

Contents

Contents	1
EXECUTIVE SUMMARY	3
BACKGROUND INFORMATION	5
Site location and description	5
Details of proposal	7
Planning history of the site, and adjoining or nearby sites.	9
KEY ISSUES FOR CONSIDERATION	9
Summary of main issues	9
Legal context	10
Planning policy	10
ASSESSMENT	10
Principle of the proposed development in terms of land use	11
Environmental impact assessment	13
Design.....	15
Impact of proposed development on amenity of adjoining occupiers and surrounding area	24
Noise and vibration	29
Energy and sustainability	33
Planning obligations (S.106 agreement)	35
Mayoral and borough community infrastructure levy (CIL)	36
Other matters.....	36
Community involvement and engagement	36
Community impact and equalities assessment	37
Human rights implications	38
Positive and proactive statement	38
Positive and proactive engagement: summary table	39
CONCLUSION	39
BACKGROUND INFORMATION	40
BACKGROUND DOCUMENTS	40
APPENDICES.....	40
AUDIT TRAIL.....	40
Appendix 1: Draft of Decision Notice	41
Appendix 2: Planning Policies.....	46

Appendix 3: Relevant planning history 46

Appendix 4: Consultation undertaken..... 47

Appendix 5: Consultation responses received 66

Item No.	Classification:	Date:	Meeting Name:
6.2	OPEN	14 December 2021	Planning Committee
Report title:	Development Management planning application: Application for: Full Planning Application: 21/AP/0451 Address: 1-13 Southampton Way, London, Southwark, SE5 7SW Proposal: Clearance of site and redevelopment to provide 32 affordable homes and a flexible commercial (use class E) / community unit (Use Class F2) in a building ranging in height from three to seven storeys, along with cycle parking, refuse facilities and landscaped public realm including provision of land to be incorporated into Burgess Park.		
Ward(s) or groups affected:	St Giles		
From:	Director of Planning and Growth		
Application Start Date		PPA Expiry Date 31/03/2021	
Earliest Decision Date			

RECOMMENDATION

1. That planning permission be refused subject to the referral of the application to the Greater London Authority.

EXECUTIVE SUMMARY

2. The proposal is for the clearance of site and redevelopment to provide 32 homes and a flexible commercial (use class E) / community unit (Use Class F2) in a building ranging in height from three to seven storeys, along with cycle parking, refuse facilities and landscaped public realm including provision of land to be incorporated into Burgess Park.
3. The site is situated within Metropolitan Open Land and as such is protected from unsuitable development in the same manner as Green Belt Land. Whilst it is noted that there would be some public benefit from the proposed development which includes affordable housing and land to be handed over to the park, the proposal is considered to be inappropriate development within MOL and would have a significant impact on the openness of MOL.
4. In relation to the other aspects, the scale, massing and design of the proposal is considered acceptable in streetscape terms (notwithstanding its impact on MOL) and would provide 100% affordable housing. The proposed quality of

accommodation is also considered of a high quality.

5. The proposal would result in some moderate impact on amenity by way of daylight impacts, this is due to the site currently being very low rise and as such any development would have an impacts on the surrounding properties. However the remaining daylight levels received within the wider blocks is commensurate to other buildings within the wider area and as such on balance this is considered acceptable.
6. The proposal would provide a high level of carbon saving of 93% and would not result in any significant transport implications for the existing or future residents on the site
7. Nonetheless, the positive elements of the scheme are considered to be outweighed by the substantial harm to MOL by way of the scale and massing of the building within MOL and its subsequent impact on the setting and views from within Burgess Park.
8. Planning Summary - Tables

Housing

Homes	Aff.SR Homes	Aff.SR HR	Aff.Int Homes	Aff.Int HR	Homes Total (% of total)	HR Total
1 bed	0	0	8	16	8 (25%)	16
2 bed	0	0	18	54	18 (56.25%)	54
3 bed	6	24	0	0	6 (18.75%)	24
Total and (% of total)	6 (18.75%)	24 (25.53%)	24 (81.25%)	70 (74.47%)	32 (100%)	94 (100%)

Commercial

Use Class	Existing sqm	Proposed sqm	Change +/-
Use Class E (a) to (f) retail/financial services and existing Sui Generis use.	549sqm	102sqm	-447
Jobs	Unknown	Unknown	N/A.

Parks and Child play space

	Existing sqm	Proposed sqm	Change +/-
Public Open Space	0	424	+424
Play Space	0	67.9	+67.9

Environmental

CO2 Savings beyond part L Bldg. Regs.	93%
Trees lost - 1	1 Class U
Trees gained - 2 within site (potential for many more in land gifted to Council)	

	Existing	Proposed	Change +/-
Urban Greening Factor	N/A.	0.49	+0.49
Greenfield Run Off Rate	41m3	28.6m3	- 12.4m3
Green/Brown Roofs	0sqm	214sqm	+214sqm
EVCPS (on site)	0	1	+1
Cycle parking spaces	0	62	+62

CIL and S106 (Or Unilateral Undertaking)

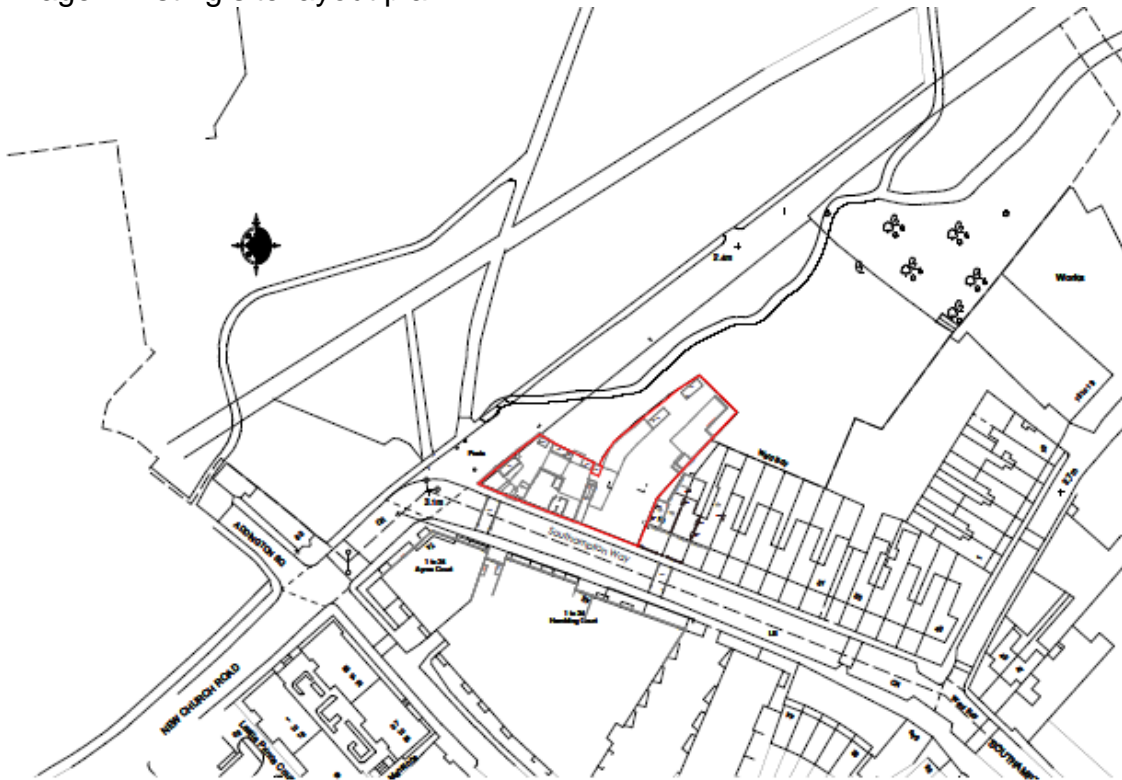
CIL (estimated)	£ TBC
MCIL (estimated)	£ TBC
S106	£22,837.20 (plus additional for planting of land given over to the park which is not yet agreed)

BACKGROUND INFORMATION

Site location and description

9. The application site relates to the land at 1-13 Southampton Way which is located on the corner of Southampton Way and New Church Road. The existing site consists of various commercial uses which include Steptoes & Sons (a bric-a-brac shop/salvage yard) at 1-11 and a car wash operation at 13 Southampton Way.
10. The surrounding area is principally of residential use however, with three storey residential terraced properties on the northern side of Southampton Way and a recent residential development to the south of the site which range from four to seven stories in height. To the northeast of the site there are some commercial uses, however a number of these have planning permission or live planning applications to redevelop the site for residential uses.
11. To the north of the site lies Burgess Park, which is a large public open space which is designated as Metropolitan Open Land (MOL). The proposed site, is also situated within the boundary of the MOL but is not located within the park itself.
12. The site is also located within the Aylesbury Action Area, an Air Quality management area, the Urban Density Zone, Flood Risk Zone 3 and a Critical Drainage Area.
13. There are a number of heritage assets within the immediate and extended area, including Addington Conservation Area located to the north west and a number of listed buildings within Addington Square, also located to the north west.

14. Image: Existing site layout plan



15. Image: Aerial photo



16. Image – Existing building photo



Details of proposal

17. The proposal is for the clearance of site and redevelopment to provide 32 affordable homes and a flexible commercial (use class E) / community unit (Use Class F2) in a building ranging in height from three to seven storeys, along with cycle parking, refuse facilities and landscaped public realm including provision of land to be incorporated into Burgess Park.
18. To the east of the site adjacent to 15 Southampton Way, the proposal would be three and four stories in height and would rise in height to five stories and then seven stories on the corner of New Church Road.
19. The proposal would provide a commercial unit at ground floor on the corner of Southampton Way and New Church Road with a one-bed home and two-bed home at ground floor as well as two residential cores, the cycle store, refuse store and plant rooms. Both of the ground floor homes would be wheelchair accessible homes.
20. Overall the proposal would provide 32 new homes which would consist of eight one-bed homes, 18 two-bed homes and 6 three-bed homes. All of the homes proposed would be affordable, with the split approximately 25:75 between social rent and intermediate homes.
21. The proposal would also provide 424sqm of the ground floor area to the rear of the site to be given over to become part of Burgess Park with an indicative landscape arrangement proposed.
22. Image – Proposed ground floor layout



Amendments to the application

23. No significant amendments have been made to the initially submitted application, however further information has been provided including documents in relation to fire safety, energy, light pollution and overshadowing on the park.
24. **Consultation responses from members of the public and local groups**
25. After the initial publicity of the planning application, the total number of responses that were received from members of the public was 621, 475 of which were in objection to the proposed development and 142 response in support.

In terms of the geographical distribution of the comments received, they are as follows:

Location	Objections:
Total	475
SE5	190
Southwark	161
Wider London	93
Outside of London/Unknown address	31

Location	Support:
Total	142
SE5	17
Southwark	76
Wider London	31
Outside of London/Unknown address	18

The issues raised in objection:

- Development taking place on Metropolitan Open Land
- The proposal would build on land which should be within Burgess Park
- The proposal would harm the entrance into Burgess Park
- Design including height mass and scale and detailed design being inappropriate.
- Impacts on existing residents' amenity, including daylight and sunlight and privacy
- Density is too high and is overdevelopment
- Overshadowing of Burgess Park
- The proposal would impact on the ecology of the nature area.
- Increase in traffic in the area.
- Overlooking concerns.
- Inadequate parking provision
- Would impact on the climate and should be planted.
- Impacts on trees.

