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Meeting Name:	Planning Committee (Major Applications) B	
Date:	10 December 2024	
Report title:	<p>Development Management planning application: Application 23/AP/1317 for: Full Planning Permission</p> <p>Address: 257-283 Ilderton Road London Southwark SE15 1NS</p> <p>Proposal: Demolition of the existing building and mixed use redevelopment of the site comprising Purpose-Built Student Housing including associated amenity and ancillary café and cycle workshop (Use Class Sui Generis), a new self-storage facility (Use Class B8), light Industrial workspace / incubator units (Use Class E(g)(iii)) and other associated infrastructure.</p>	
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: 27.06.2023	Application Expiry Date: 26.09.2023	
Earliest Decision Date: 20.02.2024		

RECOMMENDATION

1. That full planning permission be granted for 23/AP/1317, subject to conditions, referral to the Mayor of London and the applicant entering into a satisfactory legal agreement; and
2. That environmental information be taken into account as required by Regulation 26(1) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended); and
3. That the Planning Committee, in making their decision, has due regard to the potential equalities impacts that are outlined in this report; and

4. That, in the event of requirements of paragraph 1 above not having been met by 10 June 2025 the Director of Planning and Growth be authorised to refuse planning permission for 23/AP/1317, if appropriate, for the reasons set out in paragraph 540 of this report.

EXECUTIVE SUMMARY

5. A key redevelopment site and catalyst for change in the Old Kent Road Opportunity Area, the application site comprises a rectangular area land at the junction of Ilderton Road and Sharratt Street. The site is occupied by a vacant warehouse.
6. The potential of the site to make a contribution to the Council's homes and jobs targets is reflected in the adopted site allocation (NSP70) and the draft site allocation (OKR16), both of which identify the site as appropriate for delivering a significant quantum of new homes. Both of the allocations recognise that some tall buildings will be necessary to deliver these objectives. There is a housing phasing plan for the Old Kent Road to ensure public transport capacity matches development capacity, with the first 9,500 homes to be delivered in Phase 1 in advance of the signing of the construction contract for the Bakerloo Line Extension (BLE). The second phase of 10,500 homes would be delivered after the contract was signed. This site is identified as a phase 2 site so would be subject to a "Grampian" type obligation which would mean the housing element could not be implemented until the BLE contract is confirmed which is predicted to be in 2030.
7. This application proposes the construction of two buildings arranged to wrap around the site along the street frontages. The shoulder block height will be 10 storeys and the 30 storey tower will be set back from the streets. In brief, the development would deliver:
 - Purpose Built Student Accommodation (hereafter referred to as 'PBSA'), comprising 592 bedspaces;
 - a 1,030 square metre light Industrial workspace / incubator units in the form of Fab Labs (100% affordable workspace);
 - a 6,947 square metre self storage
 - a 109.6 square metre café; and
 - a 95.4 square metre cycle workshop



Image 1 (above): View of the proposal looking southwards from western side of Idderton Road

8. The proposed 592-bedspace PBSA, which would be entirely direct-let (i.e. not linked to any specific university or college) at market rate, would not include any affordable student rooms. Instead, the application proposes to prioritise the delivery of general needs affordable housing in the borough, which would be provided in the form of a payment-in-lieu of £20.7 million because it is not viable to include on-site conventional housing alongside a feasible amount of student housing on this brownfield site. This payment-in-lieu is equivalent to 35% affordable housing by habitable room which the Council's expert assessor has deemed to be reasonable. The payment-in-lieu could potentially be used to directly support the delivery of affordable housing

close to the application site, thereby bringing tangible benefits for the local community. This is considered to be a benefit of the application.

9. The PBSA would achieve high standards of residential design, providing a range of bedroom typologies supported by a suite of internal communal facilities. The application is supported by a strategy for integrating the student population with the future occupiers of the affordable workspace as well as the wider Old Kent Road community. A Student Management Plan, to be secured by planning obligation, would ensure the successful long-term management of the premises.
10. 7,977 square metres of commercial/business floorspace is proposed comprising light Industrial workspace / incubator units in the form of Fab Labs (100% affordable workspace) and self-storage. The affordable workspace provision substantially exceeds the minimum requirement and has been designed to accommodate flexible spaces with different sizes and types of units including three units which have individual entrances fronting Sharratt Street, providing an active frontage onto the street.
11. The application site is situated in a location where tall buildings are considered appropriate, subject to demonstration that they would achieve an exemplary standard of design and meet the requirements of the London Plan and Southwark Plan in all other regards. Forming an interesting composition and possessing a strong urban character, and with robust and high quality materials specified throughout, the proposed buildings would achieve an exemplary standard of architectural design. They would be set within high quality public realm, featuring numerous new trees and soft landscaping.



Image 2 (above): *Visualisation looking south from the junction of Ilderton Road and Sharratt Street*

12. With regard to amenity and environmental considerations, although the proposal would result in daylight and sunlight impacts at a small number of nearby existing properties that depart from the BRE guidelines, the retained levels are

still considered adequate for a dense urban area. The applicant's technical assessments, which quantifies and evaluates the scheme's expected impacts accounting for all proposed mitigation, has been assessed by officers in collaboration with specialists commissioned by the Council. The environmental effects can be acceptably managed through planning conditions and obligations.

13. As the report explains, the proposal would make efficient use of a prominently located and under-utilised site to deliver a high quality and sustainable development that on balance accords with the Council's aspirations for the area. In addition to the economic benefits brought by this proposal, such as the employment generating uses and the construction-related jobs and training, a range of financial contributions will be secured to offset the impacts of the development and assist with local and London-wide infrastructural investment.

PLANNING SUMMARY TABLES

14. **Conventional housing**

Homes	Private Homes	Private HR	Aff.SR Homes	Aff.SR HR	Aff.Int Homes	Aff.Int HR	Homes Total	HR Total
Studio	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
1 bed	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2 bed	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
3 bed	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
4 bed	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

15. **Commercial**

Use class and description	Existing GIA	Proposed GIA	Change +/-
E [a] to (f) (Retail/dining/services)	0	0	
E [g] i) (Office)	0	0	+1,030
E [g] ii) (Research and development)	0	0	
E [g] iii) (Light industrial)	0	1,030	
E [g] iii) (Affordable workspace)	0	1,030 (as a subset of the above)*	+1,030
B2 (Industrial)	0	0	N/A
B8 (Storage/Distribution)	1,115	6,947	+5,832
C1 (Hotel)	0	0	N/A
Sui Generis (PBSA)	0	20,643.6	+20,643.6

Sui Generis (cycle workshop)	0	95.4 (as a subset of the PBSA)	+95.4
Sui Generis (publicly-accessible café)	0	109.7 (as a subset of the PBSA)	+109.7

Employment	Existing no.	Proposed no.	Change +/-
Operational jobs (FTE)	0	25	+25

16. **Parks and child play space**

	Existing area	Proposed area	Change +/-
Public Open Space	0	0	N/A
Play Space	0	0	N/A

17. **Carbon Savings and Trees**

Criterion	Details		
CO2 Savings	39% improvement on Part L of Building Regs 2021		
Trees Lost	0 x Category A	0 x Category B	0 x Category C
Trees Gained	14		

18. **Greening, Drainage and Sustainable Transport Infrastructure**

Criterion	Existing	Proposed	Change +/-
Urban Greening Factor	0	0.4	+0.4
Greenfield Run Off Rate	N/A	2.1 l/s *	N/A
Green/Brown Roof Coverage	0	1646sq.m	+1646sq.m
Electric Vehicle Charging Points	0	2	+2
Blue Badge Parking Spaces	0	2	+2
Cycle Parking Spaces	0	687	+687

19. **CIL and Section 106 (or Unilateral Undertaking)**

Criterion	Total Contribution
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CIL (estimated)	£2,961,361
MCIL (estimated)	£1,988,33
Section 106 Contribution	As per the 'Planning obligations' section of this report

BACKGROUND INFORMATION

Site details

Location and description

20. The application site is located at the junction between Sharratt Street and Ilderton Road backing on the railway embankment on the edge of the administrative boundary of Southwark. It occupies a roughly rectangular parcel of land with Ilderton Road to the west, Sharratt Street to the north, Canterbury Industrial Estate to the south and Southern railway tracks to the east. The total area of the Site is approximately 0.34 hectares.
21. The Site is currently occupied by a rectangular shaped 2-storey warehouse and ancillary office space (Use Class B8). Hard standing yard space, historically used for open storage and vehicle parking, is situated to the north of the Site facing Sharratt Street. There are no existing trees located within the site.

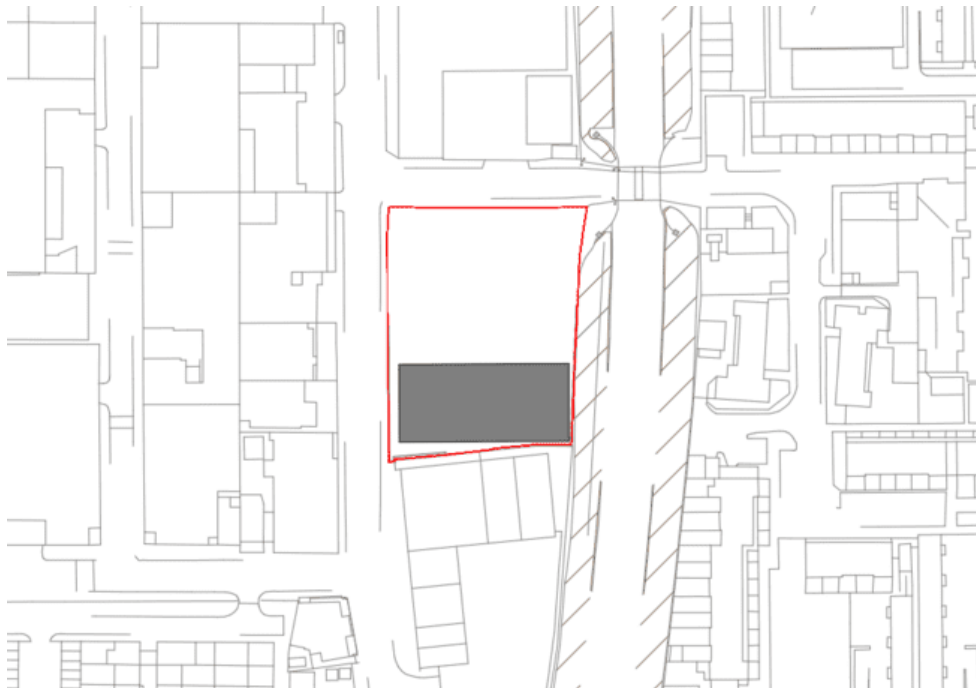


Image 3 (above): Location plan, showing the site edged in red.

22. Metal fencing currently runs around the periphery of the Site with existing access for both pedestrians and vehicles being from Sharratt Street. There is currently no access to the Site directly from Ilderton Road.



^ View key

Image 4 (above): Photographs of the existing site (numbered 1 to 4, clockwise from top left) with the viewpoints annotated on the map (bottom left).

Surroundings

23. The local area is characterised by a range of land uses, including residential, and commercial industrial, educational, cultural and leisure uses as well as some places of worship.
24. North of the site is the approved development proposals at 227-255 Ilderton Road (ref: 19/AP/1773) which is currently under construction. The Bermondsey Heights scheme comprises a part 2/3, 9 and 28 storey mixed-use development comprising of 2,538 sqm of industrial floorspace and 254 flats.
25. Immediately south of the site is the Canterbury Industrial estate consisting of mainly single storey building.

26. Immediately to the east is the railway embankment which marks the borough boundary of Southwark. Further beyond is three storey residential Oliver House and single storey Sankofa Nursery within Lewisham.
27. On the opposite side (western side) of the Ilderton Road, there are two storey industrial commercial buildings. Further to the north west is the approved development proposals at 180 Ilderton Road (ref: 22/AP/3339) which is led by Southern Housing currently under construction. This approved scheme comprises a part 5, 8 and 9 storey mixed-use development comprising of 2,361 sqm of flexible workspace and a part 5, 8 and 9 storey building to provide 84 residential units.
28. Both sides of Ilderton Road continues to be subject to substantial change. There are a series of planned tall building clusters coming forward within the Opportunity Area, particularly those on the eastern side of the Ilderton Road. These development clusters are aligned with the tall building strategy set out in the Old Kent Road Area Action Plan (hereafter referred to as the draft OKR AAP) which seeks to distribute taller buildings on the eastern side of Ilderton Road. These taller buildings should be spaced out along the length of Ilderton Road and should be set back from Ilderton Road adjacent to the viaduct. A 10 storey shoulder block should be provided fronting Ilderton road, to mediate the transition in scale; and the tallest buildings will be of a similar height to the existing towers on the Tustin estate.

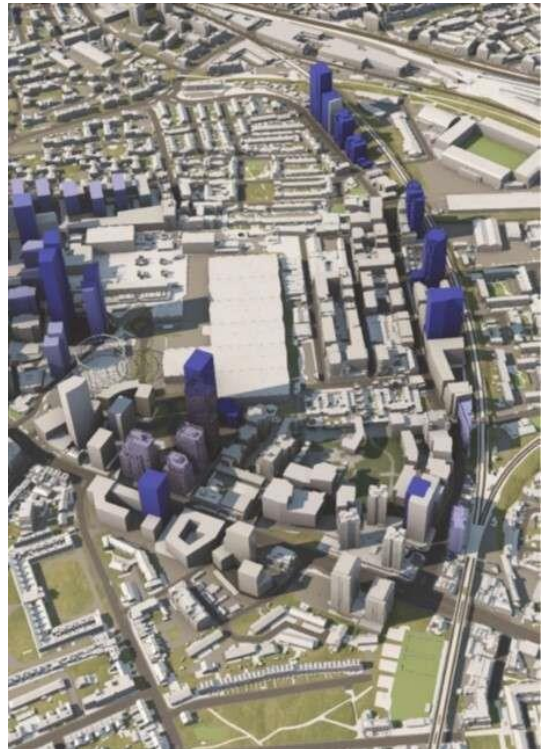


Image 5: Model of the Indicative building heights in subarea 4 in the Draft AAP

Designations

29. The following policy, socioeconomic and environmental designations apply to the application site:
- Site Allocation NSP70 (Hatcham Road, Penarth Street and Ilderton Road);
 - Old Kent Road Area Vision AV13;
 - Old Kent Road Opportunity Area;
 - Old Kent Road Strategic Cultural Area;
 - Old Kent Road Action Area;
 - Old Kent Road Action Area Core;
 - the Urban Zone;

- Hot Food Takeaway Primary School Exclusion Zone;
 - Flood Zone 3 (in an area benefitting from flood defences);
 - East Southwark Critical Drainage Area;
 - the Air Quality Management Area;
 - “East Central” Multi-Ward Forum Area; and
 - Community Infrastructure Levy Charging Zone 2.
30. The application site sits within the Core Area of the draft Old Kent Road AAP (hereafter referred to as the draft OKR APP). More specifically it sits within Sub-Area 4, ‘Hatcham, Ilderton and Old Kent Road (South)’. Within this Sub-Area, the application site forms part of the OKR 16 parcel, ‘Hatcham Road and Ilderton Road’, which covers 7.9 hectares of land and has an indicative capacity of 2,200 new homes and 2,698 additional jobs. The majority of the OKR 16 parcel is designated as a Locally Significant Industrial Sites within the draft OKR AAP and/or the Southwark Plan, and the application site falls part of the Locally Significant Industrial Sites.
31. With regard to heritage designations, the site does not include any listed structures and is not in a conservation area.
32. The site is within the 'North Southwark and Roman Roads' Tier 1 Archaeological Priority Area.
33. With respect to strategic and borough views, the site is not within any of the Borough or London View Management Framework (including the wider corridors settings and the background regions) views. The site does fall within the extended cone of the background wider setting consultation area of LVMF Townscape View 23A.1, from the bridge over the Serpentine to Westminster. The site sits approximately 1.6 kilometre beyond the 23A.1 Wider Setting Consultation Area of this view
34. There is no existing public space or trees within the application site. The nearest public green spaces are (in order of proximity):
- Pat Hickson Park located 200 metres (a 4 minute walk) to the north of the site, at the junction of Ilderton Road and Stockholm Road;
 - Bridgehouse Meadows located 280 metres (a 6 minute walk) to the east of the site;
 - Bramcote Park located 380 metres (a 8 minute walk) to the north-west of the site; and
 - The 63 acre Southwark Park located approximately 1 kilometre (a 19 minute walk) to the north of the site
35. Immediately to the east of the site is the South Bermondsey Railway Embankments Site of Importance for Nature Conservation (SINC) which is located in Lewisham.
36. With regard to transport connectivity, the current PTAL rating of the site is 2, which indicates an average accessibility to public transport. However, this rating

is predicted to rise to PTAL 4, indicating good public transport accessibility, once the planned transport network upgrades for the area have been completed.

37. South Bermondsey Overground is the nearest railway station, located approximately 680 metres to the north (a 13 min walk). It offers connections towards London Bridge, West Croydon and Beckenham Junction. The nearest underground station is Canada Water, approximately 1.2 kilometres to the northeast (a 19 min walk). As part of New Bermondsey masterplan, a station is proposed on the Overground (east London) line, in-between Surrey Quays and Queens Road Peckham stations; the entrance to the new station would be on Surrey Quays Road approximately 300 metres southeast of the application site in Lewisham.
38. A southbound bus stop is located in front of the application site, and a northbound bus stop is located further north of the application site on the opposite side of Ilderton Road. The P12 bus provides a regular service along Ilderton Road, connecting to Camberwell and Surrey Quays. There also four different bus routes available from nearby Rotherhithe New Road / Galleywall Road, which provide connections to central London and Peckham. The pedestrian routes around the application site provide easy access to the bus stops and train stations
39. With regard to local cycling infrastructure, National Cycle Route 425 runs east to west from Burgess Park to Rotherhithe. This route travels along a section of Ilderton Road and passes to the southwest of the site. Cycleway 4 connecting London Bridge with Greenwich is approximately 230 metres west of the application site. There will also be the Cycle Future Route 12 (CFR12) connecting Rotherhithe and Peckham including a stretch along western side of Ilderton Road which is located to south-west of the site and is expected to be completed in 2025. Once delivered, it will provide the site with enhanced cycle connectivity.
40. The nearest short-stay cycle storage facilities are at the Ilderton Road shopping parade approximately 100 metres to the north of the site. These facilities comprise a bank of twelve Sheffield stands (24 spaces).
41. With respect to parking and servicing infrastructure locally, there are:
 - four Blue Badge parking spaces nearby (on Verney Road and Varcoe Road within Bramcote Estate and at distances of no more than 500 metres from the application site);
 - opportunities for ad hoc on-street parking within Bramcote Estate;
 - four Car Clubs, as follows:
 - Zipcar on Verney Road, 500 metres away (a 10 minute walk);
 - Zipcar on Lynton Road, 500 metres away (a 10 minute walk);
 - Zipcar Club on Raymouth Road, 600 metres away (a 12 minute walk);
 - one loading bay (accommodating up to four small vehicles) on Penarth Street, approximately 400 metres northwest of the site.

