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<b>Item No.</b> 7.2	<b>Classification:</b> Open	<b>Date:</b> 19 December 2022	<b>Meeting Name:</b> Planning Committee
<b>Report title:</b>	<b>Development Management planning application:</b> Application 21/AP/1667 for: FULL PLANNING APPLICATION  <b>Address:</b> 310-330 St James's Road, Southwark, SE1 5JX London  <b>Proposal:</b> Retention of existing Live/work unit and redevelopment of the site comprising demolition of existing buildings and erection of three buildings (7, 8 and 19 storeys with maximum AOD height of 62.27m) to provide new residential development and the provision of Class E(g)(iii) light industrial floorspace and Class E(g)(i) office floorspace with public realm improvements, amenity space, cycle parking spaces, disabled car parking spaces and refuse/recycling stores and other associated works.		
<b>Ward(s) or groups affected:</b>	Old Kent Road		
<b>From:</b>	Director of Planning and Growth		
<b>Application Start Date</b>	14 May 2021		<b>Application Expiry Date</b> 13 August 2021
<b>Earliest Decision Date</b>	<b>Time extension:</b> 30 April 2023		

## RECOMMENDATIONS

1. That planning permission be granted, subject to conditions, referral to the Mayor of London and the applicant entering into an appropriate legal agreement by no later than the 30 April 2023.
2. In the event that the requirements of (1.) are not met by the 30 April 2023 that the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reasons set out at paragraph 309 of this report.

## EXECUTIVE SUMMARY

### Residential:

Tenure	Studio	1-bed	2-bed	3-bed	4-bed	Total homes (Units)	Hab rooms	Hab rooms (%)
Proposed social rent	0	11	2	15	2	30	117	25.1%
Proposed Intermediate	0	10	9	0	0	19	47	10%

Market sale	8	25	55	16	0	104	303	64.9%
<b>Total</b>	<b>8</b>	<b>46</b>	<b>66</b>	<b>31</b>	<b>2</b>	<b>153</b>	<b>467</b>	<b>100</b>
Percentage	5.2	30.1	43.1	20.3	1.3			

**Affordable housing**

(by hab room)

35.1%

**Commercial GIA:**

Use Class	Existing	Proposed	Change +/-
<b>Class E(g)(i) (offices / workspace)</b>	285sqm	285sqm	0sqm
<b>Class E(g)(iii) (light industrial)</b>	398.5sqm	1,615sqm	+1,216.5sqm
<b>B8 Storage and Distribution</b>	1,261.5sqm	0sqm	-1,261.5sqm
<b>Ancillary Community space</b>	0sqm	33sqm	+33sqm

**Environmental:**

<b>CO2 Savings beyond part L Building Regs</b>	65% - Domestic element 51% - Non-domestic element
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	Existing	Proposed	Change +/-
<b>Urban Greening Factor</b>	0	0.41	0.41
<b>Surface water run off rates (1 in 100 year)</b>	51.1 l/s	1.3 l/s	49.8 l/s
<b>Green/Brown Roofs</b>	0sqm	0sqm	+813sqm
<b>Cycle parking spaces</b>	0	255	+255

**CIL and S106 (Or Unilateral Undertaking):**

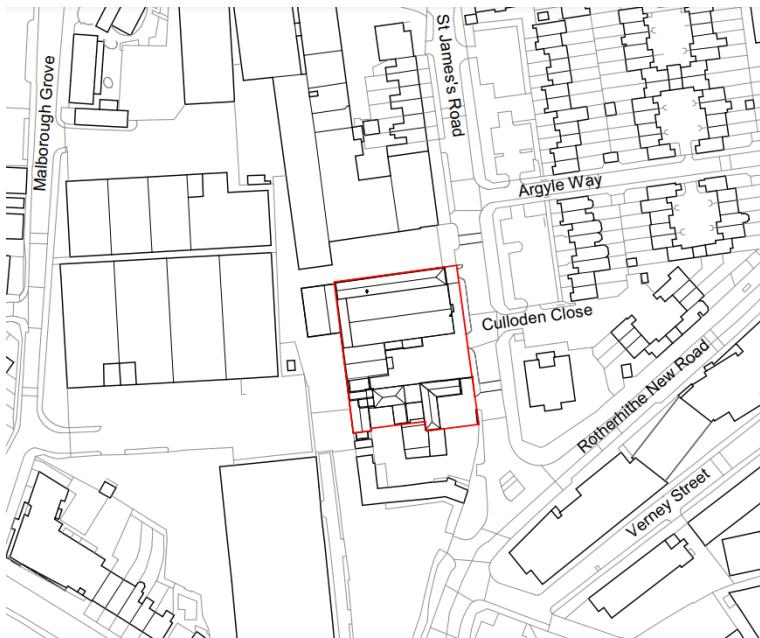
<b>CIL net of relief (estimated)</b>	£2,1521,135
<b>MCIL net of relief (estimated)</b>	£522,109
<b>S106</b>	£838,755

## BACKGROUND INFORMATION

### Site location and description

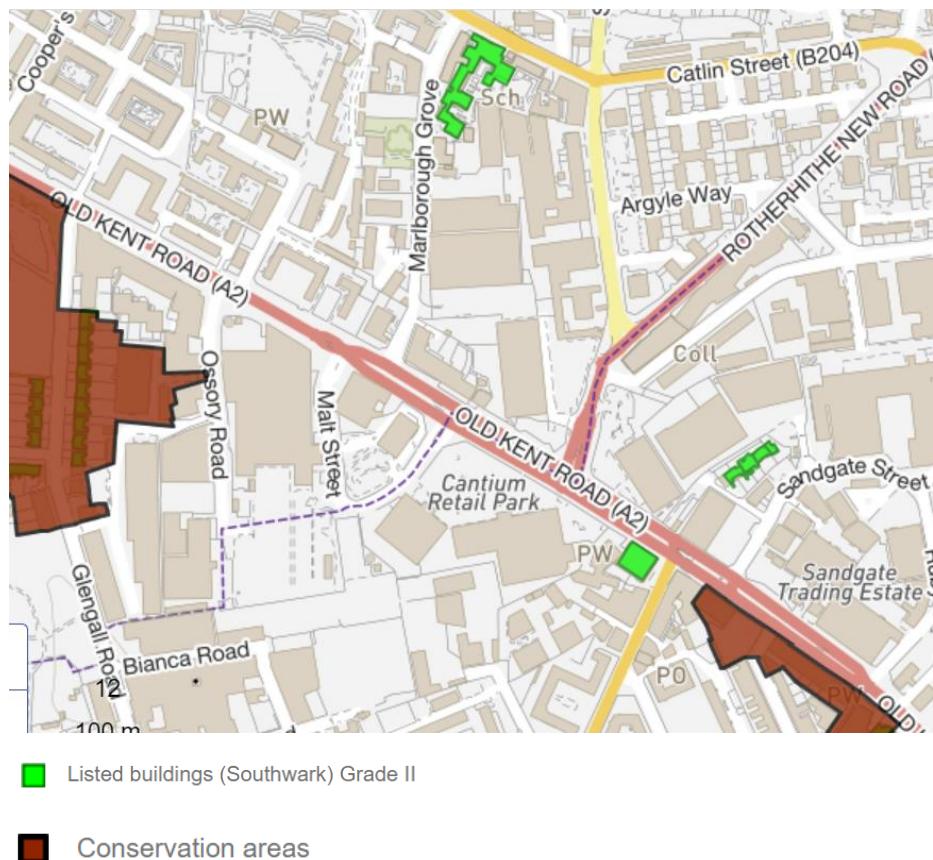
3. The site comprises a series of buildings that are in industrial use located on the western side of St James's Road. These buildings are as follows:
  - 310 - 326 St James's Road – the largest building on the site this is a two storey shed with storage and central parking yard. It was a former storage unit of a wholesale meat and poultry business and also includes a garage and smaller ancillary storage/office unit towards the rear.
  - 328 St James's Road – an L-shaped three storey building owned by Firetechnics Systems set back from St James's Road frontage.
  - 330 St James's Road – Two to three storey building that houses artist studios, workshop space and a live/work. This building is accessed from the yard from the south of the site.
4. The site currently has two points of access with the primary access from St James's Road. The secondary access point is from the yard to the south of the site. This yard is accessed from St James's Road, and a right of way across this yard currently gives access to 330 St James's Road.
5. The area immediately surrounding the site (north, west and south) are predominantly industrial/commercial. There are residential uses on the eastern side of St James's Road and further west on Marlborough Grove.
6. The building immediately to the north is the Chevron Apartments, which has been granted planning permission subject to the completion of a s106 agreement to be extended up to seven storeys (ref. 19/AP/6395).
7. Six Bridges Industrial Estate is located immediately to the west of the site, and is occupied by large two-storey warehouses. To the south of the site is a cluster of two storey industrial buildings around a yard with vehicle access. On the opposite side of the street is the residential development around Culloden Close which is made up of predominantly two storey houses, and a four storey apartment block.

## **Image: Site Location**



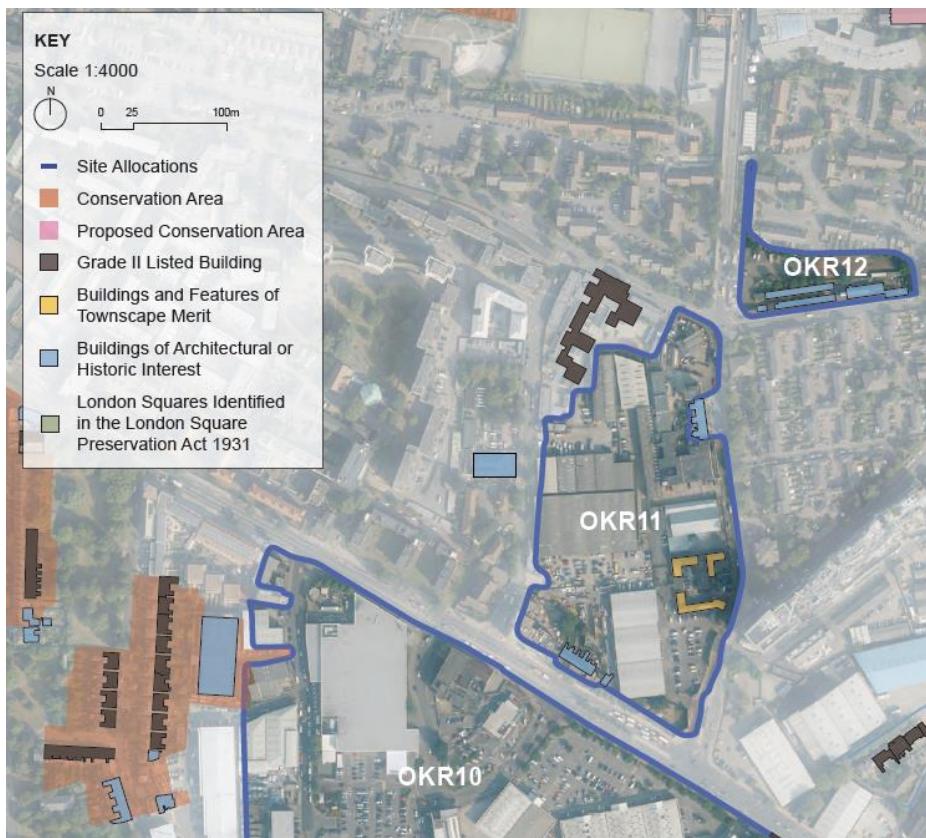
8. The site is not within a conservation area and the existing building is not listed. The building at No. 330 is however, identified as a building of architectural merit. The nearest conservation areas are Thorburn Square and Glengall Road, which are over 260m away. The nearest listed building is the Phoenix Primary School located to the north on Rolls Road, which is Grade II Listed. The mural depicting the history of the Old Kent Road, which is also close by on the Civic and Livesey Building, is Grade II listed, as are the nearby Canal Grove Cottages. These listed heritage assets are at least 123m from the site.

## Image: Heritage assets



9. The site is within the Southwark Plan Site Allocation NSP67 Marlborough Grove and St James's Road. The subject site is located in the Old Kent Road Opportunity Area. It is within Sub Area 2, 'Cantium Retail Park and Marlborough Grove' and specifically proposal site OKR11 (Marlborough Road and St James's Road) in the Old Kent Road Area Action Plan (OKRAAP). Within this site allocation, the indicative capacity is for 1,200 new homes and over 740 new jobs. The site is within an Urban Density Zone and an Air Quality Management Area (AQMA). The site is located in Flood Zone 3 as identified by the Environment Agency. The site is designated as being within North Southwark and Roman Roads Archaeological Priority Area.

## Map: Site allocation in Draft AAP



10. 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 3 on the PTAL system indicating moderate accessibility to public transport.
11. The Bakerloo Line Extension (BLE) project continues to be developed by TfL, with detailed design work of both the tunnels and stations ongoing. Safeguarding still remains in place for the future provision of the BLE.

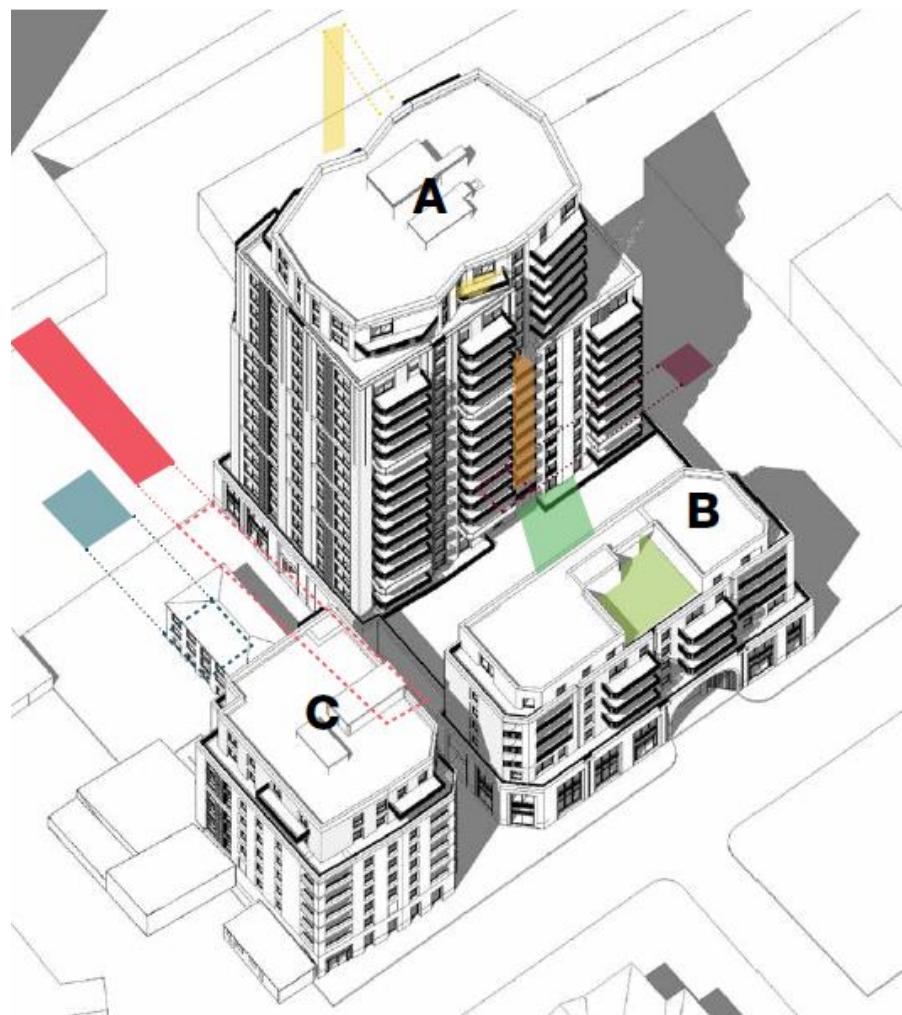
## Details of proposal

12. Planning permission is sought for the demolition of the existing buildings on site and redevelopment for mixed use development providing 1,900sqm commercial Class E(g) use and 153 homes. The existing Roca building (330 St James's Road) would be retained, refurbished and remodelled to provide mixed commercial and a retained live/work unit.
13. In terms of the split in the commercial use, the development would provide:

<b>Class use</b>	<b>Floor area (sqm)</b>
Class E(g)(i) Office	285
Class E(g)(iii) Light industrial	1,615
<b>Total</b>	<b>1,900</b>

- 14. The total at 1,900sqm commercial space is slightly below the existing 1,945sqm. This is discussed in the assessment section below. 110sqm of plant space for the commercial use is proposed. 319sqm of internal servicing yard is proposed.
- 15. The applicant also proposes a community room (33sqm) and this would be for the residents use, but could also be opened up the general community.
- 16. The site would be split into two parts with a pedestrian route running across the site east to west from St James's Road and the Six Bridges Estate. The northern part of the site would be a podium block with two towers above and the southern part of the site would be a standalone 8 storey block. The retained Roca building would be to the south of the proposed pedestrian route.

**Image: Block layout**



## Plan: Indicative Site plan



17. The podium block (also referred to as the Northern block in this report) would cover most of the site coverage and contain the majority of the residential units. The ground and mezzanine floors would provide the E(g)(iii) light industrial class floorspace, fronting both St James's Road and the new pedestrian route. Industrial uses are proposed along the east, north and west edges of the podium that is located on the north of the site. The two buildings sitting above the podium are 17 residential storeys (Block A) and 5 residential storeys (Block B). Access to the residential buildings would be along the pedestrian route. Building A would provide a mix of intermediate and private flats and Building B a mix of social rented and intermediate tenure units.
18. The basement level provides plant accommodation and is accessed from Building B's residential stair core for maintenance. The UKPN substation is located at ground floor, at the northeastern corner of the development, allowing for access directly from St James's Road. The majority of the remaining plant is located at basement level and roof level.
19. The Southern block (Block C) would also have Class E(g)(iii) use on the ground floor accessed off St James's Road. 7 storeys of residential floors providing social rented units would sit above this. The residential entrance to Building C and associated cycle and refuse store is also access off the newly created pedestrian route.

20. The retained Roca building would provide an E(g)(iii) class unit (35sqm) and a community room (33sqm) on the ground floor. The existing Live/work unit in the Roca building would be retained. The community space would be available for both residents of the development, the wider community and local businesses (local businesses would need to hire the space).
21. The new east-west route will create a new walking route through the site, allowing for future connectivity to Six Bridges Park when this is developed. Until then, the route will terminate at the western site boundary. 'Play along the way' is incorporated into the landscape, making this an active route for children, and seating areas are also provided. The scheme has been amended following discussions with the applicant and a new play area is proposed on the western end of the site adjacent to the Roca Building. This would be used for the new residents and open to the public.

**Plan: Proposal within indicative AAP masterplan showing connecting to Six Bridges**



22. A landscaped courtyard on the podium level will provide communal amenity space and playspace for all of the new homes. Access to this space will be from the first floor levels of buildings A and B, which would be accessed via the circulation cores. A smaller communal roof terrace is proposed on the top floors of Buildings B and C.
23. The scheme has also evolved to provide at least 10% of affordable workspace on the ground floor level, located in the northern block. The development is car-free, but provision of 5 disabled bays are proposed. Servicing and 5 disabled parking spaces are provided within the ground floor of the podium block, accessed from St James's Road.

- 24. The building will be finished in a range of bricks, with different colours and tones used to differentiate uses within the development, breaking the building in to smaller elements, each with a clear identity. The most widely used bricks reflect the predominance of London Stock brick in the area, but white and green glazed bricks are also proposed. Feature panels are proposed on each building to reinforce the unique identity of each part of the building.
- 25. In terms housing provision, there would be total of 153 homes proposed: 30 social rented units (117 habitable rooms), 19 intermediate units (47 habitable rooms) and 104 private (market) units. The existing Live/work unit in the Roca building would remain as it is but is not included in the net increase in housing provision in this instance.
- 26. The residential element of the scheme are located on the upper levels. The proposed mix of dwellings are:

	<b>Number of units</b>	<b>Percentage (%)</b>
Studios	8	5.2
1 bedroom unit	46	30.1
2 bedroom unit	66	43.1
3 bedroom unit	31	20.3
4 bedroom unit	2	1.3
<b>Total</b>	<b>153</b>	<b>100</b>

### **Revisions and amendments**

- 27. Negotiations were undertaken following review of the application and comments made by consultees. Officers requested that the scheme not rely solely on the new pedestrian route to provide playspace. As such, the main amendment comprised the removal of the extension to the Roca building. This has been replaced by a separate play area/courtyard. Some of the playspace would also be provided on the roof of Building C and this has been amended by extending the lift and stair enclosure so that there is lift access to the roof (adding a railing to the inside of the parapet to give sufficient safety)
- 28. Amendments and clarifications were also sought to ensure the bricks are of high quality. Minor changes are proposed to the ground floor elevation to ensure high quality and tenure blind design. The building line of the building on the upper floors have also stepped further back. In line with the changes detailed above, revised documents regarding elevations, and floor plan drawings were submitted along with revision to various supporting documents..

