation Team [Formal]
 LBS Highways Development & Management
 LBS Ecology
 LBS Design & Conservation Team [Formal]
 LBS Transport Policy
 LBS Highways Development & Management
 LBS Community Infrastructure Levy Team
 LBS Urban Forester
 policy surgery comments
 LBS Flood Risk Management & Urban Drain
 LBS Planning Policy
 LBS Transport Policy
 LBS Archaeology
 LBS Design & Conservation Team [Formal]
 LBS Local Economy
 LBS Ecology
 LBS Highways Development & Management
 LBS Flood Risk Management & Urban Drain
 LBS Urban Forester
 LBS Planning Policy
 LBS Ecology
 LBS Environmental Protection

Statutory and non-statutory organisations

Environment Agency
 Metropolitan Police Service
 Transport for London
 Thames Water

Neighbour comments received:

277 Camberwell New Road London
 Southwark
 275 Camberwell New Road London
 Southwark
 271 Camberwell New Road London
 Southwark
 16 Badsworth Road London Southwark

273 Camberwell New Road London
 Southwark
 16 Badsworth Road London Southwark



Contents

Contents	1
Planning Committee (Smaller Applications)	2
BACKGROUND INFORMATION	3
Site location and description	3
Details of proposal	5
KEY ISSUES FOR CONSIDERATION	6
Summary of main issues.....	6
Legal context	6
Planning policy.....	7
ASSESSMENT.....	7
Principle of the proposed development in terms of land use.....	7
Design quality and heritage	9
Impact upon amenity of neighbours	10
Transport and highways.....	11
Trees, landscaping, ecology and biodiversity	11
Community impact and equalities assessment	12
Human rights implications.....	13
Positive and proactive statement	13
Positive and proactive engagement: summary table.....	14
CONCLUSION	14
BACKGROUND DOCUMENTS.....	15
APPENDICES	15
AUDIT TRAIL.....	15

Meeting Name:	Planning Committee (Smaller Applications)
Date:	22 July 2026
Report title:	Development Management planning application: Application 26/AP/0528 for Full Planning Application Address: Alleyn's School Townley Road, Southwark London SE22 8SU Proposal: Temporary erection of a dining marquee until 31 October 2028
Wards or groups affected:	Goose Green
Classification:	Open
Reason for lateness:	Not Applicable
From:	Director of Planning and Growth
Application Start Date: 27/02/2026	Application Expiry Date: 23/04/2026
Earliest Decision Date: 26/03/2026	

