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Item No. 5.2	Classification: Open	Date: 4 October 2022	Meeting Name: Planning Committee
Report title:	Development Management planning application: Application 21/AP/4757 for: FULL PLANNING APPLICATION Address: ILDERTON WHARF, 1-7 ROLLINS STREET, LONDON SE15 1EP Proposal: Demolition of existing buildings and erection of a mixed use development comprising a building of part 9, 23 and 25 storeys above ground to provide a replacement builders merchants with associated office, trade counter sales area, showroom and external storage/racking, a commercial unit fronting Ilderton Road (Use Class E) 170 residential apartments (Use Class C3) and other associated infrastructure.		
Ward(s) or groups affected:	Old Kent Road		
From:	DIRECTOR OF PLANNING AND GROWTH		
Application Start Date	21/01/2022	Application Expiry Date	22/04/2022
Earliest Decision Date	21/03/2022		

RECOMMENDATIONS

1. That planning permission be granted, subject to conditions and referral to the Mayor of London, and the applicant entering into an appropriate legal agreement by no later than 4 April 2023.
2. In the event that the requirements of (1.) are not met by 4 April 2023 that the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reasons set out at paragraph 295 of this report.

EXECUTIVE SUMMARY

3. The proposals involve the demolition of the existing Jewson builders' merchants and the construction of a building of two conjoined blocks to provide a mixed-use development incorporating a new facility for Jewson, as well as new homes, amenity spaces and improvements to the public realm.

4. The replacement builders' merchants has been designed by Jewson to meet their changing operational requirements. Compared to the existing facility, a larger double-height covered yard is proposed (including a mezzanine office area), with a smaller external yard to make more efficient use of the site. The space has also been designed to be flexible enough to accommodate a variety of industrial occupiers in the future should Jewson decide to vacate the site.
5. The proposals will provide 61 affordable homes and 109 market homes. The overall quantum of affordable housing would be 40.3% by habitable room (including 25.3% social rent) which exceeds policy requirements.
6. The quality of the proposed residential accommodation is considered to be good, meeting or exceeding the minimum space standards and providing 58.24% dual aspect accommodation. The proposal also provides a range of housing choices from one to four-bedroom properties, including 20.6% family homes (including 14 four-bedroom homes within the social rent), and 10.5% wheelchair housing by habitable room.
7. All residential units have access to large private amenity spaces in the form of balconies or winter gardens. The scheme also benefits from two communal amenity spaces (which comfortably accommodates all children's play space requirements) which are accessible to all residents within the development. The scheme also provides additional public realm with planting to allow for a safer and more attractive pedestrian environment around the site.
8. The scheme will be car free other than for a number of disabled parking spaces, an on-site residential loading bay, and a reduced number of retained spaces for Jewson staff and customers, with electric vehicle charging points provided throughout. The proposals also provide cycle parking in compliance with policy.
9. The proposals will achieve 70% on-site carbon emissions, with the deficit being captured by way of a financial contribution. The proposal involves the loss of four trees (two Category B and two Category C trees), albeit 21 new trees with greater variety, as well as physical and visual value are proposed, with conditions to secure adequate replacement and protection measures.
10. The application has resulted in one public objection. The key issue raised by the objector related to the development of more homes in the area in general terms.
11. The proposal is strongly supported by officers based on the reprovision of the existing Jewson facility to a higher specification, the high level of affordable housing proposed, as well as the excellent quality of accommodation, provision of the additional and enhanced public realm, and the overall design standards proposed. It is on this basis that the development is considered to be in conformity with the development plan when read as a whole (see full list of policies in Appendix 2 of this report) and is recommended for approval, subject to conditions and the completion of a suitable legal agreement.

Housing

12.

	Block A		Block B				Total		
	Social Rent		Intermediate		Private				
	Units	HR	Units	HR	Units	HR	Units	HR	%
1-Bed	5	10	8	16	40	80	53	106	31.2%
2-Bed	16	48	12	36	54	162	82	246	48.2%
3-Bed	0	0	6	24	15	60	21	84	12.4%
4-Bed	14	70	0	0	0	0	14	70	8.2%
	35	128	26	76	109	302	170	506	100%
Affordable Housing (By habitable room)	40.3% overall								

13. Non-residential

	Existing sqm	Proposed sqm
Internal GIA (<i>sui generis</i>)	657.7	890.6 sqm
External Yard GEA (<i>sui generis</i>)	2478.9	1059.1 sqm
Commercial GIA (E)	-	97.3 sqm

14. Amenity and Child Play Space

	Required sqm	Proposed sqm
Private Amenity Space	1,700 sqm	1,603.4 sqm
Communal Amenity Space	50 sqm	193 sqm
Child Play Space	757.3 sqm	757.3 sqm

15. Environmental

CO2 savings beyond Part L Bldg. Regs.	66%
Trees lost	4 (Cat B/C)
Trees gained	21

	Existing	Proposed	Change +/-
Urban Greening Factor Score	Negligible	0.43	+ 0.43
Surface Water Run Off Rate	12.3 l/s	1.5 l/s	- 10.8 l/s
Green/Brown Roofs	0	491.38 sqm	+ 491.38 sqm
EVCPS (on site)	0	6	+ 6
Residential Cycle Parking Spaces	0	322 long-stay 6 short-stay	+ 328
Commercial Cycle Parking	0	8 long-stay 4 short-stay	+ 12
Commercial Car Parking	16	8	-8

16. CIL and S106 contributions

SCIL (estimated)	£5,334,253.69 (Pre-Relief)
MCIL (estimated)	£3,283,173.16
S106	Approximately £1,014,303m

BACKGROUND INFORMATION

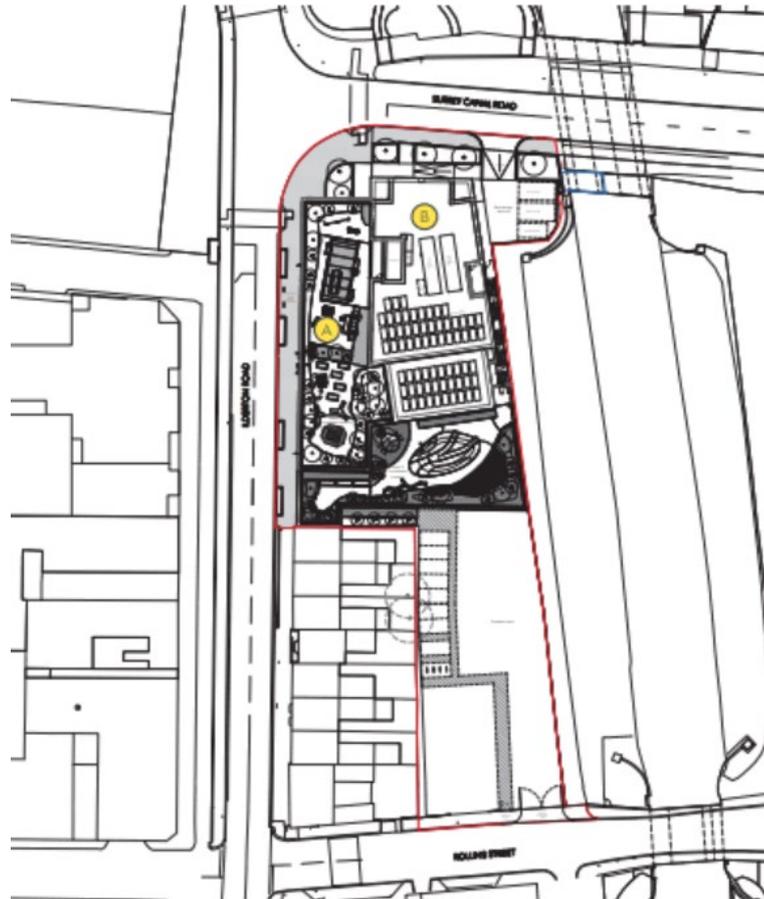
Site location and description

17. The subject site is located at the junction along Ilderton Road, Surrey Canal Road and Rollins Street, and abuts the railway line connecting London Bridge to the southern

areas of London. The existing site is occupied by the builders' merchants, Jewson. It comprises a double-height shed, single-storey sales unit and an external working yard. Some parts of the site front onto Ilderton Road, mainly the northwest section, with the remainder of the site tucked in behind one of the last remaining terraced rows along Ilderton Road.

18. There is a slight change in natural ground level when moving from south to north past or through the site. At the north-east corner of the site on the Surrey Canal Road elevation there is a change in natural ground level as the highway goes under the railway viaduct and into the council boundaries of neighbouring Lewisham Borough.
19. The existing site is accessed from the south via a gate on Rollins Street. This is the only point of access into the site for both vehicles and pedestrians. All other site boundaries are either fenced or have brick walls to the perimeter. This creates a very poor relationship with Ilderton Road and Surrey Canal Road. To the north of the site is a recently opened pocket park, Pat Hickson Gardens, which marks the end of the east-west cycle path that travels along Surrey Canal Road.
20. To the south of the subject site is the former Leathams building which received planning permission for significant redevelopment of the site under reference 19/AP/1773. This proposal is currently in its beginning stages of development, and the scheme is similar in height to this application, and also provides residential above industrial uses on lower ground floors of the scheme.
21. The subject site is located within Sub Area 4 (Hatcham, Ilderton and Old Kent Road (South) and specifically within Site Allocation OKR 16) of the Old Kent Road Area Action Plan (OKR AAP). The site is designated as a Locally Significant Industrial Site (LSIS) as per Southwark's current Proposals Map and as a Strategic Industrial Location (SIL) as per the adopted London Plan 2021.
22. The site is within an Urban Density Zone and an Air Quality Management Area. The site is located in Flood Zone 3 as identified by the Environment Agency. Additionally, the site is designated as being within the North Southwark and Roman Roads' Tier 1 Archaeological Priority Area. The site is not within a Conservation Area, nor are there any listed buildings on or within close proximity to the site.
23. Transport for London's (TfL) Public Transport Accessibility Level (PTAL) provides a score of 1-6b to rate areas within London and their accessibility to public transport options. A score of 1 represents the lowest accessibility with 6b being the best locations of accessibility to public transport. The subject site is rated as 2 on the PTAL system indicating poor accessibility to public transport. However, South Bermondsey railway station is approximately 600m north of the site (where there are 15-minute frequency services to London Bridge), while the P12 bus service which runs along Ilderton Road provides service to Surrey Quays.

Image: Site plan



Details of proposal

24. Planning permission is sought for the demolition of existing buildings and erection of a mixed use development comprising a building of part 9, 23 and 25 storeys above ground to provide a replacement builders merchants with associated office, trade counter sales area, showroom and external storage/racking, a commercial unit fronting Ilderton Road (Use Class E), 170 residential apartments (Use Class C3), and other associated infrastructure.
25. As part of the comprehensive redevelopment of the site, the existing occupier, Jewson, will remain on site. The replacement builders' merchant's space has been specifically designed by Jewson to meet their own unique and changing operational requirements. Compared to the existing building on site, a larger double-height covered yard is proposed (including a mezzanine office/sales area) with a smaller external yard to make more efficient use of the site. The space has also been designed to be flexible enough to accommodate a variety of industrial occupiers in the future should Jewson decide to leave the site.

26. During the construction phase of the development, Jewson will maintain a presence in the southern half of the site through the temporary retention of the sales building whilst the predominant section of development at the northern section of the site is completed. The replacement builders' merchants will be supported by a total of eight parking spaces within the external yard (including one accessible car parking bay) similar to the existing arrangement; alongside 12 cycle parking spaces (eight long-stay spaces in a shelter within the external yard, and four short-stay spaces on Ilderton Road).
27. Children's playspace within the scheme is to be located at first floor podium level and on the eighth floor terrace, and comprises of 757.3sqm. The playspace will provide a variety of informal and imaginative play areas throughout the podium and terrace levels. Communal amenity is proposed on both the first floor podium, and the eighth floor terrace, amounting to 193sqm. The locations of the amenity spaces at the south and southwest of the building envelope enables these areas to maximise natural daylight and sunlight into the amenity spaces.
28. Cycle Parking will be provided in accordance with the London Plan and New Southwark Plan requirements. 322 secure cycle parking spaces are proposed for future residents of the development, located at lower ground floor, and upper ground floor. In addition to this, 6 visitor parking spaces are to be located near to the residential entrance to Block B on the Surrey Canal Road frontage. The proposed development is to be car-free and occupants of the development who are Blue Badge holders would be eligible for a Residents Parking Permit.
29. Refuse and recycling facilities will be provided at lower ground floor level with capacity for ten 1100L Eurobins consisting of six refuse bins, and four recycling bins for Block A. The refuse arrangement for Block B consists of twenty five 1100L Eurobins comprising of fifteen for general waste and ten for recycling purposes.
30. 170 residential units are proposed comprising of a mix of 53 one bedroom units, 82 two bedroom units, 21 three bedroom units, and 14 four bedroom units (Use Class C3). There are no north facing single aspect units within the scheme, with circa 60% of units being dual aspect, including all family sized units. Residents will access the units from an entrance lobby for each block from Surrey Canal Road. Two lifts are provided for Block A residents, and three lifts are provided for Block B residents to ensure that the building continues to be fully accessible in the event of one lift breaking. Additionally, one staircase for each block is centrally located on the lower ground floor level to provide access to the upper floors.
31. The development proposes 40.3% affordable housing by habitable room comprising of 25.3% social rent, and 15% intermediate. All four bedroom homes are provided in the social rent provision within the scheme. In total, 35 units are proposed for social rent, and 26 units are proposed for the intermediate affordable tenure. This amounts to 61 of the units being offered as affordable housing.

Table: Proposed land uses

Land Use	Use Class	GIA
Residential	C3	11,782.70sqm
Commercial	<i>Sui generis</i>	890.6sqm
	E	97.3sqm

Revisions and amendments

32. Whilst no design or alterations to the total number of residential units has occurred during the lifespan of this application, additional information regarding some areas of assessment was submitted. The documents were submitted in light of comments received from consultee comments. In acknowledging the further documents, and the nature of the information received re-consultation of the scheme was not required.
33. The documents of additional information submitted during the course of this application were as follows:
- Landscape Strategy and Urban Greening Factor
 - Flood Risk Assessment
 - Whole Life-Cycle Carbon Assessment
 - Circular Economy Statement
 - Energy Statement
 - Additional noise and vibration impact assessment information
 - Additional dynamic overheating information
 - Additional bird and bat box locations information
 - Additional cycle storage information
 - Rollins Street Road Safety Audit

Consultation responses from members of the public

34. One representation has been received raising an objection to the proposed development. The nature of the objection is summarised in the table below.

Table: Public comments on the development

Objection	Officer Response
<u>Addition of homes and impact on surrounding area</u> : Concern raised over development of more homes in the area in general terms	The development site has been identified within the OKR AAP, the Southwark Plan, and London Plan as a site allocation and an opportunity of where industrial/commercial uses can co-exist with residential uses. The proposed development complies with the aims and objectives of each plan mentioned above and also will provide much needed housing stock within the borough with a high level of affordable housing.

Consultation response from London Borough of Lewisham

35. Due to the eastern edge of the subject site abutting the borough boundary line with Lewisham, the authority was consulted on the application. Lewisham expressed concern and lodged a formal objection to the development. The table below summarises the nature of the objection from Lewisham.

Table: London Borough of Lewisham comments on the development

Objection	Officer Response
<p><u>Vehicular access for servicing from Surrey Canal Road:</u> The proposed new vehicular access to Surrey Canal Road has the potential to have a detrimental impact on the operation of these additional bus services along Surrey Canal Road, with associated implications for timetabling and frequency of service. Its proximity to the junction with Ilderton Road is likely to result in frequent obstruction of traffic movement on Surrey Canal Road and have associated implications for the effective operation of the Surrey Canal Road / Ilderton Road.</p>	<p>A Stage 1 Safety Audit was submitted along with the application that recommends that the service area from Surrey Canal Road is accessed as a left turn in and left turn out servicing arrangement with banned right turns. As part of the recommendations of the Safety audit, the Ilderton Road/Surrey Canal Road junction will be upgraded to a Toucan intersection that will improve the functioning of the intersection. In addition, the developer must promote the relevant traffic order to impose a left turn in / left turn out movement and banned right turns.</p>
<p><u>Impacts on Surrey Canal Road/Ilderton Road junction:</u> In the context of the pedestrian and cycle improvement works that will be required to the Surrey Canal Road / Ilderton Road junction to safely accommodate bus turning movements, it is not clear that this has been taken into account in the design of the proposed development. We would expect that a proportionate financial contribution should be secured from any development on this site towards improvements to the Surrey Canal Road / Ilderton Road junction.</p>	<p>As stated above, the Surrey Canal Road/Ilderton Road will be upgraded to a Toucan intersection in light of the recommendations informed from the submitted Road Safety Audit. The improvements to this intersection will have capacity to adequately accommodate cycle and pedestrian improvements. The development has been setback from both Ilderton Road and Surrey Canal Road to enable a more comfortable pedestrian and cycle experience when moving past the site. It is also acknowledged that the upgraded intersection will assist in Transport for London's ambitions to potentially increase bus services along Surrey Canal Road.</p>

KEY ISSUES FOR CONSIDERATION

Summary of main issues

36. The main issues to be considered in respect of this application are:
- Equalities Impact Assessment
 - Principle of the proposed development in terms of land use;
 - Opportunity Area;
 - Industrial land;
 - Affordable workspace;
 - Old Kent Road Phasing;
 - Provision of housing;
 - Affordable housing;
 - Development viability;
 - Design issues including site layout, tall buildings and heritage considerations;
 - Landscaping, trees, biodiversity, and urban greening;
 - Design Review Panel;
 - Housing mix;
 - Density;
 - Quality of residential accommodation;
 - Designing out crime;
 - Private, communal amenity space, children's playspace & public open space;
 - Impact of proposed development on amenity of adjoining neighbours and surrounding area;
 - Transport;
 - Archaeology;
 - Refuse and waste;
 - Wind and microclimate;
 - Fire strategy;
 - Flood risk and water resources;
 - Ground contamination;
 - Air quality and noise;
 - Energy, sustainability and digital connectivity;
 - Whole Life-Cycle and Circular Economy;
 - Health Impact Assessment;
 - Planning obligations; and
 - Mayoral and borough community infrastructure levy

Legal context

37. 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 Southwark Plan 2022 and the draft Old Kent Road Area Action Plan 2020.

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

EQUALITIES

39. The Equality Act (2010) provides protection from discrimination for the following protected characteristics: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership. Section 149 of the Equality Act 2010 places the Local Planning Authority under a legal duty to have due regard to the advancement of equality in the exercise of its powers, including planning powers. Officers have taken this into account in the assessment of this application and Members must be mindful of this duty, inter alia, when determining all planning applications. In particular Members must pay due regard to the need to:
- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act; and
 - Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
 - Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
40. As set out in the Essential Guide to the Public Sector Equality Duty (2014), “the duty is on the decision maker personally in terms of what he or she knew and took into account. A decision maker cannot be assumed to know what was in the minds of his or her officials giving advice on the decision”. A public authority must have sufficient evidence in which to base consideration of the impact of a decision.
41. The Strategic Housing Market Assessment (SHMA) prepared on behalf of a number of South East London boroughs states that Southwark, together with Lewisham, has the most ethnically mixed population in the South East London sub-region. Compared to the population at large a very high proportion of Black households (70%) are housed in the social/affordable rented sector. These groups could therefore stand to benefit from the proposed affordable housing, which would include social rented units. The provision of communal amenity spaces to be shared by different tenures would also contribute to the potential for increased social cohesion. This is a positive aspect of the scheme.
42. There are a large number of existing black and ethnic minority businesses in the local area, which would not be directly affected by the proposed development. However, the impact of the development would increase footfall in the local area and could create a number of opportunities for these existing businesses.

Other equality impacts

43. Travellers are a group with protected characteristics. The closest Travellers site to the proposed development is located close to the junction with Rotherhithe New Road and Ilderton Road. The distance between the Travellers site and the subject site is circa

390 metres to north. Given the sufficient separation distance it is therefore considered that no adverse impacts would occur to this group.

44. The proposed development would also generate additional opportunities for local employment. The proposed development would deliver increase the amount of commercial floorspace from 657.7sqm to 987.9sqm. The new floorspace will provide more efficient layout for Jewson to operate in and is considered to be a significantly positive aspect of the development proposal.

Conclusion on equality impacts

45. The proposed development would not result in any adverse equality impacts in relation to the protected characteristics of religion or belief and race as a result of the proposed development incorporating a mixed use scheme of residential units in C3 Use Class above ground and ground floor/mezzanine level commercial units. Notwithstanding that the development would result in a significant change to the site, Officers are satisfied that equality implications have been carefully considered throughout the planning process and that Members have sufficient information available to them to have due regard to the equality impacts of the proposal as required by Section 149 of the Equality Act 2010 in determining whether planning permission should be granted.

Environmental impact assessment

46. A Screening Opinion was submitted under Southwark planning reference 21/AP/1146 to determine whether an Environmental Impact Assessment (EIA) would be required for this development. The Screen Opinion demonstrated that an EIA for this proposal would not be required.

PRINCIPLE OF DEVELOPMENT IN TERMS OF LAND USE

Opportunity area

47. The site is located within the Old Kent Road Opportunity Area (close to the Central Activities Zone) where the London Plan recognises the potential for “significant residential and employment growth” to be realised through a suitable planning framework that optimises development in conjunction with improvements to public transport accessibility
48. The Old Kent Road Area Vision of the Southwark Plan 2022 sets out the overall vision for the Old Kent Road. The policy says development should:
 - Deliver direct benefits to the existing community including new and improved homes including new council homes, schools, parks, leisure and health centres, and the creation of jobs;
 - Promote car free development and support the Bakerloo Line extension, electric buses, taxis, commercial vehicles and cycling which will help to tackle air and noise pollution;
 - Help foster a community in which old and young can flourish;

- Build new homes that come in a range of types from terraced houses to apartments with a high design quality including generous room sizes, high ceilings and big windows to ensure people have space to think and to rest;
 - Link existing open spaces like Burgess Park to each other and new park spaces;
 - Demonstrate excellent standards of environmental sustainability including pioneering new district heating networks to reduce carbon emissions, measures to tackle poor air quality and sustainable urban drainage systems to reduce flood risk.
49. The Old Kent Road Area Vision also states that the Old Kent Road Area Action Plan (OKR AAP) will set out the physical framework that will enable the community to realise its potential. The council is in the process of preparing this Area Action Plan for Old Kent Road which proposes significant transformation of the Old Kent Road area over the next 20 years, including the extension of the Bakerloo Line with new stations along the Old Kent Road towards New Cross and Lewisham. A further preferred option of the Old Kent Road AAP (Regulation 18) was published in December 2020. As the document is still in draft form, it can only be attributed limited weight.

Industrial land

50. The application site is identified within the Southwark Plan 2022 (Policy P29) as a Locally Significant Industrial Site (LSIS). The objective of this designation is for LSIS sites to be intensified for residential and industrial co-location. In addition, the site is also within the boundaries of Site Allocation NSP70 '*Hatcham Road and Penarth Street and Ilderton Road*' of the Southwark Plan 2022. NSP70 requires developments to:
- Provide new homes (C3); and
 - Provide at least the amount of employment floorspace currently on the site (E(g), B class); and
 - Provide industrial uses (E(g)(iii) or B8 use class); and
 - Provide public open space - 1,990m²
51. The redevelopment of the site would accommodate 170 residential units, an increase on the existing provision of employment floorspace on site, retain the existing occupier on site, and provides 245sqm of public open space. The provision of open space would contribute towards the overall goal of 1,990sqm of public open space for the NSP70 allocation.
52. Policies E4 and E7 of the London Plan support the intensification and improvement of industrial uses on existing employment sites in order to ensure a sufficient supply of industrial capacity across London. Whilst not an "industrial" use per se, the proposed builders' merchants is a re-provision of an existing use on-site that supports other industrial activities.
53. The Old Kent Road was designated as an Opportunity Area through the previous iteration of the London Plan, with an indicative capacity of 1,000 new jobs and a minimum of 2,500 new homes. However, this has been increased to an indicative

capacity of 12,000 homes in the New London Plan (2021). The London Plan notes that the emerging OKR AAP should “*set out how industrial land can be intensified and provide space for businesses that need to relocate from any SIL identified for release. Areas that are released from SIL should seek to co-locate housing with industrial uses, or a wider range of commercial uses*”.

54. Furthermore, the draft OKR AAP sets targets of 20,000 new homes and 10,000 new jobs, to be supported by new infrastructure, including parks and schools. It proposes the release of a substantial part of the Strategic and local Preferred Industrial Location designation to allow for the creation of mixed use neighbourhoods where new and existing businesses would co-exist with new homes.
55. Paragraph 141(a) of the NPPF promotes making effective use of underutilised land, especially where this would help meet an identified need for housing. This has been incorporated into adopted policy as set out in Policy GG2 of the London Plan which seeks to prioritise the development of Opportunity Areas and sites which are well-connected by existing or planned Tube and rail stations and small sites. The application site is located within the Old Kent Road Opportunity Area. In locations such as this, both London Plan and Southwark Plan policies strive for higher density, high quality mixed use developments which assist in addressing the need for new homes and ranges of employment opportunities.
56. In the draft OKR AAP, the site is identified as falling within Sub Area 4 and Proposal Site OKR16. The AAP reiterates the purpose for LSIS sites to incorporate new homes typologies into developments to co-exist along with industrial uses on site. This is illustrated in the typologies map on the following page of this report.
57. The existing use on site is not considered to maximise the potential of this Opportunity Area Proposal Site. The proposed re-development of the site would introduce a mixed use building comprising of the retention of the Jewson Builders’ Merchants on site on the ground and mezzanine floor levels, and C3 residential Use Class to the upper floors. It is anticipated that the scheme would deliver major regeneration benefits that are further discussed in the proceeding parts of this report.

Image: Sub Area 4 - OKR16 with subject site outlined in red



Image: Typologies map of OKR16 – Subject site outlined in red



Employment and affordable workspace

Employment re-provision

58. Compared to the existing facility, a larger double-height covered yard is proposed (including a mezzanine office/sales area) with a smaller external yard to make more efficient use of the site. Overall, the proposed development provides an uplift in employment floorspace and re-provides Jewson with a modern facility that is fit for purpose. A small commercial unit is also provided fronting Ilderton Road (Use Class

E) that would be occupied by Jewson as a sales room. The proposals would result in an increase on the 9 existing full time employed (FTE) jobs with a predicted 15 FTE jobs. The council's Local Economy Team (LET) have reviewed the scheme and support the proposal. Triggers for employment obligations have been recommended by LET and are to be secured in the S106 Agreement.

