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Item No. 7.1	Classification: OPEN	Date: 14 June 2023	Meeting Name: Planning Committee (Major Applications) B
Report title:	Development Management planning application: Application 22/AP/1603 for: FULL PLANNING APPLICATION Address: 18-22 PENARTH STREET, LONDON, SE15 1TX Proposal: Demolition of existing buildings and construction of a mixed-use part 8, part 9, part 10 storey building comprising of 4,195sqm of light industrial (Class E(g)(iii) use), studio and office (Class E(g)(i and ii) use) workspaces at ground and mezzanine floor levels with 283 co-living studios and supporting amenity facilities (Sui Generis use) and 47 (36.55% Affordable by habitable rooms) residential homes (Class C3 use) above, together with servicing arrangements, cycle parking, external amenity spaces, landscaping and associated works.		
Ward(s) or groups affected:	Old Kent Road		
From:	Director Of Planning And Growth		
Application Start Date	25/05/2022	Application Expiry Date	24/08/2022
Earliest Decision Date	11/08/2022		

RECOMMENDATION

1. a) That planning permission is granted, subject to conditions and referral to the Mayor of London, and the applicant entering into an appropriate legal agreement by no later than 13th December 2023.
2. b) In the event that the requirements of (a) are not met by 13th December 2023 that the Director of Planning and Growth be authorised to refuse planning permission, if appropriate, for the reasons set out at paragraph 312 of this report.

EXECUTIVE SUMMARY

3. The proposed development involves the demolition of the existing buildings on the application site at 16-28 Penarth Street and 118-120 Ormside Street in South

Bermondsey, followed by the construction of an integrated, mixed-use development comprising of full height light industrial, R&D and office workspace at ground and mezzanine floor levels together with residential co-living studios and supporting facilities on the floors above, and affordable housing in the form of 47 No. apartments ranging in size of 1, 2 and 3 bedrooms.

4. Caddick Developments and the existing industrial occupier, James Glancy Design Ltd, have submitted a joint development proposal, which seeks to significantly enhance the quality and usability of the employment space on the site, which in turn will strengthen and reinforce its role in supporting the economic function of the Old Kent Road Locally Significant Industrial Sites where industrial development is planned to be delivered alongside new homes.
5. The proposed development will utilise the shape of the existing site with a broadly T-shaped layout fronting Hatcham Road and Ormside Street. The proposal comprises an overall gross external area (GEA) of 22,044 sqm, with a gross internal area (GIA) of 20,044 sqm. The light industrial, R&D and office floor space will extend across the ground floor and mezzanine floor levels, thereby spanning across the extent of the existing site. A dedicated service access route is included within the site. Above the employment floor space, the proposed development will then be read as three separate blocks – Block A, Block B and Block C. The three blocks will be linked via a podium at first floor level, which will provide a series of external landscaped amenity spaces.
6. The proposals comprise one of the sites identified for delivery in phase 1 of Old Kent Road Area Action Plan and the application has been brought forward in accordance with the emerging policies of the Plan.
7. The scale and massing of the proposed development has been informed by the Council's massing model contained in the emerging Old Kent Road Area Action Plan. This provided the parameters for the design development process. The height of the proposed blocks also follows extensive pre-application consultation with Southwark Council and the GLA and was informed by a comprehensive analysis of the existing and emerging context, including site constraints, opportunities, and the relationship of the site with the street pattern and neighbouring buildings. Taller elements are concentrated on each street frontage and the corners, towards the outer edges of the building, opening-up within the eastern elevation, to break up the overall form and help provide good levels of daylight and sunlight within and around the scheme. Roof heights vary between the blocks to add visual interest and produce a varied parapet level and skyline.
8. The proposed employment floor space is designed to meet the needs of James Glancy Design Ltd who proposes to reoccupy the space and a range of small creative businesses that will use the space and form a creative hub. A minimum 4.5m floor-to-ceiling height will be maintained throughout the ground floor to ensure that light industrial uses can be appropriately accommodated, with the mezzanine providing a further level with a floor-to-ceiling height of 3.4m. The proposed development will provide a total of 4,195sqm of new employment floor space, a net increase which

compares to the 3,797sqm of employment floor space on the existing site. In addition to the net increase in employment floor space, the usability and functionality of the workspaces will be greatly enhanced, thereby facilitating an intensification in employment numbers across the Site. A comparison between the existing and proposed employment floor space is summarised as follows:

	Existing Commercial Gross Internal Area	Proposed Commercial Gross Internal Area
Ground Floor	2,081 sqm	2,361 sqm
Mezzanine Floor	759 sqm	1,834 sqm
First Floor	611 sqm	-
Church (Temporary Use)	346 sqm	-
Total	3,797 sqm	4,195 sqm

9. The proposed development will also provide 283 No. co-living studios (Sui Generis use), together with 1,259 sqm of related internal amenity space.
10. The proposed co-living component aims to create a long-term, sustainable residential community within the building. The Applicant's intention is to create an environment where the tenants rent for an extended period of time, to ultimately establish roots locally and settle within the Borough. The proposed development is designed to achieve this vision, with a strong emphasis on communal spaces and social interaction, connecting the work environment at ground and mezzanine levels with the residential environment above, forming a single integrated community that also reaches out to the wider community within the area.
11. Co-living accommodation is a relatively new form of housing which provides one-person studios for rent with an emphasis on high-quality shared facilities and amenity spaces within a fully managed environment. It suits those who want independence but also wish to be part of a wider community that provides a greater degree of contact, social interaction and inclusion. It is supported by a range of on-site amenities, including residents' lounges, café, gym and other facilities.
12. The co-living accommodation will be located in Blocks A and B, with a mixture of standard studios (20 sqm) and accessible studios (29 sqm) distributed within the blocks, as follows:

Block A	Standard Studios 20 sqm	Accessible Studios 29 sqm
Level 01	19	4
Level 02	19	4
Level 03	19	4
Level 04	19	4
Level 05	19	4
Level 06	19	4
Level 07	8	4
Level 08	10	4
Totals	132	32
Block B	Standard Studios 20 sqm	Accessible Studios 29 sqm
Level 01	8	-
Level 02	25	-
Level 03	21	-
Level 04	21	-
Level 05	21	-
Level 06	21	-
Totals	117	-

13. The co-living accommodation will comprise a combined total of 1,259 sqm of internal amenity space, which is equivalent to 4.45 sqm of amenity space per resident.
14. The proposals also include 47 No. affordable homes in a mix of 1-, 2- and 3-bedroom apartments (Class C3 Use), which are designed to meet local needs and equivalent to a policy compliant 35% of homes of which 26.35% will be for social rent and 10.35% intermediate housing. More specifically, the 47 No. affordable homes represent a total

of 36.7% affordable accommodation by habitable room, as part of the overall mix of co-living and conventional residential accommodation across the scheme.

15. The affordable homes will be located in Block C, with a mixture of one, two and three bedroom homes as follows:

16.

Block C	1- bedroom 2-person	2-bedroom 4-person	3-bedroom 4-person	3-bedroom 5-person	3-bedroom 6-person
Level 01	2	3	1	1	
Level 02	2	3	-	2	
Level 03	2	3	-	2	
Level 04	2	3	-	2	
Level 05	2	3	-	2	
Level 06	-	3	-	2	1
Level 07	-	3	-	2	
Totals	10	21	1	13	2

17. The proposed development includes a hierarchy of external spaces, which provide a mix of private and shared amenity spaces. The affordable homes in Block C will have access to private gardens and balconies. Inset balconies are proposed along the outer edges of the building to provide an additional level of privacy from Ormside Street, whilst projecting balconies are proposed on the internal facade which looks out onto the podium level. The proposed flats at first-floor podium level will have access to private garden spaces adjacent to the external amenity space, whilst the flats on the floors above will each have private balconies.
18. The podium level amenity space includes both private amenity space adjacent to the first level of residential accommodation and a shared amenity space beyond. This provides security and privacy for those dwellings that frame the space. Beyond this, within the central part of the podium area, there is a multi-functional, accessible garden space, framed by seating, which is shared with residents of the co-living accommodation. This arrangement is replicated on the co-living frontage to similarly provide privacy to the opposing studios and amenity/workspaces, while providing an equality of access to the podium amenity area for occupiers.
19. At first-floor level, it is proposed that the central podium area will serve as landscaped open space for each of the blocks. The podium level open space is envisaged as a focal point for the development combining a series of spaces with differing characteristics, which cater for different uses and activities.

20. The affordable residential homes in Block C have access to a dedicated roof garden, which will accommodate a combination of amenity space, growing areas, seating and a large area of multi-function children's play space. A total of 201 sqm of children's play space is proposed, including 141 sqm for the 0-4 age group and 60sqm for the 5-11 age group.
21. The two co-living blocks (Blocks A and B) will also be served by their own shared rooftop amenity spaces. There will be an external amenity space at second floor level comprising an area of 83 sqm, which overlooks Hatcham Road.
22. A car-free approach is proposed for the development, reflecting a sustainable transport strategy. This is with the exception of 3 No. disabled parking spaces on Hatcham Road to serve the co-living studios in Blocks A and B, together with 2 No. disabled parking spaces on Ormside Street to serve the affordable housing in Block C. The proposals will include 399 No. cycle parking spaces for the commercial, residential and co-living components of the development.
23. The proposed development includes a 56% on-site CO2 reduction beyond Part L of the Building Regulations, with the domestic and non-domestic elements of the building achieving more than 10% and 15% CO2 savings through energy efficiency measures alone.
24. The following is a summary of the existing and proposed figures for Urban Greening Factor, surface water run-off rates, and cycle parking provision.

	Existing	Proposed	Change +/-
Urban Greening Factor Score	Negligible	0.15	+ 0.15
Surface Water Run-Off Rate	35.95 l/s	2.3 l/s	- 33.65 l/s
Residential Long-Stay Cycle Parking Spaces	0	89	+ 89
Co-Living Long Stay Cycle Parking Spaces	0	282	+ 282
Commercial Cycle Parking	20	18 long-stay 6 short-stay	+ 4

25. The following table demonstrates the Community Infrastructure Levy and S106 contributions from the proposed development.

26. CIL (pre-relief) and S106 contributions

SCIL (estimated)	£3,419,837.95
MCIL (estimated)	£1,048,476.35
S106	See planning obligations table at paragraph 308

BACKGROUND INFORMATION

Site location and description

27. The subject site comprises of a T-shaped series of buildings including an operational warehouse, offices and a place of worship with frontages onto Hatcham Road on the eastern boundary, Penarth Street at the northern boundary, and Ormside street on the western boundary. The site is circa 0.4 hectares with the existing buildings being a mix of one and two storeys in height. The principal element of the site is a two-storey brick building fronting Ormside Street which currently houses the design and manufacturing studio occupied by James Glancy Design Ltd. There are also a number of single storey factory spaces with an equivalent height of two storeys that are constructed of corrugated metal and service yards which are enclosed by a short brick perimeter wall topped with metal lattice fencing and barbed wire.
28. The existing building at 118-120 Ormside Street is occupied by the New Jerusalem Parish Church, which has operated under a series of temporary planning consents. The established lawful use of the building is Light Industrial and General Industrial (Class E (g) (iii) / Class B2). The Church intends to vacate the premises and will be moving to new permanent accommodation elsewhere. A letter from the New Jerusalem Parish Church along with this application confirming their intention to vacate the site.
29. The existing buildings within the subject site comprise a combined gross internal area of 3,797sqm, including 346 sqm currently occupied by the New Jerusalem Parish Church. The surrounding area is generally characterised by light industrial units, offices, and storage and distribution warehousing. The prevailing building heights are low-rise and generally up to two industrial storeys in height.
30. The plot to the immediate northwest of the Site is occupied by Diespeker & Co, which is a business that supplies and installs terrazzo, marble and other quality stone for the commercial and residential sectors. The western side of Ormside Street comprises a number of industrial uses, including a large timber scaffolding yard and facility. Beyond this to the west is the Veolia Integrated Waste Management Facility, which occupies a significant built footprint and comprises a series of fully enclosed industrial units housing their waste operations. No waste operations occur outside of these buildings.

31. Also to the west is a large sub-station and other employment uses. To the south, the area around Manor Grove and Patterdale Road which is the northern edge of the Tustin Estate which is currently undergoing an extensive redevelopment project pursuant to planning permission 22/AP/1221.
32. The subject site is located within Sub Area 4 (Hatcham, Ilderton and Old Kent Road (South) and specifically within Site Allocation OKR 16) of the Old Kent Road Area Action Plan (OKR AAP). The site is designated as a Strategic Protected Industrial Land (SPIL) as per Southwark's current Proposals Map and as a Strategic Industrial Location (SIL) as per the adopted London Plan 2021.
33. The site is within an Urban Density Zone and an Air Quality Management Area. The site is located in Flood Zone 3 as identified by the Environment Agency. Additionally, the site is designated as being within the North Southwark and Roman Roads' Tier 1 Archaeological Priority Area. The site is not within a Conservation Area, nor are there any listed buildings on or within close proximity to the site.
34. 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 1b/2 on the PTAL system indicating poor accessibility to public transport.
35. Safeguarding still remains for the future provision of the BLE.

space will extend across the ground floor and mezzanine floor levels, thereby spanning across the extent of the existing site. Above the employment floor space, the proposed development will then be read as three separate blocks – Block A, Block B and Block C.

38. Block A is located at the north-eastern part of the site and will front onto Penarth Street and Hatcham Road. Block A will include 8 No. floors of co-living accommodation, comprising a total of 164 No. one-person studios, and rooftop amenity space. Block B is situated at the south-eastern part of the site and will front onto Hatcham Road. Block B will include 6 No. floors of co-living accommodation, comprising 117 No. one-person studios, and rooftop amenity space. The co-living buildings (Blocks A and B) also have access to a shared 83 sqm amenity space on the second floor that overlooks Hatcham Road.
39. Block C occupies the western part of the site and will front onto Ormside Street. Block C will include 7 No. floors of affordable residential accommodation, comprising 47 No. self-contained flats. The three blocks will be linked via a podium at first floor level, which will provide a series of external amenity spaces. Additional amenity space and children's play space is proposed at the rooftop level of Block C.
40. Cycle Parking will be provided in accordance with the London Plan and New Southwark Plan requirements. 399 no. secure cycle parking spaces are proposed for future residents of the development. The cycle store for the co-living accommodation is located at mezzanine levels between Blocks A and B and will be accessible via the lifts and stairs in Core B1. This provision comprises of 282 No. cycle parking spaces. The cycle store for the conventional residential accommodation will also be located at mezzanine level in Block C and is accessible via the lifts and stairs in Core C1 with the provision of 89 No. cycle spaces. Commercial cycle spaces and short stay cycle spaces are located at ground floor level.
41. The proposed development is to be car-free with the exception of 3 No. disabled parking spaces on Hatcham Road to serve the co-living studios in Blocks A and B, together with 2 No. disabled parking spaces on Ormside Street to serve the conventional housing building of Block C. Occupants of the development who are Blue Badge holders would be eligible for a Residents Parking Permit.
42. The two co-living blocks will be served by refuse storage facilities at ground floor level. One refuse store will be located adjacent to Core A1 at the northern end of Block A, whilst a second refuse store will be located adjacent to Core B1 at the northern end of Block B. The conventional housing block will be served by refuse storage facilities at ground floor level.
43. The development proposes 36.7% affordable housing by habitable room (163 of 444 habitable rooms in the development) comprising of 26.35% social rent (117 habitable rooms), and 10.35% intermediate (46 habitable rooms) across the site. The entire 47 No. homes located in Block C form the affordable housing offer of the scheme, and are provided in 1 bed, 2 bed and 3 bed options. Intermediate homes will be

accommodated on the first and second floors with the social rented homes provided on the third to seventh floors of the scheme.

Table: Proposed land uses

Land Use	Use Class	GIA
Residential	C3	15,865sqm
Commercial	E	4,195sqm

Revisions and Amendments

44. Whilst no design or alterations to the total number of residential units has occurred during the lifespan of this application, additional information regarding some areas of assessment was submitted. The documents were submitted in light of comments received from consultee comments. In acknowledging the further documents, the nature of the information received re-consultation of the scheme was not required.
45. The documents of additional information submitted during the course of this application were as follows:
 - Design Response Document to GLA Stage 1 Report (prepared by Child Graddon Lewis Architects);
 - Planning Response Document to GLA Stage 1 Report (prepared by Union4 Planning);
 - Updated Planning Drawings (prepared by Child Graddon Lewis Architects);
 - Inclusive Design Statement (prepared by Union4 Planning and Child Graddon Lewis Architects);
 - Updated Fire Statement (prepared by OFR Consultants);
 - Gateway One Fire Statement (prepared by OFR Consulting);
 - Updated Operational Management Plan (prepared by Moda);
 - Urban Greening Factor Drawing and Calculations (prepared by Gillespies);
 - Preliminary Ecological Appraisal (prepared by Middlemarch Environmental);
 - Preliminary Bat Roost Assessment (prepared by Middlemarch Environmental);
 - Biodiversity Metric Assessment (prepared by Middlemarch Environmental);
 - Updated Flood Risk and Drainage Strategy (prepared by Lyons O'Neill);
 - GLA Whole Life Carbon Assessment (prepared by Wallace Whittle);
 - Updated Energy Assessment (prepared by Wallace Whittle);
 - Supplementary and Daylight and Sunlight Analysis (prepared by Watts);
 - Circular Economy Statement (prepared by Wallace Whittle);
 - Operational Waste Management Plan (prepared by RPS Group);
 - Updated Noise Impact Assessment (prepared by Hann Tucker).

Consultation responses from members of the public

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

Tables: Public comments on the development

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

Three representations have been received raising concerns whilst also supporting the proposed development. The nature of the representations are summarised in the table below.

Concern	Officer Response
<p>The submitted Noise Impact Assessment (NIA) does not name or acknowledge the presence of the grassroots music venue, Ormside Projects and therefore does not fully account for the Agent of Change principle found within the National planning Policy Framework. As such, a new NIA should be conducted for all levels of the development with timing discussed with the grassroots venue and the survey should represent worst case scenario of a capacity event to show the venue at their fullest potential within the bounds of their license. The assessment would then need to guide the design of the building to be considered in line with LBS</p>	<p>An updated NIA has been submitted and is assessed within the main report.</p>

requirements and to meet LBS policy P66.	
Understands the need for residential accommodation and has concerns for the implementation of the scheme as it relates to the noise of existing business operations and how the new residential would be impacted. As such, a new NIA should be provided because there is concern as to the accuracy of the original acoustic baseline survey that was undertaken. This would allow the designers of the scheme to properly identify and mitigate the scope of the activities which could result in design changes to the orientation of the balconies as amenity spaces and most importantly, the acoustic performance of the envelope to any internal residential spaces.	An updated NIA has been submitted and is assessed within the main report.
Broadly supports the application but has concerns about the height of the development; inadequate parking provision; loss of light; loss of parking; and being an over-development	The issues of building height, car parking, impact on neighbouring occupiers; the development of the site are dealt within the main report.

Several representations have been received supporting the application: summaries and extracts of which are provided below:

Supports mixed use nature of the scheme in particular the commercial uses and potential to improve the local economy.	Noted and welcomed.
Supports the co-location of the scheme and the importance of delivering industrial space that will support the City and Southwark in particular.	Noted and welcomed.
The application will bring much needed vitality and activity to the area and it will generate activity in the immediate economy. The Council needs to consider this development in conjunction with the CPZ by prioritising the needs of	Noted and welcomed.

<p>established businesses where sufficient parking for business is provided. Attention should be paid to traffic calming, lowering speeds of service vans and scooters and parking control that is properly enforced.</p>	
<p>The building proposed here takes account the financial vulnerability of the young creative community. It gives multiple levels support, including living accommodation, industrial space for making and space for community to develop wider ideas. Like a coral reef this new building will sustain a young, ever changing creative community, contributing to the local community and the wider London creative culture and economy.</p>	<p>Noted and welcomed.</p>
<p>The proposed outcome is not too far from the original intention and is still wholly sympathetic to the AAP. Is pleased that James Glancy will be reoccupying the ground floor space..it is fortunate..that older industrial estates such as this one can co-exist with the introduction of a residential element...The concept of co-living is established in a number of locations throughout the UK and appears popular. If the area is to step change it needs to provide places to live which people will want to live in. The new neighbourhood needs to be empowered and feel relevant with the types of housing that are appealing to a younger generation.</p>	<p>Noted and welcomed.</p>
<p>The proposed development re-instating the light industrial quotient and offering a percentage to businesses at affordable rates is imperative. Having an anchor in the form of James Glancy will help the businesses to feel supported and well managed. The service route being shown underneath is a positive design feature of the plans.</p> <p>The need for quality accommodation in London, and Southwark in particular,</p>	<p>Noted and welcomed.</p>

<p>cannot be overstated..there should be a mixture of tenures because this will bring different age groups and interests into the mix. If the area is to succeed it needs to be relevant to a wide community.</p>	
<p>The scheme is exemplary and I very much hope that it will be granted permission to proceed. If built, I believe, that this development will be an impressive proof that industrial and residential use can be co-located in a way that works well, and that this will make for a better city.</p>	<p>Noted and welcomed.</p>

KEY ISSUES FOR CONSIDERATION

Summary of main issues

47. The main issues to be considered in respect of this application are:

- Equalities Impact Assessment
- Principle of the proposed development in terms of land use;
- Opportunity Area;
- Industrial land;
- Affordable workspace;
- Old Kent Road Phasing;
- Provision of housing;
- Affordable housing;
- Development viability;
- Design issues including site layout, tall buildings and heritage considerations;
- Landscaping, trees, biodiversity, and urban greening;
- Housing mix;
- Density;
- Quality of residential accommodation;
- Designing out crime;
- Private, communal amenity space, children's play space & public open space;
- Impact of proposed development on amenity of adjoining neighbours and surrounding area;
- Transport;
- Archaeology;
- Refuse and waste;
- Wind and microclimate;
- Fire strategy;
- Flood risk and water resources;

- Ground contamination;
- Air quality and noise;
- Energy, sustainability and digital connectivity;
- Whole Life-Cycle and Circular Economy;
- Health Impact Assessment;
- Planning obligations; and
- Mayoral and borough community infrastructure levy

Legal Context

48. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. In this instance the development plan comprises the London Plan 2021, the Southwark Plan 2022 and the draft Old Kent Road Area Action Plan 2020.
49. There are also specific statutory duties in respect of the Public Sector Equalities Duty which are highlighted in the relevant sections in the overall assessment at the end of the report.

EQUALITIES

50. The Equality Act (2010) provides protection from discrimination for the following protected characteristics: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership. Section 149 of the Equality Act 2010 places the Local Planning Authority under a legal duty to have due regard to the advancement of equality in the exercise of its powers, including planning powers. Officers have taken this into account in the assessment of this application and Members must be mindful of this duty, inter alia, when determining all planning applications. In particular Members must pay due regard to the need to:
 - Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act; and
 - Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
 - Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
51. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.
52. The Strategic Housing Market Assessment (SHMA) prepared on behalf of a number of South East London boroughs states that Southwark, together with Lewisham, has the most ethnically mixed population in the South East London sub-region. Compared to the population at large a very high proportion of Black households (70%) are housed in the social/affordable rented sector. These groups could therefore stand to benefit

from the proposed affordable housing, which would include social rented units. The provision of communal amenity spaces to be shared by different tenures would also contribute to the potential for increased social cohesion. This is a positive aspect of the scheme.

53. 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. Existing businesses may also relocate to the new development. There is a church on site that serves a predominantly BAME community that would relocate.
54. The New Jerusalem Parish Church has advised of its wish to vacate the premises and will be moving to new permanent accommodation elsewhere that better suits their needs. A letter from the New Jerusalem Parish Church is provided under Appendix A of the submitted Inclusive Design Statement. The letter sets out the Church's position and their plans for relocation. The relocation of the Church from the subject site to a new premises is not expected to result in negative impacts for the Church's attendees.
55. Travellers are a group with protected characteristics. The closest Travellers site to the proposed development is located close to the junction with Rotherhithe New Road and Ilderton Road. The distance between the Travellers site and the subject site is circa 430 metres to north. Given the sufficient separation distance it is therefore considered that no adverse impacts would occur to this group.
56. The proposed development would also generate additional opportunities for local employment. The proposed development would deliver increase the amount of commercial floor space from 3,797 sqm to 4,195 sqm. The new floor space will provide more efficient layout for future occupiers to operate in and is considered to be a significantly positive aspect of the development proposal.

Conclusion on Equality Impacts

57. The proposed development would not result in any adverse equality impacts in relation to the protected characteristics as a result of the proposed development.

Environmental Impact Assessment

58. The European SEA Directive is transposed into UK law by the Town and Country Planning (Environmental Impact Assessment) (Amendment) Regulations 2017. The Regulations set out the circumstances under which development needs to be underpinned by an Environmental Impact Assessment (EIA). Schedule 1 of the Regulations set out a range of development, predominantly involving industrial operations, for which an EIA is mandatory. Schedule 2 lists a range of development for which an EIA might be required on the basis that it could give rise to significant environmental impacts. Schedule 3 sets out that the significance of any impact should include

consideration of the characteristics of the development, the environmental sensitivity of the location and the nature of the development.

59. The development is not considered to constitute EIA development, based on a review of the scheme against both the EIA Regulations and the European Commission guidance. However, consideration should be given to the scale, location or nature of development, cumulative impacts and whether these or anything else are likely to give rise to significant environmental impacts. This application proposes the redevelopment of a brownfield site for the purposes of residential and commercial uses. Its scale is appropriate to its urban setting and it is unlikely to give rise to any significant environmental impacts

PRINCIPLE OF DEVELOPMENT IN TERMS OF LAND USE

Opportunity Area

60. The site is located within the Old Kent Road Opportunity Area (close to the Central Activities Zone) where the London Plan recognises the potential for “significant residential and employment growth” to be realised through a suitable planning framework that optimises development in conjunction with improvements to public transport accessibility
61. The Old Kent Road Area Vision of the Southwark Plan 2022 sets out the overall vision for the Old Kent Road. The policy says development should:
- Deliver direct benefits to the existing community including new and improved homes including new council homes, schools, parks, leisure and health centres, and the creation of jobs;
 - Promote car free development and support the Bakerloo Line extension, electric buses, taxis, commercial vehicles and cycling which will help to tackle air and noise pollution;
 - Help foster a community in which old and young can flourish;
 - Build new homes that come in a range of types from terraced houses to apartments with a high design quality including generous room sizes, high ceilings and big windows to ensure people have space to think and to rest;
 - Link existing open spaces like Burgess Park to each other and new park spaces;
 - Demonstrate excellent standards of environmental sustainability including pioneering new district heating networks to reduce carbon emissions, measures to tackle poor air quality and sustainable urban drainage systems to reduce flood risk.
62. The Old Kent Road Area Vision also states that the Old Kent Road Area Action Plan (OKR AAP) will set out the physical framework that will enable the community to realise its potential. The council is in the process of preparing this Area Action Plan for Old Kent Road which proposes significant transformation of the Old Kent Road area over the next 20 years, including the extension of the Bakerloo Line with new stations along

the Old Kent Road towards New Cross and Lewisham. A further preferred option of the Old Kent Road AAP (Regulation 18) was published in December 2020. As the document is still in draft form, it can only be attributed limited weight.