RECOMMENDATION

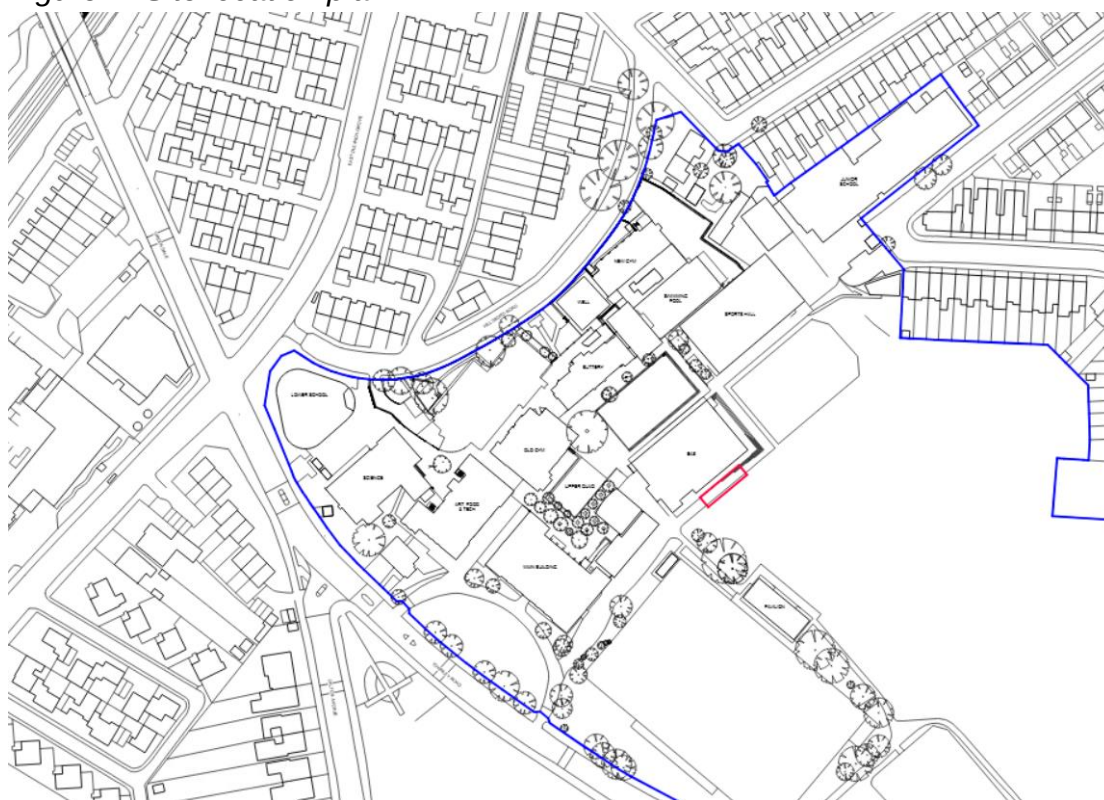
1. That planning permission be granted, subject to conditions.

BACKGROUND INFORMATION

Site location and description

2. Alleyn's School is an independent, co-educational school for 4-18 year olds, located in Townley Road on the border between Dulwich and East Dulwich. The school has been present on the site since the 1880s, with the main school building comprising a substantial three-storey red brick building in the Revival Jacobean style with two-storey flanking bays, and a notable Dutch gable and central cupola with clock. Now the main administration block, the original school building is accessed via a swept drive, off Townley Road. The main pedestrian entrance to the school sits alongside the vehicle entrance.