42. Although the site is not within a Controlled Parking Zone (CPZ), there is a plan to extend the existing Old Kent Road CPZ into the area.
43. The highways of Ilderton Road and Sharratt Street (western section) are part of the borough network. All these highways are also subject to a Local Development Order (LDO), approved by Southwark Cabinet on 13 June 2023. The LDO permits the construction of an underground network of 7 kilometres of insulated pipes to carry heat from the South-East London Combined Heat and Power (SELCHP) facility in South Bermondsey to properties around Old Kent Road and Peckham for the purposes of supplying heating and hot water.

Details of proposal

44. This application seeks full planning permission for comprehensive mixed-use redevelopment of the site to provide Purpose-Built Student Housing including associated amenity and ancillary café and cycle workshop (Use Class Sui Generis), a new self-storage facility (Use Class B8), light Industrial workspace / incubator units (Use Class E(g)(iii)) and other associated infrastructure.



Image 6 (clockwise from left): Ground floor division of various uses; and typical floor plate division

PBSA Building

45. The PBSA building will front Ilderton Road comprising of two cores A and B. The building will have a shoulder block height of 10 storeys (32 metres AOD) with a 30 storey tower block setting back from the street (94.65 metres AOD).
46. The ground floor would accommodate a publicly accessible ancillary café (109.6 square metres), cycle workshop (95.4 square metres) and exhibition space (50 square metres). The lower floors would contain cycle storage space and various communal amenity spaces such as lounge areas, a gym, a quiet study zone, on-site laundry and a management office. These internal communal amenity spaces would amount to 765 square metres in total, equating to an average of 1.29 square metres per student. Outdoor amenity would also be provided in the form of a terrace amounting to 274.4 square metres. The upper floors would comprise a range of student cluster bedrooms served by shared living/kitchen/dining facilities, with a number of studios also provided. The

internal spaces would be given over to ancillary mechanical, electrical and other plant requirements to serve the proposed development.

47. The 592 PBSA units are all to be direct-let (i.e. A nominations agreement whereby all or some of the rooms would be operated directly by a higher education provider has not been agreed) Instead, it is expected that the scheme would be managed by the applicant or by an established PBSA accommodation manager. The units will be tied to occupation by Students and secured within the S106 Agreement.

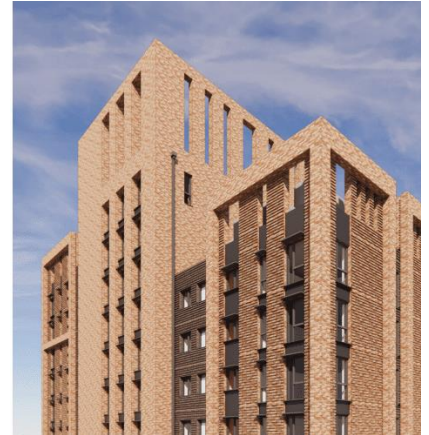


Image 7 (clockwise from top left): A visualisation of the two buildings as seen looking westward from Sharratt Street; Building A's crown treatment; Building B's base treatment; and

48. The proposed PBSA is car free with one disabled parking space to be provided within the southern service yard with a new vehicular access on Ilderton Road.

Commercial Building

49. The commercial building, to be attached the PBSA building with a small recess, would front Sharratt Street. Standing to a height of 10 storeys (32 metres AOD), the commercial building would comprise the light industrial / incubator units from the ground floor to fourth floor and the self-storage from the ground floor to ninth floor. The ground floor light industrial / incubator units will have their own individual entrances.

50. There will be a gated secured undercroft car park which will provide 9 parking spaces including 1 disabled parking and 2 vans spaces. Another disabled visitor parking space will be provided in front of the gate.

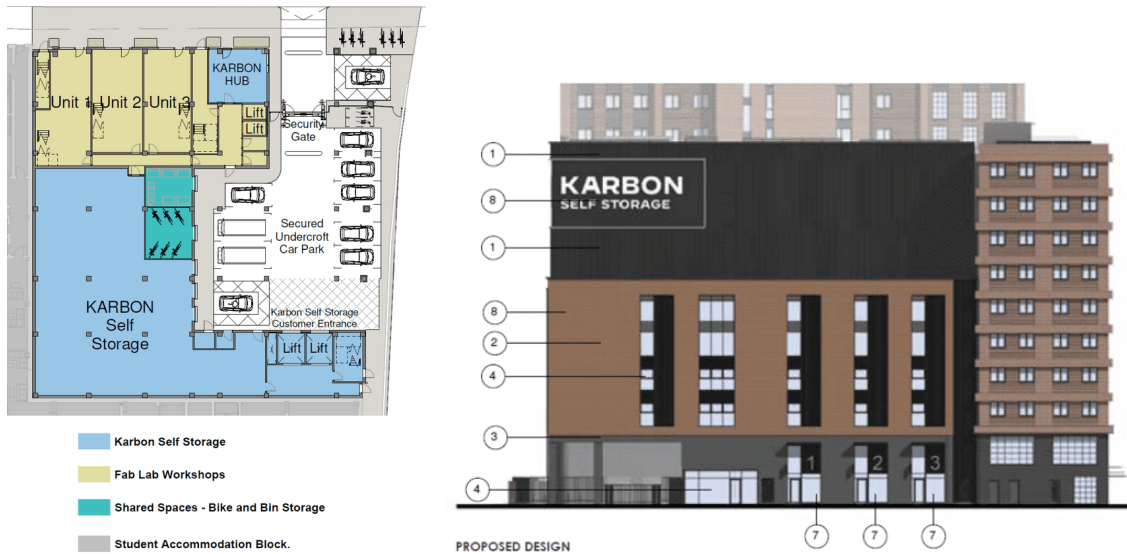


Image 8 (from left) Ground floor plan of the commercial building; northern elevation of the commercial building

Planning history of the application site and nearby sites

51. Appendix 3 sets out in detail the full planning history for the site as well as details of relevant applications on adjoining or nearby sites.

Pre-application engagement and mid-application amendments

Pre-application engagement

52. Planning application 23/AP/1317 was submitted following a detailed pre-application enquiry, the reference number for which is 22/EQ/0063. The pre-application process involved:
- six meetings with Council planning officers;
 - one workshop with Council transport officers;
 - one site meeting with network development officers
 - one meeting with GLA officers;
 - the applicant's attendance at the Council's Design Review Panel; and
 - the applicant's attendance on two separate occasions at the Old Kent Road Community Review Panel;
 - consultation meetings with ward councillors,
 - consultation meetings with community stakeholders including Vital OKR, Tustin Estate and Winslade Estate TRA, Ilderton Primary School and Christ Apostolic Church Surrey Docks;
 - consultation meetings with nearby developers including Renewal

(developer of New Bermondsey Quarter) and Barratt (developer of Bermondsey Heights);

- 2-days on-site public exhibition with 1,645 letters sent to local businesses and residents; and
- a website for the development

53. The Applicant initially proposed a scheme consisting of a self storage only at the pre-application stage in 2022. During the course of the pre-application, upon the request from officers, the applicant revised the scheme for 196 conventional homes, a self-storage unit and workspace in order to meet the aspirations of mix-used development in site allocation OKR16. However, the applicant later concluded the initial mixed-use scheme containing residential apartments is no longer viable due to the changes in the economic climate and changes to Building Regulations in relation to fire safety, and replaced the residential component with the currently proposed PBSA together with the self-storage unit and light industrial workspace.

54. During the course of the community engagement, the applicant engaged with the community to see how the PBSA could be integrated with the existing community optimally, and also made various amendments to the scheme design such as:

- incorporating cycle workshop within the PBSA building;
- refining the form and disposition of the buildings to achieve an appropriate relationship not only to each other but also in the context of the existing and emerging townscape;
- developing the architecture of the buildings to improve their legibility, materiality and distinctiveness;
- developing internal layouts of the light industrial / incubator units to be flexible to accommodate the needs of future occupiers and incorporating individual entrances to each ground floor unit and lifts for access to Level 2 & 3 workspace areas;
- developing the internal layouts of the PBSA units to achieve optimised configurations that perform well with respect to technical considerations such as dual aspect and daylight/sunlight receipt;
- fire safety provisions, in particular the need for the PBSA building to contain two escape stairs;
- increasing the amenity space provision;
- revising the delivery and servicing solution, including where and how provision would be made for student move in/out, on-site blue badge parking, and on-site loading and unloading for all the proposed uses;
- enhancing the public realm along Ilderton Road through a suite of highway upgrades, and financial contributions towards improving public transport including but not limited to increasing bus capacity.

55. The images below provide an overview of how the proposals evolved through the course of the pre-application process, comparing them with the final iteration as submitted for planning permission:



Accommodation Type

- AMENITY
- BINS
- CYCLES



Accommodation Type

- AMENITY
- CAFE
- BINS
- COMMERCIAL - FAB LABS
- COMMERCIAL - SELF STORAGE
- CYCLE WORKSHOP
- CYCLES
- PLANT

Image 9 (above): Ground floor layout and public realm proposals presented at pre-application meeting 3.

Image 10 (above): Revised ground floor layout and public realm proposals



Image 11 (above): Proposed View along Ilderton Road from the North looking South presented at pre-application meeting 3.



Image 12 (above): Revised Proposed View along Ilderton Road from the North looking South

56. At the end of this iterative process, the pre-application enquiry was closed and no formal response letter was issued by the Council. An overview of the pre-application consultation and engagement that has been undertaken, and the

responses to officer feedback, can be found in the applicant's Design and Access Statement as well as the Statement of Community Involvement

57. With regard to the Design Review Panel, the 'Design' section of this report sets out the Panel's comments and provides a summary of how the applicant responded to each of these. The copy of the Panel's full feedback can be found at Appendix 6.

Mid-application amendments

58. Over the course of the planning application process, the applicant has made further refinements to the proposal in response to concerns raised through the consultation process and/or issues highlighted by officers.
59. With respect to the uses of the building, the following changes are proposed:
- Incorporated café within the PBSA which would be publicly accessible;
 - Committed to provide 50 square metre exhibition spaces within the development for local schools, arts and community organisations for at least 25 occasions every year (at least 8 hours for each occasion);
 - Incorporated a cycle workshop unit
60. With respect to building and landscape design, changes and additional information included:
- reduction in number of student rooms from 615 to 592;
 - reduction in massing at the top of the building and the inclusion of a crown feature to modulate the upper floors of the building;
 - pulling back of the footprint of Block A to increase the width of the pavement on the corner of Sharratt Street and Ilderton Road;
 - moving some of the student internal amenity space from ground floor to first floor and the inclusion of a new community café that would be open to the general public;
 - removal of the raingarden features on the pavement to increase pedestrian width;
 - relocation of the security gate for the self-storage element
 - visitor cycle spaces within the self-storage element relocated to pavement
 - increase in size of the student external amenity space; and
 - more detail provided for the community bike workshop
61. With respect to energy and sustainability matters, changes to the energy strategy included:
- connection to District Heat Network to the PBSA;
 - use of air source heat pumps for active cooling and back up heating;
 - the expansion of the photovoltaics coverage (generating an additional 89.2kWp of renewable energy).
62. With respect to transport and highways, changes included:

- changes to the cycle storage proposals, including adjustments to the overall number and typological split of long-stay stands, as well as the layouts of the cycle store rooms;
 - changes to the bin store arrangements; and
 - revisions to the Blue Badge parking arrangement in the service yard of PBSA
63. The applicant also supplied a small number of supplementary and revised reports to provide clarifications and corrections with regard to various issues raised by consultees and officers. Other matters resolved during the course of the planning application process included commitments to certain planning obligations and other mitigation.
64. A second round of public consultation was undertaken in Feb 2024. The subsequent minor amendments did not necessitate any public consultation. This is because the changes did not:
- result in any enlargement to the buildings' scale; or
 - worsen any of the amenity or environmental impacts produced by the original scheme, or result in the creation of any new ones; or
 - remove, reduce or vary the mitigation originally proposed; or
 - engage any other issues potentially of wider public concern.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

65. The main issues to be considered in respect of this application are:
- Consultation responses from members of the public and local groups;
 - Environmental impact assessment;
 - Principle of the proposed development in terms of land use;
 - Impact of proposal on development potential of nearby land
 - Development viability;
 - Dwelling size mix;
 - Quality of residential accommodation – PBSA;
 - External amenity space;
 - Amenity impacts on nearby residential occupiers and surrounding area;
 - Design;
 - Public realm, landscaping and trees;
 - Green infrastructure, ecology and biodiversity;
 - Archaeology;
 - Transport and highways
 - Environmental matters;
 - Energy and sustainability;
 - Communications and aviation;
 - Socio-economic impacts
 - Planning obligations;

- Mayoral and Borough Community Infrastructure Levies;
- Community engagement;
- Consultation responses; and
- Community impacts, equalities and human rights.

66. These matters are discussed in detail in the ‘Assessment’ section of this report.

Legal Context

67. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. In this instance the development plan comprises the London Plan 2021, the Southwark Plan 2022 and the draft Old Kent Road Area Action Plan 2024. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires decision-makers determining planning applications 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.
68. 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.

Adopted planning policy

69. The statutory development plan for the borough comprises the London Plan 2021 and the Southwark Plan 2022. The National Planning Policy Framework 2023 is a material consideration but not part of the statutory development plan. A list of policies which are relevant to this application is provided at Appendix 2. Any policies which are particularly relevant to the consideration of this application are highlighted in the report.

ASSESSMENT

Consultation responses from members of the public and local groups

70. Consultation with members of the public was first conducted in September 2024 and then in February 2024. Letters were sent to local residents, the application was advertised in the local press and site notices were displayed. Comments were received from 1 local group and 1 developer of the adjoining site. The table below summarises the number of representations received during this period:

<u>Consultation: Summary table</u>	
Total number of respondents: 2	Total number of responses: 2

The split of views between the 2 respondents was:

In objection: **0**

Neutral: **0**

In support: **2**

Reasons in support

71. Listed below are the material planning considerations raised in support of the planning application by the consultation responses:
- provision of funding for affordable housing;
 - enhancements of public spaces with passive surveillance;
 - supporting local economy;
 - provision of new skills and employment opportunities;

Environmental impact assessment

72. Environmental Impact Assessment (EIA) 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.
73. 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.
74. The Council issued a screening opinion on the proposed development (ref: 23/AP/0737). While the development is considered an Urban Development Project, as defined in Schedule 2 of the Environmental Impact Assessment Regulations (2011) as amended, having considered the selection criteria referenced in Schedule 3 of the Regulations and the checklist set out in the National Planning Policy Guidance, it is considered that the development is not likely to have significant effects upon the environment. The matters to be considered can be adequately assessed through the submission of technical reports alongside the planning application, and therefore an EIA is not necessary. Those impacts which are identified through the various submitted reports and studies can be mitigated through appropriate conditions or obligations.

Principle of the proposed development in terms of land use

Relevant policy designations

Overarching strategic policy objectives

75. The National Planning Policy Framework (NPPF) was updated in 2023. 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 are considered in detail throughout this report. 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.
76. The Good Growth chapter of the London Plan includes objectives GG2 and GG5, which focus on making best use of land growing a good economy. To create sustainable mixed-use places that make the best use of land, objective GG2 states that those involved in planning and development must enable the development of brownfield land, particularly in opportunity areas and town centres, and prioritise sites that are well connected by public transport. It also encourages exploration of land use intensification to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. Objective GG5 states that to conserve and enhance London’s global economic competitiveness—and ensure that economic success is shared amongst all Londoners—those involved in planning and development must, among other things:
- promote the strength and potential of the wider city region;
 - ensure that London continues to provide leadership in innovation, research, policy and ideas, supporting its role as an international incubator and centre for learning;
 - provide sufficient high-quality and affordable housing, as well as physical and social infrastructure;
 - help London’s economy to diversify; and
 - plan for sufficient employment space in the right locations to support economic development and regeneration.

Old Kent Road Opportunity Area

77. The site is located within the Old Kent Road Opportunity Area where the London Plan recognises the potential for “significant residential and employment growth” to be realised through a suitable planning framework that optimises development in conjunction with improvements to public transport accessibility. The Old Kent Road Opportunity Area is identified within the London Plan as having an indicative employment capacity of 5,000 and an indicative residential capacity of 12,000 homes.
78. London Plan Policy SD1 encourages opportunity areas to:
- optimise residential and non-residential output;
 - optimise density; and

- contribute towards meeting (or where appropriate) exceeding the minimum guidelines for housing and/or indicative estimates for employment capacity.
79. The Old Kent Road Area Vision of the Southwark Plan 2022 sets out the overall vision for the Old Kent Road. The policy says development should:
- deliver direct benefits to the existing community including new and improved homes including new council homes, schools, parks, leisure and health centres, and the creation of jobs;
 - promote car free development and support the Bakerloo Line extension, electric buses, taxis, commercial vehicles and cycling which will help to tackle air and noise pollution;
 - help foster a community in which old and young can flourish;
 - build new homes that come in a range of types from terraced houses to apartments with a high design quality including generous room sizes, high ceilings and big windows to ensure people have space to think and to rest;
 - link existing open spaces like Burgess Park to each other and new park spaces; and
 - demonstrate excellent standards of environmental sustainability including pioneering new district heating networks to reduce carbon emissions, measures to tackle poor air quality and sustainable urban drainage systems to reduce flood risk.
80. The Old Kent Road Area Vision also states that the draft OKR AAP will set out the physical framework for enabling the community to realise its potential. The Council is in the process of preparing this AAP which proposes significant transformation of the Old Kent Road area over the next 20 years, including the extension of the Bakerloo Line with new stations along the Old Kent Road towards New Cross and Lewisham. A further preferred option of the OKR AAP (Regulation 18) was published in December 2020. On 20 November 2024, the Council Assembly endorsed the latest reiteration of the OKR AAP (Regulation 19) would be published for consultation before submitting for examination which is expected to be in spring/summer 2025. In accordance with paragraph 48 of the NPPF, the draft Regulation 19 OKR AAP has increased weight. This draft plan proposes the delivery of 20,000 new homes and 10,000 additional jobs within the Old Kent Road.
81. The London Plan specifically recognises the value of the proposed Bakerloo Line extension from Elephant and Castle to Lewisham and beyond, which would increase the connectivity and resilience of the Old Kent Road Opportunity Area while also reducing journey times to key destinations. The Southwark Plan Area Vision 13 and draft OKR AAP Policy AAP2 identify that housing development in the OKR will be phased (OKR Housing Phasing Plan) , with 9,500 homes being delivered in advance of the BLE and a further 10,500 homes being delivered once the contract for the construction of the BLE has been signed. This is in order to ensure that the public transport capacity in the Old Kent Road can support the quantum of development coming forward. The delivery and phasing plan in AAP2 identifies this site as a Phase 2 site. Should planning permission

be granted the scheme would be subject to a “Grampian” type obligation. This would prevent the planning permission from being implemented until the BLE contract is signed and would fall away once it is signed. It is anticipated that that would be likely to occur in 2030, so the consent would be granted for 5 years rather than the usual 3 years.

