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Meeting Name:	Planning Committee (Major Applications) A		
Date:	8 October 2024		
Report title:	Development Management planning application: Application 23/AP/0948 for: Full Planning Application Address: 6-12 VERNEY ROAD, LONDON, SOUTHWARK SE16 3DH Proposal: Demolition of existing buildings and structures on the site and redevelopment to provide an up to four storey building to accommodate industrial and logistics (Use Class B2, B8 and Class E(g)) plus part ground floor flexible Ea and/or Eb together with plant, landscaping, the formation of new accesses and alterations to existing accesses, associated vehicle and cycle parking and other associated works (as revised on 29.02.2024 and 29.04.2024).		
Ward(s) or groups affected:	Old Kent Road		
Classification:	Open		
Reason for lateness (if applicable):	Not Applicable		
From:	Director of Planning and Growth		
Application Start Date:	09.05.2023	PPA Expiry Date:	30.06.2024
Earliest Decision Date:	30.06.2024		

RECOMMENDATIONS

1. That planning permission be granted subject to conditions, the applicant entering into an appropriate legal agreement, and referral to the Mayor of London.
2. In the event that the requirements of paragraph 1 above are not met by 7 April 2025, the director of planning and growth be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 216.

EXECUTIVE SUMMARY

3. Commercial GIA:

Site Area	Proposed GEA	Proposed GIA	Proposed NIA
1.82 acres/0.74ha	25,947.6 sqm	22,881.8 sqm	18,968 sqm

LEVEL	B2/B8		B2/B8/E(a)/E(b)/E(g)		B2/B8/E(g)	
	Industrial & Logistics		Flexible		Light Industrial	
	GIA	GEA	GIA	GEA	GIA	GEA
Ground floor	3688.1 sqm	3841 sqm	485 sqm	531 sqm	None	None
Mezzanine	603.9 sqm	769.2 sqm	None	None	640.1 sqm	701.2 sqm
First Floor	6054.8 sqm	6233.6 sqm	None	None	None	None
Mezzanine	304 sqm	460.2 sqm	None	None	640 sqm	701 sqm
Second Floor	None	None	None	None	5191.5 sqm	5363.3 sqm
Third Floor	None	None	None	None	5173.7 sqm	5348.2 sqm
Roof Level	None	None	None	None	100.8 sqm	137.4 sqm
TOTAL	10650.8 sqm	11304 sqm	485 sqm	531 sqm	11746.1 sqm	12251.1 sqm

Environmental:

CO2 savings beyond part L Building Regs	64%
Trees Lost	0
Trees Gained	51

	Existing	Proposed	Change +/-
Urban Greening Factor		0.302	+0.302
Surface water runoff rates (6 hour in 100 years)	329l/s 460.61l/s (climate change)	7.3l/s 9.37l/s (climate change)	-321.7l/s -451.24l/s
Green/Blue roofs	0 green/0 blue	1945sqm (blue)/1549sqm (green)	+1945sqm (blue)/+1549sqm (green)
Car parking	20	4	-16
Blue Badge	0	1	+1
Cycle parking spaces	0	142 long stay/26 short stay	+168

CIL and S106

CIL (estimated)	£NIL
MCIL (estimated)	£1,391,199.92.
S106	<ul style="list-style-type: none"> • Carbon offset: £84,918.00 • Trees - £16,000.00 • Highways contribution- £200,000.00 • Legible signage - £22,000.00 • AWS – 10% PIL; figure to be agreed

BACKGROUND INFORMATION

Site location and description

4. The subject site measures 1.82 acres/0.74 hectares and is located on the southern side of Verney Road. It comprises two plots containing a mix of low-rise, predominantly brick and metal warehouses. Opposite the Site to its north, on Verney Road is the 6 and 19 storeys 'Bermondsey Works' scheme at 399 Rotherhithe New Road which contains the John Keats Primary Free School and the City of London VI form college at its western end. Silverlock Medical Centre is located adjacent to the primary school fronting Verney Way.
5. To the west, the Site is bounded by an electricity substation and the large warehouse buildings of 4 Verney Road. The Site is bounded along its eastern edge by a high boundary wall, and an access road to the industrial units to the east and south. A 13m wide access road separates the Site and 20-26 Verney Road.
6. To the south, the Site is bounded by the low rise industrial/commercial buildings of 14-16 Verney Road accessible from Verney Road, and 1-3 Wevco Wharf accessible from Sandgate Street. The surrounding area comprises a mixture of buildings used for industrial, commercial, residential and educational purposes.
7. The site is part of the wider allocation NSP68: Sandgate Street and Verney Road within the Southwark Local Plan, 2022. It lies within the Old Kent Road Opportunity Area as identified within the London Plan and forms part of the Bakerloo Line Extension Growth Corridor. As part of the draft Old Kent Road Area Action Plan, the site is allocated within Old Kent Road (OKR) 13 outlined as Sandgate Street, Verney Road and Old Kent Road (South). The Vision of which is to see the area being transformed into a mixed new neighbourhood with a diverse range of uses.
8. The Site is not located within or close to a conservation area. In terms of listed buildings, the Site does not contain any statutory or locally listed buildings. The Grade II listed Canal Grove Cottages are located approximately 75m to the south. In terms of Borough Views, the site intercepts two strategic views; Parliament Hill summit to St Paul's Cathedral, and Kenwood viewing gazebo to St Paul's Cathedral.
9. 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 North Southwark and Roman Roads Archaeological Priority Area.
10. Transport for London's (TfL) Public Transport Accessibility Level (PTAL) provides a score of 1-6b to rate areas within London and their accessibility to public transport options. A score of 1 represents the lowest accessibility with 6b being the best locations of accessibility to public transport. The subject site is

rated as 3 on the PTAL system indicating medium accessibility to public transport.

11. The development of the Bakerloo Line Extension (BLE) project is ongoing, with funding from TfL, the council and London Borough of Lewisham to further develop the detailed design of the scheme. In addition safeguarding still remains for the BLE's future provision.

Image: Site location in immediate context



Image – Land Use and Site Character



Map diagram showing the various land uses in and around the site

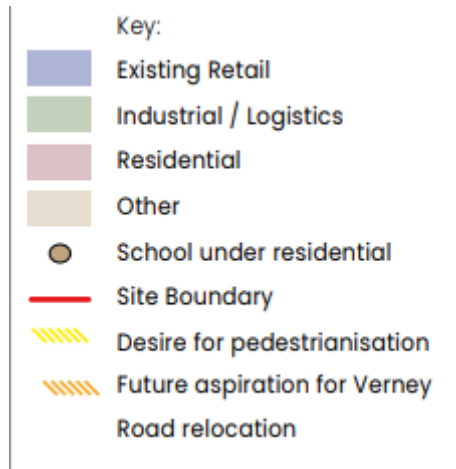
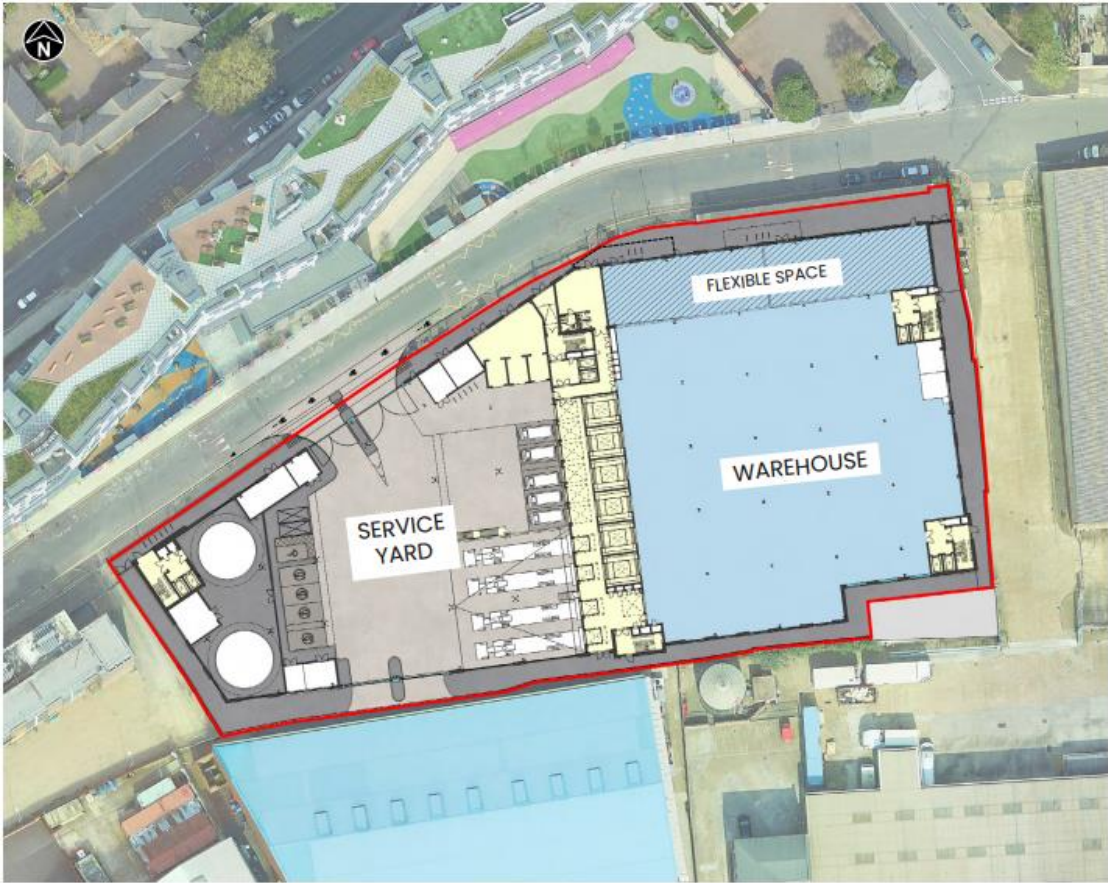
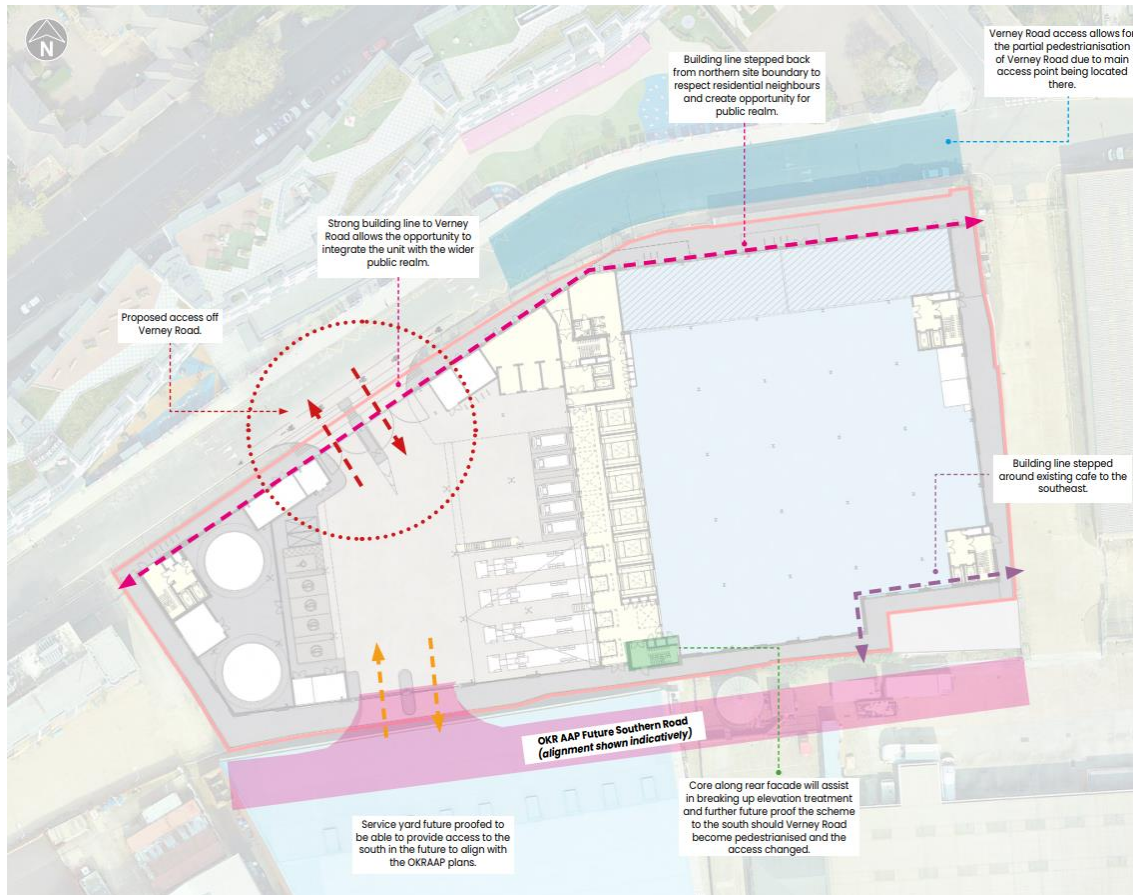


Image: Proposed Site Plan



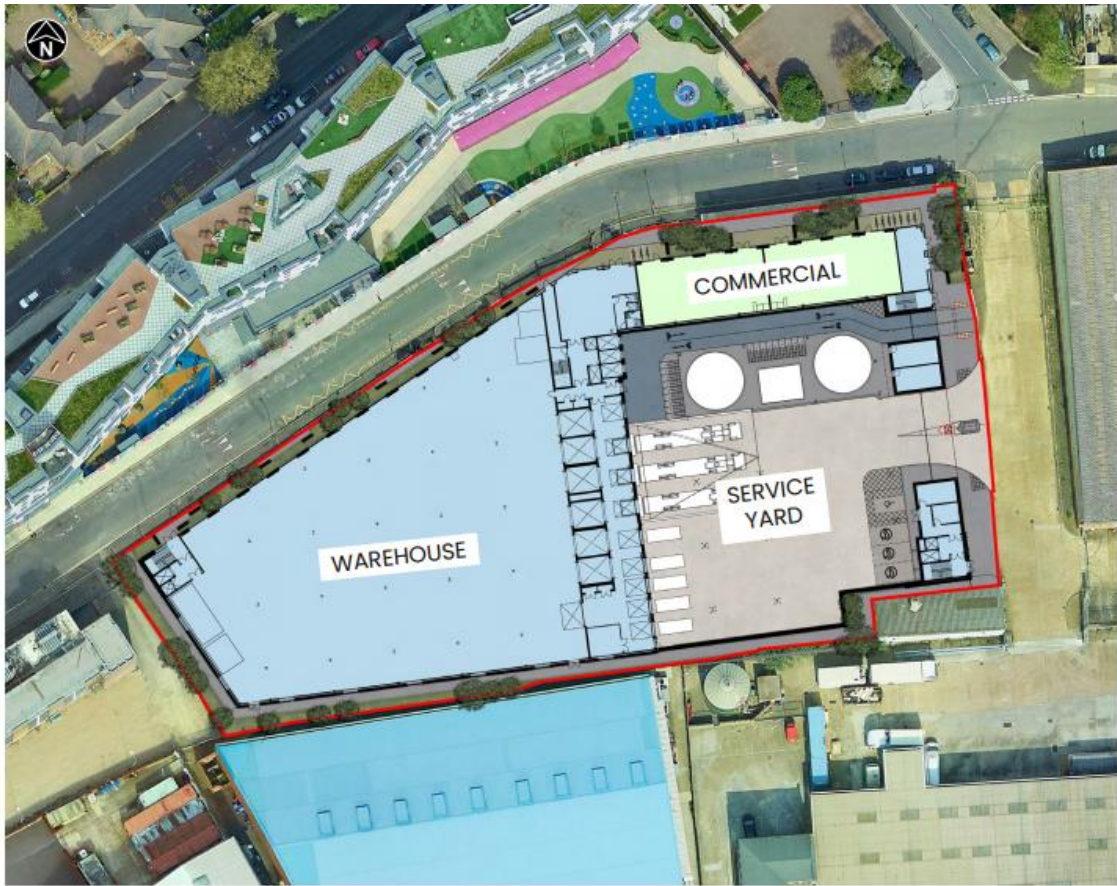
Proposed Site Plan
2024 Amended Scheme

Proposed site access principles



Details of proposal

12. Planning permission is sought for the demolition of existing buildings and structures on the site and redevelopment to provide an up to four storey building to accommodate industrial and logistics (Use Class B2, B8 and Class E(g)) plus part ground floor flexible E(a) and/or E(b) together with plant, landscaping, the formation of new accesses and alterations to existing accesses, associated vehicle and cycle parking and other associated works.
13. The subject scheme has been amended primarily because vehicular access has been changed from being taken off Verney Way (eastern side of the application site) to Verney Road (northern side of the application site). The 2023 original submission consisted of plans for a last-mile multi-level logistics development with a total GIA of approx. 20,864 sqm, with vehicular access into the covered service yard taken from the east off Verney Way. The 2024 amended scheme now consists of plans for a last-mile multi-level logistics development with a total GIA of approx. 22,881 sqm, with vehicular access into the covered service yard taken instead from the north, off Verney Road.



Proposed Site Plan
2023 Original Submission

The building would provide 22,881 sqm (GIA) of flexible Use Classes B2/B8/E(g), E(a), E(b) accommodation as set out in the below table.

Commercial GIA:

Site Area	Proposed GEA	Proposed GIA	Proposed NIA
1.82 acres/0.74ha	25,947.6 sqm	22,881.8 sqm	18,968 sqm

LEVEL	B2/B8		B2/B8/E(a)/E(b)/E(g)		B2/B8/E(g)	
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Ground floor	3688.1 sqm	3841 sqm	485 sqm	531 sqm	None	None
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TOTAL	10650.8 sqm	11304 sqm	485 sqm	531 sqm	11746.1 sqm	12251.1 sqm

14. The scheme also provides 4no. van parking spaces with electric vehicle charging and a single DDA compliant accessible parking space. The scheme proposed 4no. dock leveller loading doors and 5no. level loading bays. An additional level loading bay is proposed for cycle access. In terms of cycle parking, 13no. Sheffield hoops (26 spaces) are proposed for short stay visitor parking. 142no. covered spaces (comprised of Sheffield hoops, cycle lockers and Sheffield hoops) are provided for long stay cycle parking. Provision is also made for cargo bike access, including cargo bike lifts.