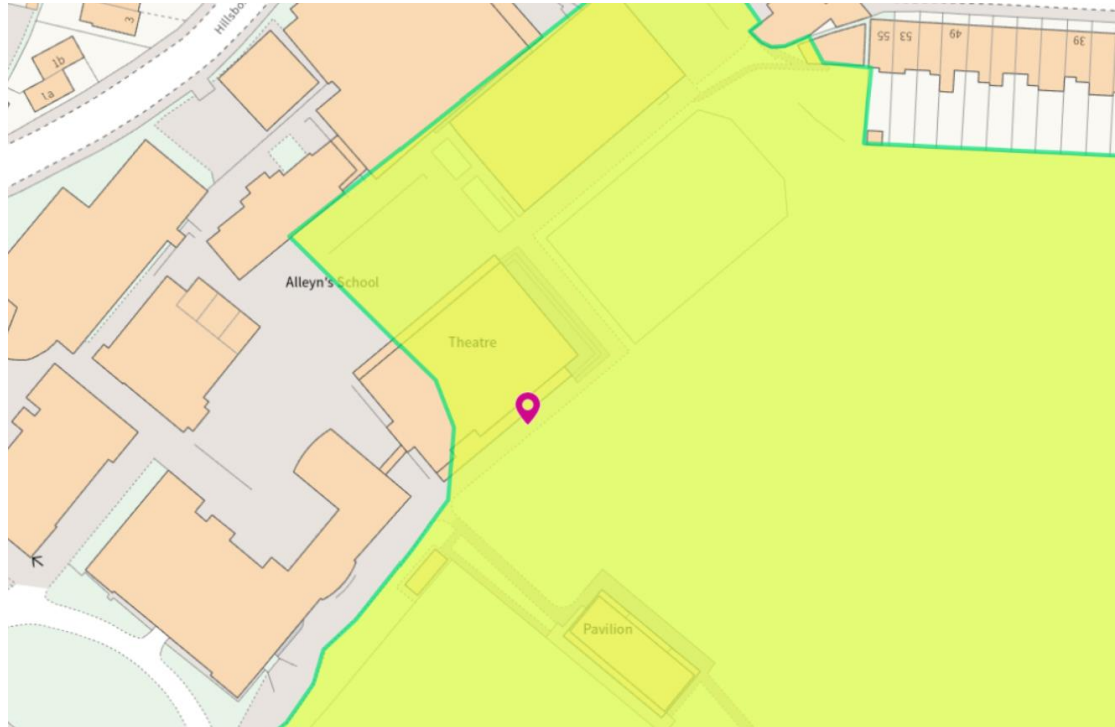
Figure 1: Site location plan



3. This application relates only to the area within the red line boundary, to the south of the school buildings on site.
4. The site is subject to the following designations:
 - Metropolitan Open Land (MOL)
 - Site of Importance for Nature Conservation (SINC)

- Air Quality Management Area
- Central Southwark Critical Drainage Area
- Primrose Hill summit to St Paul's Cathedral London View Management Framework (4A.2)

Figure 2: MOL and SINC designation (yellow)



5. There are no trees within the application site itself.
6. The main school building and its swept drive are within the Dulwich Village Conservation Area (sub area #4), with the school building also locally listed.

Planning history

7. There are a number of recent applications on the wider school site, though none relevant to the application site.
8. For context, planning permission 26/AP/0519 received a resolution to grant, subject to conditions and completion of a legal agreement, at Planning Committee (Smaller Applications) on 30 June 2026 for:

Demolition and replacement of school dining hall with a new school building and associated landscaping works

9. The proposed marquee would be used to provide a temporary dining hall during construction of the new dining hall.

Details of proposal

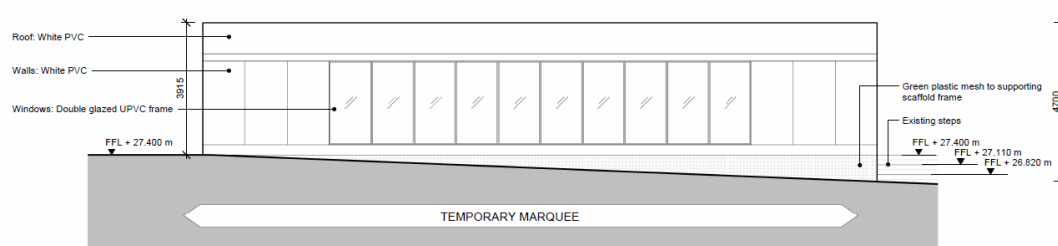
10. This application seeks the erection of a temporary marquee on the hardstanding to the south of the Edward Alleyn's Building, encroaching on just 20 sqm of grassed area, for a temporary period until 31 October 2028. The purpose of the marquee is to provide year-round shelter for dining spaces during construction of the replacement dining hall (granted subject to conditions and completion of a Section 106 legal agreement under planning reference 26/AP/0519).

Figure 3: Photograph of the application site



11. The marquee would be 100 sqm with a length of 20 metres, width of 5 metres and height of 3 metres with a pitched roof reaching 3.915 metres. It would have uPVC white walls and roof with double glazed uPVC windows and doors and green plastic mesh to the supporting scaffold frame.

Figure 4: Proposed side elevation



12. During the course of the application, the proposals have been amended in response to issues raised by Officers. The initial proposals included a marquee further to the south on the school playing field, however, this raised concern with regard to impacting on trees and biodiversity.