Purpose built shared living

63. Southwark Policy P6 requires shared living developments to provide at least 35% of conventional affordable housing by habitable room as a first priority. Where affordable housing cannot be provided on-site a cash payment towards the delivery of new council homes will be required. The value of any contributions will be based on the cost of meeting an on-site affordable housing requirement and should provide no financial benefit to the applicant. Policy H16 of the London Plan recognises the need for shared living developments within London. In accordance with Policy H16, large-scale shared living accommodation must comply with a ten step criteria. The ten step criteria is as follows:

It is of good quality and design

64. The co-living spaces comprise of private studios alongside a range of internal and external communal spaces. The development incorporates communal amenity spaces, cinema rooms and events rooms.

It contributes towards mixed and inclusive neighbourhoods

65. The co-living aspect of this development will be the first of its kind within the OKROA. It would be able to provide a significant number of single occupant homes in the area at a more affordable rate for single income earners. Whilst at the same time providing affordable housing in a mix of unit sizes and tenures.

It is located in an area well-connected to local services and employment by walking, cycling and public transport, and its design does not contribute to car dependency

66. A Transport Assessment has been submitted in support of the scheme. It demonstrates that the site currently has a low PTAL rating of 1b/2. However, given its location in an opportunity area, with good accessibility to a range of facilities and the intention to extend the Bakerloo Line into OKRD and build a new London Overground station approximately 350 metres to the east of the Site it is considered to meet this criteria.
67. The extension of the Bakerloo Line would undoubtedly increase public transport accessibility for the site. The development of the district centre based on the Old Kent Road will further enhance the range of services and facilities. It is therefore expected that the PTAL rating of the Site will increase in the future. Furthermore, the area is adequately serviced by bus and existing overland train stations nearby.
68. The proposed development includes the provision of safe and secure cycle parking to encourage the use of sustainable modes of transport, and is also designed as a car-

free development. The proximity of the development to Ilderton Road will enable cyclists to take advantage of the proposed CFR 12 route that will be situated on Ilderton Road. It is therefore considered that the development would not contribute towards car dependency.

Single management

69. The co-living aspect of the development accommodation will be operated and managed solely by Moda Living. Moda are an established operator of build-to-rent and other similar products and are trusted by established investment funds. An Operational Management Plan has been submitted with the application setting out how Moda Living will provide long-term management and operate the day-to-day management of the co-living accommodation.

Its units are all for rent with minimum tenancy lengths of no less than three months

70. The co-living studios will be available for rent only with minimum tenancy lengths of three months. Reduced rents may be offered to those who are seeking to live in the building for six months or more, thereby encouraging longer tenancies.

Communal facilities and services are provided that are sufficient to meet the requirements of the intended number of residents and include communal kitchens, internal and external amenity spaces, laundry and drying facilities, a concierge and bedding/linen changing

71. The co-living aspect of the development will be served by a range of communal facilities to serve the needs of the residents. At mezzanine level, there is a proposed residents' gym comprising a gross internal floor area of 100 sqm. At first floor level, co-working spaces comprise of 173 sqm, with 245 sqm of amenity facilities that consists of; a cinema, meeting room, events space, laundry room, activities space, and quiet areas.
72. Additionally, residents of the co-living accommodation will also have access to a number of communal kitchens within Blocks A and B that provides further cooking facilities and an opportunity to mix with other residents. Block A will comprise a total of seven communal kitchens, each comprising a gross internal floor area of 42 sqm. Block B will comprise a total of five communal kitchens each with a gross internal floor area of 39 sqm.
73. The internal amenity space of co-living accommodation is 1,259 sqm, which is equivalent to 4.45 sqm of amenity space per resident. The submitted Design and Access Statement provides a comparison between the proposed levels of amenity space with what might normally be expected in other rental properties available to single occupants. This demonstrates that the level of amenity space in the proposed scheme exceeds the level of amenity provided by traditional house and flat shares or other forms of accommodation. It, therefore, provides a good standard of residential accommodation.

The private units provide adequate functional living space and layout, and are not self-contained homes or capable of being used as self-contained homes

74. The co-living accommodation will include 249 No. studios, which are of a standard size of 20 sqm each. The development will also include 32 No. wheelchair accessible studios comprising individual floor areas of 29 sqm each. Each co-living studio will be a one-person unit comprising of en-suite bathroom, double bed, wardrobe, kitchenette, and dining/living area.
75. The proposed co-living studios would not comply with the legal definition of a dwelling in that they would not separately contain all of the facilities required for day-to-day domestic living and, as such, are incapable of being used as self-contained homes. They are clearly designed for co-living with shared amenity facilities.. In this regard, the proposed studios are defined as a Sui Generis use class of shared living accommodation.

A management plan is provided with the application

76. As mentioned previously in this section of the report, Moda Living will be the management company of the co-living aspect of the development. An Operational Management Plan has been submitted with the application setting out how Moda Living will provide for the day-to-day management of the co-living accommodation and ensure the long-term quality of the development in a way that supports the community.
77. The submitted Operational Management Plan has been prepared with reference to Policy H16 and Paragraph 4.16.4 of the London Plan which states that the Management Plan for a shared living development should include detailed information on the security and fire safety procedures, move in and move out arrangements, the maintenance of internal and external areas, how communal spaces and private units will be cleaned, and how deliveries servicing the development will be managed.

It delivers a cash in lieu contribution towards conventional C3 affordable housing

78. Policy H16 of the London Plan 2021 states that Co-living accommodation is required to contribute to affordable housing. On the basis that it does not meet minimum housing space standards, it is not considered suitable as a form of affordable housing.. In line with the aspirations of Southwark Plan Policy P6, shared living developments as a first priority should provide at least 35% of conventional affordable housing by habitable room as a first priority. The proposed development has incorporated a conventional housing block within the scheme providing 47 No. residential units at 36.7% affordable housing by habitable room. Given the above, a cash in lieu payment is not required.

Industrial land

79. The application site is identified within the Southwark Plan 2022 (Policy P29) as a Locally Significant Industrial Site (LSIS). The objective of this designation is for LSIS sites to be intensified for residential and industrial co-location. In addition, the site is also within the boundaries of Site Allocation NSP70 '*Hatcham Road and Penarth Street and Ilderton Road*' of the Southwark Plan 2022. NSP70 requires developments to:
- Provide new homes (C3); and
 - Provide at least the amount of employment floor space currently on the site (E(g), B class); and
 - Provide industrial uses (E(g)(iii) or B8 use class); and
 - Provide public open space - 1,990 sqm.
80. The redevelopment of the site would accommodate 47 No. conventional residential units alongside 283 No. co-living units, an increase of 379 sqm on the existing provision of employment floor space on site. The subject site is identified in the OKR AAP as a site that does not need to contribute towards the overall goal of 1,990 sqm of public open space for the NSP70 allocation, through the provision of open space on the site. It would however be expected to make in lieu financial contributions as set out in AAP11 of the draft OKRAAP at the equivalent 5sqm of space for each dwelling.
81. Policies E4 and E7 of the London Plan support the intensification and improvement of industrial uses on existing employment sites in order to ensure a sufficient supply of industrial capacity across London. The proposed development would cater for light industrial uses within the overall commercial provision proposed within the scheme.
82. The Old Kent Road was designated as an Opportunity Area through the previous iteration of the London Plan, with an indicative capacity of 1,000 new jobs and a minimum of 2,500 new homes. This has however, been increased to an indicative capacity of 12,000 homes in the New London Plan (2021). The London Plan notes that the emerging OKR AAP should "*set out how industrial land can be intensified and provide space for businesses that need to relocate from any SIL identified for release. Areas that are released from SIL should seek to co-locate housing with industrial uses, or a wider range of commercial uses*".
83. Furthermore, the draft OKR AAP sets targets of 20,000 new homes and 10,000 new jobs, to be supported by new infrastructure, including parks and schools. The Southwark Plan 2022 has confirmed the release of a substantial part of the Strategic and local Preferred Industrial Location designation in the Old Kent Road to allow for the creation of mixed use neighbourhoods where new and existing businesses would co-exist with new homes.
84. Paragraph 141(a) of the NPPF promotes making effective use of underutilised land, especially where this would help meet an identified need for housing. This has been incorporated into adopted policy as set out in Policy GG2 of the London Plan which seeks to prioritise the development of Opportunity Areas and sites which are well-connected by existing or planned Tube and rail stations and small sites. The

application site is located within the Old Kent Road Opportunity Area. In locations such as this, both London Plan and Southwark Plan policies strive for higher density, high quality mixed use developments which assist in addressing the need for new homes and ranges of employment opportunities.

85. In the draft OKR AAP, the site is identified as falling within Sub Area 4 and Proposal Site OKR16. The AAP reiterates the purpose for LSIS sites to incorporate new homes typologies into developments to co-exist along with industrial uses on site. This is illustrated in the typologies map on the following page of this report.
86. The existing use on site is not considered to maximise the potential of this Opportunity Area Proposal Site. The proposed re-development of the site would introduce an exemplary mixed use building comprising of light industrial, office and studio spaces (Use Class E) on the ground and mezzanine floor levels, and C3 residential Use Class and Sui Generis Use Class to the upper floors. The light industrial space would have excellent off street servicing facilities and a requirement to secure its internal fit out should secure its long term future use. It is anticipated that the scheme would deliver major regeneration benefits that are further discussed in the proceeding parts of this report.

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

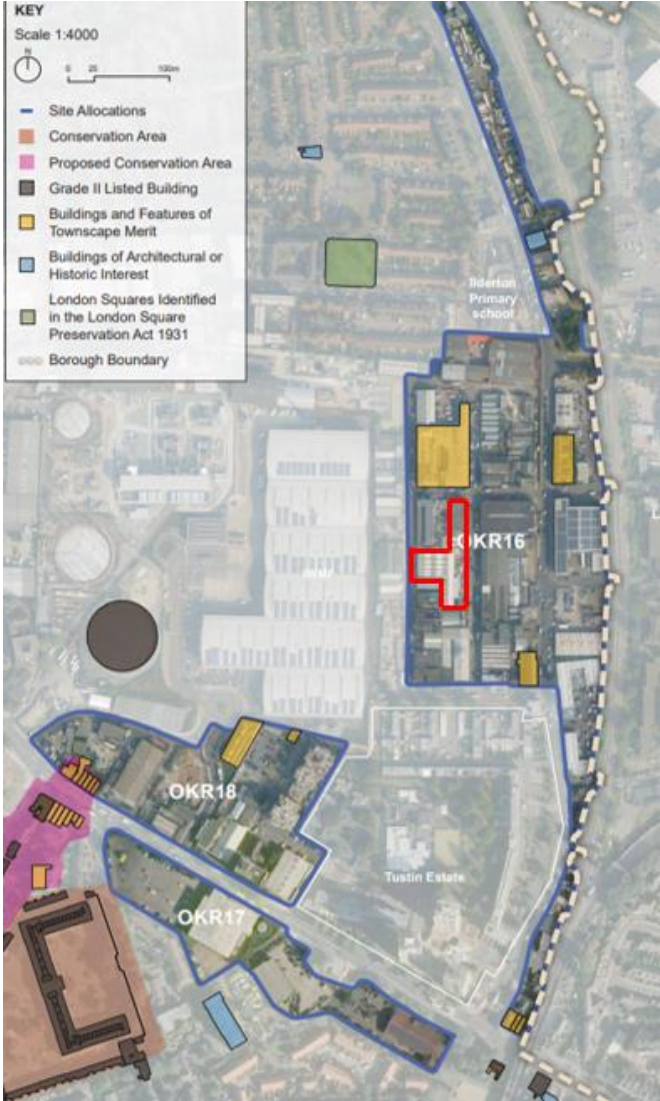


Image: Typologies map of OKR16 – Subject site outlined in red



Employment and affordable workspace

Employment Re-provision

87. A combination of double height spaces and mezzanines are used to maximise the total quantum of space provided whilst also providing maximum flexibility for a variety of functions. A minimum 4.5m floor to ceiling height is maintained through the ground floor to allow industrial uses throughout. With James Glancy Design being reincorporated on an improved floorplate, the proposed commercial floor space design will enable further office and studio uses onto the increased employment floor space.

The Council's Local Economy Team (LET) have reviewed the scheme and support the proposal. Triggers for employment obligations have been recommended by LET and will be secured in the S106 Agreement.

Image: Ground floor layout

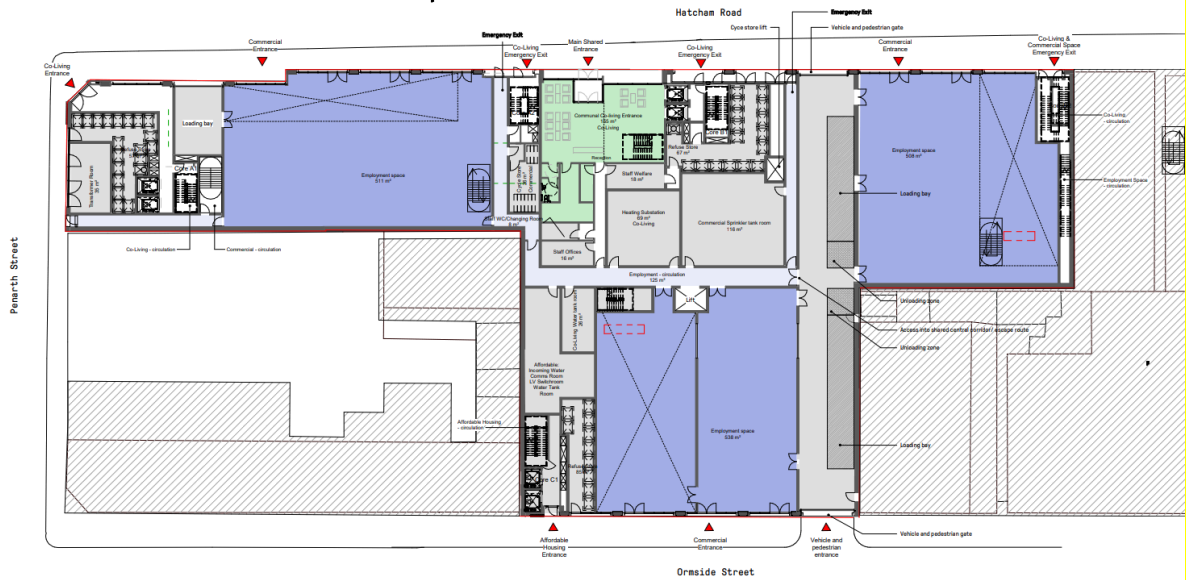
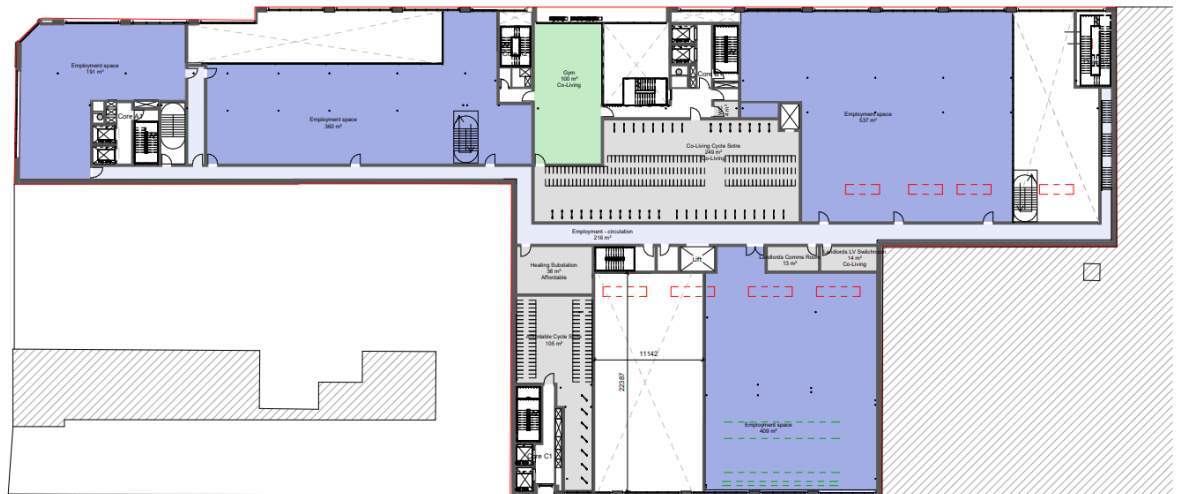


Image: Mezzanine level layout



Affordable workspace

- Policy P31 of the Southwark Plan requires developments proposing 500 sqm GIA or more employment floor space to provide 10% of the proposed gross employment floor space as affordable workspace on site at discount market rents. In acknowledging that James Glancy Design Ltd will be retained as part of the redevelopment of the commercial space, the scheme has increased the commercial floors space to enable

the development to additionally accommodate 419.5 sqm of affordable workspace. This will be secured in the S106 Agreement.

Provision of Housing, Including Affordable Housing

89. The development would provide 47 No. affordable units that equates to a total of 36.7% affordable housing by habitable rooms. The provision of affordable housing proposed within the scheme is a significantly positive aspect of the scheme.

Old Kent Road Phasing

90. The Greater London Authority (GLA) and Transport for London (TfL) officers have worked closely with Southwark Council officers to agree the broad geography and phasing of development in the area covered by the OKR AAP, to help provide certainty to communities, local businesses and developers in advance of the Bakerloo Line Extension (BLE) and a clear timetable for its delivery. This has resulted in broad agreement between the GLA, TfL and Southwark Council on the scale and geography of the area's new town centres, where industrial uses will be retained, replaced and intensified, and how housing delivery will be phased in advance of the BLE (for which formal safeguarding is now in place).
91. As part of this process, a cap of 9,500 net additional homes has been agreed for Phase 1 until a BLE construction contract is in place. This scheme forms one of the Phase 1 sites.

Conclusion on Land Use

92. The scheme would deliver major regeneration benefits, in an exemplary mixed use development including a significant contribution to the borough's housing stock, 36.7% affordable housing, an increase on existing employment floor space, and a significant improvement to the existing commercial space through a more efficient and useable floor plate. It is therefore considered that the development, in land use terms, is acceptable, and its contribution to the surrounding Old Kent Road Opportunity Area (OKROA) should be supported.

AFFORDABLE HOUSING AND DEVELOPMENT VIABILITY

Affordable Housing

93. National, regional and local planning policies place a high priority on the delivery of affordable housing as part of the plan led approach to addressing the housing crisis.
94. The regional policies relating to affordable housing are set out in the London Plan 2021, with the three key policies being H4, H5 and H6. These should be applied having regard to the Mayor's 'Housing' and 'Affordable Housing and Viability' SPGs. Policy

H4 requires development to deliver the maximum reasonable amount of affordable housing, with the Mayor setting a strategic target of 50%.

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

Table: Affordable housing units mix

Tenure	1 bed 2p	2 beds 4p	3 beds 4p/5p/6p	TOTAL
Social rented homes	6	15	12	33
Intermediate Homes	4	6	4	14
TOTAL	10	21	16	47

96. In total, 446 habitable rooms are proposed for the scheme. 163 habitable rooms are proposed as affordable. The breakdown of this amounts to 26.28% of the development providing 117 habitable rooms for social rented units, and 10.27% of the scheme amounting to 46 habitable rooms in the intermediate tenure. This equates to an overall affordable housing offer of 36.7% which meets the requirement for 35% of homes to be affordable social rented complying with Policy P1.

Development Viability

97. 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 36.55% is proposed and therefore a Financial Viability Assessment is required.
98. The Council’s consultant has reviewed the Financial Viability Assessment prepared on behalf of the applicant and concluded that the proposed scheme generates a residual land value (RLV) of £17,640,000 (build cost £55,352,768) and when benchmarked against a site value of £6,000,000 the scheme would generate a surplus of circa £11,640,000. The applicant’s appraisal concluded that there was a negative RLV of -£540,000 (build cost £60,400,634) against a benchmark site value of £8,950,000 the scheme would result in a loss of -£9,130,000 and therefore unable to support any affordable housing. The applicant has however, being mindful of the development plan requirement to deliver affordable housing has made provision for

47 no. affordable dwellings. The Council's independent FVA consultant has indicated that it is possible to provide affordable housing on the site.

Conclusion on Affordable Housing

99. The delivery of social rent and intermediate units for the conventional residential aspect of the scheme is a very positive aspect of the proposals. A 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.

DESIGN CONSIDERATIONS

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

Site Layout

101. 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. This is 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.*
102. The proposed layout utilises its T-shaped boundaries with industrial uses occupying the bulk of the deep plan at the base of the proposed building, straddling the street

frontages on both sides of the block and offering multiple access points with a principal internal loading bay serving all of these spaces facing onto Ormside Street. Located at the centre of the footprint of the building is the principle entrance, lobby spaces and amenity services. The industrial floorplate consists of a mix of a double height floorplate to the Ormside Street frontage and a light industrial at ground floor, and office space at mezzanine level to the Hatcham Road frontage.

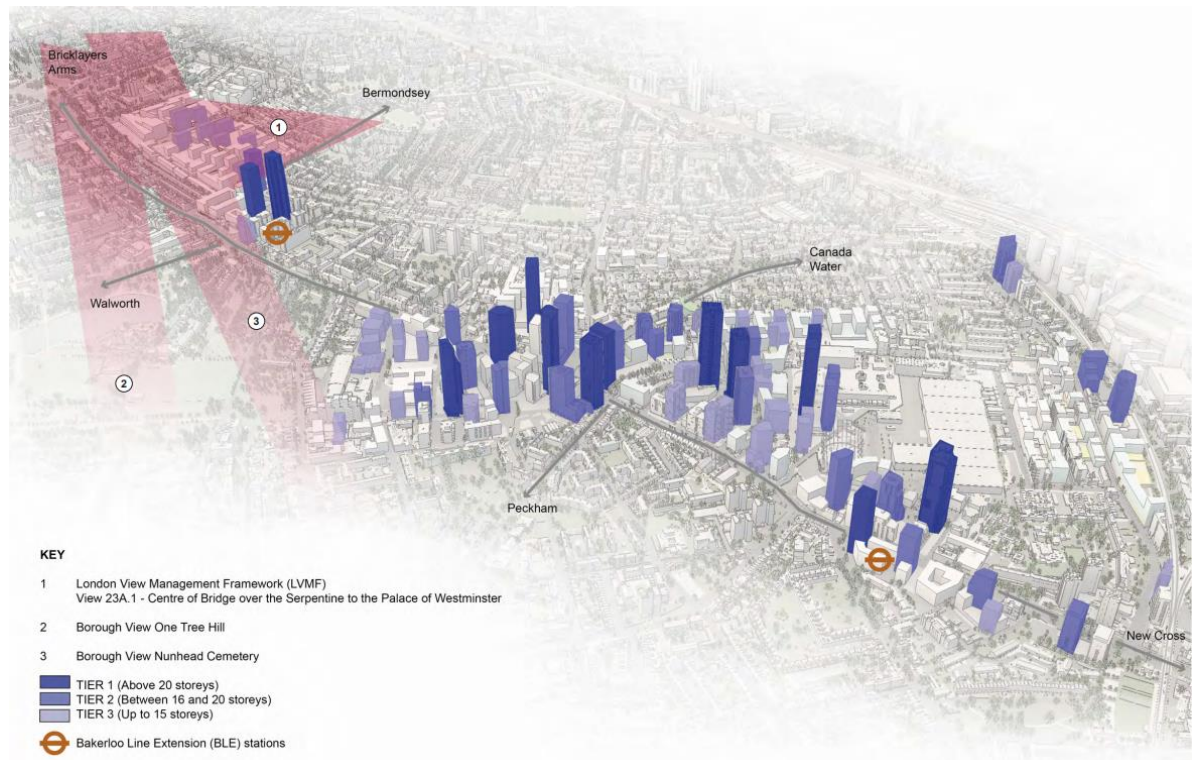
103. Above the industrial uses the development comprises of 3 No. urban blocks located adjacent to a centralised podium space. Block A will occupy the north-eastern part of the Site and will front onto Penarth Street and Hatcham Road. Block A will include 8 No. floors of co-living accommodation, comprising a total of 164 No. one-person studios. Block B will occupy the south-eastern part of the site and will front onto Hatcham Road. Block B will include 6 No. floors of co-living accommodation, comprising 117 No. one-person studios. Block C is located to the western part of the site and will front onto Ormside Street. Block C includes 7 No. floors of affordable residential accommodation, comprising 47 No. residential flats.
104. In line with the aspirations of the OKR AAP the proposed development includes a private service through road between Ormside Street and Hatcham Road to accommodate all servicing activity within the Site. The proposed through road is 6 metres wide and includes two loading bays off the route itself to accommodate the largest vehicles. It is connected to each workspace by internal service routes. The through road will be one-way only to reflect the Council's strategy for vehicle movements across the wider estate. The through road will be complemented by a single van-sized loading bay located in the north-western corner of the development, which will supplement this and also serve the adjacent single commercial unit. This design will also ensure that noise from servicing operations is contained and not adversely affect the residential uses on the upper floors.