Planning history of the site, and adjoining or nearby sites.

26. Any decisions which are significant to the consideration of the current application are referred to within the relevant sections of the report. A fuller history of decisions relating to this site, and other nearby sites, is provided in Appendix 3.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

27. The main issues to be considered in respect of this application are:
- Principle of the proposed development in terms of land use;
 - Environmental impact assessment
 - Housing mix, density and residential quality
 - Affordable housing and development viability
 - Amenity space and children's play space
 - Design, including layout, building heights, landscaping and ecology;
 - Heritage considerations
 - Archaeology
 - Impact of proposed development on amenity of adjoining occupiers and surrounding area, including privacy, daylight and sunlight
 - Transport and highways, including servicing, car parking and cycle parking

- Environmental matters, including construction management, flooding and air quality
 - Energy and sustainability, including carbon emission reduction
 - Ecology and biodiversity
 - Planning obligations (S.106 undertaking or agreement)
 - Mayoral and borough community infrastructure levy (CIL)
 - Consultation responses and community engagement
 - Community impact, equalities assessment and human rights
28. These matters are discussed in detail in the 'Assessment' section of this report.

Legal context

29. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. In this instance the development plan comprises the London Plan 2021, the Core Strategy 2011, and the Saved Southwark Plan 2007. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires decision-makers determining planning applications for development within Conservation Areas to pay special attention to the desirability of preserving or enhancing the character or appearance of that area. Section 66 of the Act also requires the Authority to pay special regard to the desirability of preserving listed buildings and their setting or any features of special architectural or historic interest which they possess.
30. There are also specific statutory duties in respect of the Public Sector Equalities Duty which are highlighted in the relevant sections below and in the overall assessment at the end of the report.

Planning policy

31. The statutory development plans for the Borough comprise the London Plan 2021, Southwark Core Strategy 2011, and saved policies from The Southwark Plan (2007 - July). The National Planning Policy Framework (2021) 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 4. Any policies which are particularly relevant to the consideration of this application are highlighted in the report.
32. The site is located within the Aylesbury Action Area, Metropolitan Open Land, Flood Risk Zone 2/3 and an Air Quality Management Area. The site is also adjacent to a Site of Important Nature Conservation (SINC).

33. ASSESSMENT

Principle of the proposed development in terms of land use

Relevant policy designations

34. NPPF 2021 – Paragraphs: 148-149
The London Plan 2021 – Policy G3 Metropolitan Open Land
Southwark Plan 2008 – Saved Policy 3.25 – Metropolitan Open Land
New Southwark Plan - Policy P56 Open Space
35. As noted, the application site is located within Metropolitan Open Land which covers Burgess Park, however it must be noted that the site does not form part of the park and is in private ownership. Nonetheless, the MOL designation affords the highest possible protection from development as it is considered as the equivalent of Green Belt land as the London Plan 2021 outlines that MOL should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt. Paragraph 148 of the NPPF states that local planning authorities should ensure that substantial weight is given to any harm to the Green Belt when making planning decisions and confirms that very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. This principle therefore extends to designated MOL as set out in the London Plan 2021.
36. Paragraph 149 of the NPPF 2021 outlines that there are potential exceptions to the provision of new buildings as inappropriate in the Green Belt. The exceptions are as follows:
 - a) buildings for agriculture and forestry;
 - b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) 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;
 - c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
 - d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
 - e) limited infilling in villages;
 - f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
 - g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:
 - not have a greater impact on the openness of the Green Belt than the existing development; or
 - not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.
37. In this instance, the most relevant of which to this application would be bullet point (g) which includes limited infilling or the partial or complete

redevelopment of previously developed land, providing this would either:

- Not have a greater impact on the openness compared to the existing development; or
- Not cause substantial harm to openness (where affordable housing is proposed which would meet an identified need).

38. The proposal would introduce new building ranging from three to seven stories which would be significantly taller than the existing buildings on site and as such would not comply with the first point of part g) of paragraph 149. As such, the applicant has proposed for the scheme to be 100% affordable housing, and as such the relevant test in assessing whether the proposal would benefit from the exception within paragraph g), is whether the proposal would result in substantial harm on the openness of MOL.
39. In addition to this, saved policy 3.25 which is echoed by emerging policy 56 of the New Southwark Plan outline that development in MOL will not be permitted unless it meets one of the following exemptions:
 - i. Agriculture and forestry; or
 - ii. Essential facilities for outdoor sport and outdoor recreation, for cemeteries, and for other uses of land which preserve the openness of MOL and which do not conflict with the purposes of including land within MOL; or
 - iii. Extension of or alteration to an existing dwelling, providing that it does not result in disproportionate additions over and above the size of the original building; or
 - iv. Replacement of an existing dwelling, providing that the new dwelling is not materially larger than the dwelling that it replaces.
40. At present, the site is currently occupied by low rise single storey/part two storey buildings which would cover approximately 549sqm of built space within the site and the proposal would result in new buildings which would be three, four, five and seven stories in height which would cover approximately 573sqm of built space within the site. The proposed buildings are materially larger than the dwellings they replace.
41. The proposed building at its tallest, would sit very close to the boundary of Burgess Park where it would directly enclose the secondary entrance into the park from the corner of Southampton Way and New Church Road. Notwithstanding that a section of the site would become part of the park, and comprise an open space contiguous with the rest of the park, the new buildings because of their scale and location would create a substantially less open section of the park when compared with the impact of the existing low rise buildings on site with a significant increase in height directly abutting Burgess Park.
42. Furthermore, the Burgess Park Masterplan (whilst not a planning document, this is a material consideration) had envisioned this site to be incorporated within the park to provide a more open and inviting entrance into the park.. The departure from this would ultimately restrict the future potential for the site to be brought within Burgess Park as envisioned by the Greater London Council and subsequently Southwark Plan through defending the designation at numerous examinations in public for the adoption of Southwark's local

plans.

43. It is noted that the applicants are also proposing other significant public benefits as part of the application, in addition to the provision of affordable housing which include the provision of 424sqm of land within the site to be transferred to the council to be included within Burgess Park as well as committing to a s106 payment to cover the costs of landscaping of that area..
44. However, whilst the test set out in the NPPF does identify the provision of affordable housing to meet an identified need as a key material consideration, it does not identify the transfer of land as proposed here as a key material consideration. Overall, whilst acknowledging that the affordable housing provision would contribute to meeting an identified need, the level of development proposed on the site would result in substantial harm to the openness of MOL and would not meet the exemption requirements outlined within the NPPF, London Plan or Southwark Plan and as such the proposal is considered contrary to policy and unacceptable in principle.

Environmental impact assessment

45. Given the small scale of the proposed development it is not considered to be EIA development as defined within the EIA regulations. The proposals would not have significant effects upon the environment virtue of factors such as its nature, size or location. The matters to be considered can be adequately assessed through the submission of technical reports submitted with the planning application and addressed within the sections of this report.

Density

46. The application site area is approximately 0.1347 hectares and the proposed development would provide 94 habitable rooms which would equate to a proposed density of 694 habitable rooms per hectare which would be below the urban density range of 200-700 habitable rooms per hectare. The proposal would however be of a similar scale to the adjacent blocks. As such, and notwithstanding the impact on the openness of the MOL the density of the proposed development is considered acceptable.

Housing mix, density and residential quality

47. The proposal would provide the following dwelling mix:
 - 1 bed units: 8 (25%). 8 x 1b2p,
 - 2 bed units: 18 (56.25%). 12 x 2b3p + 6 x 2b4p
 - 3 bed units: 6 (18.75%). 6x 3b4p
48. In summary, 75% of units would be two or more bedrooms which would accord with strategic policy 7 'Family Homes' of the Core Strategy. However, the number of 3+ bedrooms would be 6 units which would equate to 18.75% of the dwellings being family sized 3 or more bedrooms units which would fall short of the required 20% in accordance with strategic policy 7. On a habitable room basis, the proposal would however provide 26% 3+ bed units. Nonetheless, there is a shortfall on a unit basis, however this is marginal and given the high

quality of the scheme in general, this shortfall in itself is on balance considered acceptable.

49. At ground floor level, two homes would be provided, a one bed and a two bed home, both of which would be wheelchair accessible homes. On the first floor there would be six homes consisting of two x one-bed homes, one x two-bed home and three three-bed homes with two wheelchair accessible homes provided..
50. On the second floor there would be three x two-bed homes and three x three-bed homes. On the third floor would be five x two-bed homes and one x one-bed home and at fourth floor there would be three x two-bed homes and three x one-bed homes.
51. Four wheelchair accessible homes M4(3) dwellings would also be provided which would meet the required 10% on a habitable room basis with all other residential units designed as accessible and adaptable dwellings in accordance with Approved Document M4(2).
52. Nearly all (94%) of the homes are dual or triple aspect units, the only exceptions being two one bedroom homes with a single aspect on the fourth floor, but these have additional roof lights to provide additional light and ventilation to these properties. The vast majority of rooms (90 of the 95 rooms assessed (95%)) will exceed the recommended minimum target ADF values for their respective room uses.
53. Overall, the quality of accommodation is considered to be of a high standard within the proposed development.

Amenity space

54. In terms of private amenity space, all homes would provide access to private amenity space, with a minimum of 5.3sqm and all family homes providing a minimum of 10sqm of private outdoor amenity space. There is however a shortfall of 43sqm of private amenity space as not all of the homes would provide a minimum of 10sqm. Nonetheless, this shortfall is provided through the provision of a fifth floor roof terrace which would be 180sqm in total space and a ground floor amenity/playspace area of 67.9sqm of floorspace which would significantly exceed the required 50sqm of communal space overall.

Affordable housing and development viability

55. The London Plan (2021) policy H5 - Threshold approach to applications, outlines that development should deliver a minimum of 35% affordable housing. The total provision of 100% of affordable housing based on habitable rooms would significantly exceed the required 35% as outlined within the London Plan (2021) and would provide a high quality of new affordable homes, which is supported. However, as noted within paragraphs 34-44, as the site is

located within MOL, in order to meet the exception tests as outlined within the NPPF that the proposal should deliver an identified affordable housing need, which in this instance the proposal would. However, the test to assess the impacts on the openness of MOL which has previously been assessed, would, in this instance outweigh the positive provision of affordable housing in this instance.

Children's play space

56. Based on the GLA population yield calculator, the proposal would be required to deliver 173.7sqm of children's playspace within the site. The proposal would provide 67.9sqm of floorspace for children aged 0-5 however it would not provide playspace for older children within the site.
57. The GLA Children's Playspace SPG sets out that the maximum walking distance for 5 to 11 year olds is 400 metres and for 12 to 16 year olds is 800 metres. There is an existing large playspace at Burgess Park Woodland play area which is situated approximately 82m to the southwest of the site which provides a large area of play space for older children which can be accessed without having to cross a road. Given this, it is considered that if the application were to have been supported it would be acceptable to provide a financial contribution for the older children's play areas. This contribution would equate to £ 14,526.20.

Design

Site context

58. As noted, the application site is located on the corner of Southampton Way and New Church Road with a three storey terrace of properties to the east, burgess park to the north and west of the site and a residential block of 4 to seven stories to the south.
59. Image – Aerial images



60.



Site layout

61. The proposal is for a mainly linear block at the end and on the east side of Southampton Way at the entrance to Burgess Park. The proposed design steps down from seven storeys at Burgess Park to five storeys and then to four storeys adjacent to a row of three storey mid-Victorian townhouses.