Details of consultation

13. Initial neighbour notification letters were sent to 45 properties on 2 March 2026. A site notice was placed on 3 March 2026 and a publication was placed in the Southwark News on 5 March 2026.
14. No comments have been received in response to the consultation.
15. Neighbours were not re-consulted on the amended marquee location, as no comments were received on the original scheme and, being centrally located within the school site, the amendment would not prejudice neighbouring amenity.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

16. The main issues to be considered in respect of this application are:
 - Principle of the proposed development in terms of land use
 - Design quality and heritage
 - Impact upon amenity of neighbours
 - Transport and highways
 - Trees, landscaping, ecology and biodiversity

Legal context

17. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. In this instance the development plan comprises the London Plan 2021 and the Southwark Plan 2022.
18. There are also specific statutory duties, including in respect of the Public Sector Equalities Duty and certain designated heritage assets, which are highlighted in the relevant sections below and in the overall assessment at the end of the report.

Planning policy

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

ASSESSMENT

Principle of the proposed development in terms of land use

20. Policy G3 (Metropolitan Open Land) (MOL) of the London Plan affords MOL the same status and level of protection as Green Belt stating that MOL should be protected from inappropriate development in accordance with national planning policy tests that apply to Green Belt. The National Planning Policy Framework 2024 states that development in the Green Belt is inappropriate unless one of a set of exceptions applies. Relevant to this application is the exception of the provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings, for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.
21. Policy P57 (Open space) of the Southwark Plan states that development will not be permitted on MOL. In exceptional circumstances development may be permitted on MOL when:
 1. It consists of ancillary facilities that positively contribute to the setting, accessibility and quality of the open space and if it does not affect its openness or detract from its character. Ancillary facilities on MOL must be essential for outdoor sport or recreation, cemeteries or for other uses of land which preserve the openness of MOL and do not conflict with its MOL function; or
 2. It consists of the extension or alteration of an existing building providing that it does not result in disproportionate additions over and above the size of the original building; or
 3. It consists of the replacement of an existing building, provided that the new building is no larger than the building it replaces.

22. The marquee itself is not proposed for outdoor sport or recreation and does not therefore fall squarely within the specific examples given above. However, it is ancillary to the continued operation of the school, which itself constitutes the established use of the site, land which is designated as MOL. Southwark Plan Policy P57 similarly allows for 'other uses of land which preserve the openness of MOL and do not conflict with its MOL function', recognising that ancillary facilities supporting an existing, established use of MOL land may be acceptable where the fundamental test of openness is met, even where they do not fall within the narrower categories of outdoor sport, recreation, cemeteries or allotments. The core test applied both nationally and locally is therefore one of impact on openness and conflict with MOL function, rather than a narrow categorisation of use.
23. The marquee would be temporary until 31 October 2028 and ancillary to the operation of the school. As an ancillary facility associated with the existing educational use of the site, it is to be assessed against the first part of the policy which requires development to preserve the openness of MOL.
24. Whilst the MOL designation covers the application site, the site itself comprises predominantly hardstanding, and the openness of the wider MOL in this location is derived principally from the adjoining grassed playing fields. The structure would be sited on the existing hardstanding, with only 20 sqm of grassland affected. It is designed to be white in colour and modest in scale, minimising its visual prominence within the wider MOL. It would be positioned in front of an existing large school building, meaning it would read as a minor addition within the context of substantial existing built form, rather than an isolated structure encroaching into the school's playing fields.
25. Given its temporary nature, limited footprint, siting on hardstanding, and visual relationship to the existing school building, the marquee would not result in any material loss of openness to the MOL, either spatially or visually. As a temporary structure with a defined end date aligning with the construction of the new dining hall, it would have no lasting or permanent impact on the openness of the MOL; upon removal, the land would revert to its existing condition with no residual effect on the character or function of the open space. It would not detract from the character of the open space, nor would it conflict with the recreational and educational functions the MOL serves in this location.
26. The temporary period sought corresponds with the anticipated construction programme for the replacement dining hall. Overall, the proposal aligns with MOL policy requirements and would not result in any change of use from the established educational use. As such, the principle of development is considered acceptable.