Image: Lower ground floor layout

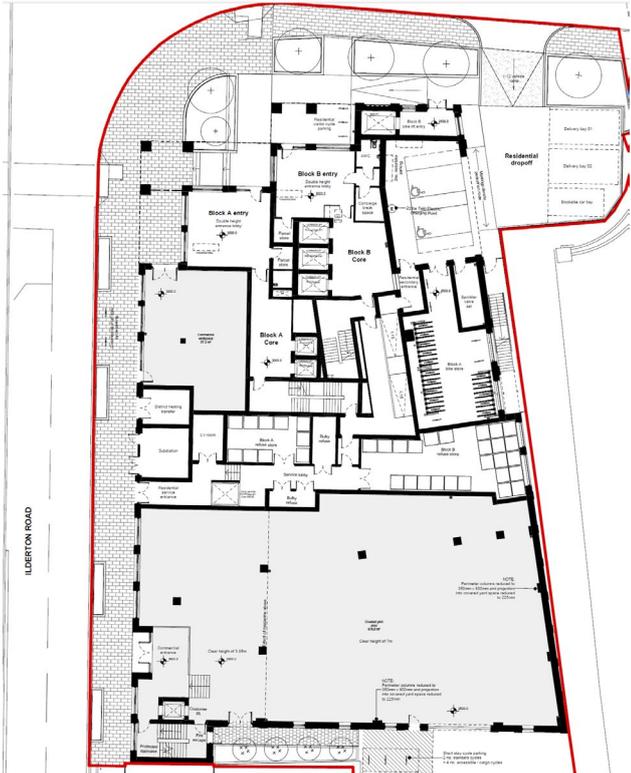
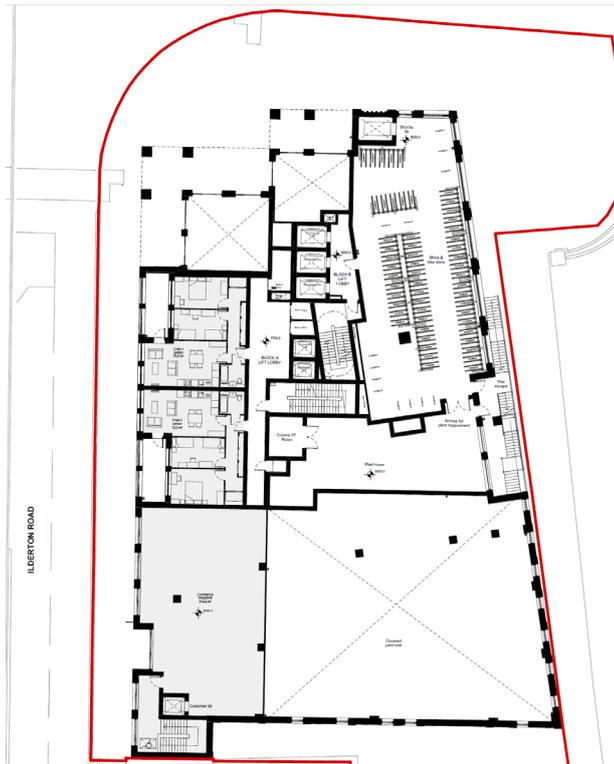


Image: Upper ground floor layout



Affordable workspace

59. Policy P31 of the Southwark Plan requires developments proposing 500sqm GIA or more employment floorspace to provide 10% of the proposed gross employment floorspace as affordable workspace on site at discount market rents. In this instance; however, the replacement builders' merchants space has been specifically designed by Jewson to meet their own unique and changing operational requirements, and no affordable workspace is proposed on site. Jewson has a strong presence within Southwark and employs many people, and it is therefore considered in this instance, that there is no in-principle objection to no affordable workspace being provided as part of this redevelopment.
60. It is acknowledged that there is a 97.3sqm commercial unit on the ground floor, and it is the intention of Jewson to use this unit for their operational needs. In addition, the commercial floorspace has been designed to be flexible enough to accommodate a variety of industrial occupiers in the future should that be required in the event Jewson vacate the site. Given this potential, a mechanism is to be included in the S106 Agreement that should Jewson not occupy the redevelopment, or if Jewson vacate the premises in the future, that the 97.3sqm unit is occupied by an affordable workspace business. This would amount to 10.92% of the floorspace within the development.

Provision of housing, including affordable housing

61. The development would provide 61 affordable units that comprises of 35 social rented units, and 26 intermediate homes. This equates to a total of 40.3% affordable housing by habitable rooms. The provision of affordable housing proposed within the scheme is a significantly positive aspect of the scheme. Additionally, the proposed social rent homes would be provided at social rent levels.

Old Kent Road Phasing

62. The Greater London Authority (GLA) and Transport for London (TfL) officers have worked closely with Southwark Council officers to agree the broad geography and phasing of development in the area covered by the OKR AAP, to help provide certainty to communities, local businesses and developers in advance of the Bakerloo Line Extension (BLE) and a clear timetable for its delivery. This has resulted in broad agreement between the GLA, TfL and Southwark Council on the scale and geography of the area's new town centres, where industrial uses will be retained, replaced and intensified, and how housing delivery will be phased in advance of the BLE. Broad alignment and the location of potential tube stations has also been agreed between Southwark Council and TfL and formal safeguarding is in place (which is further discussed later in the below paragraphs).
63. As part of this process, a cap of 9,500 net additional homes has been agreed for Phase 1 until a BLE construction contract is in place. In this case, recognition has been given to the severity of the need to provide housing stock along with retaining a good quality employer within Southwark on an improved and functional floorspace to support Jewson in continuing their operations. As such, officers have worked to incorporate the redevelopment of the subject site into the 9,500 cap.

Prematurity

64. Legal Advice received in relation to this issue highlights the following from the National Planning Policy Guidance:

“arguments that an application is premature are unlikely to justify a refusal of planning permission other than where it is clear that the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, taking the policies in the Framework and any other material considerations into account. Such circumstances are likely, but not exclusively, to be limited to situations where both:

- a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging Local Plan or neighbourhood planning; and
 - b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.
65. Refusal of planning permission on grounds of prematurity would seldom be justified

where a draft Local Plan has yet to be submitted for examination, or in the case of a Neighbourhood Plan, before the end of the local planning authority publicity period. Where planning permission is refused on grounds of prematurity, the local planning authority will need to indicate clearly how the grant of permission for the development concerned would prejudice the outcome of the plan-making process.”

66. The most up to date adopted development plan documents pertinent to the Old Kent Road are the 2021 London Plan and the Southwark Plan 2022. These identify the Old Kent Road Opportunity Area as having significant potential for housing led growth. The draft OKR AAP has been developed in response to the adopted London Plan (and its previous iteration London Plan 2016) and has also sought to address the increased housing target for the opportunity area and the need to ensure that the London Plan aspirations for employment and residential are addressed. The scheme under consideration here is not considered to undermine either the strategic or local plan making process, and reflects the adopted statutory development plan position of the 2021 London Plan, the Southwark Plan 2022, and the 2017 and 2020 draft OKR AAPs. It is not therefore considered to be premature.

Conclusion on land use

67. The scheme would deliver major regeneration benefits, including a significant contribution to the borough’s housing stock, 40.3% affordable housing, the re-provision of the Jewson Builders’ Merchants, and a significant improvement to the existing commercial space. It is therefore considered that the development, in land use terms, is acceptable, and its contribution to the surrounding Old Kent Road Opportunity Area (OKROA) should be supported.

AFFORDABLE HOUSING AND DEVELOPMENT VIABILITY

Affordable housing

68. National, regional and local planning policies place a high priority on the delivery of affordable housing as part of the plan led approach to addressing the housing crisis. Southwark’s Strategic Housing Market Assessment (SHMA) identifies a need for 2,077 social rented and intermediate homes per annum which is approximately 71% of Southwark’s total housing need. The SHMA suggests that approximately 78% of the total affordable housing need is for intermediate housing to meet the housing needs of lower and middle income residents. However, the most acute need is for social rented housing to meet the needs of homeless households living in unsuitable temporary accommodation such as bed and breakfasts or overcrowded conditions.
69. The regional policies relating to affordable housing are set out in the London Plan 2021, with the three key policies being H4, H5 and H6. These should be applied having regard to the Mayor’s ‘Housing’ and ‘Affordable Housing and Viability’ SPGs. Policy H4 requires development to deliver the maximum reasonable amount of affordable housing, with the Mayor setting a strategic target of 50%. Policy H6 also prescribes the tenure split of affordable housing. It requires:

- at least 30% to be low-cost rent (social rent or London Affordable Rent);
- at least 30% to be intermediate (with London Living Rent and shared ownership being the default tenures); and
- the remaining 40% to be determined by the borough as low-cost rented homes or intermediate tenure(s) based on identified local need.

70. The Southwark Plan Policy P1 sets a requirement for a minimum of 25% of all the housing to be provided as social rented and a minimum of 10% intermediate housing to be provided. In accordance with Policy P1, rooms that are over 28sqm have been counted as two habitable for the purposes of calculating affordable housing. This accounts for large open plan living room spaces that include kitchens and dining areas.

Table: Affordable housing mix

	Block A		Block B				TOTAL		
	Social Rent		Intermediate		Private		Units	HR	%
	Units	HR	Units	HR	Units	HR			
1 Bed	5	10	8	16	40	80	53	106	31.2%
2 Bed	16	48	12	36	54	162	82	246	48.2%
3 Bed	0	0	6	24	15	60	21	84	12.4%
4 Bed	14	70	0	0	0	0	14	70	8.2%
	35	128	26	76	109	302	170	506	100%

71. In total, 506 habitable rooms would be provided in the proposed development. Of this amount, 128 habitable rooms equating to 35 units forms the social rent aspect of the development, 76 habitable rooms makes up the 26 units in the intermediate tenure, and 302 habitable rooms that amounts to 109 private units. In total 40.3% affordable housing is proposed with 25.3% proposed for social rent, and 15% proposed for the intermediate tenure based on habitable rooms. This exceeds the requirement for 25% of homes to be social rented complying with Policy P1.
72. With regards to access to grant funding, the applicant (Twenty Twenty Ilderton Wharf Limited and SGBD Property Holdings Limited) has not applied for grant funding from the GLA for the additional affordable housing. However, they are seeking to partner with a Registered Provider (RP) post consent to deliver the affordable housing, and the RP may want to access grant funding at that point. It is therefore considered that the need to maintain the ability for an RP to access potential grant funding is allowed post consent.

Development viability

73. Policy P1 states that where development that provides 40% affordable housing, with a policy compliant tenure mix, (e.g. a minimum of 25% social rented and a minimum of 10% intermediate housing) as set out in table 1 with no grant subsidy can follow the fast-track route. Where developments follow the fast track route they will not be subject to a viability appraisal. The fast-track route for affordable housing provision has also been agreed with the GLA during pre-application discussions. A viability appraisal will

be necessary if amendments are proposed to lower the affordable housing provision to less than 40% following the grant of planning permission.

74. As the development provides 40.3% affordable housing based on habitable rooms, totalling 61 units, the development is therefore eligible for the fast track route. Given the above, the application is compliant with policy and therefore does not require a viability assessment to be submitted with the application.

Conclusion on affordable housing

75. In conclusion, this development does not currently benefit from public subsidy (although grant funding may be applied for in the future by a Registered Provider once appointed), and provides a combined affordable housing offer of 40.3% that exceeds Policy P1 fast track requirements. The delivery of social rent, and intermediate units is a very positive aspect of the proposals. In line with section E of London Plan Policy H5, to ensure the applicant fully intends to build out the permissions, the requirement for an Early Stage Viability Review will be triggered if an agreed level of progress on implementation is not made within two and a half years of the permission being granted. This will be secured through the S106 Agreement.

DESIGN CONSIDERATIONS

76. The NPPF requires that good design is a key aspect of sustainable development and is indivisible from good planning (paragraph 124). Chapter 3 of the London Plan seeks to ensure that new developments optimise site capacity whilst delivering the highest standard of design in the interest of good place making. New developments must enhance the existing context and character of the area, providing high quality public realm that is inclusive for all with high quality architecture and landscaping. The importance of good design is further reinforced in the Southwark Plan Policies P13 and P14 which require all new buildings to be of appropriate height, scale and mass, respond to and enhance local distinctiveness and architectural character; and to conserve and enhance the significance of the local historic environment. Any new development must take account of and improve existing patterns of development and movement, permeability and street widths; and ensure that buildings, public spaces and routes are positioned according to their function, importance and use. There is a strong emphasis upon improving opportunities for sustainable modes of travel by enhancing connections, routes and green infrastructure. Furthermore, all new development must be attractive, safe and fully accessible and inclusive for all.

Site layout

77. London Plan Policy D3 requires developments to make the most efficient use of land to optimise density, using an assessment of site context and a design-led approach to determine site capacity. This design led approach is also reflected in Southwark Plan Policy P18. In respect of site layout and public realm Southwark Plan Policy P13 requires developments to ensure that the urban grain and site layout take account of and improve existing patterns of development and movement, permeability and street widths; to ensure that buildings, public spaces, open spaces and routes are positioned

according to their function, importance and use to ensure that a high quality public realm that encourages walking and cycling is safe, legible, and attractive is secured. *The detailed design of all areas of public realm must be accessible and inclusive for all ages and people with disabilities as well as providing opportunities for formal and informal play and adequate outdoor seating for residents and visitors.*

78. The proposed layout of the site would comprise of one urban block to the north of the site with a 2 storey commercial podium, 9 storey shoulder fronting Ilderton Road and a tower block at the north-eastern edge of the site adjacent to the railway viaduct. The block typology aligns with the rectilinear nature of the site. The proposed tower block is articulated into two separate massing's reaching 25 storeys at the north and stepping down to 23 storeys to the south. This articulation reduces the bulk of overall perceived massing. The 9 storey shoulder block provides a transition in scale to the frontage along Ilderton Road and will be in line with the shoulder height of emerging neighbouring development along Ilderton Road.
79. The proposed layout improves the relationship with surrounding streets providing increased active frontages. Residential entrances are setback from the north-western corner of the site onto Ilderton Road and Surrey Canal Road. Significant increases to the width of the pathway at this junction improves the public realm and pedestrian permeability, located in close proximity to pedestrian crossings and residential entrances. Improvements to the streetscape include the widening of the pavement along Ilderton Road to 3.8m with the integration of planting as a buffer between the highway and pedestrians. This also enhances the public realm as well as commercial and residential entrances areas including double height entrance lobby spaces.
80. The proposed typology re-locates the Jewson warehouse and shop into the podium of the development with continued use of the working yard. Separate access routes are proposed to manage the reconciliation of uses, with a proposed residential access and servicing situated to the north from Surrey Canal Road, and retention of the yard access to Jewson's from Rollins Street to the south of the site. The constraints of the site do not allow for a shared access between residential and industrial uses, due to safety concerns with pedestrians and a constrained site and the need to keep the Jewson operation separate from the residential. To the rear of the site is the residential loading bay which will be accessed in a controlled manner from Surrey Canal Road.

Height Scale and Massing (including consideration of Tall Buildings)

Image: The development, viewed from Ilderton Road looking southbound



81. London Plan Policy D9 provides policy requirements for tall buildings. The policy sets out a list of criteria against which to assess the impact of a proposed tall building (location/visual/functional/environment/cumulative). London Plan Policy D4 requires that all proposals exceeding 30 metres in height and 350 units per hectare must have undergone at least one design review or demonstrate that they have undergone a local borough process of design scrutiny.
82. Southwark Plan Policy P17 deals with tall buildings. The policy identifies this site as suitable for tall buildings as it is located within the Old Kent Road opportunity core area. The policy sets out a list of requirements for tall buildings of which the policy states that tall buildings must:
 1. Be located at a point of landmark significance; and
 2. Have a height that is proportionate to the significance of the proposed location and the size of the site; and
 3. Make a positive contribution to the London skyline and landscape, taking into account the cumulative effect of existing tall buildings and emerging proposals for tall buildings; and
 4. Not cause a harmful impact on strategic views, as set out in the London View Management Framework, or to our Borough views; and
 5. Respond positively to local character and townscape; and
 6. Provide a functional public space that is appropriate to the height and size of the proposed building; and
 7. Provide a new publicly accessible space at or near to the top of the building and communal facilities for users and residents where appropriate.

83. Policy 8 of the Draft OKR AAP sets out a tall building strategy with the ‘Stations and Crossings’ reinforcing the proposed hierarchy of buildings. The three tier strategy defines a clear building height strategy across the opportunity area. ‘Tier One’ buildings represent developments that exceed 20 storey’s in height. These developments are proposed to be sited in the vicinity of the proposed BLE stations, to mark their city wide significance and optimise the use of land in the most accessible locations. Mid height ‘Tier Two’ buildings proposes building heights within the range of 16 to 20 storeys to mark places of local importance to help define their character and assist wayfinding. ‘Tier Three’ tall buildings up to 15 storey’s will act as markers within the neighbourhood. The strategic locations of Tier One and Tier Three buildings assist in wayfinding and markers at a junction.
84. The policy states that the design of buildings should carefully consider their impact on the skyline and their relationships with the surrounding context, be of exemplary design and provide high residential quality where new homes are provided. The site is identified within the OKR AAP as having scope to provide a taller Tier 2 building given its location at the important junction between Ilderton Road and Surrey Canal Road. In the 2017 draft AAP tier 2 buildings were defined as being up to 25 storeys and it was on that basis that pre application discussions began in 2019. Given that context and the public benefits of the scheme it is therefore considered that the tallest part of the building is line with ambitions for the site contained within the OKR AAP.

Image: The ‘Stations and Crossings Strategy in the draft OKR AAP



85. This mixed use development forms a single urban block composed of a variety of strata; a two-storey industrial podium that stretches across the majority of the urban plot with a nine-storey shoulder block and a 23/25 storey tower block located at the north eastern edge of the site forming the upper residential uses. The proposed shoulder block is considered to provide an appropriately scaled frontage onto Ilderton Road, responding to the surrounding context. A vertical tower is located to the north eastern edge of the site by the railway track reaching 25 storeys at its highest point

and 23 storeys at its lowest. The massing of the tower is reduced through articulation of the urban form, mimicking an H shaped block, with central intrusions. A step down in height to the south of the site has a slight reduction in the overall scale as perceived from the courtyard space. This articulation of the East and West elevations contributes to reducing the perceived bulk from these views. While the massing and height of the proposal contrasts with the low-rise buildings adjacent to the site, it does not conflict with the prevailing pattern of development within the wider planned context. The proposal is considered to be in line with the tall building strategy outlined in the AAP and Policy P17 in the Southwark Plan.

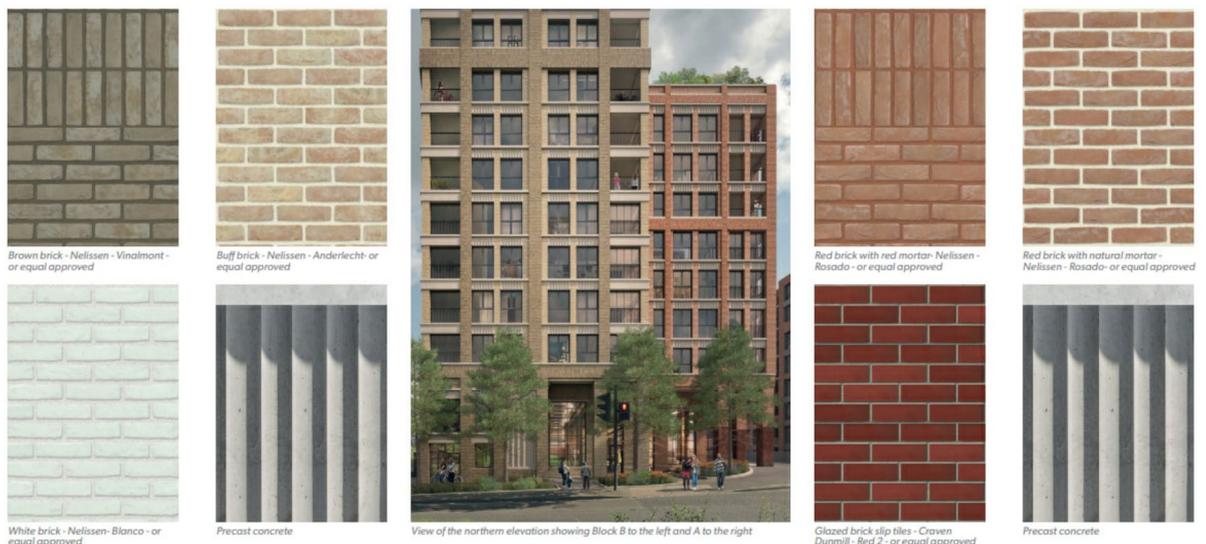
86. The proposal provides a sophisticated transition in scales to form a frontage along Ilderton Road and provides articulation to the massing of the development. Building frontages have been generously set back from the edge of the urban plot to create an increased public realm with the provision of landscaping and planters along the pathway. At the north-western corner residential entrances have been recessed to provide an improved public realm, and provides positive inviting entrances for residents, with a 2 storey lobby entrance. The proposed podium has been designed to give a strong street presence along Ilderton Road, increasing active frontages and providing entrances to both residential and commercial uses, from the primary road.
87. The design of the urban block takes into account the base, middle and top principles, providing articulation across the facades and block. Providing interest for immediate, mid-range and longer views as identified in the London Plan 2021. The railway line provides a physical barrier between the boroughs of Southwark and Lewisham. The tower will improve urban legibility, positioned along the eastern edge of the railway viaduct at the junction of borough boundary. The composition of the tower is expressed in a bricked verticality, with a clear grid order which is resumed on the shoulder block. Deep reveals and recessed balcony corners accentuate architectural interest. The scale and robust quality of the brick columns relate to the industrial character of the area and the adjacent railway arches.
88. The two storey base was established along Ilderton Road to allow for a distinct language of the commercial element, and to improve the relationship of the proposed development with adjacent terraces. Large cut-out setback adds to the public realm and wraps around the north western corner of the building. Whilst providing visual emphasise of residential entrances, establishing a street presence along Ilderton Road. The urban block has been setback to provide sufficient streetscape, pavement space and appropriate landscaping for the development. Improvements have been made at the 'knuckle' of the site to provide increased public realm, reaching around 7m at residential entrances, providing a positive grounding to the development. Ground floor glazing provides visual connection to the internal builders yard functions creating mproved pedestrian access and active frontages to the existing Jewson's uses along Ilderton Road.
89. In line with the draft OKR AAP, the design of the tall buildings would be exemplary, with careful consideration of their impact on the skyline. For the reasons set out above it is considered that the proposal accords with Policy P17 in terms of the principal requirements for tall buildings as well as Policy 8 of the Old Kent Road Area Action Plan. Additionally, this application was accompanied by a Heritage, Townscape and

Visual Impact Assessment. The impact on protected views and heritage assets is discussed in the relevant section of this report.

Architectural design and materiality

90. Southwark Plan Policy P14 sets out the criteria for securing high quality design. In respect of architectural design and materials the policy requires all developments to demonstrate high standards of design including building fabric, function and composition; presenting design solutions that are specific to the site's historic context, topography and constraints; responding positively to the context using durable, quality materials which are constructed and designed sustainably to adapt to the impacts of climate change.
91. The use of different materials on each block provides architectural interest and further defines the articulation of the massing whilst providing separation between the uses. The proposal will be viewed as a cluster of buildings rather than an overwhelming mass of development. Further articulation was provided to the Tower following earlier advice and it is now considered that a positive design outcome has been reached. The difference between the two taller elements provides visual interest and articulation between the forms.
92. The glazed red tile finish of the shoulder block provides an appropriate finish that fronts the public realm, whilst also demarcating the commercial areas of the development. The architectural language of the development provides a strong robust appearance that reflects the emerging and existing character of the area.
93. The high quality architecture is considered to enhance the existing appearance of the subject site whilst referencing the surrounding context. Submitted details ensure that there would be depth and articulation to facades of the development. This level of detail will be secured through the inclusion of conditions in order to ensure that this level of design quality is maintained in the construction of the proposal. These conditions have been attached to the decision notice.

Image: Materiality palette



Landscaping

94. Policy P59 of the Southwark Plan (Green infrastructure) states that major developments that are referable to the Mayor of London must provide new publically accessible open space and green links. Additionally, developments should provide multiple benefits for the health of people and wildlife, and to integrate with the wider green infrastructure network and townscape / landscape, increasing access for people and habitat connectivity. Point 3 of London Plan Policy G1 (Green Infrastructure) requires Development Plans and Opportunity Area Planning Frameworks should identify key green infrastructure assets, their function and their potential function. They should also identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.
95. An indicative landscaping strategy is proposed for the site which outlines a high-quality approach towards hard and soft landscaping throughout. Extensive and appropriate planting and landscaping in the communal amenity areas and on the site boundaries has been incorporated into the design to indirectly connect and enhance the Senegal Railway Banks SINC on the eastern boundary of the site.

Image: Landscape proposals podium level

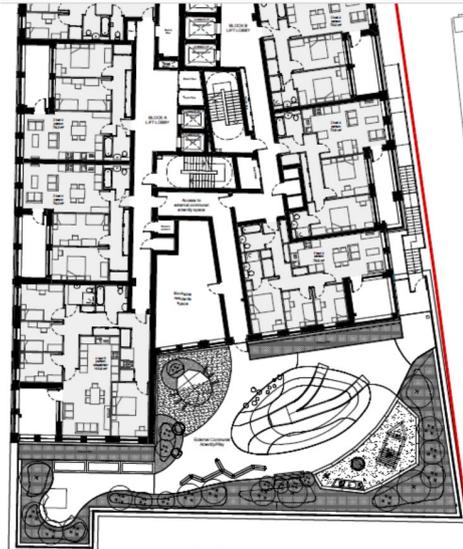
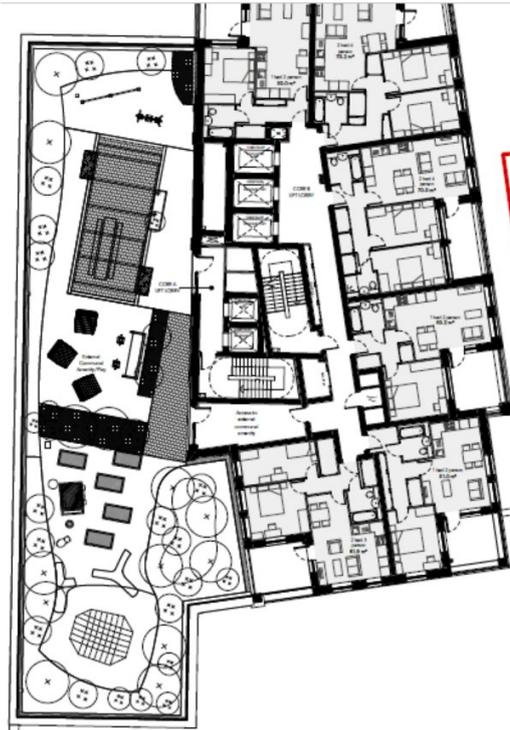


Image: Landscape proposals 8th floor



96. Overall, the landscape proposals are considered to be a significantly positive aspect of the redevelopment of the subject site. All plans are indicative with detailed landscape plans involving hard and soft features being subject to conditions which are attached to the decision notice. The hard and soft landscaping condition will require appropriate buffering to units fronting onto the communal amenity spaces proposed within the development.
97. With regards to the proposed Green Wall within the amenity space, the submitted fire safety statement addresses aspects of external fire spread by stating that external walls will be class A2-s1, d0 or better. In addition, the climbers are growing on the pergola on the 8th floor roof garden and not on the building facade which is effectively integrated into the wider landscape proposals. The statement demonstrates that the external walls should be either of limited combustibility or non-combustible and no objections are raised to the incorporation of the Green Wall into the proposals. A condition will require details of the green wall planting to be submitted including confirmation that it is of a non-combustible nature.
98. The security of future residents has also been considered, with lighting arranged around the external amenity areas. The lighting is of a low level and has been strategically placed so that there are no hidden corners within the amenity spaces. A lighting strategy is secured by condition and attached to the decision notice.

Ecology

99. An Ecological Appraisal (PEA) has been prepared by Tyler Grange dated December 2021. The EA has identified habitats that are present on site are of negligible ecological value and require no specific mitigation for their removal. The nearest

designated site is the Senegal Railway Banks SINC, which abuts the eastern boundary of the subject site. Shading from the tower is anticipated to affect the northern most tip of the SINC only, and only for small proportion of the day (from mid-late afternoon onwards). It is considered that the proposals do not present any negative direct impacts on the statutory designated site, as the site is already subject to high levels of disturbance and as its flora is dominated by shade tolerant and intermediate shade tolerant species.

100. As part of the Construction Environmental Management Plan (CEMP) that will need to be produced prior to construction taking place, the CEMP should be produced to manage construction activities and prevent any adverse effect on the SINC.
101. During consultation with the council's Ecologist, bird and bat boxes have now been positioned higher on the building and are positioned between 3m and 6m above ground under the parapet, but above the windows. Overall, the ecological proposals for the site raises no objection from Southwark's Ecologist. Recommended conditions have been attached to this decision to ensure compliance.

Urban greening factor

102. Policy G5 of the London Plan 2021 encourages major developments to contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. The policy also recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for commercial sites.