Height, Scale and Massing (including consideration of Tall Buildings)

105. London Plan Policy D9 provides policy requirements for tall buildings. The policy sets out a list of criteria against which to assess the impact of a proposed tall building (location/visual/functional/environment/cumulative). London Plan Policy D4 requires that all proposals exceeding 30 metres in height and 350 units per hectare must have undergone at least one design review or demonstrate that they have undergone a local borough process of design scrutiny.
106. 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.
107. The site allocation for this site NSP 70 states that comprehensive mixed use development of this site could include taller buildings to the east of Ilderton Road. The draft OKRD AAP identifies that within Hatcham and to the west of Ilderton Road, the majority of buildings will be at 5 to 6 storeys with additional height on the corners of perimeter blocks on Manor Grove Penarth Street and Record Street. Policy 8 of the Draft OKR AAP sets out a tall building strategy with the 'Stations and Crossings' reinforcing the proposed hierarchy of buildings.
108. The sites to the west of Ilderton Road are not identified as containing tier 1, 2 or 3 buildings and consequently the proposed development has a maximum height of 10 No. storeys. OKR AAP Policy 8 states that buildings which fall outside of this structure will generally be expected to be of a lower/mid-scale from 3 No. to 11 No. storeys depending on context. The policy further states that the lower/mid-scale should typically form the shoulder height of podiums and/ or perimeter blocks defining streets within the masterplan. As noted the building heights guidance for the subject site within OKR 16 states that schemes within Hatcham Road should be between 5 No. to 6 No. storeys, with some additional height on the corners of the perimeter blocks on Manor Grove, Penarth Street and Record Street and this is the approach the applicant has broadly followed.

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



109. The mixed-use proposal is T-shaped and located between existing buildings and uses to the north and south of the site. Due to the constrained nature, the development has a principal eastern elevation along Hatcham Road with a secondary western elevation on Ormside Street. The development comprises of three urban blocks, referred to as Block A, Block B, and Block C. Block A is located at the north-eastern part of the site with frontages onto Penarth Street and Hatcham Road at a maximum 10 No. storeys in height. Block B is located along the south-eastern part of the site with a full frontage along Hatcham Road at a height of 8 No. storeys. Block C is located on the western portion of the site fronting onto Ormside Street at a height of 9 No. storeys.

110. The building heights are varied within the development to alleviate the massing of the scheme with the taller 10 storey element located at the corner of Penarth Street and Hatcham Road as required by the AAP. There is a break in the blocks A and B fronting Penarth Street that break-up the overall form and massing and allows for good levels of daylight and sunlight enter the centralised podium space. The variation in building heights is considered to follow the principles set out in the OKRD AAP albeit at a greater height (8 storeys as opposed to 6) along Penarth Street. The ground floor frontage of Hatcham Road is set back from the building line to provide a more generous entry space to the Co-Living unit entrances for Blocks A and B. Block C is designed to function as a standalone building within the development with its own entrance from Ormside Street. The building has blank flank walls to enable the completion of the redevelopment of adjacent sites in a perimeter block form as proposed in the OKRD AAP. The west facing residential units on the upper floors will have inset balconies to avoid any overhanging balconies extending beyond the building line of Ormside Street.

111. Whilst the development would be seen as three separate blocks, they are to be linked by a commercial base that covers the majority of the site, and as neighbouring sites come forward in the future they will in time form part of a planned and comprehensive perimeter block redevelopment as set out in the OKRD AAP. A combination of double height spaces and ground floor plus mezzanine levels are used to maximise the total quantum of space provided whilst also providing maximum flexibility for a variety of functions. A minimum 4.5m floor to ceiling height is maintained through the ground floor to allow industrial uses throughout. The commercial space across these two levels have been split into three inter-connected large spaces that can then be subdivided into various work processes and uses.
112. Whilst the massing and height of the proposal contrasts with recommended AAP heights contained within the OKR 16 building heights guidance, the proposals are not considered to conflict with the general pattern of development already being built out within the immediate vicinity. The scale and massing of the proposed development has been informed by the Council's massing model contained in the emerging Old Kent Road Area Action Plan. This provided the parameters which informed the design development process.
113. The maximum height being positioned to the north-eastern corner of the block would sit at a similar height to the recently completed development at 180 Ilderton Road adjacent to the subject site, and would have a good fit with its local townscape context. For the reasons set out above, the proposal would complement the immediate area and help to deliver the wider development ambitions for OKR 16.

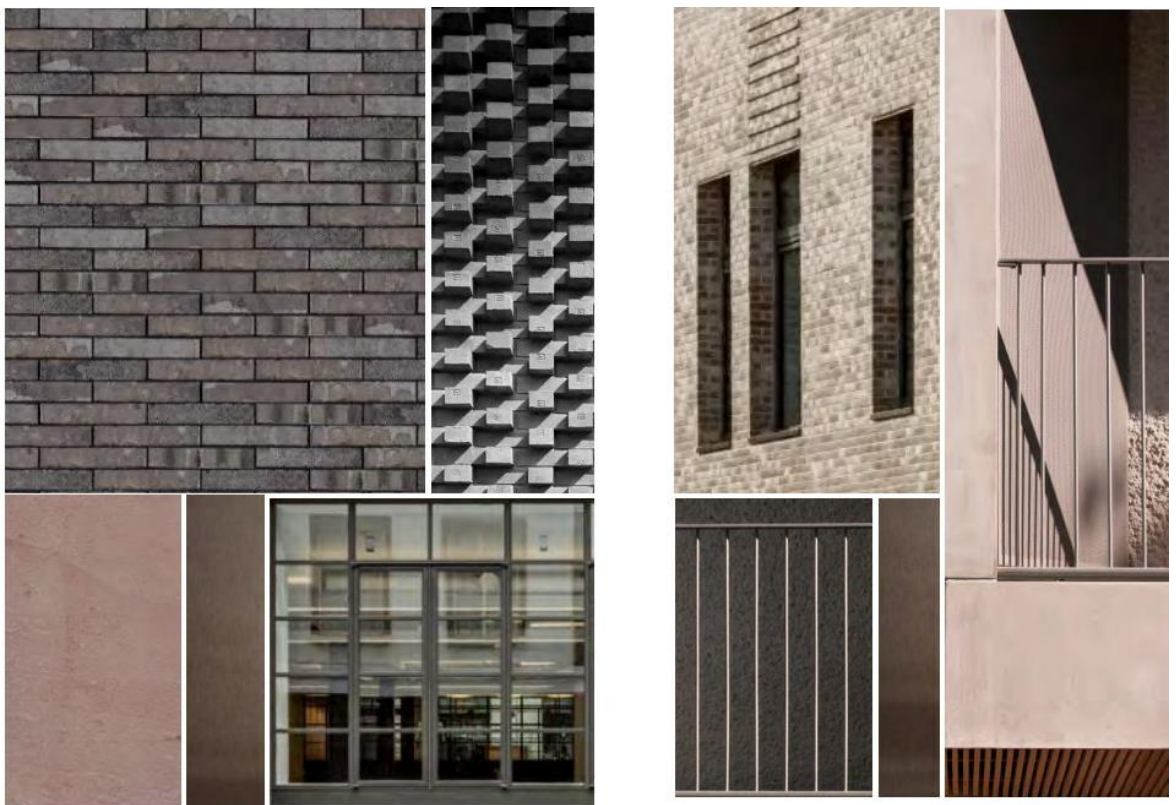
Architectural Design and Materiality

114. 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.
115. The material palette chosen for the Co-Living blocks consists of a mix of dark grey bricks, projecting bricks, with pigmented concrete, bronze coloured aluminium and industrial glazing to the commercial spaces at ground and mezzanine level. There is a slight difference to the palette proposed for the affordable housing block. The affordable block would also be constructed using pigmented concrete, bronze coloured aluminium and projecting bricks. The main brick finish to the facades would consist of light buff brick.
116. The materials have been proposed to reference the industrial character of the surrounding area. The dark coloured brick is accompanied by regular gridded elevation arrangements consistent with the industrial history of the area with expressed steelwork frames around ground floor workspace glazed openings. Relief to the

elevations is provided by textured projecting brickwork patterning and pigmented reconstituted stone elements used to frame the recessed balconies in the affordable block and as horizontal intermittent bands in the co-living blocks.

117. The high quality architecture is considered to enhance the existing appearance of the subject site whilst referencing the surrounding context. Submitted details ensure that there would be depth and articulation to facades of the development. This level of detail will be secured through the inclusion of conditions in order to ensure that this level of design quality is maintained in the construction of the proposal. These conditions have been attached to the decision notice.

Image: Materiality palette

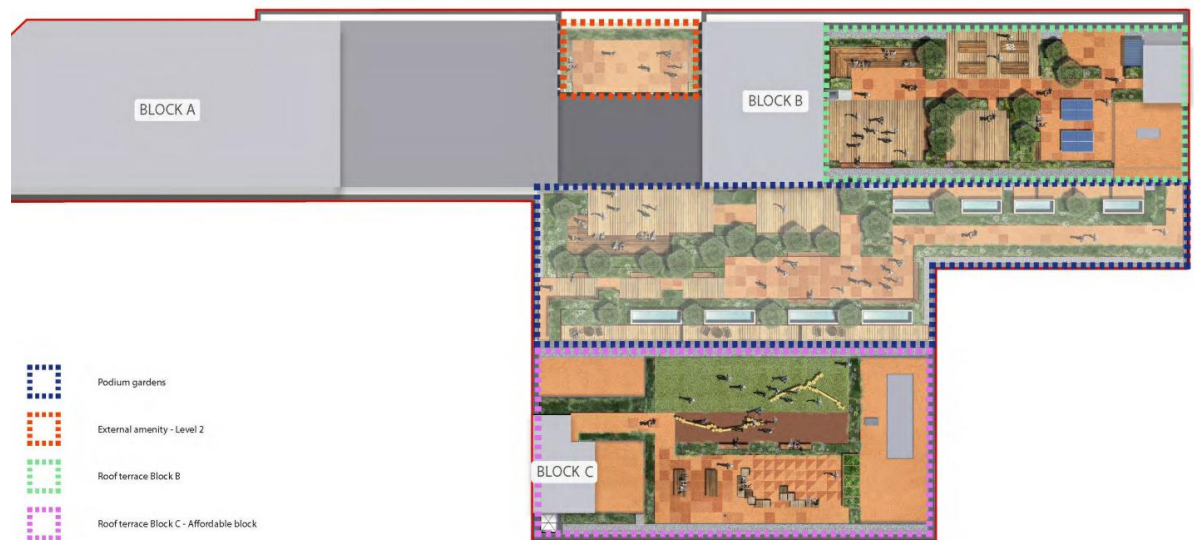


Landscaping

118. Policy P59 of the Southwark Plan (Green infrastructure) states that major developments that are to be referred to the Mayor of London must provide new publically accessible open space and green links. Additionally, developments should provide multiple benefits for the health of people and wildlife, and to integrate with the wider green infrastructure network and townscape / landscape, increasing access for people and habitat connectivity. Point 3 of London Plan Policy G1 (Green Infrastructure) requires Development Plans and Opportunity Area Planning Frameworks should identify key green infrastructure assets, their function and their potential function. They should also identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.

119. An indicative landscaping strategy is proposed for the site which outlines a high-quality approach towards hard and soft landscaping throughout. Extensive and appropriate planting and landscaping in the communal amenity areas has been incorporated into the design to enhance the well-being and communal options for residents within the development. The communal spaces are divided into a series of spaces at podium level, a pock area on level two between blocks A and B, and roof terraces to both block B and C.

Image: Birds eye view of landscape areas



120. Overall, the landscape proposals are considered to be a significantly positive aspect of the redevelopment of the subject site. All plans are indicative with detailed landscape plans involving hard and soft features being subject to conditions which are attached to the decision notice. The hard and soft landscaping condition will require appropriate buffering to units fronting onto the communal amenity spaces proposed within the development.

121. It is noted that the private amenity spaces of the residential units on the podium level will require appropriate screening details to secure privacy from the communal space located on the same level. This requirement has been added into the wording of the hard and soft landscaping with details needing to be agreed by the LPA to safeguard the amenity of the potentially affected residents.

122. The security of future residents has also been considered, with lighting arranged around the external amenity areas. The lighting is of a low level and has been strategically placed so that there are no hidden corners within the amenity spaces. A lighting strategy is secured by condition and attached to the decision notice.

Ecology

123. A Preliminary Ecological Appraisal (PEA) prepared by Middlemarch Environmental dated August 2021. The PEA has identified habitats that are present on site are of negligible ecological value and require no specific mitigation for their removal. The nearest designated site is the Senegal Railway Banks SINC, which is approximately 140m to the east of the subject site, and given the distance, the development is unlikely to impact on the conservation of the SINC. The PEA also identifies that the site would provide biodiversity net gain.
124. The Council's Ecologist has reviewed the submitted documentation and raises no objection. The Ecologists recommend that upon review of the PEA and Bat Assessment that swift nesting bricks are advised with 24 No. swift bricks be inserted along the eastern elevation of the development. Further recommendations include a precautionary bat survey, the inclusion of 4 No. bat bricks/tubes on the eastern elevation, and a lighting plan in compliance with the Habitats Regulations and the Wildlife & Countryside Act 1981. Recommended conditions have been attached to this decision to ensure compliance.

Urban Greening Factor

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

Image: Urban Greening Factor score

Urban Greening Factor Calculator				
Surface Cover Type	Factor	Area (m ²)	Contribution	Notes
Semi-natural vegetation (e.g. trees, woodland, species-rich grassland) maintained or established on site.	1		0	
Wetland or open water (semi-natural; not chlorinated) maintained or established on	1		0	
Intensive green roof or vegetation over structure. Substrate minimum settled depth of 150mm.	0.8	402	321.6	
Standard trees planted in connected tree pits with a minimum soil volume equivalent to at least two thirds of the projected canopy area of the mature tree.	0.8		0	
Extensive green roof with substrate of minimum settled depth of 80mm (or 60mm beneath vegetation blanket) – meets the requirements of GRO Code 2014.	0.7		0	
Flower-rich perennial planting.	0.7		0	
Rain gardens and other vegetated sustainable drainage elements.	0.7		0	
Hedges (line of mature shrubs one or two shrubs wide).	0.6		0	
Standard trees planted in pits with soil volumes less than two thirds of the projected canopy area of the mature tree.	0.6	114	68.4	
Green wall –modular system or climbers rooted in soil.	0.6		0	
Groundcover planting.	0.5		0	
Amenity grassland (species-poor, regularly mown lawn).	0.4		0	
Extensive green roof of sedum mat or other lightweight systems that do not meet GRO Code 2014.	0.3		0	
Water features (chlorinated) or unplanted detention basins.	0.2		0	
Permeable paving.	0.1	1328	132.8	
Sealed surfaces (e.g. concrete, asphalt, waterproofing, stone).	0		0	
Total contribution			522.8	
Total site area (m²)			3421	
Urban Greening Factor			0.152820813	

126. The existing site encompasses the entire floorplate of the subject site leading to an almost non-existent Urban Greening Factor (UGF) score. The UGF score from the inclusion of trees and soft landscaping is 0.1528. Officers acknowledge that the UGF cannot be increased any further due to the physical constraints of the site and the optimising of development on a brownfield site. As set out in the OKR AAP this site is expected to be developed at full site coverage with the re-provision of a significant commercial space. Whilst the shortfall is acknowledged, it is considered that the design has adequately addressed the delivery of the AAP masterplan and balanced the amount of soft landscape with the requirements for flexible and functional amenity space for residents. In addition, there will be a s278 agreement to provide build outs of the footway thereby providing public realm and more opportunities to provide street greening.

Trees

127. London Plan Policies (G1 & G7) and Southwark Plan Policy P61 require that wherever possible, existing trees of value are retained.

128. An Arboricultural Method Statement (AIA) has been submitted and reviewed by the council's Urban Forester. The AIA states that there are 16 No. street trees in the vicinity of the subject site. As part of the comprehensive redevelopment of the site, 4 No. of these trees are in close proximity to the boundaries of the development site. The location of the trees do not require any of their removal with the AIA recommending that the trees are lightly pruned of around 1m on the building side of the canopy. The stems of each of the 4 No. trees during the pruning process will be protected from inadvertent damage by boxing the stems with scaffold boards or similar prior to work starting including demolition.

129. The proposed podium and terrace landscaping is based on a rigid geometric pattern that relies on high quality planting specifications to prevent it becoming overly austere. Suitably large planter volumes and intensive maintenance details need to be confirmed as part of the hard and soft landscaping details that are attached to the decision notice to ensure compliance.

HERITAGE AND TOWNSCAPE CONSIDERATIONS

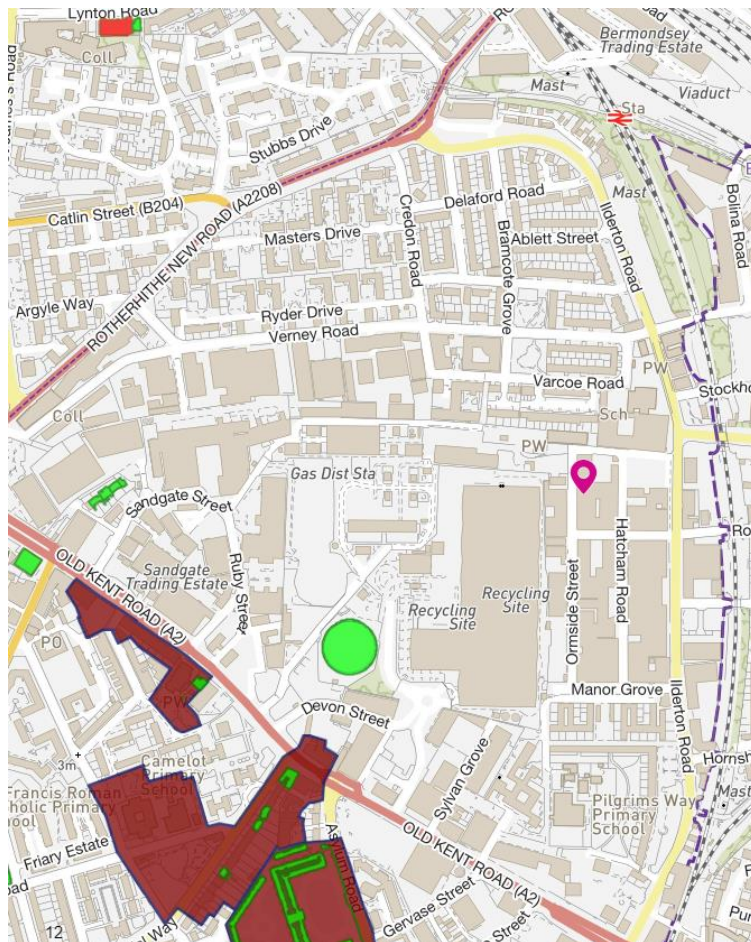
130. Policy HC1 of the London Plan 2021 advises that development affecting heritage assets and their settings should conserve their significance by being sympathetic in their form, scale, materials and architectural detail. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires local planning authorities to consider the impacts of proposals upon a conservation area and its setting and to pay "special regard to the desirability of preserving or enhancing the character or appearance of that area". Section 66 of the Act also requires the Authority to consider the impacts of a development on a listed building or its setting and to have "special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses". Para 199 of the NPPF

2021 states that ‘great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.’

Conservation Areas

131. The subject site is not located within the boundaries of a conservation area, nor is it identified as a listed building. The closest conservation area is Kentish Drovers and Bird in Bush, located approximately 445 metres southwest of the subject site. Designated heritage assets within 500 metres of the site is limited to Grade II listed Gasholder no. 13 which is located circa 315 metres southwest of the subject site.

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



Draft OKR APP and Draft Local List

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

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

Property	Description
Penarth Centre, 30 Penarth Street	Building of Townscape Merit
Christ the King Chapel, 8 Manor Grove	Building of Townscape Merit

Townscape and Visual Impact Assessment (TVIA)

133. A Townscape and Visual Impact Assessment (TVIA) has been submitted as part of this application. The study area for the TVIA is taken within a 500 metres radius from the site and has been informed through discussions with planning officers. The effects on settings of heritage assets or ecological/ environmental assets will not be assessed within this TVIA, although effects on built landmarks are considered if they contribute to townscape character. Effects on Conservation Areas and Listed Buildings are considered in terms of impact on present day users and residents in addition to townscape effects.
134. The scale of the townscape and visual effects is determined by considering both the sensitivity of the townscape feature, townscape character or view with the magnitude of change. The scale of effects is described as neutral, very low, low, medium, or high. The following table provides a breakdown of how the effects are assessed and rated.
135. There are five viewpoints within a 500 metres radius conducted as part of the TVIA assessment. The table below provides detail on the distance of the viewpoint to the development site, potential receptors, the value of the view, the susceptibility of the view, and the sensitivity of the viewpoint.

Table: Viewpoint assessment

<u>Viewpoint and Location</u>	<u>Distance to site boundary</u>	<u>Receptors</u>	<u>Value (Of view)</u>	<u>Susceptibility to change</u>	<u>Sensitivity</u>
1. Bridgehouse Meadows	0.45km	-Recreational users of Public Open Space -Cyclists -Pedestrians	Medium	Low/Medium	Low

2. Hatcham Road junction with Manor Grove	100m	-Pedestrians -Road users	Low	Medium beneficial	Low
3. Ormside Street junction with Manor Grove	105m	-Pedestrian -Road users	Low	Medium beneficial	Low
4. Hatcham Road looking south	75m	-Pedestrians -Road users	Low	Medium beneficial	Low
5. Devon Street looking east	0.35km	-Road users -Pedestrians -Cyclists	Low	Neutral	Low

136. The assessment of all 5 No. viewpoints indicates that, while the proposed development will introduce change to the subject site and its locality, such change can be accommodated without unacceptable effects on townscape character and visual amenity. While the massing and height of the building contrasts with the mainly low-rise buildings of the surrounding area, it does not conflict with the prevailing pattern of other existing or proposed developments within the wider context of OKR16 and the OKROA.

London View Management Framework

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

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

Strategic Borough Views - Southwark

139. The site is not in any Borough views.

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



Conclusion on the Setting of Listed Buildings, Conservation Areas and Townscape

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

Table: Impact on heritage significance

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

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

141. In conclusion, the proposed development would not have a significant impact on the views assessed despite it being a highly visible feature in the immediate townscape. Given the substantial distance to the nearest designated heritage assets, and taking into consideration the height of the development, the scheme is considered to be a beneficial addition to the London Skyline that would successfully integrate into the immediate area and would not cause harm to any of the designated heritage assets listed above. There are undesignated heritage assets in closer proximity to scheme and including the chapel on Manor Grove and the Penarth Centre. Given the scale of the proposals they would not have a harmful impact on the chapel, as they would only be partially visible within the chapels setting. In terms of the Penarth Centre its character is industrial and the new buildings design and use would complement its setting and cause no harm to it.
142. Whilst limited weight has been given to emerging policy, full weight has been given to adopted policies, including the NPPF (2021), London Plan (2021) and Southwark Plan (2022). As can be seen from the assessment contained within this report, the development is considered to be in compliance with these adopted policies.

HOUSING MIX, DENSITY AND RESIDENTIAL QUALITY

Housing Mix

143. Policy H16 of the London Plan 2021 does not directly reference minimum floor standards for co-living units, and in terms of their size and function, no specific housing mix standards apply to co-living or any other purpose-built shared living housing product. However, the Mayor has recently published a draft version of the London Plan Guidance for Large-scale Purpose-built Shared Living. Public engagement on the guidance closed on March 27th 2022.
144. Section 4.10 of the draft document provides details on minimum and maximum standards for purpose-built shared living developments. The units should not be less than 18 sqm and not more than 27 sqm to avoid being converted to sub-standard self-contained units. Accessible units are expected to be generally between 28 and 37 sqm to accommodate ease of access to the amenities.
145. Of the 283 No. co-living units proposed, 32 No. units will be wheelchair accessible at 29 sqm, and the remaining 149 No. consist standard co-living studios at 20 sqm per unit.

Table: Co-Living mix

<u>Block A</u>	<u>Standard Studio – 20sqm</u>	<u>Accessible Studio – 29sqm</u>
Level 01	19	4
Level 02	19	4
Level 03	19	4
Level 04	19	4
Level 05	19	4
Level 06	19	4
Level 07	8	4
Level 08	10	4
Totals	132	32
<u>Block B</u>		
Level 01	25	-
Level 02	21	-
Level 03	21	-
Level 04	21	-
Level 05	21	-
Level 06	8	-
Totals	117	-

146. For the conventional residential element of this scheme, Southwark Plan Policy P2 seeks to ensure that a minimum of 20% of family homes with three or more bedrooms are provided in the Action Area Cores (which would apply to this Old Kent Road site) and a minimum of 25% of homes with three or more bedrooms are provided in the urban zone. The policy also requires two bedroom homes as a mix of two bedroom 3 person and two bedroom 4 person homes. The housing mix requirements are replicated in the draft OKR AAP (Policy 4).

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

Table – Housing Mix:

<u>Dwelling size</u>	<u>No. of units</u>	<u>Percentage</u>
1 Bedroom	10	21.28%
2 Bedrooms	21	44.68%
3 Bedrooms	16	34.04%
Total	47	100%

148. The table above demonstrates that the development would provide 78.72% of the new units as two or more bedrooms. In addition, 34% of units would be family homes with three bedrooms. This provision substantially exceeds the minimum requirement of 20% of homes being three beds or more as per OKR AAP Policy 4, and the requirement of 25% for three beds in urban zones as per the intention of Southwark Plan Policy P2. This is a significantly positive aspect of the scheme.

Wheelchair Housing

149. Policy P8 of the Southwark Plan requires at least 10% of the dwellings, by habitable rooms, across the subject site to meet Building Regulation M4(3) 'wheelchair user dwellings' (with 10% of the social rented homes meeting Building Regulation M4(3)(2)(b) 'wheelchair accessible dwellings' as thus available for immediate occupation). All other dwellings will be delivered to meet M4(2) 'accessible and adaptable dwellings' standards.
150. The co-living aspect of the accommodation includes 32 wheelchair accessible studios comprising individual floor areas of 29 sqm each. This amounts to 11.31% of the overall co-living provision within the development. For the conventional housing wheelchair provision, 7 No. of the 47 No. units are proposed as wheelchair accessible, and this equals 15% of the conventional housing provision within the scheme. The wheelchair user dwellings would be secured through the Section 106 Legal Agreement.

Density

151. The Southwark Plan does not contain specific density matrices and ranges for different areas of the borough. Instead, it sets out a range of criteria relating to good design and appropriate density in the context of a site-specific approach, including in policies P13

Design of places, P14 Design quality, P15 Residential design and P18 Efficient use of land. Criteria across these policies require among other things that:

152.
 - 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
153. This approach is consistent with the London Plan, within which policy D3 refers to optimising site capacity through a design led approach. The quality of the proposed units, the acceptability of the height and massing, the architecture, the townscape impacts, the neighbour amenity impacts and transport implications are set out in detail in the relevant sections of this report.