Southwark Plan Site Allocation

82. The Southwark Plan 2022 includes a site allocation, NSP70 ‘Hatcham Road and Penarth Street and Ilderton Road’ which the application occupies approximately 5.2% of NSP70 states that redevelopment of the site must:

- Provide new homes (C3); and
- Provide at least the amount of employment floorspace currently on the site (E(g), B class); and
- Provide industrial uses (E(g)(iii) or B8 use class); and
- Provide public open space - 1,990m²

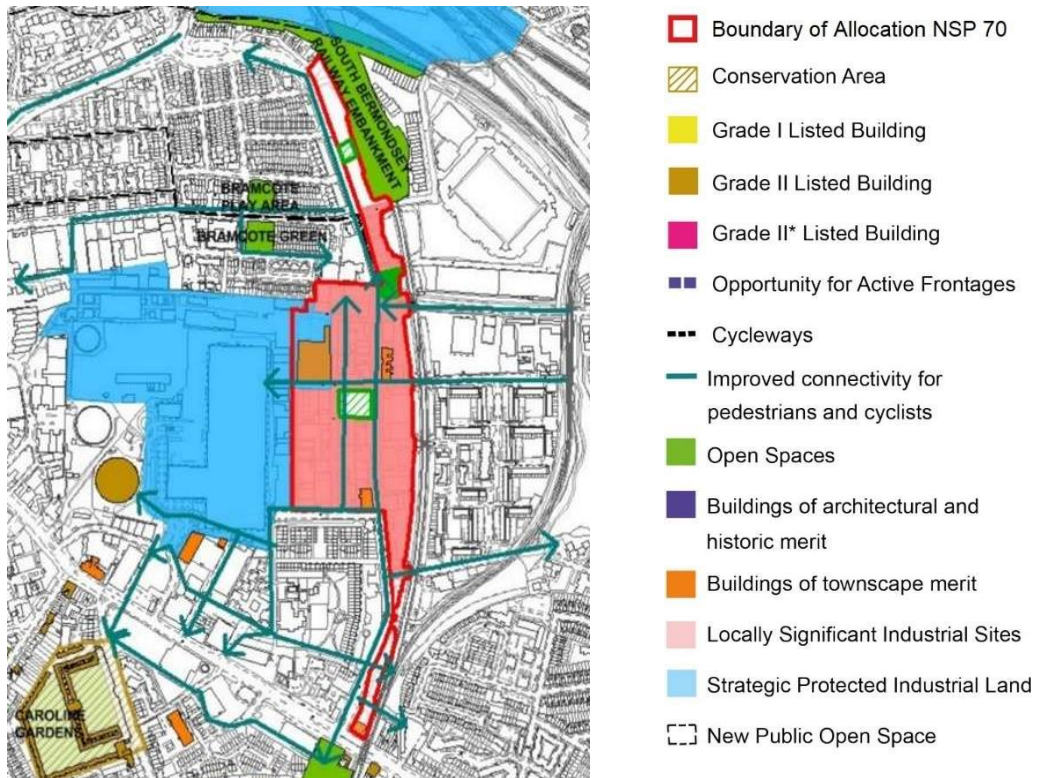


Image 13: Site allocation NSP70 ‘Hatcham Road and Penarth Street and Ilderton Road’ as depicted in the Southwark Plan 2022.

83. The design and accessibility guidance states that “development should reinforce the high street and provide a new part of the town centre.” The design guidance goes on to state that as the site falls within the Old Kent Road Opportunity Area, development will need to demonstrate that the site responds positively to the objectives of the draft OKR AAP.

84. NSP70 supports tall buildings and states that “comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape.”
85. The allocation also states that the site has the potential to connect to the District Heat Network (DHN) and South East Combined Heat and Power (SELCHP) network in the future.

Draft OKR AAP Site Allocation

86. The application site is located within the OKR 16 parcel of the draft AAP. This parcel, for which the draft AAP sets out a future growth vision, has a boundary very similar that of Southwark Plan Site Allocation NSP70.

87. The draft AAP sets out some ‘must’ deliverables of redevelopment within OKR 16. Those applicable to the application site are:

- deliver new homes; and
- replace existing on-site employment floorspace (to be consistent with the building and land use types shown in Figure SA4.3, see right); and
- Provide industrial uses; and
- Provide mixed use industrial and new homes typologies in the area designated as a Locally Significant Industrial Site



■ Horizontal Mix: Depots and medium-large storage and distribution units in mixed use developments
 ■ Horizontal / Vertical Mix: Small industrial units
 ■ Vertical Mix : Small office and studio
 ■ Publicly-accessible open space

Image 14: (right): Figure SA4.3 of the draft AAP, ‘Building Typologies and Land Uses’, cropped to the application site (edged in red).

88. There are seven schemes which were already been built within OKR16. The Bermondsey Height at 227 - 255 Ilderton Road is under construction which will provide a total of 254 homes and 2,538 square metres commercial floorspace. 62 Hatcham Road has been completed providing 86 homes. 180 Ilderton Road is about to complete with 84 homes. 313 Ilderton Road has completed with 58 homes and 250 student rooms. So in total there are 481 homes either built or under construction within this site allocation and 250 student rooms completed. Several planning schemes for OKR16 have been granted planning permission or are to be granted subject to S106 agreement, which will deliver a further 389 conventional family homes, 890 co-living units, and 7,717 square metres commercial floorspace. It is expected for these schemes to be delivered by 2030 (BLE Phase 1).

89. In total 870 conventional homes, 890 co-living units and 250 student rooms (in 313 Ilderton Road) are coming forward in this site allocation in phase 1 against a total site allocation of 2,200 homes. For the purposes of calculating a conventional residential equivalent in the Old Kent Road housing phasing plan 3 student rooms or 3 co living rooms are the same as single conventional home. So in total 1,250 homes are coming forward in phase 1. Which equates to about half the allocation. Of the 870 conventional homes coming forward about 50% would be affordable. A scheme for 49 conventional homes at 78-94 Ormside Street and the remainder of this allocated site (including this application site) is expected to come forward in the early 2030s (BLE Phase 2). This scheme is also a phase 2 scheme.
90. The OKR 16 vision also sets out the design of buildings in this site allocation should reflect its robust and functional industrious character.
91. The draft AAP also includes a strategy with regard to building heights in OKR16, the key elements of which are:
- Taller buildings will be located on the eastern side of Ilderton Road, particularly at the northern and southern ends which have better public transport accessibility, and around important junctions such as with Surrey Canal Road, which provides links to Lewisham and Bridgehouse Meadows. These taller buildings should be spaced out along the length of Ilderton Road and should be set back from Ilderton Road adjacent to the viaduct. A 10 storey shoulder block should be provided fronting Ilderton road, to mediate the transition in scale; and
 - The tallest buildings will be of a similar height to the existing towers on the Tustin estate

92. The servicing and road network strategy for OKR16 says Ilderton Road will be retained as two way working and Sharratt Street is a local residential street.

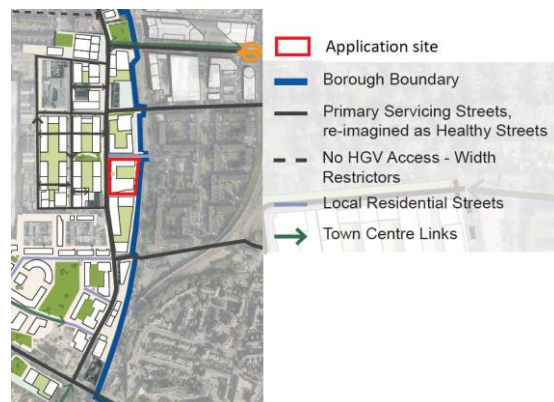


Image 15: (right): Figure SA4.4 of the draft AAP, 'Building Typologies and Land Uses', cropped to the application site (edged in red).

Hatcham and Ilderton Roads Design Code

93. The site is also subject to the Hatcham and Ilderton Roads Design Code, which sets targets and aspirations applicable to all new development within the area. The Code, which was prepared in accordance with the baseline standard of quality and practice set out in The National Model Design Code, is a continuation of the draft AAP, setting out in a greater level of detail the key design principles that developers will be expected to follow in order to gain

planning permission. Although it is not intended to be absolutely prescriptive, the Code defines the parameters within which developments will be expected to come forward more tightly than the draft AAP. The Design Code for OKR16 will be adopted as a Supplementary Planning Document (SPD) to the adopted AAP.

94. The Hatcham and Ilderton Roads Design Code includes Codes on sustainability, nature, movement, public open space, identity and character, land uses and homes

Conclusion on policy designations, including response to the site allocations

95. The overarching thrust of policies within the Development Plan is to optimise and make effective use of land. The site is a long-standing underutilised collection of land parcels and low-rise buildings, presenting a clear opportunity for optimisation.
96. In land use terms, the principle of redeveloping the application site for a mixed use development, including a mix of Purpose-Built Student Housing (Use Class Sui Generis), providing it meets the requirements of Policy P5 of the Southwark Plan and policy AAP 4 “Student Homes” of the draft OKR AAP (which is discussed in more detail below), a new self-storage facility (Use Class B8), light Industrial workspace / incubator units (Use Class E(g)(iii)) is on balance acceptable as it would bring into productive use this underutilised inner London site. The proposed mix and quantum of uses, subject to meeting the requirements of Southwark Plan Policy P5 and Policy AAP4 of the draft OKR AAP would on balance support the role, functions and ambitions of the Opportunity Area and meet the expectations of the two site allocations, NSP70 of the Southwark Plan 2022 and OKR 16 of the draft OKR AAP.
97. The acceptability of each of the individual uses is considered below.

Higher education and associated uses

Policy background

98. The London Plan sets out the strategic vision for the higher education sector. Policy S3, which is concerned with education facilities, acknowledges that universities play a vital part in ensuring Londoners have the higher order skills necessary to succeed in a changing economy, and for the capital to remain globally competitive. Under Part B of the policy is a set of criteria that development proposals for education facilities should meet, including:
- being located in areas of identified need;
 - being in locations with good public transport accessibility; and
 - fostering an inclusive design approach.
99. Paragraph 5.3.8 of the supporting text to Policy S3 states:

“Higher education in London provides an unparalleled choice of undergraduate and postgraduate degrees, continuing professional development, advanced

research, and infrastructure to support business growth, such as incubation space and business support services. It is also a significant employer and attracts major international companies able to benefit from universities' research reputations, such as in pharmaceuticals and life sciences. Universities also play a vital part in ensuring Londoners have the higher order skills necessary to succeed in a changing economy, and for the capital to remain globally competitive. The Mayor has established a forum for higher education institutions and further education establishments to work with boroughs and other stakeholders to plan future developments, including student accommodation, in locations which are well-connected to public transport"

100. London Plan Policy E8 states that London's higher and further education providers, and their development across all parts of the city, are to be promoted. Their integration into regeneration and development opportunities to support social mobility and the growth of emerging sectors should be encouraged. The supporting text endorses measures to secure and develop London's leading role as a centre of higher and further education of national and international importance.
101. Southwark Plan Policy P27 says that development for higher and further education facilities will be permitted where they meet identified needs.

Assessment

102. Southwark is home to Kings College London, the University of the Arts, and London South Bank University, representing some of the largest universities in London. There are also a number of noteworthy higher education providers in adjacent boroughs such as Lewisham, which is home to Goldsmiths, the latter being easily accessible via the Old Kent Road transport corridor. The draft OKR AAP seeks to bring a university and other higher and further education facilities to the area. Benefiting from future transport improvements which would result in high transport accessibility and good links to the aforementioned higher education institutions, the application site's proximity to the Old Kent Road South District Town Centre (400m) makes it appropriate for education-related uses.
103. The student housing proposed by this planning application would meet an identified need within Southwark for higher education related facilities, while also supporting the Opportunity Area to progress towards becoming a centre of excellence for education. It would also form an integrated part of a mixed-use redevelopment. Therefore, in principle the proposed student housing land use aligns with the requirements of London Plan Policies S3 and E8, as well as Southwark Plan Policy P27, providing that it contributes to the creation of a mixed and inclusive neighbourhood.
104. As student accommodation is a type of housing, the acceptability of the proposed PBSA as part of the planning application's overall residential offer is considered within the following 'Housing' assessment. Other related considerations, such as the quality and management of the accommodation,

and how transport impacts would be mitigated, are assessed in the relevant later parts of this report.

Housing

Policy background

105. The London Plan sets the borough a target of providing 23,550 net new home completions over the next ten years. The targets are to be achieved by: allocating a range of sites for housing; encouraging development on appropriate windfall sites; and optimising the potential for housing delivery on all suitable and available brownfield land. In order to help meet this target –while also ensuring social and other infrastructure is delivered to create mixed and inclusive communities as well as employment opportunities– London Plan Policy SD1 promotes mixed use development in opportunity areas, whereby functions such as retail and community are provided alongside housing.
106. Policy H1 of the London Plan seeks to optimise the potential for housing delivery on all suitable and available brownfield sites, especially on sites with existing or planned public transport access levels of 3-6 or which are located within 800 metres of a station or town centre boundary.
107. At the local level, the Southwark Plan and draft OKR AAP reiterate the targets established by the London Plan. Policy ST1 ‘Development targets’ of the Southwark Plan states that the Council “will work with our partners, local communities and developers to ensure that developments deliver the required growth and improvements to achieve our targets including 40,035 homes between 2019 and 2036 (2,355 new homes per annum)”. Of the 40,035 homes, the Plan aims for 11,000 to be new council homes. In seeking to play its role in the delivery of these borough targets, the draft OKR AAP sets out the phased delivery of 20,000 homes by the year 2042.
108. The regeneration of the application site for housing-led development is promoted by the site allocations in the Southwark Plan and the draft AAP. Both NSP70 and OKR 16 identify the allocation area’s capacity as being 2,200 homes.

Assessment

Principle of housing

109. By delivering 592 PBSA bedspaces, this planning application would contribute to realising the housing delivery targets for the Opportunity Area, in line with London Plan Policy SD1, while also increasing London’s housing supply, in accordance London Plan Policy H1.
110. The proposed housing units are lent further support by the Southwark Plan and the draft AAP, which promote residential uses on the application site in the quantum proposed, subject to the provision of affordable housing preferably on site or if not possible to provide onsite through the provision of a payment in lieu

(PIL). In this instance a PIL is proposed. The proposed housing would be entirely student homes, rather than a mix of conventional affordable housing and student homes and so would contribute to the creation of a less mixed and inclusive neighbourhood than would otherwise be the case. Nonetheless the scheme does include other non-residential uses including light industrial / incubator units (100% affordable workspace), community café and self storage in a well-connected inner London location, all of which contribute to the delivery of other plan aspirations, as would the payment of the PIL.

111. Appropriate design mitigation is provided in the residential element to ensure the industrial and related activities on-site and in surrounding parts of the Locally Significant Industrial Sites are not compromised in terms of their continued efficient function, access, service arrangements and days/hours of operation noting that many businesses have 7-day/24-hour access and operational requirements. The main design features include:
- separate entrances for the PBSA and the commercial units (See also 'Design' section);
 - adequate noise mitigation measures of the habitable spaces within PBSA including appropriate glazing and partition specification and use of Mechanical Ventilation with Heat Recovery (MVHR) (See also 'Quality of Residential Accommodation' section); and
 - off-street delivery and servicing arrangement (See also 'Delivery and Servicing' section)
112. A planning condition have also been imposed to ensure all the commercial units hereby permitted would be completed prior to the first occupation of the PBSA in order to the delivery of the industrial uses in accordance with Policy E7 (Industrial intensification, co-location and substitution) of the London Plan (2021).
113. Having regard to all of the above, and considering the conventional private and affordable housing which is being delivered within the wider site allocation all of which contributes to the creation of a mixed and inclusive neighbourhood the provision of residential floorspace, in form of PBSA with a PIL in respect of affordable housing , is on balance considered to be acceptable on this site.. This is subject to the PBSA meeting the relevant policies concerned with unit sizes, quality of accommodation, management arrangements and standards of amenity. These matters are discussed in later sections of this report.

Contribution towards borough housing targets

114. Through its assessment of the deliverable housing sites in the borough, the Council can demonstrate a five year supply of housing land, plus the necessary 20% buffer required by the housing delivery test. As the application site forms part of an identified 'allocation' in the Southwark Plan, its redevelopment for housing has been anticipated by the borough-wide assessment of deliverable housing sites. The borough-wide assessment attributed an indicative capacity of 2,200 new homes to the NSP70 allocation.

115. Although student housing is classified as non self-contained accommodation and a Sui Generis use in the Use Classes Order, it is considered as 'housing' for monitoring purposes through the Council's and GLA's monitoring reports. The London Plan advises that 2.5 student bedspaces should be treated as the equivalent of a single dwelling. With 592 student rooms proposed, the proposed development would contribute the equivalent of 237 (rounded) homes towards meeting the Council's housing targets. It would also reduce pressure on the local private rented market, in that it would release back to the private rented sector 237 single dwellings that would otherwise be in student occupation.
116. Aside from the contribution it would make towards the strategic housing targets set out in the Southwark and London Plans, the proposed PBSA would also assist in delivering off-site conventional (Class C3) housing, thus making a further contribution towards the targets. This is because the affordable housing payment in lieu is intrinsically linked to the delivery of the PBSA direct-let bedspaces.
117. The PBSA would deliver the equivalent of 237 homes. This directly equates to 10% of the borough's 2,355 home annual target and contributes indirectly towards the delivery of affordable homes elsewhere in the borough through the payment in lieu. Nonetheless as set out in the London Plan and draft OKR AAP, student housing should also contribute to a mixed and inclusive neighbourhoods as well as overall housing targets. As set out above, on balance this scheme is on balance considered to achieve that aim. In that context, the contribution the proposal would make to the Borough's housing delivery targets is acknowledged, albeit the lack of affordable housing on the site is disappointing given the great need for such provision.

Old Kent Road Housing Phasing Plan

118. The Greater London Authority (GLA) and Transport for London (TfL) officers have worked closely with Southwark Council officers to agree the broad geography and phasing of development across the area covered by the draft AAP, to help provide certainty to communities, local businesses and developers in advance of the Bakerloo Line Extension (BLE) and a clear timetable for its delivery.
119. As part of the collaborative process outlined above, and as per AV.13 'Old Kent Road Area Vision' of the draft AAP, a Housing Delivery Plan has been introduced. This comprises two consecutive phases, Phase 1 and Phase 2, each with their own housing number limit. For Phase 1, the cap is 9,500 net additional homes. Any scheme granted permission after the cap has been met would fall into Phase 2, and be subject to a Grampian agreement linked to BLE delivery. Phase 2 schemes will only be eligible for implementation once a BLE construction contract is in place. In respect of the OKR Housing Delivery Plan an agreed 3:1 conversion rate is applied in respect of PBSA schemes, where three PBSA units equate to one conventional (Class C3) dwelling.
120. In the wider context of extant planning permissions and live planning applications across the Old Kent Road Opportunity Area including those with

resolution to grant planning permission but are pending completion of a legal agreement bring the total number of homes within Phase 1 to 9,561 dwellings. This is summarised by the table below:

<u>Delivery of Old Kent Road Housing Phasing Plan: Summary table</u>	
Phase 1 schemes by status	No. of homes
Total of all Phase 1 schemes ^	9,561
Surplus/headroom relative to the 9,500-home cap	N/A
The 23/AP/1317 planning application	197

^ It includes 24/AP/0012 (Old Southern Railway Stables) proposing 32 units which the applicant has lodged an appeal against non-determination

121. Given that the proposal hereunder consideration would result in a breach of the 9,500 home cap, this development will be treated as a Phase 2 development. In order to avoid any undue infrastructural burden in the Opportunity Area, this proposed development be subject to the Grampian agreement to be secured in the Section 106 Agreement.