Image: Urban Greening Factor score

Urban Greening Factor Calculator				
Surface Cover Type	Factor	Area (m ²)	Contribution	Notes
Semi-natural vegetation (e.g. trees, woodland, species-rich grassland) maintained or established on site.	1	0	0	
Wetland or open water (semi-natural; not chlorinated) maintained or established on site.	1	0	0	
Intensive green roof or vegetation over structure. Substrate minimum settled depth of 150mm.	0.8	491.38	393.104	
Standard trees planted in connected tree pits with a minimum soil volume equivalent to at least two thirds of the projected canopy area of the mature tree.	0.8	287.54	230.032	
Extensive green roof with substrate of minimum settled depth of 80mm (or 60mm beneath vegetation blanket) – meets the requirements of GRO Code 2014.	0.7	343.73	240.611	
Flower-rich perennial planting.	0.7	35.33	24.731	
Rain gardens and other vegetated sustainable drainage elements.	0.7	109.53	76.671	
Hedges (line of mature shrubs one or two shrubs wide).	0.6	0	0	
Standard trees planted in pits with soil volumes less than two thirds of the projected canopy area of the mature tree.	0.6	0	0	
Green wall –modular system or climbers rooted in soil.	0.6	29.53	17.718	70% coverage of pergola
Groundcover planting.	0.5	0	0	
Amenity grassland (species-poor, regularly mown lawn).	0.4	0	0	
Extensive green roof of sedum mat or other lightweight systems that do not meet GRO Code 2014.	0.3	0	0	
Water features (chlorinated) or unplanted detention basins.	0.2	0	0	
Permeable paving.	0.1	935.17	93.517	
Sealed surfaces (e.g. concrete, asphalt, waterproofing, stone).	0	0	0	
Total contribution			1076.384	
Total site area (m²)				2513.71
Urban Greening Factor				0.428205322

103. Given the operational requirements for a builders merchants such as Jewson, the external yard area cannot be landscaped. The nature of the working builders merchant yard requires that sufficient space is provided for vehicular turning, torque, and working access. Therefore, in this instance, the substantial area of external yard space within

the site is essential to the operational requirements for Jewson and is not included in the UGF calculations for the development.

104. Given the above paragraph, the total site area within the development for UGF values is 2,512M², which is formed from the residential building area including public realm, communal amenity and biodiverse roofs. The UGF score would amount to 0.42, which is an increase on the guidance target within the London Plan.

Trees

105. London Plan Policies (G1 & G7) and Southwark Plan Policy P61 require that wherever possible, existing trees of value are retained.
106. There are four existing trees on the Surrey Canal Road frontage of the subject site. As part of the comprehensive redevelopment of the site, these existing trees are to be removed. The four trees fall under Category B and C and are required to be removed to enable the development. In their place, six trees are to be planted along the Surrey Canal Road frontage with the replacement trees considered to have greater physical and visual value.
107. Point 4 contained within P61 of Southwark Plan states that where trees are removed to facilitate development, they should be replaced by new trees which result in no net loss of amenity, taking into account canopy cover as measured by stem girth; either
1. Within the development whereby valuation may be calculated using the (CAVAT) methodology or other assessment; or
 2. If this is not possible, outside the development. In this case a financial contribution must be provided to improve borough tree planting located according to 'right tree right place' principles. The financial contribution will include ongoing maintenance costs where trees are planted in the public realm.
108. The scheme provides acceptable replacement trees at street level suitable to site and species. The trees which are to be removed are Category B and C trees and are of a size such that 5 x 20-25cm /25-30cm replacements would ensure a continuity of canopy cover and amenity. Together with the proposed podium planting there is no net loss in canopy cover as measured by stem girth and so the onsite mitigation strategy is fully compliant with Policy P61 of the Southwark Plan 2022.
109. At podium level, the species palette is welcomed. The applicant suggests a soil depth of 850cm, which is on the lower limits for tree establishment and a minimum of 3.5m available soil would be required for each of the trees. In total 21 trees are proposed and their establishment, replacement and care, along with other soft landscaping elements would need to be conditioned for the longevity of the building. These conditions are attached to the decision notice.

Design Review Panel

1st Design Review Panel - Spring 2021

110. The proposal was subject to the Design Review Panel (DRP) during spring of 2021. The response from the DRP was generally favourable, although some key issues were identified. These are discussed below.
111. The Panel raised concerns over the commercial workspace along Ilderton Road and its poor relationship with the street as it rises above the plant spaces. Additionally, the Panel thought that the residential drop-off area was insufficient, and that the commercial entrances lack distinction.
112. Officer comment: Following the comments received, the commercial space along Ilderton Road was lowered to pavement level along its length so provide a stronger connection with the street level that assists in activating the development along Ilderton Road. In light of the DRP comments, the residential drop-off area was expanded to increase capacity of delivery vehicles, and the entrance to the commercial unit from Ilderton Road was redesigned to give the unit a setback covered entrance.
113. The Panel thought that the scheme was too tall, and that the taller building has a lack of variety and articulation.
114. Officer comment: Following concerns of the height, the tower block was reduced down from 28 storeys to 25, with the shoulder block dropping from 14 storeys to nine storeys fronting onto Ilderton Road. This shoulder height reflects the heights of the developments adjacent at 60A and 62 Hatcham/134-140 Ilderton Road, and 180 Ilderton Road. Additionally, the scheme is now lower than the 28-storey tower approved as part of the Leathams redevelopment at 227-255 Ilderton Road immediately to the south of the subject site. Regarding the lack of variety and articulation the tower was refined and broken into two portions that break the buildings into smaller forms with their own distinctive character.

2nd Design Review Panel – Autumn 2021

115. The revised scheme was subject to a second round at the Design Review Panel scrutiny in Autumn 2021. The overall response was from the DRP was positive with articulation and character incorporated into the reduced massing of the development.
116. The Panel felt that whilst the reduced height of the tower provided a more appropriate massing, the tower does not finish with enough celebration. Additionally, the Panel thought that the 'knuckle corner' of Ilderton Road and Surrey Canal Road felt tight.
117. Officer comment: The scheme has a brick framing to the northern portion of the tower which was re-proportioned to give a greater emphasis to the top of the building. A secondary framing 'crown' was added to the southern portion of the Block B tower to create a distinctive top when viewed from the south. Regarding the corner knuckle, the area around the commercial and residential entrances was redesigned to provide additional pavement width and create a better public space between the two pedestrian crossings.
118. The Panel also raised a query over the commercial frontage not being differentiated from the residential entrances, and that the connections between the cycle and storage area with the lobbies was not clear.

119. Officer comment: To differentiate the commercial frontage from residential entrances within the scheme, the use of glazed brick slip tiles along the commercial frontage with rounded corners was introduced to highlight the commercial areas and create an engaging materiality along the pedestrian realm of Ilderton Road. For the relationship between the lobbies and the cycle and refuse storage, internal levels changes were reduced to create a simpler internal arrangement.

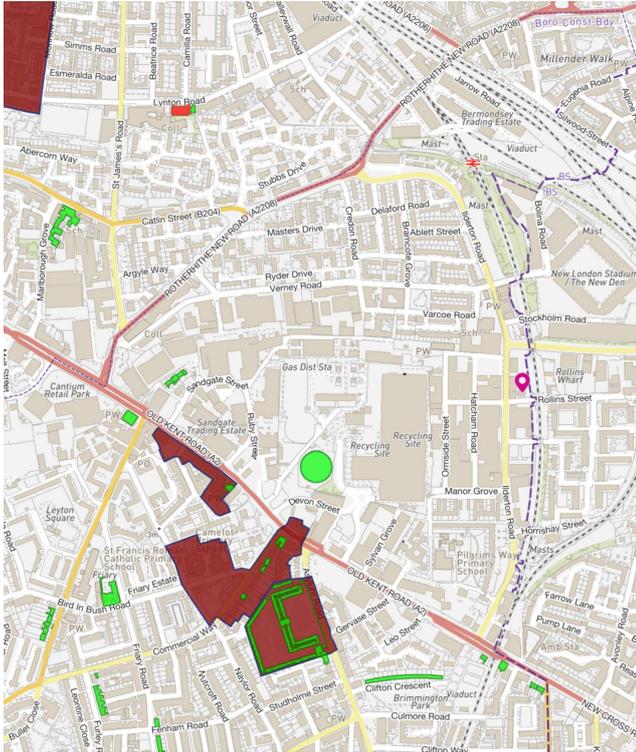
HERITAGE AND TOWNSCAPE CONSIDERATIONS

120. Policy HC1 of the London Plan 2021 advises that development affecting heritage assets and their settings should conserve their significance by being sympathetic in their form, scale, materials and architectural detail. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires local planning authorities to consider the impacts of proposals upon a conservation area and its setting and to pay “special regard to the desirability of preserving or enhancing the character or appearance of that area”. Section 66 of the Act also requires the Authority to consider the impacts of a development on a listed building or its setting and to have “special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses”. Para 199 of the NPPF 2021 states that ‘great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.’

Conservation areas

121. The subject site is not located within the boundaries of a conservation area, nor is it a listed building. The closest conservation area is Kentish Drovers and Bird in Bush, located approximately 550 metres southwest of the subject site. Designated heritage assets within 500 metres of the site is limited to Grade II listed Gasholder no. 13 which is located approximately 430 metres southwest of the subject site.

Image: Listed buildings (green) and conservation areas (brown) located nearby; subject site is purple pin



Draft OKR APP and draft Local List

122. Although of limited weight, the draft OKR AAP also identifies buildings and features of townscape merit and buildings of architectural or historic interest. These buildings are also included on the draft Local List published by the council in March 2018. The following are within or immediately adjacent to the application site:

Table: Draft AAP Building or Feature of Townscape Merit within the immediate vicinity of the site:

Property	Description
209-225 Ilderton Road	Building of Townscape Merit
Penarth Centre, 30 Penarth Street	Building of Townscape Merit
Christ the King Chapel, 8 Manor Grove	Building of Townscape Merit

Townscape and Visual Impact Assessment (TVIA)

123. BWB has submitted a Townscape and Visual Impact Assessment (TVIA) as part of this application. The study area for the TVIA is taken to be a 2km radius from the site and has been informed by the Zone of Theoretical Visibility (ZTV). The effects on settings of heritage assets or ecological/ environmental assets will not be assessed within this TVIA, although effects on built landmarks are considered if they contribute

to townscape character. Effects on Conservation Areas and Listed Buildings are considered in terms of impact on present day users and residents in addition to townscape effects.

124. The scale of the townscape and visual effects is determined by considering both the sensitivity of the townscape feature, townscape character or view with the magnitude of change. The scale of effects is described as neutral, very low, low, medium, or high. The following table provides a breakdown of how the effects are assessed and rated.

Table: Magnitude of change to views

Magnitude	Criteria
Neutral	No discernible change to townscape character arising from the development. Development is wholly compatible with existing townscape. No enhancements incorporated, so effect is neutral.
Very low – adverse or beneficial	There is a barely discernible change to aesthetic and/or perceptual attributes of townscape character and such changes occurs across a very limited geographical area and/or proportion of the townscape receptor. These may be either adverse or beneficial, such as slight design differences between established townscape and proposals. The effects are of short duration and reversible.
Low – adverse or beneficial	Adverse - Townscape features and elements of importance to the character of the baseline are lost over the site area and immediate surroundings and can be wholly restored or replaced. Beneficial – a localised improvement in features and elements at the site level and immediate surroundings. Adverse – minor aesthetic changes in townscape character come about. The Proposed Development is a minor new feature. Beneficial – minor improvements to townscape aesthetics (design or hard and soft landscape enhancements, at the site level and immediately adjacent to the site. The effects may be of short to medium duration and reversible.
Medium – adverse or beneficial	Adverse - Townscape features and elements of importance to the character of the baseline are lost over a limited area and can be partly restored or replaced. Beneficial – a localised improvement in townscape character Aesthetic and/or perceptual attributes of townscape character are affected to the extent that the Proposed Development becomes a noticeable new feature but does not compete with other aspects. This may be evaluated as either adverse or beneficial, depending on the nature of the change. The change to aesthetic/perceptual aspects occurs across a moderate geographical area and/or proportion of the townscape receptor. The effects are of medium to long duration and reversible

<p>High – adverse or beneficial</p>	<p>Adverse - Loss or irreparable damage to townscape features and elements over a wide area and/or of key importance to the character of the baseline.</p> <p>Beneficial – wide scale improvements to townscape character that has been established to be in need of improvement.</p> <p>Aesthetic and/or perceptual aspects of townscape character are affected such that the Proposed Development becomes a key additional aspect and competes with other aspects. This may be either adverse or beneficial, depending on the baseline condition of the landscape and what is being proposed.</p> <p>The effects are of long duration and/or irreversible.</p>
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125. There are nine viewpoints within a two-kilometre radius conducted as part of the TVIA assessment. The table below provides detail on the distance of the viewpoint to the development site, potential receptors, the value of the view, the susceptibility of the view, and the sensitivity of the viewpoint. The table below has omitted viewpoint 9 from the assessment as this is taken from Parliament Hill, and that specific viewpoint is discussed further below under the London View Management Framework section.

Image: Viewpoint locations

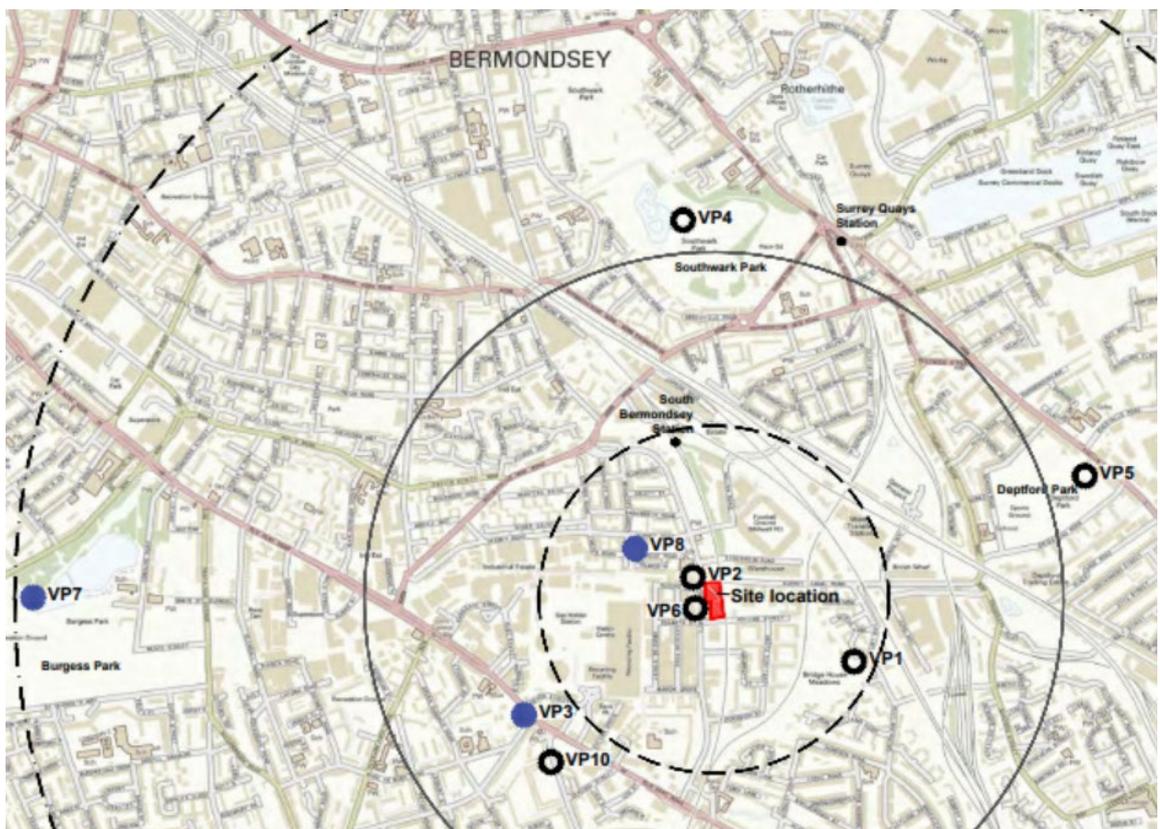


Table: Viewpoint assessment

<u>Viewpoint and Location</u>	<u>Distance to site boundary</u>	<u>Receptors</u>	<u>Value (Of view)</u>	<u>Susceptibility to change</u>	<u>Sensitivity</u>
1. Bridgehouse Meadows	0.31km	-Recreational users of Public Open Space -Cyclists -Pedestrians	Medium	Low/Medium	Low
2. Ilderton Road junction with Surrey Canal Road	24m	-Pedestrians -Road users	Low	Medium beneficial	Low
3. Old Kent Road junction with Commercial Way	0.59km	-Residents -Pedestrian -Road users	Low	Neutral	Very low
4. Southwark Park (adjacent to the Pond)	1.03km	-Recreational users of Public Open Space -Pedestrians -Cyclists	Medium	Neutral	Low
5. Deptford Park	1.06km	-Recreational users of Public Open Space -Pedestrians -Cyclists	Medium	Neutral	Low

6. Ilderton Road opposite no.212	15m	Pedestrians Road users	Very low	Neutral	Very low
7. Burgess Park (At Picnic Area)	1.9km	-Recreational users of Public Open Space -Pedestrians -Cyclists	Medium	Neutral	Low
8. Bramcote Park, Varcoe Road	0.22km	-Residents -Recreational users of Public Open Space -Pedestrians -Road users	Low	Medium	Medium
10. Asylum Road	0.6km	-Residents -Pedestrians -Road users	Very low	Very low	Very low

126. The assessment of all nine viewpoints indicates that, while the proposed development will introduce change to the subject site and its locality, such change can be accommodated without unacceptable effects on townscape character and visual amenity. While the massing and height of the building contrasts with the mainly low-rise buildings of the surrounding area, it does not conflict with the prevailing pattern of other existing or proposed developments within the wider context of OKR16 and the OKROA.

London View Management Framework

127. A number of strategic views as defined in the London View Management Framework (LVMF) (March 2012), are panoramic viewpoints located in north London. The viewsplay takes in a wide panorama of the city centre and Southwark forms a distant backdrop to these views. The views identified in the LVMF are; Alexandra Palace, Parliament Hill, Kenwood, and Primrose Hill.

128. The viewpoints mentioned above are all located at a distance of 9 kilometres and more from the subject site. The changes to the visual character of the townscape and views resulting from the proposed development of this scale and distance is not going to be discernible in the backdrop to the City and are at such a distance they have no bearing on the silhouette of key City landmarks, blending into the general urban context.

Strategic Borough Views - Southwark

129. The site is not in any Borough views.

Image: Southwark Strategic Borough Views (Subject site highlighted in red)



Conclusion on the setting of listed buildings, conservation areas and townscape

130. The following table summarises the designated heritage assets that could be impacted by the proposal, and what harm, if any has been identified.

Table: Impact on heritage significance

Listed Buildings and Conservation Areas	Assessment of Impact on heritage significance
LVMF Views	No harm identified
Local Views	No harm identified
Kentish Drovers and Bird In Bush Conservation Area	No harm identified

Listed Buildings	No harm identified owing to the height, distance and relationship of the development from nearby assets
Draft Locally listed buildings/ undesignated assets identified in the draft Old Kent Road AAP	No harm identified.

131. In conclusion, the proposed development would not have a significant impact on the views assessed despite it being a highly visible feature in the immediate townscape. Given the substantial distance to nearby heritage assets, and taking into consideration the height of the development, the scheme is considered to be a beneficial addition to the London Skyline that would successfully integrate into the immediate area and would not cause harm to any of the heritage assets listed above.
132. Whilst limited weight has been given to emerging policy, full weight has been given to adopted policies, including the NPPF (2021), London Plan (2021) and Southwark Plan (2022). As can be seen from the assessment contained within this report, the development is considered to be in compliance with these adopted policies.

HOUSING MIX, DENSITY AND RESIDENTIAL QUALITY

Housing mix

133. Southwark Plan Policy P2 seeks to ensure that a minimum of 20% of family homes with three or more bedrooms are provided in the Action Area Cores (which would apply to this Old Kent Road site) and a minimum of 25% of homes with three or more bedrooms are provided in the urban zone. The policy also requires two bedroom homes as a mix of two bedroom three person and two bedroom four person homes. The housing mix requirements are replicated in the draft OKR AAP (Policy 4).
134. Policy H10 of the London Plan relates to housing size and mix; it seeks to guide borough and developers on unit mix within new residential developments, and states that schemes should generally consist of a range of unit sizes having regard to robust local evidence, the requirement to deliver mixed and inclusive neighbourhoods and the range of tenures in the scheme.

Table – Housing Mix:

<u>Dwelling size</u>	<u>No. of units</u>	<u>Percentage</u>
1 Bedroom	53	31.18%
2 Bedrooms	82	48.23%
3 Bedrooms	21	12.36%

4 Bedrooms	14	8.23%
Total	170	100%

135. The table above demonstrates that the development would provide 68.82% of the new units as two or more bedrooms. In addition, 20.59% of units would be family homes with three or more bedrooms. This meets the percentage required for Action Area Cores. In addition following discussions with the applicant the scheme also benefits from the inclusion of all 14 four bedroom homes forming part of the social rent provision within the development.

Wheelchair Housing

136. Policy P8 of the Southwark Plan requires at least 10% of the dwellings, by habitable rooms, across the subject site to meet Building Regulation M4(3) 'wheelchair user dwellings' (with 10% of the social rented homes meeting Building Regulation M4(3)(2)(b) 'wheelchair accessible dwellings' as thus available for immediate occupation). All other dwellings will be delivered to meet M4(2) 'accessible and adaptable dwellings' standards.
137. 16 units within the scheme of the proposed new homes would meet Building Regulations Part M4(3)(2)(a) 'wheelchair adaptable', which equates to 10.5% of all dwellings by habitable rooms. The wheelchair user dwellings would be secured through the Section 106 Legal Agreement.

Density

138. The Southwark Plan does not contain specific density matrices and ranges for different areas of the borough. Instead, it sets out a range of criteria relating to good design and appropriate density in the context of a site-specific approach, including in policies P13 Design of places, P14 Design quality, P15 Residential design and P18 Efficient use of land. Criteria across these policies require among other things that:
- Development's height, scale, massing and arrangement responds positively to the existing townscape, character and context;
 - Buildings, public spaces and routes are positioned according to their function, importance and use within the townscape;
 - Adequate daylight, sunlight, outlook and a comfortable microclimate is accommodated for future and existing occupiers
 - Development provides a high standard of residential design quality
 - Development optimises the use of land and does not unreasonably compromise development potential on neighbouring sites
139. This approach is consistent with the London Plan, within which policy D3 refers to optimising site capacity through a design led approach. The quality of the proposed units, the acceptability of the height and massing, the architecture, the townscape impacts, the neighbour amenity impacts and transport implications are set out in detail in the relevant sections of this report.

Quality of residential accommodation

140. London Plan Policy D6 (Housing quality and standards) states that housing developments should be of high quality and provide adequately-sized rooms, with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners. The policy sets out a range of qualitative design aspects for housing developments relating to dwelling size, aspect, daylight, layout and amenity space. Policy P15 Residential design of the Southwark Plan sets out that development must achieve an exemplary standard of residential design and must take into consideration the site context, the impact on the amenity of adjoining occupiers, and the quality of accommodation.

Unit size

141. Policy P15 of the Southwark Plan requires developments to meet the minimum national space standard. All of the units would comfortably meet or exceed the minimum total GIA space requirements set out in the nationally described space standards and as set out in the 2015 Technical Update to the Residential Design Standards SPD. The larger units consisting of 4 bedrooms are particularly sizable which when taking into account their likely occupation by a family, is a very positive aspect of the scheme.
142. All proposed homes would exceed the minimum standard of one, two, three, and four bedroom units, in accordance with the minimum space standards as per Table 3.1 of Policy H6 of the London Plan. The following tables provide a breakdown of the range of unit sizes contained within the development.

Table: Proposed flat sizes

Unit Type	SPD Requirement (sqm)	Size range proposed (sqm)
1 Bed 2 Person (flat)	50sqm	50 – 54.4sqm
1 Bed 2 Person (WCH)	65sqm	67.5sqm
2 Bed 4 Person (flat)	70sqm	70 – 74.4sqm
3 Bed 4 Person (flat)	74sqm	76.6 – 77.4sqm
3 Bed 5 Person (flat)	86sqm	91.3sqm
4 Bed 5 Person (flat)	90sqm	92.9sqm
4 Bed 5 Person (WCH)	110sqm	113.9sqm

143. The above table demonstrates that the development has successfully designed the layout of each floor to accommodate each bedroom type without compromising the

quality of accommodation. Layouts of the flats are well proportioned with no hidden corners with an emphasis of ease of movement and circulation within each flat. Furthermore, each apartment prioritises placing the open plan living / kitchen / dining room to the front facade of the building to maximise potential for natural daylighting and views. Overall, it is therefore considered that the size and layouts of the units are acceptable, and would provide a good quality of accommodation.

Internal daylight and sunlight

144. An Internal Daylight and Sunlight Assessment has been submitted and demonstrates that the scheme achieves a high level of compliance with the BRE recommendations.

Overlooking and privacy within the proposed development

145. The unit most at risk of potential overlooking and loss of privacy within the development is the 3 bed 4 person unit in Block B, and the 4 bed 5 person WCH unit in Block A, of which both abut the first floor communal amenity space. Submitted plans demonstrate that privacy buffers will be created to mitigate against any potential overlooking or loss of privacy from within the development. In addition, the two units in Block B, one bed two person, and two bed three person, which abut the communal spaces provided on the eighth floor terrace do not show privacy buffers in the submitted drawings; however, details of the privacy buffers for all potentially affected units will be secured within the hard and soft landscaping condition attached to this decision notice.

Number of units per core

146. The design of the development has been split into two blocks; Block A, and Block B. Block A accommodates the social rent aspect of the development, with Block B providing the intermediate and private sale units. In order to maximise dual aspect units across the floor area, Block A provides a mix between two and five cores per floor, and Block B provides a mix of five and six cores per floor. The centralised location of the lift enables smaller the development to avoid long corridors on each floor. The number of units per core means that the development provides 58% of the units as dual aspect units.

Secured by Design

147. The Metropolitan Police Secure By Design officer has held discussion with the applicant and is satisfied that the development can achieve Secure By Design accreditation. Conditions recommended by the secure by design officer have been attached to this decision.

Conclusion on quality of accommodation

148. The floor layouts and size of the units proposed are a positive aspect of this development and enables the occupiers to move freely through each unit without contriving circulation and movement. The provision of children's playspace at first floor

level and an external terrace at the eighth floor for enhances the quality of accommodation for future occupiers to enjoy. It is therefore considered that the proposed development would provide a high quality of accommodation for future residents.

OUTDOOR AMENITY SPACE, PLAY SPACE AND PUBLIC OPEN SPACE

149. All new residential development must provide an adequate amount of useable outdoor amenity space. The Residential Design Standards SPD sets out the required amenity space standards which can take the form of private gardens and balconies, shared terraces and roof gardens. Policy S4 of the London Plan requires new developments to make provision for play areas based on the expected child population of the development. Children's play areas should be provided at a rate of 10sqm per child bed space (covering a range of age groups). In addition, P15 of the Southwark Plan requires the provision of 5sqm of public open space per dwelling.
150. Four categories of open space are required in major planning applications in the Old Kent Road Opportunity Area:
- Private amenity space: For units containing three or more bedrooms, 10sqm of private amenity space as required by the SPD; and for units containing two bedrooms or less, ideally 10sqm of private amenity space, with the balance added to the communal space;
 - Communal amenity space: 50sqm communal amenity space per development as required by the SPD; and
 - Children's play space: 10sqm of children's play space for every child space in the development as required by the London Plan.
 - Public open space: 5sqm of public open space per dwelling as required by the draft OKR AAP. If it is not feasible to deliver the open space on site, a financial contribution will be required.

Private outdoor amenity space

151. All of the proposed homes have been provided with private amenity space in the form of either; private balconies, or private winter gardens. The majority of homes have been designed to have at least 10sqm of private amenity space, which is a very positive aspect of the scheme, with the shortfall from each private amenity area included in the communal amenity space of the development.
152. The total amount of private amenity space proposed within the development is 1,603.40sqm. This results in a relatively small shortfall of 96.6sqm that is to be included in the provision of communal amenity space within the scheme.

Communal amenity space

153. In order to comply with the requirements of the Residential Design Standards SPD, 50sqm communal amenity space per development should be provided. This should be

provided in addition to the requirement to compensate for any shortfall in private amenity space.

154. As stated in the private amenity space consideration above, the shortfall of the private amenity has been included into the communal amenity requirement for this development. The scheme provides two communal amenity areas; one on the first floor terrace, and the other on the eighth floor terrace. Both spaces are south facing and are served by stair cores and available for use by all residents.
155. The following table summarises the communal amenity space requirements, against that proposed. All the podium and terrace communal amenity spaces would be accessible to all residents.

Table: Proposed external communal amenity space in the development, and remaining shortfall against policy requirements

Communal amenity space proposed	Proposal	Shortfall
(Shared roof or terrace space)	193sqm Required 96.6sqm +50sqm = 146.6sqm	No shortfall (46.4sqm over provision)

156. As demonstrated in the tables above, the provision of private and communal amenity space would meet and exceed the design guidance requirements.