62.



Height scale and massing

63. *Scale and form*

64. The form, height and bulk of the block closely will closely follow that of the Ayres Court and Hambling Court- a recent development opposite the site on the west side of Southampton Way. This development also has a seven storey block at the park entrance of broadly the same bulk as the proposed seven storey element, and also steps down to five and then four storeys to meet smaller scale existing development further along Southampton Way.

65. The site is however a little smaller than the Ayres Court/ Hambling Court complex, so the stepping down will be a little more sudden. In addition, the majority of the block will stand forward of the building line established by the existing three storey townhouses. This means that the scheme will be more prominent in oblique views up Southampton Way from south to north.

66. As noted the building would sit very close to the boundary of Burgess Park and is within MOL. As such, , the height and massing of the building, coupled with its location within MOL and adjacent to Burgess Park, would result in a significant impact on the openness of MOL with views from the park and into the park from Southampton Way and New Church Road.

67. The development also includes a three storey block projecting towards the park at right angles to the main proposed street building. This alludes to the three storey outriggers of adjoining traditional buildings, however, again it

would bring the building closer to Burgess Park impacting on the openness

68. Overall, whilst the scale and massing of the development would be similar to the scale of the buildings opposite, the impact on the townscape and the setting of MOL need to be considered closely together. Overall, officers are of the view that the scale and massing of the proposal in conjunction with its setting within MOL, would result in an unacceptable impact on the openness of MOL.

Architectural design and materials

69. The architecture is a variant of 'New London Vernacular' which will match that of the recently completed Ayres Court development. However it will have inset balconies instead of projecting boxy balconies of Ayres Court and will rather more elegant as a result.
70. In addition, the seven and five storey parts of the block will feature double height windows/ panel recesses and double height balcony recesses to form a double height 'order' to the elevations. In this respect the seven storey element will feature a double height base and will be have an elongated single storey top.
71. On the five storey block this will be reversed with a single storey base and a double height top. This device, of pairing storeys but in a different way for each part of the block will introduce a degree of subtlety and hierarchy to the overall composition. This hierarchy is to be reinforced by slightly more decorative detailing for the seven storey element in the form of stone window surrounds. In addition, the double height balcony recesses will form strong townscape features at the corners of the five and seven storey elements of the scheme.
72. Materials will also vary from element to element, with the seven storey part to be constructed of red brick to match the seven storey block of Ayres Court and to allude to the redbrick Arts and Crafts' blocks immediately to the west of Ayres Court. The rest of the complex will be in buff brick with a recessed red brick base. This material choice responds to context and reinforces the hierarchy of the differently elements of the overall scheme. As such, the detailed design of the proposal is considered acceptable.
73. Image: View looking west along Southampton Way



74. View from the corner of New Church Road and Southampton Way



75. Views from Burgess Park



76.



Heritage considerations

77. There are a number of heritage assets within the immediate and extended area, including Addington Conservation Area located to the north west and a number of listed buildings within Addington Square, also located to the north west.

78. The applicants have provided a heritage, townscape and visual impact assessment which assesses the potential impact of the proposal on the Addington Square and listed buildings that sit within it. The conservation area and listed buildings are situated approximately 90m to the west with the site being separated by large canopy cover from within Burgess Park. The report notes that there would be some glimpse views of the proposed building from within the site, however it notes that it would mainly sit behind the existing buildings within the square and behind the existing tree canopy cover as can be seen from the image below.
79. Overall, it is not considered that there would be a significant impact on the setting of the conservation area or nearby listed buildings.
80. View from Addington Square:



Landscaping, trees and urban greening

81. The existing site contains 4 trees within the boundary and 4 four adjacent to the site. With the exception of a large Buddleja davidii, no trees would be removed from the site. The buddleja is proposed for removal as it is listed as a species of concern on the London Invasive Species Initiative (LISI). There are three retained trees, a medium sized Norway maple and two small sycamore trees which lie in close proximity to existing structures that will be removed/demolished. Tree protection measures would be required in order to ensure that these trees are no harmed during construction and this could be conditioned if the application were to be granted.
82. As noted, the proposal would provide 424sqm of space at ground floor level to be given over to be included within Burgess Park. This would provide a significant improvement in relation to landscaping providing new green space and planting. Three new trees would be planted within the site with the potential for a significant number of trees to be planted within the land given

over to the park as part of the proposal. This would be confirmed through finalised landscaping details which would be secured through a legal agreement in consultation with the parks team if permission were to be granted.

83. The proposal would provide an urban greening factor of 0.49 which would also exceed the required 0.4 level for urban greening factor as required by the London Plan 2021.

84. Image: Landscape layouts



Ecology and biodiversity

85. The council's ecologist has reviewed the submitted details and outlines that the ecological survey assessed the limited ecological value of the site itself. A lighting and shading assessment has also been provided to assess the impacts of the proposal on overshadowing and lighting from the park on the adjacent Burgess Park nature area. The ecologist outlines that the impacts are low in relation to Burgess Park and as such the proposal would not result in significant impacts on the adjacent Burgess park.
86. The existing site contains very limited biodiversity with it being a salvage yard and predominantly hard standing, and given that the proposal would provide land to be incorporated within the park, the proposal offers potential for significant ecological net gain through landscaping. Furthermore, other ecological features such as bat/bird bricks, green roof and planting at roof level would also provide new planting on site.

Designing out crime

87. The Metropolitan Police have provided a response to the application and they note that the proposed scheme has the potential meet secure by design accreditation. A condition would be recommended to require further information in order to ensure that the development does meet secure by design accreditation in the event that planning permission were to be granted.

Fire safety

88. London Plan policy D12 outlines that for all major developments, a fire statement should be provided which sets out how the development will function in terms of the following:

- 1) The building's construction: methods, products and materials used, including manufacturers' details.
- 2) The means of escape for all building users: suitably designed stair cores, escape for building users who are disabled or require level access, and associated evacuation strategy approach.
- 3) features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans
- 4) Access for fire service personnel and equipment: how this will be achieved in an evacuation situation, water supplies, provision and positioning of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and the ongoing maintenance and monitoring of these.
- 5) How provision will be made within the curtilage of the site to enable fire appliances to gain access to the building.
- 6) Ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.

89. The applicants have provided a fire statement with the application which outlines that the proposal would be completed with non-combustible materials to limit surface spread of all walls and roof coverings, and identifies the need for fire doors. It sets out the means of escape for all building users, with a 'stay-put' strategy, whereby only the flat of fire origin will be signalled to evacuate upon activation of a fire detector. The building will be fitted with a protected stair and by an evacuation lift for disabled persons as well as all units being fitted with an automatic sprinkler system with coverage throughout. The report also outlines the access arrangements for the fire brigade from Southampton Way into the building and to the upper floors by the protected stair core. The submitted fire strategy accords with the requirements of London Plan policy D12 and a condition if planning permission were to be granted, it is recommended for the development to be carried out in accordance with the recommendations of the report. The London Plan requirements and the proposed measures are outlined within the table below.

90.	London Plan D12 (A) requirement	Information provided in the submission to address the requirements of D12 (A)
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1) Identify suitably positioned unobstructed outside space for fire appliances to be positioned on and appropriate for use as an evacuation assembly point.	Access for firefighters is proposed from the entrance off of Southampton Way. The report does not outline a proposed assembly point for occupiers, however in the event that planning permission were to be granted, there is sufficient space within the site or on street for occupiers to muster.
2) Incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire.	Various active and passive fire safety measures are proposed including a fire detection and alarm system, suitable means of escape, fire resistance and compartmentation, and fire suppression.
3) Be appropriately constructed to minimise the risk of fire spread.	The construction method is to be confirmed during the detailed design of development. The building will be constructed in compliance with the relevant Building Regulations related to fire safety.
4) Provide suitable and convenient means of escape, and associated evacuation strategy for all building users.	A stay put evacuation strategy is proposed. Fire detection and alarm systems are to be installed and suitable escape routes have been identified for the scale of development.
5) Develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in.	The management requirements will be required to be clearly detailed by the managing company for the building. The report does not outline how the future management of the evacuation strategy would be reviewed, however in the event that planning permission would be granted, this information could be provided via condition.
6) Provide suitable access and equipment for firefighting which is appropriate for the size and use of the development.	Direct access for firefighting has been identified off Southampton Way. Dry riser points would be provided and existing fire hydrants are within the required distance from the site

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

Outlook and privacy

91. The proposed building is situated to the norther side of Southampton Way and would adjoin onto the flank elevation of no.15 Southampton Way. There are no windows within this flank elevation and as such there would not be any impacts in terms of outlook or privacy here.
92. However, the adjoining property does contain windows within the side elevation of the outrigger of the building. Here, there would be a minimum 6m distance to the proposed building to the rear of the application site, and whilst there are windows within the east facing elevation of the proposal, these windows are secondary windows within living spaces, and as such if planning permission were to be granted it would be prudent to place a condition to ensure that these windows are obscure glazed. In terms of outlook impacts on no.15 Southampton Way, given the scale of the proposed building would be 3 stories at this point, it would essentially replicate the outriggers of the adjoining terrace. As such it is not considered that there would be a significant impact on this property.
93. To the south of the site are residential properties within Hambling and Ayres Court. The properties would however be a minimum of 15m away from the habitable windows within the application site and as such the distances would exceed the required 12m between habitable windows across a road, as outlined within the Residential Design Standards. Given this distance it is not considered that there would be any impacts in terms of outlook or overlooking into these properties.
94. To the west and north of the site lies Burgess Park and as such no outlook or overlooking issues would be had on residential properties. The impact on the openness of Burgess park is set out in paragraphs xxx to xxx which outlines that the proposal would however result in a substantial impact on the openness of MOL. In terms of overlooking of the users of Burgess Park, whilst it is noted that there would be windows close to the boundary with the park, the area immediately adjacent to the site is a wild planted area which is not principally used by members of the public. As such, it is not considered that the proposal would impact on the users of the park significantly.

Daylight

95. A daylight and sunlight report based on the BRE guidance has been provided, and the following daylight tests have been undertaken:
 - Vertical Sky Component (VSC) is the amount of skylight reaching a window expressed as a percentage. The guidance recommends that the windows of neighbouring properties achieve a VSC of at least 27%, and notes that if the VSC is reduced to no less than 0.8 times its former value (i.e. 20% reduction) following the construction of a development, then the reduction will not be noticeable.
 - No-Sky Line (NSL) is the area of a room at desk height that can see the sky. The guidance suggests that the NSL should not be reduced to less than 0.8 times its former value (i.e. no more than a 20% reduction). This is also known

as daylight distribution, and where windows do not pass the VSC test the NSL test can be used.

96. 15-19 Southampton Way

These properties are located to the east of the site and consists of 3 terraced houses. There are no windows within the immediately adjoining flank wall of no.15, however there are numerous windows within the elevations of the outriggers and rear elevations of the buildings.

Vertical Sky Component (VSC)					
Window			Loss		
Total	Pass	BRE compliant	20-30%	31-40%	40% +
25	19	76%	0	3	3
No Sky Line (NSL)					
Room					
Total	Pass	BRE compliant	20-30%	31-40%	40% +
17	12	70%	3	0	2

97. The principal impact of the proposal on these properties is on no.15 Southampton Way where six windows would be impacted beyond BRE guidance and this relates to three bedrooms and three kitchens. At present, the existing windows have very good access to daylight with VSC's around 28% as a result of the open aspect to the west. Following the development, the retained VSC levels would range from 9% to 21%. It is noted that these impacts would exceed the BRE guidance, however the retained VSC levels are similar to the windows within the rear and flank elevations of no.17 and 19 Southampton Way which demonstrates that the existing high VSC levels are as a result of the current open aspect to the west.