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

- 29. This application was subject to two rounds of formal consultation. The first round was for the original scheme with the extension to the Roca Building (May 2021). A second round was undertaken following the submission of amended plans (September 2022).

30. At the time of writing, a total of 69 consultation responses had been received from members of the public and local businesses and organisations. Given that there were two rounds of consultation, some of these are from the same occupiers. 65 of the responses are against the proposed development.
31. Objections  
The main issues raised by residents objecting to the proposed development (both original residential and amended commercial only) are set out below:
  32. Land use - Loss of industrial land. Once one site is developed all of the other surroundings sites will also be redeveloped for residential uses forcing previous occupiers out of London.
  33. Officers' response: The principle of land use has been explained in the main body of the report. The Class E(g) light industrial use would be compatible with the surrounding uses. There is a marginal loss of industrial space, but the density and jobs created would be increased. The internal servicing yard has not been included in the floorspace, but if it is then this would not lead to any loss. The quality of the space would also be improved. This area is identified for redevelopment with introduction of residential uses.
  34. Height and massing – The development is too tall for this area and would not be in keeping with the area. It will be out of place and character to the local neighbourhood, as well as will be too imposing on all other lower-rise homes and gardens already in the area. It represents overdevelopment of the site. The scheme has been amended to increase the height of the building and the developers have not listened.
  35. Officer response: As outlined above, the height does exceed the AAP strategy for tall buildings, but helps to provide that transition for the taller buildings coming forward in the site allocation. The applicant has made amendments to increase the height of the Building C only slightly to provide lift overrun to the communal roof terrace. This is not a significant increase in height.
  36. Heritage – With no Environmental Impact Assessment, it does not demonstrate alternative options or mitigate effects on neighbouring heritage assets.
  37. Officer response: The scheme would make improvements to the retained Roca building.
  38. Overshadowing – The height of the buildings would mean overshadowing of gardens and neighbouring buildings. There would be loss of daylight and sunlight. The tall buildings will also overlook the courtyard of a nearby primary school.
  39. Officer response: As discussed below in this report, the submitted analysis demonstrates that there would not be significant adverse impacts on the daylight and sunlight to neighbouring areas.

40. Impact on resident's amenity – There will be loss of privacy to neighbouring residents and businesses. Noise and disruption during the construction phase. Cumulative impact of this development and recently built developments impact on neighbours' livelihoods. Refuse collection from such massive building is a great concern and would create odour, noise, air concerns to Culloden Close. Glare on neighbouring residents.
41. Officer response: As discussed below in this report, mitigation measures would be in place to minimise adverse impact on neighbour's amenity. Construction impacts will be covered by the Construction Environmental Management Plan (CEMP) and would be reviewed by the council's Transport and Highways team and EPT. A condition on glare could be imposed to minimise impact.
42. Transport and traffic- The proposed development would lead to increase in traffic and pollution and the site is not close to an underground station. This would lead to increase in parking and congestion in the area. There are not enough busses at the moment to carry the commuters
43. Officer response: There would be less car trips to the site than the existing use (when it was occupied). The scheme is car-free and no new occupants would be eligible to apply for a parking permit. The delivery and servicing management plan would detail the servicing needs and operation. A contribution towards improving bus infrastructure would be secured.
44. Impact on existing businesses - The proposed use of 330 St James Rd as access to serve the development with vehicle and cycle parking is of serious concern to the residents of 330 St James Rd. This would in effect make that private courtyard a public thoroughfare with the associated issues of loss of privacy, concerns of security, bad parking causing disruption, pollution, damage to property and access for the businesses and emergency vehicles. With the expected footfall, there is also serious concerns about pedestrian safety especially with bin lorries reversing in such a space. There will be an impact from the building works on the existing businesses and unable to continue working in this location as it seems that access to the site will be via the shared yard, the destruction of existing property will disrupt business extensively. It would overshadow the business properties to the south and will consequently render them useless for the artistic community who occupy them effectively driving them from the area. Request that the daylight/sunlight implications be properly assessed. Question how construction can take place with adjoining buildings so close.
45. Officer response: This scheme has now been amended so that the yard behind the Roca building will no longer be used for servicing or access. This would now be a play area and would not rely on access from the shared yard. A Construction Logistics Plan (CLP) and a CEMP would plan the route and movement of any construction vehicles.
46. Infrastructure - strain on surrounding infrastructure and resources (health and schools). Limited bus network to support new residents. There should be provision of green spaces. The proposed play street and community room is inadequate for family's needs. The water pressure would be reduced.

47. Officer response: The development would be liable for Mayoral CIL and would make s106 contributions towards a cycle docking station and carbon offsetting projects.
48. Environment - the proposed flats will be out of scale for the area, in turn effect quality of life, and in particular increase environmental problems. It would create an area without sufficient natural ventilation for the surrounding residents. The local storm /drainage system would not be able to accommodate the further high-rise building development. It would have an impact on ecology.
49. Officer response: The submitted wind and microclimate report demonstrates no significant impact on pedestrian comfort with the mitigation measures proposed. The applicant has submitted a drainage strategy and the development proposes SUDS. The scheme would have an overall biodiversity gain.
50. Other – Lack of consultation. There should be consideration of planning consents granted in the neighbouring sites and how this would all impact on neighbours. The development detracts greatly from what is the updated proposal for site OKR11 Southwark Action Plan, 2020 edition. It would appear the developers have bought the strategic plots and overlooked the others leaving them to remain neglected and ignored. The high density would lead to increase in the spread of natural diseases. Fire risk would be elevated to an unacceptable levels taking into consideration of extreme difficulties in firefighting, ladder rescue and escape route for Culloden Close. All of these developments are not for local and young families with affordable living. The development should be marketed and restricted to UK citizens for ownership and a required owner/occupancy rate exceeding 75% or some other high threshold. Devalue neighbouring properties. Injunctable Right to Light.
51. Officer response: The applicant carried out online consultation due to COVID-19. The Local Planning Authority also carried out the statutory consultation. A fire strategy has been submitted. The scheme would provide policy compliant affordable housing. It is not possible to require a developer to market and sell only to UK citizens under the terms of the Planning Act. Right to Light issues are not material planning considerations.
52. Support  
Four responses are supportive of the development and a summary of their responses are set out below:

This redevelopment will benefit the area by providing more housing where it is much needed. This could particularly benefit young people looking to find homes locally and families who are in unsuitable accommodation and need to move. As long as this is managed well, it could be a greatly advantageous to the community. The development would provide much needed affordable homes in this area. This part of Bermondsey is woefully underdeveloped. What that means is that low-density areas like this need to take on more density. The design looks like it responds to the history of the area and the building would be good landmark at the entrance to St James Road. It is good to see that the developer has considered

outdoor space for residents and is providing more industrial capacity than there already is, which will help local businesses stay in the area.

## **KEY ISSUES FOR CONSIDERATION**

### **Summary of main issues**

53. The main issues to be considered in respect of this application are:
  - The principle of the proposed development in terms of land use;
  - Provision of housing;
  - Housing mix and density;
  - Residential accommodation;
  - Outdoor amenity space, children's play space and public open space;
  - Affordable workspace;
  - Design, layout, tall building, heritage assets including views;
  - Public realm, landscaping and trees;
  - Impact of proposed development on amenity of adjoining occupiers and surrounding area;
  - Transport;
  - Noise and vibration;
  - Sustainable development implications;
  - Ecology;
  - Air quality;
  - Archaeology;
  - Fire safety;
  - Water resources and flood risk;
  - Land contamination;
  - Equalities and human rights;
  - Statement of community involvement.

### **Legal context**

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

### **Equalities**

56. 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 considered this 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.
57. 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.
58. 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.
59. 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

60. Proposed enhancements to the streetscape on St James's Road would prioritise the movement of pedestrians and promote “healthier, active lives” in accordance with draft Policy AAP 10 of the draft OKR AAP.
61. The proposed development would provide a mix of uses including residential, commercial unit, community room and play space. The homes, commercial and community facilities in the scheme would be provided to modern design standards, including compliance with the regulations on accessibility. In addition, all homes would be built to accessible standards as a minimum and 10% would be wheelchair accessible. The proposed development would generate additional opportunities for local employment. Furthermore, the 10% Affordable Workspace proposed will be secured through the S106 Agreement.

- 62. The proposal would be designed to ensure safety and security is maximised to reduce any potential for crime. Linkages into and sightlines across the site would be improved and buildings will be designed to meet Secure by Design standards, as discussed later in the report.
- 63. The proposal includes the provision of new public realm and public play area, which would increase the level of high-quality open space available in the area. This feature will have a number of positive benefits, especially for younger people and those on lower incomes who may not be able to access more formal organised physical activities. This opportunity for recreation encourages more active lifestyles, which would improve health and quality of life in addition to encouraging social integration and community cohesion.

### Conclusion on equality impacts

- 64. 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 improved commercial in E(g)(iii) Use Class as well as residential 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**

- 65. Due to the scale of the scheme, a request for a formal screening opinion to determine whether the development constitutes an Environmental Impact Assessment (EIA) development as defined by the Town and Country Planning EIA Regulations 2017 was submitted to the council in December 2020.
- 66. The request (Ref: 20/AP/3797) was considered under Schedule 2, 10(b) Urban Development Projects of the EIA Regulations, as the proposals exceed the threshold of more than 150 residential units identified within Schedule 2 (10b). It was considered that no significant likely effects were identified and accordingly the conclusion reached is that the proposed development would not be likely to have significant effects upon the environment by virtue of factors such as its nature, size or location. The proposed development is therefore not considered to constitute EIA development.

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

- 67. London Plan Policy SD1 encourages Opportunity Areas to optimise residential and non-residential output and density and contribute towards meeting (or where appropriate) exceeding the minimum guidelines for housing and/or indicative estimates for employment capacity. The Old Kent Road Opportunity Area (OKROA) is identified within the London Plan as having an indicative employment capacity of 5,000. Policy GG2 of the London Plan outlines the potential to redevelop on brownfield sites within opportunity areas.

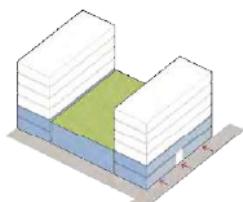
68. Area Vision 13 (AV.13) Old Kent Road Area Vision of the Southwark Plan 2022 sets out the overall vision for the Old Kent Road. The policy says development should:
  - Deliver direct benefits to the existing community including new and improved homes including new council homes, schools, parks, leisure 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.
69. AV.13 Old Kent Road Area Vision also states that the Old Kent Road Area Action Plan (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 AAP 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.
70. The Site allocation NSP67 and the Draft OKR AAP has an indicative minimum capacity for this site allocation OKR 11 'Marlborough Road and St James's Road' to provide 1,200 new homes and over 740 new jobs. In addition, it states that redevelopment should provide new homes; and replace existing employment floorspace and provide a range of employment spaces, which is consistent with the building and land use types shown in the Sub Area 2 Building Typology and land uses. There are two types of land use envisaged on this site - Small industrial units and small studios and offices. Redevelopment of this site allocation should also provide a new park between the Selco and Six Bridges estate sites.

**Image: OKR Sub Area 2, showing Site Allocation OKR11, Building Typologies and Land Use**



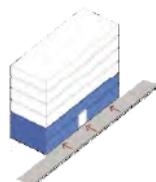
**HORIZONTAL/VERTICAL MIX: Small industrial units**  
Double height spaces of 6-8m can be accommodated within the centre of blocks. Units would typically be 150-200m<sup>2</sup>. Blocks can be wrapped within two storeys of workspace that can be used for offices, showrooms and studios. Basement levels should be utilised to accommodate residential servicing, storage or commercial uses where appropriate.

**Suitable uses:** Light industrial uses and maker spaces within the central space.



**VERTICAL MIX: Small office and studio**  
Workspace will be provided at ground and first floor. Ground floor ceiling heights should be a minimum of 4m. Basement levels should be utilised to accommodate residential servicing, storage or commercial uses where appropriate.

**Suitable uses:** Artists' studios and office space.

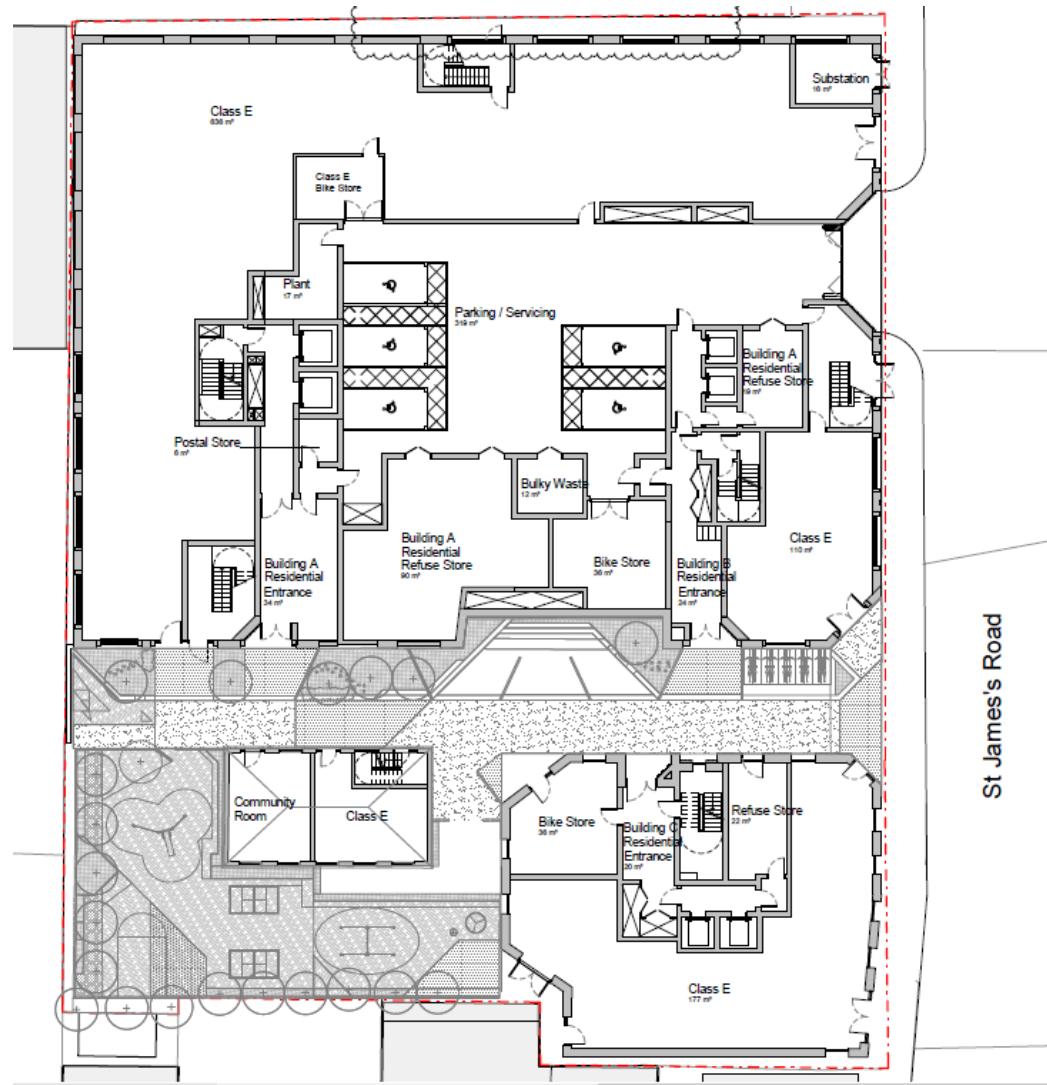


71. Whilst, the site was used as a storage and distribution company (Class B8), light industrial and office spaces, the existing uses within those buildings on site is not considered to optimise the potential of this Opportunity Area Proposal Site. It is anticipated that the scheme would deliver major regeneration benefits that are discussed in the proceeding parts of this report.

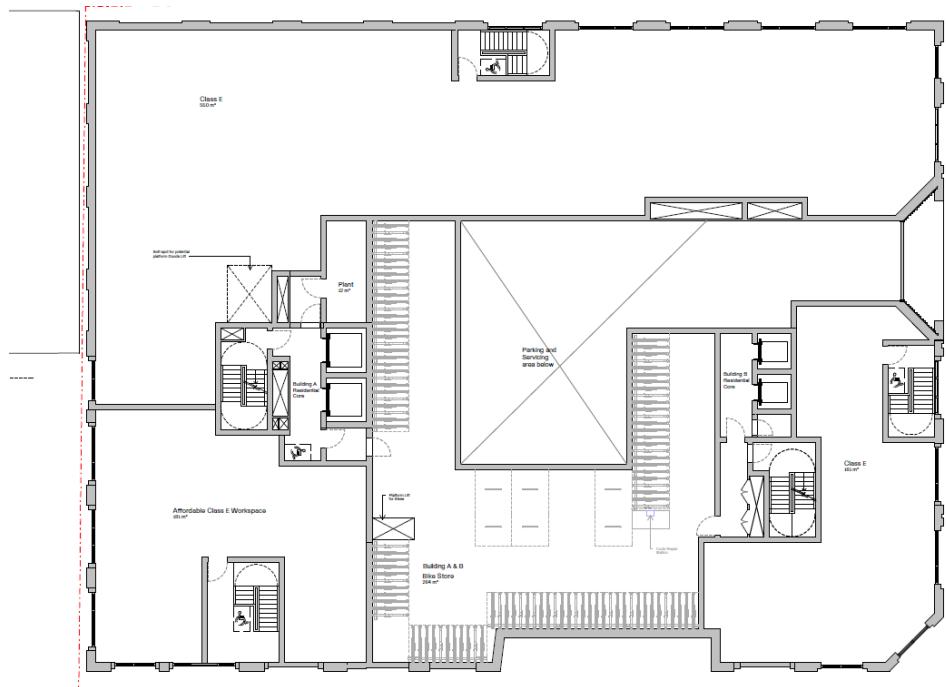
## Employment re-provision

72. The current use on the site is a mix of office, workshops (Class E) and warehouse (B8). The site is no longer protected in terms of strategic industrial land following the adoption of the Southwark Plan 2022. Notwithstanding this, the re-provision of improved employment space including provision of residential homes would meet the objectives of the vision set out in the AAP.
73. The proposed re-development of the site would introduce a mixed commercial and residential building comprising of 1,615sqm of Use Class E(g)(iii) light industrial floorspace, 285sqm of Use Class E(g)(i) office floorspace and 153 residential units. The 1,615sqm of Class E(g)(iii) is aimed at light industrial, maker and workshop spaces, which is considered to be acceptable on this site and location. The extant office space on site would be re-provided (285sqm). The building typology envisaged by the draft AAP would see small industrial units, small office, studios, and ground and first floor levels. The proposed scheme would deliver this. There is a slight shortfall of overall non-residential floorspace (from 1,945sqm to 1,900sqm). However, this does not include the internal servicing yard (319sqm). If this was added, there would not be any shortfall. When compared to the previous B8 use the density of the use would be increased in an improved layout and new quality buildings. The density of the use would be increased in an improved layout and new quality buildings. A s106 planning obligations would require all of the workspace to be fitted out with lighting, heating, cooling, toilet and kitchen facilities, and provision for a three phase electricity supply to a specification to be agreed with the council. The fit out of the commercial to this agreed specification would need to be completed prior to the occupation of the residential units and this would be secured by condition. In addition, all of the workspace would need to be fully sprinklered to ensure fire safety within this mixed-use development. A further condition would require details of the routing of residential soil stacks through the ground and first floor commercial spaces to ensure that these would not be run along the ceiling soffits of those spaces, as that would make the spaces more difficult to let.