Children’s playspace

157. The child yield for the development has been calculated using the ‘Providing for Children and Young People’s Play and Informal Recreation’ published as SPG in 2012 by the GLA using the GLA Population Yield Calculator (version 3.2).
158. The Mayor’s SPG sets out the intended strategic approach to delivering new and enhanced play space both on and off-site in new developments. It explains that ‘doorstep’ play (Under 5s) should usually be provided on-site, unless there is existing provision within 100 metres. For 5-11 year olds and children over 12 years old, it recommends that off-site provision is acceptable, if there is existing provision within 100-400 metres and 400-800 metres respectively. This is summarised in Table 4.5 of the SPG, reproduced below.

Table 4.5 of the Mayor’s Providing for Children and Young People’s Play and Informal Recreation SPG

Table 4.5 Provision of play space to meet the needs of new development

		Under 5s	5-11	12+
Existing provision	within 100 m	On site or off-site contribution	Off-site contribution	Off-site contribution
	within 100-400m	On-site	On site or off-site contribution	On site or off-site contribution
	within 400-800m	On-site	On-site	On-site or off-site contribution
No existing provision	within 100 m	On-site	Off-site provision	Off-site provision
	within 100-400m	On-site	On-site	On site or off-site provision
	within 400-800m	On-site	On-site	On-site

159. The financial contributions required in line with the Section 106 Planning Obligations and Community Infrastructure Levy (CIL) SPD (2015) would pay for ‘off-site’ provision, directly funding new and enhanced play equipment close to the site as part of a strategic approach. For example, if this scheme fell short on provision for each age group, the contribution would go towards new or existing park spaces within the OKROA.
160. Using the GLA’s latest Population Yield Calculator (v3.2) and assuming Inner London and a PTAL of 3/4, the scheme generates a total child yield of 75.7, which equates to a total play space requirement of 757sqm. In total 757.3sqm of play space is provided on site.
161. The play space areas for each age group is provided on the first floor podium and eighth floor terrace. The design would incorporate landscaped features amongst a variety of play equipment that would be suitable for both children and toddler play. This will also require the submission of detailed planting and screening, and a detailed drawing condition requiring designs of the landscape, including all play provision, will be secured by condition. The applicant has been advised that any design of playspace will need to include water and sand play as required by the draft OKRD AAP. In addition detailed design of the terrace parapets will be secured by condition to ensure the safety of those using the amenity terrace space.

Children’s playspace calculations

Table: Proposed areas of dedicated external play

Location	Area of dedicated play space
First floor podium	757.3sqm

162. The following table summarises the policy requirements for children’s play space, against that proposed.

Table showing proposed external play space in the development, and shortfall against policy requirements

Dedicated outdoor child play Space. This can be provided in either the communal or public open space but must be provided in addition to that space, rather than as a sub set of that space.	Required play space based on child yield.	Proposed play space	Shortfall
0-4 years	306.3sqm (306sqm required)	Play space proposed for all children located on the first floor podium and eighth floor terrace	0sqm
5-11 years	248sqm (248sqm required)		
12+ years	203sqm (203sqm required)		

Public open space

163. In addition to the adopted amenity space requirements set out above, emerging Policy AAP11 of the draft OKR AAP requires the provision of 5sqm of public open space per proposed home. The plan identifies that some sites are expected to provide public space as part of their redevelopment and others are not. In the later instance those site will be expected to make s106 contributions to off-site public space provision. This will be charged at £205 per square metre. As set out in the Section 106 and CIL SPD, £205 per sqm represents the average cost for improving open space in Southwark.
164. The subject site is identified within the OKR AAP as a site that is not required to provide public open space. Nevertheless it does provide 265 sqm of public space and in line with the aspirations of policy AAP 11 ‘Parks and Healthy Streets – The Greener Belt’ of the OKR AAP, where the site does not provide 5sqm of public open space per dwelling in total, a financial contribution will also be secured through the S106.

Public open space calculation

Table: Public open space proposed

Public Open Space (Public space at ground floor, excluding play space)	Draft OKR AAP (2017) requirement AAP 11: Parks, streets, open spaces –The Greener Belt. (page 73)	Proposed public open space	Off-site Payment
	Provide 5sqm of public open space per dwelling. If it is not feasible to deliver the open space on site, a financial contribution will be required.	265sqm	585sqm shortfall 585sqm x £205 = £119,925
	850sqm required		

165. As set out in the table above, a financial contribution of £119,925 would be required. The payment of the financial contribution, which would be secured through the Section 106 Legal Agreement. The money would go towards the maintenance and improvements of public parks and spaces within the Old Kent Road Opportunity Area.

Sunlight amenity analysis within the proposed development

166. BRE guidance for overshadowing to gardens and open spaces within a development recommends that at least 50% of any garden or amenity area should receive at least one hour of sunlight on 21 March. The playspace and communal amenity areas located on the first floor podium and 8th floor terrace provide the external amenity sources for residents within the scheme. Tests undertaken using the BRE guidance demonstrate that the first floor podium and 8th floor terrace, owing to their predominantly south facing locations adhere to the BRE recommendations for sunlight amenity within developments.

Conclusion on outdoor amenity space, playspace and public open space

167. In conclusion, the private, communal and playspace proposals are of an exceptional quality with all provision provided on site. The locations of the amenity spaces are well thought out with south and southwest facing amenity spaces that enables the areas to maximise benefit from natural daylight and sunlight. The mix of private amenity options including balconies and winter gardens are well positioned and spacious for residents to enjoy. The children’s playspace proposals are supported by officers and would provide a mix of imaginative and informal play options for children within the development. The landscape proposals for the external terrace areas are efficiently planned which is a positive aspect of the scheme. To ensure the spaces delivered are

of the highest quality, detailed landscape design and children's playspace are secured by condition and attached to this decision notice.

168. In addition to the above some public open space is provided on the site as well as agreed financial contributions that would directly fund the maintenance of areas of open spaces and parks within the opportunity area as required by the draft AAP. Overall, the provision of private, communal and children's playspace amenity on site is a significantly positive aspect of the scheme.

IMPACT OF PROPOSED DEVELOPMENT ON AMENITY OF ADJOINING OCCUPIERS AND SURROUNDING AREA

169. Policy P56 (Protection of amenity) of the Southwark Plan states that developments should not be permitted when it causes an unacceptable loss of amenity to present or future occupiers or users. This includes privacy and outlook impacts, overlooking or sense of enclosure, loss of daylight and sunlight, and unacceptable noise from developments.

Impact of the proposed uses

170. The retention of the existing Jewson with an improved facility along with the introduction of residential uses to the upper floors is considered to provide activation of the site at ground floor level, and would enhance the vitality and vibrancy of Ilderton Road. The proposed uses comply with the intentions of this site within OKR16 of the OKR AAP. On this basis, it is considered that the proposed uses would not cause any harm to surrounding neighbour amenities, and accordingly are all found to be acceptable uses.

Daylight and sunlight impacts

171. The following section of this report details the potential daylight, sunlight, and overshadowing impacts of the proposed development on surrounding residential properties. This analysis is based on guidance published by the Building Research Establishment (BRE). As required by Regulations, the submitted assessment has been undertaken by competent, experienced, registered professionals.

BRE daylight tests

172. Guidance relating to developments and their potential effects on daylight, sunlight, and overshadowing is given within the 'Building Research Establishment (BRE) Report 209 Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice 2nd Edition (2011)' (BRE, 2011) and also in 'Lighting for Buildings Code of practice for daylighting (AMD 7391) BS 8206-2:1992' (BSI, 2008). The Building Research Establishment's (BRE) Site Layout Planning for Daylight and Sunlight, a guide to good practice (1) gives criteria and methods that are explained subsequently for calculating DSO effects on surrounding receptors as a result of the proposed development.

173. While the BRE benchmarks are widely used, these criteria should not be seen as an instrument of planning policy. As stated in the Introduction to the BRE Guidelines paragraph 1.6:

“The guide is intended for building designers and their clients, consultants and planning officials. The advice given here is not mandatory and the guide should not be seen as an instrument of planning policy; its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design.”

174. Diffuse daylight is the light received from the sun which has been diffused through the sky. Even on a cloudy day, when the sun is not visible, a room will continue to be lit with light from the sky. This is diffuse daylight. Diffuse daylight calculations should be undertaken to all rooms within domestic properties, where daylight is required, including living rooms, kitchens and bedrooms. The BRE guide states that windows to bathrooms, toilets, storerooms, circulation areas and garages need not be analysed. These room types are non-habitable and do not have a requirement for daylight.
175. The BRE guideline tests undertaken for this daylight assessment are the Vertical Sky Component (VSC) and No Skyline (NSL). The VSC test calculates the angle of vertical sky at the centre of each window and plots the change between the existing and proposed situation. The target figure for VSC recommended by the BRE is 27%, which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE also advises that VSC can be reduced by about 20% of its original value before the loss is noticeable. In other words, if the resultant VSC with the new development in place is less than 27% and/or less than 0.8 times its former value, then the reduction in light to the window is likely to be noticeable.
176. The distribution of daylight within a room can be calculated by plotting the NSL. The NSL is a line which separates areas of the working plane that do and do not have a direct view of the sky. Daylight may be adversely affected if, after the development, the area of the working plane in a room which can receive direct skylight is reduced to less than 0.8 times its former value.

BRE sunlight tests

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

Overshadowing

178. Section 3.3 of the BRE guidelines describes the method of assessment of the availability of sunlight within garden/amenity spaces. This relates to the proportion of shading on March 21st. The BRE criteria for gardens or amenity areas are as follows, 'It is recommended that for it to appear adequately sunlit throughout the year, at least half of a garden or amenity space should receive at least two hours of sunlight on 21 March. If as a result of a new development an existing garden or amenity space does not meet the above, and the area which can receive two hours of sunlight on 21 March is less than 0.8 times its former value, then the loss of amenity is likely to be noticeable.'
179. The closest properties to the development consist of a mix of residential and commercial buildings. These properties are:
- 209-225 Ilderton Road,
 - 60a and 62 Hatcham Road/134-140 Ilderton Road
 - 179 Ilderton Road (Atar House)
 - 180 Ilderton Road
 - 227-255 Ilderton Road
 - Surrey Canal Site (London Borough of Lewisham)

Image: Plan demonstrating subject site (Pink), consented context (Blue), and built context (Grey)



Impacts

209-225 Ilderton Road

Image: Context of 209-225 Ilderton Road to subject site



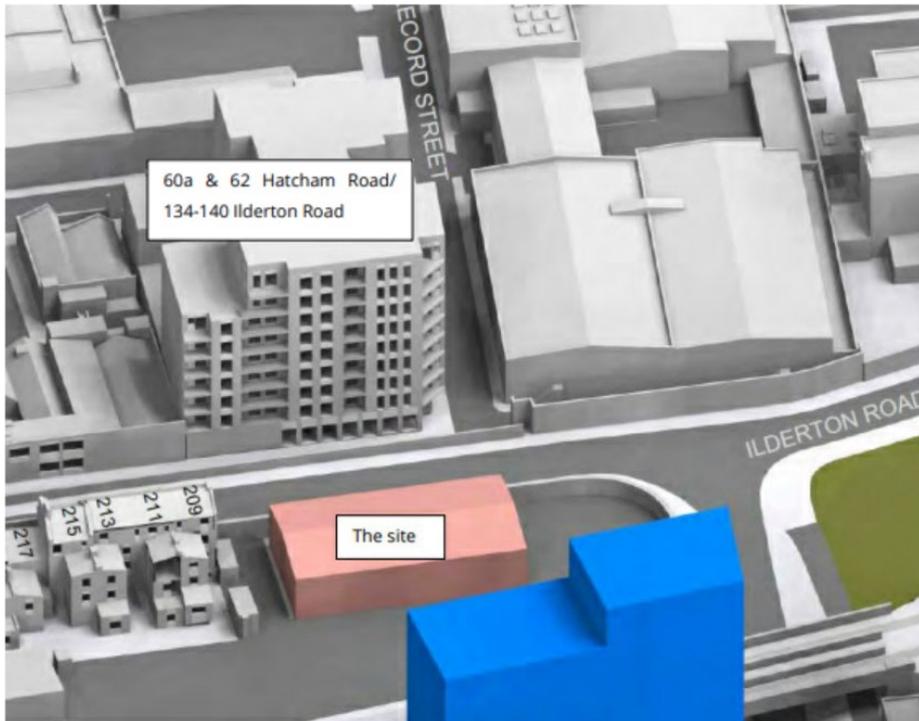
180. The existing VSC values are reflective of the above image, with unobstructed values in the region of circa 25%VSC-30%VSC. The self-constrained areas (i.e., adjacent the rear extensions) by contrast record circa 5%-15% VSC, reflective of their obstructed locations.
181. Post-development, 36 of the 45 windows analysed (i.e., 80%) would either retain in excess of the default BRE targets or experience no noticeable change from their baseline VSC figure. Of the nine remaining windows, seven are located at 209 Ilderton Road, the end terrace house with an unusually open outlook across the site adjacent discussed above. One is understood to serve a bathroom, and on this basis can be disregarded given its non-habitable room. The remaining six are all located in the rear section of the property, overlooking the site.
182. Post-development, the retained VSC values for these six windows would be comparable to the neighbouring houses in the terrace of similar design but which do not have the unusual open aspect across the site, but rather face their neighbouring rear extension. The change from this unusually high baseline would inevitably be noticeable; however, the retained values are considered acceptable. The remaining two windows not meeting the default BRE recommendations are located in the self-obstructed area to the rear of 213 Ilderton Road, where small absolute/ shift changes record as misleadingly high percentage differences. The two rooms served by these windows feature a second, unaffected window which means internal conditions are less affected and therefore the effects are considered acceptable.
183. Regarding NSL tests undertaken, the results showed a very similar pattern as the VSC results with 34 of the 36 habitable rooms analysed, equating to 94% of rooms, showing either none or unnoticeable changes post-development. The two habitable rooms

recording potentially noticeable changes are both located in the side elevation at 209 Ilderton Road directly on the boundary with the site and are understood to be served by one window facing towards it. The change to bedroom R1/104 is circa 10% absolute NSL, translating to a percentage difference of 24.69%. This is slightly above the 20% at which the BRE considers changes may become noticeable. Given its use and retained value the effect is considered acceptable.

184. The remaining room is annotated R1/105 in the assessment drawings within the daylight/sunlight report. As demonstrated, this is a living area which we understand has been subdivided from the original larger room to provide a separate kitchen. This has had the effect of this room being served by a single window, which is located directly on the site boundary and overlooking the unusually low-rise massing presently occupying it, a situation in which the BRE predict a greater degree of change is inevitable.
185. The design in this area has been carefully considered, resulting in an immediate scale/outlook comparable to the neighbouring terraces which have the more usual side extension to side extension arrangement. The design also includes for an area of new planting between the terrace and the covered yard and a generally improved outlook when compared to the current one i.e., an attractive and robust brick building with the majority of activity contained within. On balance, it is therefore considered that the effect is acceptable.
186. Regarding sunlight impacts, given the location of the proposed development to the north of the terrace, the analysis demonstrates no material change to existing APSH values.

60a and 62 Hatcham Road/134-140 Ilderton Road

Image: Context of 60a and 62 Hatcham Road /134-140 Ilderton Road to subject site



187. The potentially affected site adjacent to the subject site is currently in the final stages of completion. To assess the likely impact on other proposed new developments where detailed internal layout are available and window positions are finalised, the BRE Guidelines state that the Average Daylight Factor (ADF) test is most appropriate. ADF provides an absolute measure of daylight expressed as a ratio of daylight for the room in question as a proportion of the daylight outside at any moment in time. The ADF for a living room should be above 1.5% (i.e. the room should enjoy a minimum of 1.5% of the average external daylight at any moment in time), whilst that for a bedroom and kitchen should be in excess of 1% and 2% respectively.
188. The assessment detailed has shown that the most at risk properties to potential daylight loss are located on the lower floors levels of the residential accommodation facing the subject site, namely floors 1 and 2. The assessment demonstrates that the ADF values in the scenario for the four combined living/kitchen/dining (LKD) areas facing the site ranged from 0.2%ADF to 1.7%ADF, all below the default BRE/BS target. The four bedrooms are served by windows solely facing the site and their results ranged from 0.6%ADF to 1.3%ADF. As such, one habitable room (an unobstructed bedroom) met the default recommendation.
189. In the proposed condition, the four living areas would achieve comparable ADF values when compared to those consented, ranging from 0.81%ADF to 1.22%ADF. In particular, the consented value for the lowest LKD as shown above would significantly improve from 0.2%ADF to 0.81%ADF. This pattern continues for the rest of the elevation facing the site, with the retained proposed ADF values being comparable

with the consented in general and also significantly improving the lowest ones. Given the above assessment it is therefore considered that the proposed ADF values are acceptable.

190. Also undertaken for this daylight assessment on the potentially affected properties was the NSL methodology. The assessment demonstrated that of the 90 habitable rooms facing the site, 52 (i.e., 58%) would achieve the default BRE recommendations post development. When taking into account the context and design of the façade assessed, this is a high overall value. The remaining 38 rooms are comprised of 24 bedrooms (i.e. 63%) and 14 combined LKD rooms. The BRE guidance sets out that NSL to bedrooms is less important, given their mainly night-time use. Retained NSL values for the LKDs are due to their design, whereby they are served by a single window and over 5m in depth. Paragraph 2.2.10 of the BRE guidance states that *“if an existing building contains rooms lit from one side only and greater than 5m deep, then a greater movement of the no sky like (NSL) may be unavoidable.”* It is therefore considered that the retained NSL values are acceptable.
191. The potentially affected windows serving this property are orientated due east. Therefore any dwellings would not have any reasonable expectation of sunlight amenity aside from a certain point of the day, in this case the morning, and were not assessed, in line with the BRE guidance.

179 Ilderton Road (Atar House)

Image: Context of 179 Ilderton Road (Atar House) to subject site which is located to the south out of view



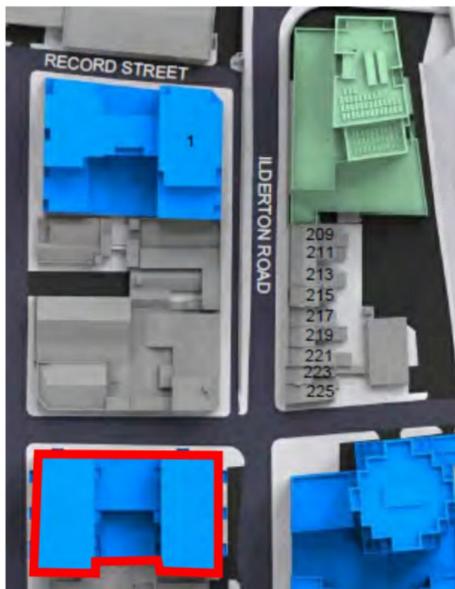
192. Atar House is located directly to the north of the site, across Pat Hickson Gardens. As seen in the image above, the elevation facing the site features recessed windows understood to serve living areas. These are obstructed both above and beside the window. In these types of situations, the BRE predict their default guidance may not be possible to achieve. Post-development of the subject site, 41 of the 47 windows analysed (i.e., 87%) would either retain in excess of the default BRE targets or

experience no noticeable change from their baseline VSC figure. The six remaining windows are all located in the recessed areas discussed above, where they record materially lower baseline VSC values as a result.

193. As predicted in the BRE guidance, small absolute/ shift changes of circa 2%VSC would be expressed as misleadingly high percentages of over 20%. Whilst these can signal noticeable differences when applied to higher VSC values, the actual change between the existing and proposed VSC values for these windows is sufficiently small to be considered a “no-worsening” of the baseline. Given the results for unobstructed areas directly adjacent, it can be concluded that if an alternative “without balconies” assessment was to be undertaken for these 6 windows, it would demonstrate that their recessed nature is the main contributor to the percentage changes recorded, particularly considering the distance between the flank elevation of this site and the subject site.
194. The NSL results take into account conditions within rooms served by more than a single window and these all showed either none or small, imperceptible changes post-development.
195. Regarding sunlight impacts, the two bedrooms, located in the self-obstructing recessed areas of the elevation mentioned above, would experience slightly greater than 20% change to their existing APSH, again this is because the existing values are very low due to their design. Small actual/ shift changes in APSH therefore result in misleadingly high percentage value changes. As set out in the BRE guidance, the overall annual loss of APSH for these two bedroom windows is no greater than 4% and therefore will not be adversely affected.

180 Ilderton Road

Image: Context of 180 Ilderton Road (outlined in red) to subject site (green)



196. Given the distance of the development from the subject site, the VSC façade renders confirmed retained VSC values on the extant consented potentially affected facades would range between 30%VSC- 35%VSC in unobstructed areas.
197. In terms of the sunlight test, the potentially affected facades at 180 Ilderton Road are orientated due north. Therefore any dwellings would not have any reasonable expectation of sunlight amenity and were not assessed, in line with the BRE guidance.

227-255 Ilderton Road

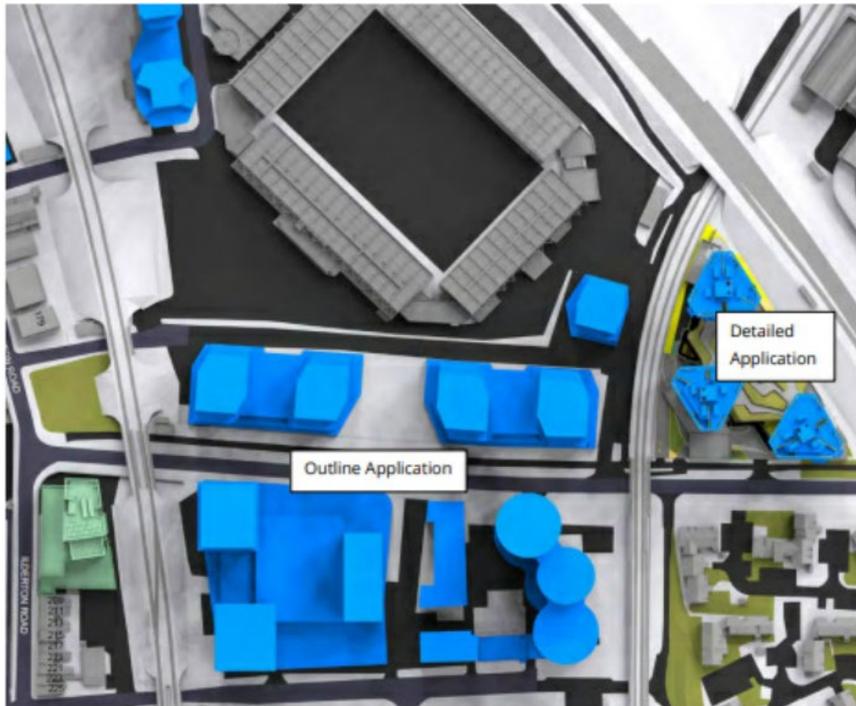
Image: Context of 227-255 Ilderton Road (outlined in blue) to subject site (green)



198. Much like with the findings from the assessment undertaken on the impacts at 180 Ilderton Road, the VSC façade renders confirmed retained VSC values on the extant consented potentially affected facades would range between 30%VSC- 40%VSC.
199. In assessing any sunlight impacts, the potentially affected facades of the consented 227-255 Ilderton Road scheme are orientated due north. Any dwellings located here would not have any reasonable expectation of sunlight amenity and therefore were not assessed.

Surrey Canal Site (London borough of Lewisham)

Image: Context of Surrey Canal Site (blue) to subject site (green)



200. It is acknowledged that the closest part of the Surrey Canal redevelopment is in outline, and would be located to the rear of the subject site. Notwithstanding this, VSC tests were undertaken. The VSC façade renders confirmed retained VSC values on the extant consented potentially affected facades would range between 25%VSC-40%VSC. As such, the proposed development would not prevent adequately lit dwellings to be designed here.
201. Regarding sunlight impacts, the potentially affected facades are orientated west, therefore subject to the same considerations set out above, i.e. that any dwellings placed here are likely to be considered insufficiently sunlit given the lack of a more southerly orientation. Notwithstanding this, APSH façade renders confirmed retained APSH values would range between 20%APSH- 40%VSC. Therefore, the proposed development would not prevent adequately sunlit dwellings to be designed.

Overlooking of neighbouring properties

202. In order to prevent harmful overlooking, the Residential Design Standards SPD requires proposed developments to achieve a distance of 12m between the front elevations of buildings and/or across a highway, and a minimum of 21m between rear elevations.
203. The subject site sits on a corner plot at the junction of Surrey Canal Road and Ilderton Road. Therefore the most at risk property for potential overlooking impacts is the adjacent development at 60 and 62A Hatcham Road/134-140 Ilderton Road. This site sits across the highway from the subject site. The existing distance between the front

elevation of 60 and 62A Hatcham Road/134-140 Ilderton Road is circa 20 metres. Given that the proposed development would be setback slightly from the current building line of Jewson, the distance will exceed the minimum separation distance of 12 metres as set out in Southwark's SPD.

TRANSPORT CONSIDERATIONS

204. Policy P50 'Highways impacts' of the Southwark Plan 2022 seeks to ensure that developments minimise the demand for private car journeys. In addition, the policy requires developments to demonstrate that the road network has sufficient capacity to support any increase in the number of the journeys by the users of the development, taking into account the cumulative impact of adjoining or nearby development. As this is a Southwark council application and therefore any requirements will be contained in the unilateral undertaking.
205. In assessing this application from a transport perspective, the site is located in an area that the council is considering pedestrian, and cycle changes to enable healthy streets. The proposals will not prevent these plans being delivered.
206. Southwark have recently adopted their Movement Plan, a people, place and experience approach to transport planning rather than a modal one. This application has been assessed on how it will contribute to the 9 Missions.
207. The Mayors Transport Strategy (MTS) Mayors Transport Strategy (MTS) includes three strategic challenges that are of significant importance to assessing this application.
- Good Growth
 - New homes and jobs
 - A good public transport experience
208. The submitted Transport Assessment (TA) is considered to provide an adequate appraisal of the relevant transport and highway related matters including an assessment of the potential for journeys to be made by sustainable modes of transport as well as detailed estimates of vehicular trips resulting from the development.
209. Officers have reviewed this application and identified the following areas for detailed comments:
- Access and Road Safety – The safe movement of all modes entering and exiting the public highway
 - Trip Generation –The existing and proposed trips related to the site
 - Servicing and Delivery – How the development will manage the vehicular trips required
 - Car Parking - How the development will manage the vehicular trips required
 - Public Transport – Current access and future potential
 - Active Transport – Walking and cycling and behaviour change

Existing site layout

210. The site is located along the eastern side of Ilderton Road. The site is bound by Surrey Canal Road to the north, Ilderton Road to the West and Rollins Street to the South and the Railway line to the East. At present the site includes a builders' merchants with vehicular access from Rollins Street. Surrey Canal Road provides access into the London Borough of Lewisham and accommodates a Cycle path to the northern side of the road. Rollins Street is a 300m long cul-de-sac, which provides a pedestrian/cycle access only from its terminus to the residential area to the east. Due to the proximity of Millwall Stadium on match days there are a lot of extra vehicle movements in the area. The rear of the site is bounded by the railway line.

Proposed site layout

211. The proposed future site layout will increase footway widths improving the pedestrian movement along Ilderton Road. The proposed access arrangements and loading bay will be detailed up as part of the S278 agreement. The Council programme for the CPZ includes this area and subject to consultation will be implemented within the next two years. The Council is introducing improved cycle routes from Rotherhithe to Peckham, this proposal does not impede on that project. The traffic management related to the site separates residential movement and industrial vehicle movement. Residential vehicular movement will be restricted to the entrance at Surrey Canal Road with commercial vehicular access focused from Rollins Street. A Condition requirement for the detailed design of the landscaping and public realm will ensure secure by design and road safety is fully considered.
212. The proposal included tracking of the yard access and residential access ensure sufficient swept paths for a variety of vehicle sizes. All works within the extent of the S278 for Southwark will be done in accordance with Southwark Street Design Manual SSDM and TfL's Healthy Streets design guidance. A condition requirement for the detailed design of the landscaping and public realm will ensure secure by design and road safety is fully considered.

Trip generation

213. The proposed scheme will generate largely sustainable methods of trips, and the TA estimates servicing demand for the 22 motorised vehicular trips per day.

Servicing and delivery

214. Delivery and servicing for the residential element of the scheme will be located in a servicing area located off of Surrey Canal Road. It has been agreed with Southwark Transport and Highways officers that access to this servicing area is to be explicitly signed as "left-in left-out" only, covered by a Traffic Regulation Order, and funded by the applicant. This is considered to be an appropriate mitigating factor to relieve potential traffic issues on Surrey Canal Road in line with comments made by Lewisham Borough on this arrangement.