98. Looking at the daylight distribution, 12 of the 17 rooms assessed would comply with the BRE guidelines. Three of these rooms would fall slightly below 0.8 times the former value at 0.76 and 0.78. As such these rooms are not considered to result in a significant loss of daylight. In relation to the other two rooms, these relate to kitchens and as noted above, the retained daylight would be comparable to the other terraced properties on Southampton Way. As such the overall impacts are considered to on balance be acceptable.

99. All of the windows and rooms within 17 and 19 Southampton Way would meet the requirements of the BRE guidance and as such no impacts are had here.

Ayres Court:

100.

Vertical Sky Component (VSC)					
Window			Loss		
Total	Pass	BRE compliant	20-30%	31-40%	40% +
38	20	52.6%	3	8	7
No Sky Line (NSL)					
Room					
Total	Pass	BRE compliant	20-30%	31-40%	40% +
26	19	73.1%	2	4	1

101. The properties within Ayres Court are located to the south of the proposed building and the outlook from these properties is currently relatively unhindered with the existing buildings on the application site being low rise one and two storey buildings.
102. The submitted daylight assessment outlines that analysis shows that 20 of the 38 windows assessed would comply with the BRE Report guidelines using the VSC test. Moving to the daylight distribution of the rooms served by these windows, 19 of 26 of the rooms would meet the required daylight distributions levels which would comprise five bedrooms and two living/kitchen/dining rooms (LKDs).
103. Two of these are located at ground floor and would retain relatively high VSC levels between 18.74% and 24.51% which demonstrates that these windows would still receive good levels of daylight. The other windows are located at ground floor to fourth floor and these windows are situated below balconies which demonstrate that the main reason for the lower levels of VSC levels received within these windows. Furthermore, the levels of light received within these windows would be similar to those achieved within the developments to the south. As such, overall the level of light received within these properties is considered to be of an acceptable level.

Hambling Court

104. Vertical Sky Component (VSC)

Window			Loss		
Total	Pass	BRE compliant	20-30%	31-40%	40% +
77	46	59.7%	13	4	1
No Sky Line (NSL)					
Room					
Total	Pass	BRE compliant	20-30%	31-40%	40% +
52	35	67.3%	7	3	7

105. Looking at the VSC results at these properties, these show that 46 of the 77 windows assessed would comply with the BRE Report guidelines. Looking at the daylight distribution results show that 35 of the 52 rooms would comply with the BRE Report guidelines.
106. Similarly to Ayres Court, the properties within Hambling Court are located to the south of the proposed building and the outlook from these properties is currently relatively unhindered.
107. The VSC results received within the block note that there would be some significant digressions from the required BRE standards, however, as noted, the scale of the proposed building is broadly comparable in scale to Hambling Court at four and five stories and the windows would on average still receive on average VSC levels of 20% at ground floor, 16% at first and second floor and 21-22% at third and fourth floor which demonstrates that generally windows will receive good access to daylight within an urban context. The

daylight and sunlight report also notes that these light levels are also similar to those within the courtyard of Hambling Court, as such on balance the impacts on daylight are considered acceptable given the contextual analysis demonstrated.

108. Furthermore, the windows most affected by the proposed development would be those which sit under balconies which demonstrates that the main proportionate impact on the daylight received within these windows is as a result of the balcony obstructions.
109. In terms of daylight distribution, whilst again there would be some failings beyond the BRE guidance again the main affected rooms are those situated beneath balconies which again demonstrates that these are the main contributor to the impacts on daylight received within rooms.

Sunlight

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

15-19 Southampton Way:

111. The APSH results show that all of the windows orientated within 90-degrees of due south would comply with the BRE Report guidelines for both annual and winter sunlight.

Ayres Court:

112. In relation to sunlight, the vast majority of windows on this building are orientated in a northerly direction and therefore sunlight amenity does not need to be assessed. Five windows on the flank elevation are orientated within 90-degrees of due south and therefore sunlight has been assessed. All of these windows would comply with the guidelines for winter sunlight, however one windows would fail the annual sunlight test, which would serve a ground floor living/kitchen/dining room, and this would be reduced from 9% to 4% APSH. This unit is principally a northerly aspect unit with any development on the application site likely to result in an impact on sunlight received here. However the main issue is the design of this unit with its principal outlook to the north and as such the impacts here are acceptable.

Hambling Court

113. In terms of the impacts on sunlight, the APSH results show that all 23 windows orientated within 90-degrees of due south would comply with the BRE Report guidelines for both daylight and sunlight amenity.

Overshadowing of amenity spaces

114. The BRE guidance outlines that at least half of an amenity area should receive at least 2 hours of direct sunlight on 21 March. If, as a result of new development, an amenity area does not meet the above criteria, and the area which can receive 2 hours of sun on 21 March is reduced to less than 0.80 times its former value, then the loss of sunlight is likely to be noticeable. The BRE guidance outlines that where a development may affect a large amenity area, such as Burgess Park, then illustrative shadow plans are produced, known as a transient overshadowing assessment, showing the locations of shadows at different times of day and year.
115. The daylight and sunlight assessment provides an analysis of the impacts of the proposal on the surrounding private amenity spaces of the terraced properties along Southampton Way would all continue to receive in excess of 50% of the gardens receiving at least 2 hours of sunlight and as such would meet the requirements of the BRE guidance.
116. In terms of the overshadowing of Burgess Park, the results show that 97% of the area would receive in excess of 2 hours of direct sunlight on 21 March, well in excess of the recommendations in the BRE Report. On 21 June, the entire area would receive at least 2 hours of direct sunlight. Further transient overshadowing plans showing the shadow cast on the park at different times of day and year have also been provided which outlines that the proposal would result in a shadow cast to the west of the development during the morning and to the north of the development in the afternoon. The Council's Ecologist has reviewed the submitted information and are satisfied that there would not be a significant impact on habitats or landscaping within Burgess Park.

Conclusion on daylight and sunlight

117. Overall, it is acknowledged that there would be some impacts on the surrounding properties in terms of daylight, however much of the impacts are as a result of the existing balcony overhangs that are within the blocks at Hambling and Ayres Court. Overall the majority of windows and rooms would still receive good daylight levels. Furthermore, the proposal would not result in a significant impact on sunlight received to windows or the surrounding outdoor amenity and park spaces.

Noise and vibration

118. The applications have provided a noise impact assessment which reviews the background noise levels and the potential impacts from noise generating elements of the proposed development. The report recommends that robust glazing is required in order to ensure that the council's internal noise levels are met. A condition is thus recommended to ensure that the residential spaces will meet the required internal noise levels.
119. In terms of impacts from the development on the surrounding properties, a café/community use is also proposed at ground floor which would have the

potential to have some noise impacts from patrons. However, it would be considered prudent to limit hours of operation to restrict late night uses in order to protect the amenity of the surrounding residents if planning permission were to be granted.

Transport and highways

Site layout

120. This development abuts the south-western periphery of Burgess Park near the intersection of Southampton Way with New Church Road and the footway at its western side on New Church Road is wide and has been renewed up to its section around New Church Road/Sears Street junction. The footway segment along this side of Southampton Way connects to the immediate shared east-west pedestrian/cycle route through Burgess Park, linking Camberwell Road to Wells Way via New Church Road.
121. There are traffic calming measures along this road section in the form of two humps plus a raised pedestrian crossing at its proximate western side. There are cycle routes close to the western end of this site via Southampton Way and the neighbouring Addington Square plus a signed north-south cycle route on Wells Way between New Kent Road and Peckham Road. The applicant has proposed a pedestrian environment in juxtaposition with the footway adjacent to the southern perimeter of this site on Southampton Way, 7 pedestrian accesses from this road, 1 vehicle crossover from it also at the south-eastern end of this development plus refuse and cycle stores close to the highway on Southampton Way.

Trip generation

122. This proposed development is in an area with moderate public transport accessibility level and within short walking distances of the bus routes on A215 Camberwell Road and Wells Way and, some 2Kms (northerly) to Elephant & Castle train/tube station. Concerning the vehicle movements emanating from this development proposal, using comparable sites' travel surveys within TRICS travel database has revealed that in its entirety, it would generate approximately 3 and 5 two-way vehicle movements in the morning and evening peak hours respectively. When compared against the 7 and 10 two-way vehicle movements in the morning and evening peak hours separately estimated by the applicant's consultants for the present car repair/wash buildings on this site, would mean that it would create 2 and 5 less two-way vehicle movements in the morning and evening peak hours, correspondingly.
123. Officers have taken account of the likely vehicle movements from other committed developments in this locality, this proposed development not have any noticeable adverse impact on the current vehicular traffic on the adjoining roads. Moreover, the applicant's consultants have projected that this development would create some 10 two-way public transport trips in the

morning or evening peaks hours.

Servicing and deliveries

124. The applicants are proposing that servicing will be undertaken on-street on the northern side of Southampton Way, as per the existing arrangements at the site. There are on-street parking bays adjacent to the site which can be used for a maximum of 30 minutes for loading and given the scale of the development with only a small commercial unit and 32 residential units, it is not considered that the proposal would result in any significant impacts on the surrounding highway network.

Refuse storage arrangements

125. Two refuse storage areas are proposed at ground floor level, one within Core A which would contain two Eurobins and one within Core B containing seven Eurobins. The overall capacity provided within these bin stores would meet the overall refuse storage requirements as outlined within the Councils Waste management guidance notes. Furthermore, the drag distance to refuse vehicles collecting the refuse and recycling would be within the required distances which again is considered appropriate.

Car parking

126. The site is located within the East Camberwell CPZ offers car parking restrictions in this vicinity weekdays, from 0830hrs to 1830hrs. There is a car club close to this development on Sam King Walk and others on the nearby Broome Way and off Camberwell Road and Bradenham Close. The applicant has proposed 1 disabled car parking space as shown on Plan No. GA-P-L00_1-100/P1. This level of parking is considered acceptable given the relatively good access to public transport. In any event, the prospective residents of this development will be barred from obtaining car parking permits under the CPZ in this locality. Nevertheless, the applicant will be required to provide active electric vehicle charging point (EVCP) for the proposed car parking bay.

Cycle parking and cycling facilities

127. The applicant has proposed 46 two-tier Josta cycle parking spaces, 3 disabled and 1 cargo cycle parking spaces plus 12 Sheffield cycle racks holding 24 cycle parking spaces (74 in total, see Plan No. GA-P-L00_1-100/P1). This cycle storage provision would accord with the requirements of the London Plan 2021 and is considered acceptable.

Environmental matters

Construction management

128. A draft construction management plan has been submitted which identifies measures in order to limit the impact on the surrounding highways in terms of traffic and to ensure that the surrounding residents are not significantly impacted upon in terms of noise, dust etc. during construction. The measures recommended are appropriate, however a finalised CMP would be required to be submitted if the application were to be granted. In this event a condition would be recommended.

Water resources

129. Thames Water have responded to the consultation request and have outlined that they would not have any objections to the development in terms of water capacity. However their response notes that there are public sewers crossing the site and as such have requested a condition to be attached for pilling details to be submitted prior to commencement in order to ensure that any development would not impact on any Thames Water assets. In the event permission were to be granted then a condition would be attached.