**Image: Proposed ground floor**



**Image: Proposed first floor Block A and B**



### Job creation

74. The current building is vacant and from the submitted Social Value Statement, the development provides uplift in employment space, and could potentially deliver 47 full time employees. The council's Local Economic Team (LET) advised that a development of this size and with the proposed employment densities would be expected to deliver 32 sustained jobs to unemployed Southwark residents, 32 short courses, and take on 8 construction industry apprentices during the construction phase. The LET supports the application. If any of these expectations were not to be achieved, financial contributions would be sought in accordance with the council's Planning Obligations and CIL SPD. An Employment, Skills and Business Support Plan would also be secured through the S106 Agreement.

### Affordable workspace

75. Policy P31 (Affordable Workspace) of the Southwark Plan includes a requirement for development proposing over 500sqm of employment space to include 10% of the proposed gross new employment floor space as affordable workspace on site. The affordable workspace should be secured for at least 30 years, respond to local demand and prioritise existing businesses.
76. The proposed development would deliver 1,900sqm of improved employment floorspace and therefore proposes 201sqm of affordable workspace, equating to 10.5% of the total floorspace. Following discussions with the applicant, this

affordable workspace would be located on part of the ground and mezzanine levels under Building A and it would have its own entrance and cycle store. This space would be secured for 30 years and for a rent of £12 per sqft (inclusive of service charge, insurance and VAT). This is below the market rent, is considered appropriate, and is comparable to those levels that have been agreed on other sites in the Old Kent Road area. The employment space has been designed to be flexible so that it could accommodate a range of different unit sizes and shared workspaces. Details of a specialist workspace provider could be secured through a s106 planning obligation. In addition, the S106 obligation regarding fit out discussed above would also apply to of the affordable workspace.

### Provision of housing, including affordable housing

77. The scheme would provide 153 new residential units, including policy compliant affordable housing comprising social rented and intermediate units in terms of habitable rooms. There is a pressing need for housing in the borough. London Plan Policies GG4 and H1 reinforce the importance of delivering new homes setting a 10-year target of 23,550 new dwellings for Southwark. This is echoed by policy in the New Southwark Plan and draft OKR AAP. Specifically Policy ST1 Development targets of the New Southwark Plan states that we will work with our partners, local communities and developers to ensure that developments deliver the required growth and improvements to achieve our targets including 40,035 homes between 2019 and 2036 (2,355 new homes per annum). Similarly, the draft OKR AAP sets out the phased delivery target of 20,000 homes. More details of the affordable provision is discussed further below.
78. The community room proposed within the retained Roca building would serve as a communal amenity space for the future residents. However, this can also be opened up for the use of the local community groups via a booking system and details of this would be secured in the S106 agreement.

### **Prematurity**

79. Legal Advice received in relation to this issue highlights the following from the National Planning Policy Guidance:
80. “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:
81. 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.

82. The most up to date adopted development plan documents pertinent to the Old Kent Road are the 2021 London Plan, and Southwark Plan 2022. These identify the Old Kent Road Opportunity Area as having significant potential for housing and employment led growth. The draft OKR AAP has been developed in response to this adopted plan (and its previous iteration London Plan 2016) and has sought to address the increased housing target for the opportunity area and the need to ensure that the London Plan aspirations for industrial land and employment are addressed. The scheme under consideration here is not considered to undermine either the strategic or the 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 premature.

### Conclusion on land use

83. The scheme would deliver major regeneration benefits, including a significant contribution to the borough's employment targets, inclusion of affordable workspace, the introduction of high quality commercial floorspace and much needed housing. It is therefore considered that the development, in land use terms, is acceptable, and its contribution to Site Allocation OKR11 and the surrounding Opportunity Area should be supported.

### **Affordable housing and development viability**

84. The NPPF requires affordable housing as part of major residential developments. Policy H4 (Delivering affordable housing) of the London Plan sets out the strategic target that 50% of all new homes delivered across London are to be genuinely affordable. Policy P1 of the Southwark Plan (2022) requires development that creates 10 or more homes to provide the maximum viable amount of social rented and intermediate homes and the minimum amount should be 35%.
85. The New 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 total, the development would provide 467 habitable rooms. The development would provide 30 social rented units (117 habitable rooms), 19 intermediate units (47 habitable rooms) and 104 private (market) units. This would equate to 25% of social rented habitable rooms and 10% of intermediate habitable rooms and would therefore accord with Policy NSP P1. The development would provide a total of 164 affordable habitable rooms, which would equate to an overall provision 35.1%. The level of provision is therefore acceptable and policy compliant.

86. Table tenure mix

Tenure	Studio	1-bed	2-bed	3-bed	4-bed	Total homes	Hab rooms (Units)	Hab rooms (%)
Proposed social rent	0	11(xhr)	2(xhr)	15(xhr)	2(xhr)	30	117	25.1%
Proposed Intermediate	0	10(xhr)	9(xhr)	0	0	19	47	10%
Market sale	8(xhr)	25(xhr)	55(xhr)	16(xhr)	0	104	303	64.9%
<b>Total</b>	<b>8</b>	<b>46</b>	<b>66</b>	<b>31</b>	<b>2</b>	<b>153</b>	<b>467</b>	<b>100</b>
Percentage	5.2	30.1	43.1	20.3	1.3			

**Affordable housing  
(by hab room)  
35.1%**

## Development viability

- 87. As mentioned in paragraph 53 above, London Plan Policy H4 sets a strategic target of 50% affordable housing onsite. The policy sets out parameters for fast track routes that will not require a viability assessment and stipulates that fast track applications will be subject to review mechanisms if development is not commenced within two years. The fast track approach is also reflected in NSP policies.
- 88. NSP Policy P1 states that all applications require a viability appraisal except where development that provides 40% social rented and intermediate housing affordable housing, with a policy compliant tenure mix, (a minimum of 25% social rented and a minimum of 10% intermediate housing) as set out in Table 1 (of Policy P1) with no grant subsidy. In this instance, an affordable housing provision of 35% is proposed and therefore a Financial Viability Assessment is required.
- 89. The council's consultant has reviewed the Financial Viability Assessment prepared on behalf of the applicant and following discussions with the applicant on this matter, it was concluded that the proposed scheme generates a residual land value (RLV) of £4,979,000 (build cost £39,840,000). This follows the requirement to install comfort cooling units within each flat, following a thermal assessment of the residential accommodation, which could amount to circa £700,000. This adds to the build costs.
- 90. Due to the increased build costs, the RLV of £5 million would be the same as the council's calculated benchmark land value. On that basis, the councils FVA concludes that with the provision of 35% affordable housing there would therefore be no surplus generated by the scheme. As such, the scheme cannot support any additional affordable housing on this site. A condition will be attached to any planning permission to ensure that these cooling units would be installed as required by the thermal assessment.

## Conclusion on affordable housing

91. 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 years of the permission being granted. This will be secured through the S106 Agreement.

## **Housing mix, density and residential quality**

92. New 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 site. The policy also requires two bedroom homes as a mix of two bedroom 3 person and two bedroom 4 person homes.
93. The provision of residential accommodation on the site is as follows.

Table: Housing mix

<b>No. of bedroom/persons</b>	<b>No.of units</b>
<b>One bedroom 1 person</b>	8
<b>One bedroom 2 person</b>	46
<b>Two bedroom 3 person</b>	34
<b>Two bedroom 4 person</b>	32
<b>Three bedroom 4 person</b>	13
<b>Three bedroom 5 person</b>	18
<b>Four bedroom 5 person</b>	0
<b>Four bedroom 6 person</b>	2

94. At 5.2%, the proposed proportion of studio units is just marginally above the policy maximum of 5%. This is only very marginally and would only be in the private tenure. The proposal would also provide more than 60% of two or more bedrooms (at 64.7%). The number of units that have three or more bedrooms would be 21.6%, above the policy minimum. The 4 bed units were added at the request of officers during negotiation with the applicant.

## **Wheelchair accommodation**

95. The proposed development would provide 15 wheelchair residential homes (i.e. M4(3)), equating to 9.8%. However, in terms of habitable rooms, this would equate to 53 rooms – 11.3%, which exceeds the 10% requirement of Policy D2 of the London Plan and P8 Wheelchair accessible and adaptable housing of the New Southwark Plan. The remaining housing would meet the M4 (2) standard by being accessible and adaptable. Amendments had been requested with changes to the layouts to ensure that the social rented wheelchair units would meet the minimum sizes set out in Policy P8. Furthermore, a condition would be imposed to ensure this would be complied with. The wheelchair housing would be distributed across the unit sizes.

96. This would be split into the following tenures:

- 3 x Social rented
- 2 x Intermediate
- 10 Private

97. Wheelchair housing mix

Unit size	Number
<b>1 bed</b>	2
<b>2 bed</b>	9
<b>3 bed</b>	4
<b>Total</b>	<b>15</b>

98. The social rented units would be required to be fully fitted for first occupation, with private units being adaptable. Subject to the inclusion of the wheelchair clauses in the s106 agreement, the wheelchair housing mix would be in accordance the relevant policies.

## Density

99. Southwark Plan 2022 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

100. This approach is consistent with the London Plan, within which policy D3 refers to optimising site capacity through a design led approach.

101. 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.

## Residential design quality

102. 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 New 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

103. P15 of the Southwark plan requires developments to meet the minimum national space standards. Following discussions with the applicant, revised plans have been submitted. 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.

#### Dual aspect

104. The percentage of dual aspect units would be very good at 76.6%. Those units that have single aspect are not solely north facing.

#### Number of units per core

105. The Mayor's Housing Design SPG requires that each core should be accessible to generally no more than eight units on each floor. There would be no more than eight units per core. In blocks B and C where the majority of the affordable homes are, there would be between three to six flats on each floor, which is a positive aspect of the scheme and well within the guidance of the Mayor's Housing Design SPG.

#### Internal daylight

106. A daylight and sunlight report based on the Building Research Establishment (BRE) Guidance has been submitted which considers daylight to the proposed dwellings using the Average Daylight Factor (ADF). ADF is a measure of the overall amount of diffuse daylight within a room. It is the average of the daylight factors across the working plane within a room. ADF determines the natural internal light or daylight appearance of a room and the BRE guidance recommends an ADF of 1% for bedrooms, 1.5% for living rooms and 2% for kitchens. This also adopts an ADF of 2% for shared open plan living room/kitchens/dining. The assessment includes the extension approved to the north at Chevron apartments.
107. The revised BRE guidelines was published in June 2022. It affects the proposed units' internal daylight and sunlight calculations (the ADF approach to assessing levels has been removed, although the ASPH test is retained, and there is no change to assessing the impact on neighbouring properties). Having to comply with the latest guidelines would require a complete reassessment of the flats. It should also be acknowledged that this application has been in since May 2021 (well before the revised BRE guidelines were published) and is at a late stage that some flexibility should be given.

108. In terms of sunlight, the BRE recommends that the Annual Probable Sunlight Hours (APSH) be used. The BRE guidance states that a building where sunlight is required will be reasonably lit where:

"...at least one main window wall faces within 90° of due south

...the centre of at least one window to a main living room can receive 25% of annual probable sunlight hours, including 5% in winter months between 21 September and 21 March. Where groups of dwellings are planned, site layout design should aim to maximise the number of dwellings with a main living room that meets the above recommendations".

109. Block A

For Block A, only levels 1 to 8 have been tested, as they represent the areas where lowest daylight and sunlight levels might be experienced. The ADF analysis results show 154 of the 172 rooms tested meet or exceed the BRE guidelines targets, which represents a 90% adherence rate. Of the 18 rooms falling below the BRE guidelines, 15 of these are bedrooms with ADF levels ranging between 0.34% and 0.99%, with the remaining 3 living/dining rooms obtaining ADF levels ranging between 0.77% and 1.48%. Whilst these do fall short, it is considered that the levels do not fall significantly short of the target levels in an inner London urban location. Furthermore, the BRE guidance suggests that daylight within bedrooms are less important as they are used for sleeping.

110. In terms of sunlight availability, the APSH assessment shows that of the 172 rooms tested, 103 (60%) meet or exceed the annual sunlight target as suggested by the BRE Guidelines. It is noted that the majority of the rooms not meeting the guidelines for sunlight are bedrooms so it is not considered that this would be such poor condition. Those living rooms that do not meet the target levels are mainly to the one bedroom or studio flats.

111. Block B

The ADF results show 35 of the 38 rooms tested meet or exceed the BRE guidelines targets, which represents a 92% adherence rate. It is noted that those 3 rooms that do not meet the target are bedrooms with ADF levels ranging between 0.96% and 0.99%, so only just below the 1.0% ADF target.

112. In terms of sunlight, the ASPH assessment shows that of the 38 rooms tested, 27 (71%) meet or exceed the annual sunlight target as suggested by the BRE Guidelines. Those that fail the annual probably sunlight hours are bedrooms, which are considered less important.

113. Block C

The ADF results show 84 of the 91 rooms tested meet or exceed the BRE guidelines targets, which represents a 92% adherence rate. The rooms that do not meet the target are mainly kitchens. Whilst these require the highest ADF levels, it should be noted that the levels do not fall significantly short, and would be considered acceptable in this urban context.

114. In terms of the APSH assessment, it shows that of the 87 rooms tested, 66 (76%) meet or exceed the annual sunlight target as suggested by the BRE guidelines. Those that do not meet the targets are mainly kitchens and living rooms, but it

should be noted that these rooms are set back from the building footprint to accommodate an inset balcony, which reduces the level of light to the room they serve. It is considered on balance, acceptable in this instance.

115. It is considered that this development would achieve a relatively high degree of BRE compliance and the units would have good levels of daylight and sunlight.

### Overlooking

116. The proposed blocks are designed to limit direct overlooking by positioning the windows in appropriate places and avoiding habitable windows facing each other across the podium courtyard. The existing buildings adjoining the site are predominantly industrial and therefore no privacy issues raised. To the north of the site is the Chevron apartments. The design of the scheme takes into account those existing windows and any potential windows that are proposed in the scheme under planning application ref 19/AP/6395. The position of the proposed building windows would limit direct overlooking into the new windows of the Chevron apartments.

### Outdoor amenity space, children's play space and public open space

117. 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 10 sqm per child bed space (covering a range of age groups). In addition, P15 of the New Southwark Plan requires the provision of 5sqm of public open space per dwelling within the Old Kent Road Opportunity Area (subject to the detailed requirements of the AAP masterplan).

118. In terms of the overall amount of amenity space required, the following would need to be provided:

- 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: ten sqm of children's play space for every child space in the development as required by the London Plan.
- Public open space: five sqm of public open space per dwelling as required by the draft OKR AAP. Some developments are required to provide open space within their sites as set out in the AAP masterplan, others to make a financial contribution.

### Private amenity space

119. All of the 153 proposed flats have been provided with private amenity space in the form of balconies. All of the two, three and four bedroom flats have been

provided with at least 10sqm of private amenity space, which meets the policy expectation of at least 10sqm. All one-bed flats have been provided with at least 7sqm of private amenity space. All studio flats have been provided with at least 5sqm of private amenity space.

120. In line with the requirements of the policy, there would be private amenity space shortfall equalling 70sqm. 10 x one-bedroom units have a 3sqm shortfall, 8 x studios have a 5sqm shortfall. This will be added to the communal requirement as detailed in the below paragraphs.

#### Communal amenity space

121. Where the full recommended provision of 10sqm per residential unit has not been provided, the shortfall has been added to the communal requirement. The shortfall is 70sqm, which means a total of 120sqm (70sqm plus 50sqm) of communal amenity space would be required. The podium courtyard in the northern block would provide for 65sqm of communal amenity space. The roof terrace on Block B would have 61sqm of communal amenity space, totalling 126sqm for the whole site. This exceeds the policy requirement. All tenures would have access to this podium space and it is expected that the social rented tenants within Block C would have fob access to this podium level.

#### Children's play space

122. 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**

		<b>Under 5s</b>	<b>5-11</b>	<b>12+</b>
<b>Existing provision</b>	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
<b>No existing provision</b>	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

123. 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). This results in 582sqm of playspace being required across the whole site. The scheme proposes to provide 587sqm, ensuring that the playspace requirement would be met on site. This would be provided within the ground floor courtyard, the podium and the roof space on Block C. In addition to this, playable space is provided in the new pedestrian route to encourage 'play along the way'. This playable public realm is in addition to the minimum playspace requirement and is a positive benefit of the proposal.

**Image: Communal and playspace distribution**

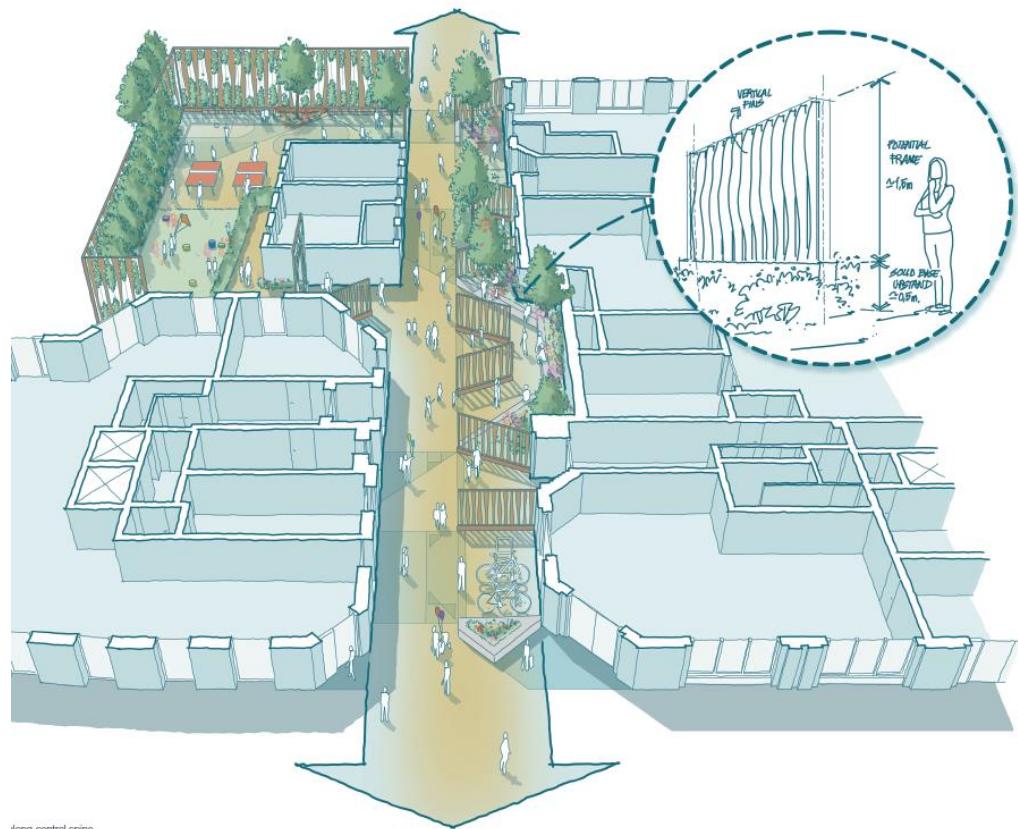




Surplus Communal amenity space

124. There would be varied types of playspace proposed including lawn space for recreation, scramble space with timber clad play and gathering space with bouldering holds/grips and places to sit, climb, scramble and jump and areas for more prescriptive play. Policy AAP10 “Design” of the OKRD AAP requires as a minimum that play spaces should contain provision for wet play, sand play, space to grow food and plants and sufficient seating. These will all be secured by condition. The courtyard area behind the Roca building would be predominantly geared for older age group. This would be open to both the future residents and the surrounding residents. It is anticipated that this ground floor play area is locked at certain times (at night) to ensure safety of the residents. Perforated and permeable screens are proposed surrounding this play area to allow visibility through to the new pedestrian route. Details of these playspaces would be secured by a condition.
125. The new route is the spine of the development and places pedestrians first by providing access to the new homes and access to the community room and playrooms.

**Image: Spaces along the pedestrian route**



## Public open space

126. 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 latter instance, those sites 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.
127. 153 homes would be provided resulting in a requirement for 765sqm of public open space. This site is not identified within the AAP as providing public open space. The applicant has agreed to make the contribution of £156,825 based on the 153 dwellings proposed and can be secured by the legal agreement. This excludes the existing live/work unit on the site.