Image – Proposed ground floor layout

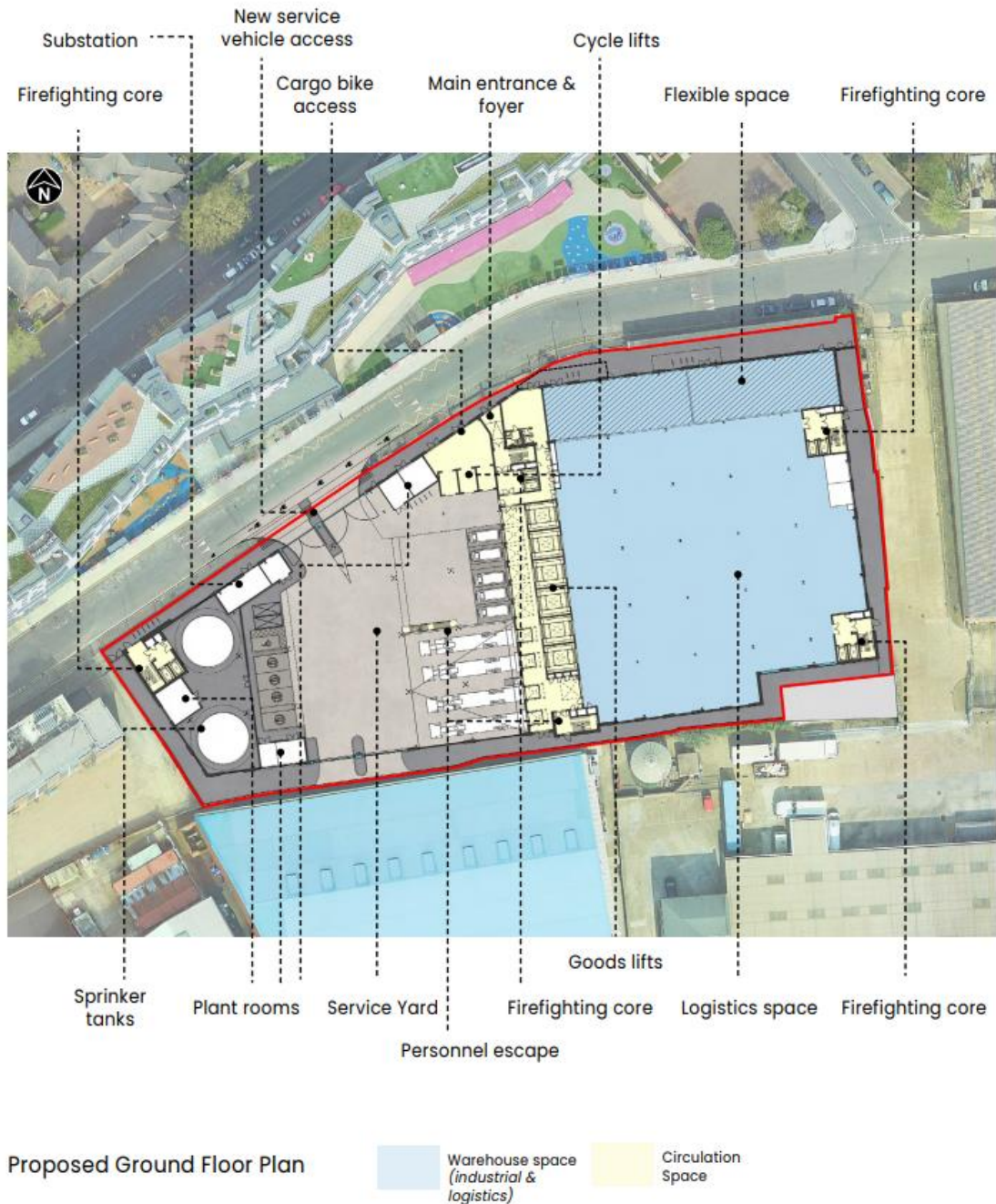


Image – Proposed Mezzanine Level plan

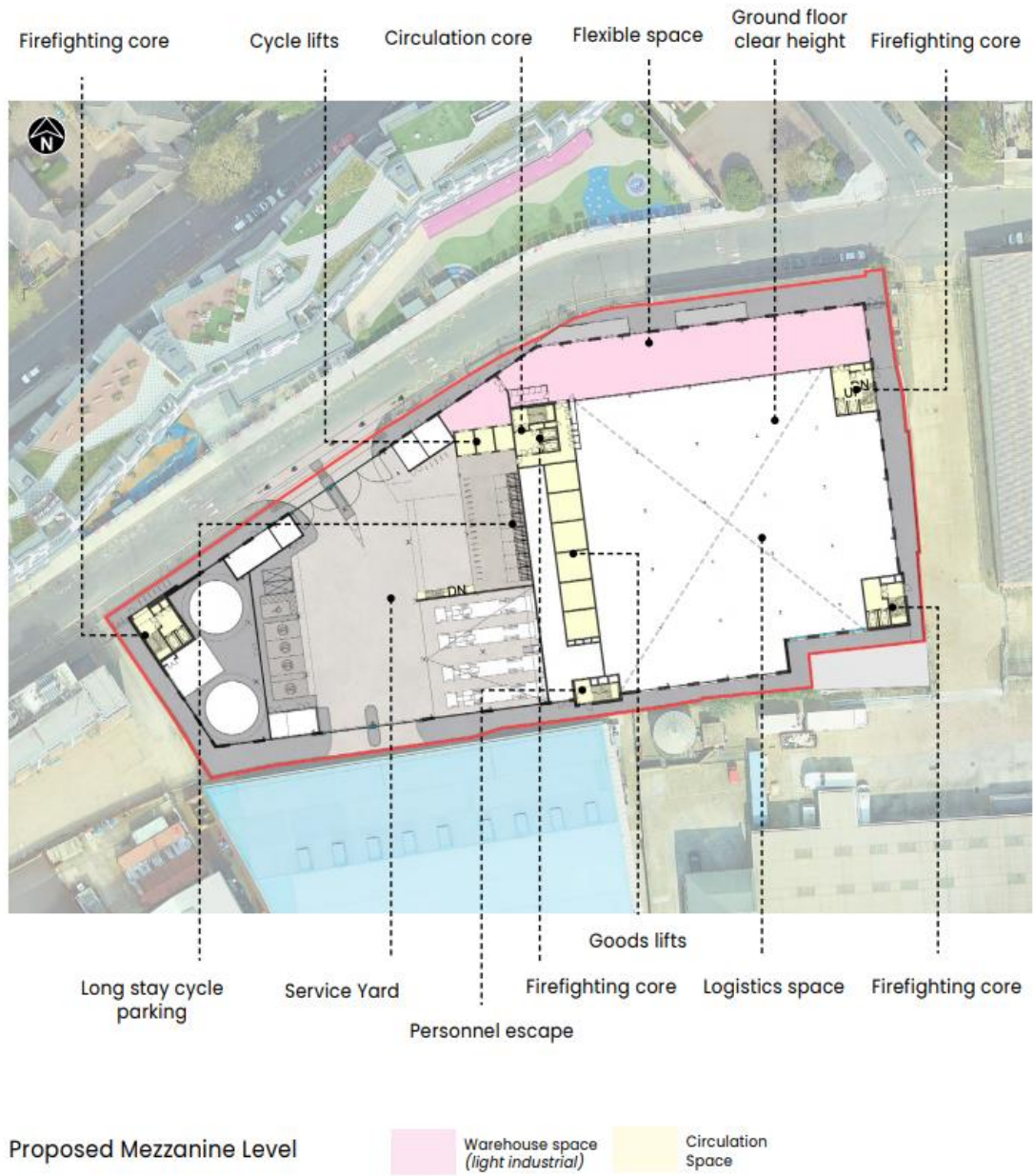
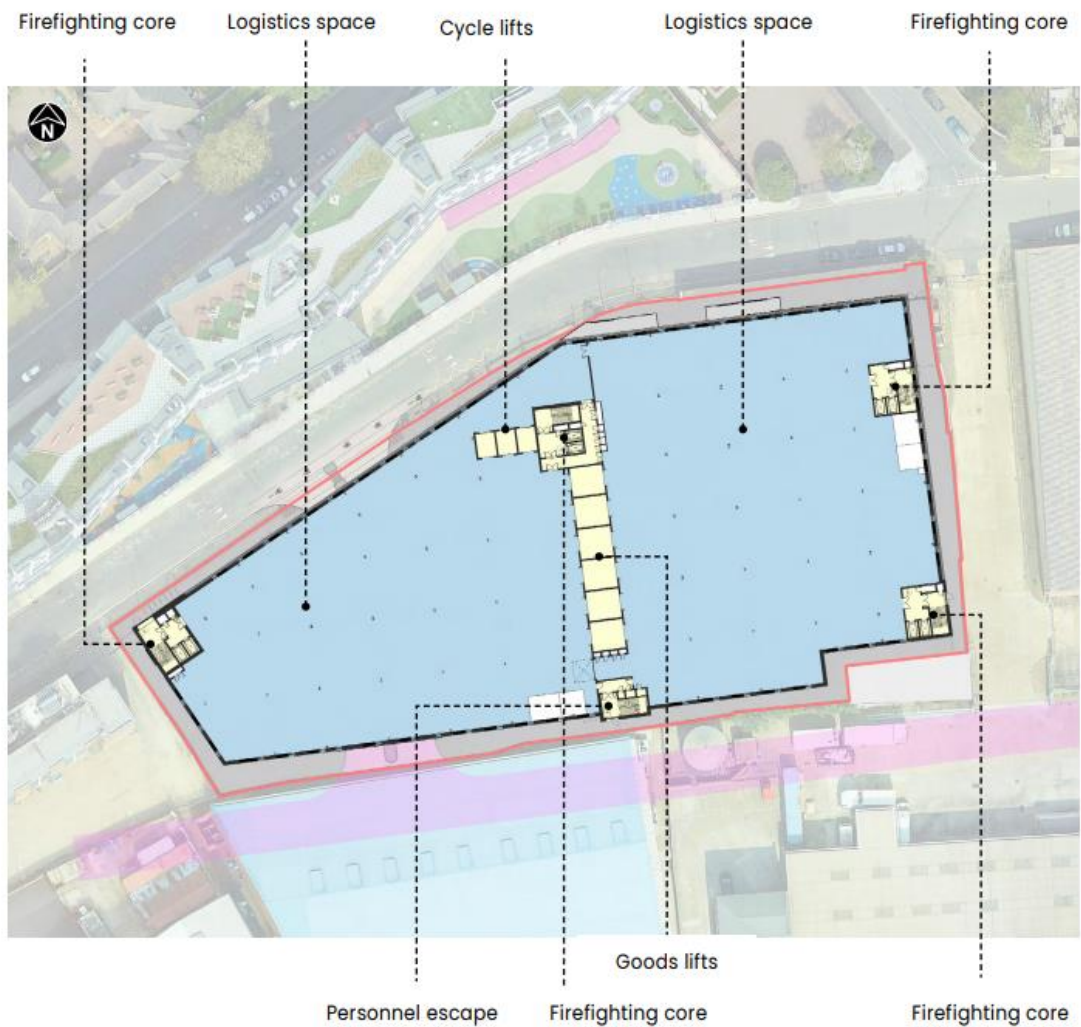


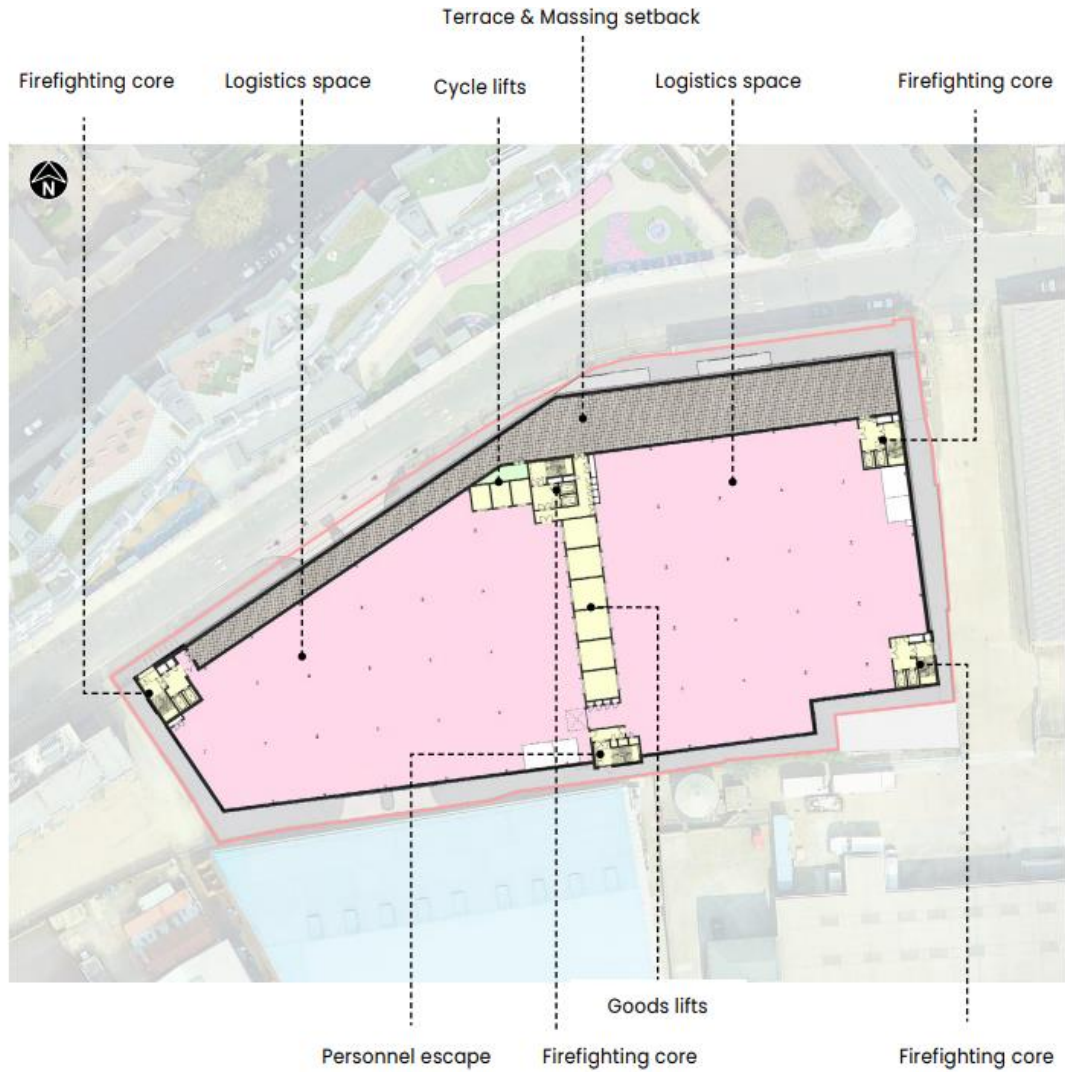
Image – Proposed First floor plan



Proposed First Floor Plan



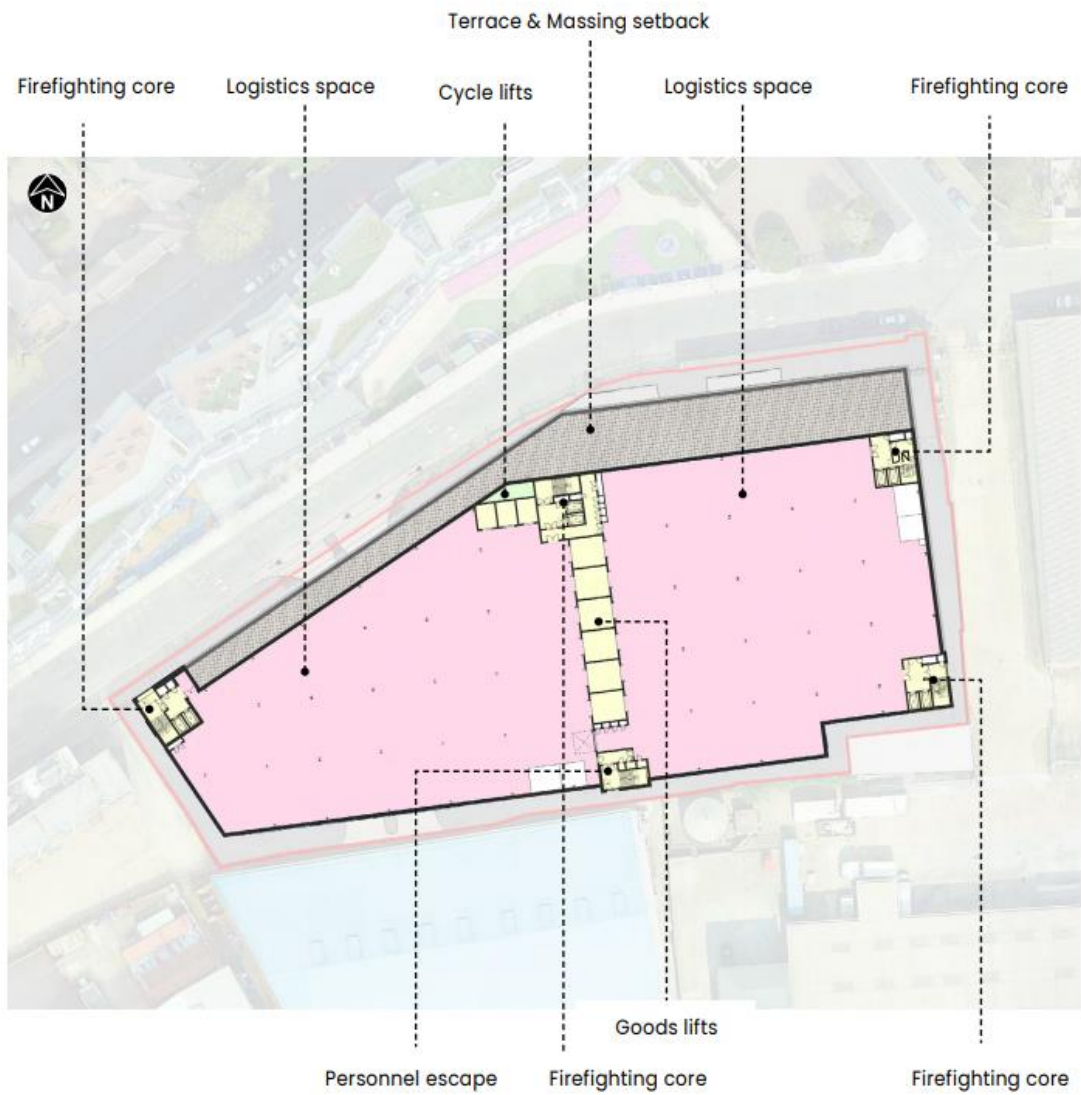
Image – Proposed Second floor plan



Proposed Second Floor Plan



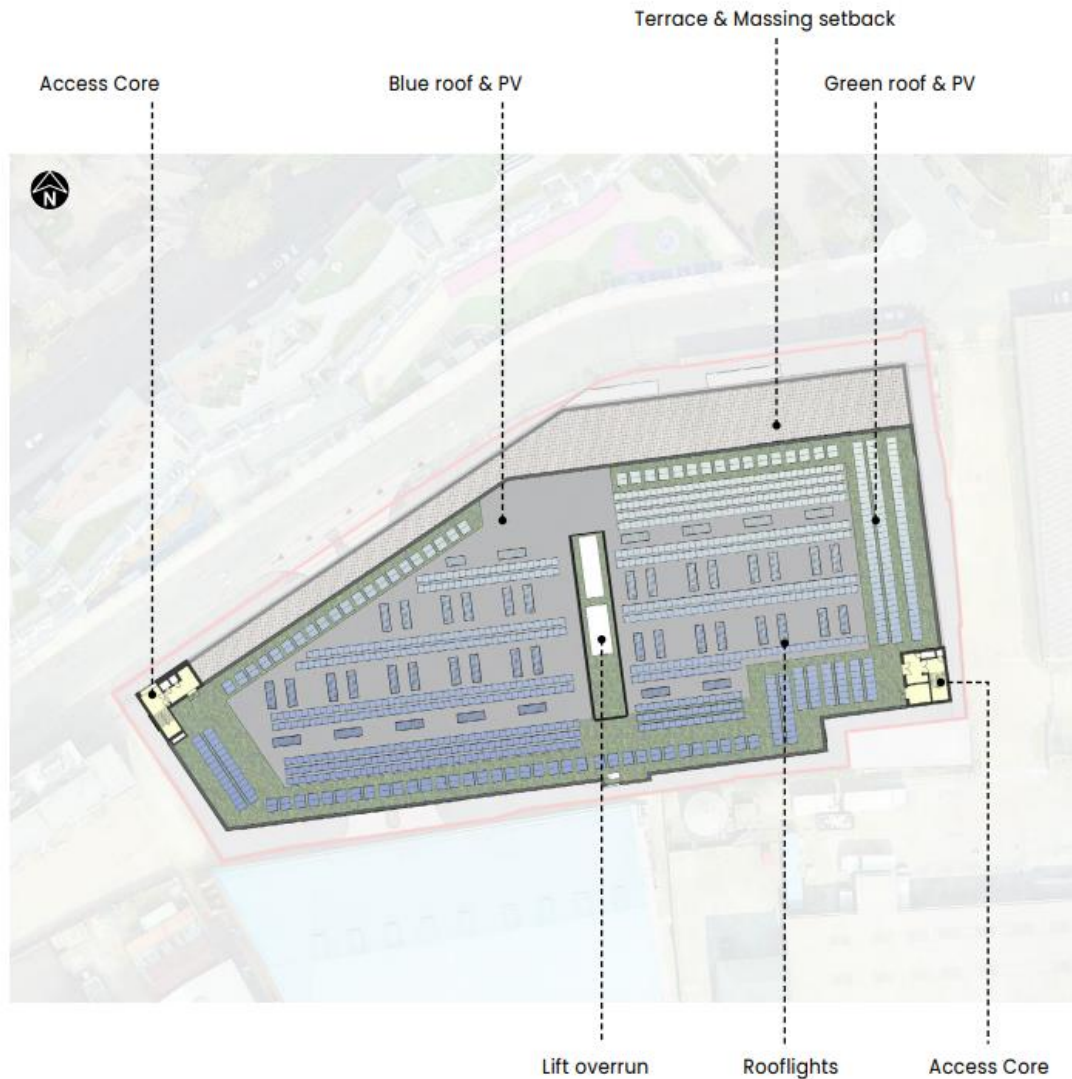
Image – Proposed Third floor plan



Proposed Third Floor Plan

Warehouse space (light industrial) Circulation Space

Image – Proposed Roof Level Plan



Proposed Roof Level Plan

Circulation Space

Amendments to the application

15. The initial scheme submitted in April 2023 and validated on 09.05.2023 was for a similar development description:

Demolition of existing buildings and structures on the site and redevelopment to provide an up to four storey building to accommodate industrial and logistics (Use class B2, B8 and Class E(g)) together with plant, landscaping, the formation of new accesses and alterations to existing accesses, associated vehicle and cycle parking and other associated works.

16. Following submission of the application in April 2023 and ongoing negotiations with the Council, the applicant advised that it is not possible to deliver the previously proposed access/egress from Verney Way as part of the current planning application. As such, the revised scheme proposes accesses and egress from Verney Road, similar to the existing employment site. Consequently, the proposed ground floor plan footprint has been amended, with the service yard remaining enclosed and relocated within the building footprint from the east to the west of the Site. The height and scale of the proposed building remains unchanged from the original application submission.
17. In summary the amended proposals would result in the following:
- Overall increase in GIA/GEA from 20,865/22,063sqm to 22,882sqm/24,086sqm respectively. The increase in floor space is due to the rationalised layout and a minor increase of the building line of the western elevation facing Verney Way by 1 metre.
 - The Ground Floor layout has been amended with the enclosed service yard relocated to the west of the Site.
 - Introduction of Flexible Class E(a) (Retail) and Class E(b) (Food and Drink) to the ground floor, northeast corner fronting Verney Way & Verney Road (alongside the originally proposed flexible Class Eg/B2 and B8).
 - Vehicular access to the Site has been relocated from the east on Verney Way, to the north off Verney Road. The access would consolidate the existing accesses into one point, for both ingress and egress. The crossing along the Site access would have a refuge island allowing safer crossing for pedestrians.
 - Enhancements to the materiality and fabric of the proposed elevations including enhanced reveals and finishes.
 - The amended scheme would provide a total of 26 short stay spaces and 142 long stay spaces.
 - A minor staff and operational trip generation increase because of the minor increase in GEA.
 - The updated access arrangements would result in a change in the assignment of vehicle trips on the highway network which remain minimal in terms of percentage uplift of local junctions, in both AM and PM peak hours.
 - The updated amendments would safeguard the ability to deliver the future aspirations of the Old Kent Road Area Action Plan; including potential future vehicle access to the south of the site and the part closure of Verney Road outside the entrance to the John Keats primary school and its conversion to a park space (to be secured as a s106 obligation).
18. The amended scheme was submitted to the Council in February 2024 and a re-consultation process was subsequently carried out by the Council.

Relevant planning history

19. January 2023 Request submitted for an EIA Screening Opinion for demolition of existing buildings and structures on the Site and redevelopment to provide an up to four storeys building to accommodate industrial and logistics (Use

Class B2, B8 and Class E(g)) together with plant, landscaping, the formation of new accesses and alterations to existing accesses, associated vehicle and cycle parking and other associated works. Decision issued in February 2023 that the development is not considered to be EIA development and that an Environmental statement would not be required to support the planning application. LPA Reference 23/AP/0071.