Quality of Residential Accommodation

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

Unit Size

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

Table: Proposed flat sizes for conventional residential units

Unit Type	SPD Requirement (sqm)	Size range proposed (sqm)
1 Bed 2 Person (flat)	50 sqm	50 – 51 sqm
2 Bed 4 Person (flat)	70 sqm	70 – 71 sqm
3 Bed 4 Person (flat)	74 sqm	83 sqm
3 Bed 5 Person (flat)	86 sqm	91-93 sqm
3 Bed 5 Person (WCH)	94 sqm	95 sqm
3 Bed 6 Person	95 sqm	102 sqm

157. The above table demonstrates that the development has successfully designed the layout of each floor to accommodate each bedroom type without compromising the quality of accommodation. Layouts of the flats are well proportioned with no hidden corners with an emphasis of ease of movement and circulation within each flat. Furthermore, each apartment prioritises placing the open plan living / kitchen / dining room to the front facade of the building to maximise potential for natural daylighting and views. Overall, it is therefore considered that the size and layouts of the units are acceptable, and would provide a good quality of accommodation.
158. The sizes of the standard studio and accessible studio co-living units meet the minimum standards required for each unit type. Whilst it is noted that these units do not benefit from private amenity, communal spaces are provided in both Block A and Block B for the occupiers of the co-living units to use at their perusal.
159. There is some degree of concern regarding the overall quality of accommodation for the co-living units located on the western elevation of Block A from floors 1 No. to 9 No., which is expanded on further in the Noise and Agent of Change sections of this report.

Internal Daylight and Sunlight

160. An internal daylight and sunlight assessment has been submitted with the results tested against the BS EN 17037:2018 'Daylight in buildings' document. This methodology offers guidance in assessing the daylight and sunlight to new dwellings. The results of the internal daylight and sunlight assessment for dwellings and co-living units within the scheme are discussed below.
161. Regarding daylight the UK National Annex to BS EN 17037 provides minimum illuminance recommendations for daylight provision within UK dwellings, which is based on the median illuminance that should be achieved over at least 50% of the assessment grid for at least 50% of the daylight hours over the course of a calendar year. The target values and rooms are:

Table: Daylighting targets for National Annex of BS EN 17037

<u>Room Type</u>	<u>Target Illuminance over at least 50% of a reference plane 0.85m from the floor, for at least half of the daylight hours (lx)</u>
Bedrooms	100 Lux
Living Rooms	150 Lux
Kitchens	250 Lux

162. The calculation undertaken to demonstrate the daylight availability to the proposed habitable rooms within this development applied the following values:
- Diffuse glass transmission: 0.68 for clear double glazing with low emissivity coating;
 - Maintenance factor for dirt on glass: 0.92 (e.g. 8% loss) for vertical glazing
163. Using the methods listed in the bullet points and table above, the results found that in the Co-Living units 3 No. (75%) out of 4 No. rooms tested would achieve or exceed the recommended guideline values. For the conventional residential housing in Block C, the guidance establishes that the three lowest residential floors within the building which are the lowest performing floors in the building; 63 No. rooms tested within Block C are all located from first to third-floor levels. Results from tests undertaken on flats on the first to third floors within Block C show that 55 No. (87%) of the 63 No. rooms tested would achieve or exceed the recommended guidelines values. The remaining 8 No. rooms comprise 6 No. bedrooms and 2 No. living rooms on the first floor level. The fourth to seventh floors all benefit from higher daylighting levels and are in accordance with the guideline values. The results demonstrate that high levels of daylight are achieved in compliance with the BRE guidelines.
164. In terms of sunlight to developments the BS EN 17037 provides minimum, medium and high recommended levels for sunlight exposure. This is measured via the duration received to a point on the inside of a window on a selected date between February 1st and March 21st. For this assessment the March 21st (equinox) has been used. This assessment assumes a cloudless sky and therefore represents the maximum possible amount of sunlight. The assessment is undertaken using the calculation of the sun's position based on the geometrical equations in the BS document.
165. Paragraphs 3.1.10 and 3.1.11 of the 2022 BRE guidelines highlight that *“for dwellings, at least one habitable room, preferably a main living room, should meet at least the minimum criterion.”* It further notes that *“the BS EN 17037 criterion applies to rooms of all orientations, although if a room faces significantly north of due east or west it is unlikely to be met”*.

166. The table below provides the recommended values for sunlight exposure in developments. The BS document requires that one habitable room in a dwelling should receive at least the recommended exposure to sunlight.

Table: Sunlighting targets in National Annex of BS EN 17037

<u>Level of Recommended Exposure</u>	<u>Sunlight Exposure</u>
Minimum	1.5 hours
Medium	3 hours
High	4 hours

167. The methodology above when applied to this development for the sunlight exposure results for the Co-Living units demonstrates that all 4 No. rooms tested would not achieve the minimum guidelines as the windows tested face 90 degrees due north. For the sunlight exposure results for the conventional housing proposed in Block C shows that 24 No. (38%) out of 63 No. rooms would meet or exceed the minimum guideline values. Of the 24 No. rooms, 6 No. (25%) would meet the Medium levels of the BRE guidelines above.

168. It is noted that that many of the rooms have been designed with direct access to private amenity spaces (e.g. balconies) which provide private amenity space for the occupants. The level of adherence to the guidelines for these rooms would otherwise be better if balconies were not present.

169. Given the assessment above, it is considered that on balance, the proposals would result in acceptable levels of daylight and sunlight into the dwellings within the development, and in some instances the scheme achieves a very high level of compliance with the BRE recommendations.

Overlooking and Privacy within the Proposed Development

Image: Podium level buffer zones to private terraces



- 01 Outdoor lounge to Co-Living unit
- 02 Quiet spaces with seating elements
- 03 Raised planters
- 04 Spill-out space
- 05 Communal flexible space
- 06 Private terraces

Image: Section through podium floor



170. The units most at risk of potential overlooking and loss of privacy within the development are the conventional residential units in Block C located at podium level, 2 X 2 bed 4 person intermediate units, and 1 X 3 bed 4 person intermediate unit.

Submitted plans demonstrate that privacy buffers will be created to mitigate against any potential overlooking or loss of privacy from within the development. In addition, the four co-living studios adjoin the communal spaces provided on the podium level. Details of the privacy buffers for all potentially affected units will be secured within the hard and soft landscaping condition attached to this decision notice.

171. In terms of separation distances between the co-living blocks and the conventional housing block, The GLA raised concerns about this distance with potential for overlooking possibilities leading to amenity impacts. In acknowledging the concerns of the GLA, the separation distances between the blocks is largely a function of the masterplan and AAP model, which have helped to inform the layout and configuration of the proposed development. The grid street pattern in this part of the Old Kent Road area means that the redevelopment of the plots requires a north-south alignment in most cases. This pattern of development also needs to take account of the presence of neighbouring industrial uses and ensuring that new development does not prejudice the future development potential of adjoining sites.
172. In addition to the above, the separation distance between the co-living blocks and the affordable housing block is 15 metres. Southwark's Residential Design Standards SPD requires developments to achieve a separation distance of 12 metres between the front of buildings and across public highways. The central open space on podium level has been designed to act in this was as a shared space. The proposed separation distance therefore exceeds the requirement set out in the Council's SPD. Notwithstanding the above, and to assist in alleviating the concern raised by the GLA, the applicant has agreed to a planning condition that is included in the decision notice which requires the submission of detailed drawings showing the inclusion of angled windows on the western façade of Block B where it faces the affordable block.

Number of Units Per Core

173. The 47 No. conventional residential units are provided on floors 1 to 7 of Block C. Floors 1 and 2 have 6 units per core, with floors 3 to 7 providing 7 cores per floor. The lift and stair core is located at the northern end of each floor with the residential units on each floor being accessed by a single corridor. Amendments received during the planning stage have incorporated 1 dual aspect unit per floor. Given that the development cannot provide windows in the southern and northern elevations of Block C as to not prejudice the development of adjoining sites in the future, the inclusion of 1 dual aspect per floor is considered acceptable in this instance. It is noted that the remaining 5 and 6 cores on each floor, provide single aspect east and west facing units.

Secured by Design

174. The Metropolitan Police Secure By Design Officer has held discussions with the applicant and is satisfied that the development can achieve Secure By Design Accreditation. Conditions recommended by the Secure By Design Officer have been attached to this decision.

Conclusion on Quality of Accommodation

175. The floor layouts and size of the conventional residential units proposed are a positive aspect of this development and enables the occupiers to move freely through each unit without contriving circulation and movement. As noted previously there is a degree of concern for occupiers of the co-living units on the western elevation of Block A; however, conditions have been proposed to overcome concerns raised. Overall, given the significant constraints of the site in close proximity to future development sites adjoining to the immediate north and south, it is therefore considered that the proposed development would provide a good quality of accommodation for future residents.

OUTDOOR AMENITY SPACE, PLAY SPACE AND PUBLIC OPEN SPACE

176. 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 Southwark Plan requires the provision of 5 sqm of public open space per dwelling.
177. Four categories of open space are required in major planning applications in the Old Kent Road Opportunity Area:
- Private amenity space: For units containing three or more bedrooms, 10 sqm of private amenity space as required by the SPD; and for units containing 2 bedrooms or less, ideally 10 sqm of private amenity space, with the balance added to the communal space;
 - Communal amenity space: 50 sqm communal amenity space per development as required by the SPD; and
 - Children's play space: 10 sqm of children's play space for every child space in the development as required by the London Plan.
 - Public open space: 5 sqm of public open space per dwelling as required by the draft OKR AAP. If it is not feasible to deliver the open space on site, a financial contribution will be required.

Private Outdoor Amenity Space

178. All of the proposed conventional homes have been provided with private amenity space in the form of either; overhanging private balconies, or inset private balconies, with the units on the podium floor having private defensible space. The majority of homes have been designed to have at least 5 sqm of private amenity space, with the shortfall from each private amenity area included in the communal amenity space of the development.

179. The total amount of private amenity space proposed within the development is 412 sqm. This results in a shortfall of 68 sqm of the required 470 sqm. This shortfall is required to be included in the provision of communal amenity space within the scheme.

Communal Amenity Space

180. In order to comply with the requirements of the Residential Design Standards SPD, 50 sqm communal amenity space per development should be provided. This should be provided in addition to the requirement to compensate for any shortfall in private amenity space.

181. As stated in the private amenity space consideration above, the shortfall of the private amenity has been included into the communal amenity requirement for this development. The scheme provides two communal amenity areas; one on the podium level with a generous provision of 642 sqm, and the other on the roof terrace of Block C that comprises of 121 sqm of communal amenity alongside 201 sqm of children’s play space. Both spaces are served by stair cores and available for use by all residents.

182. The following table summarises the communal amenity space requirements, against that proposed. All the podium and terrace communal amenity spaces would be accessible to all residents.

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

Communal amenity space proposed	Proposal	Shortfall
(Podium and roof terrace)	763 sqm Required 68 sqm +50 sqm = 118 sqm	No shortfall (645 sqm over provision)

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

Children’s Play space

184. 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).

185. The Mayor’s SPG sets out the intended strategic approach to delivering new and enhanced play space both on and off-site in new developments. It explains that ‘doorstep’ play (Under 5s) should usually be provided on-site, unless there is existing provision within 100 metres. For 5-11 year olds and children over 12 years old, it recommends that off-site provision is acceptable, if there is existing provision within

100-400 metres and 400-800 metres respectively. This is summarised in Table 4.5 of the SPG, reproduced below.

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

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

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

- 186. The financial contributions required in line with the Section 106 Planning Obligations and Community Infrastructure Levy (CIL) SPD (2015) would pay for ‘off-site’ provision, directly funding new and enhanced play equipment close to the site as part of a strategic approach. For example, if this scheme fell short on provision for each age group, the contribution would go towards new or existing park spaces within the OKROA.
- 187. Using the GLA’s latest Population Yield Calculator (v3.2) and assuming Inner London and a PTAL of 0-2, the scheme generates a total child yield of 43.4, which equates to a total play space requirement of 434.2 sqm. In total 201 sqm of play space is provided on site.
- 188. The play space areas for each age group is provided on the rooftop terrace of Block C. The design would incorporate landscaped features amongst a variety of play equipment that would be suitable for both children and toddler play. This will also require the submission of detailed planting and screening, and a detailed drawing condition requiring designs of the landscape, including all play provision, will be secured by condition. This will be required to include water and sand play.

Children’s Play Space Calculations

Table: Proposed areas of dedicated external play

Location	Area of dedicated play space
Rooftop terrace Block C	201 sqm

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

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

Dedicated outdoor child play Space. This can be provided in either the communal or public open space but must be provided in addition to that space, rather than as a sub set of that space.	Required play space based on child yield.	Proposed play space	Shortfall
0-4 years 5-11 years 12+ years	141 sqm (187 sqm required) 60 sqm (144 sqm required) 0sqm (103.2 sqm required)	Play space proposed for all children located on the roof terrace of Block C	233.2 sqm

190. In accordance with the Section 106 Planning Obligations and Community Infrastructure Levy (CIL) SPD, any shortfall in the required amount of child play space will be charged at £151 per square metre. £151 per square metre is an average cost in Southwark for improving play space. Whilst it is acknowledged that there is play space proposed for children up to 11 years old, there is still a shortfall of 130sqm for toddler and younger children play space. In addition, as there is no provision for the 12+ age groups there would be an overall shortfall of 233.2 sqm in children’s’ play space. This shortfall would therefore generate a financial contribution of £35,213.20 in line with the Section 106 Planning Obligations and Community Infrastructure Levy (CIL) SPD (2015). It should be noted that there are ongoing projects to improve neighbouring park spaces, including Bramcote Park using s106 money, and that the area masterplan proposes a new park space adjacent to this development which these off site payments would help fund.

Public Open Space

191. Policy AAP11 of the draft OKR AAP requires the provision of 5 sqm of public open space per proposed home. Any shortfall 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. The development proposed is a mix of co-living and a conventional housing. Supporting paragraph 4.1.9 of the London Plan states that co-living accommodation contributes towards meeting a Borough’s housing targets at a ratio of 1.8:1. As such, the proposed 283 No. co-living units at a ratio of 1.8:1 will contribute the equivalent of 125 No. new residential dwellings, along with the 47 No. conventional residential units to a total amount of 172 No. residential units towards Southwark’s borough wide housing targets.
192. The subject site is not identified within the OKR AAP as a site that provides public open space. Nevertheless, in line with the aspirations of policy AAP 11 ‘Parks and Healthy Streets – The Greener Belt’ of the OKR AAP, where on site provision is not required, a contribution of 5 sqm of public open space per dwelling, will be secured through the S106 as an in-lieu financial contribution.

Public Open Space Calculation

Table: Public open space proposed

Public Open Space (Public space at ground floor, excluding play space)	Draft OKR AAP (2017) requirement AAP 11: Parks, streets, open spaces –The Greener Belt. (page 73)	Proposed public open space	Off-site Payment
	Provide 5 sqm of public open space per dwelling. If it is not feasible to deliver the open space on site, a financial contribution will be required. 860 sqm required	0 sqm	860 sqm shortfall 860 sqm x £205 = £176,300

193. As set out in the table above, a financial contribution would be required. The shortfalls in both play space and public open space amounts to £211,513.20. The payment of the financial contribution, which would be secured through the Section 106 Legal Agreement. The money would go towards the maintenance and improvements of existing and new public parks and spaces within the Old Kent Road Opportunity Area.

Sunlight Amenity Analysis within the Proposed Development

194. BRE guidance for overshadowing to gardens and open spaces within a development recommends that at least 50% of any garden or amenity area should receive at least one hour of sunlight on 21 March. The overshadowing results show that the amenity

areas within the proposed development would enjoy good levels of sunlight on the 21st March and receive at least 2 hours of direct sunlight to 52% (podium level), 47% (roof terrace between blocks A & B), 92% (the roof terrace of Block B) and 87% (the roof terrace of Block C) of the total areas. Whilst the amenity area between blocks A & B would enjoy 2 hours of direct sunlight slightly under the recommended 50% target, this is only marginal and on balance, is considered to be reasonable given the context scenario of the garden in between the buildings in the development.

Conclusion on Outdoor Amenity Space, Play Space and Public Open Space

195. In conclusion, whilst the shortfall in play space is acknowledged the private, communal and play space proposals are of good quality with the locations of the amenity spaces are well thought out to maximise benefit from natural daylight and sunlight. The mix of private amenity options including projecting and inset balconies are spacious for residents to enjoy. The children's play space would provide a mix of imaginative and informal play options for children within the development. The landscape proposals for the external terrace areas are efficiently planned which is a positive aspect of the scheme. To ensure the spaces delivered are of the highest quality, detailed landscape design and children's play space are secured by condition and attached to this decision notice.
196. On site public open space is not required on this site by the AAP. Consequently, a financial contribution will be secured in the S106 Agreement alongside a contribution for the shortfall from the children's play space within the scheme. The agreed financial contributions would directly fund provision of new and refurbishment of existing open spaces and parks within the opportunity area. Overall, the provision of private and communal amenity space on site is a positive aspect of the scheme, and the children play space provision whilst falling short of requirements would be of a good quality.

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

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

Impact of the Proposed Uses

198. The retention of the existing James Glancy Design on an improved floor space along with the introduction of additional commercial floor space to ground and mezzanine levels is considered to provide activation of the site at ground floor level, and would enhance the vitality and vibrancy of Hatcham Road, Penarth Street, and Ormside

Street that surrounds the subject site. Additionally, the introduction of Sui Generis Co-living studios and conventional residential housing under Use Class C3 complies with the intentions of this site within OKR16 of the OKR AAP. On this basis, it is considered that the proposed uses would not cause any harm to surrounding neighbour amenities, and accordingly are all found to be acceptable uses.

Daylight and Sunlight Impacts

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

BRE Daylight Tests

200. Guidance relating to developments and their potential effects on daylight, sunlight, and overshadowing is given within the 'Building Research Establishment (BRE) Report 209 Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice 2nd Edition (2011)' (BRE, 2011) and also in 'Lighting for Buildings Code of practice for daylighting (AMD 7391) BS 8206-2:1992' (BSI, 2008). The Building Research Establishment's (BRE) Site Layout Planning for Daylight and Sunlight, a guide to good practice (1) gives criteria and methods that are explained subsequently for calculating DSO effects on surrounding receptors as a result of the proposed development.
201. While the BRE benchmarks are widely used, these criteria should not be seen as an instrument of planning policy. As stated in the Introduction to the BRE Guidelines paragraph 1.6:
- “The guide is intended for building designers and their clients, consultants and planning officials. The advice given here is not mandatory and the guide should not be seen as an instrument of planning policy; its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design.”
202. 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.
203. The BRE guideline tests undertaken for this daylight assessment are the Vertical Sky Component (VSC) and No Skyline (NSL). The VSC test calculates the angle of vertical sky at the centre of each window and plots the change between the existing and proposed situation. The target figure for VSC recommended by the BRE is 27%, which is considered to be a good level of daylight and the level recommended for habitable

rooms with windows on principal elevations. The BRE also advises that VSC can be reduced by about 20% of its original value before the loss is noticeable. In other words, if the resultant VSC with the new development in place is less than 27% and/or less than 0.8 times its former value, then the reduction in light to the window is likely to be noticeable.

204. The distribution of daylight within a room can be calculated by plotting the NSL. The NSL is a line which separates areas of the working plane that do and do not have a direct view of the sky. Daylight may be adversely affected if, after the development, the area of the working plane in a room which can receive direct skylight is reduced to less than 0.8 times its former value.

BRE Sunlight Tests

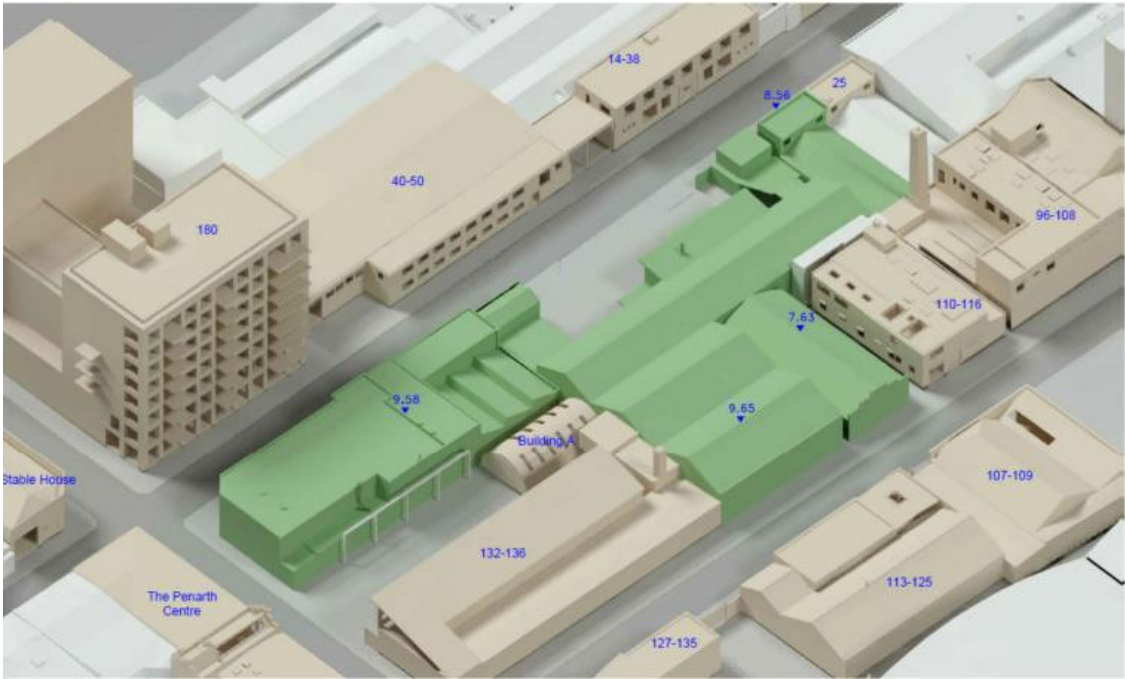
205. The BRE sunlight tests should be applied to all main living rooms and conservatories which have a window which faces within 90 degrees of due south. The guide states that kitchens and bedrooms are less important, although care should be taken not to block too much sunlight. The tests should also be applied to non-domestic buildings where there is a particular requirement for sunlight. The BRE guide states that sunlight availability may be adversely affected if the centre of the window:

- receives less than 25% of annual probable sunlight hours, or less than 5% of annual probable sunlight hours between 21 September and 21 March and
- receives less than 0.8 times its former sunlight hours during either period; and
- has a reduction in sunlight received over the whole year greater than 4% of annual probable sunlight hours.

Overshadowing

206. 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.'
207. Given the predominantly industrial nature of the subject site and its immediate surroundings, the closest neighbouring property is 180 Ilderton Road. This is located adjacent to the site with the most affected units being the west and south facing units fronting Hatcham Road.

Image: Plan demonstrating subject site (green), and surrounding context



Impacts

180 Ilderton Road

Image: Context of 180 Ilderton Road to subject site in existing and proposed condition



208. The VSC methodology undertaken demonstrates that of the 78 No. windows tested, 13 No. windows are compliant with the BRE guidelines by achieving at least 27% VSC. The remaining 65 No. windows do not adhere to the guidelines with tests showing that these windows obtain VSC levels between 1.72% and 26.46%. It is noted that these windows are affected by restricted light because of the projecting balconies provided within the development for private amenity. Tests undertaken with the application site being undeveloped demonstrates that 26 No. windows would achieve VSC level ranging from 15.38% to 39.55%.
209. Regarding NSL tests undertaken, the results show that of the 62 no. rooms tested, 11 No. rooms would continue to experience a good level of daylight distribution that is in excess of the BRE guidelines. For the remaining 51 No. windows, 28 No. service bedrooms which is deemed less important by BRE guidelines in comparison to main living room. The other 23 No. rooms are made up of 19 No. living/kitchen/dining rooms (LKD's) and 4 No. kitchen/dining rooms (KD's). The results undertaken demonstrates that the LKD's would experience reductions between 0.12 and 0.59 their former values, and the results of the KD's shows that there would be reductions between 0.25 and 0.77 their former values.
210. It is noted that these rooms have been designed with greater than 5 metres in depth, which makes complying with the NSL test difficult. When discussing rooms, BRE guidelines highlights that when rooms have a greater depth than 5 metres, then a larger reduction in the NSL may be unavoidable, and as can be seen by the results above that this has been demonstrated in the tests undertaken.
211. In terms of the sunlight test, the results show that out of 70 No. windows tested, 16 No. windows adhere to the BRE guidelines criteria for sunlight, by obtaining APSH levels of at least 25, including at least 5% in the winter months in the proposed condition. Given that the remaining 54 No. windows are orientated due west, they therefore only receive sunlight in the afternoon. Given that these 54 No. windows are not orientated due south they were not assessed, in line with the BRE guidance.

Overlooking of Neighbouring Properties

212. In order to prevent harmful overlooking, the Residential Design Standards SPD requires proposed developments to achieve a distance of 12 metres between the front elevations of buildings and/or across a highway, and a minimum of 21 metres between rear elevations.
213. The northern portion of the subject site sits on a corner plot at the junction of Penarth Street and Hatcham Road. The development sites then extends circa half way down the Hatcham Road frontage before tucking back in and creating a T-shaped development with a frontage onto Ormside Street. The closest residential property is 180 Ilderton Road. This site sits across the highway from the subject site. The subject development has been setback from the Hatcham Road frontage to improve not only public realm and the pedestrian experience working past the site, but to also comply with the minimum distance for buildings located across a highway from one another.

The distance between the two developments is circa 14 metres which exceeds the minimum separation distance of 12 metres as set out in Southwark's adopted SPD.