Flood risk

130. The applicants have provided a flood risk statement which looks at the potential flood risks with the proposed development. The Environment Agency have responded to the application and have not raised any objections, however they have requested two conditions to be attached to any permission in relation to any potential contamination on site and drainage details.

Sustainable urban drainage

131. The applicants have provided a drainage statement which has been reviewed by the Council's flood and drainage team and is acceptable.

Land contamination

132. A contamination report has been provided and reviewed by the Council's Environmental Protection Team who have noted that the report outlines that there is a need for further phase 2 report is required as a result of organic and inorganic pollutants being found that would need remediating for the proposed residential use. A condition is proposed to require this further information to be submitted prior to the commencement of development.

Air quality

133. The applicants have provided an Air Quality Assessment with the application which has been reviewed by the Council's Environmental Protection Team. They note that the conclusions of the report are agreed with and that the proposal would not result in any impacts on air quality of the surrounding residents and that the future residents of the site would not be subject to harmful levels of air quality.

134. The report also outlines that the proposal would meet the requirements of the New London Plan insofar as the development would meet the requirements of the air quality neutral assessment. As such, the proposal would not result in any significant impacts on air quality within the area.

Light pollution

135. In terms of impacts from the proposal on light pollution within the park, the applicants have provided a light study which outlines that no external lighting fitted on the building and thus any impacts from additional night-time illumination will occur due to light spill from the building. The peak level of illumination over the habitats of Burgess Park SINC will be lux levels that would not significantly impact upon bats. The detailed assessment provided concludes that even with the limited effects of light spill, overall the proposals will result in increased areas of value to foraging bats and other wildlife by way of the additional land to be brought within Burgess Park. The Councils ecologist has confirmed that the light spill would not impact on bat activity and foraging and has raised no objections to the proposal. As such the impacts from light pollution are considered limited and acceptable.

Energy and sustainability

Whole life cycle and carbon capture

136. An energy statement has been provided with the application and this sets out the measures taken to ensure that the proposed development to ensure that the building is as energy efficient as possible, following the London Plan Energy Hierarchy: Be Lean, Be Clean, and Be Green. The overriding objective in the formulation of the strategy is to maximise the reductions in CO₂ emissions through the application of this hierarchy with a cost-effective, viable and technically appropriate approach and to minimise the emission of other pollutants.

Carbon emission reduction

137. The submitted energy statement outlines that the proposal would achieve an overall carbon saving of 93% above building regulations for the domestic element of the proposal and a saving of 67% for the non-domestic elements of the proposal. Overall there would be a significant saving above the required on site savings of 35% and presents the maximum reasonable achievable carbon savings on site from the proposed development. However, a contribution of £8,311 would be required to off-set the shortfall of 7%.
138. Be Lean (use less energy)
It is expected that all developments are to exceed Building Regulation requirements (Part L 2013 Baseline figures for carbon emissions) though passive and active demand reduction measures alone, with the London Plan requiring domestic developments to achieve at least a 10 percent improvement

on Building Regulations from demand reduction measures and Non-domestic developments to achieve at least a 15% improvement on Building Regulations from demand reduction measures.

139. The applicant's energy statement notes that the orientation and massing of the building has been optimised within the site constraints and will provide passive design measures including highly insulating building fabric, high airtightness envelope) and energy efficient services (energy-efficient ventilation systems, high efficiency lighting & controls, which are all to be incorporated.
140. The proposal would result in carbon savings of 6.2 tonnes per year which would equate to 12.81% savings above Building Regulations for the domestic element of the proposal and 0.6 tonnes per year for the non-domestic elements of the proposal (15.23%). Both of these savings would exceed the required levels as outlined within the London Plan for the 'be lean' stage.

Be Clean (supply energy efficiently)

141. The next stage of the energy hierarchy is to consider review whether connection to an area wide heat network is available or if not then the provision of a single energy centre at the site. In 2013, the initial SELCHP District Heating network was agreed between Southwark Council and Veolia. Southwark Council have carried out studies that have highlighted the strategic value of the SELCHP facility as a source of low-carbon water heat in the area. The London Heat Map indicates a route for the extension to the SELCHP District Heat Network proposed to commence later this year will run adjacent near to the, therefore it is proposed that a connection will be made to this network. However, while waiting for the connection a provisional communal gas boiler system will be used until the development can connect to the district heating network.
142. The proposal would result in Carbon savings of 30.9 tonnes per year which would equate to 71% for the domestic element of the proposal and however no savings are proposed for the non-domestic elements of the proposal at the be-clean stage of the energy hierarchy.

Be Green (Use low or carbon zero energy)

143. The final stage of the energy hierarchy is to incorporate renewable energy technology onsite to further reduce emissions towards the zero carbon target for the residential element. Photovoltaic panels will be provided to the roof and are part of the "biosolar" roof strategy with an air source heat pump proposed for the commercial unit.
144. The proposal would result in Carbon savings of 8.2 tonnes per year which would equate to 17% for the domestic element of the proposal and 2.6 tonnes per year (55%) for the non-domestic elements of the proposal at the be green stage of the energy hierarchy.

Be Seen (Monitor and review)

145. As required by the London Plan 2021, under the 'be seen' section, there will be a requirement to monitor, verify and report on the energy performance in order to ensure that the agreed carbon savings are met following construction, a clause could include a clause in any future s106 agreement requiring submission of details to monitor the energy performance.

Overheating

146. Demand for active cooling has been minimised through passive design measures within the proposed building including effective glazing proportions, window orientation, and provision of external shading through balconies which has been analysed using qualitative overheating analyses within the submitted energy statement. Biosolar roofs, trees and balconies are all methods that have been incorporated to help reduce the amount of heat entering the building. In addition high efficiency facades and windows are being provided which have low U-values therefore reducing the rate of heat transfer from outside to in during the summer months.
147. Overall, the submitted details outline that the building has been effectively designed in order to sufficiently mitigate against overheating throughout the buildings on site.

BREEAM

148. The proposal includes a proposed community/café use which would be required to meet a BREEAM rating of very good for the community use and a rating of excellent for a retail/café use. A condition would be required to secure further details in relation to BREEAM accreditation in the event that planning permission was granted.

Planning obligations (S.106 agreement)

149. Saved Policy 2.5 of the Southwark Plan and Policy 8.2 of the London Plan advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. Saved Policy 2.5 of the Southwark Plan is reinforced by the recently adopted Section 106 Planning Obligations 2015 SPD, which sets out in detail the type of development that qualifies for planning obligations. Strategic Policy 14 'Implementation and delivery' of the Core Strategy states that planning obligations will be sought to reduce or mitigate the impact of developments. The NPPF which echoes the Community Infrastructure Levy Regulation 122 which requires obligations be:
- 150.
- necessary to make the development acceptable in planning terms;
 - directly related to the development; and
 - fairly and reasonably related in scale and kind to the development
151. Following the adoption of Southwark's Community Infrastructure Levy (SCIL) on 1 April 2015, much of the historical toolkit obligations such as Education and Strategic Transport have been replaced by SCIL. Only defined site specific mitigation that meets the tests in Regulation 122 can be given weight.

152. At present, the proposal is recommended for refusal by officers, however if members were minded to approve, then obligations in relation to secure all of the proposed dwellings as affordable housing as well as four wheelchair units, children's playspace contribution (£14,526.20), Carbon off-set contributions (£8,311) . The legal agreement would also need to include a s278 highways agreement to cover works including the re-paving of the adjacent footways
153. Any legal agreement would also need to include the transfer of 424sqm of land as proposed by the applicants to be de-contaminated and a financial contribution towards the landscaping of the area which has not yet been agreed.

Mayoral and borough community infrastructure levy (CIL)

154. Section 143 of the Localism Act states that any financial contribution received as community infrastructure levy (CIL) is a material 'local financial consideration' in planning decisions. The requirement for payment of the Mayoral or Southwark CIL is therefore a material consideration. However, the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport invests in London as a whole, primarily Crossrail. Southwark's CIL will provide for infrastructure that supports growth in Southwark.

Other matters

155. No other matters identified.

Community involvement and engagement

156. The applicants have submitted a community engagement summary with the application detailing the community consultation engagement with that has been undertaken prior to the submission of the planning application.
157. The engagement summary outlines that the applicants met with ward councillors for the St Giles Ward on 3rd March 2019 and 18th December 2020 as well as meeting cabinet members for Culture, Leisure, Equalities on the 2nd May and Communities as well as planning and development on 17th April 2019, 16th December 2020 and 2nd February 2021 as well as the Cabinet Member for Leisure, Environment and Roads on 2nd February 2021.
158. The applicant team also met with the friends of Burgess Park on 28th March 2019 and 17th December 2020 as well as local residents which included the Wells Way Triangle Residents' Association and the Brunswick Park Tenants and Residents' Association on 19th January 2021.
159. The summary also outlines that public events were held on Wednesday 3rd April 2019 12pm – 4pm and Thursday 4th April 2019 4pm – 8pm and Wednesday 3rd July 2019 4pm – 8pm and Thursday 4th July 2019 4pm – 8pm. It notes that 98 and 70 people attended the vents respectively and notes that the main

areas of concern were in relation to the scale of the development and the development within MOL. The engagement summary also summarised the meetings held with council officers from the planning department and highways department.

160. The submitted engagement summary demonstrates that significant public consultation and engagement had taken place throughout the development of the proposals for the site.

Consultation responses from external and statutory consultees

161. MET police – Raised no objections, however they outline that the proposal should seek to meet the secure by design standards.
162. Environment Agency – Raised no objections to the proposal.
163. Thames Water – No objections raised.
164. Greater London Authority – Did not formally object to the proposal. Requested further information in relation to energy and overshadowing. They did not object to the principle of the development as they outlined that the proposed development is on previously developed land within MOL and GLA officers did not consider the spatial and visual impact would give rise to substantial harm to openness. However GLA officers did note that further discussion is required to determine what weight should be given to the Council's aspiration to CPO the site as set out in the Burgess Park Masterplan before an overall conclusion can be made in terms of the acceptability of the proposed development.
165. The GLA also noted that the proposed development would be acceptable in terms of scale and that it would not have an unacceptably harmful impact on the surrounding residential properties in relation to daylight, sunlight, privacy or overshadowing.
166. TfL – Raised no objections but requested further information in relation to London Plan Healthy Streets and requested that conditions be attached to any permission.

Community impact and equalities assessment

167. The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights
168. The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.
169. 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.
170. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership. Access to affordable housing disproportionately affects people from BAME backgrounds. The affordable housing provision within this scheme would therefore have a positive impact on groups with protected characteristics. Otherwise the scheme would not impact on any groups with protected characteristics.

Human rights implications

171. This planning application engages certain human rights under the Human Rights Act 2008 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.
172. This application has the legitimate aim of new affordable housing. The rights potentially engaged by this application, including the right to a fair trial and the right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

Positive and proactive statement

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

considerations indicate otherwise.

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

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

CONCLUSION

176. The site is situated within Metropolitan Open Land and as such is protected from unsuitable development in the same manner as Green Belt Land. Whilst it is noted that there would be some public benefit from the proposed development which includes affordable housing and land to be handed over to the park the NPPF is clear that even where a scheme is providing for affordable housing to meet an identified local need it should not create substantial harm to the openness of the MOL. In this instance the proposal is considered to be inappropriate development within MOL as it would have a significant harmful impact on the openness of MOL by reason of its scale, massing and location.
177. For these reasons it is recommended that planning permission is refused.