Conclusion on the provision of housing

122. Whilst residential uses are supported on this site at all policy levels, this is subject to both the provision of affordable housing where viable and also the contribution a scheme would make to a mixed and inclusive neighbourhood where student housing is proposed. The lack of onsite affordable housing means the development is inherently less likely to contribute to a mixed and inclusive neighbourhood than it might be, nonetheless it would make a contribution to meeting the Mayoral and local-level housing delivery targets. The PIL would contribute to affordable housing delivery and the site would play its part in delivering the capacity identified in Southwark Plan allocation NSP70 of 2,200 new homes. The provision of PBSA housing is on balance in this instance considered to be acceptable. In line with the Old Kent Road Housing Phasing Plan, the proposed development is within phase 2. The Applicant has agreed on a Grampian obligation in the S106 Agreement to avoid any undue infrastructural burden in advance of the Bakerloo Line Extension.

Student accommodation

Policy background

123. In order to help meet the London Plan target of 23,550 net new home completions over the next ten years, while also supporting the vibrancy and vitality of the town centres, Policy SD6 promotes mixed-use or housing-led intensification in these locations. The policy makes express reference to PBSA, saying the “particular suitability of town centres to accommodate a diverse range of housing should be considered and encouraged, including [...] student accommodation”.

124. Policy H15 of the London Plan sets an overall strategic requirement for purpose-built student accommodation (PBSA) of 3,500 bed spaces to be provided annually. The supporting text to Policy H15 is clear that PBSA contributes to meeting London's overall housing need and is not in addition to this need. Section 3.9 of the Mayor of London's Housing SPG states that specialist student accommodation makes an essential contribution to the attractiveness of London as an academic centre of excellence.
125. Part A of Policy H15 states that boroughs should seek to ensure the local and strategic need for PBSA is addressed, provided that:
1. the development contributes to a mixed and inclusive neighbourhood;
 2. it is secured for occupation by students;
 3. the majority of bedrooms and all affordable student accommodation is, through a nominations agreement, secured for occupation by students of one or more higher education providers;
 4. the maximum level of accommodation is secured as affordable student accommodation and;
 5. the accommodation provides adequate functional living space and layout.
126. Part B of Policy H15 encourages boroughs, student accommodation providers and higher education providers to deliver student accommodation in locations well-connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment schemes
127. Paragraph 4.15.3 of Policy H15 states that:
- “To demonstrate that there is a need for a new PBSA development and ensure the accommodation will be supporting London's higher education providers, the student accommodation must either be operated directly by a higher education provider or the development must have an agreement in place from initial occupation with one or more higher education providers, to provide housing for its students, and to commit to having such an agreement for as long as the development is used for student accommodation. This agreement is known as a nominations agreement. A majority of the bedrooms in the development must be covered by these agreements”.*
128. Where this is not achieved, paragraph 4.15.5 states that the accommodation will be treated neither as PBSA nor as meeting a need for PBSA. Instead, the development proposal will *“normally be considered large-scale purpose-built shared living and be assessed by the requirements of Policy H16 Large-scale purpose-built shared living”.*
129. At the local level, the Southwark Plan aims to deliver at least 40,035 homes between 2019 and 2036, equating to 2,355 new homes per annum. Policy ST2 of the Plan states that new development will be focussed in locations including Old Kent Road Opportunity Area, where the aim will be to balance the delivery of as many homes as possible against creating jobs, protecting industrial and

office locations, sustaining vibrant town centres, and protecting open space and heritage.

130. Policy P5 of the Southwark Plan requires PBSA proposals where all the bedspaces would be 'direct-lets', as is the case with the scheme proposed at Devonshire Place as set out below:
- as a first priority deliver the maximum amount of PBSA alongside a minimum of 35% of the habitable rooms as conventional affordable housing (subject to viability);
 - in addition to this provide 27% of student rooms let at a rent that is affordable to students as defined by the Mayor of London.
131. Policy P5 is structured in recognition of the acute need for more family and affordable housing within the borough. One of the footnotes to the policy explains that *"allowing too much student accommodation will restrict our ability to deliver more family and affordable housing. By requiring an element of affordable housing, or a contribution towards affordable housing from student housing development providing direct-lets, we can make sure we work towards meeting the strategic need for student accommodation and our local need for affordable homes including affordable family homes"*.
132. As such, the student housing policies of the Southwark Plan and London Plan, Policy P5 and Policy H15 respectively, differ in two key ways:
- Policy H15 prioritises the delivery of the maximum viable number of affordable student rooms (and does not expressly require student housing proposals to deliver conventional affordable housing either on- or off-site), whereas Policy P5 prioritises the delivery of conventional affordable housing; and
 - Policy H15 expects at least 51% of the bedspaces (the majority) to be subject to a nominations agreement, whereas Policy P5 requires all the bedspaces to be subject to a nominations agreement subject to viability.
133. Section 38(5) of the Planning and Compulsory Purchase Act 2004 (as amended) confirms that if to any extent a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy contained in whichever of those documents became part of the development plan most recently. As the Southwark Plan underwent examination and was adopted more recently than the London Plan, the policies within the Southwark Plan take precedence in this instance. The Council faces a complex situation locally with regard to the provision of affordable housing; at the Southwark Plan Examination in Public, the examining Inspectors recognised this challenge as presenting specific local circumstances in Southwark with regard to PBSA, and endorsed Policy P5 cognisant that the policy requirements do not fully align with those of the London Plan PBSA policies. Essentially, this means a student housing planning application within Southwark prioritising the conventional affordable housing contribution may be acceptable in principle in policy terms, despite not fully aligning with the expectations of London Plan Policy P15.

134. When assessing the principle of a student housing scheme, the policies outlined above require consideration of:
- the principle of introducing a housing use to this site;
 - the local and strategic need for student housing;
 - whether the student housing would contribute to a mixed and inclusive neighbourhood;
 - securing the accommodation for student occupation;
 - whether a nominations agreement has been secured;
 - securing the maximum level of affordable housing subject to viability; and
 - whether adequate and functional accommodation and layouts would be provided.
135. The following paragraphs of this report assesses the proposed development against these considerations. Later parts of this report deal with the other matters that these policies refer to, such as the affordable housing offer, quality of accommodation and transport aspects.

Assessment

Is there a local and strategic need for student housing?

136. There is a demand for more student accommodation across London, which needs to be balanced with making sure Southwark has enough sites for other types of homes, including affordable and family housing. The affordable housing element of the current application is considered further in a separate section of this report.
137. There are several higher education institutions (HEIs) in the borough with teaching facilities and student accommodation. These include London South Bank University (LSBU), Kings College London (KCL), University of the Arts (UAL) and London School of Economics (LSE). Mountview Academy, based in Peckham Rye, also provides a range of undergraduate and postgraduate degrees validated by the University of East Anglia (UEA). The borough is also home to some other smaller satellite campuses.
138. The strategic need for student accommodation is evidenced through the GLA paper 'Student Population Projections and Accommodation Need for new London Plan 2017' (amended October 2018). Drawing on Higher Education Statistics Agency (HESA) data, this document sets out the annual student housing need for 3,500 bed spaces within London over the plan period. The study projects the total student accommodation need in London to increase from 104,835 bed spaces to 171,063 bed spaces by the end of the plan period (2041/42).
139. The evidence base underpinning the Southwark Plan included a background paper on student housing, dated December 2019. It refers to the Council's Strategic Housing Market Assessment (SHMA) Update 2019, which found that:

- major HEIs within Southwark provide a total of 23,500 course places;
- over 21,000 students aged 20 or above live in the borough during term time;
- at least 50% of these students live in private rented accommodation, while 15% live with their parents; and
- there are some 7,800 bed spaces in PBSA in the borough.

140. In summary, since the proposed accommodation would add to a number of pre-existing direct-let student housing developments in the borough, it would nevertheless contribute towards the Borough's and London's stock of PBSA, for which there is an identified need. In this respect, the application addresses the overarching aim of Part A of London Plan Policy H15.

Would the student housing contribute to a mixed and inclusive neighbourhood?

141. Criterion 1 of London Plan Policy H15(A) requires student housing proposals to contribute to a mixed and inclusive neighbourhood.
142. AAP Policy 4 (Student Homes) of the draft AAP (2024) states that developments with student homes should demonstrate that they would integrate with the existing and future residential and business communities creating successful mixed and inclusive neighbourhoods, taking account of:

- 2.1. The proposal's delivery of the co-location of new residential accommodation with business and commercial space as set out in the sub area sections of the AAP; and*
- 2.2. The proposal's proximity to other student housing developments, higher education institutions and local services / infrastructure; and*
- 2.3. The availability of other sites for other types of homes, including affordable and family homes; and*
- 2.4. The proposal's delivery of other plan priorities, including affordable housing, affordable workspace and public open space that contributes to the delivery of the greener belt and movement strategies;*

143. Alongside the PBSA, the proposed development would include business and commercial space in the form of light industrial units (100% affordable workspace) and self storage, which would comply with criteria 2.1 of the draft AAP Policy 4

144. The immediate existing area surrounding the application site is characterised by a mix of uses, including residential, commercial industrial, educational, cultural and leisure uses. There are a number of large residential estates containing terraced houses and flatted residences within a range of point-blocks and deck-access buildings including:

- Tustin Estate (approximately 120m metres south-west of the application site);
- Bonamy and Bramcote Estate (approximately 300m metres north-west of the application site); and

- Winslade Estate in Lewisham (approximately 90m metres west of the application site)

145. There is one completed student scheme within 500m of the site at 313 Ilderton Road that contains a total of 250 student rooms. That scheme also comprises 35% on site affordable housing and light industrial use at ground and first floor levels. Within the Old Kent Road, two further entirely PBSA schemes have been completed at 671-679 Old Kent Road (known as the former KFC site, ref: 20/AP/2701) and at 272 St James Road (ref: 18/AP/0156, allowed by appeal) which are circa 590m and 930m away. There is a further entirely PBSA scheme at 43-47 Glengall Road (ref: 20/AP/0039) that is circa 1.3km away and will complete in early 2025. In total, these schemes provide 1,193 PBSA rooms in the OKR AAP area. There are no other planning consents at present for student schemes in the OKR16 site allocation, although there is a scheme in at pre application stage.

146. In terms of the emerging context within the site allocation OKR16 within sub area 4 of the draft OKA AAP, the table below shows there have been 245 conventional homes, 250 PBSA beds and 5,556sqm of commercial space completed and there is currently one scheme under construction which will provide a total of 254 conventional homes and 2,538sqm commercial floorspace. Several planning applications have been approved or received resolution to grant by the planning committee for the sites which will deliver a further 438 conventional homes and 886 Purpose Built Co-Living (PBCL) units and 8,406 sqm commercial floorspace under phase 1. Of the total conventional homes, approximately 37.8% will be affordable housing. Furthermore, 49 conventional homes together with 1,242 sqm commercial floorspace are also approved for phase 2.

Development within site allocation OKR16					
Ref	Address	Conventional homes	Student beds	Co-living units	Non-residential
Phase 1					
Built					
16/AP/1092	171-177 Ilderton Road	8	N/A	N/A	338
16/AP/2436	Atar House, 179 Ilderton Road	9	N/A	N/A	166
17/AP/3757	62 Hatcham Road	86	N/A	N/A	1,185
17/AP/4546	180 Ilderton Road	84	N/A	N/A	2,351
20/AP/1329	313-349 Ilderton Road	58	250	N/A	1,526
Subtotal		245	250	N/A	5,566
Under Construction					
19/AP/1773	227-255 Ilderton Road	254	N/A	N/A	2,538

Subtotal		254	N/A	N/A	2,538
Approved					
20/AP/3560	301-303 Ilderton Road	59	N/A	N/A	449
21/AP/1121	12-38 Hatcham Road	49	N/A	N/A	1,500
21/AP/1619	132-136 Ormside Street	0	N/A	N/A	270
21/AP/4757	Ilderton Wharf, 1-7 Rollins Street	163	N/A	N/A	988
23/AP/0387	79-161 Ilderton Road	120	N/A	605	1,023
Resolution to grant subject to s106 and GLA Stage II referral					
22/AP/1603	18 - 22 Penarth Street	47	N/A	281	4,176
Subtotal		438	0	886	8,406
Phase 2					
Approved					
23/AP/2226	78-94 Ormside Street	49	N/A	N/A	1,242
Overall total		986	250	886	16,510

147. Furthermore, a hybrid planning permission for a total 690 homes and 5,666 (GEA) non-residential floorspace has also been granted for the Tustin Estate redevelopment (ref: 22/AP/1221). Phase 1 of the Tustin development is currently undergoing construction which will deliver 167 conventional homes.
148. It is also noted that new development involving PBSA within nearby site allocation OKR18 within subarea 4 has been given planning consent or resolution to grant. These sites are located approximately 300 metres south-west of this application site:

New development involving PBSA within nearby site allocation OKR18					
Ref	Address	Conventional homes	Student beds	Co-living units	Non-residential
Approved					
23/AP/1862	747-759 & 765-775 Old Kent Road and Land at Devonshire Grove	200	941	N/A	908
Resolution to grant subject to s106 and GLA Stage II referral					
23/AP/0582	Daisy Business Park	23	688	N/A	2,000

149. When considering the cumulative impacts of the emerging PBSA developments nearby within the site allocation OKR16 and OKR18 and the Tustin Estate redevelopment, it should be noted that some of these schemes may or may not be implemented despite the grant of planning permission. Also, these schemes if implemented will also deliver a substantial number of new homes with different bedroom and tenure mix (1,747 homes) together with non-residential uses in the area. Furthermore, there also other sites available within OKR 16 and OKR 18 that could potentially come forward for conventional housing development.
150. Considering the above, the overall proportion of the conventional homes in subarea 4 would still be broadly maintained. The development therefore would meet criteria 2.2 and 2.3 of the draft AAP Policy 4.
151. The proposal would also contribute to other plan priorities through Affordable Housing Payment in Lieu (PIL) (See also the Affordable housing and development viability section below) and affordable workspace (see also the Principle of Development – non-residential development section below). Hence, it would comply with criterion 2.4 of the draft AAP Policy 4.
152. Introducing the amount of student housing proposed alongside other commercial uses in an area where conventional residential uses are well represented, is on balance in this instance considered to contribute to a mixed and inclusive community.

Would the accommodation be secured for student occupation?

153. Criterion 2 of London Plan Policy H15(A) requires the use of the accommodation to be secured for students.
154. The proposed development will be managed by an independent provider, most probably Homes for Students, an Accreditation Network UK certified operator. As such, responsibility will rest with Homes for Students to ensure the units are let to students on courses with HEIs. Student-exclusive use will be secured by way of an obligation in the Section 106 Agreement.
155. A supporting paragraph to Policy H15 notes that boroughs should consider allowing the temporary use of accommodation during vacation periods for ancillary uses. The viability evidence base for the Southwark Plan tested direct-let student housing schemes assuming a 40 week term time tenancy with 11 week non term-time let allowance. In light of this, it is considered reasonable to allow the operator of the proposed student housing scheme to let the rooms during the vacation period when not in use by the principal student occupiers. This will be secured through the Section 106 Agreement.

Is a nominations agreement in place?

156. Criterion 3 of London Plan Policy H15(A) requires the majority of the accommodation within a PBSA proposal to be secured for students, and for this to be achieved through a nominations agreement with one or more HEIs.

157. The applicant does not intend to enter into a nominations agreement with a HEI for any of the proposed accommodation; instead, the accommodation will be directly managed by an independent provider. While the proposed development would not comply with Criterion 3 of Policy H15(A) due to being 100% 'direct-let', the locally-specific and more up-to-date student housing policy (Southwark Plan Policy P5) supports direct-let student housing subject to the provision of affordable housing (which is in turn subject to viability) and additionally a proportion of the affordable student accommodation, and recognises it as PBSA. Accordingly, it is considered that if a development proposal complies with the affordable requirements that Policy P5 sets out for direct-let schemes, there is a policy compliant basis in this location for student accommodation schemes to not require the securing of a nominations agreement.

Has the maximum level of affordable housing been secured?

158. Criterion 4 of London Plan Policy H15(A) requires the maximum level of accommodation to be secured as affordable student accommodation.
159. However, and as mentioned in earlier parts of this report, it is considered that Southwark Plan Policy P5, in its prioritisation of conventional affordable housing delivery (subject to viability), provides a legitimate alternative pathway for student accommodation proposals to provide maximised affordable housing. While such general needs affordable housing would preferably be delivered on-site, a payment-in-lieu may be appropriate in exceptional circumstances and subject to robust justification, as per the Council's Section 106 Planning Obligations and Community Infrastructure Levy (CIL) SPD.
160. While the London Plan's specific requirement for student housing proposals to deliver affordable rooms is noted, the Council's priority is for conventional affordable housing due to the pressing need in the borough. Officers consider that although there would be some benefit to providing affordable student housing, this would be significantly outweighed by the benefits arising from general needs affordable housing delivery. Therefore, the latter should be prioritised. Southwark is one of the top four London Boroughs in terms of the provision of student housing, and already contributes significantly to London's student housing needs (notwithstanding the fact that there remains an unmet demand for student housing in the borough as set out earlier in the report). In reviewing the viability of the scheme, therefore, the surplus has been considered in terms of a contribution towards general needs affordable housing, rather than for use in reducing the rent levels of students occupying the site. Including affordable student housing within the development would adversely affect the overall viability, and therefore the level of contribution the development could make to general needs affordable housing.
161. The proposed development has been viability reviewed to determine the maximum viable contribution towards conventional affordable housing. The current offer of 35% Affordable Housing Payment in Lieu (PIL) offer represents the maximum viable contribution.

162. Since the affordable housing PIL offer does not meet the Southwark Plan 40% Fast Track requirement, an implementation-dependent Early Stage Review and post first occupation Late Stage Review will be imposed through the Section 106 Agreement. The matter of viability is dealt with in detail in a subsequent part of this report.

Does the accommodation provide adequate functional living space and layout?

163. A supporting paragraph to London Plan Policy H15 states that schemes not securing a nominations agreement for the majority of the accommodation will normally be considered as large-scale purpose-built co-living (PBCL). The London Plan expects the quality of accommodation PBCL schemes to be assessed against the requirements of Policy H16 and Purpose-built Student Accommodation London Plan Guidance (2024); these are more onerous than the counterpart standards for PBSA, which are set out in Criterion 5 of Policy H15(A). However, owing to the supportive position of the Southwark Plan regarding the principle of 100% direct-let PBSA, when assessing whether the accommodation proposed by this planning application would provide adequate functional living space and layout, it is considered appropriate to do so against the standards set by Criterion 5 of Policy H15(A) rather than Policy H16.
164. Criterion 5 of Policy H15(A) requires the accommodation to be adequate and functional in terms of its living space and layout. Southwark Plan Policy P5 which requires 5% of student rooms as “easily adaptable for occupation by wheelchair users”.
165. It is considered that the proposed development would provide good quality accommodation for students, meeting the expectations of the London Plan Policy H15 Part A (5) and Southwark Plan Policy P5. The spatial arrangement, environmental internal conditions, level of amenity (within the individual units and the communal spaces), and the provision of wheelchair housing would all be adequate, as explained in detail in a subsequent part of this report entitled ‘Quality of Accommodation’.