215. As part of the proposals the completed site will be supported by a concierge / management team and it is proposed that this Concierge along with the Travel Plan Co-Ordinator will act as the co-ordinator of this Delivery Service Management Plan (DSMP). As part of their duties the Concierge will manage and control the flow of delivery and servicing vehicles to the dwellings which will be managed through the use of a booking system for all residents.
216. The booking system shall be limited to allow for only one delivery to occur within an allotted 10 minute time slot. This would limit and manage the use of the loading bay where possible. It will also be the duty of the Concierge to include within the booking system the times of regular delivery and servicing arrivals, such as postal and refuse vehicles. The Concierge will store handheld sized non-food goods for residents in the event they are not at home when a delivery is made with larger goods returned to the depot. Deliveries by supermarkets will not be accepted by Concierge.
217. In order to ensure that on-street servicing and deliveries do not negatively impact on the highway network, the Council is recommending that applicants in the Old Kent Road Opportunity Area enter into Delivery Service Plan Bonds against their baseline figures for all daily servicing and delivery trips. These bonds would be calculated at £100 per residential unit and £100 per 500 sqm of non-residential floor space. In accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010, this is not intended as a financial penalty, but as a means of mitigating any harmful impacts from the proposed development and ensuring a better quality of life for current and future residents. As such, it is considered to meet the CIL Regulation 122 test, in that it would be:
- (i) necessary to make the development acceptable in planning terms;
 - (ii) directly related to the development; and
 - (iii) fairly and reasonably related in scale and kind to the development
218. The proposal is for the concierge / management of the new development to monitor the daily vehicular activity of the site for both commercial and residential accommodation, quarterly for a period of 2 years from 75% occupancy. If the site meets or betters its own baseline target the bond will be returned within 6 months of the end of the monitoring period. If the site fails to meet its own baseline the bonded sum will be made available for the council to utilise for sustainable transport projects in the ward of the development. It is also noted that the commercial deliveries to the development will follow the existing arrangements currently in place for Jewson.
219. All uses in the development will be subject to a condition on the marketing and promotional material related to the work to ensure this is explicit in how the development has been designed to discourage private cars and encourage sustainable living, working and visiting. In addition, a final DSMP is secured by condition and attached to this decision notice.

Car parking

220. The residential element of the development will be car free, excluding the provision for three blue badge spaces with electric charging points. The strategy for disabled parking provision has been based on pre-application consultation with Southwark officers and is designed to accommodate predicted need and be flexible given the

quantum of development within the area and the wish to avoid the over provision of on street disabled parking spaces which have or will be provided by adjacent developments.

221. The commercial aspect of the development will retain 8 existing car parking spaces. Given the nature of the business which sells wholesale building materials, a level of car parking is required to enable customers to transport their purchases from the site. To adhere to the principles of sustainable methods of transport, Electric Vehicle Charging Points are to be conditioned to be installed in the commercial car parking area to encourage customers in their use of transportation. There will be a S106 obligation that prevents residents and office users of the proposed development from obtaining resident parking permits.

Public transport

222. The site is served directly by local bus route P12, and is within 600m of the junction with Old Kent Road where more bus services are located. The nearest rail station to the site is South Bermondsey Station which is located circa 415m north of the site, or a 7 minute walk. As a borough Southwark agrees with TfL that bus services will need to be increased in the area ahead of the BLE to accommodate the demand generated by additional homes and jobs generally in the Old Kent Road area. The requirement for TfL to provide evidence to prove both previous contributions has been spent appropriately and the evidence for the further draw is the fairest way this could be managed. The proposal is that there is a maximum cap for TfL to call on which is £2,700 per unit.

Active transport

Walking and public realm

223. The TA does include an Active Travel Survey. The development is located nearby to Bramcote Park, Bridgehouse Meadows in the London Borough of Lewisham, and adjacent to Pat Hickson Gardens and further across Southwark. The application has increased the footway width of Ilderton Road this will be delivered through the S278 agreement.

Cycling

224. The site is located close to Quietway 1 which links Greenwich with the West End. In addition, there are a number of cycle routes within close proximity to the site. These routes provide useful connections to key public transport interchanges, such as South Bermondsey, Elephant and Castle and London Bridge. Cycle parking will be provided in line with the London Plan 2021 standards. The proposals will provide 322 secure and covered cycle parking spaces for residents, which will be provided as a mix of Sheffield stands and stacked stands. 6 short-stay cycle spaces are also proposed and will be located at the entrance from Surrey Canal Road. The commercial element proposes 8 long-stay spaces and 4 short-stay spaces. The long-stay cycle parking will be located within a shelter in the external yard, with short-stay spaces in the public realm in front of the residential blocks on Surrey Canal Road, close to the workspace

entrance. A condition is attached to this decision required detailed design of the cycling parking provision. The S106 Agreement will include a contribution towards the delivery of a new Cycle Hire Docking station of £50 per residential unit.

Construction

225. A Draft Construction Management Plan has been prepared as a standalone document submitted along with this application. The S106 Agreement would secure a detailed Construction and Environmental Management Plan (CEMP) and a £40 per unit contribution for Construction Management within the OKR AAP area. This is to enable the Council to manage cumulative impacts on the highways and environment.

Conclusion on transport

226. The proposal is supported as it will reduce car dependency which will contribute to the efforts against climate change and to the delivery of some of the Movement Plans 9 missions. In particular, these include Vision Zero and Healthy Streets, and allows for the emerging plans for the surrounding public highway to be facilitated subject to the adherence to the S106 obligations and planning conditions mentioned in this section of the report.

ARCHAEOLOGY

227. The site is within the 'Bermondsey Lake' Archaeological Priority Zone (APZ), which is designed to protect the palaeological environment and prehistoric archaeology recovered from the shoreline and relict fills of the large Late Glacial Bermondsey Lake and the associated riverine geology and topology. The site is also close to the 'Old Kent Road' APZ, which has the potential to contain features associated with the former route of 'Watling Street', the major Roman road between London and Canterbury. When the New Southwark Plan is adopted, the site will lie within the newly extended 'North Southwark and Roman Roads' Tier 1 Archaeological Priority Area (APA).
228. Policy P23 of the Southwark Plan 2022 requires that applications affecting sites within Archaeological Priority Areas (APAs) will be accompanied by an archaeological assessment and a report on the results of a field evaluation of the site, including an assessment of the impact of the proposed development on the archaeological resource.
229. A Desk-Based Assessment by BWB consulting has been submitted as part of this application. Southwark's Archaeologist has reviewed the DBA and raises no objection to the development given that the DBA adequately summarises the archaeological potential of the site. Southwark's Archaeologist recommends conditions requiring an archaeological evaluation, subsequent mitigation works and foundation design should be applied to the decision notice. In addition, any site investigation should be monitored by suitably qualified archaeologists. Much of the archaeological interest of this site comes from geoarchaeological deposits whose presence can be identified through monitoring of such works.

AVIATION

230. The National Air Traffic Safeguarding Office (NATS) were consulted on the development, but at the time of writing, have not responded to the consultation request.

TV AND RADIO SIGNALS

231. Arqiva own and operate the UK Terrestrial Television Broadcast network and supply the Freeview platform. They also own and operate 90% of the UK Radio Broadcast network, through which they broadcast the full range of BBC and commercial radio stations. In addition, many sites that they own or manage are shared by other operators, such as BT, the Mobile Network Operators, Airwave (Emergency Services Networks), roadside services and Central and Local Government departments and agencies.
232. Arqiva did not respond to a consultation letter regarding the development sent on 14/09/2021. It is therefore considered that Arqiva do not have an objection to the proposed development.

ENVIRONMENTAL CONSIDERATIONS

Refuse and waste

233. A Waste Management Strategy has been submitted with the application which outlines the waste proposals over all phases of the development. The waste generation metrics used in this Strategy are based on Southwark's Waste management guidance notes for residential developments.
234. Each block will have a separate refuse store that is located on the lower ground floor. The quantity of bins has been calculated following Southwark's waste management policy with each residential core having level access from the lifts to the refuse stores at this level. Bin stores will be monitored over the course of the week by on-site building management and will be rotated should bins at the front of the store become full. Bulky refuse storage has also been included adjacent to the bin stores.
235. Due to the level changes on the site between the lower ground floor and Ilderton Road, a management strategy will be in place for on-site staff to move the refuse bins to the kerb side on collection day via a platform lift with a travel height of 800mm. Refuse will be collected from Ilderton Road as refuse vehicles already stop on this section of road for collections from the neighbouring terraces.
236. Southwark Waste Management Officers and Highways Officers have raised concerns over the presentation of bins on the public highway. In acknowledging these concerns, it must be stated only the residential refuse will be collected from the street, and will be a once-a-week operation. The commercial waste will be collected from the external

yard of Jewson. Taking into consideration the constraints of the site, it would not be possible to create a loading bay within the development itself for refuse vehicles. Additionally, the residential waste collection is unable to be collected from the external yard as Jewson requires their operations to be separate for liability purposes.

237. Furthermore, as the redevelopment of the site includes the widening of the footway along Ilderton Road, this will enable the bins to be accommodated at the back of the footway. As part of the management strategy, the concierge will ensure that the bins are ready for collection in advance of the refuse vehicle arriving. This will include moving the bins from the bin store and then placing them at the back of the widened footway. These will then be returned to the refuse store as soon as the collection is completed. The current footway width will therefore be maintained at all times.

Wind and microclimate

238. The report demonstrates that the meteorological data for the subject site shows prevailing winds from the southwest quadrant throughout the year with the secondary winds being predominantly from the direction of northeast that are more prevalent in the spring months. The baseline scenario, contained within the report as Configuration 1, assesses the wind condition of the existing site. The results indicate that there are no instances of strong winds that would amount to any safety concerns for pedestrians.
239. Configuration 2 within the report focuses on a pre-mitigated scenario which demonstrates that there would be unsuitable wind conditions both at ground and upper-level areas of the proposed development which includes thoroughfares, amenity spaces, balconies, and entrances. Furthermore, there would be strong winds with a potential for safety concerns at a thoroughfare in the northwest corner of the building, the three amenity spaces on the 8th floor terrace, and balconies between the 4th and 7th floors, and 12 to 21 floor levels on the southwest corner, and balconies between the levels 12 and 23 at the northwest corner. The findings demonstrate that these locations would require mitigation measures to ensure a safe wind environment for pedestrian, cyclists and residential occupiers.
240. Taking into consideration the potential harm above, mitigation measures in the form of landscaping measures including shrubs/hedging or dense planting to a height of 1.5m to be located at the south of seating areas within the development. Additional mitigation measures include 50% porous balustrade 1.1m in height to balconies potentially affected, and a full height 50% porous screen between the column and façade at the northwest corner, at the undercut of the building. With the proposed landscaping scheme and wind mitigation measures in place (Configuration 4), all locations within and around the proposed development would have suitable wind conditions for the intended use. There would also be no instances of strong winds with potential for safety concerns.

Fire strategy

241. Policy D12 of the London Plan 2021 expects all development proposals to achieve the highest standards of fire safety and to this end requires applications to be supported by an independent Fire Strategy, produced by a third party suitably qualified assessor.

242. A fire statement form and fire safety strategy by Jensen Hughes has been submitted with this application. The strategy demonstrate how the development would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel. The provision of a suitably-sized evacuation lift in the residential core is also proposed in line with Policy D5 of the London Plan. The measures contained within the statements are secured by condition within the decision notice. GLA Officers and London Fire Brigade Officers have reviewed the submitted Fire Statement and Strategy, and raise no objection to the information within the document.

Flood Risk and water resources

243. The application site is located within Flood Zone 3 of the River Thames which is tidally influenced at this location, although in an area shown to be benefiting from existing flood defences. Flood Zone 3 is classified as comprising land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%) or a 1 in 200 or greater annual probability of tidal flooding (>0.5%). Flood defences are indicated to be in good condition and afford the Site a standard of protection up to the 1 in 1000 year event.
244. The Environment Agency (EA) has reviewed the submitted information in relation to flood risk and has no objection to the proposed development.
245. The site is currently wholly developed comprising two existing Jewson buildings and an external service yard. The development proposals will aim to reduce the peak run-off rates from the site to as close to the greenfield runoff rates as is feasible. The Council's Flood Risk Team has reviewed the revised Sustainable Drainage Statement and 24.0l/s is acceptable, based on the runoff being reduced to 1.5l/s and the remaining site area (0.102ha) being discharged at 22.5l/s. This results in an improvement on the existing runoff rates currently on site. A pre-commencement condition has been attached to the decision notice seeking full details of the proposed surface water drainage system incorporating Sustainable Drainage Systems (SuDS). A pre-occupation condition seeking a Drainage Verification Report is also attached to the decision notice.

Ground conditions and contamination

246. A Phase 1 Environmental Study has been undertaken by BWB Consulting. The study has found that the site has been utilised as a wharf, timber yard and a builder's yard in the north and central area and for residential housing for a small period of time in the south. Above ground storage tanks have also been present in the north east and a sunken petrol tank in the centre of the site. The surrounding land has undergone extensive development of both industrial and residential purposes including various works, railways, factories and depots.
247. The ground conditions at the site are anticipated to comprise varying thicknesses of hardstanding over superficial deposits of Alluvium and the Kempton Park Gravel Member, overlying a small strip of Thanet Formation bedrock in the south beneath which is the Lewes Nodular Chalk Formation. Made Ground is anticipated to be present on site due to historical developments in the south and an infilled canal along

the northern boundary. Additionally, significant potential pollutant linkages have been identified, such as the infilled canal, unspecified tanks, underground fuel storage tanks, and timber yard on site which have the potential to have an impact on site.

248. Southwark's Environmental Protection Team (EPT) has reviewed the Phase 1 assessment and following review recommends that a Phase 2 site intrusive investigation is undertaken before any works commence on site. The recommended condition is attached to the decision notice.
249. The Environment Agency have reviewed the proposals in relation to contaminated land and made the following recommendation.
250. "The 'Phase 1 Geo-environmental Assessment and Geotechnical Risk Register' by BWB (dated December 2021, ref.JIR-BWB-ZZ-XX-RP-YE-0001_PH1_P2 rev.P03) in support of this planning application, provides us with confidence that it will be possible to suitably manage the risk posed to controlled waters by this development. Further detailed information will however be required before built development is undertaken."

Air quality

251. The subject site is located in the Southwark Air Quality Management Area which is designated for the potential exceedance of the annual mean nitrogen dioxide (NO₂) and daily mean PM₁₀ air quality objectives. Southwark Plan Policy P65 'Improving air quality', states that development should address the impacts of poor air quality on building occupiers and public realm users by reducing exposure to and mitigating the effects of poor air quality.

An Air Quality Assessment compiled by BWB Consulting has been submitted with this application. The assessment concludes that pollutant concentrations are predicted to be below the relevant air quality objectives and the proposed development, once operational, will be better than air quality neutral. Mitigation measures are recommended to reduce the potential for temporary dust impacts during construction. Southwark's EPT Officer has reviewed the AQA and raises no objection to the information contained within the assessment.

Noise and vibration

252. A noise and vibration assessment (and a subsequent addendum) have been submitted in support of this application, prepared by BWB Consulting. The report demonstrates a robust glazing specification would provide internal noise levels for all residential environments which would comply with the British Standard for residential accommodation. EPT Officers agree with the findings of the report and recommend conditions be attached to safeguard the amenity of occupiers within the development and nearby residents and businesses. The conditions recommended are attached to this decision notice.

Agent of change

253. Where new noise- and other nuisance-generating development is proposed close to residential and other sensitive uses, Policy D13 of the London Plan 2021 requires the proposal, as the incoming 'agent of change', to be designed to mitigate and manage any impacts from existing sources on the future users/occupiers. Developments should be designed to ensure that established noise and other nuisance-generating uses remain viable and can grow without unreasonable restrictions placed on them.
254. To the northwest of the subject site is an existing scaffolding yard and waste operation adjacent past the railway line. The impact of these sources has not been assessed in accordance with BS4142. The monitoring conducted was automated and hence it is not clear what impact these commercial/industrial sources may have.
255. EPT Officers have reviewed the information, and in respect of Agent of Change principles, have recommended that an acoustic survey will need to be undertaken for existing noise in industrial areas. This is to be secured by condition before acoustic details are agreed, and the condition is attached to this decision notice. In attaching this condition to the decision notice, the development will not prejudice the potential future redevelopment of the adjoining site and thereby complies with London Plan Policy D13.

SUSTAINABLE DEVELOPMENT IMPLICATIONS

Energy

256. Policy SI2 of the London Plan requires major developments to provide an assessment of their energy demands and to demonstrate that they have taken steps to apply the Mayor's energy hierarchy. Policy SI3 require consideration of decentralised energy networks, Policy SI4 deals with managing heat risk and Policy SI5 is concerned with protecting and conserving water resources and associated infrastructure.
257. Policy P70 of the Southwark Plan sets out the borough approach to ensuring that new developments tackle climate change. The approach is generally consistent with London Plan Policies but also requires new commercial developments to meet BREEAM 'Excellent'. The policy also states that residential developments must reduce carbon emissions on site (100% on 2013 Building Regulations). Southwark Council's carbon offset cost is £95 for every tonne of carbon dioxide emitted per year over a period of 30 years. This is the equivalent of £2,850 per tonne of annual residual carbon dioxide emissions.
258. An Energy Assessment and Sustainability Strategy based on the GLA energy hierarchy has been submitted by the applicant. This details how the targets for carbon dioxide emissions reduction are to be met. A combination of 'Be Lean' 'Be Clean' and 'Be Green' measures have been employed in an attempt to achieve the reduction in line with the GLA guidance on preparing energy statements, Southwark Plan Policy P70, and the Southwark Sustainable Design and Construction SPD.

Be Lean (use less energy)

259. For this stage the proposed development achieves a 29% reduction below the baseline site-wide. This represents a 35% reduction for domestic areas and a 15% reduction for the non-domestic areas using SAP10. The London Plan target for a 10% reduction from Be Lean measures has therefore been achieved for the domestic areas.
260. The Non-domestic areas exceed the London Plan Be Lean target of 15%. This is due to the large thermal envelope and the impact of energy efficient lighting, which represents a large proportion of the energy demand for these areas.

Be Clean (supply energy efficiently)

261. Having minimised the demand for energy, the energy systems have been selected in accordance with the hierarchy for selection:
 - I. Connect to an existing decentralised energy network; then
 - II. Be future-proofed to connect to a planned decentralised energy network; or
 - III. Implement a site-wide low carbon communal heating system; and
 - IV. Explore and evaluate the potential to oversize the communal heating system for connection and supply to adjacent sites and, where feasible be implemented.
262. The SELCHP DHN is operated by Veolia, and preliminary discussions have taken place with the applicant, and are ongoing with the operators about the potential to connect to this network, with Veolia confirming that Ilderton Road is an area where a plan to install a DHN in the coming years. The strategy for the development is therefore to connect to this DHN.
263. In the interim, a strategy has been proposed that incorporates a communal Air Source Heat Pump (ASHP) system into the development. The heat load profile of the residential units is favourable, and in the short term this site-wide low carbon communal heating system will provide the best carbon savings over a purely gas boiler system. Furthermore, the communal ASHP system will be future proofed in order to connect to the SELCHP network when it is available.
264. The proposed communal ASHP heating system, supplying both space heating and domestic hot water supply to all units, produces a 37% carbon reduction for the Domestic assessment and a 1% reduction for the Non-domestic areas, resulting in an overall site-wide carbon reduction of 35% at the Be Clean stage. It is noted that once connect to the SELCHP DHN is enabled, the carbon reduction savings will substantially increase.

Be Green (Low or Carbon Zero Energy)

265. The current proposal for the development is to maximise available roof space for the provision of solar Photovoltaics (PV). There is limited roof space due to the massing of the building, with a small footprint relative to the building height, however, space

has been identified for solar PV provision. It is expected that a c. 16.3 kWp array could be mounted when considering shading and access between panels. The specified solar PV panels would be highly efficient market leading solar panels.

266. It is proposed that a VRF/ASHP system will function as the primary means of providing heat energy for space heating plus cooling energy for summertime comfort cooling needs for the commercial spaces. In addition to the carbon savings delivered by such a system, this proposal also has the advantage of a single system providing both heating & cooling, with benefits in terms of cost and space. The VRF/ASHP type system proposed also produces no at-source emissions, which benefits air quality in the local environment.
267. The proposed implementation of low and zero carbon technologies, a combination of solar PV serving the units, and a VRF/ASHP system for the commercial spaces, provides an overall site-wide carbon reduction of 2% - comprised of a 2% carbon reduction for the Domestic areas, and a 5% carbon reduction for the Non-domestic areas.

Energy conclusion

268. The development adheres to the energy hierarchy, heating hierarchy and cooling hierarchy. The systems specified represent the best available for the development to save carbon while future proofing to allow connection to the proposed SELCHP DHN, should this become possible in the future. The PV system is the largest that the roof can accommodate. The development will further achieve 'zero carbon' through an offset payment in line with the London Plan and Southwark guidance. Overall carbon savings over the notional Part L baseline represents a 66% carbon reduction, well in exceedance of the 35% and 40% minimum reduction mandated by the GLA and Southwark, respectively.
269. As the development is unable to achieve the full 'Zero Carbon' target on site a contribution to the Borough's carbon offset fund will be required. The domestic elements carbon shortfall per annum amounts to £155,053, with the non-domestic element of the scheme resulting in a shortfall contribution of £28,539. The overall contribution to be secured in the S106 Agreement is £183,592. The S106 Agreement will also include the obligation of requiring the development to be constructed in accordance with the Energy and Sustainability Statement submitted with this application.

Overheating

270. London Plan Policy SI4 and Policy P68 of the NSP set out the cooling hierarchy that should be followed when developing a cooling strategy for new buildings. The six-step hierarchy is as follows:
 - Minimise internal heat generation through energy efficient design; then
 - Reduce the amount of heat entering the building through the orientation, shading, albedo, fenestration, insulation and green roofs and walls; then
 - Manage the heat within the building through exposed internal thermal mass and high ceilings; then

- Use passive ventilation; then
 - Use mechanical ventilation; then
 - Use active cooling systems (ensuring they are the lowest carbon options).
271. A revised Dynamic Overheating Assessment has been submitted along with this application which details the methodology and findings units and commercial areas within the proposed development undertaken in line with the current London Plan (2021) Policy SI4 Managing Heat Risk. Units have been selected for the overheating assessment based on design characteristics that establish them as representative of the overall proposed scheme. This selection of units includes consideration of varying floors and of different orientations.
272. All units within the development will utilise openable windows as the primary means of ventilation, with a background mechanical ventilation system. Passive measures such as; high energy efficiency, solar controls glazing, and external shading in form of balconies have been explored and adopted as far as practicable to avoid the need for comfort cooling. The performance of the units has been assessed against CIBSE TM59: Design Methodology for the Assessment of Overheating Risk in Homes, and CIBSE TM52 the limits of thermal comfort: avoiding overheating in European buildings.
273. This assessment of units and commercial areas demonstrates that an acceptable overheating risk is achieved. All units tested, demonstrate an acceptable risk of overheating. The results are based on some key design features that follow the London Plan cooling hierarchy. Additionally, representative communal corridors (with and without external openings) have been modelled and demonstrated to pass with mechanical extract.
274. Commercial areas have been shown to fail the CIBSE TM52 criteria following passive design measures, including improved solar control glazing. This is due in part to the necessarily large display windows and opening profiles which are integral to customer access, thus reducing the capacity for natural ventilation and night time purging. As a result, the assessment recommends that active cooling be specified for these areas in order to mitigate overheating. The results confirm that active cooling complies with the CIBSE TM52 criteria. For the residential element, the council's EPT officer has recommended a condition is attached to the decision notice to ensure integral blinds are provided as part of the base construction.

Whole life cycle and carbon capture

275. London Plan Policy SI2 requires a calculation of whole life cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment (WLCA). This captures a development's unregulated emissions, its embodied emissions and the carbon impact of mid-life maintenance and end- of-life dismantling.
276. The submitted WCLA follows the guidance outlined in EN 1578:2011. Calculations have been provided via One Click LCA's 'LCA for BREEAM UK' Tool. The purpose of the BREEAM tool is to evaluate the whole life cycle carbon emissions of the development and make design decisions based on carbon data in order to reduce the life cycle carbon emissions of the building.

277. The results show that Structure, including such materials as concrete and reinforcement) are the biggest contributors to the building whole life global warming score, cumulatively contributing to 62.7% of the total buildings carbon emissions. Actions that have been identified within the WCLA to help reduce the impact of the development in each of the life cycle stages are encouraging.
278. A condition is attached to the decision notice regarding an updated Whole Life-Cycle (WLC) Carbon Assessment demonstrating compliance with Part F of Policy SI 2 - Minimising greenhouse gas emissions of the London Plan 2021. The final wording of the condition will be agreed with the GLA during the Stage 2 process post committee.

Table: WLCA Emission Results compared to GLA benchmarks

	Original Global warming/GIA (kg CO2e)	Proposed Global warming/GIA (kg CO2e)	WLC Benchmark	Aspirational benchmark
A	855	532	750 – 850	450 – 500
B & C (excluding B6 & B7)	394	231	300 – 400	180 – 240

Circular economy statement

279. Policy GG5 of the London Plan 2021 promotes the benefits of transitioning to a circular economy as part of the aim for London to be a zero-carbon city by 2050. Policy D3 requires the principles of the circular economy to be taken into account in the design of development proposals in line with the circular economy hierarchy. Policy SI7 requires referable applications to develop circular economy statements.
280. The submitted Circular Economy Statement demonstrates the sustainability measures incorporated into the design of the development, and outlines the adoption of circular economy principles throughout the design, construction and operation of the proposed development. Through the incorporation of fundamental sustainability principles, the proposed development will:
- Minimise the quantities of materials used;
 - Minimise the quantities of other resources used;
 - Specify and source materials and other resources responsibly and sustainably;
 - Minimise the quantities of materials used;
 - Minimise the quantities of other resources used;
 - Specify and source materials and other resources responsibly and sustainably;
 - Manage demolition waste
 - Manage excavation waste
 - Manage construction waste
 - Manage municipal waste
281. A planning condition requiring a Circular Economy Statement to be agreed in writing by the Council prior to commencement of any works on site. Additionally, a special condition is to be imposed on the decision notice that requires a post completion circular economy report no later than three months following substantial completion of the final residential unit. This report will set out the predicted and actual performance against all numerical targets in the relevant Planning Stage Circular Economy

Statement shall be submitted to and approved in writing by the Local Planning Authority.

282. A post construction monitoring report is also secured by condition and this is included on the draft decision notice.

BREEAM

283. Southwark Plan Policy P69 requires developments to achieve a BREEAM rating of 'Excellent' for non-residential development and non-self-contained residential development over 500sqm. A Pre-Assessment BREEAM has been undertaken to establish a shell and core fit out to the commercial areas only, located on the Lower Ground level and Mezzanine level occupying 987.3sqm (GIA) / 1074sqm (GEA). The pre-assessment has considered the existing nature of the development site, along with the current development proposals and proposed building layout and demonstrated that the development being able to potentially achieve the minimum standards of the targeted 'Excellent' rating of 70.94%.
284. A planning condition is recommended to secure an independently verified BREEAM report demonstrating that these target ratings would be achieved through the detailed and technical design stages.

Water efficiency

285. For the residential aspect of the development, the applicant's Energy Assessment and Sustainability Strategy confirms that the dwellings would have a maximum indoor water consumption of 105 litres per person per day, in line with the optional standard in Part G of the Building Regulations. This will be achieved through the incorporation of low flow fixtures and fitting within the commercial and residential parts of the development to ensure water usage is minimised as possible. Therefore the development complies with Policy SI5 of the London Plan 2021.

Digital connectivity infrastructure

286. The NPPF recognises the need to support high-quality communications infrastructure for sustainable economic growth and to enhance the provision of local community facilities and services. To ensure London's long-term global competitiveness, Policy SI6 (Digital Connectivity Infrastructure) of the London Plan 2021 requires development proposals to:
- be equipped with sufficient ducting space for full fibre connectivity infrastructure;
 - achieve internet speeds of 1GB/s for all end users, through full fibre connectivity or an equivalent.
 - meet expected demand for mobile connectivity; and
 - avoid reducing mobile capacity in the local area.
287. A condition is attached to the decision notice that requires detailed plans to be submitted to and approved in writing by the Local Planning Authority demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within

the development. This is in line with the requirements of Policy SI6 of the London Plan 2021.