TRANSPORT CONSIDERATIONS

214. Policy P50 'Highways impacts' of the Southwark Plan 2022 seeks to ensure that developments minimise the demand for private car journeys. In addition, the policy requires developments to demonstrate that the road network has sufficient capacity to support any increase in the number of the journeys by the users of the development, taking into account the cumulative impact of adjoining or nearby development. As this is a Southwark council application and therefore any requirements will be contained in the unilateral undertaking.
215. In assessing this application from a transport perspective, the site is located in an area that the council is considering pedestrian, and cycle changes to enable healthy streets. The proposals will not prevent these plans being delivered.
216. Southwark has recently adopted its Movement Plan, a people, place and experience approach to transport planning rather than a modal one. This application has been assessed on how it will contribute to the 9 No. stated Missions.
217. The Mayors Transport Strategy (MTS) includes three strategic challenges that are of significant importance in assessing the subject application.
- Good Growth
 - New homes and jobs
 - A good public transport experience
218. The submitted Transport Assessment (TA) is considered to provide an adequate appraisal of the relevant transport and highway related matters including an assessment of the potential for journeys to be made by sustainable modes of transport. The TA also includes detailed estimates of vehicular trips resulting from the development.
219. Officers have reviewed this application and identified the following areas for detailed comments:
- Access and Road Safety – The safe movement of all modes entering and exiting the public highway
 - Trip Generation –The existing and proposed trips related to the site
 - Servicing and Delivery – How the development will manage the vehicular trips required
 - Car Parking - How the development will manage the vehicular trips required
 - Public Transport – Current access and future potential
 - Active Transport – Walking and cycling and behaviour change

Existing Site Layout

220. The existing buildings on the subject site are principally formed of two-storey buildings accommodating a range of commercial spaces occupied for light industrial and office uses. Whilst the site is formed of smaller units, they are principally occupied by James Glancy Design at present. Vehicular access into the site is achieved in a number of locations across Ormside Street, Penarth Street and Hatcham Road formed of vehicular crossovers to serve individual units.

Proposed Site Layout

221. The proposed future site layout will increase footway widths improving the pedestrian movement along Hatcham Road and Ormside Street. The proposed access arrangements and loading bay will be detailed up as part of the S278 agreement. The Council programme for the CPZ includes this area and subject to consultation will be implemented within the next two years. The Council is introducing improved cycle routes from Rotherhithe to Peckham, this proposal does not impede on that project. Pedestrians will be required to utilise the two co-living entrances on Hatcham Road and at the corner of Hatcham Road and Penarth Street. With respect to the commercial elements of the scheme, access can be gained directly into each of the three elements / units with access achieved from both Hatcham Road and Ormside Street. Access to the affordable housing block of the development will be achieved directly from Ormside Street. A Condition requirement for the detailed design of the landscaping and public realm will ensure secure by design and road safety is fully considered.
222. The proposal has included tracking of the commercial access and residential access to ensure sufficient swept paths for a variety of vehicle sizes. All works within the extent of the S278 for Southwark will be done in accordance with Southwark Street Design Manual SSDM and TfL's Healthy Streets design guidance.

Trip Generation

223. The proposed scheme will generate largely sustainable methods of trips, and the TA estimates servicing demand for the 21 No. motorised vehicular trips per day. This consists of 15 No. motorised vehicular trips per day for the commercial element of the scheme, and 6 No. motorised vehicular trips for the residential component.

Servicing and Delivery

224. The development proposes a new through route across the subject site between Ormside Street and Hatcham Road to provide a 6 metres wide route that aligns with the principles of the OKR AAP. The central servicing route will serve the employment uses within the scheme and will be provided with two loading areas which will be designed to accommodate the largest vehicles available. It is envisaged that the route will be one-way only with entrance from Ormside Street, and exit on to Hatcham Road. This reflects the wider strategy for vehicle movements across the surrounding area. In addition, a single van sized loading bay located in the north eastern corner of the subject site.

225. The residential and co-living uses will be provided with a single loading bay each measuring 10 metres in length providing in appropriate locations on Ormside Street and Hatcham Road. The introduction of a suitable servicing route through the development is in accordance with the principals for the site contained within the OKR AAP and a condition is attached to this permission regarding the alignment and design of the route.
226. As part of the proposals the completed site will be supported by a management team and it is proposed that the management team will act as the co-ordinator of this Delivery Service Management Plan (DSMP). As part of their duties the management team will manage and control the flow of delivery and servicing vehicles to the dwellings and commercial units.
227. In order to ensure that on-street servicing and deliveries do not negatively impact on the highway network, the Council is recommending that applicants in the Old Kent Road Opportunity Area enter into Delivery Service Plan Bonds against their baseline figures for all daily servicing and delivery trips. These bonds would be calculated at £100 per residential unit and £100 per 500 sqm of non-residential floor space. In accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010, this is not intended as a financial penalty, but as a means of mitigating any harmful impacts from the proposed development and ensuring a better quality of life for current and future residents. As such, it is considered to meet the CIL Regulation 122 test, in that it would be:
- (i) necessary to make the development acceptable in planning terms;
 - (ii) directly related to the development; and
 - (iii) fairly and reasonably related in scale and kind to the development
228. The proposal is for the management team of the new development to monitor the daily vehicular activity of the site for both commercial and residential accommodation, quarterly for a period of 2 years from 75% occupancy. If the site meets or betters its own baseline target the bond will be returned within 6 months of the end of the monitoring period. If the site fails to meet its own baseline the bonded sum will be made available for the council to utilise for sustainable transport projects in the ward of the development.
229. All uses in the development will be subject to a condition on the marketing and promotional material related to the work to ensure this is explicit in how the development has been designed to discourage private cars and encourage sustainable living, working and visiting. In addition, a final DSMP is secured by condition and attached to this decision notice.

Car Parking

230. The residential element of the development will be car free, excluding the provision for blue badge car parking. 3 no. disabled parking spaces are proposed on Hatcham Road to serve the co-living studios in Blocks A and B, together with 2 No. disabled parking spaces on Ormside Street to serve the affordable housing units in Block C. It is also noted that Southwark has ambitions to implement a Controlled Parking Zone (CPZ)

that further reiterates the benefits of a car free development with the exception of disabled parking spaces being provided. Additionally, there will be a S106 obligation that prevents residents and office users of the proposed development from obtaining resident parking permits.

Public Transport

231. The site is served by local bus route P12 with the Bus Stop located on Ilderton Road approximately 70 metres to the east, and is circa 400 metres to the north of the junction with Old Kent Road where more bus services are located. The nearest rail station to the site is South Bermondsey Station which is located circa 800 metres north of the site, or a walk of 11 minutes. As a borough Southwark agrees with TfL that bus services will need to be increased in the area ahead of the BLE to accommodate the demand generated by additional homes and jobs generally in the Old Kent Road area. The requirement for TfL to provide evidence to prove both previous contributions has been spent appropriately and the evidence for the further draw is the fairest way this could be managed. The proposal is that there is a maximum cap for TfL to call on which is £2,700 per unit. Given the nature of the development proposing 47 No. conventional residential units and 283 No. co-living, the conventional housing contribution consists of £126,900 with the co-living contribution calculated through the 1:3 ratio adding £254,700. This provides a total contribution of £381,600. The ratio calculation for the contribution amount from the co-living units has been agreed by TfL and the GLA.

Active Transport

Walking and public realm

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

Cycling

233. The site is located close to Quietway 1 which links Greenwich with the West End. In addition, there are a number of cycle routes within close proximity to the site. These routes provide useful connections to key public transport interchanges, such as South Bermondsey, Elephant and Castle and London Bridge. Cycle parking needs to be increased in order to ensure that it will be provided in line with the London Plan 2021 standards.
234. The long-stay cycle parking for the employment spaces, the co-living blocks and the affordable residential block are all separate from one another and related to each use. The cycle store for the co-living accommodation is located at mezzanine levels between Blocks A and B and will be accessible via the lifts and stairs in Core B1. The cycle store for the affordable residential accommodation will also be located at mezzanine level in Block C and will be accessible via the lifts and stairs in Core C1.

Access to all long-stay cycle stores will be step-free, achieved via a suitably sized lift (measuring 1.2 metres by 2.3 metres in size).

235. A high proportion of cycle parking spaces are formed of Sheffield stands to make the cycle parking as accessible as possible for all users, and aisles within the cycle stores will measure at least 2.5 metres in width. A condition is attached to this decision requiring detailed design of the cycling parking provision. The S106 Agreement will include a contribution towards the delivery of a new Cycle Hire Docking station of £50 per residential unit.

Construction

236. A Draft Construction Management Plan has been prepared as a standalone document submitted along with this application. The S106 Agreement would secure a detailed Construction and Environmental Management Plan (CEMP) and a £40 contribution per conventional residential unit and a ratio of 1:3 for the co-living units for Construction Management within the OKR AAP area. This is to enable the Council to manage cumulative impacts on the highways and environment.

Conclusion on Transport

237. The proposal is supported as it will reduce car dependency which will contribute to the efforts against climate change and to the delivery of some of the Movement Plans 9 No. missions. In particular, these include Vision Zero and Healthy Streets, and allows for the emerging plans for the surrounding public highway to be facilitated subject to the adherence to the S106 obligations and planning conditions mentioned in this section of the report.

ARCHAEOLOGY

238. The site is within the 'Bermondsey Lake' Archaeological Priority Zone (APZ), which is designed to protect the palaeontological environment and prehistoric archaeology recovered from the shoreline and relict fills of the large Late Glacial Bermondsey Lake and the associated riverine geology and topology. The site is also close to the 'Old Kent Road' APZ, which has the potential to contain features associated with the former route of 'Watling Street', the major Roman road between London and Canterbury. When the New Southwark Plan is adopted, the site will lie within the newly extended 'North Southwark and Roman Roads' Tier 1 Archaeological Priority Area (APA).
239. 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.
240. The applicants have submitted a desk-based assessment that provides a level of summary of the archaeological potential of the site. Archaeological work near to the

site identified prehistoric archaeological remains and this site is on the projected course of the prehistoric trackway first identified at Bramcote Grove. Whilst the scheme does not include a basement level it also includes no details of attenuation tanks. Any impacts below ground level will need to be assessed archaeologically with an archaeological evaluation. Should the remains of the Bramcote Grove trackway be present these will require preservation in situ, monitoring and means to recover such remains should the means for their preservation in situ fail.

241. These are remains of national significance and are rare and highly instructive as to the management of the prehistoric landscapes of north Southwark. Full opportunity should be taken to examine and monitor any site investigation works undertaken prior to construction. Conditions are attached to the decision notice that will assist in preserving any potential remains found on site.

AVIATION

242. The National Air Traffic Safeguarding Office (NATS) was consulted and has confirmed that the proposed development has been examined from a technical safeguarding aspect and does not conflict with its safeguarding criteria.

TV AND RADIO SIGNALS

243. Arqiva own and operate the UK Terrestrial Television Broadcast network and supply the Freeview platform. It also owns and operates 90% of the UK Radio Broadcast network, through which it broadcasts the full range of BBC and commercial radio stations. In addition, many sites that it owns or manages are shared by other operators, such as BT, the Mobile Network Operators, Airwave (Emergency Services Networks), roadside services and Central and Local Government departments and agencies.
244. Arqiva has considered whether the subject development is likely to have an adverse effect on its operations and has concluded that there will be no impacts, and therefore Arqiva has no objections to the proposal.

ENVIRONMENTAL CONSIDERATIONS

Refuse and Waste

245. A Refuse Strategy has been submitted with the application which outlines the waste proposals over all phases of the development. The waste generation metrics used in this Strategy are based on Southwark's Waste management guidance notes for residential developments.
246. For the affordable housing building (Block C) the refuse will be accessed only from Ormside Street, close to the point at which refuse vehicles will alight. Residents will access the store via the stair or lift from the outside of the building, immediately

adjacent to the main entrance and lift core. In terms of the commercial waste, the occupiers of the commercial space will manage waste storage within their own demise, accessed either from the street or via the vehicle servicing route proposed as part of the development.

247. Co-living residents within Blocks A and B will use the refuse chutes within each block to dispose of both general waste and recycling. The chutes are separated from common corridors via fire rated doors and ventilated lobbies. The co-living aspect of the scheme will be operated by management who will replace eurobins below the chutes when full. Refuse stores are located adjacent to and accessed directly from Penarth Street for Block A and Hatcham Road for Block B. These locations are within close proximity to collection points where refuse vehicles can alight.

Wind and Microclimate

248. A microclimate is the distinctive climate of a small-scale area and the variables within it, such as temperature, rainfall, wind or humidity may be subtly different to the conditions prevailing over the area as a whole. The main characteristics of microclimates within London are temperatures and wind. As the development does not propose a large area of space between the two buildings, the scheme is not of a scale that could potentially have any significant impact on wind conditions around the site or any adverse effects on pedestrian and residents' comfort.

Fire strategy

249. 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.
250. A Fire Statement Form and Fire Safety Strategy by OFR Consultants has been submitted with this application. The strategy demonstrate how the development would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel. The provision of a suitably-sized evacuation lift in the residential core is also proposed in line with Policy D5 of the London Plan. The measures contained within the statements are secured by condition within the decision notice
251. The health and Safety Executive has reviewed the submitted Fire Statement Form and Fire Safety Strategy, and in their response raised an issue regarding Block C1 cycle storage being only accessible by lift. This issue was raised as a firefighting lift should not provide access to any floor without the provision of a firefighting stair also serving that floor because the staircase is the line of retreat should the lift fail. Similarly, as staircase C1 is the single staircase serving dwellings, it should not also serve ancillary accommodation such as the cycle store
252. Following advice from the HSE, revised plans have been submitted which demonstrate that the design updates address the comments raised by the HSE and the recent policy position adopted by the GLA. The relocation of the second stair core in Block

A means that Block A will have two stair cores. The design rationalisation of Block C means that it sits below the relevant threshold of 30 metres and, as such, a second stair core is not required. The commercial development at the ground and mezzanine level would be required by condition to be fitted with a sprinkler system.

Flood Risk and Water Resources

253. The application site is located within Flood Zone 3 of the River Thames which is tidally influenced at this location, although in an area shown to be benefiting from existing flood defences. Flood Zone 3 is classified as comprising land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%) or a 1 in 200 or greater annual probability of tidal flooding (>0.5%). Flood defences are indicated to be in good condition and afford the Site a standard of protection up to the 1 in 1000 year event.
254. The Environment Agency (EA) has reviewed the submitted information in relation to flood risk and has no objection to the proposed development.
255. The development proposes to manage rainwater via a system of blue roofs in addition to raised planters and trees on the roof system. Infiltration has been justifiably discounted due to as the footprint of the developments takes up the majority of the site. The SuDS features cannot discharge into a watercourse or surface water sewers as there are none in the vicinity. The surface water will be discharged into combined sewers at three locations.
256. The proposed runoff rate is 5.6l/s, which is higher than the 1 in 100 year greenfield runoff rate. However, justification has been provided as to why the greenfield runoff rate cannot be met (the building footprint fills the entire footprint and therefore below ground SuDS cannot be included, and the blue roof attenuation system has been increased in depth as much as is feasible). Additionally, the attenuation volume proposed is equal to or greater than the attenuation volume required. It has been demonstrated that the site will not flood as a result of the 1 in 30 year rainfall event, that there will be no flooding of buildings as a result of events up to and including the 1 in 100 year rainfall event, and on-site flow as a result of the 1 in 100 year event with a climate change consideration will be suitably managed.
257. Southwark Flood Risk Department raise no objection to the findings and recommend that a pre-commencement condition and pre-occupation condition be attached to this decision. These conditions have been attached to ensure compliance with the recommendations of the Flood risk Officer.

Ground Conditions and Contamination

258. A Phase 1 Desk Study was carried out by Southern Testing in March 2021 (report ref. J14709-DS) and indicates that the site has a history of industrial use and concluded that, based on the desk study search and walkover survey carried out on the site, the overall risk of on-site contamination associated with both historical and current land use is considered moderate to high. The risk of off-site contamination migrating on to the subject site from contemporary sources is considered low to moderate.

Considering the proposed development is to be largely hard covered, however, the exposure risk, in terms of the end users, is considered to be low. Despite this, there is a potential risk to site workers during the groundwork stages of the development and also a risk to proposed services, structures and the underlying aquifers.

259. A single phase of intrusive investigation was carried out. Due to the presence of existing buildings onsite, and as the company on site was still operational, the borehole locations were restricted during the site investigation works. It should not be assumed that the same ground conditions would apply to these inaccessible areas. The soils encountered comprised a covering of Made Ground over clays, sands & gravels of the Kempton Park Gravel member, over silty fine sand of the Thanet Sands, over Chalk with flints.
260. Southwark's Environmental Protection Team (EPT) has reviewed the Phase 1 assessment and following review recommends that a Phase 2 site intrusive investigation is undertaken before any works commence on site. The recommended condition is attached to the decision notice.
261. The Environment Agency has reviewed the proposals in relation to contaminated land and made the following recommendation.
262. "Any unexpected contamination encountered during development of a site should be reported to the Environmental Health Officer (EHO) in accordance with *Building Regulations Approved Doc C*."

Air Quality

263. The subject site is located in the Southwark Air Quality Management Area which is designated for the potential exceedance of the annual mean nitrogen dioxide (NO₂) and daily mean PM₁₀ air quality objectives. Southwark Plan Policy P65 'Improving air quality', states that development should address the impacts of poor air quality on building occupiers and public realm users by reducing exposure to and mitigating the effects of poor air quality.
264. As part of the submitted Air Quality Assessment submitted by Hydrock dated 15th November 2021, a qualitative construction dust risk assessment has been undertaken in line with GLA guidance. The dispersion modelling assessment indicates the impact of the proposed development on local air quality will be Negligible for all pollutants of concern (NO₂, PM₁₀ and PM_{2.5}) as no exceedances of the relevant AQS objectives were identified. Additionally, future receptors at the proposed development will not be introduced to an area of poor air quality, as no exceedances of the AQS objectives were identified across the subject site. The site is classified as APEC A for both NO₂ and PM₁₀. As such, the overall effect arising from the Proposed Development is considered to be 'not significant'. The proposed development is also considered air quality neutral in accordance with the London Plan.

Agent of change

265. 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.
266. Adjoining the site to the northwest is the building comprising of Diespeker which specialises in marble, granite, terrazzo and limestone manufacturing. Diespeker has recently signed a 15 year lease as a long term strategy to stay at its current site and expand its business. This will allow it to take on more local staff in the process. In addition to this, Diespeker is investing in new automated machines that will run 24 hours a day, to keep pace with growing business demands.
267. The proposed scheme has been designed to not be prejudicial to the daily business activities on site at Diespeker. It is also designed to enable Diespeker to redevelop the site in the future. To facilitate this, Block C has a blank side façade on the boundary onto which any future development at the site could connect. The approach with Block A has been to provide a recess from the boundary which is assumed will be replicated in any future redevelopment at Diespeker in order to maintain adequate light levels to the Penarth Centre to the north. Hence building A has windows on the flank elevation to provide some outlook, though these are to kitchens and the lift/stair core and hence are not sensitive to potential future development on the Diespeker site.
268. Notwithstanding, it is noted that the western elevation of Block A consists of 70 co-living units from floors one through to nine that will face onto the Diespeker manufacturing yard. One of the core points raised in the objection to the development that Diespeker made was the impact of these co-living units on the western elevation of Block A being subjected to the existing noise generated by works undertaken during day to day business.
269. In acknowledging the above, and in accordance with Agent of Change principles whereby existing businesses remain viable without unreasonable restrictions being imposed, the Council and applicant have agreed to the following condition being attached to the decision notice:

Prior to commencement of development above slab level a scheme shall be submitted for approval to the Council to ensure that the windows to the 70 co-living studios on the western elevation of Block A shall remain fixed shut until the neighbouring Diespeker site has been redeveloped unless otherwise agreed in writing with the Council or such time as the adjoining premises at 132-136 Ormside Street are redeveloped. The scheme shall be implemented and maintained thereafter in accordance with such approval.

Reason:

To ensure that the agent of change principle is implemented and that the residential environment meets an acceptable standard and existing adjoining commercial premises are not adversely impacted.

270. By imposing the above condition, any future occupier of the 70 co-living units facing towards Diespeker will be in breach of condition should they wish to open a window on the western elevation. It is therefore considered that this condition will ensure that the development does not harm the future operations of Diespeker. The co-living rooms will consequently have to be mechanically ventilated. Whilst not ideal this is considered to be a reasonable compromise that addresses the agent of change principle, whilst securing the delivery of a mix of residential and commercial uses as promoted in the OKRD AAP. Additionally, the layout and design of the development will not prejudice the potential future redevelopment of the Diespeker site and thereby complies with London Plan Policy D13.

Noise and Vibration

271. A revised Environmental Noise Survey and Acoustic Design Statement, prepared by Hann Tucker Associates (HTA) dated 30.1.23 has been submitted as part of the planning application. Paragraph 12.3 of the report refers to the Diespeker factory. The assessment undertaken demonstrates a noise rating specification that has been set out for each façade, which responds to the particular noise environment it faces onto. This specification has been designed to ensure that the noise environment within the apartments and other spaces within the development meet the relevant standards and are appropriate for the intended use through the daytime and night time.
272. As part of its objection to the proposed development, Diespeker has raised issues regarding the section 11.2 of the report undertaken by HTA. The section in question has assumed noise levels from the factory to be limited to 9.00am to 5.30pm Monday to Friday, 10.00am to 2.00pm Saturdays and closed on Sundays. These opening hours listed are incorrect as Diespeker can operate up to 24 hours a day including weekends if they have an important job to undertake, which includes the use of automatic machines being in operation overnight.
273. As part of the revised submission from HTA, an environmental noise survey was conducted using both manned and unmanned monitoring through 24hrs over an extended period of time (over 1 week) and on a number of separate occasions. The results from this shows that there is both relatively high background noise levels as might be anticipated in an employment area and specific, intermittent industrial noise sources (from Diespeker) that have a specific character or tonality.
274. To assist in mitigating against noise levels conditions regarding Internal Noise Levels, noise transfer between habitable rooms, and between commercial and residential uses are attached to this decision notice along with a condition covering the rated sound level from any plant and associated ducting that are to be calculated fully in accordance with the methodology of BS4142:2014+A1:2019. These conditions are proposed to not only mitigate potential noise creep from within the development, but

to also adequately mitigate against high background noise levels from the neighbouring Diespeker site during working hours.

275. Having considered the noise assessment the Council's Environmental Protection Team (EPT) confirmed that they objected to the proposal on the basis that the new co living residential dwellings facing the Diespeker yard space (Block A) would be affected by various commercial noise sources without adequate design mitigation. The EPT team would usually advise that the scheme design is changed to avoid exposing the residential to the source of the noise, although they acknowledge in this instance that the site and its neighbours are part of a wider masterplan that the council is looking to deliver through the OKRD AAP. With this in mind further discussions were held with the developer and as noted above they have agreed to a condition that would require the effected co living rooms to have their windows fixed shut until further progress is made on masterplan delivery. . This should enable Diespeker to continue operating on their site as well allowing for their sites redevelopment in line with the aspirations of the AAP at a future date, should Diespeker choose to do so. Whilst this approach does compromise the residential quality of the co-living spaces effected, something that EPT have also raised, it is considered on balance to be an acceptable approach to securing the AAP masterplans long term delivery on a series of sites in multiple ownerships
276. In this instance, there is proposed to be a condition imposed on the application whereby the residences with windows directly facing Diespeker will be designed with locking mechanisms to prevent those residents from opening the windows. It seeks to ensure that the residents will not be adversely affected by the adjoining commercial activities and operation and also to protect the commercial activities and operations of the adjoining company. This is an interim measure and solution to ensure that the application can be supported and that the adjoining company's commercial activities and operation can continue in-situ until such time that the redevelopment of the neighbouring sites comes forward.
277. As such, the interim design solution with the wider masterplan objectives is on balance seen to outweigh the concerns of the Council's EPT and would meet the objectives of the development plan as it relates to the Agent of Change principle

SUSTAINABLE DEVELOPMENT IMPLICATIONS

Energy

278. 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.

279. Policy P70 of the Southwark Plan sets out the borough approach to ensuring that new developments tackle climate change. The approach is generally consistent with London Plan Policies but also requires new commercial developments to meet BREEAM 'Excellent'. The policy also states that residential developments must reduce carbon emissions on site (100% on 2013 Building Regulations). Southwark Council's carbon offset cost is £95 for every tonne of carbon dioxide emitted per year over a period of 30 years. This is the equivalent of £2,850 per tonne of annual residual carbon dioxide emissions.
280. An Energy Assessment and Sustainability Strategy based on the GLA energy hierarchy has been submitted by the applicant. This details how the targets for carbon dioxide emissions reduction are to be met. A combination of 'Be Lean' 'Be Clean' and 'Be Green' measures have been employed in an attempt to achieve the reduction in line with the GLA guidance on preparing energy statements, Southwark Plan Policy P70, and the Southwark Sustainable Design and Construction SPD.

Be Lean (use less energy)

281. The Energy Strategy has prioritised a reduction in energy demands at the 'Be Lean' stage by specifying a series of passive and active measures to reduce demand for energy through a high-performance building fabric alongside the specification of highly energy efficient ventilation and lighting. The 'Be Lean' measures proposed will result in an estimated reduction in regulated CO₂ emissions of 55.6 tonnes CO₂ per year, which equates to a 22% reduction when compared to 'Baseline' emissions rate, using SAP10 carbon intensity factors. This represents a 23% reduction for domestic areas and a 17% reduction for the non-domestic areas using SAP10.

Be Clean (supply energy efficiently)

282. Having minimised the demand for energy, the energy systems have been selected in accordance with the hierarchy for selection:
- I. Connect to an existing decentralised energy network; then
 - II. Be future-proofed to connect to a planned decentralised energy network; or
 - III. Implement a site-wide low carbon communal heating system; and
 - IV. Explore and evaluate the potential to oversize the communal heating system for connection and supply to adjacent sites and, where feasible be implemented.
283. The SELCHP DHN is operated by Veolia, and preliminary discussions have taken place with the applicant, and are ongoing with the operators about the potential to connect to this network, with Veolia confirming that Ilderton Road is an area where a plan to install a DHN in the coming years. The strategy for the development is therefore to connect to this DHN.
284. In the interim, a strategy has been proposed that incorporates a central Air Source Heat Pump (ASHP) system into the development. The heat load profile of the residential units is favourable, and in the short term this site-wide low carbon central heating system will provide the best carbon savings over a purely gas boiler system. Furthermore, the central ASHP system will be future proofed in order to connect to the SELCHP network when it is available.

285. The proposed central ASHP heating system, supplying both space heating and domestic hot water supply to all units, produces a 39% carbon reduction for the Domestic assessment with the Non-domestic areas providing a 7% carbon reduction. The overall site-wide carbon reduction is 33%. It is noted that once connect to the SELCHP DHN is enabled, the carbon reduction savings will substantially increase.