## Overshadowing to amenity spaces

128. Following discussions with the applicant, the open space and amenity space design has been amended to ensure that these spaces would be well lit.
129. The sunlight to these areas when taken as a whole would be improved by the recent revisions to the layout and the inclusion of additional areas of play space at the ground floor, which are now achieving 95% and 100% sunlight on the ground in the month of March, which is double the BRE guideline threshold. There are also two other amenity areas which are exceeding the guidelines for sunlight on the ground. It is considered that the number and variety of spaces which are being made available, and the opportunities for the majority of these to be in sunlight year-round means that this should be considered an acceptable position in terms of sunlight to these external areas.

## **Design considerations**

130. The NPPF stresses 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**

131. 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.
132. The emerging AAP notes that in site allocation OKR11 the Six Bridges Estate will be transformed to a mix of industrial distribution warehouses below new homes, which will directly service central London. Marlborough Grove itself will be partially closed and entirely transformed from a busy service route, to a calm and well-designed public open space. It should have a particular focus on linking the two Phoenix School sites together in a safe and well-designed environment, which incorporates sport and play facilities and wildlife or ecology habitats. A new park will be created encouraging an easy and safe walking route between Marlborough Grove to and St James's Road.
133. The proposed development is split into two sections into north and south blocks with the new pedestrian route providing access to both buildings. A key aspiration of the development is to create an improved public realm for residents and the local community to enjoy. The new east-west route will create a new walking route through the site, allowing for future connectivity to Six Bridges Park when this is developed. Until then, the route will terminate at the western site boundary. An obligation will be included in the s106 agreement to secure this. This end of the pedestrian route would have a variety of uses that would ensure that there would be passive surveillance including the courtyard playspace, the community room and entrances to Block A and the commercial unit.

**Image: Indicative masterplan in the draft AAP**



**Image: Masterplan as proposed**



134. Whilst the layout differs from what was envisaged in the AAP, it is considered that this east-west route would improve permeability through this part of the site and with the future emerging context. The introduction of the pedestrian route between two blocks is considered a benefit of the scheme, the applicant has designed the scheme to retain views of the Roca building from St James's Road, and officers feel that this space would be successful. The public realm improvements and landscaping along this route would also provide buffer/defensible space.
135. The three residential entrances, community room and Class E uses would be accessed from the new pedestrian footpath and following amendments to the scheme at ground floor level there would active frontages as well as refuse and cycle stores. The route would allow for integration of the occupiers in different tenures with good security and surveillance.
136. The building sits on the edge of the red line boundary. This stands slightly forward of the existing building line and this is due to the requirement to re-provide the commercial floorspace and as well as accommodating parking and residential ancillary areas. It should be noted that the block B that fronts St James' Road would have the upper floor set slightly back from the podium level.
137. A parking and servicing area is accessed from St James's Road and this does not dominate the frontage, and provides off street servicing provision for the light industrial space in the main block. The entrance to the space has been tracked to ensure that light goods vehicles can access it from St James Road and it has sufficient head clearance for service vehicles. The proposed playspace in the

courtyard is appropriately located and would function well being adjacent to the community room. The commercial spaces are located in different parts of the blocks maximising activity around the ground floor. Hard and soft landscaping has been considered around the street interfaces of the site.

## **Height scale and massing (including consideration of tall buildings)**

138. London Plan Policy D9 deals with 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.
139. 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.
140. 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 storeys in height. These developments are proposed to be sited in the vicinity of the proposed BLE stations, to mark their citywide 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 storeys 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.
141. The proposed blocks fronting St James’s Road (Blocks B and C) are 7 and 8 storeys in height retrospectively. It is considered that this ‘stepping-up’ in height has been designed deliberately by the architects to fit well within the emerging context in the area. The proposed extension to the Chevron apartments to the

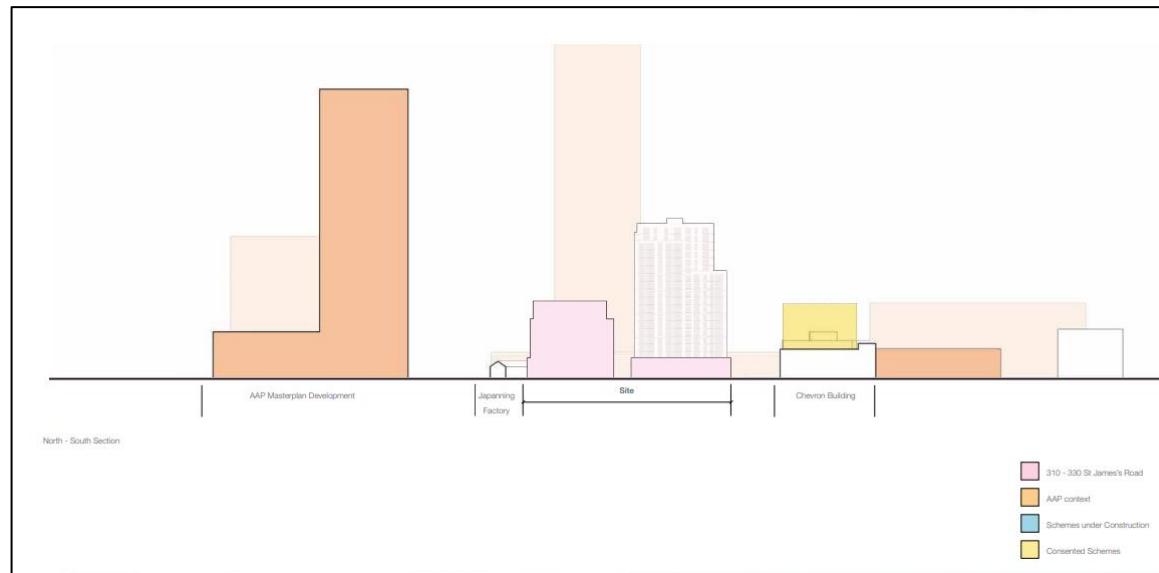
north of the site would result in a 7 storey building and therefore the proposed development follow that step down when viewed from St James's Road.



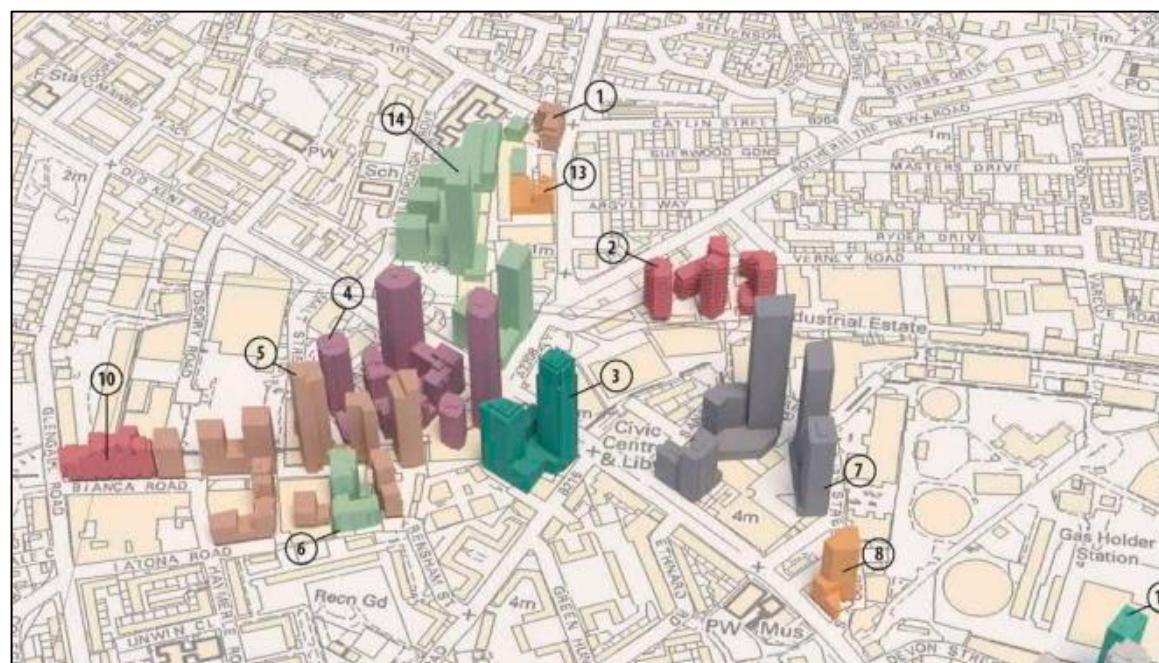
142. Officers acknowledge that the rear block (Block A) at 19 storeys exceeds the height stipulated in the AAP. It should be acknowledged however, the area around Old Kent Road is being redeveloped to form a new cluster of tall buildings; many of these schemes are already consented or under construction. The AAP Masterplan for the Six Bridges Industrial Estate, immediately to the west of the site, includes plans for Tier One buildings (over 20 storeys). The stepping-up of heights within the site, from lower buildings facing St James's Road which are 7 and 8 storeys in height with rooftop setbacks to a taller building on the western boundary at the "rear" of the site , backing onto the industrial estate, which will be replaced with much taller buildings, would mediate the increase of heights. This

stepping down in height would reduce impacts on the smaller scale residential buildings to the east.

### Image: Context Elevation of emerging development



### Image: Emerging schemes in the vicinity (No. 13 is the Chevron Apartments, just to the north of the development site)





143. As can be seen in the images above, the indicative height of the building as outlined in the AAP masterplan shows a significantly taller building proposed to the rear of the site. The development site therefore presents an opportunity to act as a transition site. The image showing the cumulative scenario shows how this area of Old Kent Road would be transformed. The idea of increasing heights from east to west, towards the future centre of the cluster to the south-west of the Old Kent Road, has already been applied elsewhere with the existing Chancellor House (also known as Bermondsey Works, 395 Rotherhithe New Road), which steps up from six to 20 storeys towards Old Kent Road. The proposed scheme at this height would avoid a 'cliff-edge' effect, mitigating the contrasting scale of the future tall buildings in the masterplan by gradually rising in height in incremental steps.
144. As the density of the area intensifies over time, the scale of the built form will sit well within the broader planned heights of the AAP tall buildings strategy of much taller buildings towards the south of the site. The tallest building – Block A - will mark a place of local importance and help assist wayfinding strategically in the short term, and locally in the longer term once the broader future masterplan emerges. Blocks A and B would sit on a podium level and both of these elements have been articulated in various ways, in order to mediate the overall massing of the scheme.
145. One of the clearest distinctions in the overall form is between the double-height podium and Block B; whilst the podium respects and acknowledges the existing street line, the block above is set back slightly and clearly distinguishable from its base. Block A also has various set-backs as it rises above the podium. The block is presented as being comprised of three main elements, which each element further articulated and differentiated through façade design and materiality.
146. Given that the northern elevation of Blocks A and B faces the Chevron Apartments building immediately to the north of the site and the low-rise Victorian terrace beyond further north, the applicant has designed this elevation to be the lower element. There is a setback of Block A before stepping up to a taller mass, which is then terminated at the top by a set-back 'pop-up' which crowns the building. This 'pop-up' device is echoed on Block B, with the top floor of residential accommodation set back from the main building line and effectively crowning the smaller building. The top floors of both buildings are identifiable by their

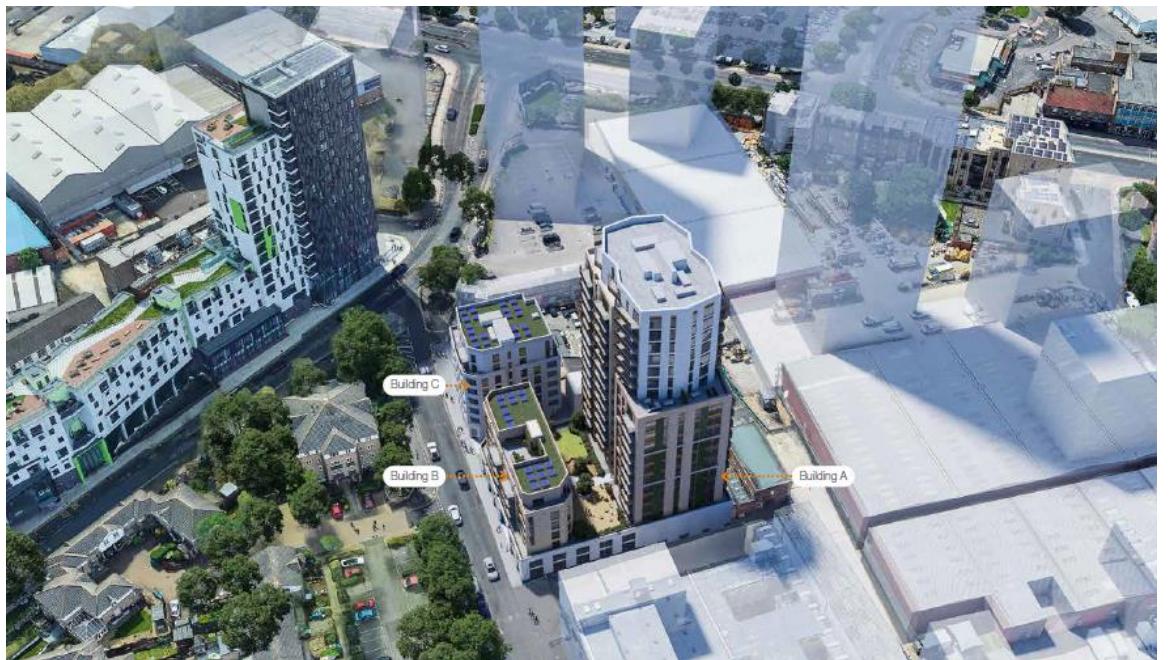
contrasting materials and chamfered corners, and echoed in the treatment of Building C.

147. The elevation design for Block A facing the proposed podium has been developed to enable the building to be read as a group of smaller building elements. This is achieved through the massing, which is broken down through setbacks and chamfers, and is emphasised by the proposed materiality, expressing a shorter mass to the north, a taller mass to the south, and a pop up element that connects the two. The taller and shorter mass elements are broken down further, through vertical grouping - with groupings of four storeys at the lower part of the building, and three storeys for the taller parts of the building; and horizontal groupings of one to two openings with a recessed solid panel. These window groupings are inset from the main facade, with chamfered edges.

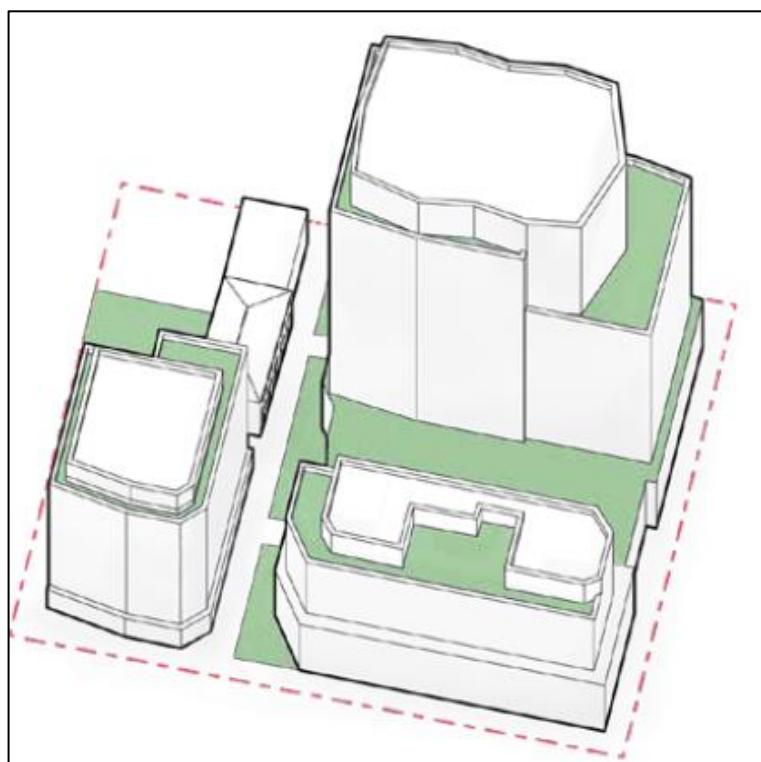
**Image: East elevation looking at Block A from Podium**



**Image: CGI of Proposed development**



**Image: Indicative proposed massing**



148. The massing and design of the proposed development has been considered in relation to the key views of the buildings when travelling north and south along St

James's Road, as well as the site's place within the emerging context as outlined above. This is further discussed below.

149. Southwark's policy on tall buildings also require that it provide a functional public space that is appropriate to the height and size of the proposed building. It should also provide a new publicly accessible space at or near to the top of the building and communal facilities for users and residents where appropriate. The scheme proposes playspace behind the existing Roca building that is for the future and existing residents. The ground floor community room would be mainly for the new residents to use, but this room could also be open to the local community where they could book to use this for local events. An obligation in the legal agreement to secure details on how this room would be publicised and booking systems to be used could be secured.
150. The proposed height is considered acceptable in relation to the emerging context. The buildings would make a positive contribution to the townscape. The predominant brick façade ensures a high quality robust appearance.
151. 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 AAP.
152. The application was accompanied by a Heritage, Townscape and Visual Impact Assessment. The impact on protected views and heritage assets is discussed in paragraphs further below.

## **Architectural design and materiality**

153. 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.
154. The applicant had analysed nearby historical buildings and identified a number of key common features, which would be reflected in the development. These include:
  - a clearly identified building base
  - a clearly defined building 'top'
  - arched openings, often used to emphasise an entrance
  - strong vertical expression, often created using recessed façade.
155. The podium is expressed clearly as an identifiable building base, through setting back the buildings above, and through a change in fenestration type and materiality. The tops of all three residential buildings are also clearly defined. Block A has an inset crown, the external walls of which fold in and out to create an articulated parapet line. The accommodation on the top floor of building B is

expressed as two 'pop up' elements, set back from the building frontage. The top two floors of Block C are set in from the building body, creating a continuous parapet line with Block B for the building body, and reducing the impact of the taller element of the building on the street below.

**Image: CGI of section through Blocks A and B**



156. The buildings have regular rhythms that reflect the historical buildings. Arches are used selectively throughout the development, referencing the historical buildings, and the northern facade of the retained building at 330 St James's Road.
157. Block A has a strong vertical expression, with windows grouped within recessed panels to break down the facade into smaller elements. Blocks B and C are smaller in scale and have a simpler facade arrangement. A blend of inset and external balconies are provided adding articulation to the elevations. A condition will require balcony drainage systems, soffit and railings/parapet details to be agreed.
158. The predominant material would be brick for all of the blocks and these would be of varying tones to provide visual interest, variation as well as differentiating between the blocks. White glazed brick is proposed for the building base - the white tone responds to the white facade of the retained building at 330 St James's Road, and also to the lighter tones of brick at ground floors along St James's Road.

Glazed green ‘socks’ are proposed at the base, grounding the building, and picking up on the green tones used elsewhere in the development. Bronze coloured metalwork is proposed for windows and balconies, which is a tone that will complement the range of brick colours.

159. Building C is a much smaller building form that comes to ground, and as such, the chosen material would express the building as a single form. Larger openings are provided at ground floor, for the commercial use, and the upper floors are punctuated by regular openings, again referencing the regular facade articulation of the historical industrial buildings. Balconies are inset at the corners of the building, creating a pure building form. The balcony parapets are predominantly brick, but gradually reduce in height towards the top of the building, creating variation and interest to the building appearance. The top two floors are inset from the main building body, minimising the impact of the taller element of this building on the street below. The building crown is capped by a reconstituted stone parapet. Glazed brick is used for the ground floor, with green glazed brick base. The upper floors of the building are finished with an off-white coloured non-glazed brick. This achieves a cohesive appearance for the building as a whole, but offers a subtle difference between the ground floor and main building body.

**Image: East elevation**



**Image: West elevation**



160. Historical maps show that there was once a wool factory on the site and this has inspired the name of the development - The Loom Factory. It has also inspired some of the architectural details throughout the scheme, in particular the metalwork on Block B. On the eastern elevation, Block B has a large archway identifying the entrance to the servicing area. The metalwork of the gate within the arch has been designed to reflect spools of woollen thread on a loom - spindles cross over each other, also adding depth and interest to the large gate.