Health impact assessment

288. The London Plan Policy GG3 details the matters which much be considered for planning and developments to improve Londoners' health and reduce health inequalities. Additional policies which consider the health and wellbeing of Londoners include policy's GG1, D5, S1 and S2.
289. Policy P45 'Healthy developments' of the Southwark Plan states that development must:
1. Be easily accessible from the walking and cycling network; and
 2. Provide, or support opportunities for healthy activities; and
 3. Retain or re-provide existing health, community, sport and leisure facilities.
290. A Health Impact Assessment (HIA) has been submitted by HGH Consulting with the application. The HIA demonstrates that, of the 51 criteria considered by the London Healthy Urban Development Unit, the proposed development will have a positive impact on 36 and a neutral impact on 15. No negative impacts have been identified within the submitted report. It is therefore considered that the proposed development will have an overall positive impact on human health.

PLANNING OBLIGATIONS (Section 106 Undertaking or Agreement)

291. London Plan Policy DF1 and Southwark Plan Policy IP3 advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. These policies are reinforced by the Section 106 Planning Obligations 2015 SPD, which sets out in detail the type of development that qualifies for planning obligations. The NPPF echoes the Community Infrastructure Levy Regulation 122 which requires obligations to be:
- necessary to make the development acceptable in planning terms;
 - directly related to the development; and
 - fairly and reasonably related in scale and kind to the development
292. 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.
293. The application would be supported by the following Section 106 obligations:

Table: Section 106 Financial Obligations

Planning obligation	Mitigation	Applicant's position
Local Economy and Workspace		
Employment and Enterprise	<p>This development would be expected to deliver 38 sustained jobs to unemployed Southwark residents, 38 short courses, and take on 9 construction industry apprentices during the construction phase, or meet the Employment and Training Contribution.</p> <p>The maximum Employment and Training Contribution is £182,600 (£163,400 against sustained jobs, £5,700 against short courses, and £13,500 against construction industry apprenticeships).</p>	Agreed
Employment skills and business	An employment, skills and business support plan is to be provided for this development.	Agreed
Affordable workspace	10% affordable workspace (applicable to the commercial unit fronting Iderton Road only) to be secured in the event Jewson leave the property	Agreed
Living wage	London living wage – best endeavours	Agreed
Housing and Viability		
Affordable housing monitoring	<ul style="list-style-type: none"> Financial contribution towards affordable housing monitoring of £8,073.35 (£135.35 per unit) 	
Affordable housing	<ul style="list-style-type: none"> 40.3% by habitable room (25.3% social rent; 15% intermediate) 	Agreed
Wheelchair Units	Secure 10.5% wheelchair housing by habitable room	Agreed
Management Plan	Management, operation and promotion strategy to be submitted and agreed prior to occupation.	Agreed
Transport and Highways		
Construction Management	<ul style="list-style-type: none"> A detailed Construction Management Plan (CMP) and a £40 per unit (£6,800) contribution 	Agreed

	<p>for Construction Management within the OKR AAP area. This is for the council to manage cumulative impacts on the highways and environment.</p>	
<p>Southwark Highways s.278</p>	<ul style="list-style-type: none"> • Repave the footways including new kerbing fronting the development on Ilderton Road, Surrey Canal Road and Rollins Street using materials in accordance with Southwark's Streetscape Design Manual (SSDM). • Construct the new vehicular entrance on Surrey Canal Road in accordance with SSDM standards. Similarly upgrade the existing vehicular entrance on Rollins Street to SSDM standards. • Detailed designs and method statements (AIP) for foundations and basement structures retaining the highway (temporary and permanent) should be submitted and approved by the Highway Authority. Please contact Anthony Davis (Anthony.Davis@southwark.gov.uk). • Provide access arrangements such as a dropped kerb construction to accommodate refuse collection etc. • Promote all necessary Traffic Regulation Orders. • Upgrade street lighting to current LBS standards Please contact George Livingstone at George.Livingstone@southwark.gov.uk for further details. Investigate the possibility of providing lamp columns mounted to the building in order to improve effective footway widths. • Any new tree pits should be constructed in accordance with SSDM standards and the Council's Tree Services team should be consulted on any new planting on or adjacent to the public highway. • Refresh road markings following kerb installation. 	<p>Agreed</p>

	Rectify any damaged footways, kerbs, inspection covers and street	
TfL Obligations	TfL requested financial obligations <ul style="list-style-type: none"> • Bus contribution of £459,000 (based on £2700 per home) • TfL Cycle Hire Docking Station Contribution of £8,500 (based on £50 per home) along with free membership 	Agreed
TfL s.278	<ul style="list-style-type: none"> • The delivery of the OKR Healthy Streets scheme via an appropriate design/layout • Carriageway works • Footway and junctions including any associated bus, walking and cycling infrastructure and other related works 	
Parking permit restriction	This development would be excluded from those eligible for car parking permits under any future CPZ operating in this locality.	Agreed
Car club membership	Three year membership to new residents to car clubs operating in the area.	Agreed
Delivery and Service Plan	DSP bond contribution of £17,019.76 (£100 per resi unit + £100 per 5,000 sqm of new commercial).	Agreed
Pavement	Public Realm and highway improvements to include footways paved with precast concrete paving slabs with 150mm wide silver grey granite natural stone kerbs.	Agreed
Intersection upgrades	A proportionate financial contribution towards a Toucan crossing on Surrey Canal Road and the provision of a crossing across the commercial entrance on Rollins Street as per the recommendations of the Road Safety Audits.	Agreed
CCTV	Funding of an enforcement camera to monitor access on Surrey Canal Road.	Agreed
Energy, Sustainability and the Environment		
Futureproofing for connection to District Heat Network (DHN)	Prior to occupation, a CHP Energy Strategy must be approved setting out how the development will be designed and built so that it will be capable of connecting to the District CHP in the future.	Agreed

Carbon	<ul style="list-style-type: none"> • An off-set payment of £183,592 • Review and re-calculation of on-site savings following detailed design stage • Be Seen Monitoring 	Agreed
Archaeology monitoring/ supervision fund	£11,171 towards Archaeological monitoring	Agreed
Open Space	£119,925 contribution towards public open spaces within the OKROA	Agreed
Other obligations		
Architects	Securing Stitch Architects to deliver the building detailed design, unless otherwise agreed in writing	Agreed
Other	<ul style="list-style-type: none"> • Unless otherwise agreed with the council, not to use any part of the development as a betting shop, pawnbrokers or pay day loan shop should Jewson leave the property • Bookable internal community room 	Agreed
Administration fee	Maximum contribution to cover the costs of monitoring these necessary planning obligations, calculated as 2% of total sum	Agreed

294. The S106 heads of terms agreed would satisfactorily mitigate against the adverse impacts of the proposed development.

295. In the event that a satisfactory legal agreement has not been entered into by 4 April 2023, it is recommended that the director of planning and growth refuses planning permission, if appropriate, for the following reason:

“The proposal, by failing to provide for appropriate planning obligations secured through the completion of a S106 agreement, fails to ensure adequate provision of affordable housing and mitigation against the adverse impacts of the development through projects or contributions that is contrary to Southwark Plan policy IP3 (‘Community Infrastructure Levy (CIL) and Section 106 Planning Obligations’), Policy DF 1 Planning Obligations of the London Plan (2021) and the Southwark Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015)”.

Mayoral and Southwark Community Infrastructure Levy (CIL)

296. 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 investments in London as a whole, primarily Crossrail, while Southwark's CIL will provide for infrastructure that supports growth in Southwark.

297. The site is located within Southwark CIL zone 2 and MCIL2 Band 2 zone. Based on the applicant's CIL Form 1 (GIA) dated 9.8.2022, the gross amount of CIL is approximately **£5,334,253.69** (pre-relief). Subject to the correct CIL forms being submitted on time, CIL Social Housing Relief can be claimed for a number of types of affordable housing. Based on Form 1, the CIL estimate is revised to **£3,283,173.16** if Social Housing Relief is successfully claimed for. It should be noted that this is an estimate, and floor areas will be checked when related CIL Assumption of Liability and Relief Claim Forms are submitted, after planning approval has been obtained.

OTHER MATTERS

298. None

COMMUNITY INVOLVEMENT AND ENGAGEMENT

299. Southwark's Draft Statement of Community Involvement and Development Consultation Charter encourages consultation with local communities, especially developers seeking permission for 'Major/Large Scale' developments. The Charter is a guide setting out the consultation requirements to be carried out by developers for proposed development.
300. A Statement of Community Involvement has been submitted along with the application. It is noted that during the time frame of this application from the first pre-app meeting with Southwark Council in April 2020, that the ability to hold public forums with respect to consultation was severely limited due to the Covid-19 pandemic.
301. It was advised during pre-app discussions with Southwark officers that the most effective way to receive feedback from the local community regarding the development would be in the form of a website consultation page.
302. With the advice of Southwark officers, an online public consultation was held in summer 2020. This was well advertised on the Old Kent Road regeneration website that is regularly updated and maintained by Southwark. The scheme was communicated to visitors by a narrated video showing visualisations and diagrams of the developing proposal. Further public consultation was also held on an independent online website where the public was invited to view and comment on the scheme.
303. As stated previously in this report, the proposals were subject to two rounds of scrutiny at the Design Review Panel, and was also scrutinised by members of the Southwark Community Review Panel. Given the above, it is considered that due to the extenuating circumstances of the Covid-19 pandemic, the efforts to source public feedback on the development proposals was acceptable in meeting the aims and objectives of Southwark's Draft Statement of Community Involvement and Development Consultation Charter

Human rights implications

304. 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.
305. This application has the legitimate aim of delivering a mixed-use development. 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.

CONCLUSION ON PLANNING ISSUES

306. The development will re-provide an existing business on an improved floorspace along with 170 residential homes. 61 of the new homes will be affordable, equating 40.3% by habitable rooms. This is a significantly positive aspect of the scheme.
307. All residential units have access to large private amenity spaces in the form of balconies or winter gardens. The scheme also benefits from two communal amenity spaces which meets all requirements for communal and children's playspace on site, with the communal amenity spaces being accessible to all residents within the development.
308. The quality of the proposed residential accommodation is considered to be positive, meeting or exceeding the minimum space standards and providing 58.24% dual aspect accommodation. The proposal also provides a range of housing choices from one to four-bedroom properties, including 20.6% family homes (including 14 four-bedroom homes within the social rent), and 10.5% wheelchair housing by habitable room.
309. The development will achieve 66% on-site carbon emissions, with the deficit being captured by way of a financial contribution. In addition, the proposal involves the loss of four trees (two Category B and two Category C trees), albeit 21 new trees with greater variety, as well as physical and visual value are proposed, with conditions to secure adequate replacement and protection measures.
310. The proposed development would reduce car dependency whilst significantly increasing cycle provision within the development. The increased width of the public footway along both frontages is anticipated to significantly enhance the public realm and improve the pedestrian experience through comfort and circulation when entering, visiting or moving past the site.
311. The impacts of the scheme on neighbouring properties in relation to daylight and sunlight would not result in detrimental harm to the living conditions of neighbouring occupiers. Furthermore, in many cases, where the results would not satisfy the BRE Guidelines, the retained levels would be within the range considered acceptable for an urban location.

312. The proposed development would be of a high quality of architecture, and is considered to enhance the existing appearance of the subject site whilst referencing the surrounding context. The design has ensured that there would be depth and articulation to facades of the development.
313. It is therefore recommended that planning permission be granted subject to conditions, referral to the Mayor of London, and the agreement of a Section 106 Legal Agreement under the terms as set out above.

Consultation responses from external and statutory consultees

314. This application was subject to a round of statutory consultation in January/February 2022.
315. Greater London Authority have made the following comments:
- The redevelopment of the Jewson builders merchant site is strongly supported in land-use terms in accordance Policies E4, E6, E7, H1 and Objective GG2 of the London Plan 2021
 - The scheme is proposing 40.3% affordable housing with a tenure mix of 63% social rent and 27% London shared ownership and would qualify for the Fast Track Route, subject to the Council's acceptance of the tenure mix and the applicant demonstrating engagement with a registered provider and consideration of grant funding.
 - No harm would be caused to the nearby heritage assets; height, massing and layout are generally supported and given the site's location within an area identified for tall buildings in the local plan the application generally complies with London Plan Policy D9.
 - The applicant is required to continue discussions with TfL and Southwark on Healthy Streets and with Southwark regarding the ATZ assessment; cycle parking should be amended to accord with LCDS; and contributions towards improvements to the bus network and expansion of the TfL cycle hire scheme appropriately secured, as well as the various transport-related plans highlighted in this report.
 - Additional information on the energy strategy, WLC assessment and circular economy statement is required as detailed in the technical memos provided to the applicant; and post-construction monitoring and a carbon off-set contribution is also to be secured.

Officer comment: Conditions for cycle parking in accordance with LCDS standards, and conditions regarding WLC, CES and Energy have been secured by condition. Notwithstanding this, negotiations will continue with the GLA at the Stage 2 process post planning committee.

316. Transport for London have made the following comments:

The applicant will be expected to enter in to a S278 agreement (covering carriageway, footway and junctions including any associated bus, walking and cycling infrastructure and other related works) to deliver improvements to the pedestrian, cycling and public transport environment in accordance with the Healthy Streets scheme being developed. TfL will provide a map showing the area

to be covered by the S278 and the wording that should accompany this map in a separate e-mail.

- A contribution of £2,700 per residential unit is sought towards improvements to the bus network in accordance with Policy T4 of the London Plan. This is in line with the agreement for all other sites in the OKR area. A Section 106 contribution of £985,000, calculated on a pro-rata basis, will also be sought towards the delivery of a new London Overground station, known as 'Surrey Canal', and works to support frequency improvements along East London Line in line with Policy T4. The new station will bring rail travel within easy reach of occupiers and visitors to this development, including those with mobility needs as it will have step free access, and the frequency increase on the Clapham Junction branch to 6 trips per hour, rather than 4, would increase capacity significantly.
- It is proposed that the non-residential element would be accessed via Rollins Street and the residential element via a new vehicular access on Surrey Canal Road. The applicant should justify why the existing access from Rollins Road cannot be used for both the residential and non-residential uses, as well as demonstrate how this proposed vehicle access would support the planned improvements for this junction that are aimed at enabling bus services to run along Surrey Canal Road.
- A total of 322 long-stay and 6 short-stay cycle parking spaces for the residential element are to be provided, along with 8 long-stay and 4 short-stay for the commercial element. This quantum accords with the minimum standards in terms of quantity as set out London Plan Policy T5; however, the proposals do not meet the required quality in accordance with London Cycle Design Standards (LCDS) and should be addressed prior to the Mayor's final determination of the application to ensure full compliance with Policy T5. As proposed, it would appear that a large part of the route between Block A and the cycle parking requires use of the public footway and even for Block B the route is convoluted.
- Regarding disabled persons' parking, 2 spaces are proposed for the residential element. This is equivalent to 1% of residential dwellings having access to a disabled person parking space at the outset, whereas London Plan Policy T6.1 states that proportion should be 3% and the identification of additional spaces for disabled people equivalent to another 7% of homes should demand arise. To address this, the general car parking being proposed for the non-residential element could instead be used to provide additional disabled persons' parking provision. For non-compliant disabled persons' parking provision to be considered acceptable, the suitability of the routes to key trip attractors for pedestrians from all walks of life should be demonstrated. It should also be demonstrated that spaces have been identified, and agreed with the Council, for suitable on-street provision should demand rise. Additionally, a range of good step-free alternatives to the use of a car for disabled persons must be secured and Section 106 contributions to mitigate any shortfall in car parking for disabled people.
- A parking design and management plan should be secured to ensure that parking is used only by disabled people and allocation is on the basis of need and not tied to particular homes or jobs. The applicant is encouraged to provide active electric vehicle charging facilities for all parking, including on-street spaces.
- A robust assessment of delivery and servicing demand for this development should be undertaken, as there is a concern that this is currently being underestimated. A full delivery and servicing plan should be secured through condition. The applicant is encouraged to consider the introduction of sustainable freight facilities, such as cargo bike loading areas and charging for electric or hybrid service vehicles. A full

construction logistics plan should also be secured by condition. This should be prepared in line with TfL guidance and provide details on how the impacts on the surrounding transport network would be minimised and adherence to Vision Zero.

Officer response: The comments from TfL are noted. In respect of the s278, LBS are the highways authority for the road adjacent to the site and will determine the extent of the s278 agreement. Conditions relating to cycle parking and delivery and servicing plans have been secured in the decision notice attached, along with the requirement of ECV's and the S106 Agreement will have an obligation where no resident will be able to apply for a parking permit.

Officers do not agree with TfL that the development needs to provide a payment to the delivery of the New Bermondsey Overground Station located in the London Borough of Lewisham. When the OKROA was outlined an agreement was in place whereby new residential development within Southwark would contribute £2,700 per residential unit towards the improvement of bus services in the area through S106 payments. The draft AAP also identifies the Community Infrastructure Levy payments will contribute to the delivery of the BLE. These remain the councils agreed priorities. In addition in respect of the phasing of OKRD TfL have confirmed that they do not consider that the presence of the existing South Bermondsey station or the proposed New Bermondsey station would justify changing the calculation of the phasing in the OKRD AAP. As no agreement was put in place to fund the New Bermondsey Overground Station development in the councils draft OKRD AAP this contribution will not be sought for the S106 Agreement.

317. Metropolitan Police: Comments made.

I can confirm that I have held a meeting with the design team dealing with this development at which the principles of Secured by Design were discussed. It is encouraging to see that the designers have considered Secured by Design, and I believe that this will result in a positive impact upon the development from a safety and security perspective. Continued liaison with a designing out crime officer will enhance this.

The design of the development has considered opportunity for natural surveillance, incorporates excellent lines of site and the development should 'activate' this area. These are all excellent crime prevention measures.

The ground floor footprint has also been designed in such a way that there are no alcoves or secluded areas that are often crime and ASB generators. This, again, is extremely positive in relation to crime prevention.

Lighting within the schemes public realm areas should conform to lighting standard BS 5489:2103. This lighting standard is particularly important in regard to preventing offences of violence against women and girls. Good levels of light are known to assist in preventing this type of offending as well as giving confidence to persons using the spaces in the hours of darkness.

The proposal includes a service/parking yard for the use of Jewson customers. There is an increase in theft of and from works vans, with tools and materials regularly being targeted. This yard, therefore, should be lit to the public realm standard detailed earlier and should be provided with full CCTV coverage. To assist with securing the yard at night, the car park should be gated and locked each evening. The height of these gates and boundary should be a minimum of 2.2m in height and care should be taken in designing them to ensure there are no climbing aids to assist potential offenders.

There is also a bulk storage area shown within the yard. This is a potential target for large scale theft and should be appropriately secured with a robust boundary, gates and CCTV coverage. The details of this can be discussed as the design progresses.

Officer response: The requested condition has been included on the draft decision notice and it is expected that the outstanding design measures requested by the Secured by Design officer will be submitted as part of the condition discharge.

318. London Fire Brigade: No further observations.

The London Fire Commissioner (the Commissioner) is the fire and rescue authority for London. The Commissioner is responsible for enforcing the Regulatory Reform (Fire Safety) Order 2005 (The Order) in London.

The London Fire Brigade (LFB) has been consulted with regard to the above-mentioned premises and have no further observations to make. It should be ensured that if any material amendments to this consultation is proposed, a further consultation may be required.

Officer comment: Noted

319. Health and Safety Executive: No response to consultation request.

320. Historic England (HE):

Historic England confirmed they do not have any comments to make on this development

Officer comment: Noted

321. Natural England: No comments.

Officer response: Noted.

322. Environment Agency

We have **no objection** to the planning application as submitted, **subject to the following conditions** being imposed on any planning permission granted. Without these conditions, the proposed development on this site poses an unacceptable risk to the environment and we would wish to object to the planning application.

Officer comment: Recommended conditions and informatives are attached to the decision notice accompanying this report.

323. Arqiva: No response provided by Arqiva from consultation request.

324. Thames Water: On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommends the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

Officer comment: Comments noted and recommended informative attached to the accompanying decision notice.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

325. None.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Southwark Local Development Framework and Development Plan Documents	Place and Wellbeing Department 160 Tooley Street London, SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.go.uk Case officer telephone: 0207 525 1513 Council website: www.southwark.gov.uk

APPENDICES

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

AUDIT TRAIL

Lead Officer	Stephen Platts, Director of Planning and Growth	
Report Author	Troy Davies, Team Leader	
Version	Final	
Dated	20 September 2022	
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
Date final report sent to Constitutional Team		21 September 2022

RECOMMENDATION

Applicant	Twenty Twenty Ilderton Wharf Limited and SGBD		
Application Type	Full Planning Application		
Recommendation	Grant subject to S106 Agreement	Case Number	21/AP/4757

Draft of Decision Notice

Planning Permission was GRANTED for the following development:

Demolition of existing buildings and erection of a mixed use development comprising a building of part 9, 23 and 25 storeys above ground to provide a replacement builders merchants with associated office, trade counter sales area , showroom and external storage/racking, a commercial unit fronting Ilderton Road (Use Class E) 170 residential apartments (Use Class C3) and other associated infrastructure.

At: ILBERTON WHARF, 1-7 ROLLINS STREET, SE15, 1EP

In accordance with application received on 30/12/2021

1 Approved Plans

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

20210-STCH-XX-ZZ-DR-A-1003 EXISTING SITE ELEVATION

20210-STCH-XX-ZZ-DR-A-1004 EXISTING SITE ELEVATION

20210-STCH-XX-ZZ-DR-A-1005 EXISTING SITE SECTION AA AND BB

20210-STCH-XX-ZZ-DR-A-1006 EXISTING PLAN AND ELEVATIONS

20210-STCH-XX-ZZ-DR-A-1007 EXISTING PLAN AND ELEVATIONS

20210-STCH-XX-RF-DR-A-1050 REV P04 PROPOSED SITE PLAN – LOWER GROUND FLOOR

20210-STCH-XX-RF-DR-A-1051 REV P03 PROPOSED SITE PLAN – ROOF PLAN

20210-STCH-XX-00-DR-A-1052 REV P02 PROPOSED SITE PLAN – BOUNDARY TREATMENTS

20210-STCH-XX-00-DR-A-1100 REV P03 PROPOSED LOWER GROUND FLOOR PLAN

20210-STCH-XX-0U-DR-A-1101 REV P02 PROPOSED UPPER GROUND PLAN

20210-STCH-XX-01-DR-A-1102 REV P02 PROPOSED FIRST FLOOR PLAN

20210-STCH-XX-02-DR-A-1103 REV P02 PROPOSED SECOND FLOOR PLAN

20210-STCH-XX-03-DR-A-1104 REV P02 PROPOSED THIRD FLOOR PLAN

20210-STCH-XX-04-DR-A-1105 REV P02 PROPOSED FOURTH FLOOR PLAN

20210-STCH-XX-05-DR-A-1106 REV P02 PROPOSED FIFTH FLOOR PLAN

20210-STCH-XX-06-DR-A-1107 REV P02 PROPOSED SIXTH FLOOR PLAN

20210-STCH-XX-07-DR-A-1108 REV P02 PROPOSED SEVENTH FLOOR PLAN
20210-STCH-XX-08-DR-A-1109 REV P01 PROPOSED EIGHTH FLOOR PLAN
20210-STCH-XX-09-DR-A-1110 REV P01 PROPOSED NINTH FLOOR PLAN
20210-STCH-XX-10-DR-A-1111 REV P01 PROPOSED TENTH FLOOR PLAN
20210-STCH-XX-11-DR-A-1112 REV P01 PROPOSED ELEVENTH FLOOR
20210-STCH-XX-12-DR-A-1113 REV P01 PROPOSED TWELFTH FLOOR PLAN
20210-STCH-XX-13-DR-A-1114 REV P01 PROPOSED THIRTEENTH FLOOR PLAN
20210-STCH-XX-14-DR-A-1115 REV P01 PROPOSED FOURTEENTH FLOOR PLAN
20210-STCH-XX-15-DR-A-1116 REV P01 PROPOSED FIFTEENTH FLOOR PLAN
20210-STCH-XX-16-DR-A-1117 REV P01 PROPOSED SIXTEENTH FLOOR PLAN
20210-STCH-XX-17-DR-A-1118 REV P01 PROPOSED SEVENTEENTH FLOOR PLAN
20210-STCH-XX-18-DR-A-1119 REV P01 PROPOSED EIGHTEENTH FLOOR PLAN
20210-STCH-XX-19-DR-A-1120 REV P01 PROPOSED NINETEENTH FLOOR PLAN
20210-STCH-XX-20-DR-A-1121 REV P01 PROPOSED TWENTIETH FLOOR PLAN
20210-STCH-XX-21-DR-A-1122 REV P01 PROPOSED TWENTY FIRST FLOOR PLAN
20210-STCH-XX-22-DR-A-1123 REV P01 PROPOSED TWENTY SECOND FLOOR PLAN
20210-STCH-XX-23-DR-A-1124 REV P01 PROPOSED TWENTY THIRD FLOOR PLAN
20210-STCH-XX-24-DR-A-1125 REV P01 PROPOSED ROOF LEVEL PLAN
20210-STCH-XX-24-DR-A-1125 REV P01 PROPOSED ROOF LEVEL PLAN
20210-STCH-XX-24-DR-A-1126 REV P01 PROPOSED ROOF PLAN

20210-STCH-XX-ZZ-DR-A-1200 REV P01 PROPOSED NORTH ELEVATION
20210-STCH-XX-ZZ-DR-A-1201 REV P01 PROPOSED EAST ELEVATION
20210-STCH-XX-ZZ-DR-A-1202 REV P02 PROPOSED SOUTH ELEVATION
20210-STCH-XX-ZZ-DR-A-1203 REV P02 PROPOSED WEST ELEVATION
20210-STCH-XX-ZZ-DR-A-1204 REV P01 PROPOSED SITE ELEVATION – WEST
20210-STCH-XX-ZZ-DR-A-1205 REV P01 PROPOSED SITE ELEVATION – NORTH

20210-STCH-XX-ZZ-DR-A-1300 REV P01 PROPOSED BUILDING SECTION AA
20210-STCH-XX-ZZ-DR-A-1301 REV P01 PROPOSED BUILDING SECTION BB
20210-STCH-XX-ZZ-DR-A-1302 REV P01 PROPOSED BUILDING SECTION CC
20210-STCH-XX-ZZ-DR-A-1303 REV P01 PROPOSED BUILDING SECTION DD
20210-STCH-XX-ZZ-DR-A-1304 REV P01 PROPOSED BUILDING SECTION EE
20210-STCH-XX-ZZ-DR-A-1305 REV P01 PROPOSED BUILDING SECTION FF

Reason:

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

Permission is subject to the following Time Limits:

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

Reason:

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

Pre-commencement condition(s) - the details required to be submitted for approval by the condition(s) listed below must be submitted to and approved by the council before any work in connection with implementing this permission is commenced.

3 **Archaeological Evaluation**

Before any work hereby authorised begins (excluding demolition to slab level and necessary site investigation works), the applicant shall secure the implementation of a programme of archaeological evaluation works in accordance with a written scheme of investigation which shall be submitted to and approved in writing by the Local Planning Authority.

Reason:

In order that the applicants supply the necessary archaeological information to ensure suitable mitigation measures and/or foundation design proposals be presented in accordance with Policy P23 Archaeology of the Southwark Plan (2022) and the National Planning Policy Framework 2021.

4 **Archaeological Mitigation**

Before any work hereby authorised begins (excluding site investigation works, demolition to slab level and archaeological evaluation works), the applicant shall secure the implementation of a programme of archaeological mitigation works in accordance with a written scheme of investigation, which shall be submitted to and approved in writing by the Local Planning Authority.

Reason:

In order that the details of the programme of works for the archaeological mitigation are suitable with regard to the impacts of the proposed development and the nature and extent of archaeological remains on site in accordance with Policy P23 Archaeology of the Southwark Plan (2022) and the National Planning Policy Framework 2021.

5 **Archaeological Foundation Design**

Before any work, hereby authorised begins (excluding demolition to basement level, archaeological evaluation and mitigation and site investigation works), the applicant shall submit a detailed scheme showing the complete scope and arrangement of the basement and foundation design, and all associated subterranean groundworks, including the construction methods. The submitted documents should show how archaeological remains will be protected by a suitable mitigation strategy. The detailed scheme will need to be approved in writing by the Local Planning Authority and the development shall only be carried out in accordance with the approval given.