Be Green (Low or Carbon Zero Energy)

286. The Energy Statement details several technologies that have been explored for the Be Green measures to be installed within the scheme. Of the technologies reviewed, Air Source Heat Pump technology to generate low carbon heat, to serve the building's space heating and domestic hot water requirements has been proposed alongside Photovoltaics (PV). The PV panels have been chosen to generate renewable energy with the provision to be provided on the roof of Block A. 43 panels can be accommodated assuming 300Wp/panel = 12.9 kWp.

287. The proposed implementation of low these technologies provides an overall site-wide carbon reduction of 1% - comprised of a 0% carbon reduction for the Domestic areas, and a 10% carbon reduction for the Non-domestic areas.

Energy conclusion

288. The development adheres to the energy hierarchy, heating hierarchy and cooling hierarchy. The systems specified represent the best available for the development to save carbon while future proofing to allow connection to the proposed SELCHP DHN, should this become possible in the future. The PV system is the largest that the roof can accommodate. The development will further achieve 'zero carbon' through an offset payment in line with the London Plan and Southwark guidance. Overall carbon savings over the notional Part L baseline represents a 56% carbon reduction, well in exceedance of the 35% and 40% minimum reduction mandated by the GLA and Southwark, respectively.

289. As the development is unable to achieve the full 'Zero Carbon' target on site a contribution to the Borough's carbon offset fund will be required. The domestic elements carbon shortfall per annum amounts to £217,725, with the non-domestic element of the scheme resulting in a shortfall contribution of £95,102. The overall contribution to be secured in the S106 Agreement is £312,827. The S106 Agreement will also include the obligation of requiring the development to be constructed in accordance with the Energy and Sustainability Statement submitted with this application.

Overheating

290. London Plan Policy SI4 and Policy P68 of the NSP set out the cooling hierarchy that should be followed when developing a cooling strategy for new buildings. The six-step hierarchy is as follows:

- Minimise internal heat generation through energy efficient design; then
- Reduce the amount of heat entering the building through the orientation, shading, albedo, fenestration, insulation and green roofs and walls; then
- Manage the heat within the building through exposed internal thermal mass and high ceilings; then
- Use passive ventilation; then
- Use mechanical ventilation; then
- Use active cooling systems (ensuring they are the lowest carbon options).

291. The Acoustics Ventilation and Overheating – Residential Design Guide provides guidance regarding noise and overheating. It is stated that where façades fall within the high and medium risk categories, habitable rooms should be designed so as to avoid the reliance on openable windows to satisfy overheating targets. This may be achieved by use of solar rated glazing, black out blinds, or through fenestration design.
292. The results of the overheating assessment undertaken for this development conclude that the passive measures assessed to reduce the overheating risk on the development, specifically the Co-living units, were insufficient to reduce the overheating risk within the apartments to acceptable levels when assessed against CIBSE TM59. This was mainly due to the high performing building fabric selected for the development, air tightness of the building and the windows being unable to open, such that the lack of airflow in the apartment led to concerns that the building has potential to overheat in hot periods.
293. Given the results of the assessment outlined above, the option to serve the co-living apartments via a Hybrid Variable Refrigerant Flow (H-VRF) system is proposed to reduce the overheating issues and provide a thermally comfortable space for its users. The proposed system is highly energy efficient achieving average seasonal efficiencies (SEER) of up to 649% and unlike other VRV/VRF systems, the H-VRF system does not require refrigerant leak detection within the apartments as the final run to the heating / cooling coils uses water as a medium.
294. This proposal relies on the MVHR ventilation unit to overcome much of the overheating and has an inbuilt summer overheating boost mode. During the hottest months, where temperature exceeds 26°C, the H-VRF system will switch from normal general heating into cooling mode to assist the MVHR to bring the temperatures below 26°C. The strategy is to limit the end users use of the cooling function of the H-VRF system via the main controllers, this will limit the temperature set-point within the room to ensure that the cooling function is only active when the temperature exceeds 26°C. Although cooling is not implemented in most residential developments, the constraints of this building i.e. acoustics, high performance fabric and non-openable windows, it is deemed that providing a trim cooling system that would operate during warm spells during the summer only is a requirement to provide a thermally comfortable environment.

Whole life cycle and carbon capture

295. 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.
296. The submitted WCLA follows the guidance outlined in EN 1578:2011. Calculations have been provided via One Click LCA's 'LCA for BREEAM UK' Tool. The purpose of the BREEAM tool is to evaluate the whole life cycle carbon emissions of the development and make design decisions based on carbon data in order to reduce the life cycle carbon emissions of the building.
297. The results show that the Structure, including such materials as concrete and ferrous metals such as steel and reinforcement bars are the biggest contributors to the building's whole life global warming score, cumulatively contributing to 92.53% of the total buildings carbon emissions. Actions that have been identified within the WCLA to help reduce the impact of the development in each of the life cycle stages are encouraging.
298. A condition is attached to the decision notice requiring an updated Whole Life-Cycle (WLC) Carbon Assessment to demonstrate compliance with Part F of Policy SI 2 - Minimising greenhouse gas emissions of the London Plan 2021. The final wording of the condition will be agreed with the GLA during the Stage 2 process post committee.

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. The submitted Circular Economy Statement demonstrates the sustainability measures incorporated into the design of the development, and outlines the adoption of circular economy principles throughout the design, construction and operation of the proposed development. Through the incorporation of fundamental sustainability principles, the proposed development will:
- Minimise embodied carbon;
 - Operate with a circular economy;
 - Maximising the value extracted from materials;
 - Prioritising the reuse and recycling of materials;
 - Minimise the quantities of other resources used;
 - Specify and source materials and other resources responsibly and sustainably;
 - Manage demolition waste
 - Manage excavation waste
 - Manage construction waste
 - Manage municipal waste

301. A planning condition is to be imposed which will require that a Circular Economy Statement is to be agreed in writing by the Council prior to commencement of any works on site. Additionally, a special condition is to be imposed on the decision notice that requires a post completion circular economy report no later than three months following substantial completion of the final residential unit. This report will set out the predicted and actual performance against all numerical targets in the relevant Planning Stage Circular Economy Statement and shall be submitted to and approved in writing by the Local Planning Authority.
302. A post construction monitoring report is also secured by condition and this is included on the draft decision notice.

BREEAM

303. Southwark Plan Policy P69 requires developments to achieve a BREEAM rating of 'Excellent' for non-residential development and non-self-contained residential development over 500 sqm. A Pre-Assessment BREEAM has been undertaken and has considered the existing nature of the development site, along with the current development proposals and proposed building layout, and the results have demonstrated that the development being able to potentially achieve the minimum standards of the targeted 'Excellent' rating of 73.33%.
304. A planning condition is recommended to secure an independently verified BREEAM report demonstrating that these target ratings would be achieved through the detailed and technical design stages.

Water efficiency

305. For the residential aspect of the development, the applicant's Application Form confirms that the dwellings would have a maximum indoor water consumption of 101 litres per person per day, in line with the optional standard in Part G of the Building Regulations. This will be achieved through the incorporation of low flow fixtures and fitting within the commercial and residential parts of the development to ensure water usage is minimised as possible. Therefore, the development complies with Policy S15 of the London Plan 2021.

Digital connectivity infrastructure

306. 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 S16 (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.

307. A condition is attached to the decision notice that requires detailed plans to be submitted to and approved in writing by the Local Planning Authority demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development. This is in line with the requirements of Policy SI6 of the London Plan 2021.

PLANNING OBLIGATIONS (Section 106 Undertaking or Agreement)

308. London Plan Policy DF1 and Southwark Plan Policy IP3 advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. These policies are to be reinforced by the Section 106 Planning Obligations 2015 SPD, which sets out in detail the type of development that qualifies for planning obligations. The NPPF echoes the Community Infrastructure Levy Regulation 122 which requires obligations to be:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fairly and reasonably related in scale and kind to the development

309. Following the adoption of Southwark’s Community Infrastructure Levy (SCIL) on 1 April 2015, much of the historical toolkit obligations such as Education and Strategic Transport have been replaced by SCIL. Only defined site specific mitigation that meets the tests in Regulation 122 can be given weight.

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

Table: Section 106 Financial Obligations

Planning obligation	Mitigation	Applicant’s position
Local Economy and Workspace		
Employment and Enterprise	<p>This development would be expected to deliver 42 sustained jobs to unemployed Southwark residents, 42 short courses, and take on 10 construction industry apprentices during the construction phase, or meet the Employment and Training Contribution.</p> <p>The maximum Employment and Training Contribution is £201,900 (£180,600 against sustained jobs, £6,300 against short courses,</p>	Agreed

	and £15,000 against construction industry apprenticeships).	
Employment skills and business	<p>An employment, skills and business support plan is to be provided for this development. The plan should include:</p> <ol style="list-style-type: none"> 1. Methodology for delivering the following: <ol style="list-style-type: none"> a. Identified 'construction workplace coordinator' role(s) responsible for on-site job brokerage through the supply chain and coordination with local skills and employment agencies; b. Pre-employment information advice and guidance; c. Skills development, pre and post-employment; d. Flexible financial support for training, personal protective equipment, travel costs etc; e. On-going support in the workplace; f. Facilitation of wider benefits, including schools engagement, work experience etc. 2. Targets for construction skills and employment outputs, including apprenticeships, that meet the expected obligations; 3. A mechanism for delivery of apprenticeships to be offered in the construction of the development; 4. Local supply chain activity - we would expect methodologies with KPIs agreed to: <ol style="list-style-type: none"> a. provide support to local SMEs to be fit to compete for supply chain opportunities; b. develop links between lead contractors, sub-contractors and local SMEs; c. work with lead contractors and sub-contractors to open up their supply chains, and exploration as to where contract packages can be broken up and promote suitable opportunities locally. 	Agreed
Affordable workspace	10% affordable workspace to be secured	Agreed
Living wage	London living wage – best endeavours	Agreed

Housing and Viability		
Affordable housing	<ul style="list-style-type: none"> • 36.55% by habitable room (26.28% social rent; 10.27% intermediate) • Monitoring of Affordable housing £6,220.45 (£132.35 per unit) 	Agreed
Wheelchair Units	Secure 29 Co-living units and 7 conventional residential units as wheelchair accessible	Agreed
Management Plan	Management, operation and promotion strategy to be submitted and agreed prior to occupation.	Agreed
Transport and Highways		
Construction Management	<ul style="list-style-type: none"> • A detailed Construction Management Plan (CMP) and a £40 per unit (£5,640) contribution for Construction Management within the OKR AAP area. This is for the council to manage cumulative impacts on the highways and environment. 	Agreed
Southwark Highways s.278	<ul style="list-style-type: none"> • Repave the footways including new kerbing fronting the development on Hatcham Road, Penarth Street and Ormside Street using materials in accordance with Southwark's Streetscape Design Manual (SSDM). Remove any existing bollards from the footways. • Rebuild footway at two redundant vehicle entrances and double width entrance to two sets of roller shutter doors on Hatcham Road. • Rebuild footway outside 21 Hatcham Road and provide appropriate transition kerbing to retain existing vehicular access to neighbouring property. • Rebuild footway to match adjacent kerb height at flush area fronting development on Ormside Street. • Construct vehicle crossovers at entrance / exit to service yard on Ormside Street and Hatcham Road in accordance with SSDM standards. • Consider adjusting location of sinusoidal speed hump adjacent to proposed service yard entrance on Ormside Street. 	Agreed

	<ul style="list-style-type: none"> • Construct vehicle crossover for loading bay on Hatcham Road in accordance with SSDM standards. • Provide access arrangements such as a dropped kerb construction to accommodate refuse collection from bin stores at each of the three locations. • Upgrade speed cushions on Penarth Street to a sinusoidal speed hump. • A dropped kerb with tactile paving should be provided at the corner of Hatcham Road and Penarth Street or, if already installed by neighbouring development, any necessary renewal or repairs will be required. • Upgrade street lighting to current LBS standards Please contact George Livingstone at George.Livingstone@southwark.gov.uk for further details. Investigate the possibility of providing lamp columns mounted to the building in order to improve effective footway widths. • Install tree pits to three existing street trees on Hatcham Road and one on Penarth Street in accordance with current SSDM standards. • Refresh road markings following kerb installation. • Rectify any damaged footways, kerbs, inspection covers and street furniture due to the construction of the development. • It should be noted there may need to be changes to the parking bay layout in order to provide adequate turning space for vehicles using the service yard and loading bay if the CPZ is introduced. The applicant will be required to promote the relevant amendments to the Traffic Regulation Orders, road markings and signage. 	
TfL Obligations	<p>TfL requested financial obligations</p> <ul style="list-style-type: none"> • Bus contribution of £379,800 (based on £2,700 per home) 	Agreed

	<ul style="list-style-type: none"> TfL Cycle Hire Docking Station Contribution of £7,050 (based on £50 per home) along with free membership 	
TfL s.278	<ul style="list-style-type: none"> The delivery of the OKR Healthy Streets scheme via an appropriate design/layout Carriageway works Footway and junctions including any associated bus, walking and cycling infrastructure and other related works 	
Parking permit restriction	This development would be excluded from those eligible for car parking permits under any future CPZ operating in this locality.	Agreed
Car club membership	Three year membership to new residents to car clubs operating in the area.	Agreed
Delivery and Service Plan	DSP bond contribution of £14,900 (£100 per residential unit + £100 per 500 sqm of new commercial).	Agreed
Pavement	Public Realm and highway improvements to include footways paved with precast concrete paving slabs with 150mm wide silver grey granite natural stone kerbs.	Agreed
Energy, Sustainability and the Environment		
Futureproofing for connection to District Heat Network (DHN)	Prior to occupation, a CHP Energy Strategy must be approved setting out how the development will be designed and built so that it will be capable of connecting to the District CHP in the future.	Agreed
Carbon	<ul style="list-style-type: none"> An off-set payment of £312,827 Review and re-calculation of on-site savings following detailed design stage Be Seen Monitoring 	Agreed
Archaeology monitoring/supervision fund	£11,171 towards Archaeological monitoring	Agreed
Open Space	£211,513.20 contribution towards public open spaces within the OKROA	Agreed

Other obligations		
Architects	Securing Child Graddon Lewis Architects to deliver the building detailed design, unless otherwise agreed in writing	Agreed
Administration fee	Maximum contribution to cover the costs of monitoring these necessary planning obligations, calculated as 2% of total sum	Agreed

311. The S106 heads of terms agreed would satisfactorily mitigate against the adverse impacts of the proposed development.
312. In the event that a satisfactory legal agreement has not been entered into by 13th December 2023, it is recommended that the Director of Planning refuses planning permission, if appropriate, for the following reason:

“The proposal would, by failing to provide for appropriate planning obligations secured through the completion of a S106 agreement, not ensure adequate provision of affordable housing and mitigation against the adverse impacts of the development through projects or contributions which is contrary to Southwark Plan Policy IP3 (‘Community Infrastructure Levy (CIL) and Section 106 Planning Obligations’), Policy DF 1 Planning Obligations of the London Plan (2021) and the Southwark Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015)”.

Mayoral and Southwark Community Infrastructure Levy (CIL)

313. 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.
314. It is agreed that co-living is under Sui Generis; however, it is still classed as Residential within the Southwark CIL charging schedule, hence the development has been applied with Residential CIL rate. The site is located within Southwark CIL Zone 2 and MCIL2 Band 2 zone. Based on the existing floor areas provided in the agent’s CIL Form1 (GIA Info) dated 03-May-22 and proposed area in the Area Schedule (07.03.2022), the **gross amount of CIL is approximately £4,468,314.30 (pre-relief)** consisting £1,048,476.35 of Mayoral CIL and £3,419,837.95 of Borough CIL. Subject to the correct CIL forms being submitted on time, CIL Social Housing Relief can be claimed for a number of types of affordable housing. The resulting CIL amount is estimated to be **around £3,187,870.76 (net of relief)**. It should be noted that this is an estimate,

and the floor areas on approved drawings will need to be checked after planning permission has been obtained.

OTHER MATTERS

315. None

COMMUNITY INVOLVEMENT AND ENGAGEMENT

316. Southwark's Draft Statement of Community Involvement and Development Consultation Charter encourages consultation with local communities, especially developers seeking permission for 'Major/Large Scale' developments. The Charter is a guide setting out the consultation requirements to be carried out by developers for proposed development.
317. A Statement of Community Involvement by Cascade has been submitted along with the application. It was advised during pre-app discussions with Southwark officers that the most effective way to receive feedback from the local community regarding the development would be in the form of a website consultation page.
318. With the advice of Southwark officers, an online public webinar was held over three days (28th, 29th, 30th) in April 2021. Further public consultation was also held on an independent online website where the public was invited to view and comment on the scheme. In addition to the above, consultation invitation letters and emails were sent to stakeholders on 16th April 2021, with follow up emails sent to stakeholders for post consultation meetings on 4th May 2021.
319. Letters to political and community stakeholders were sent on 8th March 2021 with a meeting taking place with OKR Ward Councillors on 1st April to provide an overview of the proposals. The proposal was subject to scrutiny at the Community Review Panel on 7th June 2021. Finally, a post consultation stakeholder meeting with the adjoining business, Diespeker was undertaken on 16th June 2021. Given the above, it is considered that due to the extenuating circumstances of the Covid-19 pandemic, the efforts to source public feedback on the development proposals was acceptable in meeting the aims and objectives of Southwark's Draft Statement of Community Involvement and Development Consultation Charter

Human rights implications

320. This planning application engages certain human rights under the Human Rights Act 2008 (the HRA). The HRA prohibits unlawful interference by public bodies with conventions rights. The term 'engage' simply means that human rights may be affected or relevant.
321. This application has the legitimate aim of delivering a mixed-use development. The rights potentially engaged by this application, including the right to a fair trial and the

right to respect for private and family life are not considered to be unlawfully interfered with by this proposal.

CONCLUSION ON PLANNING ISSUES

322. The scheme would deliver major regeneration benefits, in an exemplary mixed use development including a significant contribution to the borough's housing stock, 36.7% affordable housing, an increase on existing employment floor space, and a significant improvement to the existing commercial space through a more efficient and useable floor plate. It is therefore considered that the development, in land use terms, is acceptable, and its contribution to the surrounding Old Kent Road Opportunity Area (OKROA) should be supported.
323. The delivery of social rent and intermediate units for the conventional residential aspect of the scheme is a very positive aspect of the proposals. A 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.
324. All residential and co-living units have access to large private amenity spaces in the form of inset or projecting balconies for the conventional residential element of the scheme. The co-living occupiers would benefit from two communal amenity spaces, and the conventional residential occupiers would benefit from a rooftop terrace at Block C for communal and children's play space.
325. The development will achieve 56% on-site carbon emissions, with the deficit being captured by way of a financial contribution.
326. The proposed development would reduce car dependency whilst significantly increasing cycle provision within the development. The increased width of the public footway along both Hatcham Road and Ormside Street is anticipated to significantly enhance the public realm and improve the pedestrian experience through comfort and circulation when entering, visiting or moving past the site. In addition, the alignment of the servicing road is compliant with the aims and objectives for the site contained within the OKR AAP.
327. 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.
328. The proposed development would deliver an exemplary co-located residential /industrial scheme helping to deliver both the employment and housing aspirations of the draft OKRD AAP. There would be some compromise to the residential quality of some of the co-location units in order to address agent of change principles but on balance this is considered to be acceptable in order to secure the long term delivery

of the AAP masterplan. The development would be of a high quality of architecture, and is considered to enhance the existing appearance of the subject site whilst referencing the surrounding context. The design has ensured that there would be depth and articulation to facades of the development which would reflect its industrial use and the character of the surrounding area.

329. It is therefore recommended that planning permission be granted subject to conditions, referral to the Mayor of London, and the agreement of a Section 106 Legal Agreement under the terms as set out above.

Consultation responses from external and statutory consultees

330. This application was subject to a round of statutory consultation in May/June 2022.

331. Greater London Authority has made the following comments:

The Deputy Mayor considers that the application does not yet comply with the London Plan for the reasons set out in paragraph 139 of the above-mentioned report; but that the possible remedies set out in that report could address these deficiencies.

“139. London Plan policies on land use, shared living accommodation, housing, urban design, transport, sustainable development and the environment are relevant to this application. The application does not fully comply with these policies, as summarised below:

- **Land Use Principles:** The principle of proposed co-location of light industrial/commercial uses with shared living accommodation and on-site affordable housing is broadly acceptable. However, matters in relation to equalities, design mitigation and transport impacts must be addressed.
- **Housing:** Comments in relation to the operational management plan, accommodation and amenity spaces must be addressed to demonstrate that the shared-living accommodation meets the qualitative assessment criteria set out in Policy H16. 47 affordable homes are proposed. GLA officers have concerns with the calculation proposed in terms of Fast Track Route eligibility and a viability assessment must be submitted.
- **Urban design:** The residential quality of the affordable housing block is unacceptable. The applicant should address the impacts of the tall building as required by Policy D9(C), along with comments in relation to the development layout, residential quality, the fire statement, inclusive design and agent of change. Details relating to these matters should then be secured.
- **Transport:** The applicant should address comments in relation to healthy streets, public transport, cycle and car parking and delivery and servicing. Contributions are sought towards bus service improvements (£2,700 per home), the delivery of the new ‘Surrey Canal’ London Overground station and the provision of a cycle hire docking station. Active travel measures, delivery and servicing, construction logistics and travel plans should be secured.
- **Sustainable development:** The development fails to achieve the minimum carbon savings required, which is unacceptable. The applicant is required to further refine the

energy strategy and submit further information to fully comply with London Plan requirements. Whole life-cycle carbon and circular economy assessments must be submitted. The applicant should also address comments in relation to sustainable drainage / flood risk and air quality.

• **Natural environment:** The applicant is required to address comments in relation to urban greening and green infrastructure, including the calculation of the Urban Greening Factor (UGF) score for the proposed development. Comments should also be addressed in relation to biodiversity net gain.”

Officer comment: All Stage 1 matters have been addressed with the applicant to cover the above matters as regards the submission of additional information and proposing the imposition of relevant conditions. Notwithstanding this, negotiations will continue with the GLA at the Stage 2 process post planning committee.

332. Transport for London comments were made within the GLA stage 1 letter (transport as above) and are as follows:

- The applicant should address comments in relation to healthy streets, public transport, cycle and car parking and delivery and servicing. Contributions are sought towards bus service improvements (£2,700 per home), the delivery of the new ‘Surrey Canal’ London Overground station and the provision of a cycle hire docking station. Active travel measures, delivery and servicing, construction logistics and travel plans should be secured.

Officer response: The comments from TfL are noted. Conditions relating to cycle parking and delivery and servicing plans have been secured in the decision notice attached, along with the requirement of EVC’s and the S106 Agreement will have an obligation where no resident will be able to apply for a parking permit.

The Council strongly disagrees with TfL that the development needs to provide a payment to the delivery of the New Bermondsey Overground Station. When the OKROA was outlined an agreement was in place whereby new residential development within Southwark would contribute £2,700 per residential unit towards the improvement of bus services in the area. As no such agreement was put in place to fund the New Bermondsey Overground Station development this contribution will not be sought for the S106 Agreement.

333. Metropolitan Police:

It is felt that the development could achieve the security requirements of Secured by design but communication with the Southeast designing Out Crime Unit at the earliest opportunity will be essential for this development, and maintaining contact throughout the development process...should this application proceed, it should be able to achieve the security requirements of secured by design. This will require the guidance of the secured by Design Homes 2019 and Secured by Design (SBD) Commercial 2105 guides. A two part condition to help achieve SBD standards is requested to be applied to cover SBD measures and its subsequent certification.

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

334. London Fire Brigade: No comments received.

335. Health and Safety Executive: Headline response from HSE to the LPA is 'concern'

HSE has assessed the application on the basis set out in the fire statement that the adopted fire safety design standard is British Standard 9991.

External walls

"1.3. Several elevation drawings (such as the 'proposed elevation - east - block B' drawing), detail PPC aluminium components of external walls. On 1st December 2022, Building Regulations were amended and now state 'Building work shall be carried out so that relevant metal composite material does not become part of an external wall, or specified attachment, of any building'.

1.4. It is unclear whether the proposed aluminium external wall components include the prohibited relevant metal composite materials. Any design changes necessary to ensure that only suitable materials are used in external walls may affect land use planning considerations such as the appearance of the building.

Means of escape and fire service access

1.5. The mezzanine drawing ('PROPOSED GA PLAN - LEVEL MZ MEZZANINE') shows that the block C1 cycle store is only accessible by lift. Consequently there is no means of fire service access to this store. A firefighting lift should not provide access to any floor without the provision of a firefighting stair also serving that floor because the staircase is the line of retreat should the lift fail. Similarly, as staircase C1 is the single staircase serving dwellings, it should not also serve ancillary accommodation such as the cycle store (which is likely to contain lithium-ion powered cycles). The reconfiguration of this area of the building to resolve these issues will affect land use planning considerations such as the layout and appearance of the development.

This response does not provide advice on any of the following:

- matters that are or will be subject to Building Regulations regardless of whether such matters have been provided as part of the application
- matters related to planning applications around major hazard sites, licensed explosive sites and pipelines
- applications for hazardous substances consent
- London Plan policy compliance.

Officer comment: Noted

336. Historic England (HE): no comments.

337. Natural England: No comments.

338. Environment Agency

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

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

339. Arqiva:

We have considered whether this amended development is likely to have an adverse effect on our operations and have concluded that we have no objections to this development.

340. Thames Water:

Waste Comments –was unable to obtain information from the applicant relating to the proposed waste water infrastructure required for the development. As such, TW has requested the imposition of a pre-commencement condition to ensure that surface water drainage can be properly accommodated and provided; that a development and infrastructure phasing plan is agreed prior to occupation; all surface water network upgrades required to accommodate the additional flows from the development have been completed.

Foul Water comments: no objection.

Informatives requested to be added to advise applicant/developer of Surface Water drainage sequential approach and that there are water mains crossing or close to the application site.

Officer comment: Comments noted and recommended conditions and informative included and attached, respectively to the accompanying decision notice.

341. NATS Safeguarding:

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS has no safeguarding objection to the proposal.