## Elevation: Block B entrance to servicing and metal work referencing the Loom factory

Entrances



161. The regular double height openings with glazing to the industrial and commercial space continues round to the northern elevation facing the Chevron apartments. At the western end of this facade, recesses are solid rather than glazed, as this is not a primary frontage. However, these would be designed as 'soft spots' so that they could become glazed in the future, if the route along the north of the development becomes a public route, as indicated in the AAP. Details of this will be secured via a condition.
162. The elevation fronting the new pedestrian route would be important to ensure that this would provide an attractive, functional and safe access for future residents and local community. This route serves a number of functions including access to the residential and commercial uses, the community room, the play area, a resting space and eventually a path through to the Six Bridges Estate. The residential entrances for buildings A and B are located along this facade, and these are identified in the same way as building C - set within a recess that matches the height of the adjacent openings, but with a mural in a panel above the entrance, and a recess to the entrance door. It is noted that there would be an area of the façade that would not have any glazed element (due to the location of the refuse stores). Five of the double height openings are proposed as solid rather than

glazed, and these will provide additional surfaces for the mosaic artwork to be located (referencing the murals in Old Kent Road), creating further interest along this facade. The mosaic work would be secured via a condition. .

**Image: South elevation of the main block fronting new route**



**Image: Sketch view of development looking from St James's Road**



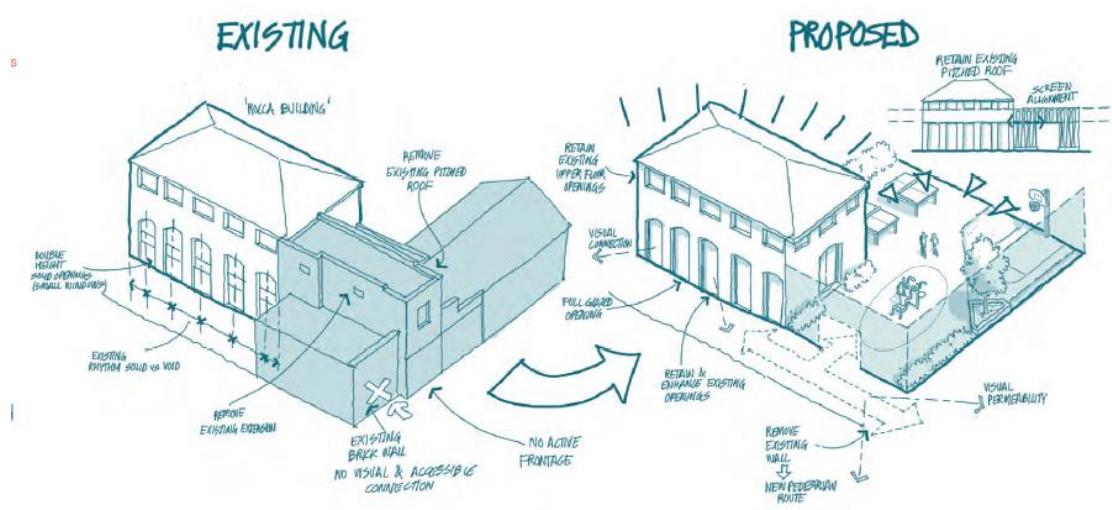
Sketch view 01



Sketch view 02

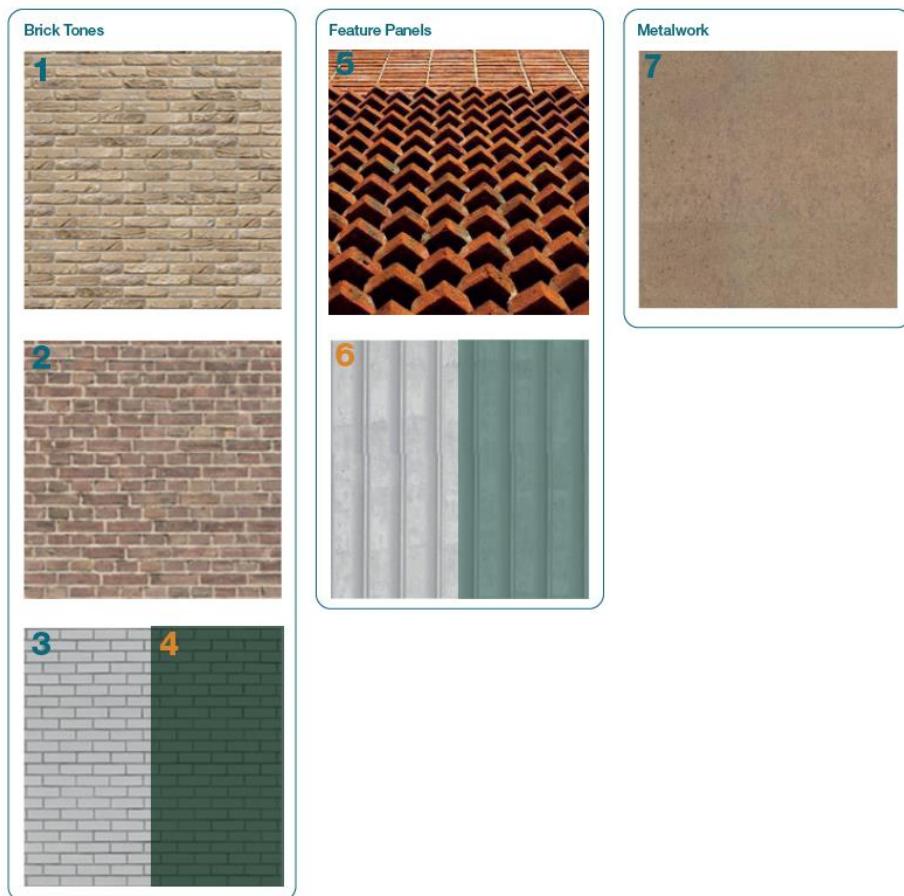
163. The retained building at 330 St James's Road, will be enhanced and upgraded. Where existing original windows survive these will be refurbished and reused. New glazing will be added to the existing recessed arches, in order to allow more daylight into the community room. The glazed frontage will also help activate the new play route, allowing visibility of the activity happening within the building. Areas that will need to be made good, following the removal of adjacent buildings, will used as an opportunity to make the building more open to the surrounding public realm. New glazed windows are proposed on the north west corner, which would allow the internal activity to signify the western entrance point to the new play route and for the internal activity to activate the play space. It is considered that overall the scheme would provide an active and animated frontage to this new pedestrian route.

## Sketch: Existing and proposed retained Roca building



164. Policy AAP 10 states that reveals should generally be of a full brick depth (215mm). Officers requested detailed bay studies and section drawings to ensure that this could be achieved at this design stage. These have been provided. Full details will further be required by condition. In order to ensure that this is realised in the final building planning conditions requiring detailed drawings, material samples and full-scale mock ups are recommended.
165. The most widely used bricks reflect the predominance of London Stock brick in the area. Feature panels are proposed on each building to give a unique identity of to each part of the building, enabling residents to clearly identify the location of their own home in the development. The feature panels may utilise the same brick types, but with a different brick bond to create a different texture, or contrasting materials and colours.

## Image: Material palette



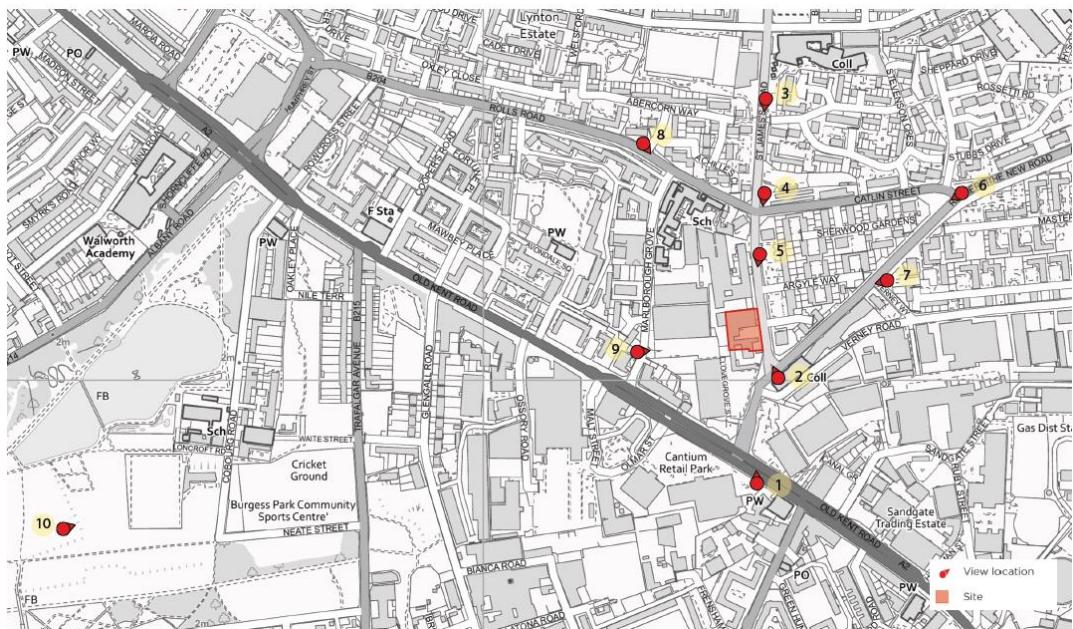
## Heritage considerations and impacts on protected views

166. Chapter 16 of the NPPF contains national policy on the conservation of the historic environment. It explains that great weight should be given to the conservation of heritage assets. The more important the asset, the greater the weight should be (paragraph 199). Any harm to, or loss of significance of a designated heritage asset should require clear and convincing justification (paragraph 200). Pursuant to paragraph 201, where a proposed development would lead to substantial harm or total loss of significance of a designated heritage asset, permission should be refused unless certain specified criteria are met. Paragraph 202 explains that where a development would give rise to less than substantial harm to a designated heritage asset, the harm should be weighed against the public benefits of the scheme. Paragraph 203 deals with non-designated heritage assets and explains that the effect of development on such assets should be taking into account, and a balanced judgment should be formed having regard to the scale of any harm or loss and the significance of the asset. Working through the relevant paragraphs of the NPPF will ensure that a decision-maker has complied with its statutory duty in relation to Conservation Areas and Listed Buildings.
167. Development plan policies (London Plan Policy HC1 and Southwark Plans Policies P19, P20 and P21) echo the requirements of the NPPF in respect of

heritage assets and require all development to conserve or enhance the significance and the settings of all heritage assets and avoid causing harm.

168. The site is not within a conservation area and the existing building is not listed. The building at No. 330 (Roca building) is however, identified as a building of architectural merit. The AAP identifies the cluster of small industrial buildings to the south of the site as having a historical finer grain that should be retained. The old varnish and 'Japan' factory is identified as being of historical merit that should be retained. The nearest conservation areas are Thorburn Square and Glengall Road, which are over 260m away. The site is not within any protected views.
169. The retained Roca building is three storeys in height with a symmetrical façade and industrial-style, large windows. As discussed above, the proposal to refurbish the existing windows and remodel this existing building to make it more visible, active and open is welcomed. The minor works proposed to the facades do not remove the original character of the building.
170. The applicant has submitted a Townscape Visual Impact Assessment (TVIA), which selected 10 townscape viewpoint locations for assessment. Within this assessment are also views looking south-east (towards Grade II listed Eveline Lowe School) and a view from Burgess Park, from hill west of football pitch, looking north-east (towards Cobourg Road, Trafalgar Avenue and Glengall Road Conservation Areas).
171. The visual assessments are carried out by comparing an 'existing' photograph of the baseline condition with a 'proposed' image of the final condition after the proposed development has been completed and a 'cumulative' image of the proposed development in combination with other consented schemes in the vicinity. Given that the site is within the emerging AAP Masterplan area, which has also informed the design of the proposed development, a fourth image of the 'emerging' condition is also included for reference. In summary, here are the following list of scenarios:
  - 1) 'Existing view' of the baseline condition;
  - 2) 'Proposed view';
  - 3) 'Cumulative view' - nearby schemes both consented and under construction; and
  - 4) 'Emerging view'.

## Map: Viewpoints selected for assessment



172. The TVIA determined that in the majority of views, the visual effects were found to be beneficial both for the proposed development in isolation and cumulatively with other approved schemes because of an improved skyline. It is noted that two views (Views 6 and 10) were determined to have a neutral effect on visual amenity due to either distance or because the proposed development would be minimally visible as a result of obstructions such as the built form or vegetation. From the assessment, it was found that the development would not have any adverse effect on the townscape and visual receptors. Below is an assessment of the selected more sensitive views.
173. View 8 - Rolls Road, at junction with Acanthus Drive, looking south-east (towards Grade II listed Eveline Lowe School)

Looking south-east, this view is located along Rolls Road at the junction with Acanthus Drive. In the centre middleground of the view is the Phoenix Primary School, which is Grade II listed as the 'Eveline Lowe School'. The development is visible within the setting of the listed school and local authorities have a duty to have special regard to the need to preserve or enhance the special architectural and historic interest of listed buildings and their settings. Something reiterated in both London Plan and Southwark Plan policies,

174. Block C is not visible from this location, whilst Block B is only minimally visible due to intervening built form and mature vegetation. Though the lower elements of Block A will also be partially occluded by mature vegetation, this block will be clearly appreciable from this location. Whilst details of the façade and the high quality materials will not be discernible from this distance, the careful articulation designed to break down the massing of this block will be appreciable. It is noted that the proposed development appears taller than Chancellor House in this view

due to the parallax effect, but the measures taken to break down its massing, including the material variation, which accentuate the ‘stepping up’ of the blocks’ massing, as well as the set-back of this massing from St James’s Road, mean that the proposed development sits well within its context in this view.

175. In the cumulative scenario, the various schemes indicate the changing skyline in this area and along the Old Kent Road, demonstrating how the proposed development will form an addition to this emerging cluster, and will successfully mediate the contrast in the scale between the existing low rise development in the area and the high-rise elements coming forward. This is through the ‘stepping-up’ of the proposed development’s massing, which is key to its design and articulation. The development would be visible in the setting of the listed school, but it is not considered to harm that setting. The school is already seen in the context of the historic tall buildings of the Avondale Estate, which were built in the early 1960s and are contemporary with the listed school as well as later tall buildings including the “Bermondsey Works” tower. As noted above the location of tall buildings with the AAP masterplan is consciously designed to successfully mediate changes in scale across the area and ensure that the aggregate impact of tall buildings within the AAP would not harm existing heritage assets.

**Proposed – View 8 Rolls Road, at junction with Acanthus Drive, looking south-east (towards Grade II listed Eveline Lowe School)**



**Cumulative – View 8 Rolls Road, at junction with Acanthus Drive, looking south-east (towards Grade II listed Eveline Lowe School)**



**176. View 10 - Burgess Park, from hill west of football pitch, looking north-east (towards Cobourg Road, Trafalgar Avenue and Glengall Road Conservation Areas)**

The proposed development would be partially occluded by the mature vegetation of Burgess Park. The western façade of Block A would be visible, and whilst the subtle differentiation in brick tone on the two lower elements of Block A are unlikely to be discernible from here, the articulation of the white brick ‘pop-up’ crowning the block will lessen the visual impact of the proposed development’s massing, by providing a lightness where the building meets the sky. Owing to the long-distance nature of this view, however, it is considered that the proposed development will have a neutral effect on this view.

**Proposed: Burgess Park, from hill west of football pitch, looking north-east (towards Cobourg Road, Trafalgar Avenue and Glengall Road Conservation Areas)**



177. There are numerous cumulative schemes visible in this views and would comprise the emerging Old Kent Road cluster and demonstrate the changing skyline in this location, with numerous tall buildings of up to 48 storeys in height coming forward. The proposed development serves to successfully mediate the increase in scale, 'stepping-up' to the tallest elements along the Old Kent Road itself. Overall, the magnitude of change to the view will be significantly greater than that of the proposed development in isolation, and it is considered that the proposed development forms only a minor part of this overall change.

**Cumulative: Burgess Park, from hill west of football pitch, looking north-east (towards Cobourg Road, Trafalgar Avenue and Glengall Road Conservation Areas)**



178. In conclusion, the proposed development would not have a significant negative impact on local viewpoints, and will be an improvement to the townscape character of the site. It would sit comfortably with the emerging context.

**Secure by design**

179. Secure by Design officers from the Metropolitan Police have reviewed the proposals and confirmed that having discussed this with the developer is encouraging to see that the designers have considered Secured by Design, and believe that this will result in a positive impact upon the development from a safety and security perspective. The design of the development has considered opportunity for natural surveillance, incorporates excellent lines of sight and the development should 'activate' this area. These are all excellent crime prevention measures and continued liaison with a designing out crime officer will enhance this. A well-designed lighting scheme is important to ensure public safety in areas of public realm and to ensure that there is not a fear of crime caused by poor levels of light. This is important given the new pedestrian route and how it terminates at the western end before the rest of the masterplan is developed. The Metropolitan Police design adviser states that in order to achieve these goals a condition is placed on the development if permitted to achieve a SBD award. Officers also recommend a condition securing details of the external lighting and landscaping details to ensure that western section of the route would be safe and secure.

## **Landscaping and biodiversity**

180. The landscaping of the development has been designed for the different character areas – podium, pedestrian route, playspace and roof terrace.
181. For the play space on the podium, the landscape is inherently playful in nature with a series of playable routes in combination with a series dedicated play pieces. These might include timber play structures, bouldering wall and ramp and a lawn for gathering. The playspace on the podium would be aimed for 0-11 years of age. Areas of seating on this podium would also allow for resting. These will also be required to include sand and water play for younger children as well as space for food growing as required by policy AAP 10. The playspace within the ground floor yard accessed from the new route will be open and sunny and includes gym equipment, basketball hoops all aimed at older children from 11yrs and above. The rooftop terrace on Block C would be family playspaces for the residents. The roof terrace on Block B would be quieter communal amenity space. There would be dense and attractive planting with pockets of larger seating areas for gathering to promote community interaction and social exchange. Details of the planting would be secured by a condition.
182. The proposed landscaping would provide appropriate defensible planting as a buffer to residential terraces. In terms of surfacing, the design proposal utilises a variety of materials, taking its cue from the colours and materials used locally. Materials have been selected for their robustness and durability. Natural Aggregate Resin-bound Gravel is used in well-trafficked spaces, both vehicular and pedestrian. These details will be secured by a condition.
183. Soft landscaping will frame the walking route, improving biodiversity in this area. Play along the way is incorporated into the landscape, making this an active route for children, and seating areas are also provided, offering a place for rest and socialising.
184. Due to the building being at the proposed height and the cumulative schemes coming forward, the applicant has submitted a wind and microclimate report. It is proposed to provide new interactive screens along this route to provide a playful accessible outdoor gallery. The screens criss-cross the central spine, and will frame the proposed planting and building entrances. The fins on these screens will be able to move with the wind, creating an installation that generates movement along the street, and also a learning opportunity for children. This form of wind mitigation fins will wrap around the ground floor play space behind the Roca building and provide an enclosed space that allows for visibility as well as wind mitigation. Climber plants could potentially go on these fins and details will be secured by condition.
185. Since the fins are required for controlling the wind effects, it is expected that the applicant will be responsible for maintaining this strip and its installations. An estate management plan in the s106 agreement would secure this.

186. Policy P59 of the Southwark Plan (Green infrastructure) states that 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.
187. The council's ecology officer has reviewed this and considered that the submitted ecological surveys are satisfactory and no further surveys are required. The recommendation to have an ecologist on a watching brief during demolition should be actioned and this would be secured by condition. It is considered that the development proposes a mix of rooftop landscapes and the biodiverse roofs provide the main gain for ecology. Conditions have been recommended to secure the green roofs, ecological management plan and for 12 No. swift bricks for each block.

### Urban greening and trees

188. 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 predominately commercial development (excluding E(g) iii uses).
189. The development proposes an urban greening factor (UGF) of 0.41. The site does not contain any existing trees. Columnar trees are proposed at ground level to create a distinct treeline along the street. Multistem specimens are proposed at podium and rooftop level acting as a type of visual impediment to skew but not restrict views into the play and amenity spaces. Some larger feature trees are also proposed. There would be a requirement for minimum soil volume for any tree at podium level, which could be conditioned. Irrigation and establishment will be key with landscaping retained for the use of the building and include a specific landscape management plan.

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

190. 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 use**

191. Given the surrounding area comprises of mixed use developments, commercial and industrial warehouse, along with residential uses, it is considered that the commercial/office use would not detrimentally impact surrounding neighbour

amenity. In addition, the proposed use complies with the typologies for this site within OKR11, and accordingly to be an acceptable use.