Reason:

In order that all below ground impacts of the proposed development are known and an appropriate protection and mitigation strategy is achieved to preserve archaeological remains by

record and/or in situ in accordance with Policy P23 Archaeology of the Southwark Plan (2022) and the National Planning Policy Framework 2021.

6 **Construction Environmental Management Plan (CEMP)**

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

A detailed specification of demolition and construction works at each phase of development including consideration of all environmental impacts and the identified remedial measures;

Site perimeter continuous automated noise, dust and vibration monitoring;

Engineering measures to eliminate or mitigate identified environmental impacts e.g. hoarding height and density, acoustic screening, sound insulation, dust control measures, emission reduction measures, location of specific activities on site, etc.;

Arrangements for a direct and responsive site management contact for nearby occupiers during demolition and/or construction (signage on hoardings, newsletters, residents liaison meetings, etc.)

A commitment to adopt and implement of the ICE Demolition Protocol and Considerate Contractor Scheme; Site traffic - Routing of in-bound and outbound site traffic, one-way site traffic arrangements on site, location of lay off areas, etc.;

Site waste Management - Accurate waste stream identification, separation, storage, registered waste carriers for transportation and disposal at appropriate destinations.

A commitment that all NRMM equipment (37 kW and 560 kW) shall be registered on the NRMM register and meets the standard as stipulated by the Mayor of London

To follow current best construction practice, including the following:-

Southwark Council's Technical Guide for Demolition & Construction at <http://www.southwark.gov.uk/construction>

Section 61 of Control of Pollution Act 1974,

The London Mayors Supplementary Planning Guidance 'The Control of Dust and Emissions During Construction and Demolition',

The Institute of Air Quality Management's 'Guidance on the Assessment of Dust from Demolition and Construction' and 'Guidance on Air Quality Monitoring in the Vicinity of Demolition and Construction Sites',

BS 5228-1:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites. Noise',

BS 5228-2:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites. Vibration'

BS 7385-2:1993 Evaluation and measurement for vibration in buildings. Guide to damage levels from ground-borne vibration,

BS 6472-1:2008 'Guide to evaluation of human exposure to vibration in buildings - vibration sources other than blasting,

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

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

Reason

To ensure that occupiers of neighbouring premises and the wider environment do not suffer a loss of amenity by reason of pollution and nuisance, in accordance with Policy P56 'Protection of amenity' of the Southwark Plan (2022), and the National Planning Policy Framework (2021).

7 **Site Contamination**

Prior to the commencement of any development, excluding demolition and site clearance:

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

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

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

Reason:

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

8 **Drainage**

No works (excluding demolition and site clearance) shall commence until full details of the proposed surface water drainage system incorporating Sustainable Drainage Systems (SuDS) have been submitted to and approved in writing by the Local Planning Authority, including detailed design, size and location of attenuation units and details of flow control measures. The strategy should achieve a reduction in surface water runoff rates during the 1% Annual Exceedance Probability (AEP) event plus climate change allowance, as detailed in the Sustainable Drainage Statement prepared by BWB (ref: JIR-BWB-ZZ-XX-RP-CD-0001_SDS-S2-P05, dated March 2022). The applicant must demonstrate that the site is safe in the event of blockage/failure of the system, including consideration of exceedance flows.

Reason:

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

9 **Access for Fire Appliances**

Details of access for fire appliances as required by part 5B of the Building Regulations and details of adequate water supplies for fire-fighting purposes should be provided prior to the implementation of the development (excluding demolition and site clearance) and should be secured in perpetuity on completion of the development.

Reason:

To meet the requirements for fire safety set out in policy D12 of the London Plan 2021

10 **Circular Economy Statement**

Prior to the commencement of development, including demolition, an updated Circular Economy Statement demonstrating compliance with Part B of Policy SI 7 'Reducing waste and supporting the circular economy' of the London Plan 2021 and including measures for monitoring and reporting against the targets within the Circular Economy Statement shall be submitted and approved in writing by the Local planning Authority. The assessment shall develop a strategy for the implementation of circular economy principles in both the approved building's and wider site's operational phase, in addition to developing an end-of-life strategy for the development according to circular economy principles, including disassembly and deconstruction.

Reason:

To promote resource conservation, waste reduction, material re-use, recycling and reduction in material being sent to land fill in compliance with Policy SI 7 of the London plan 2021.

11 **Piling Risk Assessment**

Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated by a piling risk assessment that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason:

To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants in line with paragraph 174 of the National Planning Policy Framework.

12 Tree Planting

Prior to works commencing (excluding demolition and site clearance), full details of all proposed tree planting (totalling **21 trees** unless otherwise agreed with the local planning authority) shall be submitted to and approved in writing by the Local Planning Authority. This will include tree pit cross sections, available soil volumes, planting and maintenance specifications, use of guards or other protective measures and confirmation of location, species, sizes, nursery stock type, supplier and defect period. All tree planting shall be carried out in accordance with those details and at those times.

All trees and shrubs will conform to the specification for nursery stock as set out in British Standard 3936 Parts 1 (1992) and 4 (1984). Advanced Nursery stock trees shall conform to BS 5236 and BS: 4428 Code of practice for general landscaping operations.

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

Reason:

To ensure the proposed development will preserve and enhance the visual amenities of the locality and is designed for the maximum benefit of local biodiversity, in addition to the attenuation of surface water runoff in accordance with The National Planning Policy Framework 2021 Parts 8, 11, 12, 15 and 16; Policies G1 (Green Infrastructure, G5 (Urban Greening) and G7 (Trees and Woodlands) of the London Plan 2021; and policies of The Core Strategy 2011: SP11 Open spaces and wildlife; SP12 Design and conservation; SP13 High environmental standards and the following policies of The Southwark Plan (2022): P56 Protection of Amenity, P21 Conservation of the Historic Environment and Natural Heritage, P60 Biodiversity, and P61, Trees.

13 Agent of change

Prior to commencement of construction (excluding demolition and site clearance), an acoustic assessment shall be submitted to the Local Planning Authority to assess the impact of commercial noise from surrounding commercial operations on future occupants of the development. The assessment shall be conducted in accordance with BS4142:2014+A1-2019. The assessment shall include a review of currently proposed acoustic, ventilation, and overheating mitigation measures and a scheme of further or enhanced mitigation measures as may be necessary to ensure that future occupants do not suffer significant adverse impacts, and other adverse impacts are mitigated and minimised. Once approved the mitigation measures shall be implemented in full and permanently maintained thereafter.

Reason:

To ensure that occupiers of proposed dwellings do not suffer a loss of amenity by reason of noise nuisance due to commercial noise in accordance with the National Planning Policy Framework 2021, and Policies P56 Protection of Amenity and Policy P66 Reducing noise pollution and enhancing soundscapes of the Southwark Plan (2022).

Commencement of works above grade - the details required to be submitted for approval by the condition(s) listed below must be submitted to and approved by the council before any work above grade is commenced. The term 'above grade' here means any works above ground level.

14 **Hard and Soft Landscaping**

Before any above grade work hereby authorised begins (excluding demolition and site clearance), detailed drawings of a hard and soft landscaping scheme showing the treatment of all parts of the site not covered by buildings (including cross sections, available rooting space, tree pits, surfacing materials of any parking, access, or pathways layouts, materials and edge details including buffer details to residential units abutting amenity spaces), shall be submitted to and approved in writing by the Local Planning Authority. The landscaping shall not be carried out otherwise than in accordance with any such approval given and shall be retained for the duration of the use of the building.

The planting, seeding and/or turfing shall be carried out in the first planting season following completion of building works and any trees or shrubs that is found to be dead, dying, severely damaged or diseased shall be replaced in the next planting season by specimens of the equivalent stem girth and species in the first suitable planting season. Planting shall comply to BS: 4428 Code of practice for general landscaping operations, BS: 5837 (2012) Trees in relation to demolition, design and construction and BS 7370-4:1993 Grounds maintenance Recommendations for maintenance of soft landscape (other than amenity turf).

Reason:

So that the Council may be satisfied with the details of the landscaping scheme, in accordance with: Chapters 8, 12, 15 and 16 of the National Planning Policy Framework 2021, policy D4 ('Delivering good design') of the London Plan 2021 and policies P13 ('Design of places'), P14 ('Design quality') and P59 ('Green infrastructure') of the Southwark Plan 2022.

15 **Biodiverse Roofs**

Before any biodiverse roofs are installed, details of the biodiversity (green/brown) roof(s) for that phase shall be submitted to and approved in writing by the Local Planning Authority. The biodiversity (green/brown) roof(s) shall be:

- biodiversity based with extensive substrate base (depth 80-150mm);
- laid out in accordance with agreed plans; and
- planted/seeded with an agreed mix of species within the first planting season following the practical completion of the building works (focused on wildflower planting, and no more than a maximum of 25% sedum coverage).

The biodiversity (green/brown) roof(s) shall not be used as an amenity or sitting out space of any kind whatsoever and shall only be used in the case of essential maintenance or repair, or escape

in case of emergency. The biodiversity roof(s) shall be carried out strictly in accordance with the details so approved and shall be maintained as such thereafter.

Full Discharge of this condition will be granted for each phase once the green/brown roof(s) for that phase are completed in full in accordance to the agreed plans. A post completion assessment will be required to confirm the roof has been constructed to the agreed specification.

Reason:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with: Policies SI 4 (Managing heat risk), SI 13 (Sustainable drainage), G1 (Green Infrastructure), G5 (Urban Greening) of the London Plan 2021; Policy P59 (Green Infrastructure) and Policy P60 (Biodiversity) of the Southwark Plan (2022).

16 Landscape Management Plan

Before any above grade work hereby authorised begins (excluding demolition and site clearance), a landscape management plan, including long-term design objectives, management responsibilities and maintenance schedules for all landscaped areas shall be submitted to an approved in writing by the Local Planning Authority. The landscape management plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the local planning authority.

Reason:

This condition is necessary to ensure the protection of wildlife and supporting habitat and secure opportunities for the enhancement of the nature conservation value of the site. This is a mandatory criterion of BREEAM (LE5) to monitor long term impact on biodiversity, a requirement is to produce a Landscape and Habitat Management Plan.

17 Swift Bricks/Bat Bricks

Details of swift bricks and bat tubes shall be submitted to and approved in writing by the Local Planning Authority prior to any above grade façade works of the development commencing.

No less than 24 swift bricks and 12 bat bricks shall be provided and the details shall include the exact location, specification and design of the habitats. The bricks shall be installed within the development prior to the first occupation of the building to which they form part or the first use of the space in which they are contained.

Reason:

To ensure the development provides the maximum possible provision towards creation of habitats and valuable areas for biodiversity in accordance with Chapter 15 (Conserving and enhancing the natural environment) of the National Planning Policy Framework (2021); Policy G6 (Biodiversity and access to nature) of the London Plan (2021); P56 Protection of amenity, P57 Open space, P58 Open Water space, P59 Green infrastructure, P60 Biodiversity, P66 Reducing noise pollution and enhancing soundscapes and P69 Sustainable standards of the Southwark Plan (2022).

18 **Secure By Design**

Prior to the commencement of any above grade works (excluding demolition and site clearance), details of external security measures shall be submitted and approved in writing by the Local Planning Authority and any such security measures shall be implemented prior to occupation in accordance with the approved details which shall seek to achieve the 'Secured by Design' accreditation award from the Metropolitan Police.

Reason:

In pursuance of the Local Planning Authority's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions and to improve community safety and crime prevention, in accordance with: the National Planning Policy Framework 2021 and Southwark Plan 2022 policy P16 ('Designing out crime').

19 **Materials Schedule and On-Site Presentation of Samples**

Prior to the commencement of any above grade works (excluding demolition and site clearance), samples of all external facing materials and full-scale (1:1) mock-ups of the facades to be used in the carrying out of this permission shall be presented on site to the Local Planning Authority and approved in writing. The development shall not be carried out otherwise than in accordance with any such approval given. The facades to be mocked up should be agreed with the Local Planning Authority.

Reason:

In order that the Local Planning Authority may be satisfied that these samples will make an acceptable contextual response in terms of materials to be used, and achieve a quality of design and detailing, are suitable in context and consistent with the consented scheme in accordance with: the National Planning Policy Framework 2021, policies P13 ('Design of places') and P14 ('Design quality') of the Southwark Plan 2022 and policy D4 ('Delivering good design') of the London Plan 2021.

20 **Design Mock-ups**

Prior to commencement of any works above grade (excluding demolition and site clearance), detailed drawings at a scale of 1:5 or 1:10 through:

- i) all facade variations; and
- ii) commercial fronts and residential entrances; and
- iii) all parapets and roof edges; and
- iv) all balcony details; and
- v) heads, cills and jambs of all openings

to be used in the carrying out of this permission shall be submitted to and approved by the Local Planning Authority in writing. The development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

In order that the Local Planning Authority may be satisfied as to the design and details in accordance with the NPPF 2021, policies P13 ('Design of places') and P14 ('Design quality') of the Southwark Plan 2022 and policy D4 ('Delivering good design') of the London Plan 2021.

21 **Play Spaces**

i) Before any playspaces are installed within the development hereby approved, the developer shall submit details of all the play spaces proposed, including 1:50 scale detailed drawings for approval by the Local Planning Authority. The development shall not be carried out otherwise than in accordance with any such approval given and retained as such.

ii) No later than 6 months prior to occupation of each phase, details of the play equipment to be installed within that phase shall be submitted to and approved in writing by the Local Planning Authority. The play equipment shall be provided in accordance with the details thereby approved prior to the occupation of the residential units within that phase. All ground floor amenity and playspace within the development shall be available to all residential occupiers of the development in perpetuity.

Reason:

In order that the Council may be satisfied with the details of the play strategy, in accordance with The National Planning Policy Framework 2021, S4 of the London Plan 2021 and P15 of the Southwark Plan 2022.

22 **Wheelchair housing**

Prior to the commencement of works above grade (excluding demolition and site clearance), the developer shall submit written confirmation from the appointed building control body that the specifications for each dwelling identified in the detailed construction plans for that phase meet the standard of the Approved Document M of the Building Regulations (2015) required in the schedule below and as corresponding to the approved floor plans. The development shall be carried out in accordance with the details thereby approved by the appointed building control body.

M4 (Category 2) 'accessible and adaptable':- up to 90%

M4 (Category 3)(2)(a) 'wheelchair adaptable'.- at least 10%

Reason:

In order to ensure the development complies with P8 Wheelchair accessible and adaptable housing of the Southwark Plan and D7 of the London Plan 2021.

23 **Digital Connectivity**

Prior to any above grade works of the development hereby approved (excluding demolition and site clearance), detailed plans shall be submitted to and approved in writing by the local planning authority demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within that phase of development. The development shall be carried out in accordance with these plans and maintained as such in perpetuity.

Reason:

To comply with SI 6 of the London Plan 2021.

24 **Lifts**

Prior to commencement of works above grade of the development hereby approved (excluding demolition and site clearance), detailed drawings shall be submitted to demonstrate that a suitably-sized evacuation lift (in addition to a firefighting lift) can and will be provided in each residential core within that phase of development. Once approved, the development shall be constructed in accordance with the approved drawings and maintained for as long as the development is occupied.

Reason:

In order to comply with London Plan 2021 Policy D5 Inclusive Design.

25 **Sprinkler System**

Prior to the commencement of any above grade works (excluding demolition and site clearance), full particulars of the sprinkler system to be used within the ground floor commercial units shall be submitted to and approved by the Local Planning Authority. The development shall not be carried out otherwise than in accordance with any approval given.

Reason:

To ensure that there is an adequate level of fire safety within this mixed use development.

26 **Solar Glare**

Prior to the commencement of any above grade works (excluding demolition and site clearance), details of the specification of glass with an appropriate reflectivity, demonstrating that levels of glare would be reduced to a tolerable level at all times, to be used in the carrying out of this permission shall be submitted to and approved by the Local Planning Authority. The development shall not be carried out otherwise than in accordance with any such approval given.

Reason:

To ensure that occupiers of neighbouring premises or the surrounding public realm do not suffer a loss of amenity by reason of harmful glare in accordance with the National Planning Policy Framework 2021, and Policy P56 Protection of Amenity of the Southwark Plan 2022.

Pre-occupation condition(s) - the details required to be submitted for approval by the condition(s) listed below must be submitted to and approved by the council before the building(s) hereby permitted are occupied or the use hereby permitted is commenced.

27 **Car Free Marketing**

Prior to occupation of the development, details of the marketing materials for sale and rental properties shall be submitted and approved in writing by the local planning authority clearly identifying the development as car free (excluding the permitted designated blue badge spaces)

Reason:

To ensure compliance with P54 of the Southwark Plan 2022.

28 Signage

Prior to occupation of the commercial space, a signage strategy for that unit shall be submitted and approved in writing and the works shall only be carried out in accordance with the approved details.

Reason:

In order that the Local Planning Authority may be satisfied as to the quality of the design and details, and to ensure a satisfactory townscape environment in accordance with P14 of the Southwark Plan 2022.

29 Circular Economy Post Completion Report

Prior to occupation of the development, a Post Completion Report setting out the predicted and actual performance against all numerical targets in the relevant Circular Economy Statement for that phase shall be submitted to the GLA at: CircularEconomyLPG@london.gov.uk, along with any supporting evidence as per the GLA's Circular Economy Statement Guidance.

The Post Completion Report shall provide updated versions of Tables 1 and 2 of the Circular Economy Statement, the Recycling and Waste Reporting form and Bill of Materials. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the local planning authority, and prior to occupation.

Reason:

In the interests of sustainable waste management and in order to maximise the re-use of materials.

30 Whole Life Cycle

Once the as-built design has been completed for the development (upon commencement of RIBA Stage 6) and prior to the building(s) being occupied (or handed over to a new owner, if applicable), the legal owner(s) of the development should submit the post-construction Whole Life-Cycle Carbon (WLC) Assessment for that phase to the GLA at: ZeroCarbonPlanning@london.gov.uk.

The owner should use the post construction tab of the GLA's WLC assessment template and this should be completed accurately and in its entirety, in line with the criteria set out in the GLA's WLC Assessment Guidance. The post-construction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the WLC carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the

guidance and should be received three months post as-built design completion, unless otherwise agreed.

Reason:

To ensure whole life-cycle carbon is calculated and reduced and to demonstrate compliance with Policy SI 2 of the London Plan 2021.

31 Electric Vehicle Charging Points

Prior to occupation of the development, the developer shall submit plans to show delivery of all electric vehicle charging points for the commercial and residential parking bays. The development must be implemented in accordance with the approval given.

Reason:

To encourage more sustainable travel in accordance with The National Planning Policy Framework 2021 in accordance with P54 Car Parking of the Southwark Plan 2022.

32 Cycle Storage Facilities

Prior to first occupation of the development hereby consented, and notwithstanding the approved drawings, details (1:50 scale drawings) of the facilities to be provided for the secure and covered storage of cycles for that phase shall be submitted to and approved in writing by the Local Planning Authority.

Thereafter the approved cycle parking facilities provided shall be retained and the space used for no other purpose, and the development shall not be carried out other in accordance with any such approval given.

Reason:

In order to ensure that satisfactory safe and secure cycle parking and showering facilities are provided and retained in order to encourage the use of cycling as an alternative means of transport to the development and to reduce reliance on the use of the private car in accordance with: the National Planning Policy Framework 2021; Policy T5 ('Cycling') of the London Plan 2021 and P53 ('Cycling') of the Southwark Plan 2022.

33 Integral blinds

Prior to occupation of the development, details of suitable integral blinds to all habitable rooms (which do not clash with opening windows) shall be submitted to and approved by the local Planning Authority and once approved shall installed as approved and permanently maintained thereafter.

Reason:

To ensure that the development is designed to mitigate future changes in climate and ensure occupiers of the development do not suffer a loss of amenity by reason of overheating and excess noise in accordance with the Southwark Plan 2022 Policy P14 (Design Quality) , Policy P56

(Protection of amenity), P69 (Sustainability Standards) and the National Planning Policy Framework 2021.

34 **Internal Noise Levels**

The dwellings hereby permitted shall be designed to ensure that the following internal noise levels are not exceeded due to environmental noise:

Bedrooms - 35dB LAeq T†, 30 dB L Aeq T*, 45dB LAFmax T *

Living and Dining rooms- 35dB LAeq T †

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

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

Following completion of the development and prior to occupation, a validation test shall be carried out on a relevant sample of premises. The results shall be submitted to the LPA for approval in writing. The approved scheme shall be implemented and permanently maintained thereafter.

Reason:

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

35 **Vertical Sound Transmission**

Prior to occupation, party walls, floors and ceilings between the commercial premises and residential dwellings shall be so adapted as necessary in light of the intended commercial use in order to provide reasonable resistance to the transmission of sound sufficient to ensure that noise due to the commercial premises does not exceed NR20 when measured as an LAeq across any 5 minute period in any habitable room.

Following completion of the development and prior to occupation, a validation test shall be carried out on a relevant sample of premises. The results shall be submitted to the LPA for approval in writing and the approved scheme shall be permanently maintained thereafter.

Reason:

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

36 **Refuse Storage Facilities**

Before the first occupation of any part of the development hereby approved, the refuse storage arrangements shown on the approved drawings shall be provided and made available for use by

the occupiers. The refuse storage facilities shall thereafter be retained and the space used for no other purpose.

Reason:

To ensure that the refuse will be appropriately stored within the site thereby protecting the amenity of the site and the area in general from litter, odour and potential vermin/pest nuisance in accordance with: the National Planning Policy Framework 2021 and policies P56 ('Protection of amenity') and P62 ('Reducing waste') of the Southwark Plan 2022.

37 Drainage Verification Report

No dwelling shall be occupied until a drainage verification report prepared by a suitably qualified engineer has been submitted to and approved in writing by the Local Planning Authority. The report shall provide evidence that the drainage system (incorporating SuDS) has been constructed according to the approved details and specifications (or detail any minor variations where relevant) as detailed in the Sustainable Drainage Statement prepared by BWB (ref: JIR-BWB-ZZ-XX-RP-CD-0001_SDS-S2-P05, dated March 2022) and shall include plans, photographs and national grid references of key components of the drainage network such as surface water attenuation structures, flow control devices and outfalls. The report shall also include details of the responsible management company. Prior to occupancy, the applicant shall also provide a maintenance schedule in line with the approved drainage design that details the frequency and method of maintaining the drainage infrastructure so that its functionality in the future is maintained to the standard specified in the drainage strategy.

Reason:

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

Compliance condition(s) - the following condition(s) impose restrictions and/or other requirements that must be complied with at all times once the permission has been implemented.

38 Air Quality

The development shall achieve full compliance with the air quality assessment mitigation measures as detailed in Air Quality Assessment produced by BWB dated December 2021.

Reason:

To protect future occupiers from poor external air quality in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P65 (Improving air quality), and the National Planning Policy Framework 2021.

39 Enhanced Horizontal Sound Transmission

All party walls, floors and ceilings between the commercial premises and residential dwellings shall be designed to achieve a minimum weighted standardized level difference 55dB DnTw+Ctr. Pre-occupation testing of the separating partitions shall be undertaken for airborne sound

insulation in accordance with the methodology of ISO 16283-1:2014. Details of the specification of the partition together with full results of the sound transmission testing shall be submitted to the Local Planning Authority for written approval prior to the use commencing and once approved the partition shall be permanently maintained thereafter.

Reason:

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

40 Plant Noise

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

Suitable acoustic treatments shall be used to ensure compliance with the above standard. A validation test shall be carried out and the results submitted to the Local Planning Authority for approval in writing to demonstrate compliance with the above standard. Once approved the plant and any acoustic treatments shall be permanently maintained thereafter.

Reason:

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance or the local environment from noise creep due to plant and machinery in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P66 (Reducing noise pollution and enhancing soundscapes), and the National Planning Policy Framework 2021.

41 External noise levels in amenity areas

Communal and Private external amenity and play areas shall be designed to attain 55dB(A) LAeq, 16hr †, as far as is reasonably practicable.

†Daytime - 16 hours between 07:00-23:00hrs.

Reason:

To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of excess noise sources in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity), and the National Planning Policy Framework 2021.

42 Servicing Hours

Any deliveries or collections to the development shall only be between the following hours:

06:00 - 22:00 Monday to Saturday; and

10:00 - 18:00 on Sundays and Bank Holidays.

Reason:

To ensure that the occupiers of neighbouring premises do not suffer a loss of amenity by reason of noise nuisance, and to reduce vehicle movements on the local road network during peak times, in accordance with: the National Planning Policy Framework 2021; Policy T7 ('Deliveries, Servicing and Construction') of the London Plan 2021 and policy P50 ('Highways Impacts') of the Southwark Plan 2022.

43 Hours of Use

The use hereby permitted for use-class E shall not be carried on outside of the hours 07:00 to 23:00 on any day.

The use hereby permitted for a Builders' Merchants shall not be carried on outside the hours of 06:00 to 22:00 on Mondays to Saturdays and 10:00 to 18:00 on Sundays and Bank Holidays

Reason:

To safeguard the amenity of neighbouring residential properties in accordance with The National Planning Policy Framework 2021 and Southwark Plan 2022 policy P56 ('Protection of amenity').

44 External Lighting

Any external lighting system installed at the development shall comply with Institute of Lighting Professionals Guidance Note 01/20 'Guidance notes for the reduction of obtrusive light'.

Reason:

In order that the Council may be satisfied as to the details of the development in the interest of the visual amenity of the area, the amenity and privacy of adjoining occupiers, and their protection from light nuisance, in accordance with The National Planning Policy Framework 2021, London Plan policy G6 ('Biodiversity and access to nature') and Southwark Plan 2022 policies P56 ('Protection of amenity') and P60 ('Biodiversity').

45 Fire Safety Strategy

The development hereby consented shall not be carried out other than in accordance with the approved Planning Fire Strategy Report (prepared by Jensen Hughes ref. EL6932/R1 Issue 2) dated 15/12/21.

Reason:

To minimise the risk to life and minimise building damage in the event of a fire, in accordance with: the National Planning Policy Framework 2021, and; Policy D12 ('Fire safety') of the London Plan 2021.

46 Energy Efficiency

The development hereby permitted shall be constructed in accordance with the approved Energy and Sustainability Statement (prepared by CDI ref. P05) dated 04.08.22. All measures and technologies shall remain for as long as the development is occupied, unless as otherwise agreed in writing.

Reason:

To ensure the development complies with the National Planning Policy Framework 2021 and Policy S1 2 of the London Plan 2021.

47 Roof Plant and Other Roof Structures

No roof plant, equipment or other structures, other than as shown on the drawings hereby approved or discharged under an 'approval of details' application pursuant to this Decision Notice, shall be placed on the roof or be permitted to project above the roofline of any part of the building as shown on elevational drawings or shall be permitted to extend outside of the roof plant enclosures of any building hereby permitted.

Reason:

In order to ensure that no additional plant is placed on the roof of the building in the interest of the appearance and design of the building and the visual amenity of the area, in accordance with: the National Planning Policy Framework 2021, Southwark Plan 2022 policies P13 ('Design of places') and P14 ('Design quality') of the Southwark Plan 2022 and policy D4 ('Delivering good design') of the London Plan 2021.

48 Restriction of Roofs For Use For Maintenance, Repair or Means of Escape Only

With the exception of the designated rooftop external amenity spaces and terraces depicted on the approved drawings, all areas of roof within the development hereby consented shall be used only for the purposes of maintenance, repair or means of escape, and shall not be as outdoor amenity space by the occupiers or users of the premises.

Reason:

To ensure that occupiers of neighbouring premises do not suffer a loss of amenity by reason of overlooking and noise nuisance in accordance with: the National Planning Policy Framework 2021, policy P56 ('Protection of amenity') of the Southwark Plan 2022 and policy D4 ('Delivering good design') of the London Plan 2021.

49 Restriction of Instatement of Appurtenances

With the exception of rainwater pipes, no meter boxes, flues, vents or pipes other than as shown on the drawings hereby approved or discharged under an 'approval of details' application pursuant to this permission, shall be fixed or installed on the elevations of the building, unless otherwise approved by the LPA.

Reason:

To ensure such works do not detract from the appearance of the building in accordance with: The National Planning Policy Framework 2021, Southwark Plan 2022 policies P13 ('Design of places') and P14 ('Design quality') of the Southwark Plan 2022 and policy D4 ('Delivering good design') of the London Plan 2021.