Is the location suitable for student accommodation?

166. Part B of London Plan Policy H15 requires student housing scheme sites to be well connected by transport to local services. Situated within the Opportunity Area and proximity to the Old Kent Road South District Town Centre (within 7 minutes’ walk), the site benefits from future transport improvement which would result in high accessibility to public transport, conveniences and services. There are also numerous leisure and recreation spaces available for students nearby, including Brimington Park and Bridgehouse Meadows. Goldsmiths approximately 20 minutes away by bus. For all of these reasons, the application site is considered to a suitable location for PBSA.

Summary on the principle of student housing

167. In conclusion, the site is considered to be appropriate in principle for student accommodation, meeting a demonstrable need and achieving compliance with

the requirements of London Plan Policy H15, Southwark Plan Policy P5 and draft AAP Policy 4. The proposal would provide high quality accommodation for students in an accessible and sustainable location and are considered on balance to contribute to the creation of a mixed and inclusive community in the area considering the existing large residential estates nearby and the emerging context with other mixed use development nearby within site allocation OKA16 and OKA18 and the Tustin Estate renewal.

168. Through its assessment of the deliverable housing sites in the borough, the Council can demonstrate a five year supply of housing land, plus the necessary 20% buffer required by the housing delivery test. The Southwark Plan anticipates will come forward at an average of approximately 601 homes per year over the period to 2036. The London Plan advises that 2.5 student bedspaces should be treated as the equivalent of a single dwelling; with 592 student rooms proposed, the development would contribute the equivalent of 237 (rounded) homes towards meeting the Council's housing targets. This would make a substantial contribution towards the annual target of 601 homes, and as such is welcomed. It would also reduce pressure on the local private rented market, in that it would release back to the private rented sector 237 single dwellings that would otherwise be in student occupation. In addition, affordable housing payment in lieu is also secured to deliver conventional homes elsewhere in the borough.
169. The proposed student housing scheme therefore would not compromise the Council's ability to meet its strategic housing targets set out in the Southwark Plan and London Plan, because student housing contributes towards the borough's housing delivery targets. However as noted in the Southwark Plan the provision of student housing needs to be balanced with making sure there are enough sites for other types of homes including affordable and family homes.
170. For the reasons given above, the proposed student accommodation use would help contribute to the strategic housing delivery targets of the development plan, but in order to ensure the Council's vision to "build more homes of every kind in Southwark and to use every tool at our disposal to increase the supply of all different kinds of homes", as set out in Southwark Plan Policy ST2 is met the balance with conventional housing needs to be considered as well. As set out above in paras 141 to 152 when considering the development coming forward in the site allocation area on balance there is still considered to be an acceptable mix of homes in this neighbourhood.

Non-residential (commercial/employment/business) uses

Policy background to employment/business uses

171. At the borough level, a strategic target of the Southwark Plan is to build a strong, green and inclusive economy. To achieve this, Policy SP4 aims to bring forward at least 460,000 square metres of new office space between 2019 and 2036 (equating to around 35,500 jobs), of which 90,000 square metres should be located outside the CAZ. The policy goes on to say this 90,000 square metres of employment use should include industrial, distribution, hybrid and studio

workspace. It also sets a strategic target of 10,000 new jobs for the Old Kent Road Opportunity Area and expects 10% all new employment floorspace to be affordable workspace for start-ups and small and independent businesses.

172. Policy P30 of the Southwark Plan identifies sites within the CAZ, opportunity areas and town centres as appropriate for accommodating the significant growth needed to meet business demand. This policy requires development proposals at the very least to maintain, but where possible increase, existing levels of business floor space. Applications proposing employment floorspace should be supported by a marketing strategy to demonstrate how the facilities would meet current market demand. In opportunity areas, Policy P30 states that proposals should help contribute to mixed use neighbourhoods by incorporating new types of flexible business workspace accommodating manufacturing, technology, science, creative and cultural industries and the digital economy.
173. The Southwark Plan and OKR AAP site allocations expect at least the amount of employment/business floorspace currently on the site (Class E(g) / B Class uses) to be reprovided.

Policy background to affordable workspace

174. Policy P31 of the Southwark Plan deals with affordable workspace. Although affordable workspace technically applies to employment/business uses, Criterion 2 of the policy requires major development proposals to deliver affordable workspace amounting to at least 10% of the gross new employment floorspace (i.e. not just employment/business space, but commercial space too). The workspace should be secured on site at a discounted market rent for a period of at least 30 years. The policy recognises that there are many different forms that such space could take depending on the site location, characteristics, the nature of local demand and existing/proposed uses.

Assessment

Quantum of proposed non-residential use compared to existing land use

175. The site contains a 2-storey warehouse with approximately 1,115 sqm of industrial floorspace (Class B8).
176. The proposed commercial building will accommodate 1,030 sqm GIA of light industrial units in the form of 'Fab Lab' (Class E(g)iii) and 6,947 sqm GIA of self-storage. The ground floor light industrial units have been designed to allow business to grow with demountable mezzanine floors without requiring planning permission in the future as, and when required which means a maximum of 10,298 sqm GIA could be accommodated within the proposed commercial building.

177. The comparison of existing and proposed employment floorspaces are provided below:

Proposed Commercial Uses and quanta: Summary table			
	Class E(g)(iii)	Class B8	Total
Existing	0	1,115	1,115
Proposed	1,030	6,947	7,977
Net increase			6,862

178. Overall, the proposals would result in an uplift of a minimum of 6,862 sqm (GIA) of industrial / storage and distribution floorspace, which would exceed the re-provision of existing quantum of non-residential floorspace requirement stated in the site allocations NSP70 in the Southwark Plan and OKR16 allocation in the draft OKR AAP. The smaller nature of the light industrial units would also meet the needs of the creative industries.
179. Furthermore, a planning condition have been imposed to restrict the Fab Labs to light industrial uses (Class E(g)(iii)) only. This would preclude any potential future changes of use to other sub-categories within Class E that would otherwise be permitted under the GPDO. Currently, there are not any permitted development rights to go from B8 to any other use class. A planning obligation has been attached to ensure 7,977 square metres GIA of industrial or storage and distribution uses (Class E(g)(iii), B(8) and B(2)) will be retained throughout the lifetime of the development. This is to ensure the long-term land use vision for this part of the OKROA is realised. This represents an improvement on the existing as the current building benefits from flexible Class E use including non-industrial and logistics uses.

Affordable workspace

180. The total quantum of proposed employment-generating floorspace within the development is 7,977 square metres GIA. Under the terms of Policy P30, at least 10% of this (i.e. at least 798 square metres) should be dedicated as 'affordable workspace'.
181. The proposed development will deliver 1,030 sqm GIA which substantially exceed the 10% of the minimum affordable workspace required (i.e. 798 sqm GIA). The affordable floorspace will be provided in the form of 'fab labs' which are light industrial workspace/ incubator units (Class E(g)(iii)) primarily targeted at individuals seeking small, affordable, flexible industrial style space such as artists, painters and potters, community groups, carpenters, framers, and other light industrial businesses, and start-up businesses.
182. The ground floor Fab Labs Units will have an element of double height space with floor to ceiling heights of approx. 5.7m. Proposed partial mezzanines are illustrative (as desired). The applicant has engaged three perspective charities to understand their desired type of space and the Fab Labs have been designed to accommodate

variety of different flexible space which would allow the future charity operator to let the space to a mixture of Class E(g)(iii) tenants across the 3 floor levels to create diversity within the facility. The applicant has been discussing the potential lease terms of the affordable workspace with Southwark Studio.

183. The Section 106 Agreement will include a dedicated affordable workspace schedule. This will ensure, among other things, that:
- the workspace is provided for a 30-year period at a peppercorn rent for months 0-11, and then from 12 months until the end of the affordable workspace lifetime at no more than £15/sq.ft;
 - the capped rental rate of £15/sq.ft will be inclusive of service charges;
 - no part of the self storage can be occupied until the affordable workspace has been fitted-out to the agreed specification ready for occupation; and
 - a Full Management Plan and a Full Marketing Strategy, both to be secured in advance of the marketing period and first operation of the workspace.
184. For the reasons given above, the proposed affordable workspace offer is policy compliant.

Publicly-accessible ancillary café, cycle workshop and exhibition space within the PBSA student amenity space

185. The proposed Sui Generis use for the unit at the base of PBSA building is a factor of the café being within the demise of the PBSA and forming part of the PBSA amenity space offer (and thus technically being a Sui Generis use). At least at 'day 1' of the development becoming operational, the café would be staffed and managed by the PBSA operator. The café would be open to the wider public as well as students. To be managed by the PBSA operator, the café was proposed by the applicant as a direct response to feedback from pre-application meetings with officers and the Community Review Panels.
186. The café would complement the 7,977 square metres of non-residential uses proposed on the Ilderton Road and Sharratt frontages, while also supporting the restaurant offer across the wider town centre. Additionally, the unit would help draw members of the public into the heart of the site and improve activation by providing an extensive glazed frontage onto this Ilderton Road and Sharat Street junction. This public facing café would also serve a community integration role, being a place where the future student residents can meet and interact with the wider community. It is therefore supported by policy at all levels.
187. The publicity accessible cycle workshop located within the PBSA will also be part of the PBSA amenity space offer. The applicant is committed to find an operator to provide bike repair service. This would be secured through a Section 106 Agreement.
188. The applicant is also committed to provide 50 square metre exhibition space within the ground floor of the development to local community for 200 hours per year. The exhibition space is considered to be ancillary to the PBSA and light industrial uses.

Conclusion on uses

189. The proposed land uses are on balance appropriate in policy terms for this site within the Old Kent Road Opportunity Area. The introduction of PBSA would facilitate the growth of the borough's education offer. The provision of on site affordable housing would have made a more significant contribution to the delivery of a mixed and inclusive neighbourhood, and the applicant originally pursued that approach, but viability challenges have resulted in the offer of a PIL in order to secure the sites redevelopment. A community café and cycle hub within the development will be publicly accessible, and free exhibition space will be offered to the local communities for at least 200 hours every year. These would also contribute to the creation of a mixed and inclusive community within this part of the Opportunity Area.
190. The self storage and Fab-Labs would be complementary to, and would co-exist well with, the proposed residential uses. These units would activate the Ilderton Road and Sharratt Street frontages. The provision of 1,030 sqm affordable workspace in the form of Fab-Labs would exceed the affordable workspace policy minimum requirements. The proposals, in providing a mix of residential and employment-generating uses, meet the expectations of the Southwark Plan and draft OKR AAP site allocations.
191. The range of proposed uses will generate new jobs and revitalise this longstanding under-optimised site. The proposed development would provide essential employment opportunities, place-making and public realm for both future and existing communities. In conclusion, the proposed uses are on balance considered to be acceptable.

Affordable housing and development viability

Policy background

192. National, regional and local planning policies place a high priority on the delivery of affordable housing as part of the plan led approach to addressing the housing crisis. Southwark's Strategic Housing Market Assessment (SHMA) identifies a need for 2,077 social rent and intermediate homes per annum which is approximately 71% of Southwark's total housing need. The SHMA suggests that approximately 78% of the total affordable housing need is for intermediate housing to meet the housing needs of lower and middle income residents. However, the most acute need is for social rent housing to meet the needs of homeless households living in unsuitable temporary accommodation such as bed and breakfasts or overcrowded conditions.
193. The Southwark Plan includes a Fast-Track route. The relevant policy, Policy P1, states that a detailed interrogation of viability will be waived only where a development provides 40% affordable housing in a policy compliant tenure mix (i.e. a minimum of 25% social rent and a minimum of 10%

intermediate housing), with no grant subsidy. The 40% Fast-Track threshold is calculated on a habitable room basis.

194. Southwark Plan Policy P5(2) states that purpose built student housing when providing direct lets at market rent must provide the maximum amount, with a minimum of 35% as conventional affordable housing by habitable room subject to viability, as per policy P4, as a first priority. In addition to this, 27% of student rooms must be let at a rent that is affordable to students as defined by the Mayor of London.
195. Alternatively, P5(3) states that when providing all of the student rooms for nominated further and higher education institutions, provide the maximum amount of affordable student rooms with a minimum of 35% subject to viability. The affordable student rent should be set as defined by the Mayor of London.
196. The Southwark's Development Viability SPD, in requiring an in lieu payment of £100,000 per habitable room of conventional affordable housing, effectively establishes the minimum payment-in-lieu a scheme should deliver. However, the policy expectation, as per Southwark Plan Policy P5, is for development proposals to deliver the maximum viable amount. It should also be noted that the SPD does not provide an in lieu figure for affordable student housing, as the SPD was drafted before the current London Plan policy was adopted. A new S106 SPD has just been consulted on, but as the consultation has only just finished it has very little material weight. Nonetheless the new SPD does propose a higher per habitable room payment of £135,000 per room.

Assessment – Eligibility of Fast Track threshold

197. An earlier part of this report entitled 'Principle of the proposed development in terms of land use' detailed the policy context for student housing proposals, and explained that Policy P5 takes precedence over the counterpart London Plan student housing policy. The policy provides two avenues for applicants to follow, one for schemes that are entirely direct let (this is P5(2) and one for schemes that are nominations (this is P5(3)).
198. The applicant initially proposes that 35% of the student beds would be affordable student accommodation, which would meet the Mayor's Fast-Track threshold. However, given the Council's priority to deliver conventional affordable housing, upon the request from Southwark officers, the applicant has revised the scheme to instead deliver a 100% direct-let scheme with a payment-in-lieu towards off-site affordable housing.
199. In order for the PBSA schemes with affordable housing payment-in-lieu to meet the Council's Fast-Track threshold, the payment-in-lieu is required to be at least 40% of the proposed number of habitable rooms in the PBSA. GLA officers have confirmed that for PBSA schemes delivering off-site conventional affordable housing via a PIL would need to meet the

Southwark's 40% requirement in order to qualify the Mayor's Fast Track threshold.

200. Since the proposed development does not offer at least 35% on-site affordable student accommodation or 35% conventional affordable housing or affordable housing payment-in-lieu equivalent to at least 40% of the habitable rooms in the PBSA, the proposed development does not meet the Southwark and Mayor Fast Track thresholds.

Assessment of maximum viable amount of payment-in-lieu

201. The applicant has submitted a Financial Viability Assessment (FVA) in accordance with the Affordable Housing SPD and Southwark Plan Policy P5 to allow an assessment of the maximum level of affordable housing that could be supported by the development. The appraisal was reviewed by BNP Paribas on behalf of the Council.
202. Officers and BNP Paribas have scrutinised the assumptions used in the FVA and have substantial discussion with the applicant. The applicant's latest FVA concludes that the proposed development can only afford an affordable housing payment in lieu of circa £5m. Reviewing further evidence on construction costs, Operating Expenses or Expenditure (OPEX) and the yield for the PBSA have been provided, BNP Paribas has confirmed that a 35% affordable housing provision of £20,720,000 as an in-lieu payment to the Council (equates to 207.2 habitable rooms) to use for providing affordable housing is the maximum viable amount subject to early and late-stage reviews. The applicant has agreed on this amount of the affordable housing PIL which would be secured through a S106 agreement.

Review mechanisms

203. The Section 106 Agreement will secure an Early Stage Review in the event of implementation being delayed for more than two years, as well as the Late Stage Review, in accordance with Policy H5 (F) (2). As student housing is not typical 'for sale' housing, and the value relies on the rent levels achieved, it is proposed that the Late Stage Review be carried out after the first full academic year of occupation of the development.

Conclusion on affordable housing and development viability

204. The London Plan and Southwark Plan contain policies seeking the maximum reasonable and financially viable amount of affordable housing in proposed developments. These policies at London and borough levels allow for a commuted sum in exceptional circumstances, and the NPPF acknowledges that there may be circumstances where a payment-in-lieu can be justified. Where it is clear that a payment-in-lieu approach would deliver more (and more appropriate) affordable housing, a commuted sum is acceptable.

205. The payment in lieu of £20.72 million index-linked offered by the applicant is substantial and could contribute to delivering affordable housing through its Council Homes Building Programme. The acceptability of the offered payment-in-lieu is based on the specific merits of this proposal, taking account of all the material considerations highlighted above. It is considered that the Council Homes Building Programme is a more effective way to provide conventional affordable housing under current economic climate, to the extent that any departure from the on-site preference of the NPPF, London and Southwark Plan is justified (for the above reasons based on the specific merits of this student housing proposal). The PIL would be required to be paid 25% on implementation of the scheme, 50% on completion of the scheme and 25% 6 months post first occupation of the scheme.

Quality of residential accommodation

Policy background

206. Although student housing falls within the Sui Generis use class, it comes with many of the same functional, amenity and environmental requirements as conventional residential development. As such, it is necessary to give regard to the development plan policies concerned with residential uses when considering the acceptability of student housing proposals.

207. The Southwark Plan does not prescribe any minimum space standards with respect to student accommodation. Policy P15 “Residential Design”, which sets out the standards for new homes generally and includes a 17-point criteria, is clearly designed for conventional residential housing. Nevertheless, it is not unreasonable to expect student housing proposals to achieve some of those criteria, namely:

- Criteria 1 - Provide a high standard of quality of accommodation for living conditions;
- Criterion 6 - Provide acceptable levels of natural daylight by providing a window in every habitable room;
- Criterion 7 - Achieve a floor to ceiling height of at least 2.5 metres for at least 75 per cent of the Gross Internal Area of each dwelling to maximise natural ventilation and natural daylight in the dwelling; and
- Criterion 14 - Provide communal facilities.

208. There are no other local-level requirements that student housing proposal should meet in terms of quality of accommodation.

Spatial arrangement

209. Three different ‘bedspace’ formats are proposed. 81.1% of these (480 of the 592) would take the form of a 13 – 17.5 square metre GIA private en-suite bedroom within a cluster flat, where the occupiers would share an open-plan communal kitchen, living and dining space. The bedrooms would be furnished with a queen size bed, a desk and storage space. The square meterage of the open-plan communal space varies depending on the particular floor of the

building on which the cluster flat is located, as well as in some instances the number of bedspaces within the flat. Majority of these kitchen/living/dining spaces would be more than 27 square metres, with some in excess of 35 square metres and shared by either 6 or 8 occupiers. 8 kitchen/living/dining spaces would be 23.5 square meters which will be shared by 6 occupiers.



Image 16: Left: Typical layout of the shoulder block (2/F – 9/F), showing the dual aspect nature of the communal kitchen/living/dining spaces of the cluster flats in the Core A (West Core). **Right:** Typical layout of the tower block (12/F – 18/F), showing the dual aspect nature of the communal kitchen/living/dining spaces of the cluster flats

210. The other two 'bedspace' formats proposed are regular studios and accessible studios. The studio typology is a self-contained apartment equipped with a shower room and all the necessary facilities to meet the sleeping, living and food preparation needs of the individual occupier. 82 regular studios and 30 accessible studios are proposed.
211. With regard to the accessible studios, these would range in size from 24.5 to 30.8 square metres GIA. The premium studios are generously proportioned and would provide very good levels of residential amenity for the occupiers.
212. The regular studios would range in size from 18.7 to 22.2 square metres GIA. Although these particular unit types are of an efficient configuration, the layouts submitted as part of the planning application include furnishings to illustrate how queen-sized beds, a desk and storage space could be accommodated in a way that would not be cramped or impractical for use.