## **Daylight and sunlight impacts**

192. 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).

### BRE Daylight tests

193. As mentioned in paragraphs above, guidance relating to developments and their potential effects on daylight, sunlight, and overshadowing is given within the BRE guidelines. This report gives criteria and methods that are explained subsequently for calculating daylight and sunlight effects on surrounding receptors as a result of the proposed development.
194. 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.
195. The BRE guideline tests undertaken for this daylight assessment are the Vertical Sky Component (VSC), and Daylight Distribution (DD). 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.
196. The distribution of daylight within a room can be calculated by plotting the ‘no skyline’. The no skyline is a line that 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 that can receive direct skylight is reduced to less than 0.8 times its former value.

### BRE sunlight tests

197. As a reminder, when assessing sunlight, the BRE recommends that the Annual Probable Sunlight Hours (APSH) received at a given window in the proposed case should be at least 25% of the total available, including at least 5% in winter. Where the proposed values fall short of these, and the absolute loss is greater than 4%,

then the proposed values should not be less than 0.8 times their previous value in each period (i.e. the proportional reductions should not be greater than 20%). The BRE guidelines state that ‘...all main living rooms of dwellings, and conservatories, should be checked if they have a window facing within 90 degrees of due south. Kitchens and bedrooms are less important, although care should be taken not to block out too much sun’. The APSH figures are calculated for each window, and where a room is served by more than one window the contribution of each is accounted for in the overall figures for the room. The acceptability criteria are applied to overall room based figures.

### Overshadowing

198. 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.’

199. The applicant has tested the nearest residential units close to the development site and their impacts are discussed below.

### **Plan: Proposed Plan view**



200. 330-334 St James's Road

This is to the south of the application site and the units comprise a mix of commercial, live/work and residential uses. Following discussion with the owners of this site and a site visit, a revised assessment was undertaken to analyse the potential impacts. The results of the VSC assessment show 13 of the 24 windows tested adhere to the BRE guidelines. It is noted that of the remaining 11 windows, the ratio reductions range between 0.58 and 0.76, but it should be noted that the proposed VSC levels range between 14.79% and 25.92%, which are still good light levels for an inner-city context.

201. The results of the daylight distribution assessment show 13 of the 15 rooms tested adhere to the BRE guidelines. Of the remaining 2 rooms, the ratio reductions range between 0.77 and 0.78, which are only just below the BRE guidelines target of 0.8.
202. In terms of sunlight, the results of the APSH assessment show all 24 windows tested exceed the BRE guidelines targets.
203. In summary, it is considered that the proposed development will maintain acceptable levels of daylight and sunlight to the rooms within 330-334 St James's Road.

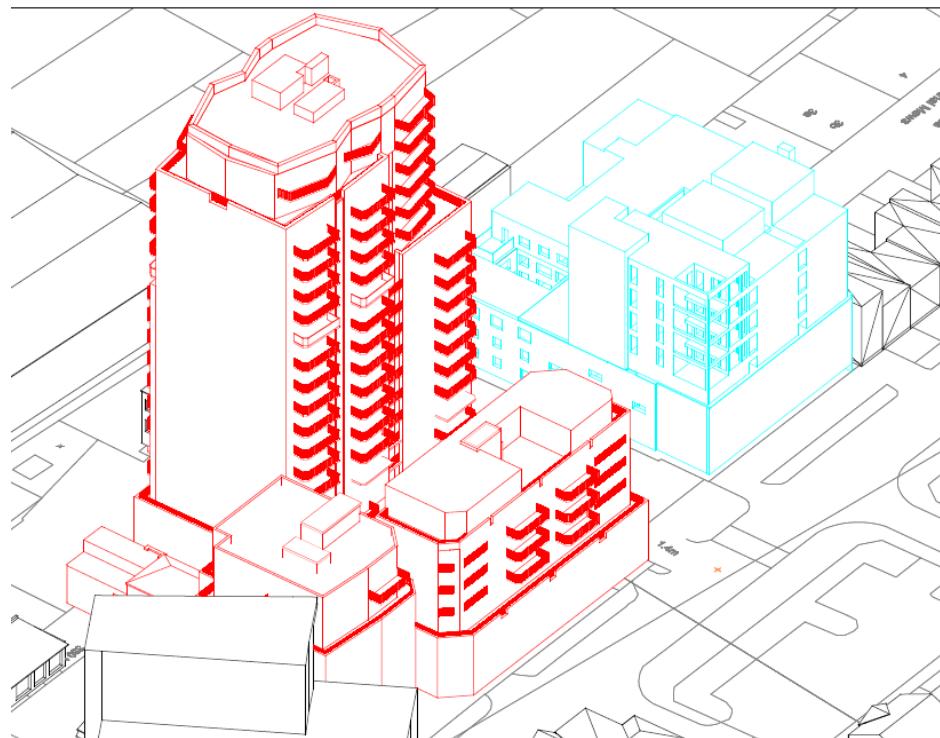
204. Chevron Apartments - 294-304 St James's Road

The VSC assessment show 18 of the 41 windows tested adhere to the BRE guidelines. Of the remaining 23 windows, the ratio reductions range between 0.44 and 0.79. Whilst the lower end seems low, it should be noted that many of the rooms have more than one window serving it, so reviewing the daylight levels within the room gives a better indication of the effects.

205. The results of the Daylight Distribution assessment show 17 of the 27 rooms tested adhere to the BRE guidelines. Of the remaining 10 rooms, the ratio reductions range between 0.4 and 0.78, and 9 of the 10 rooms affected are located on the south elevation, looking over the current low-level buildings of the development site. The applicant argues that the existing condition of those rooms on the south elevation currently obtain total light within the rooms and therefore breaches of the BRE guidelines would be inevitable. It is also noted that the lowest levels (4 and 0.4 loss) would be to bedrooms.
206. The results of the APSH assessment show 29 of the 30 windows tested exceed the BRE guidelines target for annual sunlight. This demonstrates a good level of sunlight would be retained by the proposed development.
207. The overshadowing assessment of the ground floor level courtyard results demonstrated that none of the courtyard area receives 2 hours of sunlight on the assessment date of 21st March, either in the existing or proposed condition. Therefore, the BRE guidelines are met for the overshadowing assessment showing no change.

208. The applicant has also carried out an assessment on the Chevron apartments once the approved (subject to an agreed s106 agreement) extension is built. The VSC assessment shows that 34 of the 73 windows would adhere to the BRE guidelines. There are additional windows falling below the target that light bedrooms, kitchens and living rooms on the approved element of the Chevron Apartments. However, both the kitchens and living rooms are dual aspect, so although there are effects to the new windows facing the development site, the windows facing onto St James's Road exceed the target, ensuring the rooms are well lit in the proposed condition.
209. The results of the Daylight Distribution assessment show 25 of the 39 rooms tested would adhere to the BRE guidelines. Of the remaining 14 rooms, the 10 existing flats are affected to the same degree, with 4 bedrooms to the approved element of the Chevron Apartments falling below the guideline target. Those additional rooms that do fall below are bedrooms, which are used for sleeping and the degree of loss is not considered to be significant.
210. The APSH assessment show that the additional windows in the Chevron apartments would experience good levels of sunlight.
211. The overshadowing assessment results demonstrate that all three amenity areas in the Chevron apartments (plus extension) adhere to the BRE guidelines. The ground floor courtyard area showing no change in sunlight between the existing and proposed, with the third floor level amenity areas greatly exceeding the 50% target.

**Image: Proposed 3D view of cumulative scenario with Chevron Apartments extended**



212. 1-8 Culloden Close

VSC) assessment show 11 out of 24 windows tested adhere to the BRE guidelines. Of the 13 windows falling below, these do so only just, with ratio reductions between 0.71 and 0.79 and is not considered to be a significant degree given this urban context.

213. The results of the Daylight Distribution assessment show 16 out of the 24 rooms tested adhering to the BRE guidelines. Of the 8 rooms falling below, the ratio reductions range between 0.63 and 0.79. Again, this is not considered such a major loss in this urban location that would warrant a refusal.

214. The results of the APSH assessment show 19 of the 24 windows tested exceeding the BRE guidelines target for the annual sunlight, whereas for the winter sunlight provision 18 of the 24 windows adhering to the target threshold. The ratio of loss however, is not considered to be significant.

215. As there will be additional massing fronting St James's Road, if the approved Chevron Apartments building were to be built, an assessment of the cumulative effects of the approved (subject to s106) Chevron Apartments building and the proposed development on the Culloden Close properties was undertaken. The cumulative assessment demonstrates almost identical results to the baseline versus the proposed condition, so the effects to the Culloden Close properties remain the same, with or without the Chevron Apartments approval built out.

216. 1-23 Archers Lodge

The VSC assessment show all 16 windows fall below the BRE guidelines, with ratio reductions ranging between 0.52 and 0.62. It is noted however, that the absolute VSC figures are not considered that low for such dense urban context.

217. The results of the Daylight Distribution assessment show 1 of the 8 rooms tested adhering to the BRE guidelines target ratio reduction of 0.8. The 7 remaining rooms only just fall below the 0.8 ratio target, with levels ranging between 0.73 and 0.79, which is considered acceptable in this instance.

218. In terms of sunlight, the results of the APSH assessment show all 16 windows would adhere to the BRE guidelines.

219. 395 Rotherhithe New Road (Chancellor House)

The applicant tested the residential units up to the fifth level, as these would have the worst case scenario. The results of the VSC assessment show 45 of the 50 windows tested would adhere to the BRE guidelines. The applicant notes that those windows that fall below are recessed windows that are blinkered by balconies above to such a degree that they rely on a small area of the sky for the daylight, but many of the windows serve rooms that have other windows and so the Daylight Distribution test would be a better way of analysing this.

- 220. The results of the Daylight Distribution assessment show all 43 rooms tested would adhere to the BRE guidelines, demonstrating no noticeable reductions in light will occur with the proposed development in place.
- 221. Sunlight assessment has not been undertaken as the windows face 90 degrees of due north.
- 222. Given that the lower floors tested show good levels of daylight and sunlight, it is assumed that all the units above this would adhere to the BRE guidelines.

### Conclusion on daylight and sunlight impacts

- 223. Following the review of the analysis, it is considered that the proposed development would not have a significant detrimental impact on the neighbouring occupiers in terms of daylight and sunlight availability.

### **Overlooking of neighbouring properties**

- 224. 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.
- 225. The nearest residential windows are those belonging to the Chevron apartments located to the north and looking south of the development site. The extension proposed on the Chevron apartments would also have windows overlooking the site.
- 226. The proposed development would have windows on the northern elevation overlooking Chevron Apartments and at a separation distance of approximately 16m, but this would be across a car park. Furthermore, the ground and mezzanine levels of the proposed development would have commercial uses that would not contain living space and therefore no direct overlooking into the existing neighbouring windows at the Chevron Apartments. The upper floor residential windows proposed in Block B would be positioned so that they are not directly opposite the windows in the Chevron Apartments and therefore no significant privacy issues are raised.
- 227. The podium garden would have planting, trees and balustrade around the edge and would therefore limit overlooking into the neighbouring property.
- 228. The neighbouring properties to the east of the site (Culloden Close and Archers Lodge) are at least 12m from the development across a highway and therefore comply with distance guidelines.

### Conclusion on amenity impacts

- 229. The proposed development would have some impact on the neighbouring properties, particularly to the development to the north (Chevron Apartments).

Nevertheless, as discussed above, the impacts would be limited and would not result in a significant adverse impact on their amenity.

## **Transport considerations**

230. 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.
231. The Mayors Transport Strategy (MTS) Mayors Transport Strategy (MTS) includes three strategic challenges that are of significant importance to assessing this application.
  - Vision Zero
  - Healthy Streets
  - Air Quality
232. The applicant has submitted a Healthy Streets Transport Assessment and provides 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 and detailed estimates of vehicular trips resulting from the development.

## **Trip generation**

233. In summary, the residential aspect of the development is expected to generate approximately 86 and 68 two-way person trips during the AM and PM peak hours respectively. It is predicted that the proposals will generate 27 and 22 additional two-way person trips using the local bus network respectively in the AM and PM peak hours, as well as 25 and 20 additional two-way person trips using the underground across the hour. In addition, the proposed development is expected to generate approximately 32 two-way servicing vehicles daily.
234. Given that the scheme is car-free with the exception of 5 wheelchair parking bays, the majority of residents would travel by active modes of use of public transport. It is assumed that each accessible bay proposed will produce two arrival and two departure trips daily, resulting in a total of 20 two-way vehicle movements per day being generated by resident vehicles.
235. The anticipated delivery and servicing trips that will be generated by the re-provided industrial land was also assessed. It concluded that the proposed commercial uses would generate a total of two arriving Light Goods Vehicles (LGVs) movements per day (it is assumed that these two vehicles would also generate two departure trips) and therefore a total of four two-way movements from LGVs are anticipated on a daily basis. One arrival and one departure trip is anticipated to be generated by Other Goods Vehicles (OGVs), as such a total of six two way delivery and servicing movements are anticipated to be produced by the industrial land uses at the site.

236. These vehicle movements would not generate any significant adverse impact on the existing movements on the adjoining roads. It is not considered that the proposed development would significantly impact on the local highway network in terms of trip generation.

### Car parking

237. The development is car-free except for 5 disabled persons' parking within the internal ground floor podium, accessed from St James's Road. This is equivalent to three per cent of dwellings having access to a disabled person parking space from the outset and meets London Plan policy. TfL has recommended a Parking Design and Management Plan (PDMP) should be secured through condition which details how additional disabled person parking spaces could be provided as and when demand arises. All parking spaces on-site will be provided with Electric Vehicle Charging Points.
238. The site is located within an existing Controlled Parking Zone (CPZ) and a s106 obligation would ensure that no future residents or occupiers of the proposed development could obtain resident parking permits. It is also recommended that a condition be imposed to ensure all marketing of the development promotes car-free living, to ensure the occupants are well aware they will not be entitled to permits.

### Servicing and delivery

239. As explained above, it is estimated that the proposed development will generate a total of 36 delivery and servicing trips a day - 4 for the industrial and 32 for the residential. It is considered that the delivery and servicing assessment for the residential element is robust. It is proposed that both on-street (for refuse vehicles) and on-site (internal servicing area for 4.5 light vans) facilities will be used to support delivery and servicing activity at this site.
240. Following discussions with the applicant, the servicing has been consolidated and will only take place internally with the access from St James's Road located in the northern block. Amendments have also been received removing the servicing and parking area to the rear of the Roca building to make way for the play area. TfL had raised concerns that there is potential conflict between vehicles entering and exiting the site at the same time and how the internal delivery and servicing arrangements would work given the proposed shared use of the disabled persons' parking areas.
241. The resident accessible parking spaces are anticipated to generate a total of 20 two-way vehicle movements per day. It is noted that only light vans will be accommodated within the internal servicing area. Given the relatively low level of trips within the internal servicing yard, the potential for vehicles (residents and commercial deliveries) to be entering and exiting the site at the same time is very low and additional measures are therefore unnecessary. It is considered reasonable that an obligation in an s106 requiring a comprehensive and robust

servicing and management plan be secured ensure that vehicular conflicts would be minimised.

242. 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 OKR OA 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 Regulations 122 test, in that it would 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.

243. The proposal is for the management of the new development to monitor the daily vehicular activity of the site both commercial and residential, quarterly for a period of 2 years from 75% occupancy. If the site meets or betters its own baseline target (36 trips) 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. The council will retain £1,600.00 for assessing the quarterly monitoring. The bond in this instance would be £15,700 based on the 153 residential units and 1,900sqm of non-residential floor space. The applicant has agreed to the contribution, which can be collected via the legal agreement.

### Refuse and waste management

244. Refuse collection for the proposed development will take place on-street, as there are no waiting restrictions adjacent to the site frontage. Refuse stores will be provided on the ground floor of the buildings. One is proposed within Block C and is accessed from the playstreet. The other refuse stores are proposed adjacent to the access to the car park and located off the car park, at the base of the northern block. Refuse will be stored within the individual demises of the commercial units, and will be collected from St James's Road. Further details of the commercial refuse storage would be secured by a condition.
245. Refuse staff will have access to the refuse stores, with bins stored within the development until their collection to prevent blocking of the footway for pedestrians creating conflict.

### Public transport

246. The site has a PTAL rating of 3, which is considered to be 'moderate' in terms of accessibility to public transport. The site has convenient access to public bus services with bus stops within walking distance. Bus services run to Peckham, Canada Water, Elephant and Castle, Lewisham and other parts of South-East

London. The closest railway station to the site is South Bermondsey Station, approximately 900m (11-minute) walk to the east of the site. The closest London Underground Station to the site is Bermondsey, approximately 1.5km (18-minute) walk north of the site.

247. As a borough, Southwark agrees with TfL that bus services will need to be increased in the area ahead of the Bakerloo Line Extension (BLE) to accommodate the demand generated by additional homes and jobs generally in the Old Kent Road area in advance of the opening of the planned BLE. A contribution of £2,700 per residential unit would be secured towards improvements to the bus network in accordance with Policy T4 of the London Plan and IP2 of the Southwark Plan.

## **Active transport**

### Walking and the public realm

248. The proposal allows for the future pedestrian and cycle links onto the Six Bridges Estate to be realised at a future date and the route would be designed to be well overlooked and active. A Healthy Streets Transport Assessment, prepared by Vectos, is submitted in support of this application. An Active Travel Zone Healthy Streets assessment has been carried out that demonstrates that the site is located within a sustainable location with access to several local amenities and public transport stops. TfL had provided comments and initially sought further analysis. However, following discussions between the applicant and TfL, refreshed and/or new Legible London will be secured in the s106 agreement. The s106 agreement will require the route through the site to be kept open 24/7 once the remainder of the masterplan to the west is completed. TfL also requested that the Healthy Streets indicators to create a quality pedestrian environment should be considered in the landscaping plan for this route – the landscaping condition will secure this.
249. A minimum of 2.4m wide footway is provided on St James's Road. The applicant would renew and upgrade the kerb and footway adjacent to the development to the appropriate materials as specified in the council's regulating plan and materials palette. Since the application site falls within 'General' designation the footways should be paved with precast concrete paving slabs and with 150mm wide granite kerbs. This can be secured through a s106 Agreement and the s278 Agreement. Other highway works undertaken would be secured in the section 278 agreement, which includes:
- Repave the footway including new kerbing fronting the development, in accordance with the Southwark Streetscape Design Manual (SSDM) standards.
  - Reconstruct any redundant vehicle crossovers fronting the development as footway in accordance with the SSDM standards.
  - Construct any proposed vehicle crossovers fronting the development in accordance with the SSDM standards.
  - Reconstruct any existing vehicle crossovers fronting the development in accordance with the SSDM standards.

- Review existing and proposed signage fronting the development and investigate the possibility to install any existing / proposed signs on the building walls in order to improve effective footway widths.
- Remove or relocate any redundant street furniture fronting the development if required (I.e. no stopping school signs, steel bollards, etc.). Include the possibility to install any sign plates on the new building walls in order to improve effective footway widths.
- Provide appropriate dropped kerbs for refuse bin collection.
- Refresh road markings following kerb installation.
- Promote a TMO to amend any parking / road markings arrangements. Works to include road markings and signage if required.
- Rectify any damaged footways, kerbs, inspection covers and street furniture due to the construction of the development.
- Upgrade street lighting to current LBS standards (including on private roads). Investigate the possibility to provide lamp columns mounted to the building walls in order to improve effective footway widths.