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

342. Civil Aviation Authority: No comments.

343. National Grid UK Transmission: No comments.

344. Network rail: No comments

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

345. N/A

REASONS FOR LATENESS

346. N/A

REASONS FOR URGENCY

347. N/A

BACKGROUND INFORMATION

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file 2408-C Application file 22/AP/1603 Southwark Local Development Framework and Development Plan Documents	Environment, Neighbourhoods & Growth Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 0207 525 1513 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Recommendation (draft decision notice)
Appendix 2	Relevant planning policy

Appendix 3	Planning history of the site and nearby sites
Appendix 4	Consultation undertaken
Appendix 5	Consultation responses received

AUDIT TRAIL

Lead Officer	Stephen Platts, Director of Planning and Growth	
Report Author	Paul Ricketts, Team Leader	
Version	Final	
Dated	June 2023	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director, Finance	No	No
Strategic Director, Environment, Neighbourhoods and Growth	No	No
Strategic Director, Housing	No	No
Date final report sent to Constitutional Team		2 June 2023

Appendix 1: Recommendation (draft decision notice)

Applicant Caddick Developments limited
Application Type Full Planning Application

Recommendation Grant subject to S106 Agreement

Case Number 22/AP/1603

Draft of Decision Notice

Planning Permission was **GRANTED** for the following development:

Demolition of existing buildings and construction of a mixed-use part 8, part 9, part 10 storey building comprising of 4,176 sqm of light industrial (Use Class E(g)(iii)), studio and office (Use Class E(g)(i) and (ii)) work spaces at ground and mezzanine floor levels with 283 co-living studios and supporting amenity facilities (Sui Generis Use) and 47 (36.7% affordable by habitable rooms) residential homes (Use Class C3) above, together with servicing arrangements, cycle parking, external amenity spaces, landscaping and associated works.

At: 18 – 22 PENARTH STREET, SE15, 1TX

In accordance with application received on 17/05/2022

2022

1 **Approved Plans**

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

PEN-CGL-Z0-00-DR-A-PL0001 SITE LOCATION PLAN

PEN-CGL-Z0-00-DR-A-PL0002 EXISTING PLAN - GROUND FLOOR

PEN-CGL-Z0-01-DR-A-PL0003 EXISTING PLAN - LEVEL 01

PEN-CGL-Z0-02-DR-A-PL0004 EXISTING PLAN - ROOF

PEN-CGL-Z0-00-DR-A-PL0005 EXISTING ELEVATION - NORTH and EAST

PEN-CGL-Z0-00-DR-A-PL0006 EXISTING ELEVATION - SOUTH and WEST

PEN-CGL-Z0-00-DR-A-PL0007 EXISTING SECTIONS

PEN-CGL-Z0-00-DR-A-PL00009 PROPOSED SITE PLAN - LEVEL 00 GROUND FLOOR

PEN-CGL-Z0-00-DR-A-PL0010 PROPOSED GA PLAN - LEVEL 00 GROUND FLOOR

PEN-CGL-Z0-MZ-DR-A-PL0011 PROPOSED GA PLAN - LEVEL MZ HALF MEZZANINE

PEN-CGL-Z0-MZ-DR-A-PL0012 PROPOSED GA PLAN - LEVEL MZ MEZZANINE
PEN-CGL-Z0-01-DR-A-PL0013 PROPOSED GA PLAN - LEVEL 01
PEN-CGL-Z0-02-DR-A-PL0014 PROPOSED GA PLAN - LEVEL 02
PEN-CGL-Z0-03-DR-A-PL0015 PROPOSED GA PLAN - LEVEL 03
PEN-CGL-Z0-04-DR-A-PL0016 PROPOSED GA PLAN - LEVEL 04
PEN-CGL-Z0-05-DR-A-PL0017 PROPOSED GA PLAN - LEVEL 05
PEN-CGL-Z0-06-DR-A-PL0018 PROPOSED GA PLAN - LEVEL 06
PEN-CGL-Z0-07-DR-A-PL0019 PROPOSED GA PLAN - LEVEL 07
PEN-CGL-Z0-08-DR-A-PL0020 PROPOSED GA PLAN - LEVEL 08
PEN-CGL-Z0-09-DR-A-PL0021 PROPOSED GA PLAN - LEVEL 09
PEN-CGL-Z0-01-DR-A-PL0030 FLAT TYPE PLANS - UNIT TYPE A1
PEN-CGL-Z0-01-DR-A-PL0031 FLAT TYPE PLANS - UNIT TYPE A2
PEN-CGL-Z0-01-DR-A-PL0032 FLAT TYPE PLANS - UNIT TYPE A3
PEN-CGL-Z0-01-DR-A-PL0033 FLAT TYPE PLANS - UNIT TYPE A4
PEN-CGL-Z0-01-DR-A-PL0034 FLAT TYPE PLANS - UNIT TYPE A5
PEN-CGL-Z0-09-DR-A-PL0040 PROPOSED GA BLOCK PLAN - LEVEL 00 - BLOCK A
PEN-CGL-Z0-09-DR-A-PL0041 PROPOSED GA BLOCK PLAN - MEZZANINE - BLOCK A
PEN-CGL-Z0-09-DR-A-PL0042 PROPOSED GA BLOCK PLAN - LEVEL 01 - BLOCK A
PEN-CGL-Z0-09-DR-A-PL0043 PROPOSED GA BLOCK PLAN - LEVEL 02 - BLOCK A
PEN-CGL-Z0-09-DR-A-PL0044 PROPOSED GA BLOCK PLAN - LEVEL 03 - BLOCK A
PEN-CGL-Z0-09-DR-A-PL0045 PROPOSED GA BLOCK PLAN - LEVEL 04 - BLOCK A
PEN-CGL-Z0-09-DR-A-PL0046 PROPOSED GA BLOCK PLAN - LEVEL 05 - BLOCK A
PEN-CGL-Z0-09-DR-A-PL0047 PROPOSED GA BLOCK PLAN - LEVEL 06 - BLOCK A
PEN-CGL-Z0-09-DR-A-PL0048 PROPOSED GA BLOCK PLAN - LEVEL 07 - BLOCK A
PEN-CGL-Z0-09-DR-A-PL0049 PROPOSED GA BLOCK PLAN - LEVEL 08 - BLOCK A
PEN-CGL-Z0-09-DR-A-PL0050 PROPOSED GA BLOCK PLAN - LEVEL00 - BLOCK B
PEN-CGL-Z0-09-DR-A-PL0051 PROPOSED GA BLOCK PLAN - MEZZANINE - BLOCK B
PEN-CGL-Z0-09-DR-A-PL0052 PROPOSED GA BLOCK PLAN - LEVEL01 - BLOCK B

PEN-CGL-Z0-09-DR-A-PL0053 PROPOSED GA BLOCK PLAN - LEVEL02 - BLOCK B
PEN-CGL-Z0-09-DR-A-PL0054 PROPOSED GA BLOCK PLAN - LEVEL03 - BLOCK B
PEN-CGL-Z0-09-DR-A-PL0055 PROPOSED GA BLOCK PLAN - LEVEL04 - BLOCK B
PEN-CGL-Z0-09-DR-A-PL0056 PROPOSED GA BLOCK PLAN - LEVEL05 - BLOCK B
PEN-CGL-Z0-09-DR-A-PL0057 PROPOSED GA BLOCK PLAN - LEVEL06 - BLOCK B
PEN-CGL-Z0-09-DR-A-PL0058 PROPOSED GA BLOCK PLAN - LEVEL07 - BLOCK B
PEN-CGL-Z0-09-DR-A-PL0059 PROPOSED GA BLOCK PLAN - LEVEL 08 - BLOCK B
PEN-CGL-Z0-09-DR-A-PL0060 PROPOSED GA BLOCK PLAN - LEVEL00 - BLOCK C
PEN-CGL-Z0-09-DR-A-PL0061 PROPOSED GA BLOCK PLAN - MEZZANINE - BLOCK C
PEN-CGL-Z0-09-DR-A-PL0062 PROPOSED GA BLOCK PLAN - LEVEL01 - BLOCK C
PEN-CGL-Z0-09-DR-A-PL0063 PROPOSED GA BLOCK PLAN - LEVEL02 - BLOCK C
PEN-CGL-Z0-09-DR-A-PL0064 PROPOSED GA BLOCK PLAN - LEVEL03 - BLOCK C
PEN-CGL-Z0-09-DR-A-PL0065 PROPOSED GA BLOCK PLAN - LEVEL04 - BLOCK C
PEN-CGL-Z0-09-DR-A-PL0066 PROPOSED GA BLOCK PLAN - LEVEL05 - BLOCK C
PEN-CGL-Z0-09-DR-A-PL0067 PROPOSED GA BLOCK PLAN - LEVEL06 - BLOCK C
PEN-CGL-Z0-09-DR-A-PL0068 PROPOSED GA BLOCK PLAN - LEVEL07 - BLOCK C
PEN-CGL-Z0-09-DR-A-PL0069 PROPOSED GA BLOCK PLAN - LEVEL 08 - BLOCK C
PEN-CGL-Z0-05-DR-A-PL0076 PROPOSED GA PLAN - BLOCK C - WHEELCHAIR
ADAPTABLE FLAT LOCATION
PEN-CGL-Z0-XX-DR-A-PL0100 PROPOSED ELEVATION- NORTH
PEN-CGL-Z0-XX-DR-A-PL0101 PROPOSED ELEVATION- NORTH - THROUGH LINK
BLOCK
PEN-CGL-Z0-XX-DR-A-PL0102 PROPOSED ELEVATION - BLOCKS A AND B – EAST
PEN-CGL-Z0-XX-DR-A-PL0103 PROPOSED ELEVATION - BLOCK C – EAST
PEN-CGL-Z0-XX-DR-A-PL0104 PROPOSED ELEVATION - BLOCK C – WEST
PEN-CGL-Z0-XX-DR-A-PL0105 PROPOSED ELEVATION - BLOCKS A AND B – WEST
PEN-CGL-Z0-XX-DR-A-PL0106 PROPOSED ELEVATION – SOUTH
PEN-CGL-Z0-XX-DR-A-PL0107 PROPOSED ELEVATION – SOUTH
PEN-CGL-Z0-XX-DR-A-PL0300 PROPOSED ELEVATION- NORTH - BLOCK A

PEN-CGL-Z0-XX-DR-A-PL0301 PROPOSED ELEVATION- NORTH - BLOCK B
PEN-CGL-Z0-XX-DR-A-PL0302 PROPOSED ELEVATION - EAST - BLOCK A
PEN-CGL-Z0-XX-DR-A-PL0303 PROPOSED ELEVATION - EAST - BLOCK B
PEN-CGL-Z0-XX-DR-A-PL0304 PROPOSED ELEVATION - EAST - BLOCK C
PEN-CGL-Z0-XX-DR-A-PL0305 PROPOSED ELEVATION - WEST- BLOCK C
PEN-CGL-Z0-XX-DR-A-PL0306 PROPOSED ELEVATION - WEST - BLOCK A
PEN-CGL-Z0-XX-DR-A-PL0307 PROPOSED ELEVATION - WEST - BLOCK B
PEN-CGL-Z0-ALL-DR-A-PL0308 PROPOSED ELEVATION - SOUTH - BLOCK A
PEN-CGL-Z0-ALL-DR-A-PL0309 PROPOSED ELEVATION- NORTH - BLOCK C
PEN-CGL-Z0-XX-DR-A-PL0310 PROPOSED ELEVATION - SOUTH - BLOCK B&C
PEN-CGL-Z0-XX-DR-A-PL0500 GA SECTION - EAST WEST – AA
PEN-CGL-Z0-XX-DR-A-PL0501 GA SECTION - EAST WEST – BB
PEN-CGL-Z0-XX-DR-A-PL0502 GA SECTION - EAST WEST – CC
PEN-CGL-Z0-XX-DR-A-PL0503 GA SECTION - NORTH SOUTH - DD & EE
PEN-CGL-Z0-XX-DR-A-PL0504 GA SECTION - NORTH SOUTH - DIESPEKER BOUNDARY WALL

Reason:

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

Permission is subject to the following Time Limits:

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

Reason:

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

Pre-commencement condition(s) - the details required to be submitted for approval by the condition(s) listed below must be submitted to and approved by the

council before any work in connection with implementing this permission is commenced.

3 Archaeological Evaluation

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

Reason:

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

4 Archaeological Mitigation

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

Reason:

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

5 Archaeological Foundation Design

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

Reason:

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

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

6 Construction Environmental Management Plan (CEMP)

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

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

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

- o Southwark Council's Technical Guide for Demolition & Construction at <http://www.southwark.gov.uk/construction>
- o Section 61 of Control of Pollution Act 1974,
- o The London Mayors Supplementary Planning Guidance 'The Control of Dust and Emissions During Construction and Demolition',
- o The Institute of Air Quality Management's 'Guidance on the Assessment of Dust from Demolition and Construction' and 'Guidance on Air Quality Monitoring in the Vicinity of Demolition and Construction Sites',
- o BS 5228-1:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites. Noise',

- o BS 5228-2:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites. Vibration'
- o BS 7385-2:1993 Evaluation and measurement for vibration in buildings. Guide to damage levels from ground-borne vibration,
- o BS 6472-1:2008 'Guide to evaluation of human exposure to vibration in buildings - vibration sources other than blasting,
- o Relevant Stage emission standards to comply with Non-Road Mobile Machinery (Emission of Gaseous and Particulate Pollutants) Regulations 1999 as amended & NRMM London emission standards <http://nrmm.london/>

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

Reason

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

7 **Site Contamination**

Prior to the commencement of any development, excluding demolition:

- a) A detailed remediation and/or mitigation strategy shall be prepared and submitted to the Local Planning Authority for approval in writing. The strategy shall detail all proposed actions to be taken to bring the site to a condition suitable for the intended use together with any monitoring or maintenance requirements. The scheme shall also ensure that as a minimum, the site should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. The approved remediation scheme (if one is required) shall be carried out and implemented as part of the development.
- b) Following the completion of the works and measures identified in the approved remediation strategy for that phase, a verification report providing evidence that all works required by the remediation strategy have been completed, together with any future monitoring or maintenance requirements shall be submitted to and approved in writing by the Local Planning Authority.
- c) In the event that potential contamination is found at any time when carrying out the approved development that was not previously identified, it shall be reported in writing immediately to the Local Planning Authority, and a scheme of investigation and risk assessment, a remediation strategy and verification report (if required) shall be submitted to the Local Planning Authority for approval in writing, in accordance with a-d above.

Reason:

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to

workers, neighbours and other off-site receptors in accordance with the Southwark Plan 2022 Policy P56 (Protection of amenity); Policy P64 (Contaminated land and hazardous substances), and the National Planning Policy Framework 2021.

8 **Drainage**

Prior to commencement of groundworks (excluding site investigations and demolition), the applicant must submit a final detailed drainage design including drawings, supporting calculations and Sustainable Drainage Proforma to the Lead Local Flood Authority for review and approval, aligned with the Flood Risk Assessment (October 2022) and associated drawings. It should be demonstrated that the proposed discharge rates are as close to the greenfield rate as is feasible. Consent from Thames Water should be provided for discharge into their network. A detailed management plan confirming routine maintenance tasks for all drainage components must also be submitted to demonstrate how the drainage system is to be maintained for the lifetime of the development.

Reason:

To prevent the risk of flooding to and from the site in accordance with relevant policy requirements including but not limited to London Plan Policy SI 13, its associated Sustainable Design and Construction SPG, the Non-Statutory Technical Standards for Sustainable Drainage Systems and Southwark's Local Plan Policy P68

9 **Access for Fire Appliances**

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

Reason:

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

10 **Circular Economy Statement**

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

Reason:

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

11 Piling Risk Assessment

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

Reason:

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

- 12 Prior to the commencement of development, an updated Whole Life-Cycle Carbon Assessment shall be submitted to the Local Planning Authority. The updated document shall use the planning stage tab of the GLA's Whole Life [1]Cycle Carbon Assessment template, should be completed accurately, and in its entirety in line with the GLA's Whole Life-Cycle Carbon Assessment guidance. It should be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk. Confirmation of submission to the GLA shall be submitted to, and approved in writing by, the Local Planning Authority, prior to commencement.

Reason:

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

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

- 13 Prior to the commencement of development above slab level a scheme shall be submitted to and approved in writing by the local Planning Authority to ensure that the windows to the seventy co-living studios on the western elevation of Block A shall remain fixed shut until the neighbouring Diespeker site has been redeveloped unless otherwise agreed in writing with the Council or such time as the adjoining premises at 132-136 Ormside Street are redeveloped. The scheme shall be implemented and maintained thereafter in accordance with such approval.

Reason:

To ensure that the agent of change principle is implemented and that the residential environment meets an acceptable standard and existing adjoining commercial premises are not adversely impacted in accordance with Policies D13 (Agent of

Change) and E7(D) (Industrial Intensification, co-location and substitution) of the London Plan 2021

14 **Hard and Soft Landscaping**

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

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

Reason:

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

15 **Biodiverse Roofs**

Before any biodiverse roofs are installed:

- (i) details of the biodiversity (green/brown) roof(s) for that phase shall be submitted to and approved in writing by the Local Planning Authority. The biodiversity (green/brown) roof(s) shall be:
 - biodiversity based with extensive substrate base (depth 80-150mm);
 - laid out in accordance with agreed plans; and
 - planted/seeded with an agreed mix of species within the first planting season following the practical completion of the building works (focused on wildflower planting, and no more than a maximum of 25% sedum coverage).

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

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

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

Reason:

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

16 Landscape Management Plan

Before any above grade work hereby authorised begins, a landscape management plan, including long term design objectives, management responsibilities and maintenance schedules for all landscape areas, other than small, privately owned, domestic gardens, shall be submitted to and approved by the Local Planning Authority.

Details of an irrigation schedule shall be provided for all trees to ensure successful establishment. For stem girths of up to 20cm the schedule shall be a minimum of three years, and five years for stem girths greater than 20cm. Trees in containers shall specify a minimum volume of 4.5 cubic metres of exploitable soil per tree. The landscape management plan shall be carried out as approved and any subsequent variations shall be agreed in writing by the local planning authority.

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

Reason:

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

17 Swift Bricks/Bat Bricks

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

No less than 24 swift bricks on the eastern elevation and 4 bat bricks/tubes shall be provided and the details shall include the exact location, specification and design of the habitats. The

bricks shall be installed within the development prior to the first occupation of the building to which they form part or the first use of the space in which they are contained.

Reason:

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

18 Secure By Design

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

Reason:

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

19 Materials Schedule and On-Site Presentation of Samples

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

Reason:

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

20 Design Mock-ups

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

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

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

Reason:

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

21 Play Spaces

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

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

Reason:

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

22 Wheelchair housing

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

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

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

M4(3)(2)(a) 'wheelchair adaptable'

Reason:

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

23 Digital Connectivity

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

Reason:

To comply with SI 6 of the London Plan 2021.

24 Lifts

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

Reason:

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

25 Sprinkler System

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

Reason:

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

26 Precautionary Bat Surveys

If more than two seasons pass between the most recent bat survey and the commencement of demolition and/or tree works, an update bat survey must be undertaken immediately prior to demolition or tree works by a licensed bat worker. Evidence that the survey has been undertaken

shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of demolition and/or tree works.

Reason:

To ensure compliance with the Habitats Regulations and the Wildlife & Countryside Act 1981 (as amended).

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

27 Car Free Marketing

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

Reason:

To ensure compliance with P54 of the Southwark Plan 2022.

28 Signage

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

Reason:

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

29 Circular Economy Post Completion Report

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

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

Reason:

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

30 **Whole Life Cycle**

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

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

Reason:

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

31 **Noise breakout from Commercial use**

Prior to occupation, building envelope sound insulation of any commercial use shall be so adapted as necessary in light of the intended commercial use in order to provide reasonable resistance to the transmission of sound sufficient to ensure that noise due to the commercial premises does not exceed NR40 when measured as an LAeq across any 5 minute period at any location 3m from the commercial facade.

Reason:

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

32 **Electric Vehicle Charging Points**

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

Reason:

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

33 **Cycle Storage Facilities**

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

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

Reason:

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

34 **Lighting Plan**

Prior to the commencement of the use hereby granted permission, a Lighting Plan shall be submitted to and approved by the Local Planning Authority. The recommended lighting specification using LED's (at 3 lux) because they have little UV. The spectrum recommended is 80% amber and 20% white with a clear view, no UV, horizontal light spread ideally less than 70° and a timer.

Reason:

To ensure compliance with the Habitats Regulations and the Wildlife & Countryside Act 1981 (as amended).

35 **Internal Noise Levels**

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

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

Living and Dining rooms- 35dB LAeq T †

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

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

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

Reason:

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

36 Vertical Sound Transmission

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

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

Reason:

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

37 Refuse Storage Facilities

Before the first occupation of any part of the development hereby approved, the refuse storage arrangements shown on the approved drawings shall be provided and made available for use by the occupiers. The refuse storage facilities shall thereafter be retained and the space used for no other purpose.

Reason:

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

38 Sustainable Drainage Scheme Evidence

No building hereby permitted shall be occupied until evidence (photographs and installation contracts) is submitted to demonstrate that the sustainable drainage scheme for the site has

been completed in accordance with the submitted details. The sustainable drainage scheme shall be managed and maintained thereafter in accordance with the agreed management and maintenance plan for all of the proposed drainage components.

Reason:

To comply with the Non-Statutory Technical Standards for Sustainable Drainage Systems, the National Planning Policy Framework (Paragraph 103), the London Plan (Policies SI 12 and SI 13) along with associated guidance to these policies and Southwark's Local Plan Policy P68.

39 Water Network Infrastructure

No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan

Reason:

The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development.

40 Before any work above grade hereby approved begins on any phase of development, full particulars, details and specification of a scheme for the fit out of the commercial premises to an appropriate level for Class E(g)(i, ii, iii) use shall be submitted to and approved by the Local Planning Authority and the development shall not be carried out otherwise than in accordance with any approval given. This should include details of the mechanical and electrical fit out of the units, showing lighting, heating and cooling provision, the provision of kitchen and toilet facilities, the provision of a three phase electricity supply and fire suppression sprinkler system as well as the fit out of external doors and windows. The development shall not be carried out otherwise than in accordance with any approval given, and practical completion of the Class E(g)(i, ii, iii) fit out for each phase shall be at the same time, or before the first occupation of the residential component of the same phase.

Reason:

In granting this permission the Local Planning Authority has had regard to the special circumstances of this case in accordance with Strategic Policy 1.2 Strategic and local preferred industrial locations of The Core Strategy 2011 and Saved Policy 3.2 Protection of Amenity of the Southwark Plan 2007 and the National Planning Policy Framework 2021

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

41 Air Quality

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

Reason:

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

42 Enhanced Horizontal Sound Transmission

All party walls, floors and ceilings between the commercial premises and residential dwellings shall be designed to achieve a minimum weighted standardized level difference 55dB DnTw+Ctr. Pre-occupation testing of the separating partitions shall be undertaken for airborne sound insulation in accordance with the methodology of ISO 16283-1:2014. Details of the specification of the partition together with full results of the sound transmission testing shall be submitted to the Local Planning Authority for written approval prior to the use commencing and once approved the partition shall be permanently maintained thereafter.

Reason:

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

43 Plant Noise

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

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

Reason:

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

44 **External noise levels in amenity areas**

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

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

Reason:

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

45 **Servicing Hours**

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

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

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

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

06:30 - 18:00 Monday to Friday; and

07:00 - 16:00 on Saturday and Bank Holidays.

Reason:

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

46 **External Lighting**

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

Reason:

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

47 Fire Safety Strategy

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

Reason:

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

48 Energy Efficiency

The development hereby permitted shall be constructed in accordance with the approved Energy and Sustainability Statement (prepared by CDI ref. P03) dated 07.01.22. All measures and technologies shall remain for as long as the development is occupied, unless as otherwise agreed in writing.

Reason:

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

49 Roof Plant and Other Roof Structures

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

Reason:

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

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

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

Reason:

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

51 Restriction of Instatement of Appurtenances

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

Reason:

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

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

52 Archaeological Reporting

Within one year of the completion of the archaeological work on site, an assessment report detailing the proposals for the off-site analyses and post-excavation works, including publication of the site and preparation for deposition of the archive, shall be submitted to and approved in writing by the Local Planning Authority, and the works detailed in the assessment report shall not be carried out otherwise than in accordance with any such approval given. This document should include full details of measures to ensure the preservation in situ of archaeological remains, should they be required, details of monitoring and measures to recover such remains should monitoring indicate failure of preservation in situ measures. The assessment report shall provide evidence of the applicant's commitment to finance and resource these works to their completion.