20. Planning permission subject to s106 agreement granted in February 2022 for redevelopment of the site for a mixed use development comprising three buildings (Building 1: basement, ground, ground mezzanine plus 17 storeys (AOD 66.975m); Building 2: basement, ground, ground mezzanine plus 22 storeys (AOD 81.975m); Building 3: basement, ground, ground mezzanine plus 16 storeys (AOD 62.675m) to accommodate 338 residential unit, 5,234 Sqm GEA of commercial floor space (Class B1(c)), associated cycle and car parking, servicing, refuse and recycling, landscaping including contribution towards the new Surrey Canal linear park, and private and communal residential amenity space and children's playspace. (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). LPA Reference 17/AP/4508. No applications submitted as yet to discharge any of the pre-commencement/precedent conditions.
21. September 2017 request submitted for an EIA Screening Opinion in respect of the proposed development at 6-12 Verney Road. The proposals are for the construction of three buildings (of up to 16, 17 and 22 storeys, plus basement level beneath two of the buildings). The development would provide a total of 334 residential units, with circa 3,898 sqm of office space, 1,241 sqm of community use and 422 sqm of retail space. The development would also include hard and soft landscaping works, car parking and cycle parking in the basement. Decision issued in October 2017 that the development is not considered to be EIA development and that an Environmental statement would not be required to support the planning application. LPA Reference 17/AP/3760.

Relevant planning history of adjoining sites this goes in the appendices

22. The most recent and relevant history on adjoining and nearby sites and within the allocated site NSP68 are at 399 Rotherhithe New Road; Ruby Triangle site bounded by Old Kent Road, Ruby Street and Sandgate Street; Varcoe Service station, 1 Varcoe Road; Land Bounded By Ruby Street Murdock Street And 685-695 Old Kent Road. The applicant for the subject application also submitted an application for a last mile logistics development proposal at 25 Mandela Way which has been approved and currently under construction which is also seen as being relevant in the formal consideration of the subject application.
23. 13/AP/0065
399 ROTHERHITHE NEW ROAD, LONDON, SE16 3HG: Demolition of existing building and the erection of a part 6, part 19 storey building (maximum height

from ground 61.3m) with basement for a mixed-use scheme comprising of 158 residential dwellings, primary school for Southwark Free School, sixth form and community centre for City of London Academy, with associated amenity and play space, basement car and cycle parking and landscaping. Granted subject to s106/278 agreements: 18 June 2017. Permission implemented.

24. 18/AP/0897
RUBY TRIANGLE SITE LAND BOUNDED BY OLD KENT ROAD, RUBY STREET AND SANDGATE STREET LONDON SE15 1LG: Demolition of existing buildings and structures on the site, and redevelopment consisting of three buildings at maximum heights of 17 storeys (including mezzanine) (+64.735m AOD), 48 Storeys (+170.830m AOD) and 40 storeys (including mezzanine) (+144.750m AOD), plus single storey basement under part of the site. Development would provide 1,152 residential dwellings (Class C3), retail, business and community spaces (Classes A1, A2, A3, A4, B1(a),(b),(c) and D1), public sports hall and gym (Class D2), public and private open space, formation of new accesses and alterations to existing accesses, energy centre, associated car and cycle parking and other associated works. Granted subject to s106 agreement on 6 June 2019.
25. 16/AP/5235
VARCOE SERVICE STATION, 1 VARCOE ROAD, LONDON, SE16 3DG: Demolition of existing building and development comprising a part six, part 7 and part eight storey building to accommodate 57 new affordable residential units (Use Class C3) and provision of flexible employment / retail space on ground floor (Use Class B1, A1-A3). Granted subject to s106 agreement on 28 September 2017. Implemented.
26. 18/AP/0196
LAND BOUNDED BY RUBY STREET, MURDOCK STREET AND 685-695 OLD KENT ROAD LONDON SE15 1JS: Demolition of existing buildings and erection of and construction of a part 3, part 7, part 22 storey building (76.6m) from ground level with roof top level amenity space, comprising 111 dwellings, 1,151 sqm (GIA) of D1 floorspace for a church with ancillary communal facilities, 2,173 sqm (GIA) of workspace (B1a and B1c Use Class) and 87 sqm (GIA) of A1/A2/B1 floorspace, with associated landscaping, car and cycle parking, servicing and refuse and recycling facilities. Granted subject to s106 agreement on 22 December 2020. Under construction.
27. 18/AP/2895
2 VARCOE ROAD, LONDON SE16 3DG: Demolition of existing buildings and erection of a new mixed-use development comprising a part 7, part 9 storey (maximum height above ground of 29.99m) building of 288sqm commercial floor space (Use Class B1) and 74 residential dwellings (Use Class C3) with associated bin stores, cycle stores, plant rooms and hard and soft landscaping. Granted subject to s106 agreement on 11 March 2020. Anticipated completion Q4 2024.
28. 19/AP/1710
CARPETRIGHT, 651-657 OLD KENT ROAD, LONDON SE15 1JU: Demolition of existing buildings on the site and the comprehensive mixed-use redevelopment of the site comprising of two buildings of 10-storeys plus

mezzanine (up to 38.900m AOD) and 19-storeys plus mezzanine (up to 71.500m AOD), comprising 262 residential units (Use Class C3 use), 2,320sqm GEA of flexible retail and commercial floorspace (Class A1/A2/A3/A4/B1 uses) at ground and mezzanine level, new public park, private and communal amenity space, associated car and cycle parking, access and servicing arrangements, plant and other associated works. Granted subject to s106 agreement on 4 November 2021. Under construction.

29. 23/AP/0950
25 MANDELA WAY, LONDON SE1 5SS: Demolition of existing buildings and structures on the site and redevelopment to provide an up to four storeys building to accommodate industrial and logistics (Use Class B2, B8 and Class E(g)) together with plant, landscaping, the formation of new accesses and alterations to existing accesses, associated vehicle and cycle parking and other associated works. Granted subject to s106 agreement on 8 February 2024. Under Construction.

Pre-application engagement

30. The Applicant undertook a pre-application consultation process (LPA Reference 22/EQ/0229) with officers with a number of Pre-Application Meetings being held in 2022 and 2023. LBS Officers generally supported the principle of the redevelopment of the site for logistics purposes subject to alterations to scale, massing and external material finishes. It was felt that the scheme is broadly compliant with the aims and objectives of the draft OKR AAP. The predominantly industrial use scheme that includes some mezzanine office space and a potential café would provide uplift on existing floor space.
31. There was also a pre-application presentation of the initial scheme to the Old Kent Road Community Review Panel (OKRCRP) on 30 January 2023.

“The OKRCRP meeting discussed the applicant’s schemes for two sites (25 Mandela Way; pp granted in February 2024 under LPA Ref 23/AP/0950 and is currently being constructed; and the application site). The CRP universally supported both schemes and had no concerns regarding the proposed use for the sites, providing they are operationally well managed in terms of vehicular movement, sustainable transport vehicles are used at both sites, and the facility is managed ethically in terms of employment. The panel liked the transparency and materiality of the buildings, particularly where views of the activities within are afforded from street level. However, it would like to see more active uses incorporated on the Dunton Road frontage of the 25 Mandela Way scheme to increase footfall and movement as this sits directly opposite the site allocated for a new Bakerloo Line Station. The panel also feels the design of the upper floors of the Verney Road scheme is too dominant, and suggests reducing the emphasis on a warehouse aesthetic to break down their scale, perhaps considering more Victorian brick railway architecture as a precedent. The panel also suggests that both buildings could be designed to be more architecturally distinctive and to play a greater role as local landmarks. The panel welcomes the team’s focus on enabling local employment at both sites. The panel feels it is important that the affordable workspace provision is carefully designed for use by the community and local businesses.”

KEY ISSUES FOR CONSIDERATION

Summary of main issues

32. The main issues to be considered in respect of this application are:
- Environmental impact assessment
 - Principle of the proposed development in terms of land use
 - Affordable workspace
 - Design, including layout, building heights, public realm, landscaping and trees
 - Heritage considerations
 - Archaeology
 - Impact of proposed development on amenity of adjoining occupiers and surrounding area, including privacy, daylight and sunlight, noise
 - Transport and highways, including servicing, car parking and cycle parking
 - Environmental matters, including flooding and air quality
 - Energy and sustainability, including carbon emission reduction
 - Ecology and biodiversity
 - Planning obligations (S.106 undertaking or agreement)
 - Mayoral and borough community infrastructure levy (CIL)
 - Consultation responses and community engagement
 - Community impact, equalities assessment and human rights

These matters are discussed in detail in the 'Assessment' section of this report.

Legal context

33. 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 OKR AAP. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires decision-makers determining planning applications for development within Conservation Areas to pay special attention to the desirability of preserving or enhancing the character or appearance of that area. Section 66 of the Act also requires the Authority to pay special regard to the desirability of preserving listed buildings and their setting or any features of special architectural or historic interest which they possess.
34. There are also specific statutory duties in respect of the Public Sector Equalities Duty which are highlighted in the relevant sections below and in the overall assessment at the end of the report.

Environmental impact assessment

35. Environmental Impact Assessment is a process reserved for the types of development that by virtue of their scale or nature have the potential to generate significant environmental effects.

36. The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 set out the circumstances in which development must be underpinned by an EIA. Schedule 1 of the Regulations sets out a range of development, predominantly involving industrial operations, for which an EIA is mandatory. Schedule 2 lists a range of development types for which an EIA might be required due to the potential for significant environmental impacts to arise. 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.
37. The range of developments covered by Schedule 2 includes 'Urban development projects' where:
the area of the development exceeds 1 hectare of urban development which is not dwelling house development; or the overall area of the development exceeds 5 hectares.
38. The application site is approximately 0.74 hectares and as such the proposal does not exceed the Schedule 2 threshold. Consideration, however, should still be given to the scale, location or nature of development, cumulative impacts and whether these or anything else are likely to give rise to environmental impacts of more than local significance.
39. The application proposes a commercial scheme that would involve the demolition of all of the existing buildings and have a building footprint that would cover some 90-95% of the site. It is noted that there would be an increase in size and height, but the development would be of a scale appropriate to its urban setting and is unlikely to give rise to any significant environmental impacts. Those impacts which are identified through the various submitted technical reports and studies can be mitigated through appropriate conditions or obligations.
40. An application for an EIA screening request was submitted in January 2023 under LPA reference 23/AP/0071. The Council determined on 27.02.2023 that the scheme would not be EIA development.

Assessment

Principle of the proposed development in terms of land use

41. The National Planning Policy Framework (NPPF) was updated in 2023 and is subject to consultation on a further revision at present. At the heart of the NPPF is a presumption in favour of sustainable development. The framework sets out a number of key principles, including a focus on driving and supporting sustainable economic development. Relevant paragraphs of the NPPF, and where relevant the current consultation draft are considered in detail throughout this report.
42. The NPPF also states that permission should be granted for proposals unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework as a whole.

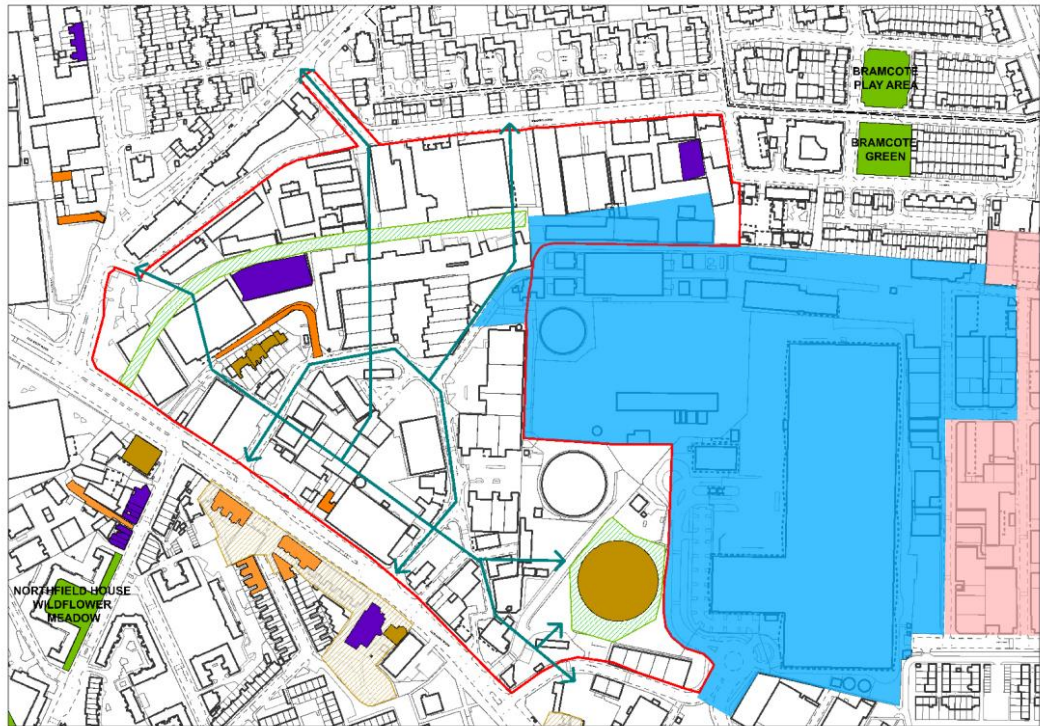
43. London Plan Policy SD1 encourages Opportunity Areas to optimise residential and non-residential output and density and contribute towards meeting (or where appropriate) exceeding the minimum guidelines for housing and/or indicative estimates for employment capacity. The OKROA is identified within the London Plan as having an indicative employment capacity of 5,000. Policy GG2 of the London Plan outlines the potential to redevelop on brownfield sites within opportunity areas.
44. The Draft OKR AAP has an indicative minimum capacity for the OKR 13 sub-area to provide 5300 new homes and 2,661 new jobs within the immediate area. The application site is part of the wider OKR13 allocated site, which also seeks to deliver 3 parks, a sports hall, a primary school and a secondary school. The vision for the wider OKR13 allocated site is that the area will be transformed into a mixed new neighbourhood with a diverse range of uses. While its character will change, it will continue to provide lots of jobs within a range of business spaces, including standalone industrial buildings, large warehouses that are integrated into mixed use buildings, small and medium sized industrial spaces and offices. New parks, a primary and secondary school, indoor sports hall, a possible health hub, access to shops and other facilities on Old Kent Road and a short walk to a tube station seeks to make the area a great place to live and work. Verney Road will be partially closed and servicing routes redirected into the site which will make way for the new Surrey Canal park. This will include a new park to the south the Bermondsey Works development and adjacent to the listed Canal Grove cottages retaining the row of mature trees. Gasholder no.13 will become a feature of a large new park and we will explore opportunities for its use as an outdoor swimming pool. In addition, developments in this allocation should replace existing employment floorspace, and provide a range of employment spaces in preferred typologies such as small industrial and office units. In terms of residential capacity, to date 1,767 homes have been built or have planning permission within this site allocation. Other sites within this allocation are likely to come forward for mixed use development. The use of this site for commercial purposes only would not undermine the delivery of the housing allocation.
45. There is an extant permission for mixed-use development (338 residential units plus 5,234 sqm GEA of commercial floor space) on the site (under LPA reference 17/AP/4508 dated 10/02/2022). The approved scheme includes three buildings of varying heights (AOD 62.675m; AOD 66.975m and AOD 81.975m). No applications to discharge the relevant pre-commencement conditions have been submitted. The permission expires in February 2025 subject to there being no submission and approval of any of the conditions precedent and discharge of the pre-commencement conditions and subsequent implementation within that time scale.
46. The 338 residential units would be included within the Phase 1 target of the BLE. The applicant has made clear that it is committed to bringing the site forward as a purely commercial development providing an increase of some 20,000 sqm above the approved scheme. Additionally, there are sufficient permissions in the pipeline for residential development within the wider OKR area and specifically this sub-area No.3 Sandgate Street/Verney Road with the increased densification through the use and provision of taller buildings with the

concomitant high-quality architecture promoted by the SP and the OKR AAP.

47. The existing use on site is not considered to maximise the potential of this Opportunity Area Proposal Site. The proposed re-development of the site would introduce a commercial building comprising floor space of flexible 22,881sqm Use Classes B2/B8/E(g), Ea and Eb accommodation. It is anticipated that the scheme would deliver major regeneration benefits that are further discussed in the proceeding parts of this report.

Sub-Area 3, OKR13 OKR AAP, Building typologies and land uses





Site Boundary	Improved connectivity for pedestrians and cyclists
Conservation Area	Open Spaces
Grade I Listed Building	Buildings of architectural and historic merit
Grade II Listed Building	Buildings of townscape merit
Grade II* Listed Building	Locally Significant Industrial Sites
Opportunity for Active Frontages	Strategic Protected Industrial Locations
Cycleways	Public Open Space
	Proposed Public Open Space

Industrial land

48. The site is a Locally Significant Industrial Site (LSIS) designation within the Southwark Plan. Southwark Plan policy P29 encourages the intensification of industrial uses within LSIS as does the OKRD AAP in policy AAP5.
49. The London Plan 2021 identifies LB Southwark as a borough which should retain industrial capacity.
50. The Old Kent Road was designated as an Opportunity Area through the previous iteration of the London Plan, with an indicative capacity of 1,000 new jobs and a minimum of 2,500 new homes. However, this has been increased to an indicative capacity of 12,000 homes, and 5,000 new jobs in the New London Plan (2021). The Draft OKR AAP sets targets of 20,000 new homes and 10,000 new jobs, to be supported by new infrastructure, including parks and schools. It proposes the release of a substantial part of the Strategic and local Preferred Industrial Location designation to allow for the creation of mixed-use neighbourhoods where new and existing businesses would co-exist with new homes. This release has now been confirmed in the recently adopted Southwark Plan.

51. The subject site is allocated within the Southwark Plan as part of Site Allocation NSP 68 and site OKR 13 of the AAP which allocates the site as part of a wider regeneration area. OKR 13 identifies that the area will continue to provide jobs and employment space including in standalone industrial buildings as shown in the Building Typologies and Land Use plan. Whilst this site is not identified for use as a standalone industrial building, it is considered suitable for such a use when considering the overall pipeline of housing coming forward in the remainder of the sub area.
52. The site is of sufficient size to accommodate this large-scale logistics development with flexible employment uses and with intelligent design has mitigated the impact on the neighbouring residents in Rotherhithe New Road and Canal Grove. As such, the application would represent a suitable typology for the site and enable the delivery of a the AAP plan ambitions to deliver an additional 10,000 jobs in the Opportunity Area.

Employment re-provision (no net loss)

53. Draft Policy AAP 5, and Southwark Plan Policy P30 require developments to retain or increase the amount of employment floorspace on site (Use Class E(g)) or sui generis employment generating uses). The development would provide 22,882sqm GIA of floorspace, in comparison to the existing 4,200sqm and the 5,234sqm of the extant permission. This is a significant uplift on employment floor space currently on site and approved.

Job creation

54. The application proposes to optimise the use of this underutilised industrial site with highly sustainable and innovative logistics development comprising some 22,882 sqm GIA and job creation of up to 450 jobs from the logistics hub.
55. The Council's Local Economy Team (LET) has been consulted and are fully supportive of the scheme. LET officers recommend that obligations under the s106 are imposed to secure the delivery of the policy compliant 10% affordable workspace to include the strategy as to how this will be achieved in accordance with LBS best practice, construction phase employment and end phase employment. LET officers have also agreed that there can be the flexibility of a policy compliant payment in lieu to meet the 10% obligation.

Assessment of main town centre uses

56. The subject site is designated within the Southwark Plan as being part of the Old Kent Road South District Town Centre. Given that the development would provide flexible commercial space approximately (531sqm GEA floorspace) comprising office, display/retail and sale of food and drinks on the ground floor of the building to help animate the building, it is considered that the scheme would help to deliver the future aspirations of the Town Centre and accord with Southwark Plan policy NSP68 and Old Kent Road AAP6.

Affordable workspace (AWS)

57. Southwark Plan Policy P31 (affordable workspace) includes a requirement for development proposing over 500sqm of employment space to include 10% of the proposed gross new employment floor space as affordable workspace on site. The Applicant is a well-established, specialist commercial developer working within the borough.
58. The development proposes to make a payment in-lieu of on-site provision to meet the 10% policy requirement. This approach is consistent with the development policy and is acceptable.

Conclusion on land use

59. The scheme would deliver major regeneration benefits, including a significant contribution to the borough's employment targets, inclusion of affordable workspace and the introduction of high quality commercial floorspace. It is therefore considered that the development, in land use terms, is acceptable, and its contribution to Site Allocation NSP68/OKR13 and the surrounding Old Kent Road Opportunity Area (OKROA) should be supported.

Design considerations

60. Policy P13 (Design of places) of the Southwark Plan states that development should ensure height, scale, massing and arrangement respond positively to the existing townscape, character and context. Policy P14 (Design quality) Requires developments to have high standards of design including building fabric, function and composition, along with innovative design solutions that are specific to the site's historic context, topography and constraints. With specific reference to tall buildings, Policy D9 of the London Plan (2021), 'Tall Buildings' and P17 (Tall buildings) of the Southwark Plan sets out design requirements for tall buildings, both of which are discussed in further detail in the following paragraphs. The tall buildings policies also state that the highest tall buildings will be located in areas where there is the greatest opportunity for regeneration, including Opportunity Areas, such as The Old Kent Road Opportunity Area.

Site layout

Site context

Image – Aerial photo



Google Earth birds eye view of site and surrounding Verney Road

61. The subject site is predominantly rectangular in shape and measures circa 0.75 hectares. The site is comprised of two plots containing a mix of low-rise, predominantly brick and metal warehouses with gable end frontages. Adjacent to the subject site, to the west, is the part 6, part 19 storey 'Bermondsey Works' development located at 399 Rotherhithe New Road. The BW building contains the John Keats Primary Free School and the City of London sixth college at its western end. Silverbrook Medical Centre is located adjacent to the primary school. A school coach parking bay and 'Keep Clear' zone for the primary school is located on the northern side of Verney Road. Residential dwellings occupy the upper floors of the building. To the south and southeast the site is bounded by the low rise industrial/commercial buildings of 14-16 Verney Road that are accessible from Verney Road, and 1-3 Wevco Wharf accessible from Sandgate Street. Further residential properties, nos. 1-17 Canal Grove cottages.