## Cycling

250. London Plan Policy T5 sets minimum cycle parking standards for different uses. Southwark Plan Policy P53 sets out a higher requirement than the London Plan standards.
251. The proposed cycle parking would be provided within each block. There would be cycle store on the ground and mezzanine levels within the northern block and separate cycle store within the ground floor level of Block C. The commercial cycle store would be provided within the northern block. After extensive discussions with TfL, amended plans have been received to address their concerns. TfL had concerns over aisle widths, lift dimensions or provision of wider access Sheffield stands and other cycle parking spacing issues. TfL also notes that London Design Cycle standards (LCDS) is clear that not everyone can use two-tier racks, and that more accessible stands should be provided for them (and this is separate from the requirement to provide stands for wider/larger cycles).
252. In total, the London Plan would require 275 long stay cycle parking for the residential units and 11 long stay provided for the commercial uses would have been required for the development. In total 255 long-stay spaces are provided in total, a slight reduction of 31 spaces from that required by policy. This is considered acceptable given the sites constraints. TfL has confirmed that numerical standards applicable to the previous London Plan are met and that can accept that in this case in recognition of the constraints of the site (re-provision of industrial floorspace).
253. The New Southwark Plan standards for office use is slightly higher, but it is noted that the office use is only a small element of the scheme. It would only require an additional 2 cycle spaces and is not considered to be significant to warrant refusal on its own. It is possible to see how more could be achieved when details are submitted at condition stage. A combination of Sheffield stands and two-tier racks are proposed. Furthermore, spaces are also provided for larger cycles.

254. Visitor cycle parking is proposed along the new east-west route and would be easily accessible and visible.
255. In line with the approach taken by Southwark elsewhere in the Old Kent Road area a s106 contribution at a tariff of £50 per home should be secured towards the expansion of the TfL cycle hire network, totalling in this case £7,650. To further support sustainable travel and cycling travel plan targets, 3 years free membership of the scheme has been recommended by TfL and to be secured for every first household (£120 per unit, per year, totalling £55,080). The applicant has agreed to this.

### Construction

256. An outline Construction Logistics Plan (CLP) has been submitted and agreeable in principle. Construction vehicle routing details will be provided once further detail is known about the construction methods; however, construction vehicles will be encouraged where possible to use strategic roads and avoid busier roads and residential streets. Construction deliveries will be carefully planned with delivery times agreed with each contractor using a booking system. Delivery schedules will be produced in order to review the profiles of up and coming deliveries, regulate deliveries and eliminate bottlenecks. The S106 would secure a detailed Demolition and Construction and Environmental Management Plan (DEMP and CEMP) and a final CLP. £40 per unit contribution for Construction Management monitoring would be secured within the OKR AAP area. This is for the council to manage cumulative impacts on the highways and environment.

### Conclusion on Transport

257. The development is supported because it provides improved and good quality pedestrian and cycle facilities. It reduces car dependency and would not have a significant impact on public transport services. It would have appropriate management to reduce the impact of servicing and delivery, subject to the s106 obligations and conditions.

### **Archaeology**

258. 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. The site lies within an Archaeological Priority Area (APA) for 'North Southwark and Roman Roads'. This is a Tier 1 APA where Tier 1 areas comprise heritage assets of national significance.
259. The applicant had submitted a desk-based archaeological assessment and it identified a low to moderate archaeological potential at the site for the Later Prehistoric periods, and a moderate potential for evidence of Roman activity. A low to moderate potential is considered for palaeoenvironmental remains should alluvial and peat deposits be present at the site. It is considered that any remains, if present at the site, would most likely be of up to a local significance only. It

concluded that the likely extent of past ground disturbance at the site as a result of modern development would suggest that, had they been present, surviving archaeological remains are likely to have been severely truncated or removed entirely, therefore reducing the archaeological potential of the site.

260. The applicant's desk-based archaeological assessment does not include data from sites excavated recently to the north of the development at the junction between St James Rd and Rolls Road. This site revealed prehistoric archaeology surviving within an area of high stands and gravels. The desk-based assessment does not consider site investigation works from surrounding sites to aid the establishment of a suitable baseline. In order to address this, conditions for archaeological evaluation, archaeological mitigation works, foundation design and the submission of a timely report are recommended.

## **Environmental considerations**

### **Flood risk and water resources**

261. Policy P68 (Reducing flood risk) of the Southwark Plan states that development must be designed to be safe and resilient to flooding and finished floor levels are set no lower than 300mm above the predicted maximum water level where they are located within an area at risk of flooding. Additionally, major development is required to reduce surface water run-off to green field run-off rates, and this must be through the application of water sensitive urban design and SuDS.
262. The site lies within Flood Zone 3 and is classified as having a high probability of flooding from tidal and fluvial sources. However, the River Thames defences protect the site up to the 1:1000 year standard and therefore the development would not be at risk of flooding from tidal and fluvial sources. The applicant's Flood Risk Assessment (FRA) confirms that in the future scenario, there could be risk of flooding as the finished floor level is 1.42m and could flood by a depth of up to 380mm. Residential units are therefore located on the upper floors.
263. The Environment Agency (EA) has reviewed the submitted information in relation to flood risk and has no objection to the proposed development. The proposed development will only meet the requirements of the NPPF if the measures as detailed in the FRA by Elliott Wood submitted with this application is implemented and has recommended that these be secured by way of a planning condition on any planning permission. The EA has recommend that flood resistant and resilient measures are incorporated in to the design and construction of the development proposals, where practical considerations allow.
264. The proposal has also been reviewed by the council's Flood and Drainage Engineer. Surface water runoff from the proposed development will be attenuated in a combination of blue roofs, permeable paving and below ground cellular storage. The sustainable drainage solutions would reduce the offsite discharge rate to mimic the 1 in 100 year greenfield runoff rate.
265. The surface water drainage system has been designed having considerations to the drainage hierarchy. The blue roof at podium level is to feature growing medium

over and will therefore provide ecological benefits as well. The presence of planting at roof level will also provide surface water quality, quantity, biodiversity and amenity benefits in line with the SuDS hierarchy.

266. The development shall significantly reduce the surface runoff rate to 1.3l/s (1 in 100 year plus 40% climate change). A greenfield runoff rate offset of £366 per cubic metre will be secured in the event that there is a shortfall in attenuation required to limit surface water runoff, which is required by the draft AAP 11.
267. The GLA had also commented that the development should achieve the required water efficiency targets for the residential and non-residential uses on site as per London Plan Policy SI.5. The applicant also states that rainwater harvesting will be included at detailed design stage, which is supported and should be secured by an appropriately worded condition.

## **Fire**

268. 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.  
A fire engineer registered with the Engineering Council UK through the Institute of Fire Engineers has prepared the submitted Fire statement.
269. The London Fire Brigade was consulted but no response has been received. Whilst this is a 'relevant building', the Health and Safety Executive was not consulted as the applicant was submitted prior to August 2021.
270. The Fire Statement demonstrates how the development would achieve the highest standards of fire safety, including means of escape, fire safety features and means of access for fire service personnel. The Fire Statement confirms that sprinklers would be installed for all buildings, for both residential and commercial uses. Firefighting lifts would also be designed into the development. The provision of a suitably sized evacuation lift is also proposed in line with Policy D5 of the London Plan.
271. The fire risk assessment/statement covers matters required by planning policy. This is in no way a professional technical assessment of the fire risks presented by the development. The legal responsibility and liability lies with the 'responsible person'. The responsible person being the person who prepares the fire risk assessment/statement not planning officers who make planning decisions.

## **Ground conditions and contamination**

272. Given the history and nature of the uses on the site, there is potential for contamination. The submitted Desk study report assessed the potential for contamination and provided preliminary information on the expected ground conditions and preliminary information on foundation options regarding the proposed development of the site. It confirmed that there is considered to be

Moderate/Very low risk of there being a significant contamination linkage at this site, and it is anticipated that remedial works may be required.

273. The council's EPT has reviewed this and recommended a condition to ensure further investigations be submitted and should there be any found contamination then remediation strategy be submitted and that the measures be actioned.
274. Environmental Agency Officers also agree with the findings of the submitted report and raise no objection subject to conditions.

### **Air quality**

275. The site is located in an Air Quality Management Area (AQMA) and an Air Quality Assessment has been submitted, which considers the air quality impacts arising from the construction and use of the development. 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.
276. The assessment concludes that there would be a small change in road traffic in the local area, but the impacts will be negligible and would not lead to any exceedances of the air quality objectives. Concentrations of nitrogen dioxide and particulate matter are also below the objectives. The report did not find any unacceptable impact from air quality either to the new sensitive receptors or as a result of the development. The developments meets Air Quality Neutral benchmarks. EPT did not raise any objections on this aspect of the scheme.

### **Noise and vibration**

277. A Noise Impact Assessment has been submitted and reviewed by EPT. It was found to be acceptable and conditions have been recommended including securing internal noise levels, limiting plant noise, and horizontal noise transmission between the proposed commercial and residential uses.
278. It recommends further assessment in respect of acoustics ventilation and overheating. EPT noted that the acoustic report highlights potential issues from the interplay of acoustics ventilation and overheating (AVO) (i.e. closed windows are required for sound attenuation and open windows are required for thermal comfort). The Thermal Comfort report appears to confirm this as it is based on an 'open window' strategy. EPT had sought further details and recommended that the applicant provide blinds for all high risk rooms and that they submit further details of the blinds (in line with CIBSE TM59 requirement).
279. Since those comments, the applicant submitted a revised thermal assessment and looked at different options. The chosen option utilises closed windows with light cream/white internal blinds and improved glazing g-Values. Cooling is also applied to the living/kitchen and bedroom spaces. This would resolve the acoustic issue. (See paragraphs below) The windows would still be openable to allow for purge ventilation.

## **Agent of change**

280. 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.
281. The proposed development would go from an established light industrial use to a mixed light industrial and residential building. The surrounding area would likely see mixed residential and industrial uses coming forward and it is therefore considered that the subject scheme will not harm the operation of the existing neighbouring businesses and will mitigate any noise generated through the uses through the design of the scheme and thereby complies with London Plan Policy D13.

## **Sustainable development implications**

### **Energy**

282. 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.
283. 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). The policy also states that non-residential developments must reduce carbon emissions by at least 40% 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.
284. The applicant has submitted an Energy Strategy Report based on the Mayor’s hierarchy. 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, P70 of the Southwark Plan 2022, and the Southwark Sustainable Design and Construction SPD.

### Be Lean (use less energy)

285. 'Be lean' refers to the approach taken by the design team to maximise the positive aspects of the scheme's passive design to minimise the base energy demand of the buildings. As part of this application, key passive ('Be Lean') design features include:

Improved U-values and g-Values as detailed within Section 7

- Improved air permeability
- Improved ventilation performance
- Improved lighting and lighting controls
- Improved system efficiencies

286. The development achieves a 10% reduction (for the domestic element) in overall carbon emissions over Part L 2013, through passive design and energy efficiency measures alone. . For the non-domestic element, there is an estimated reduction in regulated CO<sub>2</sub> emissions equating to a 16% reduction.

### Be Clean (supply energy efficiently)

287. A connection to a District Heat Network (DHN) provides a supply of low carbon heat to homes, businesses and public buildings. There is currently a single District Heat Network (SELCHP DHN) for Old Kent Road. SELCHP is a waste incinerator in Lewisham, which generates heat, and electricity that can be used to power homes. We support the delivery of further DHNs with low or net zero heat sources that use land efficiently. The draft AAP states that gas boilers are the largest source of carbon emissions within the borough, so new gas boilers in new developments will not be permitted unless they are an interim solution before a low carbon solution is implemented.

288. The network expansion of the SELCHP towards Old Kent Road is currently under development. Funding has been secured to bring forward the scheme from central government and a Local Development Order will be made within the next 9 months, which will secure the necessary consents to lay the pipe network through the Old Kent Road AAP area. Consequently, provision will be made for a future connection to the DHN and safeguarded routes and a safeguarded area will be provided for future connection. This will allow the whole development to connect to the future heat network. The London Heat Map shows that the proposed heat network is to go along St James Road and as such a soft punch point will be included in the design to allow future connection and space and a safeguarded route will be allowed for the plant connection.

289. The scheme design will be future proofed to allow connectivity to the SELCHP DHN when it becomes available in the future and would be secured through the s106 Agreement. At this stage, there would be no on-site Be Clean measures adopted in this scheme. The carbon savings at this stage would be 0%.

## Be Green (low or carbon zero energy)

290. ASHP's and Photovoltaic (PV) Panels are the green/renewable energy technologies have been considered suitable for the proposed development. The ASHP's has been suggested for the space heating, hot water and cooling systems. The PV panels would be placed on the roof adjacent to the communal terrace. The ASHP's and PV's are expected to provide a further 55% improvement over Part L 2013 (domestic element). As for the non-domestic element, there would be 35% reduction.
291. The overall regulated CO<sub>2</sub> savings on site against a Part L 2013 compliant scheme are therefore 65% for the domestic element and 51% for the non-domestic. In total, the scheme achieves a 64% emission reduction against a Building Regulations compliant scheme.
292. The proposed development complies with the London Plan CO<sub>2</sub> savings target of 35% overall. The proposed development also complies with Southwark Plan target of 40% for non-domestic element. However, it does fall short of Southwark's Local Plan target of 100% emission reduction against Building Regulations for the domestic element.
293. As noted above, if the development can connect to the DHN, the savings figure of 64% will substantially increase additional savings. For the development, without connection to the DHN, to achieve the full 'Zero Carbon' target on site a contribution to the Borough's carbon offset fund will be required. The carbon shortfall of 60.74 tonnes CO<sub>2</sub> per annum amounts to £173,109. The overall contribution has been agreed with the applicant, and the shortfall amount is secured in the S106 Agreement. The S106 Agreement will also include the obligation of requiring the development to be constructed in accordance with the Energy Assessment and review the feasibility of connecting to the DHN.

## Overheating

294. London Plan Policy SI4 and Policy P69 of the Southwark Plan 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).
295. The proposed development has been designed to reduce cooling demand and overheating risks. The submitted energy documents demonstrate that the proposed development residential dwellings and communal circulation spaces

comply with the requirements of CIBSE TM59:2017 when cooling is applied to living/kitchen/dining and bedroom spaces. In order to reduce the energy consumption associated with cooling, external balcony overhangs, internal blinds and reduced g-Value glazing are to be provided to reduce solar gain.

296. Whilst thermal comfort could be achieved when using natural ventilation, the acoustic report produced by RBA Acoustics concluded that acoustic requirements cannot be met with fully opened windows. As such, natural ventilation is not proposed to be taken forward to control thermal comfort. However, it should be noted that openable windows are still required for purge ventilation. No option, other than cooling, allows compliance with the thermal comfort requirements of CIBSE TM59:2017. Given the circumstances, this is acceptable and a condition to secure its installation is recommended, as this forms a key element of the schemes viability case as discussed earlier in this report. .

### **Whole life cycle and carbon capture**

297. 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.
298. A Whole Lifecycle Carbon (WLC) assessment has been undertaken for the proposed development. The GLA raises no objection to the assessment. The estimated whole lifecycle carbon emissions of the proposed development have been provided. A whole life cycle monitoring report has been requested by condition.

### **Circular economy statement**

299. 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.
300. A Circular Economy Statement has been submitted and addresses those 9 core principles that the GLA has set out in their Circular Economy Statement Guidance, which includes:
- Minimising the quantities of materials used,
  - Minimising the quantities of other resources used,
  - Specifying and sourcing materials responsibly and sustainably,
  - Design for longevity, adaptability or flexibility and reusability or recoverability,
  - Design out construction, demolition, excavation and municipal waste arising,
  - Manage demolition waste,
  - Manage excavation waste,
  - Manage construction waste, and
  - Manage municipal waste.

301. A planning condition requiring a Circular Economy Statement to be agreed in writing by the council prior to commencement of any works on site is recommended. 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.

## **BREEAM**

302. 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 preliminary BREEAM assessment for the Proposed Development was undertaken. The pre-assessment results demonstrate that the development is being designed to achieve a BREEAM New Construction rating of 'Excellent', in accordance with P69 of the Southwark Plan.

## **Digital connectivity infrastructure**

303. 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.

304. A pre-commencement 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.

## **Planning obligations (Section 106 Undertaking or Agreement)**

305. Southwark Plan Implementation Policy IP3 and Policy DF1 of the London Plan advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. IP3 of the Southwark Plan Aims to ensure that any potential adverse impact that makes a proposed development unacceptable will be offset is mitigated by using planning conditions in the first instance. Additionally, and where they meet the required tests, Section 106 legal agreements that either a) mitigates the impact or b) pay the council a financial contribution to enable the council to will be used to mitigate the impact. The NPPF

which echoes the Community Infrastructure Levy Regulation 122 which requires obligations be:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development

306. The application would be supported by the following Section 106 obligations:

<b>Planning obligation</b>	<b>Mitigation</b>	<b>Applicant's position</b>
<b>Residential</b>		
Affordable housing monitoring	£132.35 per affordable property, 153 x 132.35 =£20,249.55	Agreed
Affordable housing	Secure 49 as affordable housing.  To make the affordable units available before 50% of the private units can be occupied  Early-stage viability review	Agreed
Wheelchair housing	Securing and allocation of the wheelchair housing  15 Wheelchair units (3 x Social rented, 2 x Intermediate, 10 Private)  To market the private tenure wheelchair units to wheelchair users with appropriate locations and methods	Agreed
<b>Local Economy and Workspace</b>		
Employment (Construction phase)	32 sustained jobs to unemployed Southwark residents, 32 short courses, and take on 8 construction industry apprentices during the construction phase, or meet the Employment and Training Contribution.  The maximum Employment and Training Contribution is £154,400 (£137,600 against sustained jobs, £4,800 against short courses, and £12,000 against construction industry apprenticeships).	Agreed

Affordable workspace	Minimum 10% affordable workspace in Class E(g)(iii) use at £12 per sqft inclusive of service charge, insurance and VAT.  Appointment of workspace coordinator  Employment, Skills and Business Support Plan	Agreed
<b>Transport and Highways</b>		
Public Transport Infrastructure Contribution	<ul style="list-style-type: none"> <li>• Bus contribution of £413,100 (based on £2,700 per home)</li> <li>• A contribution towards the provision of a TfL Cycle Hire Docking Station £7,650</li> <li>• Three years membership for cycle hire £55,080</li> </ul>	Agreed
Highway works	s.278 works with the highway authority for highway works listed above, upgrade street lighting and traffic management change.	Agreed
Parking permit restriction	This development would be excluded from those eligible for car parking permits under the CPZ operating in this locality.	Agreed
Car club membership	Three year membership to new residents to car clubs operating in the area.	Agreed
Construction management plan review and monitoring	A detailed Demolition and Construction Management Plan (CMP) and a £40 per unit (£6,120) contribution for Construction Management within the OKR AAP area. This is for the council to manage cumulative impacts on the highways and environment.	Agreed
Delivery and Service Plan	Delivery and service plan monitoring of £15,700 (based on £100 per home for uplift, £100 per 500sqm non-residential floorspace).	Agreed
<b>Energy, Sustainability and the Environment</b>		
Futureproofing for connection to District Heat Network (DHN)	Prior to development, an 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
Achieving net carbon zero	An off-set payment of £173,109	Agreed

	<p>Review and re-calculation of on-site savings following detailed design stage</p> <p>Be Seen Monitoring</p> <p>Connection to SELCHP district heating system with agreement to continued use of the temporary strategy (which relies on gas) should there be delays with implementation of SELCHP in the area.</p>	
Archaeology monitoring/ supervision fund	Contribution towards cost of providing technical archaeological support (£11,171 for schemes over 10,000sqm)	Agreed
Achieving Greenfield rates	(£366 per cubic metre shortfall against greenfield run off rates)	Agreed
<b>Open space</b>		
Public open space	£156,825 (£205 per sqm shortfall)	
<b>Other obligations</b>		
Detailed design clauses	Securing of Weston Williamson Architects to deliver detailed design unless otherwise agreed in writing	Agreed
Estate Management Plan	Securing plan to ensure management and maintenance of public spaces and equal tenure access to the children's and communal play areas.	Agreed
Administration fee	Maximum contribution to cover the costs of monitoring these necessary planning obligations, calculated as 2% of total sum. (excluding the DSP and those contributions that are either separate monitoring contributions or a monitoring contribution is already being collected for this particular obligation)	Agreed

307. In addition to the financial contributions set out above, the following other provisions would be secured:

- Marketing, allocation and fit out of the commercial units to include lighting, cooling, heating, toilet, kitchen and three phase power supply.
- London Living Wage – best endeavours to being offered to all staff employed in the commercial units as well as workers during the construction period;
- Workspace Specification (including full M&E fit out);
- Triggers securing Practical Completion of workspace;
- Affordable Workspace Management Plan, including marketing requirements;
- Equal tenure access to the children's and communal play areas
- Public access to the public open space and management of the public realm within the scheme

- 24/7 public access of the new pedestrian route on completion of the masterplan to the west of the site.
  - Details of the community room including booking system
308. The S106 heads of terms agreed would satisfactorily mitigate against the adverse impacts of the proposed development.
309. In the event that a satisfactory legal agreement has not been entered into by 30 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 workspace and mitigation against the adverse impacts of the development through projects or contributions in accordance with Policy IP3 'Community infrastructure levy (CIL) and Section 106 planning obligations' of the Southwark Plan (2022), and London Plan (2021) policy DF1 'Delivery of the Plan and Planning Obligations', as well as guidance in the council's Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015)".*

## **Mayoral and Southwark Community Infrastructure Levy (CIL)**

310. 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.
311. The site is located within Southwark CIL Zone 2, and MCIL2 Band 2 Zone. Based on the GIA measurements obtained from the submitted CIL form 1 (dated 08-July-2022), the gross amount of CIL is approximately **£4,099,200.00** (pre-relief). Subject to the correct CIL forms being submitted on time, CIL Social Housing Relief of approximately £1,319,684.04 can be claimed for a number of types of affordable housing. Thus, the resulting CIL amount is estimated to be **£2,779,515.96** net of relief. It should be noted that this is an estimate, floor areas will be measured and checked when related CIL Assumption of Liability and Relief Claim Forms are submitted, after planning approval has been secured.