Reason:

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

53 BREEAM

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

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

Reason:

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

Informative notes to the applicant relating to the proposed development

THAMES WATER

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

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

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

Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

ENVIRONMENT AGENCY

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

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2016
- The Waste (England and Wales) Regulations 2011

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

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

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

Appendix 2: Planning Policy

National Planning Policy Framework

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

The following chapters are relevant:

Chapter 2 Achieving sustainable development

Chapter 6 Building a strong, competitive economy

Chapter 8 Promoting healthy and safe communities

Chapter 9 Promoting sustainable transport

Chapter 11 Making effective use of land

Chapter 12 Achieving well-designed places

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

Chapter 16 Conserving and enhancing the historic environment

New London Plan 2021 Policies

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

The relevant policies are:

GG1 Building strong and inclusive communities

GG2 Making the best use of land

GG3 Creating a healthy city

GG5 Growing a good economy

GG6 Increasing efficiency and resilience

Policy SD1 Opportunity Areas

Policy SD6 Town centres and high streets

Policy SD7 Town centres: development principles and Development Plan Documents

Policy SD8 Town centre network

Policy SD9 Town centres: Local partnerships and implementation

Policy SD10 Strategic and local regeneration

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

Policy D2 Infrastructure requirements for sustainable densities

Policy D3 Optimising site capacity through the design-led approach

Policy D4 Delivering good design

Policy D5 Inclusive design

Policy D7 Accessible housing

Policy D8 Public realm

Policy D9 Tall buildings

Policy D11 Safety, security and resilience to emergency

Policy D12 Fire safety

Policy D14 Noise

Policy H1 Increasing housing supply

Policy H4 Delivering affordable housing

Policy H5 Threshold approach to applications

Policy H6 Affordable housing tenure

Policy H7 Monitoring of affordable housing

Policy H10 Housing size mix

Policy H16 Large-scale purpose-built shared living

Policy S1 Developing London's social infrastructure

Policy E2 Providing suitable business space

Policy E11 Skills and opportunities for all

Policy HC1 Heritage conservation and growth

Policy HC2 World Heritage Sites

Policy HC3 Strategic and Local Views

Policy HC4 London View Management Framework

Policy G1 Green infrastructure

Policy G5 Urban greening

Policy G6 Biodiversity and access to nature

Policy G7 Trees and woodlands

Policy SI 1 Improving air quality

Policy SI 2 Minimising greenhouse gas emissions

Policy SI 3 Energy infrastructure

Policy SI 4 Managing heat risk

Policy SI 5 Water infrastructure

Policy SI 6 Digital connectivity infrastructure

Policy SI 7 Reducing waste and supporting the circular economy

Policy SI 8 Waste capacity and net waste self-sufficiency

Policy SI 12 Flood risk management

Policy SI 13 Sustainable drainage

Policy T1 Strategic approach to transport

Policy T2 Healthy Streets

Policy T3 Transport capacity, connectivity and safeguarding

Policy T4 Assessing and mitigating transport impacts

Policy T5 Cycling

Policy T6 Car parking

Policy T6.5 Non-residential disabled persons parking

Policy T7 Deliveries, servicing and construction

Policy T9 Funding transport infrastructure through planning

Southwark Plan 2022

ST1 Southwark's Development targets

ST2 Southwark's Places

SP1a Southwark's development targets

SP1b Southwark's places

SP1 Quality affordable homes

SP3 Great start in life

SP4 Green and inclusive economy

SP5 Thriving neighbourhoods and tackling health equalities

SP6 Climate Change

AV.13 Old Kent Road Area Vision

P1 Social rented and intermediate housing

P2 New family homes

P7 Wheelchair accessible and adaptable housing

P12 Design of places

P13 Design quality

P16 Designing out crime

P17 Tall buildings

P18 Efficient use of land

P20 Conservation areas

P21 Conservation of the historic environment and natural heritage

P22 Borough views

P23 Archaeology

P28 Access to employment and training

P29 Strategic protected industrial land

P30 Office and business development

P31 Affordable workspace

P44 Broadband and digital infrastructure
P45 Healthy developments
P47 Community uses
P49 Public transport
P50 Highways impacts
P51 Walking
P53 Cycling
P54 Car Parking
P55 Parking standards for disabled people and the mobility impaired
P56 Protection of amenity
P57 Open space
P59 Green infrastructure
P60 Biodiversity
P61 Trees
P62 Reducing waste
P64 Contaminated land and hazardous substances
P65 Improving air quality
P66 Reducing noise pollution and enhancing soundscapes
P67 Reducing water use
P68 Reducing flood risk
P69 Sustainability standards
P70 Energy
IP2 Transport infrastructure
IP3 Community infrastructure levy and section 106 planning obligations.

Mayors SPD/SPGs

Sustainable Design and Construction (April 2014)

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

London View Management Framework (March 2012)

Planning for Equality and Diversity in London (October 2007)

Southwark SPDs/SPGs

Design and Access Statements (2007)

Residential Design Standards (2011 with 2015 update)

S106 and CIL (2015)

S106 and CIL Addendum (2017)

Sustainability Assessments (2007)

Sustainable Design and Construction (2009)

Sustainable Transport (2009)

Southwark AAP's

Draft Old Kent Road Area Action Plan (December 2020)

Appendix 3: Relevant Planning History

Relevant Site History

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

Relevant History of Adjoining Sites

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

840 Old Kent Road, London SE15 1NQ

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

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

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

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

Tustin Estate Land Bounded By Manor Grove Ilderton Road Hillbeck Close Old Kent Road, London SE15 1EF

Hybrid application comprising a full planning application for Phase 1 comprising the demolition of Hillbeck Close, Ullswater House and garages at Manor Grove and the erection of four buildings at 2/3-storeys (D1 and D2), 5/9-storeys (C) and 7/13-storeys (G1) providing 167 homes (Class C3) with associated parking, public realm, open

spaces, landscaping and ancillary infrastructure; and the refurbishment of properties at Manor Grove.

Outline planning permission (all matters reserved except for access) for phases 2, 3 and 4 comprising the demolition of Bowness House, Pilgrims Way Primary School, Kentmere House and Heversham House and the erection of 12 buildings (A, B, E1, E2, E3, E4, F1, F2, G2, H, J and Pilgrims Way Primary School) ranging in height from 2 to 21 storeys to provide up to 57,786 sqm of floorspace (GEA), comprising up to 523 affordable and market homes (Class C3), up to 3,452 sqm (GEA) of flexible commercial floorspace (Class E, F1 and sui generis) and up to 2,214 sqm (GEA) of educational floorspace (Class F1) including temporary space for the children's centre, with associated parking, public realm, open spaces (including MUGA), landscaping and ancillary infrastructure. Providing a total of 690 homes (Use Class C3) and 5,666 sqm (GEA) of non-residential floorspace (Use Classes E, F1 and sui generis).

Daisy Business Park 19-35 Sylvan Grove London SE15

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

313-349 Ilderton Road London, SE15

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

301-303 Ilderton Road London, SE15

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

Ilderton Wharf, 1-7 Rollins Street London, SE15

Planning permission (21/AP/4757) for Demolition of existing buildings and erection of a mixed use development comprising a building of part 9, 23 and 25 storeys above ground to provide a replacement builders merchants with associated office, trade counter sales area, showroom and external storage/racking, a commercial unit fronting Ilderton Road (Use Class E), 163 residential apartments (Use Class C3) and other associated infrastructure.

Appendix 4: Consultation undertaken

Site notice date: 14.06.2022

Press notice date: 09.06.3022

Case officer site visit date: 14.06.2022

Neighbour consultation letters sent: 26.05.2022

Internal services consulted

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

Statutory and non-statutory organisations

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

Neighbour and local groups consulted

Name/Address

**Peri
od** **Date
Printed**

Reply by

7 Gerards Close London Southwark SE16 3DF	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
5 Gerards Close London Southwark SE16 3DF	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
3 Gerards Close London Southwark SE16 3DF	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 19 Warlingham House Varcoe Road London Southw	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 12 Warlingham House Varcoe Road London Southw	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
3 Manor Grove London Southwark SE15 1EQ	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
13 Manor Grove London Southwark SE15 1EQ	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
57 Manor Grove London Southwark SE15 1EH	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
214 Ilderton Road London Southwark SE15 1NT	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
180 Ilderton Road London Southwark SE15 1NT	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
5 Manor Grove London Southwark SE15 1EQ	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
127-135 Ormside Street London Southwark SE15 1TF	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
137 Ormside Street London Southwark SE15 1TF	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023

Apartment 1 90 Varcoe Road London Southwark SE16 3	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 21B The Penarth Centre Penarth Street London	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 2 221 Ilderton Road London Southwark SE15 1NS	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
24B Manor Grove London Southwark SE15 1SX	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
21 Hatcham Road London Southwark SE15 1TW	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
8 Manor Grove London Southwark SE15 1SX	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
10 Manor Grove London Southwark SE15 1SX	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 7 The Penarth Centre Penarth Street London So	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 21 107 - 109 Ormside Street London Southwark	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 24A The Penarth Centre Penarth Street London	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 23 Shirley Chisholm Court 62 Hatcham Road Lon	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 22 Shirley Chisholm Court 62 Hatcham Road Lon	B28	26/05/2022	23/06/2022

	B14	08/02/2023	22/02/2023
Flat 17 Shirley Chisholm Court 62 Hatcham Road Lon	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 14 Shirley Chisholm Court 62 Hatcham Road Lon	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 10 Shirley Chisholm Court 62 Hatcham Road Lon	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 3 Shirley Chisholm Court 62 Hatcham Road Lond	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 2 Shirley Chisholm Court 62 Hatcham Road Lond	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
4 Gerards Close London Southwark SE16 3DF	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 10 Warlingham House Varcoe Road London Southw	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
223-225 Ilderton Road London Southwark SE15 1NS	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 2 4 Eagle Close London Southwark SE16 3DJ	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
39 Manor Grove London Southwark SE15 1EQ	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Asaholah Salvation Church Of God 137A Ormside Stre	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023

18 Gerards Close London Southwark SE16 3DF	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Ilderton Primary School Ilderton Road London South	B28	26/05/2022	23/06/2022
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82 Varcoe Road London Southwark SE16 3DG	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Units 5 And 6 The Penarth Centre Penarth Street Lo	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 28A The Penarth Centre Penarth Street London	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Ground Floor 180 Ilderton Road London Southwark SE	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
First Floor 145 Ormside Street London Southwark SE	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 4 62 Hatcham Road London Southwark SE15 1TW	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Ground Floor 78-94 Ormside Street London Southwark	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
87 Manor Grove London Southwark SE15 1EH	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
6 Eagle Close London Southwark SE16 3DJ	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
3 Eagle Close London Southwark SE16 3DJ	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023

22 Gerards Close London Southwark SE16 3DF	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 1 Warlingham House Varcoe Road London Southwa	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
77 Manor Grove London Southwark SE15 1EH	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
49 Manor Grove London Southwark SE15 1EH	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
41 Manor Grove London Southwark SE15 1EQ	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
35 Manor Grove London Southwark SE15 1EQ	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
110-116 Ormside Street London Southwark SE15 1TF	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Studio 12 40-50 Hatcham Road London Southwark SE15	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Studio 7 40-50 Hatcham Road London Southwark SE15	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat A 217 Ilderton Road London Southwark SE15 1NS	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 19 The Penarth Centre Penarth Street London S	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 1 And 2 96-108 Ormside Street London Southwar	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023

Flat A 154 Ilderton Road London Southwark SE15 1NT	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 30 The Penarth Centre Penarth Street London S	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 2 211 Ilderton Road London Southwark SE15 1NS	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
235 Record Street London Southwark SE15 1TL	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 32A The Penarth Centre Penarth Street London	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Ilderton Wharf 1-7 Rollins Street London Southwark	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 17 107 - 109 Ormside Street London Southwark	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 27 Shirley Chisholm Court 62 Hatcham Road Lon	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 26 Shirley Chisholm Court 62 Hatcham Road Lon	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 19 Shirley Chisholm Court 62 Hatcham Road Lon	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 15 Shirley Chisholm Court 62 Hatcham Road Lon	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
23 Manor Grove London Southwark SE15 1EQ	B28	26/05/2022	23/06/2022

	B14	08/02/2023	22/02/2023
Flat 3 211 Ilderton Road London Southwark SE15 1NS	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
84 Varcoe Road London Southwark SE16 3DG	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
25 Manor Grove London Southwark SE15 1EQ	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 12 Canterbury Industrial Park 297 Ilderton Ro	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
5 Eagle Close London Southwark SE16 3DJ	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
1 Gerards Close London Southwark SE16 3DF	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 2 213 Ilderton Road London Southwark SE15 1NS	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
89 Manor Grove London Southwark SE15 1EH	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Studio 5 40-50 Hatcham Road London Southwark SE15	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat B 152 Ilderton Road London Southwark SE15 1NT	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 11 The Penarth Centre Penarth Street London S	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
23 Gerards Close London Southwark SE16 3DF	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023

9 Gerards Close London Southwark SE16 3DF	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
86 Varcoe Road London Southwark SE16 3DG	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
17 Manor Grove London Southwark SE15 1EQ	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
65 Manor Grove London Southwark SE15 1EH	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
53 Manor Grove London Southwark SE15 1EH	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 2 Canterbury Industrial Park 297 Ilderton Roa	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
107 - 109 Ormside Street London Southwark SE15 1TF	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Studio 6 40-50 Hatcham Road London Southwark SE15	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Apartment 4 90 Varcoe Road London Southwark SE16 3	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
3 Barnaby House Manor Grove London Southwark SE15	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Units 1 And 2 237 Record Street London Southwark S	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Units 32B And C The Penarth Centre Penarth Street	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023

67-105 Ormside Street London Southwark SE15 1TF	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 12 107 - 109 Ormside Street London Southwark	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 29 Shirley Chisholm Court 62 Hatcham Road Lon	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 28 Shirley Chisholm Court 62 Hatcham Road Lon	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 13 Shirley Chisholm Court 62 Hatcham Road Lon	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Second Floor Flat 209 Ilderton Road London Southwa	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Studio 1 40-50 Hatcham Road London Southwark SE15	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 22 The Penarth Centre Penarth Street London S	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
140 Ilderton Road London Southwark SE15 1NT	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
45 Manor Grove London Southwark SE15 1EQ	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
31 Manor Grove London Southwark SE15 1EQ	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
55 Manor Grove London Southwark SE15 1EH	B28	26/05/2022	23/06/2022

	B14	08/02/2023	22/02/2023
Unit 13 Canterbury Industrial Park 297 Ilderton Ro	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 23 Warlingham House Varcoe Road London Southw	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Studio 8 40-50 Hatcham Road London Southwark SE15	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
First Floor 78-94 Ormside Street London Southwark	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
25 Hatcham Road London Southwark SE15 1TW	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
4 Barnaby House Manor Grove London Southwark SE15	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Penarth Works Penarth Street London Southwark SE15	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 8 The Penarth Centre Penarth Street London So	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 14 Warlingham House Varcoe Road London Southw	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 11 Warlingham House Varcoe Road London Southw	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 8 Warlingham House Varcoe Road London Southwa	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023

75 Manor Grove London Southwark SE15 1EH	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
59 Manor Grove London Southwark SE15 1EH	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
River Of Life Pentecostal Church 12-38 Hatcham Roa	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
202 Ilderton Road London Southwark SE15 1NT	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 10 Canterbury Industrial Park 297 Ilderton Ro	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
18 Manor Grove London Southwark SE15 1SX	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
221 Ilderton Road London Southwark SE15 1NS	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
139 Ormside Street London Southwark SE15 1TF	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Studio 4 40-50 Hatcham Road London Southwark SE15	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 20 Left The Penarth Centre Penarth Street Lon	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
8 Barnaby House Manor Grove London Southwark SE15	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
6 Barnaby House Manor Grove London Southwark SE15	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
5 Barnaby House Manor Grove London Southwark SE15	B28	26/05/2022	23/06/2022

	B14	08/02/2023	22/02/2023
Flat B 154 Ilderton Road London Southwark SE15 1NT	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Ground Floor 145 Ormside Street London Southwark S	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 1 140 Ilderton Road London Southwark SE15 1NT	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 14 And 15 The Penarth Centre Penarth Street L	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Foodstars Peckham 107 - 109 Ormside Street London	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 5 107 - 109 Ormside Street London Southwark S	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 25 107 - 113 Ormside Street London Southwark	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 21 Shirley Chisholm Court 62 Hatcham Road Lon	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 16 Shirley Chisholm Court 62 Hatcham Road Lon	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 1 Shirley Chisholm Court 62 Hatcham Road Lond	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
43 Manor Grove London Southwark SE15 1EQ	B28	26/05/2022	23/06/2022

	B14	08/02/2023	22/02/2023
Iberia House Manor Grove London Southwark SE15 1EQ	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
2 Eagle Close London Southwark SE16 3DJ	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 5 Warlingham House Varcoe Road London Southwa	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
9 Manor Grove London Southwark SE15 1EQ	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 15 Warlingham House Varcoe Road London Southw	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 20 Warlingham House Varcoe Road London Southw	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 18 Warlingham House Varcoe Road London Southw	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 24 The Penarth Centre Penarth Street London S	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 13 The Penarth Centre Penarth Street London S	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Apartment 2 90 Varcoe Road London Southwark SE16 3	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Studio 2 40-50 Hatcham Road London Southwark SE15	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023

143 Ormside Street London Southwark SE15 1TF	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 31 The Penarth Centre Penarth Street London S	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 25 And 26 The Penarth Centre Penarth Street L	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 3 The Penarth Centre Penarth Street London So	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
113 Ormside Street London Southwark SE15 1TF	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 1 221 Ilderton Road London Southwark SE15 1NS	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 5 4 Eagle Close London Southwark SE16 3DJ	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
7 Eagle Close London Southwark SE16 3DJ	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
13 Gerards Close London Southwark SE16 3DF	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 17 Warlingham House Varcoe Road London Southw	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 16 Warlingham House Varcoe Road London Southw	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
24 Gerards Close London Southwark SE16 3DF	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023

148-150 Ilderton Road London Southwark SE15 1NT	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
33 Manor Grove London Southwark SE15 1EQ	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
217 Ilderton Road London Southwark SE15 1NS	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
115-125 Ormside Street London Southwark SE15 1TB	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 5 Canterbury Industrial Park 297 Ilderton Roa	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Studio 9 40-50 Hatcham Road London Southwark SE15	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat A 152 Ilderton Road London Southwark SE15 1NT	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Part First Floor Front 180 Ilderton Road London So	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
141 Ormside Street London Southwark SE15 1TF	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 2 140 Ilderton Road London Southwark SE15 1NT	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
149 Ormside Street London Southwark SE15 1TF	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 3 107 - 109 Ormside Street London Southwark S	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023

Mangia Pasta And Burger 107 - 109 Ormside Street L	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 25 Shirley Chisholm Court 62 Hatcham Road Lon	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 11 Shirley Chisholm Court 62 Hatcham Road Lon	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 6 Shirley Chisholm Court 62 Hatcham Road Lond	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 4 Shirley Chisholm Court 62 Hatcham Road Lond	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
The Waterhouse Project 3 Stockholm Road London Sou	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 24 Warlingham House Varcoe Road London Southw	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 6 4 Eagle Close London Southwark SE16 3DJ	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 1 4 Eagle Close London Southwark SE16 3DJ	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
2 Barnaby House Manor Grove London Southwark SE15	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
97 Manor Grove London Southwark SE15 1EH	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
15 Gerards Close London Southwark SE16 3DF	B28	26/05/2022	23/06/2022

	B14	08/02/2023	22/02/2023
74 Varcoe Road London Southwark SE16 3DG	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
14 Gerards Close London Southwark SE16 3DF	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 34 The Penarth Centre Penarth Street London S	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 2 62 Hatcham Road London Southwark SE15 1TW	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 23 The Penarth Centre Penarth Street London S	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
12 Manor Grove London Southwark SE15 1SX	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
First Floor Flat 209 Ilderton Road London Southwar	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 3 62 Hatcham Road London Southwark SE15 1TW	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
118-120 Ormside Street London Southwark SE15 1TF	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
80 Varcoe Road London Southwark SE16 3DG	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
78 Varcoe Road London Southwark SE16 3DG	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
76 Varcoe Road London Southwark SE16 3DG	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023

Flat 21 Warlingham House Varcoe Road London Southw	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 3 Warlingham House Varcoe Road London Southwa	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
29 Manor Grove London Southwark SE15 1EQ	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
15 Manor Grove London Southwark SE15 1EQ	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
67 Manor Grove London Southwark SE15 1EH	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
7 Manor Grove London Southwark SE15 1EQ	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
37 Manor Grove London Southwark SE15 1EQ	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Apartment 6 90 Varcoe Road London Southwark SE16 3	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Living Accommodation 224 Ilderton Road London Sout	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
First Floor Rear 180 Ilderton Road London Southwar	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Corner Of Sharratt Street 257-283 Ilderton Road Lo	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 1 2 And 4 The Penarth Centre Penarth Street L	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023

Clean Kitchen Club 107 - 109 Ormside Street London	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
71 Manor Grove London Southwark SE15 1EH	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
63 Manor Grove London Southwark SE15 1EH	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 6 Warlingham House Varcoe Road London Southwa	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 4 Canterbury Industrial Park 297 Ilderton Roa	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
145 Ormside Street London Southwark SE15 1TF	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
212 Ilderton Road London Southwark SE15 1NT	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
19 Manor Grove London Southwark SE15 1EQ	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
69 Manor Grove London Southwark SE15 1EH	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 3 96 - 108 Ormside Street London Southwark SE	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
224 Ilderton Road London Southwark SE15 1NT	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
182-196 Ilderton Road London Southwark SE15 1NT	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 4 4 Eagle Close London Southwark SE16 3DJ	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023

8 Gerards Close London Southwark SE16 3DF	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 29 The Penarth Centre Penarth Street London S	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Apartment 5 90 Varcoe Road London Southwark SE16 3	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 21A The Penarth Centre Penarth Street London	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
1 Barnaby House Manor Grove London Southwark SE15	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 12 The Penarth Centre Penarth Street London S	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
14-38 Hatcham Road London Southwark SE15 1TW	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 3 4 Eagle Close London Southwark SE16 3DJ	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
20 Gerards Close London Southwark SE16 3DF	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
6 Gerards Close London Southwark SE16 3DF	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
2 Gerards Close London Southwark SE16 3DF	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 22 Warlingham House Varcoe Road London Southw	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023

Flat 9 Warlingham House Varcoe Road London Southwa	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
206-210 Ilderton Road London Southwark SE15 1NT	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
27 Manor Grove London Southwark SE15 1EQ	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 7 Canterbury Industrial Park 297 Ilderton Roa	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
47 Manor Grove London Southwark SE15 1EQ	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Apartment 3 90 Varcoe Road London Southwark SE16 3	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Units 32 And 32A The Penarth Centre Penarth Street	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
9 Barnaby House Manor Grove London Southwark SE15	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 3B Canterbury Industrial Park 297 Ilderton Ro	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Units 16 And 17 The Penarth Centre Penarth Street	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Mimi Kitchen 107 - 109 Ormside Street London South	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 20 Shirley Chisholm Court 62 Hatcham Road Lon	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023

Flat 12 Shirley Chisholm Court 62 Hatcham Road Lon	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 5 Shirley Chisholm Court 62 Hatcham Road Lond	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 4 Warlingham House Varcoe Road London Southwa	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 11 Canterbury Industrial Park 297 Ilderton Ro	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
132-136 Ormside Street London Southwark SE15 1TF	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
95 Manor Grove London Southwark SE15 1EH	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
First Floor 96-108 Ormside Street London Southwark	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
21 Manor Grove London Southwark SE15 1EQ	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat B 219 Ilderton Road London Southwark SE15 1NS	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
91 Manor Grove London Southwark SE15 1EH	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
11 Manor Grove London Southwark SE15 1EQ	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 6 Canterbury Industrial Park 297 Ilderton Roa	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
International Secretariat 215 Ilderton Road London	B28	26/05/2022	23/06/2022

	B14	08/02/2023	22/02/2023
Unit 9 Canterbury Industrial Park 297 Ilderton Roa	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 7 Warlingham House Varcoe Road London Southwa	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 2 Warlingham House Varcoe Road London Southwa	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
90 Varcoe Road London Southwark SE16 3DG	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
5 - 9 Record Street London Southwark SE15 1TL	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
227-255 Ilderton Road London Southwark SE15 1NS	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
85 Manor Grove London Southwark SE15 1EH	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
19 Gerards Close London Southwark SE16 3DF	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
17 Gerards Close London Southwark SE16 3DF	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
16 Gerards Close London Southwark SE16 3DF	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
12 Gerards Close London Southwark SE16 3DF	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
88 Varcoe Road London Southwark SE16 3DG	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
1 Manor Grove London Southwark SE15 1EQ	B28	26/05/2022	23/06/2022

	B14	08/02/2023	22/02/2023
81 Manor Grove London Southwark SE15 1EH	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
73 Manor Grove London Southwark SE15 1EH	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
51 Manor Grove London Southwark SE15 1EH	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 8 Canterbury Industrial Park 297 Ilderton Roa	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Studio 13 40-50 Hatcham Road London Southwark SE15	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Studio 10 40-50 Hatcham Road London Southwark SE15	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Studio 3 40-50 Hatcham Road London Southwark SE15	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 28B The Penarth Centre Penarth Street London	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat A 219 Ilderton Road London Southwark SE15 1NS	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 1 211 Ilderton Road London Southwark SE15 1NS	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
236 Record Street London Southwark SE15 1TL	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Units 18 And 33 The Penarth Centre Penarth Street	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023

Unit 20 107 - 109 Ormside Street London Southwark	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
24 Manor Grove London Southwark SE15 1SX	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 24 Shirley Chisholm Court 62 Hatcham Road Lon	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 18 Shirley Chisholm Court 62 Hatcham Road Lon	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 9 Shirley Chisholm Court 62 Hatcham Road Lond	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 8 Shirley Chisholm Court 62 Hatcham Road Lond	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 7 Shirley Chisholm Court 62 Hatcham Road Lond	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
10 Gerards Close London Southwark SE16 3DF	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 3A Canterbury Industrial Park 297 Ilderton Ro	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 1 62 Hatcham Road London Southwark SE15 1TW	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
79 Manor Grove London Southwark SE15 1EH	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
61 Manor Grove London Southwark SE15 1EH	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023

Flat 13 Warlingham House Varcoe Road London Southw	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
1 Eagle Close London Southwark SE16 3DJ	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
21 Gerards Close London Southwark SE16 3DF	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
11 Gerards Close London Southwark SE16 3DF	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
83 Manor Grove London Southwark SE15 1EH	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
147 Ormside Street London Southwark SE15 1TF	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Part First Floor 78-94 Ormside Street London South	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Studio 11 40-50 Hatcham Road London Southwark SE15	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Unit 20 Right The Penarth Centre Penarth Street Lo	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
Flat 1 213 Ilderton Road London Southwark SE15 1NS	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
7 Barnaby House Manor Grove London Southwark SE15	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023
24A Manor Grove London Southwark SE15 1SX	B28	26/05/2022	23/06/2022
	B14	08/02/2023	22/02/2023

Flat A 209 Ilderton Road London Southwark SE15 1NS B28 26/05/2022 23/06/2022

B14 08/02/2023 22/02/2023

93 Manor Grove London Southwark SE15 1EH B28 26/05/2022 23/06/2022

B14 08/02/2023 22/02/2023

Appendix 5: Consultation responses received

Statutory and non-statutory organisations

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

Statutory and non-statutory organisations

Environment Agency
Metropolitan Police Service (Designing O

Neighbour and local groups consulted:

Kaymet London Ltd and Vital OKR 52 Ossory Road London
203, Studio 215, Mare Street Studios, 213 Mare St, London
141 Ormside Street London SE15 1TF
143 Ormside St Blackwall Hire Ltd London
15 Manor Grove London SE15 1SX
Studio 215 Mare Street Studios 203-213 Mare Street
15 Tennis st London SE1 1YD
110-116 Ormside Street London SE15 1TF
21 Hatcham Road London SE15 1TW

96-108 ormside Street SE15 1TF London SE15 1TF

Unit 32d Penarth Centre ormside st london

25 Hatcham Road London Southwark

Fooditude 182-196 Ilderton Road Southwark