Design quality and heritage

27. The main school building and its swept drive are within the Dulwich Village Conservation Area (sub area #4), with the school building also locally listed. The application site itself is not within the conservation area.

Figure 5: View from Townley Road



28. Policy P20 (Conservation areas) of the Southwark Plan requires development within or affecting the setting of a conservation area to preserve or enhance its character and appearance. Policy P26 (Local list) seeks to protect locally listed buildings and their settings from development that would cause harm to the significance of the heritage asset. In addition, Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a statutory duty requiring special attention to be paid to the desirability of preserving or enhancing the character or appearance of a conservation area. Whilst the application site falls outside the boundary of the Dulwich Village Conservation Area, the setting of the conservation area, and of the locally listed school building within it, are material considerations where views into or out of the designated area or towards the heritage asset may be affected.

Figure 6: Product specification image



29. In terms of design and heritage impact, the marquee is considered appropriate in scale, being a single-storey structure, and is proposed in appropriate materials (uPVC). Given its central location within the school site and intervening trees, fencing and courts, the marquee would have very limited visibility from the surrounding streetscene (Townley Road) or from within the conservation area or in the context of the locally listed school building. As such, the proposal would preserve the character and appearance of the conservation area in accordance with Policy P20 and the statutory duty under Section 72(1), and would not harm the setting or significance of the locally listed building, in accordance with Policy P26. The temporary nature of the structure further reduces any potential impact, ensuring no lasting change to the setting of these heritage assets.

Impact upon amenity of neighbours

30. The application site sits within the school site and is not in close proximity to any neighbouring residential properties. The marquee would serve existing pupils during the construction of a new dining hall and would not result in any intensification of education use on the site.
31. By virtue of its scale and siting, it is not considered that the proposal would have any impacts on neighbouring residents in terms of privacy, outlook, sense of enclosure or daylight and sunlight in accordance with Policy P56 (Protection of amenity) of the Southwark Plan.
32. The marquee would include mechanical heating and ventilation to serve the dining space. There would be no cooking on site. Given the modest scale of the plant required, its internal location within the marquee, and the distance to

the nearest neighbouring residential properties, it is not considered that noise or vibration from the mechanical plant would give rise to any material impact on neighbouring amenity. A condition is nonetheless recommended requiring noise levels from any plant to be controlled, to safeguard amenity for the duration of the temporary permission.

Transport and highways

33. The proposal does not raise any transport or highways considerations. The marquee would be located within the existing school site and would not result in any change to vehicular access, parking provision, servicing arrangements, or cycle parking. No policy considerations relating to transport or highways are engaged by this application, and the proposal is considered acceptable in this regard.

Trees, landscaping, ecology and biodiversity

34. During the course of the application, the proposed location of the marquee was amended in response to concerns raised in relation to trees and biodiversity. Although there are no trees within the red line boundary, the marquee was originally proposed in a location close enough to nearby trees outside the site that it would have compromised their root protection areas, which also raised potential health and safety concerns. The applicant was advised to relocate the marquee to a distance of at least 1.5 times the height of any adjacent tree, in line with good arboricultural practice.
35. Following this, the location of the marquee was amended accordingly. The Council's Urban Forester has confirmed that, given the revised location and its appropriate distance from any trees, there are no outstanding concerns regarding root protection or associated risks.
36. Under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by the Environment Act 2021), development is generally required to deliver a minimum of 10% biodiversity net gain, to be maintained for a period of 30 years. However, certain forms of development are exempt from this requirement, including those falling under the 'de minimis' exemption, which applies where the development affects less than 25 sqm of onsite habitat.
37. Given the amended location of the marquee, which now affects only 20 sqm of grassland, the proposal falls below this threshold and therefore meets the 'de minimis' exemption and a biodiversity net gain of 10% is not required.
38. The application site also falls within a Site of Importance for Nature Conservation (SINC). Given the limited effect on grassland and the absence of any impact on trees, the proposal is not considered to result in any adverse

impact on this designation.