BACKGROUND INFORMATION

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Local Development Framework and Development Plan Documents	Chief Executive's 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 (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	Steve Platts, Director of Planning and Growth		
Report Author	Alexander Cameron		
Version			
Dated			
Key Decision	No		
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER			
Officer Title	Comments Sought	Comments included	
Strategic Director of Finance and Governance	No	No	
Strategic Director of Environment and Leisure	No	No	
Strategic Director of Housing and Modernisation	No	No	
Director of Regeneration	No	No	
Date final report sent to Constitutional Team		2 December 2021	

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	Burlington Developments	Reg. Number	21/AP/0451
Application Type	Major Application		
Recommendation	Refuse planning permission	Case Number	2229-A

Draft of Decision Notice

Refuse planning permission for the following development:

Proposal: Clearance of site and redevelopment to provide 32 homes and a flexible commercial (use class E) / community unit (Use Class F2) in a building ranging in height from three to seven storeys, along with cycle parking, refuse facilities and landscaped public realm including provision of land to be incorporated into Burgess Park.

At: 1-13 Southampton Way, London, Southwark, SE5 7SW

Refusal for the following reasons:

The proposal would result in inappropriate development within Metropolitan Open Land (MOL) would also result in a significant impact on the openness of MOL by way of the sites scale, massing and location abutting Burgess Park. As such the proposal is contrary to saved policy Saved Policy 3.25 - Metropolitan Open Land of the Southwark Plan 2008, Policy G3 Metropolitan Open Land of the London Plan 2021 and paragraphs 148 and 149 of the National Planning Policy Framework 2021.

Appendix 2 – Planning Policies:

National Policy

National Planning Policy Framework (NPPF) 2019 sets out the Government's planning policies for England and how they will be applied in terms of securing sustainable development. The NPPF is underpinned by a presumption in favour of sustainable development.

The Sections considered relevant to the proposal are set out as follows;

- Section 2 – Achieving sustainable development
- Section 5 – Delivering a sufficient supply of homes
- Section 9 – Promoting sustainable transport
- Section 11 – Making effective use of land
- Section 12 – Achieving well-designed places
- Section 13 – Protecting Greenbelt land

The NPPF highlights that good design is an integral part of sustainable development. New proposals should reflect this requirement for good design, as set out national, regional and local policy. The guidance further outlines that good design seeks to create places, buildings and spaces which work well for everyone and adapt to the needs of future generations.

The Technical Housing Standards

The Technical Housing Standards came into effect from 1 October 2015, after which all local planning policies relating to accessibility, internal space standards, water and energy efficiency must be in conformity with the equivalent new national standards.

The New London Plan

The London Plan policies considered relevant to the proposals are set out below;

- GG1 Building strong and inclusive communities
- GG2 Making the best use of land
- GG3 Creating a healthy city
- GG4 Delivering the homes Londoners need
- GG6 Increasing efficiency and resilience
- D1 London's form, character and capacity for growth
- D3 Optimising site capacity through the design led approach
- D4 Delivering good design
- D5 inclusive design
- D6 Housing quality and standards
- D7 Accessible housing
- D8 Public realm
- D11 Safety, security and resilience to emergency
- D12 Fire safety
- D14 Noise
- H1 Increasing housing supply
- H2 Small sites
- H4 Delivering affordable housing
- H5 Threshold approach to applications
- H6 Affordable housing tenure
- H7 Monitoring affordable housing
- H 10 Housing size mix
- H11 Build to rent

S4 Play and informal recreation
S5 Sports and recreation facilities
G1 Green infrastructure
G3 Metropolitan Open Land
G5 Urban greening
G7 Trees and woodlands
SI 1 Improving air quality
SI 2 Minimising greenhouse gas emissions
SI 4 Managing heat risk
SI 7 Waste capacity and supporting the circular economy
T2 Healthy streets
T4 Assessing and mitigating transport impacts
T5 Cycling
T6 Car parking
T6 1 Residential parking
T7 Deliveries, servicing and construction

Mayoral Supplementary Planning Guidance

Accessible London: Achieving an inclusive environment (2014)
Affordable housing and viability SPG
Housing SPG (2016)
Sustainable design and construction (2014)
Planning for equality and diversity (2007)
The Mayor's Transport Strategy (2018)
Climate change and energy strategy (2011)
Shaping neighbourhoods: Play and informal recreation (2012)
Shaping neighbourhoods: Character and context (2014)
Use of planning obligations in the funding of Crossrail, and the Mayoral Community Infrastructure Levy (2013)

Core Strategy 2011

Southwark's Core Strategy sets out the overall vision and strategic objectives for the borough.

Strategic Policy 1 Sustainable development
Strategic Policy 2 Sustainable transport
Strategic Policy 5 Providing new homes
Strategic Policy 6 Homes for people on different incomes
Strategic Policy 7 Family homes
Strategic Policy 11 Open Spaces and Wildlife
Strategic Policy 12 Design and Conservation
Strategic Policy 13 High Environmental standards
Strategic Policy 14 Implementation and delivery

Southwark Plan 2007

The relevant saved policies of the Southwark Plan are.

Policy 2.5 Planning obligations
Policy 3.1 Environmental effects
Policy 3.2 Protection of amenity
Policy 3.3 Sustainability assessment
Policy 3.4 energy efficiency
Policy 3.6 Air quality

Policy 3.7 Waste reduction
Policy 3.9 Water
Policy 3.11 Efficient use of land
Policy 3.12 Quality of accommodation
Policy 3.13 Urban design
Policy 3.14 Designing out crime
Policy 3.18 Setting of listed buildings, conservation areas and world heritage sites
Policy 3.25 Metropolitan Open Land
Policy 4.2 Quality of residential accommodation
Policy 4.3 Mix of dwellings
Policy 4.4 Affordable housing
Policy 4.5 Wheelchair affordable housing
Policy 5.2 Transport impacts
Policy 5.3 Walking and Cycling
Policy 5.6 Car parking
Policy 5.7 Parking standards for disabled people

Aylesbury Action Area Plan:
Policy PL5 Public Open Space
Policy PL6 Children's Play Space

Southwark Supplementary Planning Documents

The relevant supplementary planning guidance and documents to this proposal are:
Residential Design Standards SPD (2011)
Section 106 Planning obligations and Community infrastructure levy SPD (2015)
2015 Technical update to the residential design standards (2011)
Draft Affordable Housing SPD (2011)
Sustainable transport SPD 2010
Sustainability assessments SPD 2009
Sustainable design and construction SPD 2009

Emerging Policy

New Southwark Plan 2021

Strategic Policies

SP 1 Quality affordable homes
SP 2 Social regeneration to revitalise neighbourhoods
SP 6 Cleaner, greener, safer

DM Policies

SP 1 Quality affordable homes
SP2 Regeneration that works for all
SP5 Healthy, active lives
SP6 Cleaner, greener, safer
P1 Social rented and intermediate housing
P2 New family homes
P7 Wheelchair accessible and adaptable housing
P12 Design of places
P13 Design quality
P14 Residential design
P15 Designing out crime

P17 Efficient use of land
P44 Healthy developments
P46 Community uses
P48 Public transport
P49 Highway impacts
P50 Walking
P52 Cycling
P53 Car Parking
P54 Parking standards for disable people and mobility impaired people
P55 Protection of amenity
P56 Open Space
P59 Biodiversity
P60 Trees
P64 Improving air quality
P65 Reducing noise pollution and enhancing soundscapes
P66 Reducing water use
P68 Sustainability standards
P69 Energy
IP 3 Community infrastructure levy (CIL) and Section 106 Planning Obligations

Appendix 3: Relevant planning history

19/EQ/0311 – Pre-application advice was sought for

Appendix 4: Consultation undertaken

Site notice date: 29/03/2021

Press notice date: 18/03/2021

Case officer site visit date: 29/03/2021

Neighbour consultation letters sent: 15/03/2021

Internal services consulted

Ecology

Local Economy

Environmental Protection

Highways Development and Management

Transport Policy

Flood Risk Management & Urban Drainage

Urban Forester

Waste Management

Design and Conservation Team [Formal]

Statutory and non-statutory organisations

Environment Agency

Great London Authority

Metropolitan Police Service (Designing O

Thames Water

Neighbour and local groups consulted:

27 Southampton Way London Southwark

Flat 12 Barrett Court 1 Dobson Walk

Flat 11 Mori Court 61 Edmund Street

Flat 15 Palfrey Court 74 Edmund Street

Street Record Sugden Street London

Flat 31 Hambling Court 42 Southampton Way

25 Notley Street London Southwark

37 Addington Square London Southwark

21A Southampton Way London Southwark

44 Evelina Mansions New Church Road London

12 Evelina Mansions New Church Road London

Flat 2 Leslie Prince Court 50-52 New Church Road

Flat 4 54 Southampton Way London

Flat 13 Ayres Court 74 New Church Road

38 Draycott Close London Southwark

24 Sears Street London Southwark

20 Sears Street London Southwark

1-3 Southampton Way London Southwark

10 Chiswell Street London Southwark

Street Record Caldew Street London

49 - 65 Southampton Way London Southwark

Flat 11 60 Southampton Way London

Flat 3 83 New Church Road London

Street Record Addington Square London

39C Southampton Way London Southwark

Flat 1 54 Southampton Way London

Flat 20 Hogan Court 57 Edmund Street

Flat 12 Hogan Court 57 Edmund Street

20 Notley Street London Southwark

Flat 1 45 Southampton Way London

1A Sears Street London Southwark
39 Addington Square London Southwark
17B Southampton Way London Southwark
3 Evelina Mansions New Church Road London
51 Evelina Mansions New Church Road London
Flat 18 Ayres Court 74 New Church Road
Flat 24 Hodgkin Court 2 Dobson Walk
Flat 11 Barrett Court 1 Dobson Walk
42 Draycott Close London Southwark
Flat 13 Barrett Court 1 Dobson Walk
Flat 14 Ayres Court 74 New Church Road
Flat 12 Ayres Court 74 New Church Road
Flat 28 Hambling Court 42 Southampton Way
Flat 21 Hambling Court 42 Southampton Way
Flat 5 Hambling Court 42 Southampton Way
Flat 3 Hambling Court 42 Southampton Way
Flat 4 47 Southampton Way London
Flat 2 47 Southampton Way London
Flat 1 60 Southampton Way London
Flat 5 60 Southampton Way London
60 Southampton Way London Southwark
Burgess Park Albany Road London
42 New Church Road London Southwark
Flat 6 Mori Court 61 Edmund Street
Flat 8 Leigh Court 1 Sam King Walk
8 Evelina Mansions New Church Road London
65 Evelina Mansions New Church Road London
9 Parkhouse Street London Southwark
Flat 9 23 Chiswell Street London
Flat 3 23 Chiswell Street London
Flat 7 60 Southampton Way London
Unit 6 First Floor Burgess Industrial Estate Parkhouse Street