Site layout

62. The built form extends across the majority of the site allocation, setting back from the Verney Road frontage, to provide increased public realm outside the school opposite. The massing has been designed to contribute to increased streetscape to the rear and eastern edge of the site, which will benefit future development of the wider masterplan. The upper level has been set back along Verney Road to reduce the impact of the massing on the school, proposed linear park and residential properties opposite. The setback is considered to provide additional articulation to the form.
63. The site is situated in site allocation OKR13 of the Old Kent Road Area Action Plan. The masterplan envisages the eventual closure of Verney Road to create a linear park with a primary servicing route being created along the historic canal alignment, to the south of the existing Verney road. With this in mind the development has carefully considered the design of the southern elevation to create a positive frontage to the new Verney Road when it comes forward. Careful consideration has also been given to the articulation of the form to minimise the impact of the proposal on the surrounding context and nearby

heritage assets.

64. The majority of the development comprises the logistics hub, which lends itself to flexible industrial floorspace to facilitate multiple tenancies. Commercial uses front Verney Road, providing activation to the future Linear Park. High proportions of glazing at lower levels would provide a street presence to the development.
65. The ground floor layout lends itself to be adapted as the area evolves. The ground floor has been designed to enable flexibility to its layout, accommodating the projected plans in the area as envisaged by the masterplan to accommodate a new servicing route and part closure of existing Verney Road. The servicing yard will be internalised to the northwestern corner of the scheme situated away from the entrance of the primary school. Internalised servicing will reduce noise impacts and protect the amenity of existing and emerging residents. The proposed internal layout allows for direct access from the servicing yard via a central goods service lift to upper levels of the multi-storey industrial floorspace, providing a functional and efficient internal layout.
66. The existing urban grain consists of a mixture of warehouse typologies and residential housing. Historically the area formed part of the workings of the gas works, with the majority of the residential housing being replaced with industrial / commercial units to serve the gas works. As such, the proposed typology would be consistent with the historic pattern of development and the emerging character as set out in the AAP. Whilst the site remains impenetrable to pedestrians, it is considered to improve the existing streetscape environment by creating an improved frontage along Verney Road, with increased footways along Verney Way and the proposed new Verney Road alignment.

Height scale and massing

Image: Elevations



67. The proposed massing has been carefully considered to minimise the impact of the proposal on surrounding residents at Bermondsey Works and Canal Grove Cottages. The upper level is stepped back to provide relief in the form. The vertically stacked industrial hub consists of 4 storeys with industrial floor to ceiling heights, extending at its maximum point to 37.35 metres AOD which is determined as a tall building by definition of the London Plan. The building line is set back from the Verney Road frontage and opposite residents, providing a more generous public realm at ground floor.

Draft OKR AAP

68. Policy 8 of the draft OKRAAP sets out a tall building strategy, the OKR 'Stations and Crossings' that should be adhered to in order to maximise the potential of the Old Kent Road. 'Tier One' buildings represent developments that exceed 20 storeys in height. These developments are proposed to be sited in the vicinity of the proposed BLE stations, to mark their city-wide significance and optimise the use of land in the most accessible locations. A 'Tier Two' development (between 16 and 20 storeys) will mark places of local importance to help define their character and assist wayfinding.
69. 'Tier Three' tall buildings (up to 15 storeys) will act as markers within the neighbourhood. At appropriate corners and junctions, or in relation to important land uses, they will emerge from the lower buildings that enclose the streets and open spaces. Buildings that are not defined within the three-tier structure will generally be expected to be of a lower/mid-scale from 3 to 11 storeys

depending on context. Typically, they will form the shoulder height of podiums and/ or perimeter blocks defining streets within the masterplan or mediating the transition of scale on the edges of the masterplan. The majority of buildings at the edges of the masterplan are of a lower height to mediate the transition in scale between the masterplan proposals and existing residential communities.

70. The subject site is located towards the centre of the Masterplan within Sub Area 3. The AAP identifies the site as an opportunity for increased height more than the prevailing context. Page 168 of the AAP details the height guidance recommended within sub area 3. It should be noted that there is an extant permission for a mixed-use development comprising three taller buildings (a mixture of Tiers 2 and 3 tall buildings) already on the site, which establishes the principle of increased height in this location. Given the above, the height is therefore in line with the requirements of the OKR AAP.
71. **Image: The 'Stations and Crossings Strategy in the draft OKR AAP**

In line with the 'Stations and Crossings' strategy, the height and scale of development in this area should be greatest at the 'crossing' where Rotherhithe New Road/St James's Road meets Old Kent Road and should reduce towards the interface between new development and surrounding residential neighbourhoods.



72. As such, whilst the massing of the development will exceed the prevailing building heights, it is considered to be consistent with the emerging character of the area and the draft OKR AAP. The built form mediates the transition in scale to the historic cottages to the south of the site and would sensitively respond to the high-rise residential development opposite. The appearance of the proposed massing has been assessed below, where design detailing, expressed cores and window openings would create vertical and horizontal breaks to further modulate the form.

London Plan (2021)

73. As the development would be substantially taller than its existing surroundings, with the exception of the Bermondsey Works development opposite at Rotherhithe New Road, it would be defined as a tall building in the adopted London Plan (2021). Policy D9 of the 2021 London Plan, 'Tall Buildings', states that '*Boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan*'. Furthermore, London Plan Policy SD1 'Opportunity

Areas' affirms the need to ensure that Opportunity Areas maximise the delivery of affordable housing and create mixed and inclusive communities. Table 2.1 of Policy SD1 identifies Old Kent Road as an Opportunity Area with an indicative capacity of 12,000 new homes, and 5,000 new jobs. As such, the Old Kent Road Opportunity Area is, in principle, an appropriate location for tall buildings which optimise housing delivery and regeneration benefits. The proposed development is considered to achieve both, whilst also meeting the other requirements of London Plan Policy D9 such as architectural quality, visual, and environmental impacts of tall buildings which are discussed in further detail below.

74. National, Regional, and Local Policy state that the impact of tall buildings in sensitive locations, including the settings of conservation areas and listed buildings should be given particular consideration. The location of the subject site is located near the Livsey Conservation Area and Grade II listed buildings Canal Grove Cottages and the Grade II listed Gasholder no.13 from the former gasworks. The specific impact of the proposed development on this, and the wider townscape context is assessed in more detail below in the Heritage and Townscape Consideration section of this report.
75. The draft OKR AAP and LP Policy E7 identifies vertically stacked industrial typology as suitable for the intensification of industrial uses. The architectural design and functionality of the development has been carefully considered to ensure a high quality and efficient addition to the townscape.

Southwark Plan

76. Southwark Plan Policy P17 refers to tall buildings, and where they should be located within the borough. The identified areas are typically within Major Town Centres, Opportunity Area Cores, Action Area Cores and the Central Activities Zone. Individual sites where taller buildings may be appropriate have been identified in the site allocations. Contained within the Southwark Plan are areas within the borough identified as site allocations; The application site falls within site allocation NSP68. Given that the site has an extant permission for tall buildings; is located within the Old Kent Road Opportunity Area, and is identified in a site allocation, the site is considered to be a location where a tall building could be successfully integrated.
77. To further test the suitability of the site for a tall building, Policy P17 also states that the design of buildings should be exemplary in architectural design and makes a positive contribution to wider townscape character. Developments should maximise energy efficiency and prioritise the use of sustainable materials. Finally, tall buildings should have a positive relationship with the public realm, provide opportunities for new street trees, and design lower floors to successfully relate to and create a positive pedestrian experience through widened footways and routes to accommodate increased footfall. To assess the suitability of this site as an acceptable location for a tall building, Policy P17 requires proposals to:
 - Be located at a point of landmark significance; and
 - Have a height that is proportionate to the significance of the proposed location and the size of the site; and

- 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
- Not cause a harmful impact on strategic views, as set out in the London View Management Framework, or to our Borough views; and
- Respond positively to local character and townscape; and
- Provide a functional public space that is appropriate to the height and size of the proposed building; and
- Provide a new publicly accessible space at or near to the top of the building and communal facilities for users and residents where appropriate.

78. It is acknowledged that the subject site although devoid of any landmark features adjoins the distinctive 399 Rotherhithe New Road aka Bermondsey Works development site and it is anticipated that the proposal would further provide an urban presence and legibility given its positioning close to the proposed BLE tube station. The existing area consists of multi-storey industrial units, which provide large elevations with no articulation or activation. Ranging from 2-4 storeys in height with high floor to ceiling heights. As well as lower scaled 2 storey terraced houses. Whilst the development is not a tall building by definition, it would exceed the prevailing height of buildings that exist on site and is referable to the Mayor by virtue of its height (exceeding 30 metres plus providing more than 15,000 sqm non-residential floorspace). The scheme would not exceed the height of the adjoining development at Bermondsey Works. A thorough design consideration has been given to the appearance of the proposal in the townscape. The articulation along the Northern Elevation provides relief to the neighbouring residential properties, it also assists in reducing the overall bulk of the development when seen from mid to longer range views, as well as from the surrounding heritage assets. The development is considered to be compatible with and respects the scale and character of the surrounding area and its setting. The scale and massing of the scheme is considered to be an appropriate addition to the Old Kent Road skyline that would integrate effectively with other emerging tall buildings located within OKR13.
79. In conclusion, it is considered that the proposal's height, scale and massing would comply with the council's policies on urban design and ensure that it responds appropriately to its urban context.

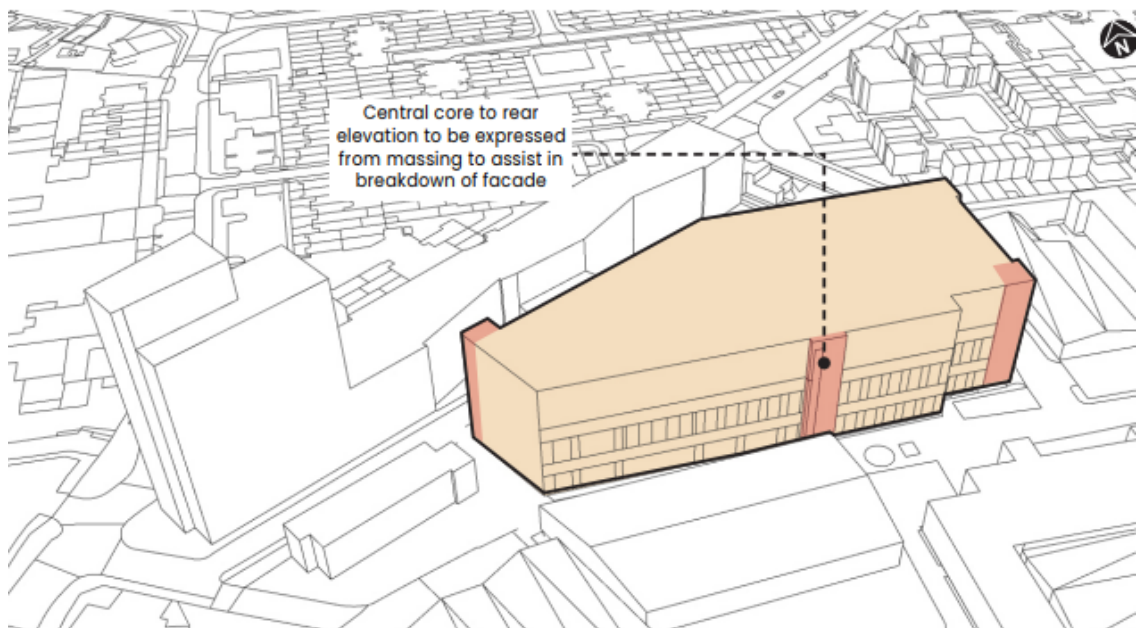
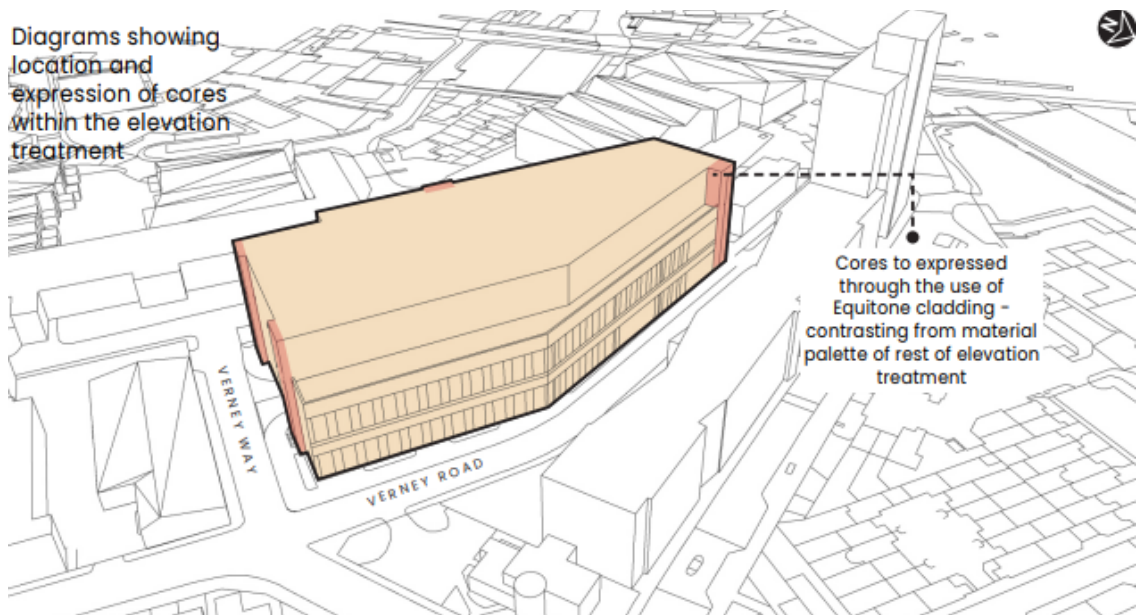
Architectural design and materials

Image: CGIs



80. The proposed architectural design has been well considered and is reflective of its internal use and historic industrial context. Further refinement of the elevational design has been carried out following engagement with officers, which has sought for a more original form with expressed cores, greater articulation across the facade, an increased into the amount of fenestration and a setback of the massing at upper levels.

Proposed cores and bays



81. Whilst the structure of the development is mostly consistent with the shape of the site. The set back at second and third floor level and the protrusion of stair cores provides additional interest and helps to modulate the form. The existing area is an eclectic mix of materials and architectural styles. The design is reflective of this context. The use of a brick has been included at the base of the development, positively grounding the upper levels and providing a rich durable finish at street level.
82. Regular slim fenestration bays across the upper levels in particular along Verney Road elevation help to provide an orderly break across the façade and window into work opportunities. The large ground floor openings relate directly to the street, activating the streetscape and providing an interactive frontage. Industrious style glazing bars responds to the scale of windows above. The sense of verticality and design of window bays are influenced by the industrious

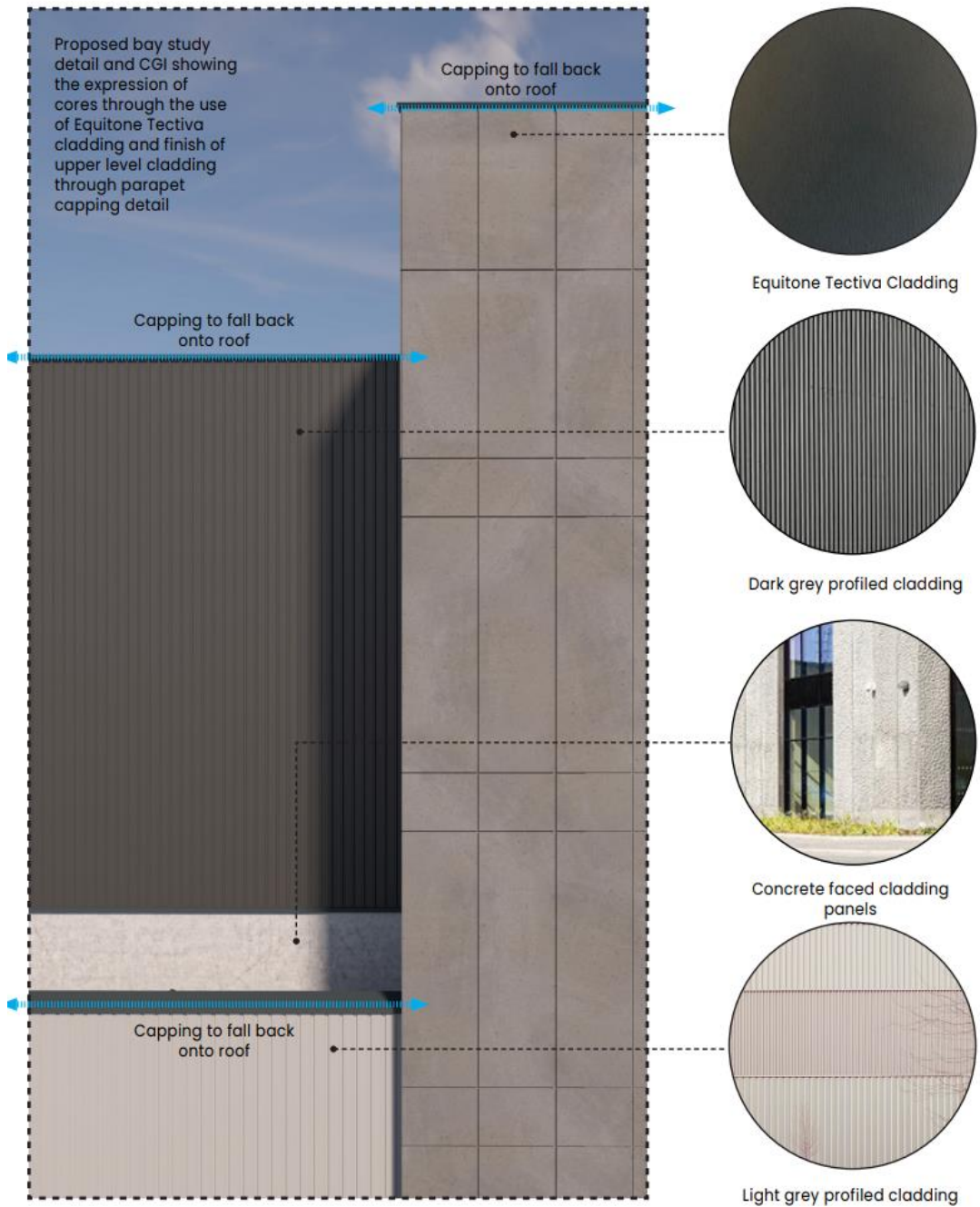
character of the area, which is in line with the AAP.

Upper storey setback



83. A generous setback would provide an amenity space for occupiers as well as providing a recess in the massing from the Bermondsey Works residents. Office space is situated on the Verney Road frontage, with an outlook over the proposed linear park providing passive surveillance.
84. The architectural finish responds to the character of the area integrating brick and cladding materials together, to give a high-quality industrious finish which is reflective of its internal use. Additional glazing to the cores provides a sense of activity and contributes to the industrious character of the building.
85. The three colour variations and alteration in materiality across the building helps to further modulate the form, providing horizontal breaks. A darker fascia panel in fibre cement cladding slightly projects forward to address the junction between the contrasting materials. Equitone cladding is proposed as a contrasting material that will run the full height of the cores to accentuate this structural component from the rest of the elevation. The cladding panels range in profiles to provide added interest in immediate views. Initial section drawings were submitted as part of the application and provide confidence that the junctions between the cladding panels will be dealt with sophisticatedly with hidden fixings and continued emphasis on the sense of verticality across the façade. To ensure that this level of detailing is continued to construction, a condition has been attached. The use of cladding in this instance at upper levels is supported, as will have a high-quality finish. Window mullion details reference earlier warehouse characteristics of the area and provide additional

depth to the window bays.



Conclusion on architectural design

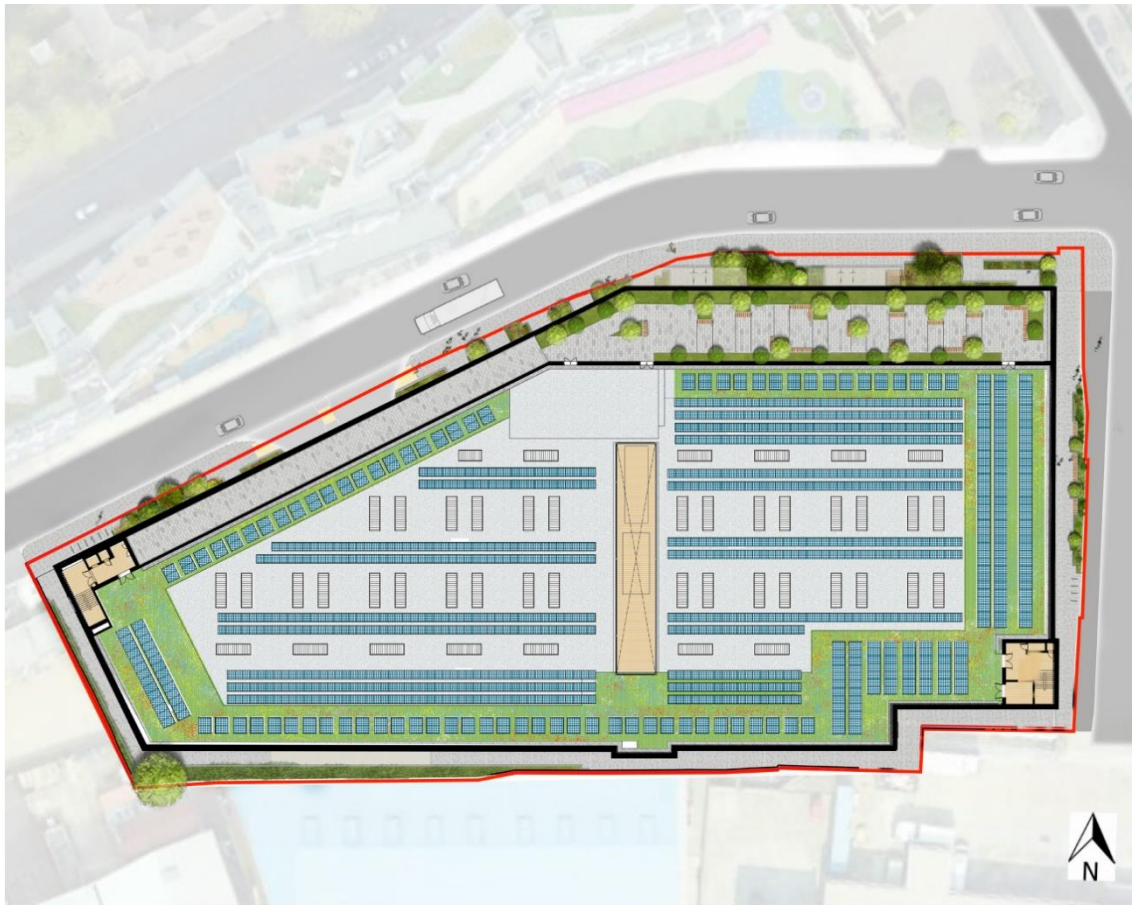
86. In conclusion, the architectural design and materiality of the proposal is considered to be of high-quality and will be an exemplary example of this typology as a standalone industrial building in a central urban context. The scheme is an unique and distinctive type of development which would positively integrate with the existing and emerging townscape. Overall, the design and proposed material palette is considered to be reflective of the existing character of the area, referencing its industrial heritage. In order to ensure a sophisticated finish to the proposal with high-quality, articulated facades, a condition is to be

imposed requiring a 1:10 sample panel to be presented on-site, to and approved by the Local Planning Authority.