The occupier would be expected to dine at their desk. On balance, and taking account of the level of internal communal facilities provided within the PBSA buildings that would supplement the private individual accommodation, the regular studios are considered to be of an adequate size and layout.

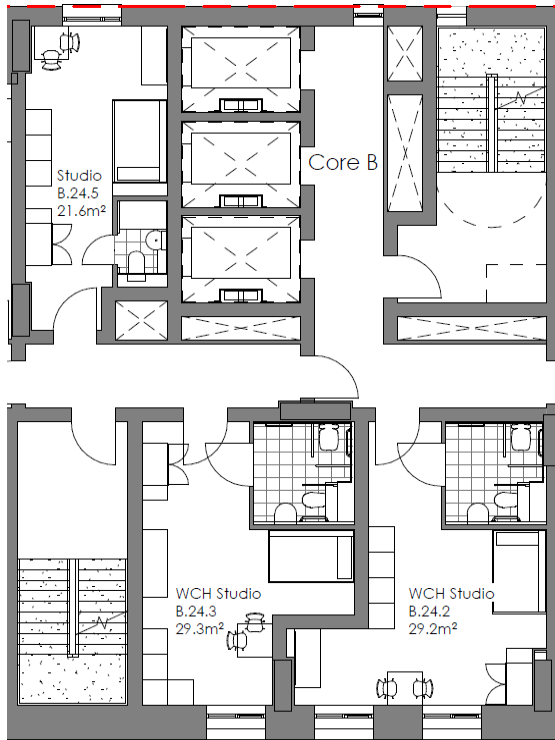


Image 17 Typical layout of the two types of studio

213. All of the accommodation typologies would achieve at least 2.5 metre floor-to-ceiling heights, which is in accordance with Policy P15. This would contribute to the sense of space within these dwelling units.

Environmental comfort

214. The Noise and Vibration Assessment submitted with the application outlines how, through a suitably designed façade and ventilation strategy, the building façade would ensure appropriate internal noise conditions are achieved. Conditions are recommended requiring pre-occupation testing of the separating floors and walls to demonstrate that the relevant acoustic performance standards, as prescribed by the Building Regulations, have been met. This will ensure that the occupiers of the dwellings do not experience excess noise, transmitted either vertically or horizontally, from adjacent sound sources.

Aspect, outlook and sense of openness

215. Outlook, sense of openness and privacy are all very important considerations for student housing proposals, as unlike conventional housing which provides occupiers with multiple rooms and a variety of outlooks, the bedrooms would be in many cases the only space inhabited by the occupiers, and they would do so for much of the year.

216. It is noted that majority of the bedrooms of the cluster flats and studios would be single-aspect. Where achieving dual aspect has not been feasible, opportunities have been taken where possible to provide these habitable rooms with two windows and 49 of the bedspaces being dual aspect. 75% of the living/kitchen/dinning spaces of the cluster flats (i.e. 48 out of.64) would be dual aspect.
217. For the reasons set out above, and recognising the site's Opportunity Area location and the attendant policy imperative to optimise density through a design-led approach, the outlook and sense of openness for all PBSA occupiers would be acceptable on balance.

Privacy

218. With regard specifically to preventing harmful overlooking of dwellings, the 2015 Technical Update to the Residential Design Standards SPD 2011 requires developments to achieve:
- a distance of 12 metres between windows on a highway-fronting elevation and those opposite at existing buildings; and
 - a distance of 21 metres between windows on a rear elevation and those opposite at existing buildings.
219. While the above guidelines are helpful in informing decisions about privacy impacts, it is important to recognise that the recommended distances can be applied more flexibly where the rooms under assessment are all proposed (i.e. none are existing).
220. It is noted that the distance between the living/kitchen/dining spaces of the clusters flats in the shoulder block would be 4.9m only which would not meet the guidelines of the Residential Design Standards. However, the applicant has intentionally staggered the western facades to break up the frontages along the Ilderton Road and allow dual aspect of the living/kitchen/dining spaces of the cluster flats. Given the urban context and the other benefits mentioned above, no harmful overlooking is anticipated for any of the PBSA occupiers.

Wheelchair rooms

221. The Building Regulations make clear that student accommodation is to be treated as hotel/motel accommodation for wheelchair specification purposes. As such, Policy E10(H) is the relevant policy to apply in assessing compliance of PBSA wheelchair proposals, as has been clarified by GLA Practice Note 'Wheelchair Accessible and Adaptable Student Accommodation' dated November 2022. In respect of the 592 bedspaces proposed, 30 would be provided to M4(3) standards.
222. Representing 5% of the total number of bedspaces, the wheelchair unit provision would meet the numerical requirements of Southwark Plan Policy

P5. In locational terms, the units would also meet policy requirements, being provided across various floors. This would help achieve social integration.

223. The M4(3) units would ensure options are available for potential wheelchair occupiers who need to move in immediately and could not wait for adaptation works to be carried out (e.g. those have gone through clearing and are applying for accommodation just before the start of term). The wheelchair user accommodation is to be secured through the Section 106 Agreement.

Internal communal facilities

224. In addition to the private and shared spaces within the units themselves, internal communal amenity spaces are proposed. These would be distributed throughout the building to offer a range of different spaces for communal amenity. A series of dining spaces, lounges and gyms are proposed to provide space for occupiers to be social and active. Study spaces incorporating libraries are proposed on the second and third floors of Buildings A and B to facilitate quiet study spaces. Building A would also include a cinema/screening room. The café located on the ground floor represents part of the student amenity offer, however will be publicly accessible.
225. The size of these facilities and their distribution across the two buildings are summarised below:

Internal communal facilities within the PBSA: Summary table		
Floor	Facility	Size (sq. m)
00	Café	109.6
00	Lounge	185.8
01	Student Study Room	168.2
07	Yoga Studio	36.7
08	Cinema room	90
09	Gym	89.4
10	Student Sky Lounge	85.3
Total:		765
Average per PBSA bedspace:		<u>1.29</u>
<i>Not included in calculation</i>	<i>Back-of-house space including laundry facilities, toilets, storage, parcel store, reception/office etc.</i>	

226. As the above table shows, these internal communal amenity spaces would provide on average 1.29 square metres per student. It is noted that this is slightly lower than the levels of internal communal amenity space provided on other student schemes across London and the borough. However, this is primarily because the proposed Student Sky Lounge will have double floor

to ceiling height, which would provide a higher quality of internal community space overlooking the sky garden and is supported. Had this Student Sky Lounge been designed as internal community spaces across two standard floor levels, then the average internal amenity space per student would have been 1.44 square metres, which would be on a par with on other student schemes.

227. Although all the communal amenity facilities would be provided on the lower storeys of the buildings, meaning those residing in studios and cluster flats on the uppermost floors would be some distance away, the facilities need to be concentrated at the base of the buildings for fire safety reasons. In any case, residents living on storeys towards the tops of the buildings would in all probability access the facilities using elevators rather than the staircases, and as such their journey time would be short.



Image 18: (from top-left to bottom-right): Layout of Levels 00, 01, 07, 08-09 and 10 of PBSA building showing how the internal communal facilities would be arranged and the Sky Bar Terrace on Level 10.

228. For the reasons given above, it is considered that a good level and range of internal communal facilities would be provided for the PBSA residents.

Access to outdoor space

229. The proposed PBSA would include Sky Bar Terrace on the 10th floor of the PBSA building exclusively for the student residents. In response to the feedback from the Community Review Panel, the applicant has further

increased the area of Sky Bar Terrace to 274.4 m² which would be overlooked by the internal Student Sky Lounge. This outdoor amenity space would be equipped with seating, soft landscaping, boundary treatments and lighting (details to be secured by conditions). The submitted Noise Impact Assessment has demonstrated that the external sound level of this external amenity space will be below 55 dB LAeq based on the results of the noise modelling, meeting the criteria set out in the standards. In addition, the applicant has agreed to contribute towards publicly open space in the OKR OA (See also 'Off-site (Old Kent Road Opportunity Area) public open space' section).



Image 19: Evening visualisation of the Sky Bar Terrace and Student Sky Lounge

Conclusion on quality of residential accommodation – PBSA

230. The proposal would achieve good quality living accommodation for students. A range of room sizes and shared facilities is proposed, achieving overall acceptable levels of environmental comfort. There has been clear consideration of accessibility, and a financial contribution towards investment in nearby public open space would be secured.
231. For the reasons given above, the proposed PBSA would comply with London Plan Policy H15, while also meeting the four relevant criteria of Southwark Plan Policy P15.

Impact of proposal on development potential of nearby land

232. Southwark Plan Policy P18, which is concerned with the efficient use of land, states that development will be permitted where it would not unreasonably compromise development potential or legitimate activities on neighbouring sites.

Amenity impacts on nearby residential occupiers and the surrounding area

233. The importance of protecting neighbouring amenity is set out in Southwark Plan Policy P56, which states “development should not be permitted when it causes an unacceptable loss of amenity to present or future occupiers or users”. The 2015 Technical Update to the Residential Design Standards SPD 2011 expands on policy and sets out guidance for protecting amenity in relation to privacy, daylight and sunlight.

Daylight and sunlight

234. The NPPF sets out guidance with regards to daylight/sunlight impact and states “when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site”. The intention of this guidance is to ensure that a proportionate approach is taken to applying the BRE guidance in urban areas. London Plan Policy D6 sets out the policy position regarding this matter and states “the design of development should provide sufficient daylight and sunlight to new and surrounding houses that is appropriate for its context”. Policy D9 states that daylight and sunlight conditions around tall building(s) and the neighbourhood must be carefully considered. Southwark Plan policies identify the need to properly consider the impact of daylight/sunlight without being prescriptive about standards.
235. The BRE Guidance sets out the rationale for testing the daylight impacts of new development through various tests. The first and most readily adopted test prescribed by the BRE Guidelines is the Vertical Sky Component assessment (VSC). This test considers the potential for daylight by calculating the angle of vertical sky at the centre of each of the windows serving the residential buildings which look towards the site. The target figure for VSC recommended by the BRE is 27%, which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE have determined that the daylight can be reduced by approximately 20% of the original value before the loss is noticeable.
236. The second method is the No Sky Line (NSL) or Daylight Distribution (DD) method, which assesses the proportion of the room where the sky is visible, and plots the change in the No Sky Line between the existing and proposed situation. It advises that if there is a reduction of more than 20% in the area of sky visibility, daylight may be affected.

Properties assessed for daylight impacts

237. This planning application was accompanied by a daylight, sunlight and overshadowing (DSO) assessment undertaken in accordance with the BRE guidelines. The document assesses the extent to which the proposed development would affect the dwellings in the following buildings:

- a. 227 - 255 Ilderton Road

- b. Olive Tree House
- c. Upnall House

238. The above three properties were tested for VSC and NSL impacts, but not illuminance as this method is more appropriately applied to new buildings.

239. The DSO report also undertook testing of:

- d. 14 Sharratt Street (Sankofa Day Nursery) ;
- e. Christ The King Chapel;
- f. 214 Ilderton Road;
- g. 212 Ilderton Road;
- h. 206 – 210 Ilderton Road;
- i. 202 Ilderton Road; and
- j. Canterbury Industrial Estate

240. However, these buildings are non-domestic buildings so even though a number of the rooms/windows do not pass the numerical tests, this does not amount to non-compliance with the BRE requirements

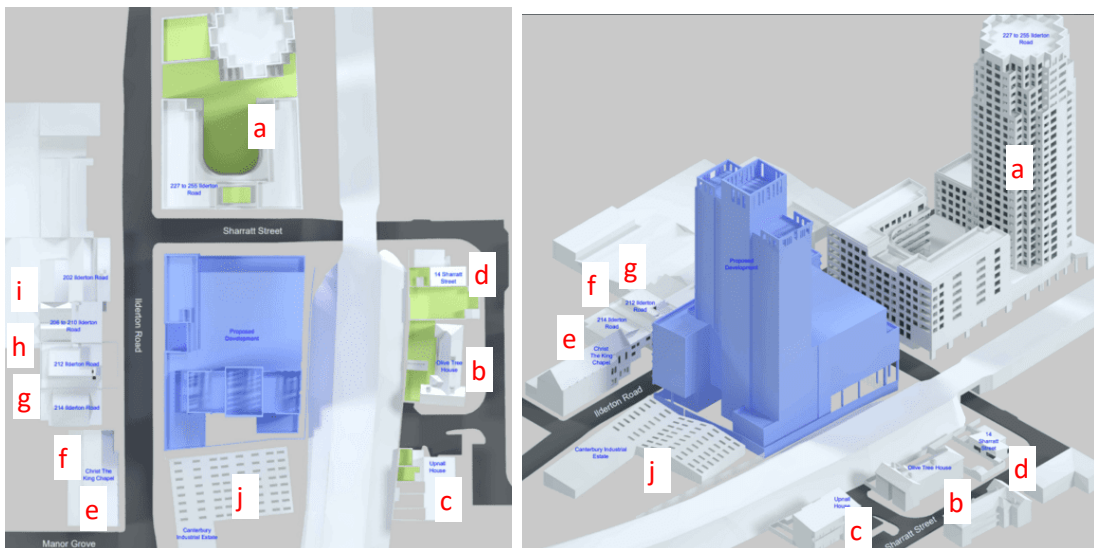


Image 20: Plan of the site within its existing context

VSC and NSL impacts for sensitive surrounding residential properties

241. The table below summarises the VSC impacts to surrounding properties as a result of the proposed development being built-out in the present day context.

Residential Property	Number of windows that would experience a VSC reduction (as a percentage of the baseline VSC value)			
	No loss or a loss of up to 19.9%	20%-29.9% (minor adverse impact)	30%-39.9% (moderate adverse impact)	40% + (substantial adverse impact)

227 - 255 Ilderton Road				
Total no. habitable windows tested: 809				
<ul style="list-style-type: none"> • Of the 809 windows, 238 would retain a VSC of 27% or more. • For the <u>571</u> that would not, the distribution of percentage reductions is: 				
Proposed vs existing	442	12	14	103
Olive Tree House				
Total no. habitable room windows tested: 28				
<ul style="list-style-type: none"> • Of the 28 windows, 2 would retain a VSC of 27% or more. • For the <u>26</u> that would not, the distribution of percentage reductions is: 				
Proposed vs existing	1	6	11	8
Upnall House				
Total no. habitable room windows tested: 11				
<ul style="list-style-type: none"> • Of the 11 windows, 8 would retain a VSC of 27% or more. • For the <u>3</u> that would not, the distribution of percentage reductions is: 				
Proposed vs existing	1	2	0	0

242. The table below summarises the NSL (also known as ‘daylight distribution’) impacts to surrounding properties as a result of the proposed development being built-out in the present day context.

Residential property	No. windows that would experience a reduction in NSL (as a percentage of the baseline NSL value)			
	No loss or a loss of up to 19.9%	20%-29.9% (minor adverse impact)	30%-39.9% (moderate adverse impact)	40% + (substantial adverse impact)
227 - 255 Ilderton Road				
Total no. habitable rooms tested: 424				
Proposed vs existing	366	19	9	30

243. The DSO report does not include the NSL results for Olive Tree House and Upnall House. BRE guide (Appendix D) states that the daylight distribution calculation can only be carried out where room layouts are known. Using estimated room layouts is likely to give inaccurate results and is not recommended. Both properties are part of the Lewisham’s Council block and no

internal layout plans of the flats are available.

227 - 255 Ilderton Road

244. 103 windows assessed at 227 - 255 Ilderton Road would undergo a severe loss of VSC. However, 26 of these serve non-habitable rooms or staircases. Out of the 77 affected habitable rooms windows, 48 of them have a low existing VSC value of lower than 27% as daylight is restricted by its own building design. Some of these windows are recessed from the main elevation and some face onto the 9-storey southern should block which sits south of the podium. All of the remaining 29 affected windows would retain an absolute level in excess of 15%, which is not especially low for an urban environment. 12 and 14 windows would be impacted to a minor adverse and moderate adverse level respectively, which would all retain VSC levels not unusual in inner London.
245. In terms of the second daylight assessment, the NSL, the results record 30 rooms assessed would undergo severe loss of NSL. However, 2 of these rooms are non-habitable rooms. 26 of these rooms are bedrooms which tend to be less daylight reliant. The 2 living/dining/kitchen rooms adversely affected are located on the second floor in the middle section the southern shoulder block facing the proposed development. 19 and 9 habitable rooms would undergo a minor adverse and moderate adverse reduction in NSL respectively.
246. It must acknowledge that the proposed scheme has been designed to have a similar shoulder block height and set-back from the footway along Sharratt Street. The commercial building has been further set back at the 6th floor level. In addition, the tower PBSA block is set back substantially from 227 - 255 Ilderton Road.
247. For these reasons, whilst it is acknowledged that the proposed development would result in some reduction in daylight to some occupiers of the 227 - 255 Ilderton Road, the proposed development has been designed to minimise the impacts on these properties whilst optimising the site capacity of the brownfield land to deliver a mixed-use development. On balance, it is therefore considered that the impacts on these occupiers would be acceptable.

Olive Tree House

248. While there would be a large number adverse reductions to VSC at Oliver Tree House, these adversely affected windows are located on the ground floor and first floors and have a low existing VSC value of between 11.9% and 14.9% largely due to the existing deck access. While the impacts are recognised, on balance the retained daylight level would be acceptable having regard to the site location.



Image 21: *Aerial photo of Oliver House showing the existing deck access*

Upnall House

249. Only two windows tested would not meet the BRE default VSC target and they would all constitute 'minor adverse' transgressions. When considering the retained levels of VSC for most of the Upnall House, the effects of the proposed development would not be harmful to the amenity of the Upnall House residents.

Sunlight

250. The applicant's DSO report has assessed the impact of the proposed development on the sunlight received at all windows facing within 90 degrees of due south. The BRE guide states that nearby windows must be assessed using the three-stage process set out below to determine if, as a result of the development, the sunlight levels would reduce to an extent that the room may feel colder and less pleasant.

251. The first stage is to determine if the window would experience:

- a reduction in sunlight to less than 25% Annual Probable Sunlight Hours (APSH); or
- a reduction in sunlight to less than 5% Winter Probable Sunlight Hours (WPSH); or
- both of the above.

252. If one of the above criteria is triggered, the next stage is to determine if:

- the window's resulting APSH is less than 0.8 times its former value; or
- the window's resulting WPSH is less than 0.8 times its former value; or
- both of the above.

253. Where one of the criteria in Stage 2 is met, the final stage is to determine if the overall loss of sunlight across the whole year would reduce by more than 4% of APSH.

254. The 10 properties assessed for daylight impacts have also been assessed for sunlight impacts; none of these properties no breaches of the BRE guidelines were recorded.

Conclusion on daylight and sunlight

255. In total, the development would result in 20 minor, 25 moderate and 111 substantial adverse reductions in VSC for surrounding properties. With respect to NSL, among the properties assessed, there would be 30 substantial reductions for flats at 227-255 Ilderton Road which is undergoing construction (known as the Leatham's scheme). These exceedances of the BRE guidance, and the negative impact they would have on neighbour amenity, should be given

some weight in determining the application.