Community engagement

39. It is understood that community engagement in respect of the marquee has been undertaken as part of the wider consultation on the replacement dining hall (26/AP/0519), given the marquee forms part of the enabling works for that scheme. The phasing of works, including the temporary marquee, was discussed with the School's Steering Group. The enabling works, including the marquee, were also raised as part of the public consultation exercise on the dining hall proposals, and are referenced on the school's website in connection with the wider building project.

Consultation responses from external consultees

40. No responses were received from external consultees. No further external consultation was considered necessary.

Consultation responses internal consultees

41. Environmental Protection Team:
- No objection.
42. Design and Conservation Team:
- The marquee would be within the school site and barely visible from Townley Road in the context of the Dulwich Village Conservation Area and setting of the locally listed main school building.
43. Urban Forester:
- Initially requested that the marquee be relocated away from trees.
 - The amended location is acceptable and no further concerns are raised.
44. Ecologist:
- Initially advised that the application required Biodiversity Net Gain of 10%.
 - The amended location would not require Biodiversity Net Gain of 10% as it is considered 'de minimis' with less than 25 sqm of habitat affected.
 - There would be no impact on the Site of Importance for Nature Conservation.

Community impact and equalities assessment

45. The Council must not act in a way that is incompatible with rights contained within the European Convention of Human Rights.

46. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.
47. 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, and;
 - 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 to the need to tackle prejudice and promote understanding.P
48. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.
49. Overall, it is not considered that the development would result in known significant adverse impacts to those with protected characteristics.

Human rights implications

50. This planning application engages certain human rights under the Human Rights Act 1998 (the HRA). The HRA prohibits unlawful interference by public bodies with Convention rights. The term 'engage' simply means that human rights may be affected or relevant.

Positive and proactive statement

51. The council has published its development plan on its website together with advice about how applications are considered and the information that needs

to be submitted to ensure timely consideration of an application. Applicants are advised that planning law requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

52. The council provides a pre-application advice service that is available to all applicants in order to assist applicants in formulating proposals that are in accordance with the development plan and submissions that are in accordance with the application requirements.

Positive and proactive engagement: summary table

Was the pre-application service used for this application?	Yes
If the pre-application service was used for this application, was the advice given followed?	Yes
Was the application validated promptly?	Yes
If necessary/appropriate, did the case officer seek amendments to the scheme to improve its prospects of achieving approval?	Yes
To help secure a timely decision, did the case officer submit their recommendation in advance of the agreed Planning Performance Agreement date?	No – but with an agreed Extension of Time date

CONCLUSION

53. The proposal is for a temporary marquee, to be sited on hardstanding to the south of the Edward Alleyn's Building, providing dining space for pupils during construction of the replacement dining hall approved in principle under application 26/AP/0519, which received a resolution to grant subject to conditions and completion of a Section 106 agreement. The structure would be in place for a temporary period until 31 October 2028.
54. Whilst the application site falls within Metropolitan Open Land, the proposal is considered to preserve the openness of the MOL, given its siting predominantly on existing hardstanding, its limited encroachment onto grassland, its temporary nature, and its visual relationship with the existing school building. The principle of development is therefore considered acceptable.

55. In terms of design and heritage, the marquee would be modest in scale and largely screened from view, and would not harm the character or appearance of the Dulwich Village Conservation Area or the setting of the locally listed school building. The proposal would not result in harm to neighbouring amenity and would not give rise to any transport or highways impacts.
56. Following amendments made during the course of the application, the Council's Urban Forester and Ecologist have confirmed that the revised location addresses concerns relating to tree root protection and biodiversity. The proposal falls within the 'de minimis' exemption for biodiversity net gain, and no adverse impact on the Site of Importance for Nature Conservation is anticipated.
57. Having regard to the development plan as a whole, and all other material considerations, the proposal is considered to be acceptable and in accordance with the relevant policies of the development plan. It is recommended that planning permission be granted, subject to conditions.