Special condition(s) - the following condition(s) are required post completion of relevant condition imposed in other sections of this decision notice

50 Archaeological Reporting

Within one year of the completion of the archaeological work on site, an assessment report detailing the proposals for the off-site analyses and post-excavation works (if required), including publication of the site and preparation for deposition of the archive, shall be submitted to and approved in writing by the Local Planning Authority, and the works detailed in the assessment report shall not be carried out otherwise than in accordance with any such approval given. The assessment report shall provide evidence of the applicant's commitment to finance and resource these works to their completion.

Reason:

In order that the archaeological interest of the site is secured with regard to the details of the post-excavation works, publication and archiving to ensure the preservation of archaeological remains by record in accordance with Policy P23 Archaeology of the Southwark Plan (2022) and the National Planning Policy Framework 2021.

51 BREEAM

(a) Before any fit out works to the non-residential units hereby authorised begins, an independently verified BREEAM Design Stage report (detailing performance in each category, overall score, BREEAM rating and a BREEAM certificate of building performance) to achieve a minimum 'excellent' rating (unless otherwise agreed by the local planning authority) shall be submitted to and approved in writing by the Local Planning Authority and the development shall not be carried out otherwise than in accordance with any such approval given;

(b) Within 6 months of the first occupation of the non-residential building hereby permitted, a certified Post Construction Review (or other verification process agreed with the local planning authority) shall be submitted to and approved in writing by the Local Planning Authority, confirming that the agreed standards at (a) have been met.

Reason:

To ensure the proposal complies with The National Planning Policy Framework 2021, Southwark Plan 2022 policy P69 ('Sustainability standards') and policy SI2 ('Minimising greenhouse gas emissions') of the London Plan 2021.

Informative notes to the applicant relating to the proposed development

THAMES WATER

1. There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>.

2. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

3. A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

ENVIRONMENT AGENCY

4. Contaminated soil that is (or must be) disposed of is waste. Therefore, its handling, transport, treatment and disposal are subject to waste management legislation, which includes:

- Duty of Care Regulations 1991

- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2016
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standard BS EN 14899:2005 'Characterization of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays. Refer to the hazardous waste pages on gov.uk for more information.

The CLAIRE Definition of Waste: Development Industry Code of Practice (version 2) provides operators with a framework for determining whether or not excavated material arising from site during remediation and/or land development works are waste or have ceased to be waste. Under the Code of Practice: excavated materials that are recovered via a treatment operation can be re-used on-site providing they are treated to a standard such that they fit for purpose and unlikely to cause pollution treated materials can be transferred between sites as part of a hub and cluster project formally agreed with the Environment Agency. Some naturally occurring clean material can be transferred directly between sites. Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

The Environment Agency recommends that developers should refer to: the Position statement on the Definition of Waste: Development Industry Code of Practice and; The Environmental regulations page on GOV.UK

RELEVANT PLANNING POLICY

National Planning Policy Framework

The revised National Planning Policy Framework ('NPPF') was published on 20 July 2021 which sets out the national planning policy and how this needs to be applied. The NPPF focuses on sustainable development with three key objectives: economic, social and environmental. Paragraph 218 states that the policies in the Framework are material considerations, which should be taken into account in dealing with applications.

The following chapters are relevant:

Chapter 2 Achieving sustainable development

Chapter 6 Building a strong, competitive economy

Chapter 7 Ensuring the vitality of town centres

Chapter 8 Promoting healthy and safe communities

Chapter 9 Promoting sustainable transport

Chapter 11 Making effective use of land

Chapter 12 Achieving well-designed places

Chapter 14 Meeting the challenge of climate change, flooding and coastal change

Chapter 16 Conserving and enhancing the historic environment

New London Plan 2021 Policies

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

The relevant policies are:

GG1 Building strong and inclusive communities

GG2 Making the best use of land

GG3 Creating a healthy city

GG5 Growing a good economy

GG6 Increasing efficiency and resilience

Policy SD1 Opportunity Areas

Policy SD6 Town centres and high streets

Policy SD7 Town centres: development principles and Development Plan Documents

Policy SD8 Town centre network

Policy SD9 Town centres: Local partnerships and implementation

Policy SD10 Strategic and local regeneration

Policy D1 London's form, character and capacity for growth

Policy D2 Infrastructure requirements for sustainable densities

Policy D3 Optimising site capacity through the design-led approach

Policy D4 Delivering good design

Policy D5 Inclusive design

Policy D7 Accessible housing

Policy D8 Public realm

Policy D9 Tall buildings

Policy D10 Basement development

Policy D11 Safety, security and resilience to emergency

Policy D12 Fire safety

Policy D14 Noise

Policy H1 Increasing housing supply

Policy H4 Delivering affordable housing

Policy H5 Threshold approach to applications

Policy H6 Affordable housing tenure

Policy H7 Monitoring of affordable housing

Policy H10 Housing size mix

Policy S1 Developing London's social infrastructure

Policy E2 Providing suitable business space

Policy E11 Skills and opportunities for all

Policy HC1 Heritage conservation and growth

Policy HC2 World Heritage Sites

Policy HC3 Strategic and Local Views

Policy HC4 London View Management Framework

Policy G1 Green infrastructure

Policy G5 Urban greening

Policy G6 Biodiversity and access to nature

Policy G7 Trees and woodlands

Policy SI 1 Improving air quality

Policy SI 2 Minimising greenhouse gas emissions

Policy SI 3 Energy infrastructure

Policy SI 4 Managing heat risk

Policy SI 5 Water infrastructure

Policy SI 6 Digital connectivity infrastructure

Policy SI 7 Reducing waste and supporting the circular economy

Policy SI 8 Waste capacity and net waste self-sufficiency

Policy SI 12 Flood risk management

Policy SI 13 Sustainable drainage

Policy T1 Strategic approach to transport

Policy T2 Healthy Streets

Policy T3 Transport capacity, connectivity and safeguarding

Policy T4 Assessing and mitigating transport impacts

Policy T5 Cycling

Policy T6 Car parking

Policy T6.2 Office parking

Policy T6.3 Retail parking

Policy T6.5 Non-residential disabled persons parking

Policy T7 Deliveries, servicing and construction

Policy T9 Funding transport infrastructure through planning

Southwark Plan 2022

ST1 Southwark's Development targets

ST2 Southwark's Places

SP1a Southwark's development targets

SP1b Southwark's places

SP1 Quality affordable homes

SP3 Great start in life

SP4 Green and inclusive economy

SP5 Thriving neighbourhoods and tackling health equalities

SP6 Climate Change

AV.13 Old Kent Road Area Vision

P1 Social rented and intermediate housing

P2 New family homes

P7 Wheelchair accessible and adaptable housing

P12 Design of places

P13 Design quality

P16 Designing out crime

P17 Tall buildings

P18 Efficient use of land

P20 Conservation areas

P21 Conservation of the historic environment and natural heritage

P22 Borough views

P23 Archaeology

P28 Access to employment and training

P29 Strategic protected industrial land

P30 Office and business development

P31 Affordable workspace

P32 Small shops

P35 Town and local centres

P44 Broadband and digital infrastructure

P45 Healthy developments

P47 Community uses

P49 Public transport

P50 Highways impacts

P51 Walking

P53 Cycling

P54 Car Parking

P55 Parking standards for disabled people and the mobility impaired

P56 Protection of amenity

P57 Open space

P59 Green infrastructure

P60 Biodiversity

P61 Trees

P62 Reducing waste

P64 Contaminated land and hazardous substances

P65 Improving air quality

P66 Reducing noise pollution and enhancing soundscapes

P67 Reducing water use

P68 Reducing flood risk

P69 Sustainability standards

P70 Energy

IP2 Transport infrastructure

IP3 Community infrastructure levy and section 106 planning obligations.

Mayors SPD/SPGs

Sustainable Design and Construction (April 2014)

Use of planning obligations in the funding of Crossrail, and the Mayoral Community Infrastructure Levy (April 2013)

London View Management Framework (March 2012)

Planning for Equality and Diversity in London (October 2007)

The Mayor's Good Practice Guide to Estate Regeneration

Southwark SPDs/SPGs

Design and Access Statements (2007)

Residential Design Standards (2011 with 2015 update)

S106 and CIL (2015)

S106 and CIL Addendum (2017)

Sustainability Assessments (2007)

Sustainable Design and Construction (2009)

Sustainable Transport (2009)

Southwark AAP's

Draft Old Kent Road Area Action Plan (December 2020)

PLANNING HISTORY OF THE SITE AND NEARBY SITES

Relevant Site History

Planning application (21/AP/1146) for: Screening Opinion to determine whether an Environmental Impact Assessment is required for the demolition of existing building and redevelopment of a mixed use scheme comprising approximately 1,125 sqm (GIA) plus 1,065 sqm (GEA) external yard that retains the existing Jewsons Builders Merchant on site, and up to 202 residential units (Use Class C3) in two blocks of 9/13 and 27 storeys above ground

Relevant History of Adjoining Sites

The council has approved a number of planning applications recently in the Old Kent Road Opportunity Area including:

840 Old Kent Road, London SE15 1NQ

Planning application (19/AP/1322) granted for: Demolition of existing building and redevelopment of the site to provide a new building of up to 13 and 21 storeys in height (maximum height 73.60m above ground level). Redevelopment to comprise 170 residential units (Class C3), a 1,778 sqm (GIA) retail unit (Class A1) and a 52 sqm (GIA) flexible retail unit (Class A1/A3), with associated landscaping, car parking, servicing, refuse and plant areas, and all ancillary or associated works.

227-255 Ilderton Road, SE15, OLD KENT ROAD AND LAND AT LIVESEY PLACE, LONDON, SE15 1NS

Planning application (19/AP/1773) granted: Demolition of existing buildings and the erection of a part 2/3, 9 and 28 storey (up to 94.65m AOD) mixed-use development comprising of 3,581 sqm including 2,538 sqm of industrial floorspace (Use Classes B1c/B8) at ground and intermediate levels, 598 sqm of internal loading yard, 445 sqm ancillary plant and equipment; and 253 residential apartments (C3), 35.75% affordable by habitable room, and other associated infrastructure.

This application represents a departure from strategic policy 10 'Jobs and Businesses' of the Core Strategy (2011) and Saved Policy 1.2 'Strategic and Local Preferred Industrial Locations' of the Southwark Plan (2007) by virtue of proposing to introduce residential accommodation in a preferred industrial location.

Devonshire Grove 747-759 & 765-775 OLD KENT ROAD, LONDON SE15 1NZ & LAND AT DEVONSHIRE GROVE SE15

Full planning permission (19/AP/1239) for the demolition of all existing structures on site, the stopping up of the existing Devonshire Grove major arm (IWWMF egress road) and redevelopment to include formation of a new road reconfiguration and widening of Devonshire Grove, widening of the foot ways on Sylvan Grove and Old Kent Road, construction of Building A at ground plus 38 storeys to provide 264 residential units (Class C3), flexible retail/employment floorspace (Class A1/A2/A3/A4/B1a-c), creation of a new public realm including new public squares and spaces, associated landscaping and highways works and a new substation and all associated works.

Outline planning permission (all matters reserved) for comprehensive mixed-use development for the following uses in four Buildings (B, C, D and E) and a basement level shared with Building A: Up to a maximum of 301 residential units (Class C3); employment workspace floorspace (Class B1a-c); flexible retail, financial and professional services, food and drink uses (Class A1/A2/A3/A4/A5), flexible non-residential institutions (Class D1) and Assembly and leisure uses (Class D2); Storage, car and cycle parking; Energy centre; Substations; Formation of new pedestrian and vehicular access and means of access and circulation within the site together; and new private and communal open space.

Daisy Business Park 19-35 Sylvan Grove London SE15

Planning permission (19/AP/2307) for demolition of existing buildings and redevelopment of the site to provide a mixed use development comprising of 219 residential dwellings (Use Class C3) and 3,088 sqm (GIA); commercial workspace (Use Class B1) within two buildings of 5 storeys (24.55m AOD) and 32 storeys (106.43m AOD); and associated car and cycle parking, landscaping, and public realm and highways improvements.

313-349 Ilderton Road London, SE15

Planning permission (20/AP/1329) for Demolition of existing buildings and construction of two buildings, one of part 11 and 13 storeys and one of part 13 and 15 storeys, to provide 1,739sq.m (GIA) of commercial floorspace, 250 student accommodation bed spaces (Sui Generis) and 58 residential units, with associated access and highway works, amenity space, cycle parking spaces, disabled car parking spaces and refuse/ recycling stores.

CONSULTATION UNDERTAKEN

Site notice date: 23.03.2022

Press notice date: 27.01.3022

Case officer site visit date: 23.03.2022

Neighbour consultation letters sent: 21.01.2022

Internal services consulted

Ecology
Environmental Protection
Highways Development and Management
Flood Risk Management & Urban Drainage
Transport Policy
Urban Forester
Waste Management
Section 106 Team and CiL team
Tree Services
Public Health
Local Economy
Arboricultural Services

Statutory and non-statutory organisations

Environment Agency
Greater London Authority
Transport for London
Metropolitan Police Service (Designing Out Crime)
Thames Water
National Grid
London Fire & Emergency Planning Authority
Natural England
Historic England
Health and Safety Executive: Fire Risk Assessments
Arqiva
Bakerloo Line Safeguarding
Civil Aviation Authority
Vital Old Kent Road

Neighbour and local groups consulted

Name/Address	Period	Date Printed	Reply by
Flat 6 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
145 Ormside Street London Southwark SE15 1TF	B28	21/01/2022	18/02/2022
Unit 3 96 - 108 Ormside Street London Southwark SE	B28	21/01/2022	18/02/2022
182-196 Ilderton Road London Southwark SE15 1NT	B28	21/01/2022	18/02/2022
8 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
Unit 29 The Penarth Centre Penarth Street London S	B28	21/01/2022	18/02/2022
Apartment 5 90 Varcoe Road London Southwark SE16 3	B28	21/01/2022	18/02/2022
Flat 4 Atar House 179 Ilderton Road London Southwa	B28	21/01/2022	18/02/2022
Unit 21A The Penarth Centre Penarth Street London	B28	21/01/2022	18/02/2022
Unit 12 The Penarth Centre Penarth Street London S	B28	21/01/2022	18/02/2022
14-38 Hatcham Road London Southwark SE15 1TW	B28	21/01/2022	18/02/2022
20 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
6 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
Flat 22 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
Flat 9 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022

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206-210 Ilderton Road London Southwark SE15 1NT	B28	21/01/2022	18/02/2022
Apartment 3 90 Varcoe Road London Southwark SE16 3	B28	21/01/2022	18/02/2022
Flat 8 Atar House 179 Ilderton Road London Southwark	B28	21/01/2022	18/02/2022
Units 32 And 32A The Penarth Centre Penarth Street	B28	21/01/2022	18/02/2022
Units 16 And 17 The Penarth Centre Penarth Street	B28	21/01/2022	18/02/2022
Flat 20 Shirley Chisholm Court 62 Hatcham Road Lon	B28	21/01/2022	18/02/2022
Flat 12 Shirley Chisholm Court 62 Hatcham Road Lon	B28	21/01/2022	18/02/2022
Flat 5 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 4 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
132-136 Ormside Street London Southwark SE15 1TF	B28	21/01/2022	18/02/2022
First Floor 96-108 Ormside Street London Southwark	B28	21/01/2022	18/02/2022
Flat 3 Atar House 179 Ilderton Road London Southwark	B28	21/01/2022	18/02/2022
Flat B 219 Ilderton Road London Southwark SE15 1NS	B28	21/01/2022	18/02/2022
International Secretariat 215 Ilderton Road London	B28	21/01/2022	18/02/2022
Flat 7 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022

Name/Address	Period	Date Printed	Reply by
Flat 2 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
90 Varcoe Road London Southwark SE16 3DG	B28	21/01/2022	18/02/2022
Flat 2 Atar House 179 Ilderton Road London Southwark	B28	21/01/2022	18/02/2022
5 - 9 Record Street London Southwark SE15 1TL	B28	21/01/2022	18/02/2022
19 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
17 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
16 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
12 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
Studio 13 40-50 Hatcham Road London Southwark SE15	B28	21/01/2022	18/02/2022
Studio 10 40-50 Hatcham Road London Southwark SE15	B28	21/01/2022	18/02/2022
Studio 3 40-50 Hatcham Road London Southwark SE15	B28	21/01/2022	18/02/2022
Unit A Atar House 179 Ilderton Road London Southwark	B28	21/01/2022	18/02/2022
Unit 28B The Penarth Centre Penarth Street London	B28	21/01/2022	18/02/2022
Flat A 219 Ilderton Road London Southwark SE15 1NS	B28	21/01/2022	18/02/2022
Flat 1 211 Ilderton Road London Southwark SE15 1NS	B28	21/01/2022	18/02/2022
236 Record Street London Southwark SE15 1TL	B28	21/01/2022	18/02/2022

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Units 18 And 33 The Penarth Centre Penarth Street	B28	21/01/2022	18/02/2022
Flat 24 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 18 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 9 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 8 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 7 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
10 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
Unit 1 62 Hatcham Road London Southwark SE15 1TW	B28	21/01/2022	18/02/2022
Flat 13 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
21 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
11 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
147 Ormside Street London Southwark SE15 1TF	B28	21/01/2022	18/02/2022
Studio 11 40-50 Hatcham Road London Southwark SE15	B28	21/01/2022	18/02/2022
Unit 20 Right The Penarth Centre Penarth Street Lo	B28	21/01/2022	18/02/2022
Flat 1 213 Ilderton Road London Southwark SE15 1NS	B28	21/01/2022	18/02/2022

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Flat A 209 Ilderton Road London Southwark SE15 1NS	B28	21/01/2022	18/02/2022
7 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
Flat 19 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
Flat 12 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
180 Ilderton Road London Southwark SE15 1NT	B28	21/01/2022	18/02/2022
127-135 Ormside Street London Southwark SE15 1TF	B28	21/01/2022	18/02/2022
137 Ormside Street London Southwark SE15 1TF	B28	21/01/2022	18/02/2022
Apartment 1 90 Varcoe Road London Southwark SE16 3	B28	21/01/2022	18/02/2022
Flat 1 Atar House 179 Ilderton Road London Southwark	B28	21/01/2022	18/02/2022
Unit 21B The Penarth Centre Penarth Street London	B28	21/01/2022	18/02/2022
Flat 2 221 Ilderton Road London Southwark SE15 1NS	B28	21/01/2022	18/02/2022
21 Hatcham Road London Southwark SE15 1TW	B28	21/01/2022	18/02/2022
Unit 7 The Penarth Centre Penarth Street London Southwark	B28	21/01/2022	18/02/2022
Flat 23 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 22 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 17 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022

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Flat 14 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 10 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 3 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 2 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
179A Ilderton Road London Southwark SE16 3LA	B28	21/01/2022	18/02/2022
Flat 10 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
223-225 Ilderton Road London Southwark SE15 1NS	B28	21/01/2022	18/02/2022
Asaholah Salvation Church Of God 137A Ormside Stre	B28	21/01/2022	18/02/2022
18 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
Ilderton Primary School Ilderton Road London Southwark	B28	21/01/2022	18/02/2022
Units 5 And 6 The Penarth Centre Penarth Street Lo	B28	21/01/2022	18/02/2022
Unit 28A The Penarth Centre Penarth Street London	B28	21/01/2022	18/02/2022
Ground Floor 180 Ilderton Road London Southwark SE	B28	21/01/2022	18/02/2022
First Floor 145 Ormside Street London Southwark SE	B28	21/01/2022	18/02/2022
Unit 4 62 Hatcham Road London Southwark SE15 1TW	B28	21/01/2022	18/02/2022

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22 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
Flat 1 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
110-116 Ormside Street London Southwark SE15 1TF	B28	21/01/2022	18/02/2022
Studio 12 40-50 Hatcham Road London Southwark SE15	B28	21/01/2022	18/02/2022
Studio 7 40-50 Hatcham Road London Southwark SE15	B28	21/01/2022	18/02/2022
Flat A 217 Ilderton Road London Southwark SE15 1NS	B28	21/01/2022	18/02/2022
Unit 19 The Penarth Centre Penarth Street London S	B28	21/01/2022	18/02/2022
Unit 1 And 2 96-108 Ormside Street London Southwark	B28	21/01/2022	18/02/2022
Flat A 154 Ilderton Road London Southwark SE15 1NT	B28	21/01/2022	18/02/2022
Unit 30 The Penarth Centre Penarth Street London	B28	21/01/2022	18/02/2022
Flat 2 211 Ilderton Road London Southwark SE15 1NS	B28	21/01/2022	18/02/2022
235 Record Street London Southwark SE15 1TL	B28	21/01/2022	18/02/2022
Unit 32A The Penarth Centre Penarth Street London	B28	21/01/2022	18/02/2022
Flat 27 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 26 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022

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Flat 19 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 15 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 3 211 Ilderton Road London Southwark SE15 1NS	B28	21/01/2022	18/02/2022
Flat 2 213 Ilderton Road London Southwark SE15 1NS	B28	21/01/2022	18/02/2022
Studio 5 40-50 Hatcham Road London Southwark SE15	B28	21/01/2022	18/02/2022
Flat B 152 Ilderton Road London Southwark SE15 1NT	B28	21/01/2022	18/02/2022
Unit 11 The Penarth Centre Penarth Street London S	B28	21/01/2022	18/02/2022
23 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
9 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
107-113 Ormside Street London Southwark SE15 1TF	B28	21/01/2022	18/02/2022
Studio 6 40-50 Hatcham Road London Southwark SE15	B28	21/01/2022	18/02/2022
Apartment 4 90 Varcoe Road London Southwark SE16 3	B28	21/01/2022	18/02/2022
Units 1 And 2 237 Record Street London Southwark S	B28	21/01/2022	18/02/2022
Units 32B And C The Penarth Centre Penarth Street	B28	21/01/2022	18/02/2022
Flat 29 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 28 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022

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Flat 13 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Second Floor Flat 209 Ilderton Road London Southwark	B28	21/01/2022	18/02/2022
Studio 1 40-50 Hatcham Road London Southwark SE15	B28	21/01/2022	18/02/2022
Flat 7 Atar House 179 Ilderton Road London Southwark	B28	21/01/2022	18/02/2022
Unit 22 The Penarth Centre Penarth Street London S	B28	21/01/2022	18/02/2022
140 Ilderton Road London Southwark SE15 1NT	B28	21/01/2022	18/02/2022
18-22 Penarth Street London Southwark SE15 1TX	B28	21/01/2022	18/02/2022
Flat 23 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
Flat 10 Atar House 179 Ilderton Road London Southwark	B28	21/01/2022	18/02/2022
Studio 8 40-50 Hatcham Road London Southwark SE15	B28	21/01/2022	18/02/2022
25 Hatcham Road London Southwark SE15 1TW	B28	21/01/2022	18/02/2022
Penarth Works Penarth Street London Southwark SE15	B28	21/01/2022	18/02/2022
Unit 8 The Penarth Centre Penarth Street London So	B28	21/01/2022	18/02/2022
Flat 14 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
Flat 11 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022

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Flat 8 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
River Of Life Pentecostal Church 12-38 Hatcham Road	B28	21/01/2022	18/02/2022
202 Ilderton Road London Southwark SE15 1NT	B28	21/01/2022	18/02/2022
221 Ilderton Road London Southwark SE15 1NS	B28	21/01/2022	18/02/2022
139 Ormside Street London Southwark SE15 1TF	B28	21/01/2022	18/02/2022
Studio 4 40-50 Hatcham Road London Southwark SE15	B28	21/01/2022	18/02/2022
Flat 5 Atar House 179 Ilderton Road London Southwark	B28	21/01/2022	18/02/2022
Unit 20 Left The Penarth Centre Penarth Street London	B28	21/01/2022	18/02/2022
Flat B 154 Ilderton Road London Southwark SE15 1NT	B28	21/01/2022	18/02/2022
Ground Floor 145 Ormside Street London Southwark S	B28	21/01/2022	18/02/2022
Unit 1 140 Ilderton Road London Southwark SE15 1NT	B28	21/01/2022	18/02/2022
Unit 14 And 15 The Penarth Centre Penarth Street L	B28	21/01/2022	18/02/2022
Unit 25 107 - 113 Ormside Street London Southwark	B28	21/01/2022	18/02/2022
Flat 21 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 16 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022

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Flat 1 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 11 Atar House 179 Ilderton Road London Southw	B28	21/01/2022	18/02/2022
Flat 5 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
Flat 15 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
Flat 20 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
Flat 18 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
Unit 24 The Penarth Centre Penarth Street London S	B28	21/01/2022	18/02/2022
Unit 13 The Penarth Centre Penarth Street London S	B28	21/01/2022	18/02/2022
Apartment 2 90 Varcoe Road London Southwark SE16 3	B28	21/01/2022	18/02/2022
Studio 2 40-50 Hatcham Road London Southwark SE15	B28	21/01/2022	18/02/2022
143 Ormside Street London Southwark SE15 1TF	B28	21/01/2022	18/02/2022
Unit 31 The Penarth Centre Penarth Street London S	B28	21/01/2022	18/02/2022
Unit 25 And 26 The Penarth Centre Penarth Street L	B28	21/01/2022	18/02/2022
Unit 3 The Penarth Centre Penarth Street London So	B28	21/01/2022	18/02/2022
113 Ormside Street London Southwark SE15 1TF	B28	21/01/2022	18/02/2022

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Flat 1 221 Ilderton Road London Southwark SE15 1NS	B28	21/01/2022	18/02/2022
13 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
Flat 17 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
Flat 16 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
24 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
148-150 Ilderton Road London Southwark SE15 1NT	B28	21/01/2022	18/02/2022
217 Ilderton Road London Southwark SE15 1NS	B28	21/01/2022	18/02/2022
115-125 Ormside Street London Southwark SE15 1TB	B28	21/01/2022	18/02/2022
Studio 9 40-50 Hatcham Road London Southwark SE15	B28	21/01/2022	18/02/2022
Flat 6 Atar House 179 Ilderton Road London Southwark	B28	21/01/2022	18/02/2022
Flat A 152 Ilderton Road London Southwark SE15 1NT	B28	21/01/2022	18/02/2022
Part First Floor Front 180 Ilderton Road London So	B28	21/01/2022	18/02/2022
141 Ormside Street London Southwark SE15 1TF	B28	21/01/2022	18/02/2022
Unit 2 140 Ilderton Road London Southwark SE15 1NT	B28	21/01/2022	18/02/2022
Flat 25 Shirley Chisholm Court 62 Hatcham Road Lon	B28	21/01/2022	18/02/2022

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Flat 11 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 6 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 4 Shirley Chisholm Court 62 Hatcham Road London	B28	21/01/2022	18/02/2022
Flat 12 Atar House 179 Ilderton Road London Southwark	B28	21/01/2022	18/02/2022
Flat 24 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
15 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
14 Gerards Close London Southwark SE16 3DF	B28	21/01/2022	18/02/2022
Unit 34 The Penarth Centre Penarth Street London S	B28	21/01/2022	18/02/2022
Unit 2 62 Hatcham Road London Southwark SE15 1TW	B28	21/01/2022	18/02/2022
Unit 23 The Penarth Centre Penarth Street London S	B28	21/01/2022	18/02/2022
First Floor Flat 209 Ilderton Road London Southwark	B28	21/01/2022	18/02/2022
Unit 3 62 Hatcham Road London Southwark SE15 1TW	B28	21/01/2022	18/02/2022
118-120 Ormside Street London Southwark SE15 1TF	B28	21/01/2022	18/02/2022
Flat 21 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022
Flat 3 Warlingham House Varcoe Road London Southwark	B28	21/01/2022	18/02/2022

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Apartment 6 90 Varcoe Road London B28 Southwark SE16 3		21/01/2022	18/02/2022
Flat 9 Atar House 179 Ilderton Road London B28 Southwark		21/01/2022	18/02/2022
First Floor Rear 180 Ilderton Road London B28 Southwark		21/01/2022	18/02/2022
Corner Of Sharratt Street 257-283 Ilderton B28 Road London		21/01/2022	18/02/2022
Unit 1 2 And 4 The Penarth Centre Penarth B28 Street London		21/01/2022	18/02/2022

CONSULTATION RESPONSES RECEIVED

Statutory and non-statutory organisations

Environment Agency
Greater London Authority
Transport for London
Metropolitan Police Service (Designing Out Crime)
London Fire & Emergency Planning Authority
London Underground
Network Rail
Natural England
Historic England
Health and Safety Executive: Fire Risk Assessments
Bakerloo Line Safeguarding

Neighbour and local groups

Unit 5/6 The Penarth Centre, Penarth Street London SE15 1TR