Landscaping and Trees

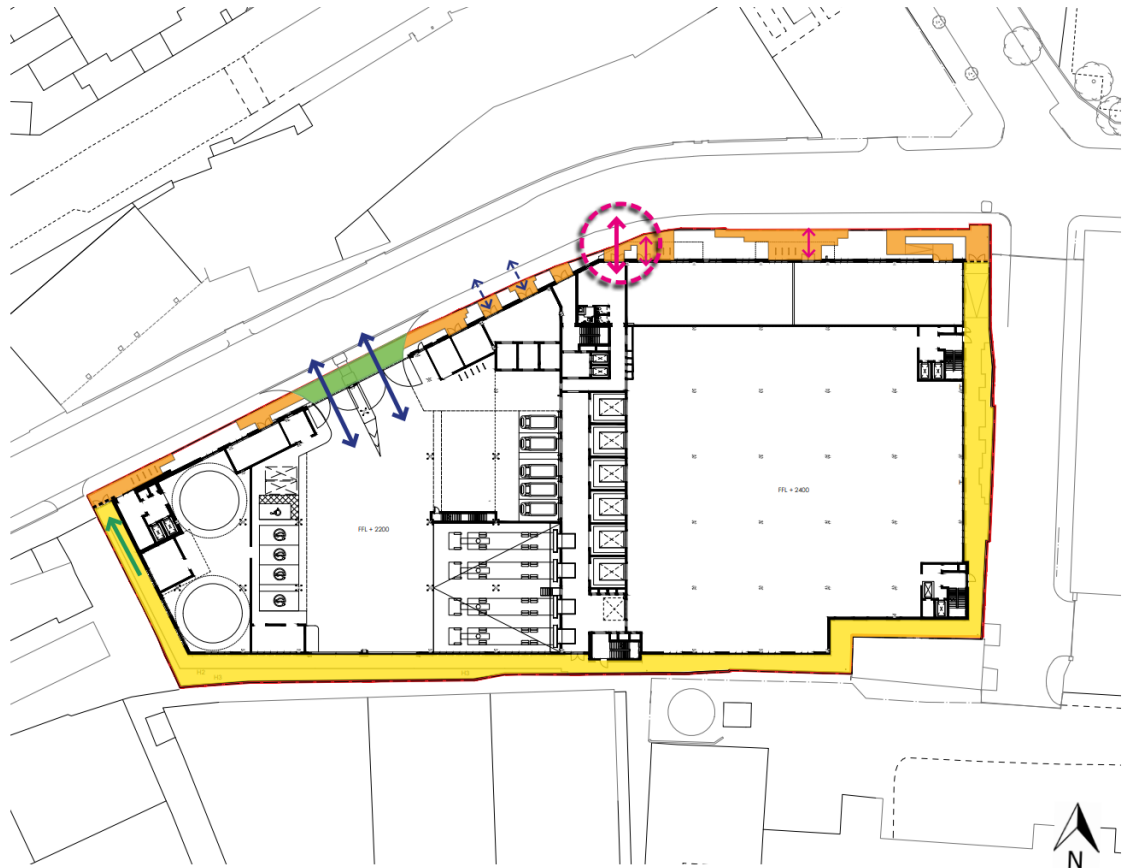
87. Policy 59 (Green Infrastructure) of the SP22 requires major development to provide green infrastructure with arrangements in place for long term stewardship and maintenance funding; for schemes that are referable to the Mayor to be publicly accessible and green links; and be designed to (1) Provide multiple benefits for the health of people and wildlife; (2) Integrate with the wider green infrastructure network and townscape / landscape, increasing access for people and habitat connectivity; (3) Be adaptable to climate change and allow species migration while supporting native and priority species; and (4) Extend and upgrade the walking and cycling networks between spaces to promote a sense of place and ownership for all. Policy 61 (Trees) of the SP22 states that Development will be permitted if trees are planted as part of landscaping and public realm schemes, commensurate to the scale and type of development, and the character of the neighbourhood.
88. The building is setback along the Verney Road frontage to provide a generous footway and contribute positively to the public realm and the conversion of the existing road to a linear park. The increased streetscape facilitates cycle parking, welcoming entrance spaces and pockets of green spaces. Additional greening outside the school would enhance the entrance space for pupils and teachers at the school, improving existing air quality and sense of the environment. The proposed landscaping should be carefully considered to ensure it is in line with the delivery of the Linear Park along the Verney Road alignment. It should provide opportunities for incidental play, trees and areas to dwell, considering its location in close proximity to the school entrance.
89. Employers' amenity space will be provided at upper level on the terrace. The built form is also set back from the southern edge of the site to enable increased footway widths when the new Verney Road is constructed. Landscaping proposals should improve Verney Way, which will become a pedestrian link for pupils.
90. It is understood that in the interim a fence will be provided along the Verney Way boundary for security. However, once the remaining area has come forward for development, in particular the delivery of the new Verney road, the fencing will be removed which will open up the streetscape and improve the public realm. As such, we are satisfied that the fencing as a temporary measure will be acceptable and will be greened to improve it's appearance in the interim.

Image: Landscape Masterplan for Ground Floor, Level 2 Terrace and Roof Top



Verney Road Landscape Masterplan

Ground floor landscape external accessibility



Access plan showing key access points

KEY

- Vehicle building access
- Additional footway
- Maintenance access only
- Level pedestrian access to building
- Secondary building access points
- Maintenance / emergency exit
- Vehicle entry / exit
- Cargo bike entry/exit
- Security gate
- Application boundary

91. The landscape design consists of proposals for the ground floor and roof levels of the scheme. At ground floor proposals include publicly accessible and private areas. All roof areas are private access only. Proposals at the ground floor includes publicly accessible hard and soft landscaping, seating, cycle parking and tree planting to the frontage of Verney Road. Hard and soft landscaping areas within the ground floor private area include maintenance paths and soft landscape boundary edges that will incorporate existing and proposed trees. There is a private terrace at level two that features soft landscaping with integrated seating offering an outdoor amenity area for those using the building. The roof areas will typically be non-accessible to users of the building/development and incorporate bio-diverse green roofs and zones for

solar panel installation above a blue roof system. The Council's Urban Forester has reviewed the scheme and is satisfied with these elements and has recommended the imposition of suitable conditions for hard and soft landscaping; a landscape management plan; tree planting strategy and a planning obligation to allow for a financial contribution should the tree planting strategy fail to deliver the requisite number of trees. The relevant conditions and planning obligation are thereby attached to this permission.

Urban greening factor

92. 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 0.3 for predominately commercial development (excluding E(g) iii uses).
93. The emerging landscape scheme indicates that the proposed development can achieve an Urban Greening Factor (UGF) of 0.302 and therefore exceeds what may be expected of a development of this type. London Plan Policy G5 sets out that a minimum UGF requirement for a commercial development in Greater London is 0.30 however, this excludes buildings within the use classes B2 and B8 as proposed at the site, for which lower thresholds may be applied.
94. A tree strategy is required as part of the s.106 and also species and planting details as secured by condition. Ideally providing a continuous tree pit at grade along Verney Road to ensure the best possible provision of soil volume and irrigation.
95. BNG reports will be assessed by the Senior Ecologist, however Urban Forestry is satisfied with the UGF preliminary report and plan, with details relating to species reserved to condition.
96. Suggested Conditions for ABOVE GRADE Hard and Soft Landscape and Tree Planting PRE- OCCUPATION Landscape Management Plan S.106 Tree Planting Strategy and Tree Contribution in lieu of any tree not planted in accordance with the tree planting strategy at a cost of £4,000 per tree (index linked).

Ecology and biodiversity

97. Policies P59 (Green infrastructure) of the Southwark Plan states that developments should provide multiple benefits for the health of people and wildlife, and to integrate with the wider green infrastructure network and townscape / landscape, increasing access for people and habitat connectivity and P60 (Bio-diversity) of the Southwark Plan states that Development must contribute to net gains in biodiversity through, amongst other things: Include features such as green and brown roofs, green walls, soft landscaping, nest boxes, habitat restoration and expansion, improved green links and buffering of existing habitats. The Council's Ecologist has reviewed the proposal and is

satisfied with the ecological assessment submitted in support of the scheme and has recommended the imposition of a number of conditions to cover the roof, soft landscaping and ecological features; bat tubes; swift bricks; further details of the vegetated blue roof; ecological monitoring; and invertebrate habitats. The relevant conditions are thereby attached to this permission.

Designing out crime

98. Policy D11 (Safety, security and resilience to emergency) of the London Plan, 2021 and Policy P16 (Designing Out Crime) of the Southwark Plan, 2022 requires development proposals to include measures to design out crime and for those measures to be considered at the start of the design process to ensure that they are inclusive and aesthetically integrated into the development and the wider area. The scheme has been subject to a security needs assessment and pre-application engagement with the Metropolitan Police. The SNE has informed the design process and will be incorporated within the detailed design of the scheme. The SNE provided recommendations for the main entrances and reception areas; service areas; façade (glazing and video security surveillance systems); warehouse floorplate entrances; final escape exits and cycle storage. The Secure by Design officers from the Metropolitan Police have reviewed the proposals and are encouraged by the design of the development and considers that it should be able to achieve the security requirements of Secured by Design. As such, this element of the scheme would accord with the relevant development plan policies. A condition is secured in the decision notice requiring the development to achieve Secured By Design accreditation.

Fire safety

99. Policies D5 (Inclusive Design), D11 (Safety, security and resilience) and D12 (Fire Safety) of the London Plan, 2021 require that: development proposals be designed to incorporate safe and dignified emergency evacuation for all building users; safety considerations must be central to the design and operation of tall buildings; and that buildings be designed and built to accommodate robust emergency evacuation procedures for all building users, including those who require level access. All building users should be able to evacuate from a building with dignity and by as independent means as possible.
100. The application was submitted with a supporting Fire Statement (FS) which was prepared to meet the London Plan policy aspirations. The FS has been prepared by a suitably qualified chartered engineer. The FS does not constitute the detailed fire strategy which is to be developed separately under Building Regulations. The document evidences the provisions made for the safety of occupants as well as the provision of suitable access and provisions for firefighting considering the London Plan's fire safety policy requirements and the rationale for these measures. The FS describes how the design of the development proposal can achieve compliance with Part B, of Schedule 1 of The Building Regulations (as amended) and the requirements of the relevant London Plan Policies for the scheme. The FS systematically assesses the development proposal going through the building construction; means of

escape; passive and active fire safety systems; ongoing management and maintenance; access for Fire Service personnel and equipment; vehicle access and future modifications. The supporting FS would accord with the relevant development plan policies for fire safety and a condition is attached to the permission to secure the delivery of the detailed fire strategy ensuring that it develops the principles covered by the FS.

Heritage considerations

101. 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 203 of the NPPF 2023 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.’
102. The site lies to the south of Verney Road in an area of light industrial use with low rise modern industrial buildings constructed of brick and faced in render. There are a few heritage assets in the vicinity of the site. The Livesey Conservation Area lies to the south of the Old Kent Road at some distance from the site. Further north of Old Kent Road are the grade II listed cottages at Canal Grove, immediately to the south of the site - 2-9 Canal Grove and the grade II listed lampstand. The Grade II Gasholder No 13 on the former Old Kent Road Gas Works site lies beyond the Livesey Conservation Area at some distance to the east. There is also a cluster of buildings immediate vicinity on the draft local list: 328 St James's Road and 330- 334 St James Road, a campus of former industrial buildings constructed in the late 19th century formed around a central courtyard. A little further to the east lies 32 Verney Road, a warehouse building of Victorian origins - this has also been added to the draft local list.
103. The Heritage statement accompanying the application provides a good outline of the historic development of the area including the impact of the lost Surrey Canal on the current development layout and heritage of the OKR area. In particular at para 2.30 the heritage statement gives a good commentary on the site, its immediate surroundings and its post Victorian development. It can be concluded that the buildings on the site have no or limited heritage value, however there are some assets in the vicinity whereby significance would be impacted by development within their setting.

Impact on heritage assets

104. In addition to the above policies and legislation, Historic England has also provided relevant guidance to assist in dealing with the matters of assessing the impact on heritage assets: Historic England advice note 3. The HE guidance identifies 5 steps to help advise and quantify impact on significance on each of these heritage assets. The application would affect the setting of the grade II listed cottages (Canal Grove), the Livesey Conservation Area and the grade II listed gasholder. This assessment is detailed below:

Canal Grove Cottages

105. 2-9 Canal Grove Cottages are a terrace of grade II listed buildings located on Canal Grove to the south of the site. They likely date from the early 19th century and are two storeys with low pitched roofs and stucco frontages. They exhibit classical hierarchy of Georgian villa fenestration and have private small front and rear gardens. They are arranged in a terrace of three central cottages, with two sets of link detached villas either side. They are a good example of middle-class villas dating from the mid Georgian expansion of the Old Kent Road area when the area was developing during this period. George Livesey, the industrialist who was the outstanding gas engineer of his generation was brought up in Canal Grove.
106. The setting of the cottages has been, at least since the late 19th century, industrial. Their location facing the canal but set back behind a wharf and then adjacent to gasometers in the 19th and early 20th century would have at least until the 1970s been associated with engineering, logistics and large-scale development. The late 19th century maps indicate the relationship with the southeast Caroline Road and the "Ruby Triangle" area to the east would have likely been more suburban and domestic with streets and terraces existing until the 1980s.
107. The proposed development would cause some harm to the significance of the Canal Grove Cottages, particularly the setting of 7, 8 and 9, because of the impact on the bulk of the development, and lack of articulation to the facades. The appreciation of the roof pitch and chimneys of the grade II listed buildings, would no longer be seen against a clear sky in views from Sandgate Street. The level of harm is considered to be "less than substantial".
108. The commentary associated with the view from Sandgate Street in the TVIA document, (Representative View Point 4) states:
- "From Sandgate Street at junction with Canal Grove, the Proposed Development would be clearly noticeable rising beyond the two to three storeys industrial development in the middle distance. The increase in height and massing would have a notable presence extending across the local skyline and increasing the influence of taller development. The Proposed Development would also result in the lost [sic] of articulation of the hipped roof of the Grade II listed cottage at no.9 Canal Grove which is currently experienced against a sky backdrop".

109. Originally, only an outline was provided in the cumulative proposed view and an architectural render of the view was requested. This was subsequently submitted with the revised scheme details.
110. Para 208 of the NPPF allows public benefits to outweigh the harm to the asset. The scheme was amended during the course of its consideration to increase their articulation of the elevation which is seen in the context of the cottage buildings, reducing but not removing the harm to the listed buildings. The application is considered to provide a clear public benefit in the creation of employment, the part closure of Verney Road and the delivery of the aspirations of the Old Kent Road AAP. In this instance the public benefits of the scheme are considered to outweigh the less than substantial harm created to these heritage assets.

Livesey conservation area and former Camberwell public library and Livesey museum (grade II)

111. The Livesey conservation area is located on the south side of the Old Kent Road at 650-672 Old Kent Road and the Camberwell Library (now Livesey Museum) and Christ Church. The site is in the wider industrial setting of the conservation area which includes Old Kent Road and the suburban dwellings.
112. The significance of the conservation area is as a good example of high-quality working-class tenement housing above shops in fine terraces with largely intact original detailing, materials and architecture. The conservation area also includes landmark buildings and architectural set pieces of the Camberwell Library (now Livesey Museum) and Christ Church on Old Kent Road. The principle setting of the conservation area and the grade II listed building is the Old Kent Road and its character as a historic primary thoroughfare dating from the Roman period, with this particular part of the conservation area retaining examples of Victorian development associated with the 19th century incarnation of the street.
113. The wider industrial areas to the north are associated with the canal and its proximity with the Old Kent Road in terms of logistics, engineering and commerce. The tenants in the flats would have worked in the industrial and canal areas, worshipped in the church and used the library. These industrial areas including the site form part of the wider setting of the conservation area.
114. The proposals bulk would be appreciated from the Old Kent Road; however, it would form part of a back drop of other industrial buildings and taller consented applications. The principal views of the conservation area would remain intact, and although there would be some change to the wider skyline when looking out of the conservation area, there would be no harm to the area's significance. This would comply with P20 Conservation areas and complies with para 203 of the NPPF.

Gasholder No 13 Old Kent Road former gasworks (grade II)

115. The grade II listed gasholder lies approx. 400m southeast of the site. It is the last remaining gasholder of the South Metropolitan Gas Company and was built by their notable principle, George Livesey a pioneer of gas during the early to

mid-Victorian era. Livesey grew up in Canal Cottages and the museum and library on Old Kent Road is named after him. Gasholder No 13 at Old Kent Road is a rare survival of a technologically and historically important development which influenced later design not just in England but worldwide.

116. The industrial setting contributes to the asset's significance, as does Canal Grove cottages, and the Old Kent Road itself. There are some particularly tangible views in an around the area that show the intervisibility between the gasholder, the Old Kent Road and Canal Grove Cottages. While some of this Victorian industrial landscape has been eroded through the loss of the canal and extensive change of the Victorian warehouse, logistics and gas holder buildings, the area remains clearly industrial in character.
117. The proposed development may be glimpsed in views from the gasholder, and from views from Verney Road where both the development and the gasholder would be visible. However, these views are not significant and the proposed development would have a neutral impact on the setting of the gasholder.
118. It is considered that the development would lead to less than substantial harm to the significance of a designated heritage asset. Nonetheless, this harm being weighed against the public benefits of the proposal including, the regeneration of an underused low density industrial site to provide a state-of-the-art last mile logistics development delivering an optimum viable commercial use to provide some 400+ jobs in the area in a sustainable manner. In this instance those benefits are considered to outweigh the harm.

Archaeology

119. The site is located within the 'North Southwark and Roman Roads' Tier 1 Archaeological Priority Area (APA), which is designed to protect the palaeological environment and prehistoric archaeology recovered from the shoreline and relict fills of the large Late Glacial Bermondsey Lake and the associated riverine geology and topology.
120. 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.
121. The applicants have submitted a desk-based assessment that includes an unreasonably large search area, as there was no consultation before the production of the desk-based assessment. This has meant the desk-based assessment has not understood the archaeological significance of the area and has not understood the prehistoric potential of the site. The site is located within an area of significant geo-archaeological interest. Had the applicant's archaeologist undertaken any consultation in advance of their desk-based assessment the significant archaeology in the area would have been pointed out to them, and much of the desk-based work that will have to be secured by condition will have to be undertaken after determination of the application. There have been a number of geo-archaeological assessments within the surrounding area where the data should be incorporated to add to a geo-

archaeological model for this site. There is also nationally significant archaeology within the search area that was missed by the applicant's archaeologists. There are two bronze-age and earlier timber platforms/ trackways within their search area. These have not been detected in the analysis of HER data. As a first stage of any work post-determination the applicant's archaeologists should undertake a collation of geo-archaeological and other borehole data from surrounding sites to produce a model of the geo-archaeological topography of the underlying site. This should be informed by a programme of boreholes and archaeological trenching to inform any further work. The site also contains a noted art pottery site, the Canal Pottery. Examples of the work of this pottery are in the Victoria and Albert Museum collection. The site is worthy of evaluation and potentially further excavation depending upon survival. Should you be minded to grant consent for this application the following conditions should be applied to ensure compliance with local and national planning policy.

122. The conditions are to cover archaeological evaluation (pre-commencement); archaeological mitigation (pre-commencement); foundation and basement design (pre-commencement); archaeological reporting (1-year post-completion of archaeological work). There is also a requirement for a financial contribution for archaeological monitoring within the planning obligations package to mitigate the impacts of the development.

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

123. 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.

Outlook and privacy

124. 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.
125. The subject site is opposite the mixed-use Bermondsey Works development (BW) which largely comprises a primary school and residential properties above. The primary frontage of BW is onto Rotherhithe New Road with its rear elevation facing Verney Road. The John Keats primary school within BW has its playground facing Verney Road with secure, well established site boundary enclosures that are approximately 2 metres height preventing passers-by looking directly into the playground area. The development proposal is separated from the BW ground floor site boundary by the width of the Verney Road highway plus the slight setback of the development's building footprint resulting in a minimum distance of 14.5 metres. In regard to the upper floor residential properties and main school building the development proposal would have a minimum distance of 20 metres and have translucent glazing

which will not permit views out of the building in its northern elevation facing BW. The second-floor terrace facing BW would be setback by a further 4.5 metres (minimum) resulting in a minimum distance of 24.5 metres between the buildings. There would be no use of the roof level as an amenity space for users of the development. It is proposed to add a condition regarding to its use to ensure neighbourly use of the amenity area. As such, the application would comply with the Council's adopted standards as set out in Southwark's SPD.

Daylight and sunlight

126. The Building Research Establishment (BRE) Guidelines set out a series of assessments to determine whether a Proposed Development is likely to have a noticeable impact upon neighbouring daylight and sunlight amenity. They provide numerical guidelines against which the differential in daylight/sunlight levels can be measured.