BACKGROUND DOCUMENTS

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

APPENDICES

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

AUDIT TRAIL

Lead Officer	Stephen Platts, Director of Planning and Growth		
Report Author	Abbie McGovern, Planning Officer		
Version	Final		
Dated	8 July 2026		
Key Decision	No		
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / EXECUTIVE MEMBER			
Officer Title		Comments Sought	Comments included
Strategic Director, Resources		No	No
Strategic Director, Environment, Sustainability and Leisure		No	No
Strategic Director, Housing		No	No
Date final report sent to Constitutional Team			10 July 2026

APPENDIX 1

Recommendation

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

This document is not a decision notice for this application.

Applicant	Alleyn's School	Reg. Number	26/AP/0528
Application Type	Minor application	Case Number	PP-14678709
Recommendation			

Draft of Decision Notice

for the following development:

Temporary erection of a dining marquee until 31 October 2028

Alleyns School Townley Road London Southwark

In accordance with application received on 23 February 2026 and Applicant's Drawing Nos.:

PROPOSED GROUND FLOOR PLAN 24144-AHMM-ZF-GF-DR-A-PL100 received 24/06/2026

PROPOSED ROOF PLAN 24144-AHMM-ZF-RF-DR-A-PL101 received 24/06/2026

SITE LOCATION PLAN 24144-AHMM-ZF-ZZ-DR-A-PL001. received 24/06/2026

PROPOSED ELEVATIONS AND SECTIONS 24144-AHMM-ZF-ZZ-DR-A-PL200 received 24/06/2026

PROPOSED SITE PLAN 24144-AHMM-ZF-ZZ-DR-A-PL003 received 24/06/2026

Time limit for implementing this permission and the approved plans

2. The marquee hereby permitted shall be removed, and the land restored to its former condition, on or before 31 October 2028. The marquee shall not be retained on the site beyond this date.

Reason:

The development is only considered acceptable on Metropolitan Open Land as a temporary structure ancillary to the existing use of the site, and would not otherwise preserve the openness of the MOL or accord with Policy G3 (Metropolitan Open Land) of the London Plan 2021 and Policy P57 (Open space) of the Southwark Plan 2022 if retained permanently.

Permission is subject to the following Pre-Use Condition

3. The Rated sound level from any plant, together with any associated ducting, shall not exceed the Background sound level (LA90,15min) at the nearest noise sensitive premises. Furthermore, the Specific plant sound level shall be 10dB(A) or more below the background sound level in this location. For the purposes of this condition the Background, Rating and Specific Sound levels shall be calculated fully in accordance with the methodology of BS4142:2014+A1:2019.

Suitable acoustic treatments shall be used to ensure compliance with the above standard. Prior to first use 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.

The plant and any approved acoustic mitigation measures shall thereafter be retained and maintained for the lifetime of the development.

Reason:

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance or the local environment from noise creep due to plant and machinery in accordance with the National Planning Policy Framework 2024, Policies P56 (Protection of amenity) and P66 (Reducing noise pollution and enhancing soundscapes) of the Southwark Plan 2022.

Permission is subject to the following Compliance Condition

4. The marquee hereby permitted shall be constructed using the materials specified on the approved plans: white uPVC walls and roof, uPVC windows and doors, and green plastic mesh to the supporting scaffold frame.

Reason:

To ensure a satisfactory appearance and to safeguard the character and appearance of the Dulwich Village Conservation Area and the setting of the locally listed school building, in accordance with Policies P14 (Design quality), P20 (Conservation areas) and P26 (Local list) of the Southwark Plan 2022.