## **OTHER MATTERS**

312. None.

## **STATEMENT OF COMMUNITY INVOLVEMENT**

313. Consultation was carried out by the applicant prior to the submission of the planning, and during the consideration of the application. The consultation undertaken was carried out with the local community and key stakeholders from

the area. This is summarised in the tables below, which are taken from the submitted Statement of Community Involvement.

**Table: List of meetings and events**

Meetings	Date	Attendees
The Old Kent Road Community Review Panel	23rd November 2020	Community Review Panel
A newsletter giving details of the scheme and directing local residents to our dedicated website	Posted (1st Class) Monday 22nd March 2021. Delivered on Tuesday 23rd March 2021.	2734 copies of the newsletter were posted to the homes and businesses
Meeting with the Old Kent Road ward councillors	1st April 2021	Ward Councillors, officers, architects, agent, applicant.
March/April Online Public Consultation. A dedicated website went live  <a href="http://loomfactory.whattyouthink.co.uk">loomfactory.whattyouthink.co.uk</a>	Tuesday 23rd March 2021 – Tuesday 13th April 2021.	Public

314. A number of local community groups and residents' associations were also contacted, but no response were received.
315. Of the 2,734 addresses that were sent a newsletter giving details of the consultation,  
32.7% visited the website. However, of the residents who visited the website, only 3.4% completed the survey, with 2.7% leaving further comments. 94 respondents completed a survey. The survey had 5 main questions.
316. Of the 895 people who visited the website during the consultation process –  
  - 3.5% were supportive of the principle of development.
  - 2.1% were supportive of the architecture of the scheme.
  - 3.4% were supportive of the affordable homes provision.
  - 4.1% were supportive of the re-provision of the artists' quarter and commercial/industrial units.
  - 5% were supportive of the new route through the site.
317. The Applicant has provided responses to the main issues raised by Residents and Stakeholders in the SCI, which were mainly:

- Impact of construction;
- Height and massing (excessively tall and bulky);
- Impact on residential amenity (daylight/sunlight/privacy);
- Strain on public transport;
- Increase in local traffic and result in worse air quality.

## **Human rights implications**

318. This planning application engages certain human rights under the Human Rights Act 1998 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.
319. This application has the legitimate aim of delivering commercial and residential 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**

320. The major redevelopment of the site is supported and welcomed. The principle of a commercial/office scheme with housing on the site would be in line with policy aspirations within the draft OKRD AAP and OKR 11, and the site allocation NSP67 within the Southwark Plan.
321. Whilst the quantum of commercial floorspace is slightly below the existing, the internal servicing yard is much improved and is not included in that net internal area. The quality of the new space compared to the existing site, along with the introduction of Affordable Workspace to the ground floor unit is considered to be a major benefit of the scheme. The number of full time employees would increase on the site.
322. Recognising the changing character and uses carried out in the immediate area, it is not felt that any harm to existing businesses would arise by the introduction of housing. In light of this, it is considered that the principle of the proposed development should be supported in this instance.
323. The proposal would deliver a good standard of accommodation and would address the majority of standards as set out in the residential design standards. Each flat would have its own private balcony and there would be policy compliant communal amenity space and playspace. The overall mix of units would comply with the Southwark Plan policy and the affordable housing mix would have more family-size dwellings, including 4 bed flats
324. The building height proposed would represent a step change in the existing scale of the area, but as an Opportunity Area site, it is considered that the height proposed would be in accordance with the objectives of the London Plan, Southwark Plan and draft OKRD AAP in that it would optimise the development potential of the site without harming the character of the surrounding area and would help deliver the masterplan aspirations of the OKRD AAP. As such, the

proposed height would be compatible with the emerging townscape and heights of buildings. The design and materiality is considered to respond well to the existing character and surrounding context and the design guidance of the OKRD AAP.

325. 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. It is not considered that the loss would be significant. Any overlooking to neighbouring occupiers is minimised.
326. The improved public realm around the site and increased public permeability through to the future Six Bridges Estate is considered to be a public benefit. The refurbishment of the Roca building would bring this part of St James's Road back to life and provide a quality play area.
327. The proposed landscaping results in an increased UGF score of 0.41 meeting the London Plan target. Furthermore, biodiversity proposals would result in a net gain.
328. The proposal would provide cycle parking on site and upgrade the public realm, which would improve the pedestrian experience along this part of St James's Road.
329. The scheme would be designed to minimise environmental effects and adequate mitigation measures would be in place, which would be secured by conditions.
330. The scheme would achieve 64% carbon emission reduction site-wide against a Building Regulations compliant scheme, which is positive when compared with the extant scheme and would allow for a connection to the emerging DHN.
331. It is therefore recommended that planning permission be granted subject to conditions, and the applicant entering into a Section 106 Legal Agreement under the terms as set out above.

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

332. Greater London Authority (GLA) had made the following comments based on the scheme originally submitted. They did not provide revised comments at Stage 1. The GLA would provide any further comments in the Stage II report.  
Below are the key issues:
  - The principle of land use of housing, re-provision of employment space, and the provision of two new parks is supported subject to the application being able to be accommodated within the agreed limit on development.
  - Supportive of the affordable housing offer and is considered possible to follow the fast track route.
  - The proposed uses are in line with the Area Action Plan OKR11 Sub Area and comprise residential development, industrial and commercial space, a community room, a new community play area, and a new public route

through the site, which allows for future connectivity and permeability with the future emerging context. The proposals also look capable of successfully accommodating these uses with sufficient flexibility to allow for future change.

- The height of Building A is in keeping with the nearby Chancellor House to the south-east but are notably taller than the existing site building(s) and the immediate context. Over time, as the density of the area intensifies, the scale of the built form will sit well within the broader planned heights of the AAP tall buildings strategy of up to 40 storeys towards the south of the site. The tallest building – Building A - will mark a place of local importance and help assist wayfinding strategically in the short term, and locally in the longer term once the broader future masterplan emerges.
- The proposals work well in this transition site between the super block of the rebuilt Six Bridges estate and the finer grain of the historic buildings to be retained on St James's Road' as set out in the OKR AAP. The impact on the skyline, local context and surrounding communities has been carefully considered.
- GLA officers agree with the conclusions in the TVIA.
- The retention and upgrade of 330 St James's Street / Rocca Building – noted to be a building of 'Townscape Merit' in the AAP is supported.
- The architectural quality is thought to be well considered with the well documented site and context history offering logical prompts for materiality, fenestration and façade treatments that are appropriate to the local setting.
- The applicant should provide further justification as to why they are unable to provide the full private amenity space, particularly where some of the units only provide 4sq m or 6 sqm and single aspect and are within the affordable tenure mix.
- Further information should also be provided in relation to overheating to ensure acceptable conditions for the single aspect dwellings.
- The proposed scheme has a very high percentage of site coverage with little to nil building setbacks to the existing St James's Road or the future AAP proposed route to the west. Consideration should be given to whether there are further opportunities to for upgrading the proposed streetscape on St James's Road to provide trees or soft landscaping elements.
- The proposed width of the east-west play route / connection also appears narrow and the 'sunlight studies' within the landscape planning statement demonstrate how little direct sunlight this east-west connection will therefore receive.
- With hard landscaping occupying about 50 per cent of the width of the link, the applicant must ensure that this space is not "working too hard" and provides a high quality and durable environment for all.
- Doorstop play for 0-4 year olds should be prioritised and the council should secure a financial contribution for any shortfall.
- The application is supported by a Fire Safety Statement, which demonstrates that the majority of the requirements are addressed. The applicant should confirm that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.
- Concluded that the proposed development would result in less than substantial harm to the heritage assets themselves or their settings.

- It is understood that this site is identified as being in phase 1 (pre BLE). The need for a Grampian s106 obligation that would restrict implementation will need to be assessed at the planning application stage in light of the number of homes permitted by Southwark in the AAP area, at the time, in relation to the agreed limit on pre BLE development.
- Informed by the applicant's Active Travel Zone (ATZ) assessment and TfL's and Southwark's own work, appropriate mitigation of the development's impact and support active travel is justified. This should include refreshed and/or new Legible London signs. The proposed route through the site should be secured as public access 24/7. Active Travel Zone improvements are required.
- A contribution of £2,700 per residential unit is sought towards improvements to the bus network over a five-year initial period, commensurate with the impact of the development.
- Whilst the quantum of short and long stay cycle parking meets the minimum London Plan standards, the proposals do not accord with London Cycle Design Standards (LCDS), as also required by Policy T5.
- In line with the agreed approach in the Old Kent Road area a s106 contribution at a tariff of £50 per home should be secured towards the expansion of the TfL cycle hire network. To further support sustainable travel free membership of the scheme should be secured.
- Clarification should be provided as to how the demand for parking from disabled people could be met over and above this outset 3 per cent. If this is not possible, the applicant should meet this demand by encouraging other active modes such more disable cycle parking, increased contribution to bus network for step free access and /or further public realm improvements.
- The Class E use is also to be car-free and proposes two disabled persons' parking spaces, one on site and one on-street. Consideration should be given to removing the on-street space to reduce vehicle domination.
- To reduce vehicle domination and improve vulnerable users' safety and comfort consolidation of access into one should be actively considered.
- The council should confirm that the on-street arrangements for refuse collection are sufficient and if the proposed on street deliveries by larger vehicles and for those buildings not close to the shared service area/disabled persons' parking are acceptable.
- Separate note on energy is provided which goes into detail the technical requirements and further assessments required including overheating, modelling output sheets, connection to DHN as priority and confirming the carbon shortfall.
- No Whole Life-cycle Carbon (WLC) assessment has been submitted.
- A Circular Economy Statement has not been submitted.
- The applicant should review the urban greening proposed, seeking to improve the quality or quantity, to increase the application's UGF.
- The applicant should revise the drainage strategy to incorporate above-ground green SuDS to provide water quantity, quality, biodiversity, and amenity benefits.
- No water efficiency information has been provided for the residential components of the development.
- A ventilation strategy should therefore be produced which shows how exposure to poor air quality has been minimised.

Officer comment: Most of the comments above have been discussed in the main body of the report. The applicant had also addressed the majority of these (including those not listed above). The scheme has evolved since those comments. The applicant has submitted the various supporting documents required by the GLA and has improved the cycle parking provision. Conditions for cycle parking and conditions regarding WLC, CES and Energy have been secured by condition. A ventilation strategy could be secured by a condition.

333. Transport for London have made the following comments:

- As it stands, there is still space within the Phase 1 cap, but TfL continue to monitor the development projections, progress of applications and the number of units permitted. Grampian conditions will be applied to applications once the cap is met.
- A contribution of £2,700 per residential unit has been requested from all developers, to be able to increase capacity to mitigate the developments.
- To promote sustainable travel and offer walking routes in the future, TfL's request to maintain 24/7 access to be secured through the s106 remains. The Healthy Streets indicators to create a quality pedestrian environment should be considered in the landscaping plan for this route.
- Content that the numerical standards applicable to the previous London Plan are met and that we can accept that in this case in recognition of the constraints
- LCDS is clear that not everyone can use two-tier racks, and that more accessible stands should be provided for them (and this is separate from the requirement to provide stands for wider/larger cycles).
- An accurate, to-scale drawing should be provided to TfL prior to Stage 2 to assess compliance with the LCDS and Policy T5. It is recommended that compliance with the LCDS is also secured through a cycle parking condition.
- A commitment to providing step-free access across the site should be provided in the Car Parking Management Plan, secured through condition.
- Further discussions between the applicant and Southwark is recommended to consider the improvements identified in the updated ATZ assessment, particularly those highlighted along route 2 (South Bermondsey), where contributions towards improving the walking and cycling environment should be secured.
- A Construction Logistics Plan (CLP) including appropriate arrangements during site clearance should also be secured by condition and accord with Policy T7.
- A full Travel Plan should be secured through the appropriate mechanism in line with Policy T4.

Office Comment: Much of the above have been discussed in the main section of the report. The applicant had also met with TfL to go through some of the details in particular the cycle parking standards and that has been found acceptable. In terms of the contributions and conditions requested, these would be secured. The applicant argued that the proposed development would generate low rail use that could not justify the improvements to the route to South Bermondsey train station. The intention of producing a Healthy Streets compliant assessment is to identify

weaknesses and opportunity for improvements to the surrounding area, however it does not mean that the developer is to fund all potential improvements identified, particularly as the usage of such facilities may be very limited, given the scale of the individual development. Officers agree with this.

334. Environment Agency had made the following comments:

- consider that planning permission could be granted to the proposed development as submitted if the suggested planning conditions are included.
- there is a moderate risk of contamination and that further investigation is required.
- The proposed development will only meet the requirements of the NPPF if the following measure as detailed in the Flood Risk Assessment by Elliott Wood (dated 16 April 2021; ref.2200111) submitted with this application is implemented and secured by way of a planning condition on any planning permission.
- Recommend that flood resistant and resilient measures are incorporated in to the design and construction of the development proposals, where practical considerations allow, using guidance contained within the Department for Communities & Local Government (DCLG) document 'Improving the flood performance of new buildings: flood resilient construction'.

Officer Comment: The above is noted and conditions and informatics will be secured.

335. Argiva responded and confirmed no objections to the application.

336. Metropolitan Police Design Advisor:

A meeting was held 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, 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 very few alcoves or secluded areas that are often crime and ASB generators. Planted areas should be well lit and not planted too densely as weapons are often stashed in dense planting. The bottom of tree canopies should be maintained to be no lower than 2m and ground planting should not be allowed to grow any higher than 1m to ensure good lines of sight across the development are maintained. Lighting in the areas of public realm around the building should be designed to comply with public realm lighting standard BS 5489:2020.

Careful consideration should be given to how the play area will be lit and access rights/times of opening for use. These areas can become attractive for those wishing to commit crime or ASB if they are not secured at appropriate times. Each

floor should only be able to be accessed by persons who live on that floor or legitimate visitors to that floor.

Officer Comment: This is noted and conditions securing Secure by Design measures are recommended.

337. National Air Traffic Safeguarding Office had commented.

The development does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

338. Natural England had commented and made no objections.

339. Thames Water had made the following comments:

- Would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Should the Local Planning Authority be minded to approve the planning application, Thames Water would ask the following informative on Groundwater Risk Management Permit be attached to the planning permission.
- With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water there would be no objection.
- The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the condition in relation to piling be added to any planning permission.
- Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, there would not be any objection to the above planning application, based on the information provided.
- Water Comments. Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water requested that a condition in relation to additional flow/phasing plan be added to any planning permission.
- The proposed development is located within 15m of a strategic water main. Thames Water request that a condition relating to piling be added to any planning permission.
- The proposed development is located within 15m of our underground water assets and as such would like an informative be attached to any approval granted.

Officer Comment: The above is noted.

340. Community Review Panel

The scheme was presented to the Community Review Panel (CRP) at pre-application stage and their comments are summarised below:

- The panel is encouraged by the quality of design at this early stage, and makes a number of comments intended to assist further development of the proposals.
- The applicant's positive approach to understanding the needs of the local community is appreciated, and the panel endorses the need to carry out a programme of consultation to inform development of the scheme, including on the height of the tallest element.
- Further consideration of how tenures can be mixed, rather than separated, would be beneficial. The design team should consider in greater detail the nature of the proposed light industrial uses to ensure spaces suit a range of occupiers.
- There is broad support for a public route through the development; but the panel voices some concerns about the safety and security of publicly accessible areas. It also questions whether the public realm can accommodate all the types of activity proposed. While a connected street has benefits, it is unlikely to become a well-used through route until adjacent development takes place, and there is a risk that it could feel unsafe to residents after dark. A balance should be sought between enabling access, and creating an environment that feels safe.
- The panel feels that the podium space needs further thought to ensure it caters for all the activities proposed, and for all residents. Areas intended for different types of activity are located close to one another, for example grassed areas for relaxation adjacent to areas for children's play, and it is important that these can co-exist.
- The panel encourages the team to meet exemplar, rather than minimum standards on space, light, and noise insulation.
- The panel has particular concerns about the possible impact of noise – from flat to flat, and between the light industrial areas, the residential units and the amenity spaces – and asks that this be considered carefully.
- As well as the new public route, the panel suggests it is also important that the development's frontage on St. James's Road is activated, as it forms part of an important link between Old Kent Road and Southwark Park Road.
- The panel suggests that options should be explored to reduce the height of the tallest element. These could include bridging the public route with an archway element with accommodation above, which could enable a reduction in the number of storeys.
- The panel expresses a range of opinions about the overall design of the scheme and the proposed materials. It would welcome an architectural approach that seeks to create a balance between a distinctive design, which distinguishes the development from other recent blocks in the area, and one that reflects the architectural context.
- The panel also admires the proposed use of arches, and suggests they could be also included in the St. James's Road frontage.
- It was suggested that studio flats do not, in general, provide satisfactory accommodation, and their provision should be reconsidered.
- The panel suggests that the podium space may be under-used in the colder months of the year, and that an indoor/outdoor space could be created to maximise amenity all year round.
- The panel suggests consideration is given to providing other types of non-commercial space that will benefit residents and contribute to building a

functioning community. Options could include a youth club, community centre, or a co-working space. A Post Office would also be valued facility by the wider neighbourhood.

- The panel feels that the quality of the industrial spaces will prove key to the successful activation of the development.
- The panel suggests that it is not realistic to assume that all those working on the site will live within walking distance, and that parking provision will be needed for those who will drive to work.
- The panel suggests that cycle routes should be considered along St. James's Road, in discussion with Southwark Council, to create a more cycle-friendly context for the scheme.
- The panel looks forward to further detail on the provision of solar or other forms of renewable energy in the development.
- The panel supports the provision of local engagement programmes, including the potential for the creation of construction jobs during this phase of the scheme's development.

Officer comment: Much of the scheme has evolved from the above comments, but do take on board the CRP's views such as making the public route safer, adding de-sign features to break down the height and massing. The applicant has attempted to address most of the above and Officers have discussed this in the main body of the report.

### **Internal consultees**

341. The advice received from other Southwark Officers has been detailed in the relevant sections contained within this report.

### **SUPPLEMENTARY ADVICE FROM OTHER OFFICERS**

342. None.

## **BACKGROUND DOCUMENTS**

<b>Background Papers</b>	<b>Held At</b>	<b>Contact</b>
Southwark Local Development Framework and Development Plan Documents	Chief Executive's Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: <a href="mailto:planning.enquiries@southwark.gov.uk">planning.enquiries@southwark.gov.uk</a> Case officer telephone: 020 7525 5729 Council website: <a href="http://www.southwark.gov.uk">www.southwark.gov.uk</a>

## APPENDICES

No.	Title
Appendix 1	Recommendation (draft decision notice)
Appendix 2	Relevant planning policy
Appendix 3	Relevant planning history
Appendix 4	Consultation undertaken
Appendix 5	Consultation responses received

## AUDIT TRAIL

<b>Lead Officer</b>	Stephen Platts, Director of Planning and Growth	
<b>Report Author</b>	Wing Lau, Team Leader	
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Strategic Director of Finance and Governance	No	No
Strategic Director of Environment and Leisure	No	No
Strategic Director of Housing and Modernisation	No	No
<b>Date final report sent to Constitutional Team</b>		
1 December 2022		