127. These are summarised as follows:

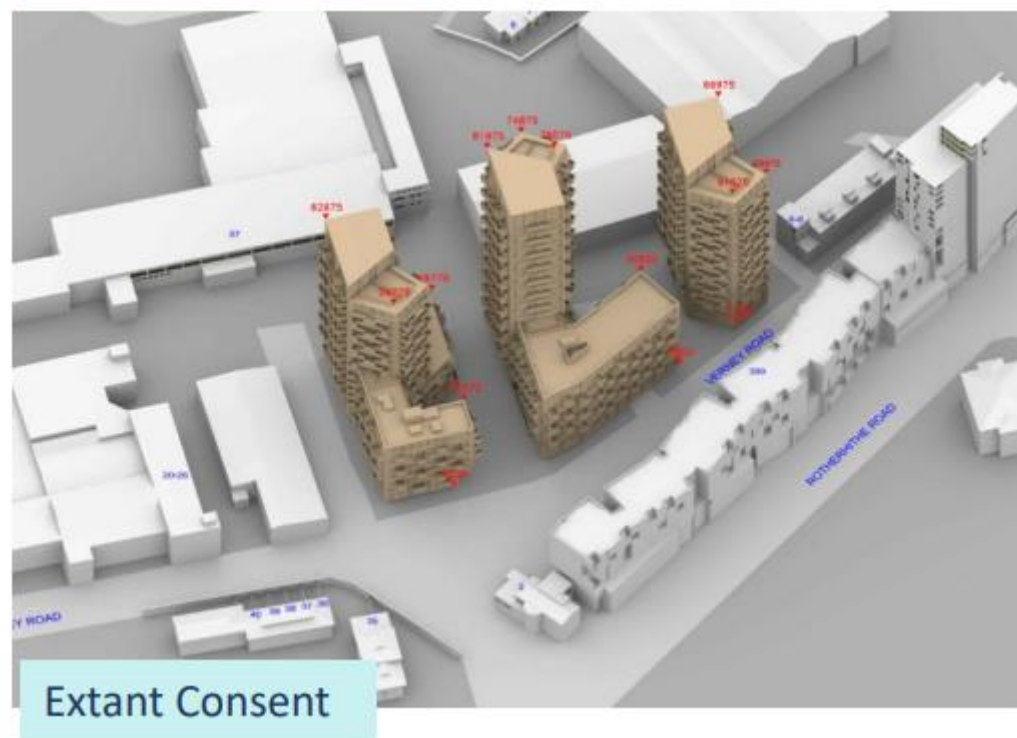
Vertical Sky Component (VSC) – This is the measure of the view of available sky from the centre of a window. The BRE guidelines advise that if a window receives 27% VSC then it should continue to receive sufficient daylight, irrespective of alteration. If the window experiences a reduction in VSC of 20% or more, then this is likely to be noticeable. A few key contextual considerations include the fact that the BRE is predicated on a suburban housing model, so must be applied flexibly in more urban environments, particularly growth and opportunity areas. It is also widely acknowledged that lower retained VSC levels are generally acceptable in urban locations, where it is not possible to achieve the 27% VSC level due to the built-up nature of urban environments.

128. No-Sky-Line (NSL) – This is the measure of where sky is visible from within a room, at working plane level (desktop height). The BRE advise that if the NSL is reduced by 20% or more, then the change in daylight is likely to become noticeable. Again, key contextual factors to consider include the BRE's acknowledgment that NSL to bedrooms is less important, and rooms lit from one side and greater than 5m deep may experience larger, unavoidable changes in daylight distribution. The NSL test is not a test of adequacy, rather simply the ability to see some sky within the room.

129. Annual Probable Sunlight Hours (APSH) – This is the measure of sunlight availability from the centre of a window. The test assesses the amount of sunlight availability reaching a room, and the focus is on main living rooms. Kitchens and bedrooms are not required to be analysed. The guidelines recommend that living rooms should receive at least 25% APSH annually, with 5% available during the winter months. If a room does not achieve these levels and experiences a reduction in APSH of more than 20%, then this is likely to appear noticeable. Key contextual factors include the limiting effect that balconies/overhangs and recessed windows have on both daylight and sunlight availability.

130. The original and amended application proposals were supported by an accompanying daylight/sunlight assessment report. A key consideration for the assessment is the extant February 2022 approved mixed-use residential led scheme that comprised three towers (approximately 63m, 67m and 82m in height).

131. The approach taken by the reports have been to initially undertake detailed Daylight, Sunlight and Overshadowing assessments in accordance with the BRE Guidelines, comparing the current site conditions with those as proposed by the Submitted Scheme. Whilst the assessments primarily focused on how the daylight/sunlight effects compare to the BRE numerical targets, a second supplementary assessment also looked at the retained levels and assessed whether they exceed the typical levels of daylight that are commensurate with more urban locations and opportunity areas: the approach has been used by both the Council and the Greater London Authority (GLA) to interrogate retained absolute levels of daylight potential in Growth and Opportunity Areas and has been used as a basis to inform the analysis and evaluation of what are acceptable daylight levels in the context of the Old Kent Road Opportunity Area (OKROA). It is an approach that was considered acceptable in respect of the Extant Consent. The Reports further undertook a comparison against the effects of the Extant Consent to determine whether there would be any noticeable additional effects identified beyond those already deemed acceptable.



132. The Reports recognise that the application proposal will inevitably give rise to some reductions in daylight and sunlight to some neighbouring properties surrounding the Site, particularly given the current low rise site conditions. In respect of the nearby Bermondsey Works there is a good rate of compliance against the BRE recommendations, and most windows retain a VSC that should be considered acceptable for an opportunity area in Central London. Virtually all of the windows that fall below the targets identified in the guidance are heavily self-obstructed, making them more susceptible to larger relative alterations. There would be an excellent rate of sunlight compliance across the building, for both annual and winter sun.

133. Elsewhere around the site, the effects are less noticeable, and the comparison against the Consented Scheme demonstrates that the overwhelming majority would either experience improved levels of retained daylight and sunlight by comparison to the position where that scheme were developed out, or no further change.
134. Where there are some further alterations recorded, these are isolated in number and generally occur in respect of NSL to bedrooms, which the BRE guidelines acknowledge are less important. Any further effects resulting in VSC reductions are fractional in absolute terms and unlikely to be perceptible.
135. The overshadowing assessments have shown that whilst there will be some overshadowing of the school playground areas in March, there will be very good levels of sunlight availability in the summer months. In addition, the Proposed Development generally gives rise to improved sunlight availability by comparison to the Consented Scheme, particularly the main playground areas which will be the most actively used spaces during the day by the school pupils.
136. Overall, it is considered that whilst there will be some inevitable reductions in the levels of daylight and sunlight amenity currently enjoyed by the surrounding residential properties, this is an inevitable consequence of any meaningful form of development on this currently low-rise industrial site which optimises its use. The resultant levels of daylight and sunlight with the Proposed Development in place are commensurate with other Growth and Opportunity Areas across London, whilst the comparison with the Consented Scheme for the site clearly demonstrates that the vast majority of neighbouring windows and rooms would either experience an improved level of retained daylight and sunlight by comparison to the position where that scheme is developed out.

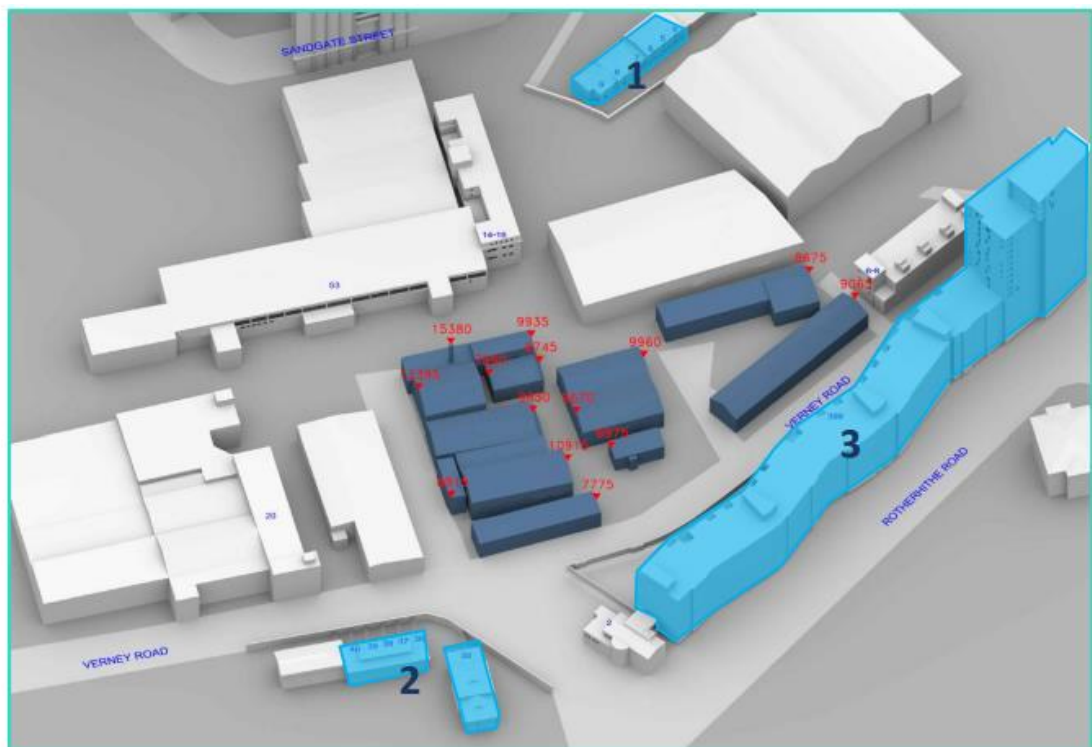
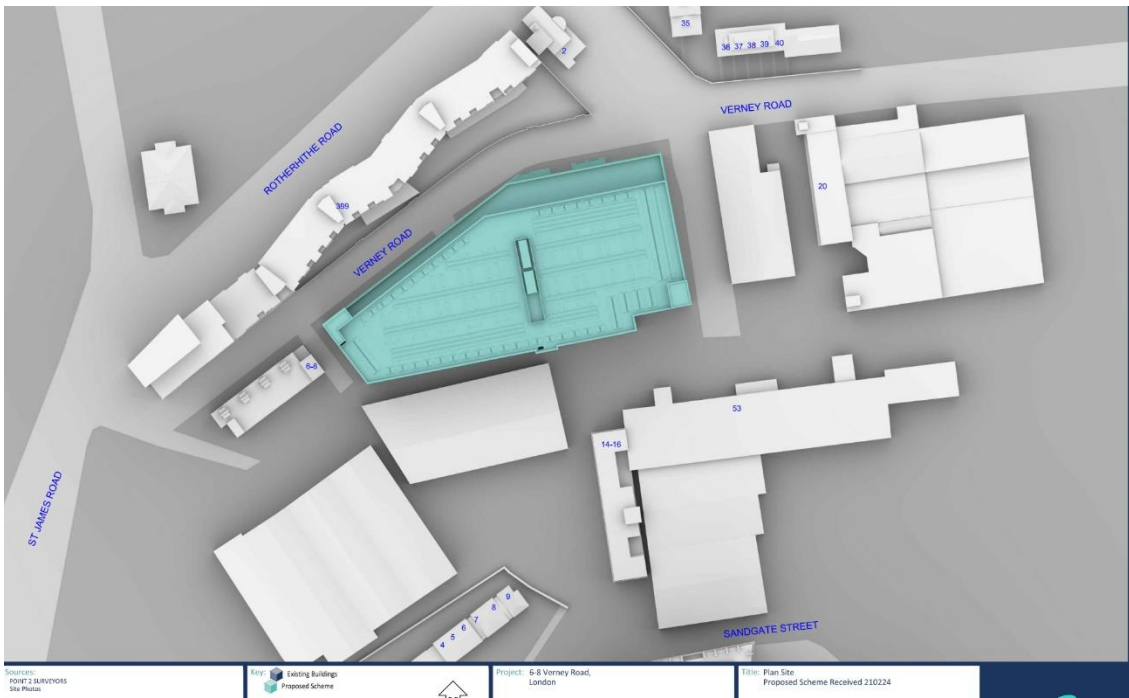
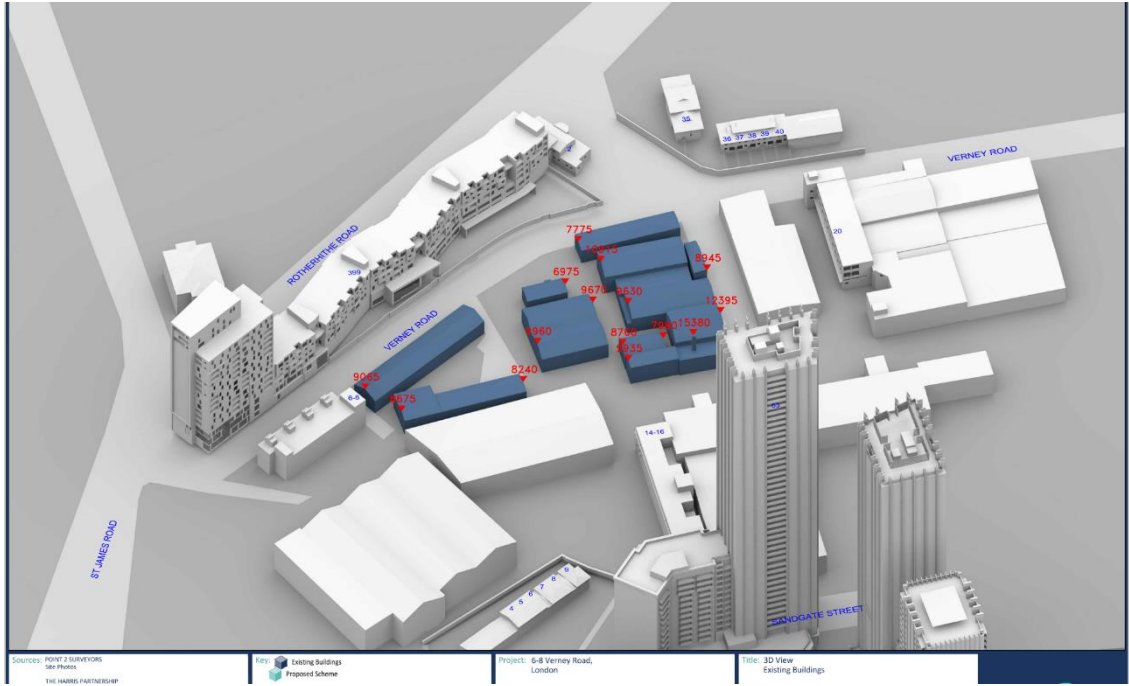
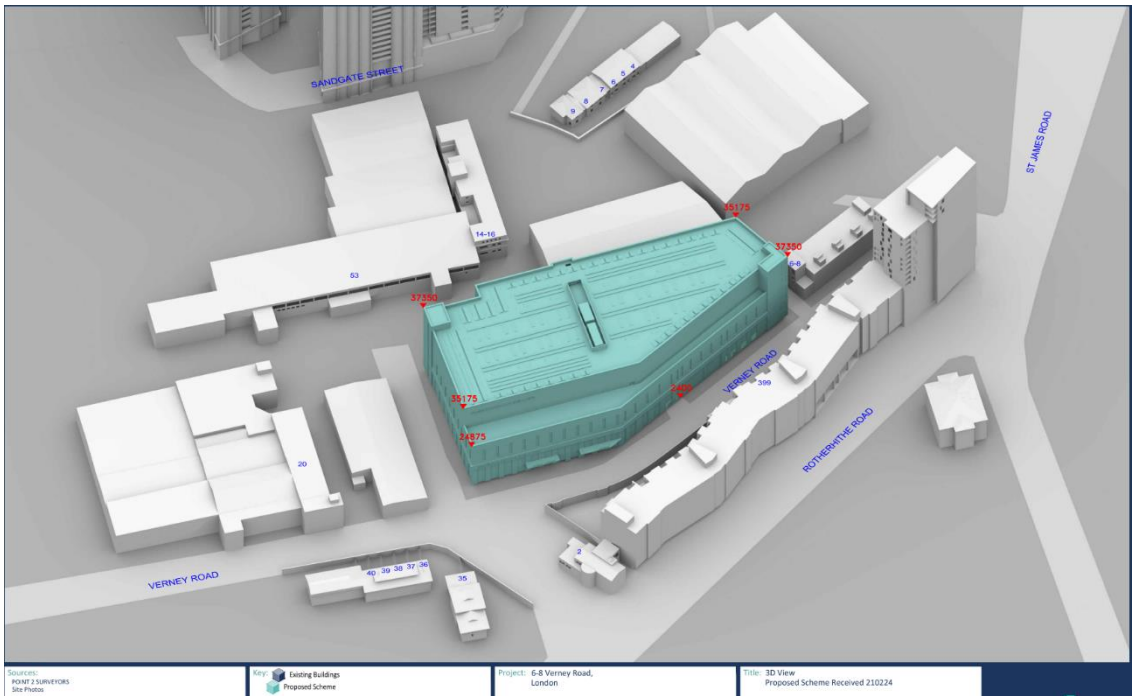
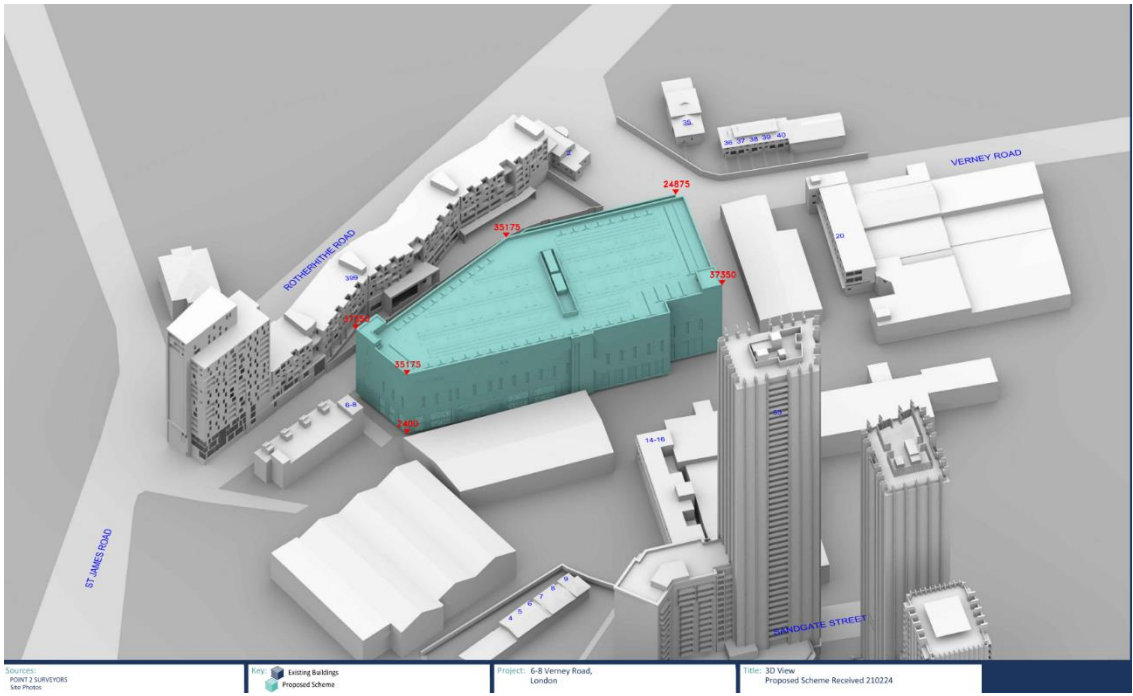


Figure 1: 3D View of Existing Site (site indicated with buildings in dark blue)





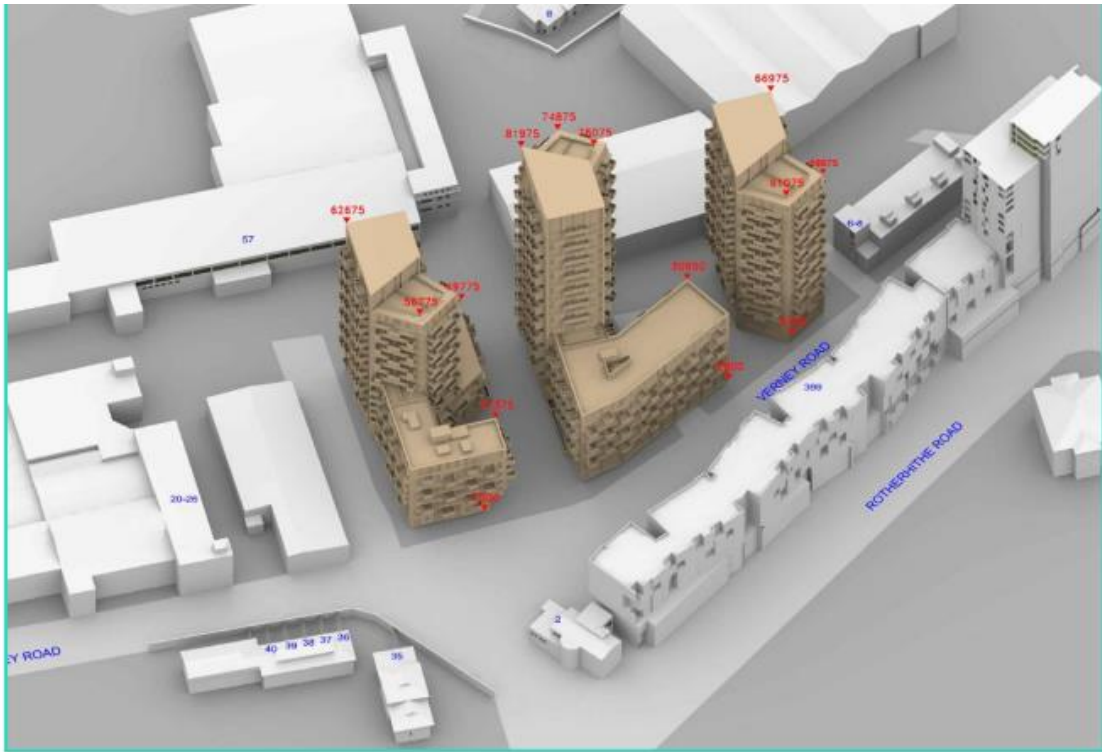


Figure 3: 3D View of Consented Scheme

137. Tables showing Bermondsey Works – BRE Compliance Summary

School Accommodation:

Daylight Test	No. of Windows Tested	No. Meet BRE Target	20-29% Relative Reduction	30-39% Relative Reduction	>40% Relative Reduction	No. meeting BRE or retaining in excess of 15% VSC
VSC	55	26 (47%)	4	9	16	46 (84%)

Daylight Test	No. of Rooms Tested	No. Meet BRE Target	20-29% Relative Reduction	30-39% Relative Reduction	>40% Relative Reduction
NSL	26	19 (73%)	3	1	3

Sunlight Test	No. of Rooms Tested	No. Meet BRE Target	20-29% Relative Reduction	30-39% Relative Reduction	>40% Relative Reduction
Total APSH	26	24 (92%)	0	0	2
Winter APSH	26	18 (69%)	0	0	8

138. Tables showing Bermondsey Works – BRE Compliance Summary

Residential Accommodation:

Daylight Test	No. of Windows Tested	No. Meet BRE Target	20-29% Relative Reduction	30-39% Relative Reduction	>40% Relative Reduction	No. meeting BRE or retaining in excess of 15% VSC
VSC	385	252 (65%)	41	36	56	341 (89%)

Daylight Test	No. of Rooms Tested	No. Meet BRE Target	20-29% Relative Reduction	30-39% Relative Reduction	>40% Relative Reduction
NSL	250	164 (66%)	15	13	58

Sunlight Test	No. of Rooms Tested	No. Meet BRE Target	20-29% Relative Reduction	30-39% Relative Reduction	>40% Relative Reduction
Total APSH	237	229 (97%)	1	2	5
Winter APSH	237	224 (95%)	0	0	13

139. Tables showing Bermondsey Works – Extant scheme

Daylight Test	No. of Windows Tested	No. Meet BRE Target or retain VSC of 15%	No. retain better VSC or no worse than Consented Scheme	No. do not meet BRE/alternative target or experience reduction beyond Consented Scheme
VSC	440	387 (88%)	29 (416 [95%] meet BRE/ATV/Consent)	24 (5%)

140. The above summary table illustrates where there are any noticeable differences between the VSC results derived from the Submitted Scheme by comparison to the Extant Consent. The majority of the windows tested (95%) will either meet the BRE/alternative target or experience a better retained VSC or no greater reduction beyond the Extant Consent.