256. Regarding sunlight, none of the residential properties would experience impacts beyond the recommendations of the BRE.
257. Given the site's location within the Old Kent Road Opportunity Area, where more intensive development is expected and where the BRE guidelines should be applied flexibly following the design-led approach to density promoted by the London Plan, the impacts are on balance acceptable. As noted above, the BRE guidelines are not mandatory and the advice within the guide should not be seen as an instrument of planning policy. While some noticeable relative changes in daylight amenity would occur at a number of residential properties surrounding the site, the retained daylight levels would be commensurate with those typical to other Growth and Opportunity Areas across London. There are also a large number of residential properties surrounding the application site that will satisfy the recommendations of the BRE Guidance in that they will not experience any noticeable alterations in daylight or sunlight as a result of the implementation of the proposed development.

Solar glare

258. During the course of this application, the applicant has confirmed that the black cladding proposed on the façade of the commercial building will have a matte finish and therefore will not present a glare issue on the neighbouring Leatham's scheme. Any advertisement on the commercial building will also be subject to a separate advertisement consent application. It is therefore considered that any harmful environmental effects caused by the development in respect of solar glare would be unlikely.

Overshadowing

259. The test promoted by the BRE for assessing overshadowing impacts on external amenity spaces is the 'Sun on Ground' assessment. This models the proportion of an outdoor amenity space where the sun would reach the ground on 21st March each year. On that date, the BRE advises that at least 50% of the area tested should receive a minimum of two hours of sunlight. If as a result of new development an existing garden or amenity area does not meet the above, and the area which can receive two hours of sunlight on 21 March is less than 0.8 times its former value, then the loss of light is likely to be noticeable.
260. The DSO assesses all surrounding private amenity areas for overshadowing impacts and finds that majority of them achieve 50% sunlight coverage for two hours on the Equinox or retain 0.8 times their former values, as set out in the BRE Guideline with exception of the communal podium garden at 227-255 Ilderton Road.
261. This communal garden is located on the second floor and is partially enclosed by a U-shaped, nine-storey shoulder block, which reduces sunlight in the southern part of the garden. The proposed development (23/AP/1317) is

expected to further decrease the area receiving two hours of sunlight on 21 March from 45% to 32%. While this reduction in sunlight is not ideal, the proposed development has been designed to minimise its impact by placing the tower block away from the garden. It is anticipated that a reasonable amount of sunlight will still reach the communal garden, particularly during the summer months when overshadowing will be less pronounced and the garden is more frequently used. The impact would not be detrimental to the living condition of the occupiers of 227-255 Ilderton Road. It is therefore considered no external amenity areas at nearby properties would be subject to harmful overshadowing.

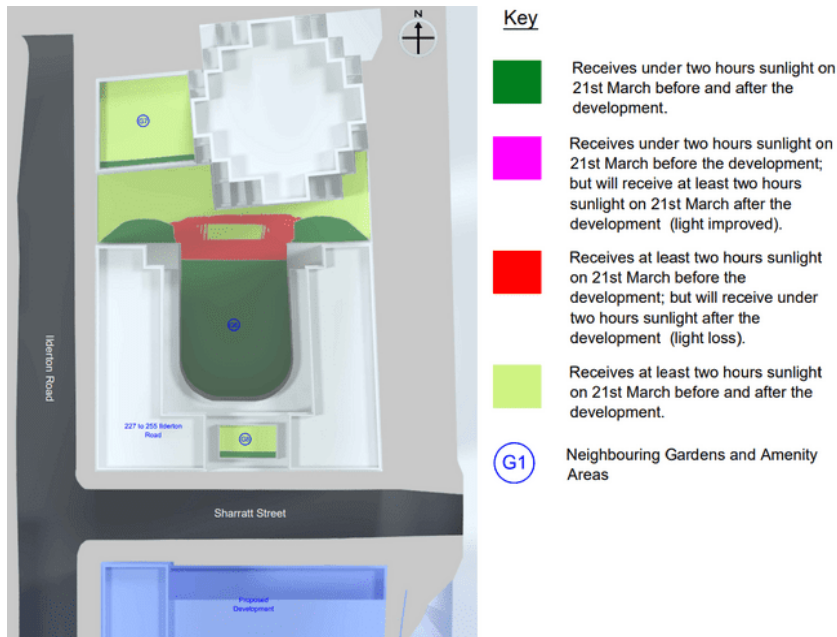


Image 22: Overshadowing to the podium at 227-255 Ilderton Road.

Outlook and sense of enclosure

262. The site is located within the Old Kent Road Opportunity Area, where there is an expectation for greater densities and taller buildings to come forward, changing the urban grain of the locality. The proposed development would introduce to the site an L-shaped shoulder block and a tower block. The tower block will be sited substantially away from the tower block at 227 – 255 Ilderton Road. Hence, views ‘through’ would be possible, opening up views of the sky for residents of the existing nearby dwellings. Incorporation of high quality materials and low-level greening throughout the development would give complexity and visual relief to building forms, which would have a positive effect on the surrounding properties’ outlook. As such, it is not considered that any of the surrounding dwellings that look towards the site would experience a harmfully diminished quality of outlook or sense of openness as a result of the proposed development.

Privacy

263. With regard specifically to preventing harmful overlooking of dwellings, the 2015 Technical Update to the Residential Design Standards SPD 2011 requires developments to achieve:

- a distance of 12 metres between windows on a highway-fronting elevation and those opposite at existing buildings; and
- a distance of 21 metres between windows on a rear elevation and those opposite at existing buildings.

264. All the 'across street' distances between the development and habitable residential rooms opposite would exceed 12 metres. The closest distance between the proposed development and any neighbouring residential building is 15 metres (to the flatted development at 227-255 Ilderton Road) The separation distance from the proposed development to Oliver Tree House would be 25 metres. In summary, since the guidelines of the Residential Design Standards would be achieved, no privacy infringement issues are raised.

Management and maintenance of the PBSA

265. The Council's 2015 Technical Update to the Residential Design Standards requires student housing proposal to be accompanied by details of the long-term management and maintenance arrangements of the student accommodation, including details of security. This is in the interests of ensuring that, once operational, the development:

- does not generate adverse neighbour amenity or local environmental impacts;
- is managed and maintained to ensure the continued quality of the accommodation, communal facilities and services; and
- will positively integrate into the surrounding communities

266. The PBSA units will be owned/operated by the applicant and managed by Fresh. A Draft Management Plan has been submitted in support of the planning application, which sets out how the proposed development will be managed and maintained. With regard to the management of the scheme, the Draft Management Plan makes the following main provisions:

- Anti-social behaviour:
 - operates a 4-tier escalation process to deal with anti-social behaviour and will work closely with the universities and their disciplinary procedures.
- Security
 - CCTV cameras in and around the building will be fed back to the management office to allow monitoring of incidents and potential incidents;
 - There will also be an electronic access control system to prevent unauthorised access into the flats; and

- 2-3 dedicated security staff will be employed for the site who will provide onsite out of hours service to the students.

267. On account of the above, it is considered that sufficient information has been provided to address the requirements of the SPD. A finalised version of the Student Management Plan will be secured through the Section 106 Agreement to ensure the day-to-day operation of the student accommodation would not cause harm to the amenity of surrounding residents.

Noise and vibration

Plant noise

268. Plant (power, heating and cooling machinery) would be contained within the ground of the commercial use building and ground floor and first floor levels of the proposed PBSA building. Both proposed buildings would also contain rooftop plant albeit the full details of plant are not currently known.
269. A condition is recommended requiring the plant not to exceed the background sound level (LA90 15min) at the nearest noise sensitive premises, and for the specific plant sound level to be 10 dB(A) or more below the representative background sound level in that location, all to be calculated fully in accordance with the relevant Building Standard. The condition is considered sufficient to ensure that the proposed plant will not have an unacceptably adverse impact on existing neighbouring residents or the users of the building.

Public noise nuisance

270. In terms of public noise nuisance from the development for surrounding residents, a Student Management Plan will be secured through the Section 106 Agreement to ensure the operation of the PBSA would limit sources of human noise disturbance to neighbours.
271. The only other potential sources of public noise nuisance are the proposed self storage (Use class B8) and light industrial Fab Labs (Use Class E(g)(iii)). In order to limit any risk of public noise nuisance, it is recommended that opening hours limitations be imposed on these non-domestic units as follows:
- 07:00-23:00 on Mondays to Sundays (including Bank Holidays).
272. A separate condition is proposed to control the hours of servicing/deliveries to these non-domestic uses as follows:
- 08.00 to 20.00 on Monday to Saturdays; and
 - 10.00 to 16.00 on Sundays and Bank Holidays.

Vibration

273. The Noise and Vibration Assessment indicates no adverse impact from potential vibration sources. The Environmental Protection Team has reviewed it and confirmed it is acceptable.

Odour

Extraction and ventilation equipment

274. During the course of this application, the applicant has introduced a café within the PBSA as suggested by the Community Review Panel. An updated Ventilation Statement has been submitted. It outlines a possible odour abatement scheme for the 'community café'. The Ventilation Statement suggests that the system will either be mounted at high level and connect to atmosphere via an architectural weatherproof louvre installed in the façade, or a ducted system routed to the level 14 roof. The Environmental Protection Team confirmed that the proposed outline scheme is suitable in principle and recommended specific details to be discharged once the details are known at a later stage of the development. A condition is therefore recommended to seek details of any extraction and ventilation system for approval prior to the installation of any such system in order to ensure the final ventilation specification is suitable while preserving the architectural integrity of the proposed development with its appurtenance-free façade which is considered to be of importance to the success of the development in terms of its townscape role.
275. Since there is a potential for the proposed light industrial units as commercial kitchens under general permitted development rights. For safeguarding purpose, upon the request from the Environmental Protection Team, a standard condition is also recommended to details of any extraction and ventilation system if such use arises.

Design

276. Paragraph 56 of the NPPF stresses the importance of good design, considering it to be a key aspect of sustainable development. Chapter 12 of the NPPF is the key national policy for design. In particular para 134 requires development to reflect local and national design policies, guidance and SPDs. It sets out that outstanding or innovative design should be given significant weight in decision making, and requires development that is not well designed to be refused.
277. Chapter 3 of the London Plan deals with design related matters. Policy D3 promotes a design-led approach to making the best use of land. Policies D4 and D8 build on this, setting out the design principles for ensuring new development makes a positive contribution in terms of architecture, public realm, streetscape and cityscape. Policy HC1 advises that development affecting heritage assets and their settings should conserve their significance by being sympathetic in their form, scale, materials and architectural detail.
278. London Plan Policy D9 is specifically concerned with tall buildings. The policy contains a list of criteria against which to assess the impact of a proposed tall building – namely locational, visual, functional, environmental and cumulative. London Plan Policy D4 requires all proposals exceeding 30 metres in height to have undergone at least one design review or demonstrate that they have undergone a local borough process of design scrutiny. The proposed building

would, at 70.67 metres above ground level, exceed the 30 metre threshold. It thus engages Policy D9.

279. The importance of good design is further reinforced by Policies P13 “Design of Places”, P14 “Design Quality” and P17 “Tall Buildings” of the Southwark Plan. These policies require all new developments to:

- be of appropriate height, scale and mass;
- respond to and enhance local distinctiveness and architectural character;
- conserve and enhance the significance of the local historic environment;
- take account of and improve existing patterns of development and movement, permeability and street widths;
- ensure that buildings, public spaces and routes are positioned according to their function, importance and use;
- improve opportunities for sustainable modes of travel by enhancing connections, routes and green infrastructure; and
- be attractive, safe and fully accessible and inclusive for all.

280. Specifically for tall buildings, Policy P17 requires:

- the location to be within a major town centre, an opportunity area and/or the CAZ, where tall buildings are appropriate;
- the location to be at an area of landmark significance;
- proposals to be of a proportionate height to the location and site;
- proposals to have a positive impact on the London skyline;
- proposals to respond positively to local character and townscape;
- there to be no harmful impact on strategic views;
- proposals to provide a functional public space; and
- the provision of newly publically accessible space near or at the top of the building where appropriate.

281. It also sets out that the design of tall buildings must:

- be of exemplary design and quality;
- conserve and enhance designated heritage assets and make a positive contribution to the wider townscape;
- avoid harmful environmental impacts;
- maximise energy efficiency; and
- have a positive relationship with the public realm, provide opportunities for new street trees, design lower floors to successfully relate to and create positive pedestrian experience, provide wider footways and accommodate increased footfall.

282. There are conservation areas and listed buildings in the vicinity of the application site, and the draft OKR AAP identifies buildings of townscape merit and architectural or historic interest nearby. The draft AAP identifies the cluster as an appropriate for a mix of Tier 1 (above 20 storeys), Tier 2 (16 to 20 storeys) and Tier 3 (up to 15 storeys) tall buildings, with an expectation that the height of

the tower would be the same as that in the Bermondsey Heights scheme at 227-255 Ilderton Road.

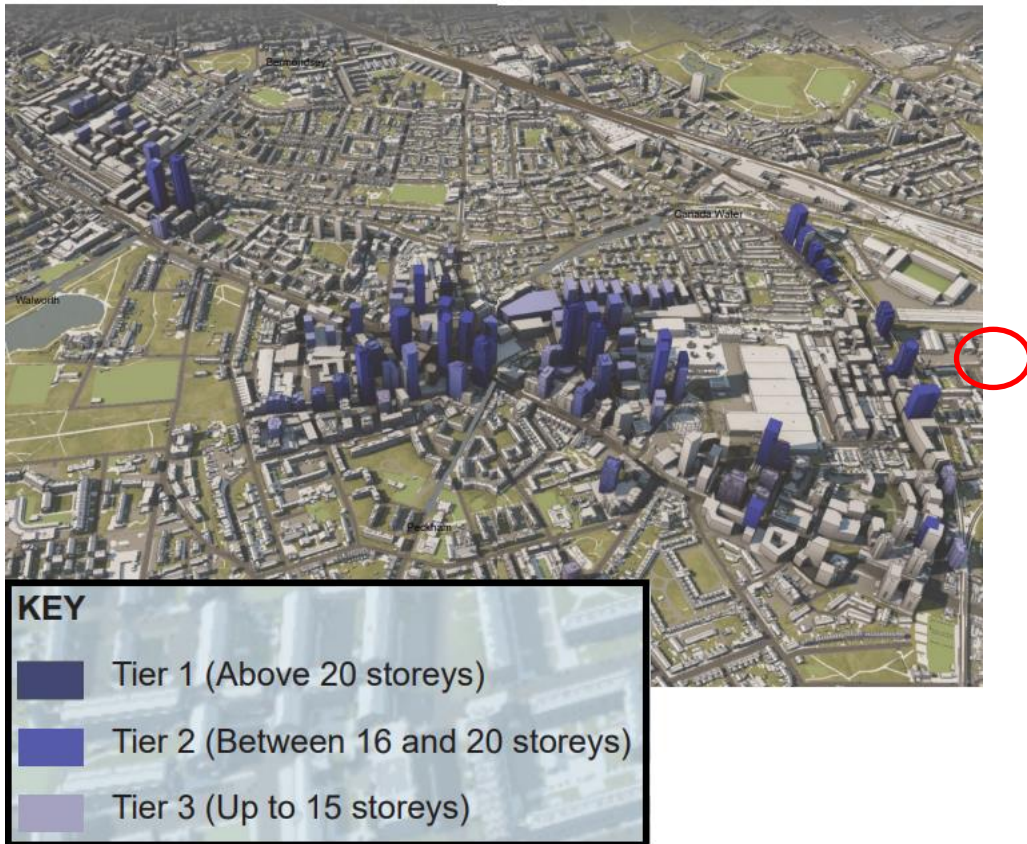


Image 23: (above): The Stations and The Crossings strategy from the draft Old Kent Road AAP, showing the distribution of tall buildings across the action area, including cluster at the new tube station where the site is located (circled in red), and these tall buildings' relationship to London and borough views.

Site layout and public realm

- 283. The existing urban grain is varied, featuring a mix of housing dating from various eras and in a range of formats and heights; and larger commercial warehouses. As previously mentioned, the application site is brownfield land within the Old Kent Road Opportunity Area. It is also subject to site allocations in the Southwark Plan and draft OKR AAP.
- 284. Characterised by a low-rise building, large areas of surface parking and high palisade fencing, the existing site makes no meaningful contribution to Ilderton Road or Sharratt Street.
- 285. The arrangement of the proposed buildings conforms broadly to the massing composition and guidelines in the draft OKR AAP, and is a logical response to the shape of the site. The proposed layout of the buildings would instate a strong urban edge, establishing positive frontages along the Ilderton Road and Sharratt Street. The buildings have been set back to enable the delivery of enhanced hard- and soft-landscaped public realm including new tree planting along Ilderton Road and Sharratt Street.

286. Entrances and public-facing non-residential uses have been located on the principal frontages (Ilderton Road and Sharratt Street). The PBSA lobbies and the entrances of all the Fab-Labs and self-storage would all bring activation at ground level. Further activation would come from the glazed frontages of the PBSA café and reception rooms. Cycle stores and ancillary uses have been appropriately located to minimise the extent of inactive frontage.
287. In summary, the proposed site layout is well conceived, providing improved frontages along the Ilderton Road and Sharratt Street with more generous public realm and enhanced soft landscaping. This aligns fully with the ambitions of the Southwark Plan to foster mixed and inclusive communities.

Height, scale, massing and tall building considerations

288. The application proposes two buildings – the PBSA block has a shoulder block height of 10 storeys with a tower which would be 30 storeys located in the southern part of the site. The commercial building will have a height of 5 storeys and rise to 10-storeys along Sharratt Street.
289. The tower block constitutes a Tier 1 building - which the draft OKR AAP identifies as acceptable. The tower is located at the site's southern site which would have the same height as that of the adjacent Bermondsey Heights scheme at 227-255 Ilderton Road and maximise the distance from the tower at 227-255 Ilderton Road. For these reasons, the proposal would broadly cohere the height strategy along eastern side of Ilderton Road envisioned in the draft AAP.



Image 24 (from left): West elevation and roof plan across Ilderton Road; Axonometric view across Ilderton Road.

290. With regard specifically to massing, during the course of this application, the applicant has revised the scheme to emphasize the proportionality of the tall building by providing a 4-bay frame across the body of the wings and expressing

the slenderer profile of the tower with the inclusion of a canopy to crown the building. As a result, the proposed buildings would possess a strong sense of verticality, attributable largely to their gridded frame reducing their apparent width.

291. The proposed strong and distinguished bases of the buildings would relate positively to the proposed public realm, their architectural detailing providing a human scale to the development and adding interest in close-range views. In longer-range and wider townscape views, the development is successful in providing further articulation to the massing and skyline.
292. As assessed in detail in a subsequent part of this report, it is not considered that this proposal, due to its height or scale, would result in substantial harm to designated London wide or local protected views.
293. With regard to policy compliance with London Plan Policy D9 and Southwark Plan Policy P17, the following aspects are of consideration:

Landscape contribution

294. The proposal provides a number of improvements to the existing streets, including the landscaping of Ilderton Road and Sharratt Street. These are considered to commensurate with the scale of development.