17 Chiswell Street London Southwark
12 Chiswell Street London Southwark
52 Southampton Way London Southwark
44 Southampton Way London Southwark
15A Sears Street London Southwark
Flat 2 83 New Church Road London
Lake Portacabins Burgess Park Albany Road
Flat 1 83 New Church Road London
Flat 10 23 Chiswell Street London
Flat 5 23 Chiswell Street London
Flat 2 23 Chiswell Street London
16 Chiswell Street London Southwark
15 Edmund Street London Southwark
34 Southampton Way London Southwark
7 Parkhouse Street London Southwark
45 Southampton Way London Southwark
45 Evelina Mansions New Church Road London
Flat 4 37 Addington Square London
72 Evelina Mansions New Church Road London
40 New Church Road London Southwark
Flat 12 Palfrey Court 74 Edmund Street
Flat 3 Hogan Court 57 Edmund Street
Flat 17 Ayres Court 74 New Church Road
Flat 10 Hambling Court 42 Southampton Way
Flat 2 Leigh Court 1 Sam King Walk
17 Notley Street London Southwark
46 Southampton Way London Southwark
35 Addington Square London Southwark
1 Sears Street London Southwark
15A Southampton Way London Southwark
Flat 30 Hodgkin Court 2 Dobson Walk
Flat 4 Palfrey Court 74 Edmund Street

Mori Court 61 Edmund Street London
5-7 Southampton Way London Southwark
Flat A 25 Southampton Way London
6 Sears Street London Southwark
16 Sears Street London Southwark
Flat A 20 Sears Street London
37 Southampton Way London Southwark
23 Southampton Way London Southwark
15B Southampton Way London Southwark
Flat D 36 Addington Square London
Flat B 20 Sears Street London
60 Evelina Mansions New Church Road London
Flat C 20 Sears Street London
43B Southampton Way London Southwark
9 Evelina Mansions New Church Road London
32 Evelina Mansions New Church Road London
18 Evelina Mansions New Church Road London
15 Evelina Mansions New Church Road London
66 Evelina Mansions New Church Road London
33B Southampton Way London Southwark
Flat 3 37 Addington Square London
47 Evelina Mansions New Church Road London
4 Evelina Mansions New Church Road London
63 Evelina Mansions New Church Road London
Flat 24 Ayres Court 74 New Church Road
Flat 5 Leslie Prince Court 50-52 New Church Road
Flat 32 Hambling Court 42 Southampton Way
Flat 27 Hambling Court 42 Southampton Way
Flat 15 Ayres Court 74 New Church Road
Flat 21 Ayres Court 74 New Church Road
Development Site At Southampton Way Notley Street And Edmund Street London
Flat 24 Leigh Court 1 Sam King Walk

Flat 21 Leigh Court 1 Sam King Walk
Flat 6 Hambling Court 42 Southampton Way
Flat 15 Hodgkin Court 2 Dobson Walk
Flat 7 Hodgkin Court 2 Dobson Walk
Unit 6 Ground Floor Burgess Industrial Estate Parkhouse Street
14 Chiswell Street London Southwark
9-11 Southampton Way London Southwark
40 Draycott Close London Southwark
Street Record New Church Road London
Flat 5 Ayres Court 74 New Church Road
Flat 7 Hogan Court 57 Edmund Street
3 Sears Street London Southwark
25 Chiswell Street London Southwark
21 Chiswell Street London Southwark
Flat 3 45 Southampton Way London
15-19 Parkhouse Street London Southwark
Evelina Mansions New Church Road London
28 Notley Street London Southwark
24 Notley Street London Southwark
Flat 4 Ayres Court 74 New Church Road
Flat 31 Hogan Court 57 Edmund Street
Flat 7 54 Southampton Way London
26 Notley Street London Southwark
Flat B 25 Southampton Way London
Flat 2 45 Southampton Way London
Street Record Southampton Way London
50 Southampton Way London Southwark
48 Southampton Way London Southwark
66 Edmund Street London Southwark
43 Southampton Way London Southwark
Flat 28 Hogan Court 57 Edmund Street
Flat 4 Hogan Court 57 Edmund Street

Street Record Sears Street London
Flat 7 23 Chiswell Street London
29 Southampton Way London Southwark
10 Sears Street London Southwark
Flat 7 Barrett Court 1 Dobson Walk
Flat 24 Hogan Court 57 Edmund Street
39A Southampton Way London Southwark
8 Sears Street London Southwark
19 Evelina Mansions New Church Road London
Flat 22 Leigh Court 1 Sam King Walk
Flat 2 Kitaj Court 59 Edmund Street
Flat 24 Sunset Buildings 76 Edmund Street
Flat 5 Sunset Buildings 76 Edmund Street
Flat 2 Hambling Court 42 Southampton Way
Unit 9 2-10 Parkhouse Street London
36 Addington Square London Southwark
13 Sears Street London Southwark
5A Parkhouse Street London Southwark
28 Evelina Mansions New Church Road London
22 Evelina Mansions New Church Road London
2 Evelina Mansions New Church Road London
56 Evelina Mansions New Church Road London
Flat 7 Leslie Prince Court 50-52 New Church Road
Flat 7 Ayres Court 74 New Church Road
Flat 2 Hodgkin Court 2 Dobson Walk
Flat 2 Ayres Court 74 New Church Road
Flat 10 Leigh Court 1 Sam King Walk
Flat 8 Barrett Court 1 Dobson Walk
Hodgkin Court 2 Dobson Walk London
Flat 1 Mori Court 61 Edmund Street
Flat 12 Sunset Buildings 76 Edmund Street
Flat 7 Sunset Buildings 76 Edmund Street

Flat 17 Hogan Court 57 Edmund Street
Street Record Draycott Close London
29A Southampton Way London Southwark
23A Southampton Way London Southwark
Flat 1 37 Addington Square London
11 Parkhouse Street London Southwark
47 Southampton Way London Southwark
34 Evelina Mansions New Church Road London
33 Evelina Mansions New Church Road London
14 Evelina Mansions New Church Road London
70 Evelina Mansions New Church Road London
67 Evelina Mansions New Church Road London
52 Evelina Mansions New Church Road London
49 Evelina Mansions New Church Road London
83 New Church Road London Southwark
5 Sam King Walk London Southwark
Flat 28 Hodgkin Court 2 Dobson Walk
Flat 27 Hodgkin Court 2 Dobson Walk
Flat 3 Hodgkin Court 2 Dobson Walk
Flat 1 Barrett Court 1 Dobson Walk
Flat 16 Mori Court 61 Edmund Street
Flat 23 Sunset Buildings 76 Edmund Street
Flat 3 Sunset Buildings 76 Edmund Street
Flat 20 Palfrey Court 74 Edmund Street
Flat 30 Hogan Court 57 Edmund Street
Flat 27 Hogan Court 57 Edmund Street
Flat 19 Hogan Court 57 Edmund Street
Flat 8 Palfrey Court 74 Edmund Street
Flat 15 Mori Court 61 Edmund Street
Flat 10 Sunset Buildings 76 Edmund Street
Flat 2 Sunset Buildings 76 Edmund Street
20 Addington Square London Southwark

16 Addington Square London Southwark
14 Sears Street London Southwark
11 Sears Street London Southwark
41 Southampton Way London Southwark
19 Southampton Way London Southwark
2 Parkhouse Street London Southwark
46 Evelina Mansions New Church Road London
21 Evelina Mansions New Church Road London
1 Evelina Mansions New Church Road London
Flat 1 47 Southampton Way London
Flat 13 Hogan Court 57 Edmund Street
Flat 6 Hogan Court 57 Edmund Street
19 Chiswell Street London Southwark
Flat 3 17 Addington Square London
Block C Evelina Mansions New Church Road
Flat 8 60 Southampton Way London
33A Southampton Way London Southwark
4 Sears Street London Southwark
26 Evelina Mansions New Church Road London
Flat 19 Hodgkin Court 2 Dobson Walk
Flat 14 Sunset Buildings 76 Edmund Street
27A Southampton Way London Southwark
18 Chiswell Street London Southwark
Flat 29 Hodgkin Court 2 Dobson Walk
Flat 12 Hodgkin Court 2 Dobson Walk
Flat 18 Hogan Court 57 Edmund Street
Sunset Buildings 76 Edmund Street London
Flat 20 Hambling Court 42 Southampton Way
12A Sears Street London Southwark
Flat B 24 Sears Street London
13 Parkhouse Street London Southwark
19 Addington Square London Southwark

48A New Church Road London Southwark
13A Parkhouse Street London Southwark
6 Evelina Mansions New Church Road London
42 Evelina Mansions New Church Road London
71 Evelina Mansions New Church Road London
Flat 10 Leslie Prince Court 50-52 New Church Road
Flat 24 Hambling Court 42 Southampton Way
Flat 13 Leigh Court 1 Sam King Walk
Flat 32 Hodgkin Court 2 Dobson Walk
Flat 4 Kitaj Court 59 Edmund Street
Flat 4 Mori Court 61 Edmund Street
Flat 1 Hogan Court 57 Edmund Street
Flat 6 23 Chiswell Street London
Flat 4 83 New Church Road London
Street Record Chiswell Street London
11A Sears Street London Southwark
1A Parkhouse Street London Southwark
19A Southampton Way London Southwark
17A Southampton Way London Southwark
34 Addington Square London Southwark
9 Sears Street London Southwark
7 Sears Street London Southwark
25 Southampton Way London Southwark
21 Southampton Way London Southwark
12 Parkhouse Street London Southwark
30 Evelina Mansions New Church Road London
23 Evelina Mansions New Church Road London
11 Evelina Mansions New Church Road London
Flat 5 37 Addington Square London
61 Evelina Mansions New Church Road London
59 Evelina Mansions New Church Road London
Flat 2 17 Addington Square London

46 New Church Road London Southwark
Flat 6 54 Southampton Way London
Flat 11 Leigh Court 1 Sam King Walk
Flat 5 Leigh Court 1 Sam King Walk
Flat 4 Leigh Court 1 Sam King Walk
Flat 3 Kitaj Court 59 Edmund Street
Flat 8 Sunset Buildings 76 Edmund Street
Kitaj Court 59 Edmund Street London
Flat 19 Ayres Court 74 New Church Road
Flat 16 Ayres Court 74 New Church Road
Ayres Court 74 New Church Road London
Flat 18 Hambling Court 42 Southampton Way
Flat B 5 Sears Street London
Flat A 5 Sears Street London
Flat 3 60 Southampton Way London
Flat 12 60 Southampton Way London
Flat 16 Leigh Court 1 Sam King Walk
3 Sam King Walk London Southwark
Flat 16 Hambling Court 42 Southampton Way
Flat 10 Hodgkin Court 2 Dobson Walk
Street Record Dobson Walk London
19B Southampton Way London Southwark
33 Addington Square London Southwark
26 Sears Street London Southwark
31 Southampton Way London Southwark
17 Southampton Way London Southwark
7 Evelina Mansions New Church Road London
10 Parkhouse Street London Southwark
43 Evelina Mansions New Church Road London
41 Evelina Mansions New Church Road London
38 Evelina Mansions New Church Road London
29 Evelina Mansions New Church Road London