141.

Daylight Test	No. of Rooms Tested	No. Meet BRE Target	No. retain better NSL or no worse than Consented Scheme	No. do not meet BRE or experience reduction beyond Consented Scheme
NSL	276	183 (66%)	62 (245 [89%] meet BRE/Consent)	31 (11%)

142. The above summary table illustrates where there are any noticeable differences between the NSL results derived from the Submitted Scheme by comparison to the Extant Consent. A total of 245 rooms (89%) will either meet the BRE guideline recommendations or experience a better retained daylight area (or no worse) than the Extant Consent. There will be 31 rooms that experience a further reduction in NSL, however the difference between the Submitted Scheme and the Extant Consent is between 0.16% and 7.72% (average of 1.4%).

143.

Sunlight Test	No. of Rooms Tested	No. Meet BRE Target	No. retain better APSH or no worse than Consented Scheme	No. do not meet BRE or experience reduction beyond Consented Scheme
Total APSH	263	253 (96%)	9 (262 [99%] meet BRE /Consent)	1
Winter APSH	263	242 (92%)	21 (263 [100%] meet BRE/consent)	0

144. The above summary table illustrates where there are any noticeable differences between the NSL results derived from the Submitted Scheme by comparison to the Extant Consent. A total of 245 rooms (89%) will either meet the BRE guideline recommendations or experience a better retained daylight area (or no worse) than the Extant Consent. There will be 31 rooms that experience a further reduction in NSL, however the difference between the Submitted Scheme and the Extant Consent is between 0.16% and 7.72% (average of 1.4%).

145. Officers have reviewed the submitted documents and accept the reports' conclusion that the daylight and sunlight effects of the Proposed Development should be considered acceptable and accord with the BRE guidelines for development and the relevant development plan policies that seek to encourage beneficial development that does not have an adverse impact on adjoining and neighbouring residential accommodation.

Overshadowing of amenity spaces

146. The BRE advises that open spaces should receive at least 2 hours of direct sunlight to over 50% of their area on 21 March (Spring Equinox) in order to feel sufficiently sunlight throughout the year. Alterations in direct sunlight beyond 20% are likely to become noticeable.

147.

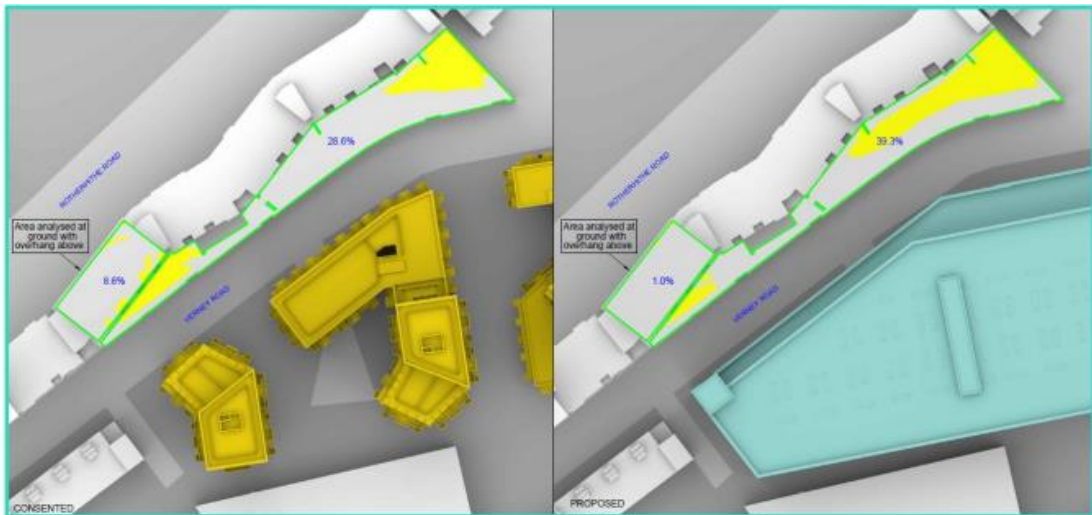


Figure 4: Comparative March 21st Sun on Ground analysis

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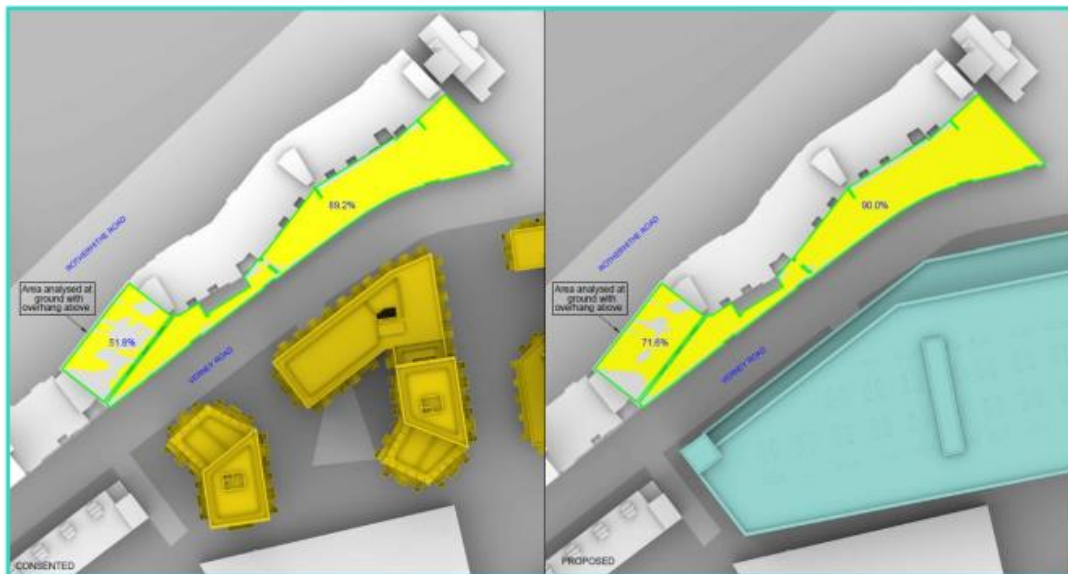


Figure 5 – Comparative June 21st Sun on Ground analysis

149. An overshadowing assessment of the school playground areas has also been undertaken in accordance with the BRE two-hour sun on ground test. The analysis indicates that whilst there will be some reductions in the direct sunlight reaching the playground areas on 21 March (Spring Equinox), the main playground space will perform more favourably than the Extant Consent, as illustrated on the comparative images above.

150. The same overshadowing assessment has been undertaken on 21 June, which shows that virtually all of the school playground areas will have access to good sunlight availability, and the Submitted Scheme allows for greater levels of direct sunlight to reach the playground than the Extant Consent. Transient shadow studies were also submitted with the planning application that indicated overall there will be increased periods of direct sunshine on the playground areas by comparison to the Extant Consent.

151. Officers have reviewed the submitted documents and accept the reports' conclusion that the overshadowing effects of the Proposed Development should be considered acceptable and accord with the BRE guidelines for development and the relevant development plan policies that seek to encourage beneficial development that does not have an adverse impact on adjoining and neighbouring residential accommodation and also the use of the neighbouring school playground.

Noise and vibration

152. EPT officers have reviewed the noise assessment from Sandy Brown Ltd Acoustic, noise and vibration consultants ref 22492-R02-D dated 28 March 2023. The assessment established the baseline noise level that will inform the development phase and noise levels. The key driver for the acoustic design of the scheme is the location of the residential dwellings at 399 Rotherhithe New Road to ensure that they are protected from both noise from industrial operations in the logistics hub and any new building services and plant. Suitable acoustic treatments shall be used to ensure compliance with the above standard. In addition, two conditions are imposed in the decision notice for Background, Rating and Specific Sound levels to be calculated fully in accordance with the methodology of BS4142:2014+A1:2019; and for compliance with the submitted and approved acoustic report. There is also a condition which relates to noise and vibration proposed to cover the construction environmental management plan.

Agent of change

153. 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.
154. As previously mentioned in this report, the closest residential receptors are at 399 Rotherhithe New Road, located opposite to the development when construction is completed. The methodology recommended in the noise section of this report above is required to be undertaken when assessing and mitigating any potential impacts on those properties and existing commercial occupiers neighbouring the site.
155. It is therefore considered that the subject scheme will not harm the operation of the existing neighbouring businesses and will mitigate any noise generated through the uses through the design of the scheme and thereby complies with London Plan Policy D13.

Transport and highways

156. 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.
157. 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 support these plans being delivered by providing a contribution toward the closure of Verney Road between the proposed 6-12 Verney Road vehicle site access, and the current access to the GP surgery at the eastern end of Verney Road close to Verney Way. This will allow for a pedestrian priority area, with no vehicle access, outside of many of the entrances to John Keats Primary School. The outline proposals have been discussed with the school, and we will continue to work closely with them as this scheme develops.
158. Southwark has recently adopted its Streets for People strategy, 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 this strategy.
159. The Mayors Transport Strategy (MTS) includes three strategic challenges that are of significant importance to assessing this application. Vision Zero, Healthy Streets, and Air Quality.
160. The submitted Transport Assessment (TA) is considered to provide an adequate appraisal of the relevant transport and highway related matters including an assessment of the potential for journeys to be made by sustainable modes of transport as well as detailed estimates of vehicular trips resulting from this development of this use class.
161. 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 to access the applicant site 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

Site layout

162. The proposed future site layout fully utilises the site and keeps it secure, which reflects the land use proposed. The existing public access routes and footways are unaffected by the proposal, and employees and visitors who arrive on foot and bicycle will benefit from direct access to the site from Verney Road. Vehicle access to the site is retained as existing to the north from

Verney Road, with the scheme designed with the potential to swap the access point into the site from the north side onto Verney Road, onto New Verney Road which is a proposed new street within the OKRD AAP Area 13. Once this new street is delivered, which this scheme adequately considers in its southern boundary design, the on-site servicing and delivery yard will become directly accessible from this new street; moving all HGVs, LGVs and Cargo Bikes away from the existing Verney Road including John Keats Primary School. Access for all vehicles, cargo bikes, and employees is gained from the Verney Road access in the interim, with vehicles approaching and leaving the site toward St James Road.

163. Consideration of the Verney Road frontage and how this aligns with the existing public highway will be integral to the success of the S278 Agreement. All works within the extent of the S278 for Southwark will be done in accordance with Southwark Street Design Manual (SSDM) and TfL's Healthy Streets design guidance. A condition requirement for the detailed design of the landscaping and public realm will ensure secure by design and road safety is fully considered, including how the visitor cycle spaces which are proposed within the site's private realm meet with requirements for design and layout.
164. The applicant has agreed to a S106 contribution of £200,000.00 to support the closure of Verney Road to traffic, from a point to the east side of their proposed vehicular site access, extending to the east toward to a point adjacent to the existing GP practice vehicular site access. This ensures that all essential vehicle access can be retained to all sites within the area, whilst creating a new large pedestrian priority area which would be landscaped outside of a number of John Keats School entry and exit gates to/from the playground area, delivering one of the key AAP plan aspirations.

Trip generation

165. The existing site is an industrial / commercial use with open compound. Since this has been out of use for some time, there is very little traffic arriving at and departing during the AM (7-9) and PM (4-6) peak period. The proposed development is estimated to generate the following daily trips, which are different depending on the potential end-users of the employment space proposed. The likely mix may be somewhere between the two figures provided below:

137 staff arrivals via various modes, with 127 departures of cargo bikes and LGVs during the Expected AM Peak Period 8-9am.

8 staff departures and 127 arrivals of cargo bikes and LGVs during the Expected PM Peak Period of 5-6pm.

It should be noted that there will be an estimated reduction in HGV arrivals during the AM Peak Period of -3 and also an expected reduction in HGV arrivals.

Servicing and deliveries

166. It has been agreed with the applicant that an Operational Management Plan is more suitable for this specific site, and as such this will be the approach to cover all elements of Servicing, Deliveries, and general operation of the site.
167. 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 & Servicing Plan Bond against their baseline figures for all daily servicing and delivery trips. This contribution will be secured through the S106 Agreement.
168. The use proposed in the development will be subject to a condition of a Travel Plan. Marketing and promotional material for this site will ensure that future occupiers are aware of how the development has been designed to discourage private cars and encourage sustainable working and visiting.

Car parking

169. Car parking within the site is limited to operational parking and to one blue badge parking space for employees with a blue badge. Operational parking includes the following:
 - 4 Van / LGV spaces;
 - 5 Van loading docks;
 - 4 HGV loading docks;
 - Cargo Bicycle loading can be facilitated within this service yard in the LGV bays, or within individual units themselves on the upper floors, accessed via Cargo Bike lifts.
170. Parking facilities in the area around the site are limited due to controlled parking regulations, School 'Zig-Zag' markings, and the need to keep Verney Road open and accessible for vehicles of all sizes. The site will be located within one of the extended London Borough of Southwark's Controlled Parking Zones where regulations are likely to apply from Monday to Friday from 08:00 to 18:30. Other than the aforementioned parking, the site itself will be car-parking free and this will be secured in the s106.
171. A S106 obligation that prevents future tenants of the proposed development from obtaining resident or business parking permits for any existing or proposed CPZs has been agreed.

Public Transport

172. The site has a number of bus stops nearby, including those on Rotherhithe New Road which serve the 381 / N381, and bus stops on the Old Kent Road which provide frequent services to numerous destinations in LB Southwark, LB Lewisham and others.

Active transport

Walking and public realm

173. The application provides for a closure of a part of Verney Road that is not required for the vehicular network to work within this area, creating a new pedestrian focused space outside of John Keats Primary School, which is part funded by the aforementioned developer S106 contribution.

Cycle parking and cycling facilities

174. Cycleway 10 can be found approximately 500m to the north of the cycle store entrance on Verney Road. The route runs from Deptford to Southbank. The site is also in close proximity to Cycleway 35 which is located to the west and connects cyclists to Peckham Town Centre.
175. Cycle Parking has been secured for both long-stay staff working at the site, and short-stay for visitors to the site.
176. A total of 142 spaces are provided securely, with direct access from the service yard area and vehicle access from Verney Way, whilst also providing access into the various units / floors within the building itself. These spaces are designed to LCDS, London Plan and Southwark Plan requirements.
177. Visitor cycle parking is provided on the Verney Road frontage which is fully publicly accessible, in an area to the east of the building line along Verney Way, accessed from Verney Road, and also within the service yard area.

178.

Land Use	GEA (sqm)	London Plan Standards		Provision	
		Long stay	Short stay	Long stay	Short stay
E(g) (Office)	531	1 space per 75sqm (GEA)	1 space per 500sqm (GEA)	7	1
B2/B8 (General Industrial, Storage or Distribution)	23,555 (NI service yard)	1 space per 500sqm (GEA)	1 space per 1,000sqm (GEA)	135	25

Construction

179. A Draft Construction Logistics Plan has been prepared as a standalone document submitted along with this application. The S106 Agreement would secure detailed Demolition Environmental Management Plan (DEMP) and a Construction and Environmental Management Plan (CEMP). This is to enable the Council to manage cumulative impacts on the highways and environment.

Conclusion on Transport

180. The proposal is supported as it is designed as a last-mile logistics hub that can support the operation of zero-emission delivery fleets such as electric motorised vehicles and cargo bicycles and supports an intensification of use of an employment site within a suitable location, with limited impacts over and above the permitted use of the site.
181. The applicant will be making contributions toward improving the local sustainable transport network to provide more space for pedestrians outside of John Keats Primary School, and to divert traffic away from this area which is subject to congestion at school start / end times at present. This will support Streets for People and Southwark Plan objectives. It can help to reduce car dependency which will contribute to the efforts against climate change and to the delivery of some of the Movement Plans 9 missions. In particular, these include Vision Zero and Healthy Streets, and allows for the emerging plans for the surrounding public highway to be facilitated subject to the adherence to the S106 obligations and planning conditions mentioned in this section of the report.

Environmental matters

Water resources

182. Policy P68 (Reducing flood risk) of the Southwark Plan states that development must be designed to be safe and resilient to flooding and finished floor levels are set no lower than 300mm above the predicted maximum water level where they are located within an area at risk of flooding. Additionally, major development is required to reduce surface water run-off to green field run-off rates, and this must be through the application of water sensitive urban design and SuDS.
183. 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 1000 (0.1%) chance in any year. The Environment Agency's (EA) most recent flood modelling (December 2017) shows that the site is not at risk if there were to be a breach in the defences. The EA considers that the application development will be at low risk of flooding as it relates to tidal and/or fluvial flood risks. The EA recommend that flood resistant and resilient measures are incorporated into the design and construction of the development proposals.
184. The submitted FRA proposes a number of mitigation measures, including the use of blue and green roofs, flood resistant materials and designs and specific groundwater measures. These mitigation measures have been factored into the design considerations of the scheme. The Council's Flood Risk Officer raised no objections to the information provided within the final FRA and recommends the imposition of conditions (Maintenance of SUDs; further details of the drainage strategy and a drainage verification report).

Sustainable urban drainage

- 185.
- Blue roofs of approximately 5111sqm.
 - Permeable paving to the external areas 716sqm.



186. The scheme is considered to be acceptable subject to conditions for a detailed drainage strategy (pre-commencement) and a drainage strategy verification (pre-occupation).

Land contamination

187. Environmental Protection Team (EPT) officers have reviewed the Ground Investigation report dated March 2023 as prepared by Soiltechnics. The Report identifies that the site has historically been occupied by industry including a pottery works, hair & felt works, boat repairing yard and incinerator engineering works. Several above ground and below ground tanks have been present historically however none are noted on site in the present day. A historical landfill, associated with the infilled Surrey Canal, is located just beyond the southern boundary of the Site. The report recommends that based on the depth of Made Ground beneath the Site and proposed loadings associated with the new building then a piled foundation and/or ground improvement will be required to support the building structure and floor slabs. It further recommends that on the basis of the deep made ground that the use of traditional soakaways or deep-bored soakaways for the disposal of surface water is not

recommended and consideration should be given to other drainage solutions.

188. The report states that potential risks from contamination to human health have been identified however, most of the Site is to be covered in hardstanding which will effectively break the source/pathway/receptor linkage. Very limited areas of soft landscaping areas are shown as part of the development and remedial measures will be required in these areas, potentially in the form of a clean imported cover system. Following cessation of potential sources of contamination on site, and as the Site will be covered in hardstanding (limiting infiltration potential) the risk to controlled waters from residual ground conditions is considered to be low. A watching brief is recommended during demolition works and appropriate removal/decommissioning of any tanks/interceptors/pipework and any associated significant contamination (if/where encountered). Elevated ground gases (methane) have been recorded and a designation of CS-2 has been assigned to the Site. Ground gas protection measures are recommended in new buildings. Further monitoring may enable refinement of this assessment.
189. The report concludes that a detailed Remediation Strategy (to inform future contractors of specification of remedial requirements) and subsequent Verification Report will be required. In the absence of further monitoring or refinement of the gas risk assessment, a detailed Gas Protection Design report and subsequent verification of the installation of gas protection measures will be required. A Discovery Strategy to deal with unexpected contamination (particularly associated with the underground petrol tank identified on historical mapping between 1950-1970 only) will be required during the development works. A detailed UXO desk study to support the whole construction phase is recommended. A Materials Management Plan to facilitate the reuse of Made Ground materials on site (if required) is recommended.
190. The council's EPT accepts the Report's findings and suggested mitigations and recommends the imposition of a suitable condition for the remediation for the site.

Air quality

191. The subject site is located within the Southwark Air Quality Management Area which is designated for the potential exceedance of the annual mean nitrogen dioxide (NO₂) and daily mean PM₁₀ air quality objectives. Southwark Plan Policy P65 'Improving air quality', states that development should address the impacts of poor air quality on building occupiers and public realm users by reducing exposure to and mitigating the effects of poor air quality. An Air Quality Assessment (AQA) has been submitted with the application, which considers the air quality impacts arising from the construction and operational use of the development, taking into account all relevant local and national guidance and regulations.
192. The AQA advises that with regards to sensitive receptors, locations where people or wildlife may be adversely affected by changes in air quality or dust soiling are considered as relevant receptors for air quality. Receptors introduced by the proposed development are also relevant. There are a number

of residential/schools receptors in the vicinity which could be affected by changes in air quality arising from construction and demolition activities associated with the development. Commercial and industrial premises in the area will also be sensitive to dust. No ecological receptors have been identified within 50m of the development site have therefore been scoped out of the assessment.