APPENDIX 2

Relevant Planning Policy

National Planning Policy Framework

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

The relevant chapters from the Framework are:

- Chapter 11 Making effective use of land
- Chapter 12 Achieving well-designed places
- Chapter 13 Protecting Green Belt land
- Chapter 15 Conserving and enhancing the natural environment
- Chapter 16 Conserving and enhancing the historic environment

The London Plan 2021

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

- Policy D4 Delivering good design
- Policy S3 Education and childcare facilities
- Policy HC1 Heritage conservation and growth
- Policy G3 Metropolitan Open Land
- Policy G4 Open space
- Policy G7 Trees and woodlands

Southwark Plan 2022

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

- Policy P13 Design of places
- Policy P14 Design quality
- Policy P20 Conservation areas
- Policy P26 Local list
- Policy P27 Education places
- Policy P56 Protection of amenity
- Policy P57 Open space

- Policy P60 Biodiversity
- Policy P61 Trees
- Policy P65 Improving air quality
- Policy P66 Reducing noise pollution and enhancing soundscapes

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

Reference number	Description	Status
26/AP/0519	Demolition and replacement of school dining hall with a new school building and associated landscaping works	Resolution to grant made at Planning Committee (Smaller Applications) on 30 June 2026 subject to conditions and completion of a Section 106 legal agreement

APPENDIX 4

Consultation and re-consultation undertaken

Site notice date: 03/03/2026

Press notice date: 05/03/2026

Case officer site visit date: 03/03/2026

Neighbour consultation letters sent: 02/03/2026

Internal services consulted

LBS Environmental Protection Team

LBS Design and Conservation Team

LBS Ecology Officer

LBS Urban Forester

Neighbour and local groups consulted

19 Townley Road London Southwark
 20 Townley Road London Southwark
 21 Townley Road London Southwark
 22 Townley Road London Southwark
 23 Townley Road London Southwark
 24 Townley Road London Southwark
 10 Dovercourt Road London Southwark
 12 Dovercourt Road London Southwark
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64 Dovercourt Road London Southwark
8 Dovercourt Road London Southwark
2A Dovercourt Road London Southwark
28 Calton Avenue London Southwark
30 Calton Avenue London Southwark
32 Calton Avenue London Southwark
34 Calton Avenue London Southwark
36 Calton Avenue London Southwark
St Barnabas Vicarage Calton Avenue London
Parish Office 40 Calton Avenue London

APPENDIX 5**Consultation responses received****Internal services comments received**

LBS Environmental Protection Team
LBS Design and Conservation Team
LBS Ecology Officer
LBS Urban Forester

OPEN		MUNICIPAL YEAR 2026-27	
COMMITTEE:	PLANNING COMMITTEE (SMALLER APPLICATIONS)		
NOTE:	Original held in Constitutional Team; all amendments/queries to Beverley Olamijulo, Constitutional Team, Tel: 020 7525 7234		
OPEN			
COPIES		COPIES	
MEMBERS		PLANNING TEAM	
Councillor Richard Taylor (Chair)	1	Dennis Sangweme / Stephen Platts	1
Councillor Jane Salmon (Vice-Chair)	1		
Councillor Andy Higson	1	COMMUNICATIONS TEAM (Electronic)	
Councillor Sean Hannigan	1	Eddie Townsend	
Councillor James Moyse	1		
Councillor Margy Newens	1	LEGAL TEAM (Electronic)	
Councillor Kath Whittam	1	Kamil Dolebski (Law & Governance) Michael Feeney (FTB Chambers)	
Electronic Copies (No paper)		CONSTITUTIONAL TEAM	
Councillor Ryan Cox (reserve)		Beverley Olamijulo	4
Councillor Catherine Dawkins (reserve)		TOTAL PRINT RUN	12
Councillor Sam Dalton (reserve)			
Councillor Victoria Mills (reserve)			
Councillor Pascale Mitchell (reserve)			
Councillor David Noakes (reserve)			
Councillor Leigh Richman (reserve)			
MEMBER OF PARLIAMENT (Electronic)			
Helen Hayes MP			
Neil Coyle MP			
Miatta Fahnbulleh MP			
House of Commons, London, SW1A 0AA			
		List Updated: 14 July 2026	