16 Evelina Mansions New Church Road London
Flat 2 37 Addington Square London
21-23 Parkhouse Street London Southwark
58 Evelina Mansions New Church Road London
Flat 3 Leslie Prince Court 50-52 New Church Road
Flat 1 17 Addington Square London
48 New Church Road London Southwark
31 Notley Street London Southwark
44 New Church Road London Southwark
Flat 9 Leslie Prince Court 50-52 New Church Road
Flat 6 Leslie Prince Court 50-52 New Church Road
Flat B 36 Addington Square London
Flat 3 54 Southampton Way London
Flat 1 Leigh Court 1 Sam King Walk
Flat 22 Hodgkin Court 2 Dobson Walk
Flat 1 Hodgkin Court 2 Dobson Walk
Street Record Sam King Walk London
Flat 6 Barrett Court 1 Dobson Walk
Flat 19 Sunset Buildings 76 Edmund Street
Flat 13 Sunset Buildings 76 Edmund Street
Flat 6 Sunset Buildings 76 Edmund Street
Flat 6 Palfrey Court 74 Edmund Street
Flat 29 Hogan Court 57 Edmund Street
Flat 11 Hogan Court 57 Edmund Street
Flat 5 Hogan Court 57 Edmund Street
Flat 6 Ayres Court 74 New Church Road
Flat 25 Hambling Court 42 Southampton Way
Flat 7 Hambling Court 42 Southampton Way
Flat 5 83 New Church Road London
Flat 4 23 Chiswell Street London
56 Southampton Way London Southwark
Leslie Prince Court 50-52 New Church Road London

Flat 15 Leigh Court 1 Sam King Walk
35 Evelina Mansions New Church Road London
9A Sears Street London Southwark
55 Evelina Mansions New Church Road London
Flat 4 Leslie Prince Court 50-52 New Church Road
Flat 22 Ayres Court 74 New Church Road
42 Addington Square London Southwark
Flat A 24 Sears Street London
41A Southampton Way London Southwark
37 Evelina Mansions New Church Road London
10 Evelina Mansions New Church Road London
54 Evelina Mansions New Church Road London
Unit 7 Burgess Industrial Park Parkhouse Street
Flat 10 Ayres Court 74 New Church Road
Flat 34 Hambling Court 42 Southampton Way
27 Notley Street London Southwark
Flat 3 Leigh Court 1 Sam King Walk
Flat 5 Barrett Court 1 Dobson Walk
Flat 17 Hodgkin Court 2 Dobson Walk
Flat 23 Leigh Court 1 Sam King Walk
Flat 31 Hodgkin Court 2 Dobson Walk
Flat 20 Hodgkin Court 2 Dobson Walk
Flat 16 Hodgkin Court 2 Dobson Walk
Flat 9 Hodgkin Court 2 Dobson Walk
Flat 8 Hodgkin Court 2 Dobson Walk
Flat 14 Barrett Court 1 Dobson Walk
Flat 2 Barrett Court 1 Dobson Walk
Flat 8 Mori Court 61 Edmund Street
Flat 5 Mori Court 61 Edmund Street
Flat 21 Sunset Buildings 76 Edmund Street
Flat 18 Sunset Buildings 76 Edmund Street
Flat 22 Palfrey Court 74 Edmund Street

Flat 14 Palfrey Court 74 Edmund Street
Flat 11 Palfrey Court 74 Edmund Street
Flat 14 Hogan Court 57 Edmund Street
Flat 20 Ayres Court 74 New Church Road
Flat 9 Ayres Court 74 New Church Road
Flat 23 Hambling Court 42 Southampton Way
Flat 8 Hambling Court 42 Southampton Way
Flat 13 Palfrey Court 74 Edmund Street
Flat 12 Mori Court 61 Edmund Street
Flat 15 Sunset Buildings 76 Edmund Street
Flat 5 Palfrey Court 74 Edmund Street
Flat 23 Hogan Court 57 Edmund Street
Flat 9 Hogan Court 57 Edmund Street
Flat 4 60 Southampton Way London
12B Sears Street London Southwark
41B Southampton Way London Southwark
23B Southampton Way London Southwark
41 Addington Square London Southwark
27 Evelina Mansions New Church Road London
24 Evelina Mansions New Church Road London
13 Evelina Mansions New Church Road London
50 Evelina Mansions New Church Road London
Flat 8 Leslie Prince Court 50-52 New Church Road
Flat 1 Leslie Prince Court 50-52 New Church Road
Flat 20 Leigh Court 1 Sam King Walk
2 Sam King Walk London Southwark
Leigh Court 1 Sam King Walk London
Flat 11 Hodgkin Court 2 Dobson Walk
Flat 9 Barrett Court 1 Dobson Walk
Flat 13 Mori Court 61 Edmund Street
Flat 11 Sunset Buildings 76 Edmund Street
Flat 9 Sunset Buildings 76 Edmund Street

Flat 18 Palfrey Court 74 Edmund Street
Flat 9 Palfrey Court 74 Edmund Street
Flat 10 Hogan Court 57 Edmund Street
Flat 1 Ayres Court 74 New Church Road
Flat 30 Hambling Court 42 Southampton Way
Flat 11 23 Chiswell Street London
Flat 10 60 Southampton Way London
22 Notley Street London Southwark
Flat 6 Leigh Court 1 Sam King Walk
Flat 9 Mori Court 61 Edmund Street
36 Evelina Mansions New Church Road London
Flat 1 23 Chiswell Street London
15B Sears Street London Southwark
25 Evelina Mansions New Church Road London
68 Evelina Mansions New Church Road London
Flat 29 Hambling Court 42 Southampton Way
Flat 18 Leigh Court 1 Sam King Walk
Flat 19 Hambling Court 42 Southampton Way
Flat 9 Hambling Court 42 Southampton Way
Flat 4 Hambling Court 42 Southampton Way
Flat 26 Hodgkin Court 2 Dobson Walk
Flat 6 60 Southampton Way London
Flat 22 Hambling Court 42 Southampton Way
Flat 14 Hambling Court 42 Southampton Way
Flat 1 Kitaj Court 59 Edmund Street
Flat 21 Palfrey Court 74 Edmund Street
7A Parkhouse Street London Southwark
39B Southampton Way London Southwark
38 Addington Square London Southwark
3 Parkhouse Street London Southwark
1 Parkhouse Street London Southwark
Flat A 36 Addington Square London

22 Sears Street London Southwark
39 Southampton Way London Southwark
5 Evelina Mansions New Church Road London
20 Evelina Mansions New Church Road London
64 Evelina Mansions New Church Road London
21 Addington Square London Southwark
57 Evelina Mansions New Church Road London
53 Evelina Mansions New Church Road London
Flat 12 Leslie Prince Court 50-52 New Church Road
35A Addington Square London Southwark
23 Notley Street London Southwark
Flat 19 Leigh Court 1 Sam King Walk
Flat 17 Leigh Court 1 Sam King Walk
Flat 14 Hodgkin Court 2 Dobson Walk
Flat 6 Hodgkin Court 2 Dobson Walk
Flat 4 Barrett Court 1 Dobson Walk
Flat 16 Sunset Buildings 76 Edmund Street
Flat 17 Palfrey Court 74 Edmund Street
Flat 7 Palfrey Court 74 Edmund Street
Flat 26 Hogan Court 57 Edmund Street
Flat 22 Hogan Court 57 Edmund Street
Flat 16 Hogan Court 57 Edmund Street
Hogan Court 57 Edmund Street London
Flat 15 Hambling Court 42 Southampton Way
Flat 1A 60 Southampton Way London
23 Chiswell Street London Southwark
19 Notley Street London Southwark
6 Sam King Walk London Southwark
Flat 11 Hambling Court 42 Southampton Way
Flat 13 Hodgkin Court 2 Dobson Walk
Flat 5 Hodgkin Court 2 Dobson Walk
Flat 3 Barrett Court 1 Dobson Walk

Flat 1 Hambling Court 42 Southampton Way
Flat 21 Hodgkin Court 2 Dobson Walk
Flat 18 Hodgkin Court 2 Dobson Walk
Flat 4 Sunset Buildings 76 Edmund Street
Flat 19 Palfrey Court 74 Edmund Street
Flat 16 Palfrey Court 74 Edmund Street
Flat 25 Hogan Court 57 Edmund Street
Flat 15 Hogan Court 57 Edmund Street
63 Edmund Street London Southwark
3A Sears Street London Southwark
11B Sears Street London Southwark
11A Parkhouse Street London Southwark
43A Southampton Way London Southwark
40 Addington Square London Southwark
5 Parkhouse Street London Southwark
5 Sears Street London Southwark
18 Sears Street London Southwark
31 Evelina Mansions New Church Road London
18 Addington Square London Southwark
Flat 14 Leigh Court 1 Sam King Walk
Flat 9 Leigh Court 1 Sam King Walk
4 Sam King Walk London Southwark
Flat 25 Hodgkin Court 2 Dobson Walk
Flat 23 Hodgkin Court 2 Dobson Walk
Flat 4 Hodgkin Court 2 Dobson Walk
Barrett Court 1 Dobson Walk London
Flat 5 Kitaj Court 59 Edmund Street
Flat 14 Mori Court 61 Edmund Street
Flat 2 Mori Court 61 Edmund Street
Flat 1 Sunset Buildings 76 Edmund Street
Flat 3 Palfrey Court 74 Edmund Street
Flat 21 Hogan Court 57 Edmund Street

Flat 8 Hogan Court 57 Edmund Street
Flat 2 Hogan Court 57 Edmund Street
Flat 23 Ayres Court 74 New Church Road
Flat 11 Ayres Court 74 New Church Road
Flat 8 Ayres Court 74 New Church Road
Flat 3 Ayres Court 74 New Church Road
Flat 33 Hambling Court 42 Southampton Way
Flat 26 Hambling Court 42 Southampton Way
Flat 17 Hambling Court 42 Southampton Way
Flat 13 Hambling Court 42 Southampton Way
Flat 12 Hambling Court 42 Southampton Way
Hambling Court 42 Southampton Way London
Flat 8 23 Chiswell Street London
Flat 2 60 Southampton Way London
54 Southampton Way London Southwark
35A-35B Southampton Way London Southwark
Flat 20 Sunset Buildings 76 Edmund Street
Flat 22 Sunset Buildings 76 Edmund Street
Flat 17 Sunset Buildings 76 Edmund Street
Flat 10 Palfrey Court 74 Edmund Street
Flat 2 Palfrey Court 74 Edmund Street
Flat 9 60 Southampton Way London
Flat 3 47 Southampton Way London
17 Addington Square London Southwark
9A Parkhouse Street London Southwark
3A Parkhouse Street London Southwark
31A Southampton Way London Southwark
15C Southampton Way London Southwark
15 Sears Street London Southwark
12 Sears Street London Southwark
35 Southampton Way London Southwark
33 Southampton Way London Southwark

48 Evelina Mansions New Church Road London

40 Evelina Mansions New Church Road London

39 Evelina Mansions New Church Road London

17 Evelina Mansions New Church Road London

69 Evelina Mansions New Church Road London

62 Evelina Mansions New Church Road London

3B Sears Street London Southwark

Flat C 36 Addington Square London

Flat 5 54 Southampton Way London

Flat 2 54 Southampton Way London

29 Notley Street London Southwark

21 Notley Street London Southwark

Flat 12 Leigh Court 1 Sam King Walk

1B Sears Street London Southwark

Flat 7 Leigh Court 1 Sam King Walk

Flat 10 Barrett Court 1 Dobson Walk

Flat 10 Mori Court 61 Edmund Street

Flat 3 Mori Court 61 Edmund Street

Flat 1 Palfrey Court 74 Edmund Street

Palfrey Court 74 Edmund Street London

Appendix 5: Consultation responses received

Internal services

Ecology

Environmental Protection

Highways Development and Management

Transport Policy

Urban Forester

Design and Conservation Team

Statutory and non-statutory organisations

Metropolitan Police Service

Thames Water

Greater London Authority

Transport for London

Environment Agency

Neighbour and local groups consulted:

621 responses received.