193. The AQA concludes that the magnitude of change for annual mean NO₂, PM₁₀ and PM₂₅ concentrations at all receptors is predicted to be negligible and therefore the overall effect is not significant. AQOs are currently being met at the development site and are expected to continue to be met. Based on the findings of the report EPT officers will not recommend any mitigation methods for the premises and its uses. However, the air quality control will be managed during the construction phase by implementing an effective environmental construction management plan.

Wind and microclimate

194. 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 is a single building mass, 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.

Energy and sustainability

195. 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.
196. 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 non-residential developments must reduce carbon emissions by at least 40% on 2013 Building Regulations. Southwark Council's carbon offset cost is £95 for every tonne of carbon dioxide emitted per year over a period of 30 years. This is the equivalent of £2,850 per tonne of annual residual carbon dioxide emissions.
197. An Energy Assessment and Sustainability Strategy based on the Mayor's 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, P70 of the Southwark Plan 2022, and the Southwark Sustainable

Design and Construction SPD.

Carbon emission reduction

198. The application proposal would provide a cumulative on-site saving of 64% which would exceed the development Plan's minimum 35% carbon reduction requirement. To ensure that the 'Net Zero Carbon' target is achieved a cash-in lieu payment of £84,918 is required to offset the cumulative surplus 894 tCO₂. The carbon offset payment has been calculated based on the £95/tonne figure.

Be Lean (use less energy)

199. The development achieves a 64% reduction in overall carbon emissions over Part L 2021, through passive design and energy efficiency measures alone. The reduction will be achieved by a combination of measures, which include; significantly improved fabric 'U' values, improved air tightness, minimising cold bridging, and incorporation of an Electric Heat Pump system (Hybrid Variable Refrigerant Flow – HVRF) with heat recovery system to efficiently supply heating and cooling, Domestic Hot Water (DHW) heat pump and LED lighting with appropriate daylight dimming controls and motion sensing controls to all areas. The lighting will be designed to ensure that a level of efficiency of 110 lamp lumens per circuit-Watt is achieved.

Be Clean (supply energy efficiently)

200. The subject site is located near an existing/proposed heating network according to the London heat map network. Further investigation will need to be undertaken to establish if the scheme can connect to any of networks, including the proposed District Heating Network (DHN). In the event that a DHN heat supply connection can be obtained initial predictions are that a considerable reduction in carbon emissions will be achieved.
201. The site therefore proposes to provide spatial provision and plant for its own local building only heat network in accordance with the proposed strategy. In the event that the development is able to access a heat connection from new/existing routes, the site proposes to install a manhole outside the plantroom for future district heating pipework, which will be capped off and install the district heating infrastructure from this point into the new plantroom where the heat plate exchanger will be located. The plantroom will allow for suitable space for the required equipment that complies with relevant Guidelines documents for connecting to heat networks.

Be Green (Use low or carbon zero energy)

202. Electric heat pump systems and a heat recovery system are proposed to be used within the building and LED lighting with appropriate daylight dimming controls and motion sensors to all areas of the building. All available roof space is to be utilised for solar photovoltaics.

203. Taking into consideration the measures assessed in this section of the report, the development exceeds the minimum 35% improvement over Part L Building Regulations, achieving on site reductions of 64%.

Be Seen (Monitor and review)

Whole life cycle and carbon capture

204. London Plan Policy SI 2 (Minimising greenhouse gas emissions) part F states that “*Development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions*”. A whole life-cycle carbon emissions assessment has been provided to support the application.

Circular economy

205. London Plan Policy SI 7 (Reducing waste and supporting the circular economy) part B states that “*Referable applications should promote circular economy outcomes and aim to be net zero-waste. A Circular Economy Statement should be submitted, to demonstrate....*” A whole circular economy statement has been provided to support the application.

Overheating

206. London Plan Policy SI4 and Policy P69 of the Southwark Plan set out the cooling hierarchy that should be followed when developing a cooling strategy for new buildings. The six-step hierarchy is as follows:
- Minimise internal heat generation through energy efficient design; then
 - Reduce the amount of heat entering the building through the orientation, shading, albedo, fenestration, insulation and green roofs and walls; then
 - Manage the heat within the building through exposed internal thermal mass and high ceilings; then
 - Use passive ventilation; then
 - Use mechanical ventilation; then
 - Use active cooling systems (ensuring they are the lowest carbon options).
207. The facade has been designed to respond to environmental factors like sunlight and prevailing winds. The fabric first approach would be further enhanced by the use of low-carbon HVRF Heat Pumps with heat recovery, electric DHW heat pumps, LED lighting with appropriate controls and PIR sensors, all available roof space utilised solar photovoltaic arrays and a carbon offset payment to ensure the Net ‘Zero Carbon’ target is achieved in accordance with the London Plan Policy SI 2.

BREEAM

208. Southwark Plan Policy P69 requires developments to achieve a BREEAM rating of 'Excellent' for non-residential development and non-self-contained residential development over 500sqm. A preliminary BREEAM assessment for the Proposed Development was undertaken. The BREEAM methodology assesses development based on credits for a set of performance criteria covering issues such as energy, water, materials, waste, pollution, health and well-being, management, and ecology. The pre-assessment results demonstrate that the development is being designed to achieve a BREEAM New Construction rating of 'Excellent', in accordance with Policy P69 of the Southwark Plan.

Water efficiency

209. The design of the development will aim to minimise internal potable water consumption; maximise water efficiency and recycling a number of measures to be incorporated by the incoming tenants for the proposed development. This will be achieved through the specification of low-flow sanitary fittings such as low or dual flush toilets, low flow taps and showers and water efficient white goods. Furthermore, a water meter with a pulsed output will be installed on the mains supply to all buildings to ensure water consumption can be monitored and managed and therefore encourage reductions in water consumption. A leak detection system will also be integrated into the water metering, employing trend analysis with an audible signal when a leak is detected, to reduce the impact of water leaks that would otherwise go undetected. Lastly, an automated irrigation system will provide optimum watering for the roof planting system, with minimum water wastage. Grey water would also be utilised in the irrigation system. Providing these water efficiency measure enables the development to comply with Policy SI5 of the London Plan 2021.

Digital connectivity infrastructure

210. The NPPF recognises the need to support high-quality communications infrastructure for sustainable economic growth and to enhance the provision of local community facilities and services. To ensure London's long-term global competitiveness, Policy SI6 (Digital Connectivity Infrastructure) of the London Plan 2021 requires development proposals to:
- be equipped with sufficient ducting space for full fibre connectivity infrastructure;
 - achieve internet speeds of 1GB/s for all end users, through full fibre connectivity or an equivalent.
 - meet expected demand for mobile connectivity; and
 - avoid reducing mobile capacity in the local area.
211. A pre-commencement condition has been attached to this decision to ensure compliance with the aims and objectives of Policy SI6 in assisting London's long-term global competitiveness.

Planning obligations (S.106 agreement)

212. Southwark Plan Implementation Policy IP3 and Policy DF1 of the London Plan advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. IP3 of the Southwark Plan Aims to ensure that any potential adverse impact that makes a proposed development unacceptable will be offset is mitigated by using planning conditions in the first instance. Additionally, and where they meet the required tests, Section 106 legal agreements that either a) mitigates the impact or b) pay the council a financial contribution to enable the council to/ will be used to mitigate the impact. The NPPF which echoes the Community Infrastructure Levy Regulation 122 which requires obligations be:

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

213. 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 Training	Numbers to be agreed within a bespoke strategy due to innovative logistics hub use and multi-use. Payments required if targets not met.	Agreed
Employment	Affordable Workspace: Financial contribution to be made in-lieu 10% provision.	Figure to be Agreed
Transport and Highways		
s278 Highway works	Repave the footway fronting the site including new kerbing on Verney Road in accordance to Southwark Streetscape Design Manual (SSDM) - precast concrete slabs and 150mm wide granite kerbs. <ul style="list-style-type: none"> • Construct the proposed vehicle crossover in accordance to SSDM. • Reinstate redundant vehicle crossover as footway. • Resurface Verney Road carriageway fronting the development. • Undertake modifications to the current refuge island on Rotherhithe New Road • Upgrade the speed hump fronting the development on Verney Road to a 	Agreed

	<p>raised table.</p> <ul style="list-style-type: none"> • Upgrade street lighting fronting the development. • Apply for a TMO to amend waiting/loading restrictions and where obtained undertake works to include road markings and signage. • Rectify any damaged footways, kerbs, inspection covers and street furniture due to the construction of the development and the movement of construction vehicles. 	
A contribution towards improvements to the local cycle and pedestrian links and strategic cycle network (GLA) to and from the Site.		Agreed in principle
Contribution towards future two-way highways layout.	<p>£200k contribution toward the closure of the eastern end of Verney Road with urban realm scheme to be designed by LBS in co-ordination with BL and John Keats Primary School, between the proposed 6-12 Verney Road site access and the site access for the GP surgery on the corner of Verney Road / Verney Way. See indicative drawing: 332410749-3001- 145-P03.</p> <ul style="list-style-type: none"> • The design work for this scheme can begin once the £200k S106 contribution is agreed, and paid, to LBS. • Any additional monies required to complete the project will be funded by LBS from previous and future schemes within vicinity of the site. • Modifications to the current refuge island on Rotherhithe New Road are only required to facilitate the two-way option, so therefore are accounted for in the contribution. 	Agreed
Legible London signage system to support active travel	Financial contribution of £22,000 to provide for two new signs adjacent/near to the site and local existing sign map refresh. Contribution requested within the GLA Stage 1 report.	Agreed
Energy, Sustainability and the Environment		

Achieving net carbon zero	an off-set payment of £84,918.00.	Agreed
Archaeology monitoring/supervision fund	Contribution towards cost of providing technical archaeological support (£11,171.00 for schemes for 10,000sqm and more of development)	Agreed
Trees	A total of £16,000 for off-site planting if the tree planting strategy is not delivered	
Admin		
Legal Fees		Subject to such fees being reasonable and proper in the course of negotiating the agreement in accordance with the agreed heads of terms.
Administration fee	Maximum contribution to cover the costs of monitoring these necessary planning obligations, calculated as 2% of total sum	Agreed

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

- Marketing, allocation and fit out of the commercial units
- Servicing bay/Site management plan
- London Living Wage – best endeavours to being offered to all staff employed in the commercial units as well as workers during the construction period;
- 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
- Final Demolition and Construction Environment Management Plans;
- Agreed carbon target
- Be Seen performance
- Parking permit restriction
- Highways condition survey
- Tree Strategy
- Interim site boundary treatments to allow for public realm improvements for new Verney Road/Way
- Travel Plan compliance and monitoring
- Energy Strategy
- Appointment of workspace co-ordinator;
- Workspace Specification (including full M&E fit out);
- Triggers securing Practical Completion of workspace;

215. The S106 heads of terms agreed would satisfactorily mitigate against the adverse impacts of the proposed development.
216. In the event that a satisfactory legal agreement has not been entered into by 7 April 2025, it is recommended that the director of planning and growth refuses planning permission, if appropriate, for the following reason:

“The proposal, by failing to provide for appropriate planning obligations secured through the completion of a S106 agreement, fails to ensure adequate provision of affordable workspace and mitigation against the adverse impacts of the development through projects or contributions in accordance with Policy IP3 ‘Community infrastructure levy (CIL) and Section 106 planning obligations’ of the Southwark Plan (2022), and London Plan (2021) policy DF1 ‘Delivery of the Plan and Planning Obligations’, as well as guidance in the Council's Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015)”.

217. An S278 agreement will need to be undertaken with Southwark Highways for works to the highway, and traffic management changes. S278 Works Outline: repave footway; reinstate redundant vehicle crossovers; upgrade street lighting; repair any damage to highway due to construction activities; resurface/reconstruct Verney Road carriageway along the length of the site; pre-commencement highways conditions survey.

Mayoral and borough community infrastructure levy (CIL)

218. Section 143 of the Localism Act states that any financial contribution received as community infrastructure levy (CIL) is a material ‘local financial consideration’ in planning decisions. The requirement for payment of the Mayoral or Southwark CIL is therefore a material consideration. However, the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport invests in London as a whole, primarily Crossrail. Southwark’s CIL will provide for infrastructure that supports growth in Southwark. In this instance, based on information provided by the applicant, an estimated Mayoral CIL payment of £1,391,199.92 and a Southwark CIL payment of £NIL would be due. This figure is an estimate only, and would be calculated in more detail when CIL Additional Information and Assumption of Liability forms are submitted prior to implementation.

Other matters

219. None

Community involvement and engagement

220. The applicant’s Statement of Community Involvement sets out the details of the pre-application engagement undertaken in support of the planning application. It also provides an overview of the engagement context and approach, as well as details of comments received and the applicant’s response. The approach of the SCI to pre-submission engagement was informed by industry best practice

and Southwark Council guidance including the Statement of Community Involvement and the Development Consultation Charter. In December 2022, an Early Engagement Strategy was submitted to Southwark Council which set out the site research and context analysis, meetings, events, and public consultation methods; and ways to feedback responses during the engagement. The subsequent formally submitted SCI set out summaries of the facts based audit (stakeholder analysis and site context); the applicant's social value statement covering social, environmental, economic impacts and long-term wellbeing and resilience; a summary of the engagement activities (elected members; community groups; public consultation with in-person and online events. The SCI sets out a summary of the comments from the stakeholders and the applicant's responses.

221. The approach of the applicant's submitted SCI is considered to be acceptable and would meet the Council's guidelines for pre-application community involvement and engagement.

Consultation responses from members of the public and local groups

222. This application was subject to two rounds of formal consultation. The first round was for the original scheme (May 2023). A second round was undertaken following the submission of the minor amended plans (March 2024).
223. At the time of writing, a total of 20 consultation responses had been received from members of the public. Given that there were two rounds of consultation, most of these are from the same occupiers. There have been 15 objections and 2 in support of the proposed development and 3 neutral.
224. **Objections**
The main issues raised by residents objecting to the proposed development are set out below:
- Object to land use going back to industrial form residential and the potential for increased traffic particularly from HGVs, increased noise and air pollution and risk to school children from traffic and pollution, given the proximity of the school. Congestion at school opening and closing times. Harm to children's education. The area would be best turned into a park. The design is worse than the approved scheme. The impact on the saleability of flats.
225. **Officer comments:** The issues of highway safety, traffic generation, air quality, noise, impact on the amenities of neighbouring residents and the use of the school and its playground, the extant permission, the principle of commercial development on a site with residential led mixed-use are all dealt with in the main report under the relevant sections. The Draft OKRAAP includes a masterplan objective to deliver an open space within the sub-area OKR3 and to close the road outside the school, the application will provide a financial contribution to ensure its delivery. Officers have discussed this approach with

the Head Teacher of John Keats school who has been supportive of the proposal to close the road outside the school entrance. Issues of the saleability of local flats and the loss of a view are not relevant planning matters in assessing the merits of the subject planning application.

226. **Neutral:** Whilst overall supportive a local business located on Verney Way has asked for further engagement with the developer to ensure that their business is not adversely impacted both during the construction phase and in operation. here.
227. **Officer Comment:** the application has been amended to remove the vehicular access from Verney Way and is now directly from Verney Road, albeit here remains a masterplan objective to gain vehicular access from Verney Way at a later date with the master planning of the adjoining sites.
228. **Support:** the development would make good use of the land by having a logistics hub there which could serve the surrounding areas. It appears the plan has been well thought out to reduce any negative impact to the local community as much as possible. I like that it will provide jobs for local people; I agree with this development in Verney Road. I support the use.
229. **Officer comment:** Noted.
230. Details of consultation and re-consultation undertaken in respect of this application are set out in Appendix 4. Details of consultation responses received are set out in Appendix 5.

Consultation responses from external and statutory consultees

231. **Environment Agency (EA) comments:**
The EA has advised that it has no objection to the proposed development subject to the inclusion of conditions to cover groundwater and contaminated land; sustainable drainage and piling. On the advice of the EA, recommendations attached to this decision should also include informatives relating to flood resistance and resilience.
232. **Greater London Authority (GLA) stage 1:**
Strategic issues summary
233. **Land use principles:** The proposed industrial intensification on this LSIS is strongly supported in land use terms, in line with London Plan Policies E3, E4, E6, E7 and SD1 and Good Growth Objectives GG2 and GG5.
234. **Urban design and heritage:** Broadly supported (though further consideration of an additional setback on the two upper floors and some subtle alteration of panel colours and texture is recommended) and the proposal complies with Policy D9B and may accord with the qualitative assessment criteria set out at Policy D9C; and no harm would be caused to any nearby heritage assets or composition of protected views.
235. **Transport:** A travel plan, delivery and servicing plan, construction logistics plan

and construction management plan should all be secured by way of condition or Section 106 agreement; and, improvements to the local cycle and pedestrian links and strategic cycle network will be sought via Section 106 and/or Section 278 obligations as well as a financial contribution towards Legible London.

236. Other issues on **Sustainable development** and **Environmental issues** require additional information and/or planning conditions or obligations are required on the energy strategy, WLC assessment, FRA and circular economy statement including post-construction monitoring, a carbon off-set contribution and a Flood Warning and Evacuation Plan prior to the Mayor's decision making stage.
237. The outstanding matters as identified at Stage 1 have been subsequently agreed and suitable planning conditions and planning obligations have been added by officers to the permission and s106 to mitigate the scheme and ensure London Plan compliance.
238. **Thames Water (TW):**
In regards, to the matters of waste and water, TW has no objections to the principle of the application subject to the imposition of suitable conditions and informatives. Due to the site being within 15 metres of a strategic sewer TW requires the submission of a piling method statement; measures required to minimise groundwater discharges into the public sewer; petrol/oil interceptors to be fitted in all car parking/washing/repair facilities; in regards to surface water drainage to require the sequential approach to the disposal of surface water and to follow its guidance; the minimum water pressure of 10m head (approx. 1 bar) and a flow rate of 9 litres/minute at the point where it leaves TW pipes; and guidance how to work within 15m of TW underground assets.
239. These matters have been accepted by officers and the requested condition and informatives have been added to the permission.

Consultation responses from internal consultees

240. **Archaeology:** The Council's Archaeologist's assessment is covered in the main report dealing with archaeology.
241. **Case Officer:** Noted and conditions and planning obligation included within the permission and S106.
242. **Urban Forrester**
The Urban Forrester officer's assessment is covered in the major report dealing with trees and landscaping.
243. **Case Officer:** conditions and planning obligation included within the permission and S106.
244. **Environmental Protection**
The EPT officer's assessment are covered in the major report dealing with the relevant environmental matters.
245. **Case Officer:** conditions included within the permission.

246. **Local Economy Team**

LET is happy to support the application in general which matches the economic, job and growth plans as discussed in the planning statement and meets the land use considerations set out in the planning statement as assessed using the SLP 2022. As such, the application is supported subject to suitable clauses within a s106 agreement to cover employment and training; construction phase jobs/skills and employment requirements.

247. **Case Officer:** Noted and clauses included within the s106.

248. **Local Lead Flood Authority (LLFA)**

The LLFA has reviewed the application proposal and supports it in principle subject to conditions as summarised within the SuDs section of the main report.

Community impact and equalities assessment

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

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

251. The Public Sector Equality Duty (PSED) contained in Section 149 (1) of the Equality Act 2010 imposes a duty on public authorities to have, in the exercise of their functions, due regard to three "needs" which are central to the aims of the Act:

1. The need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act.
2. The need to advance equality of opportunity between persons sharing a relevant protected characteristic and persons who do not share it. This involves having due regard to the need to:
 - Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
 - Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it
 - Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low
3. The need to foster good relations between persons who share a relevant protected characteristic and those who do not share it. This involves having due regard, in particular, to the need to tackle prejudice and promote understanding.

252. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership. The application proposal would provide modern accessible workspace to groups who might otherwise not be able to take advantage of the employment opportunities created. The training and apprenticeship programmes would be likely to benefit young people locally the majority of whom are from BAME backgrounds. The scheme would not discriminate or create any harm to those with protected characteristics.

Human rights implications

253. 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.
254. This application has the legitimate aim of providing new 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.

Positive and proactive statement

255. The council has published its development plan and Core Strategy on its website together with advice about how applications are considered and the information that needs to be submitted to ensure timely consideration of an application. Applicants are advised that planning law requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise.
256. The council provides a pre-application advice service that is available to all applicants in order to assist applicants in formulating proposals that are in accordance with the development plan and core strategy and submissions that are in accordance with the application requirements.

257. **Positive and proactive engagement: summary table**

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

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Conclusion on planning issues

258. The major redevelopment of the site is supported and welcomed in principle. The principle of a commercial/office/studio scheme on the site is also accepted, and would be in line with policy aspirations to increase the number of employment opportunities within OKR 13.
259. The increased provision of flexible commercial and employment floorspace on along with the introduction of policy compliant Affordable Workspace within the development is considered to be a major benefit of the scheme
260. The proposed development provides one blue badge parking space and provides 168 cycling parking spaces. The stepped, setback of the upper floors of the development from the Verney Road frontage to reduce the potential impact on the Bermondsey works development opposite the site would provide a satisfactory townscape and neighbourly response. The proposed development with its sensitive and well-modulated elevations would secure improved public realm.
261. 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 cases, where the results would not satisfy the BRE Guidelines, the retained levels would be within the range considered acceptable for an urban location.
262. The architectural design is considered to be high quality and would significantly improve the site within the context of the surrounding area.
263. It is therefore recommended that planning permission be granted, subject to conditions, the timely completion of a S106 Agreement and referral to the Mayor of London.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history files: 6-12 Verney Road Application files: 23/AP/0948; 23/AP/0071 & 17/AP/4508 Southwark Local Development Framework and Development Plan Documents	Resources Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 0207 525 0254 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Recommendation (draft decision notice)
Appendix 2	Relevant planning policies
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, Planning Team Leader	
Version	Final	
Dated	26 September 2024	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director, Resources	No	No
Acting Strategic Director, Environment, Sustainability and Leisure	No	No
Strategic Director, Housing	No	No
Date final report sent to Constitutional Team		26 September 2024