Highest architectural standard

295. The proposal would be a high quality new-build scheme, incorporating a pallet of robust and rich facing materials, brought together into a refined and striking architecture through careful detailing. Both buildings would successfully achieve a distinguished base, middle and top. The varied approach to the architectural design of the typologies will ensure the scheme makes a dynamic addition to the skyline. It would deliver high-performance PBSA housing as well as commercial floorspace. The architecture and detailed design is well considered, in both its appearance in immediate and longer-range views.

Relates well to its surroundings

296. At ground floor level, two-storey spaces would be provided, framing entrance spaces and providing glazed frontages onto the streets. The development ensures sufficient activation is provided, presenting accessible and welcoming entrances. Through the incorporation of glazing there will be a positive relationship between internal and external uses. The architectural design and composition of the buildings will aid legibility and wayfinding in mid-range and longer range views.



Image 25 (above): View looking on the western side of Ilderton Road

297. The proposed development responds positively, to the local character and will make a positive contribution to the townscape.

Positive contribution to the London skyline

298. The development would form part of a cluster of emerging large-scale buildings around the planned tube station, a number of which benefit from planning permission. The proposed scale of the development –with the heights stepping up from the Ilderton Road to the eastern part of the site towards the railway – is consistent with the heights promoted on this particular site in the AAP, and the ‘Stations and Crossings’ strategy more generally. The varied distribution of heights will facilitate an articulated skyline, defining a set of marker buildings to aid way finding.
299. The cumulative impact has been assessed as part of the applicant’s TVIA, which includes consideration of the proposed development within the cumulative context of existing proposed future developments and planning consents. The TVIA demonstrates that the scale, form and massing of the development would be consistent with the emerging context. By reason of the proposal’s massing and architectural treatment, its skyline contribution would be positive, providing a slender profile to the tallest block, with a well-articulated family of markedly lower buildings surrounding it.

Free-to-enter publicly-accessible areas

300. The proposals would deliver widened footways supplemented by planters and new street trees.

Mitigated environmental impacts

301. As part of the consideration of tall buildings' suitability, the London Plan requires interrogation of wind, daylight, sunlight penetration, air quality, noise and temperature conditions around the building(s) and neighbourhood. It expects these not to compromise comfort and the enjoyment of open spaces around the building. The technical reports assess these matters comprehensively, and conclude that with mitigation secured, no major adverse long-term effects would arise.

Conclusion on massing, height, scale and tall building considerations

302. In summary, although the proposed development –constituting a Tier 1 building and a Tier 3 building– would mark a step change in the scale of the immediate area's built scale, this is considered to be in line with the 'Stations and Crossings' building heights strategy in the draft AAP. Formed of a family of confident and carefully modelled buildings with activation of the streets, the development would repair a long-standing gap along Ilderton Road. It would play its role in delivering the series of tall building clusters planned along the Ilderton Road, while also making a beneficial contribution to the local townscape.
303. Overall, and having taken account of the effects arising cumulatively with other existing, consented and planned tall buildings nearby, the development's design would be exemplary, thereby meeting the policy criteria for a new tall building. However, a significant outcome of a tall building is its visibility and while this is not harmful in itself, the potential effects on the 'receptor' townscape and heritage assets are of special concern. These are discussed in later parts of this 'Design' section.

Architectural design and treatment

304. Southwark Plan Policy P14 sets out the criteria for securing high quality design. In respect of architectural design and materials the policy requires all developments to demonstrate high standards of building fabric, function and composition. Design solutions should be specific to the site's historic context, topography and constraints. They should also respond positively to the context using durable, quality materials that are constructed and designed sustainably to adapt to the impacts of climate change.
305. Through the use of common architectural language, the PBSA building and the commercial building are read as a coherent development. During the course of this application, the Applicant has further considered the junction between the PBSA and commercial building with a recess to create a clear break between the two uses.
306. To enable legibility across the development, the design and materiality of the ground floors would vary from the upper floors. The base of buildings accommodating the community café, PBSA lobby, communal amenity facilities, individual Fab Labs units and the self-storage entrance will be in black, grey brick with light mortar which would complement the bricks finishes of the upper floors. Canopies have been included for the entrances of the PBSA and Fab

Labs to improve legibility and add variation to the façade, as well as to avoid downwash effect (See also Micro-climate section).



Image 26 (above): Typical elevation of the buildings. (a) shoulder block of the PBSA (top-left), (b) the wings of the tower block (top-right) ; (c) central section of tower block (bottom-left); (4) Fab Labs (bottom-right)

307. The applicant has proposed a red brick mixture finish which would complement the prevailing exterior finishes in the area including the bricks used in the Christ the King Chapel on Ilderton Road opposite and the Bermondsey Heights at 227-255 Ilderton Road. Recessed windows and projecting brick overhang are employed to create variation in the facades of the buildings. The materials shown indicatively at this stage are high quality and robust, such that officers have confidence the appearance and architectural integrity of the building would be sustained through its lifespan.

308. To ensure the texture and interest of the elevational designs are carried through to the as-built scheme, conditions are recommended requiring sample panels of each material (including, in the cases of the bricks, the bond and mortar), as well as samples of the window and door frames.
309. Large scale bay studies have been provided with the submission to demonstrate design quality. Notwithstanding, a full set of detailed drawings will be secured by condition to ensure the delicate qualities and depth of the facades depicted in the application-stage drawings materialise in the as-built scheme. Additional to this, a condition is recommended requiring full scale mock-ups of the façade panels of the towers to be built on site and presented for officers' approval. A signage strategy will also be secured via a condition to ensure that high quality, consistent and coordinated signage is installed across all non-residential frontages within the development.
310. Overall, and with the abovementioned planning conditions enabling to officers to retain control over the detailed resolution, the proposal would achieve an exemplary quality of architectural design.

Heritage and townscape impact

Statutory designated heritage assets

311. The application site does not sit within a conservation area and it contains no listed buildings. There is however, one conservation area within 1km of the site, meaning that their settings could be impacted upon by the proposed development. The conservation area is listed below.

Table: Conservation areas within 1km of the application site

Conservation Area	Distance from Application Site
Caroline Gardens Conservation Area	Approximately 520m

312. Also within the area between the subject site and Caroline Gardens are a number of Grade II listed buildings and structures, including the following:
- Nos. 864 and 866 Old Kent Road;
 - Nos. 880, 882 and 884 Old Kent Road;
 - Licensed Victuallers Benevolent Institution (Caroline Gardens);
 - Licensed Victuallers Almhouses (Caroline Gardens);
 - Gasholders Nos.13

Non-designated heritage assets

313. These following buildings within or immediately adjacent to the application site are included on the Local List published by the Council in December 2023:

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

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

Townscape and Visual Impact Assessment (TVIA)

314. A Townscape and Visual Impact Assessment (TVIA) has been submitted in support of this application. A number of conservation areas and listed buildings fall within this radius, as do buildings on the local list. The ‘townscape’ element of the TVIA considers the impact of the proposed scheme from seven different viewpoints and includes consideration of cumulative impact.



Image 27 (above): Map showing the seven local verified viewpoints assessed in the TVIA

London Strategic views

315. The London View Management Framework (LVMF) (March 2012) identifies a number of strategic views that are sensitive to change and require careful management if they are to be protected and enhanced. The types of strategic view are: London Panoramas; Linear Views; River Prospects; and Townscape Views. LVMF 2A.1 Parliament Hill: the summit (looking toward St Paul’s Cathedral) is potentially sensitive to development at the application site, and as such the TVIA has tested the impact of the proposed development within this view.

316. While the development will be partly visible in View 2A.1, it was previously concluded that the Bermondsey Heights scheme due to the degree of its visibility, which is limited, and its distance from St Paul’s Cathedral in the view mean that it would not harm the view or the ability to appreciate and understand St Pauls in the view. The proposed tower would not be higher than Bermondsey Heights. It is likely that it would be seen as a relatively small part of the backdrop development in the view’s wider context and would not particularly impinge on St Paul’s Cathedral. Overall, there would be little impact on the protected LVMF views.

Borough views

317. The site is not within any Borough View corridors or their wider consultation areas.

Designated Heritage Assets

Caroline Gardens Conservation Area

318. The northern parts of the conservation area are within 60 metres of the site. Part of the wider setting of the conservation area includes views to it and its listed heritage assets across the car park of the adjacent Lidl supermarket, something that significantly detracts from the conservation area. It is considered that the proposed development would not result in any harm to the setting of the conservation area.

319.	Viewpoint 10	
	View location	North Lodge to Licensed Victuallers Benevolent Institution (Caroline Gardens) looking northeast
	Heritage Significance	High
	Sensitivity to change	Low – given the separation distance (circa 540 metres) between the development site and the listed buildings
	Impact of proposal	The proposed development would result in the addition of considerable height and scale compared to the middle distance of the view. However, in this context, it is not considered to harm the setting of the listed buildings given the aforementioned separation distance as well as the emerging context of new developments envisioned in the Draft OKR AAP.
	Historic England Comments	None
	Conclusion	It is not considered that the special architectural or historic interests of the listed building or their setting would be harmed from this development.



Image 28 (above): Verified view from Caroline Gardens towards the application site in the existing condition.



Image 29 (above): Verified view across Caroline Gardens in the proposed scenario, showing the proposed development (in full render) in the centreground, the development at 227-255 Ilderton Road (known as Leatham scheme) which is under construction (in green) and the Ilderton Wharf scheme (in blue)

Listed Heritage Assets

Gas Holder 13 (Grade II listed)

320. This is an engineering structure of significant scale and presence. The proposed development is 400 metres away from the gasholder. The proposed development would interrupt this mid-range views towards the gasholder from Bridgehouse Meadows. However, the other views towards the gasholder would remain intact. The proposed development is considered to be harmful to the setting of the listed building albeit at the lower end of the scale of less than substantial in the context of the emerging townscape envisioned in the draft OKR AAP and outweighed by the scheme's public benefits.

321.

Viewpoint 1	
View location	Bridgehouse Meadows
Heritage Significance	Gasholder no. 13 is visible in this viewpoint and is identified as a Grade II Listed structure within Southwark
Sensitivity to Change	High
Impact of proposal	From this location, the wider setting of London can be seen, with local residential developments in the foreground just beyond the trainline, then a mix of industrial developments and high-rise residential developments around the local boroughs in the background, plus uninterrupted views all the way into central London, showing the highly developed urban core of the city. It is noted that once construction at Ilderton Road has been completed, from this location the development will significantly break the skyline and interrupt the mid-range view toward the Grade II listed gasholder.
Historic England Comments	None
Conclusion	The proposed development would result in less than substantial harm on the setting of the Grade II Listed Gasholder no. 13.



Image 30 (above): Verified view across Bridgehouse Meadows towards the application site in the existing condition.



Image 31 (above): Verified view across Bridgehouse Meadows in the proposed scenario, showing the proposed development (in full render) in the centreground, the development at 227-255 Ilderton Road (known as Leatham scheme) which is under construction (in green) and the Ilderton Wharf scheme (in blue)

322.

Viewpoint 3	
View location	Junction of Commercial Way and Old Kent Road
Heritage Significance	Gasholder no. 13 is visible in this viewpoint and is identified as a Grade II Listed structure within Southwark
Sensitivity to change	High
Impact of proposal	This view looks southeast with the Gasholder visible to the left of centre with the roof of the Southwark Recycling centre visible in the distance, with the Hertz Car Rental Company visible in front centre of this view. The proposed tower block would be visible in the distance in the centre of the photo and would not impede on the views of the Grade II listed Gasholder no. 13
Historic England Comments	None
Conclusion	As the proposal is located away from the main viewpoint of the listed Gasholder no. 13, it would not harm the significance of the heritage asset.



Image 32 (above): Verified view across Old Kent Road and the gas holder towards the application site in the existing condition.



Image 33 (above): Verified view across Old Kent Road and the gas holder in the proposed scenario, showing the proposed development (in full render) in the centreground, the development at 227-255 Ilderton Road (known as Leatham scheme) which is under construction (in green) and the Ilderton Wharf scheme (in blue)

Caroline Gardens (Grade II listed)

323. Caroline Gardens are the Grade II listed, and an intrinsic part of their setting is the landscaped gardens. The buildings sit on the cusp of the high street/arterial highway character of the Old Kent Road and the surviving leafy suburbia of Peckham New Town to the south east. Views from within the gardens have since the 1870's included views of listed Gas Holder 13 and would have in the past included other gas holders and the gas works coking plant which has been since demolished. The formal symmetry of the listed building is probably best appreciated by a view on axis with the chapel. As discussed in the earlier part of this report, within this view the development appears on the periphery creating little harm to the buildings' setting.

Non-designated heritage assets

324. Whilst some locally listed buildings are located nearby to the development, given their distance from the proposed development, their significance would not be impacted by the proposed development directly or indirectly.

Conclusion on heritage and townscape impact

325. There would be some harm to the setting of the designated Grade II listed Gasholder as a result of the development due to the interruption of the mid-range views from Bridgehouse Meadows but this would be at the lower end of

the scale of less than significant harm and is clearly outweighed by the public benefits of the scheme. These benefits include provision of affordable workspace and public realm improvement along Ilderton Road and Sharratt Street. The scheme is therefore considered to be acceptable in respect of heritage matters.

Inclusive access

326. Policy D3 of the London Plan states that measures to design out crime should be integral to development proposals and be considered early in the design process. Developments should ensure good natural surveillance, clear sight lines, appropriate lighting, and logical and well-used routes. Policy P16 of the Southwark Plan reinforces this and states that development must provide clear and uniform signage that helps people wayfind and effective street lighting to illuminate the public realm.
327. The various inclusive access measures within the proposal would include:
- all uses to have step-free access through flat finished floor levels or lift arrangements;
 - lift access to be provided to all levels within the building
 - cycle storage provision to allow for larger cycles such as cargo cycles, purpose built cycles for disabled people and tricycles; and

Designing-out crime

328. Policy D11 of the London Plan and Policy P16 of the Southwark Plan require development proposals to reduce opportunities for crime and create and maintain safe internal and external environments.
329. Mentioned throughout the application documents are the various 'passive' ways in which opportunities for crime have been designed-out. Examples include:
- creating well lit routes and spaces with good sight lines, creating opportunities for natural surveillance in so doing;
 - designing-out alcoves, secluded areas and other spaces for anti-social behaviour; and
 - designing all cycle store room to be open-plan, well-surveilled and secure.
330. The Metropolitan Police's Secure by Design Officer has assessed the proposal and is confident that certification can be attained. To ensure certification is ultimately achieved, the imposition of a two-part 'Secured by Design' condition and Final Security Surveillance Equipment Strategy condition are recommended.

Community Review Panel

331. The proposals were reviewed by the Council's Community Review Panel on two occasions at both the pre-application and application stages. The first review on the mixed use development with conventional housing took place November

2022, and the revised proposals with PBSA were brought back for a second review in January 2024. The opportunity not only to review the scheme, but to see how it had evolved in response to earlier comments, was strongly welcomed by the Panel.

332. At the second review, the Panel commended that as a standalone design, the development has a number of positive elements but was concerned about the scheme's role in the neighbourhood and its contribution to the local community. The panel has reservations about whether PBSA is needed in the area and suggests that increasing conventional housing provision for local people would be preferable. The Panel's feedback was summarised as follows:

- Purpose Built Student Accommodation
 - Suggested further work to ensure that the scheme contributes positively to an inclusive neighbourhood, for example, by designing the building as a clearer destination point to attract local people, and creating greater opportunities for interaction between the local community and the student population if a need for student accommodation has been identified for these facilities in the area
 - Concerned about the affordability of the student accommodation.
- Commercial development
 - The provision and quality of the light industrial spaces is well-received, and their potential synergy with the self-storage facility.
 - The scheme has the potential to contribute positively to regenerating the Old Kent Road.
- Landscaping
 - Greening and biodiversity opportunities offered by the roof areas were welcome
 - Suggested increase residents' access to these spaces
- Height and architecture
 - Considered the 30 storeys tower too high, and that the materials and façade design may contribute to an overbearing appearance on the skyline.
 - The design of the self-storage frontage is successful
 - Supported the use of the red brick in the scheme and suggested further consideration on the overall material palette.

333. A full account of the feedback from both rounds of the Community Review Panel is provided at Appendix 6 of this committee report. Officers consider that the applicant has positively addressed feedback from the Community Review Panel and revised the scheme accordingly and satisfactory justifications have been provided where it is not feasible to make the suggested changes.

Conclusion on design

334. The design of the proposal evolved through the pre-application and planning application stages in direct response to independent design scrutiny from the

Southwark Design Review Panel and two rounds of the Old Kent Road Community Review Panel. Extensive engagement with council officers and other bodies including the GLA and HSE also informed this iterative design process.

335. The relative heights of the proposed buildings and their distribution across the site is logical and responds appropriately to the existing and emerging context, while also being broadly consistent with the tall buildings policy of the draft AAP. The proposal meets the Southwark Plan and London Plan tall building tests, and overall it is considered that the scale and massing of the proposal can be accommodated without undue harm to the established townscape. Throughout, robust and high quality finishes are proposed. To ensure high quality execution, sample materials, detailed section drawings and mock panels will be required by condition.
336. Having applied the statutory tests as set out in the Planning (Listed Buildings and Conservation Areas) Act 1990 and the requirements of the NPPF, it is considered that the proposal would conserve and enhance the significance of designated and non-designated heritage assets, with some less than substantial (but outweighed) harm caused in one instance due to the interruption of the mid-range views from Bridgehouse Meadows, and would make a positive contribution to the wider townscape character in majority of the instances. The proposed development would also make efficient use of land, optimise density and contribute towards creating beautiful and sustainable places, in accordance with NPPF paragraphs 122 to 125, London Plan Policies GG2 and D3, and Southwark Plan Policy P18.
337. Inclusive design and crime minimisation considerations have all been resolved to an acceptable level of detail.
338. For the reasons given above, it is considered that an acceptable quality of design would be achieved.

Public realm, landscaping and trees

339. London Plan Policy G7 and Southwark Plan Policy P61 recognise the importance of retaining and planting new trees wherever possible within new developments. London Plan Policy G5 requires major development proposals 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.
340. As set out in the draft Old Kent Road AAP, all new development must deliver 5 square metres of public open space per proposed dwelling (including student housing). As prescribed by the draft AAP indicative masterplans, sites are identified as providing public open space either:
- a) all on site; or
 - b) some on site, some off-site; or
 - c) all off-site.

341. In scenario b), the total quantum of on-site public open space proposed by the planning application can be deducted from the 5 square metre per dwelling financial contribution requirement. Where a site is required to make a public open space financial contribution, the £205 per square metre tariff specified in the Council's S106 and CIL SPD should be applied.

Off-site (Old Kent Road Opportunity Area) public open space

342. The proposal hereunder consideration would deliver the equivalent of 237 dwellings, producing a requirement for 1,184 square metres of public open space.

343. This yield cannot be delivered as part of the proposed development due to the constrained nature of the plot. Applying the £205 multiplier, this generates an in-lieu contribution of **£242,720** (index linked) which would be secured through an obligation in the Section 106 Agreement.

Landscaping

344. On the ground floor level, the two street frontages will form an attractive public realm which will encourage people to walk and cycle. The landscape design of the site will consist of a clear hierarchy of green infrastructure and a robust palette of hard materials. Although the planting schedules are indicative at this stage, they nevertheless comprise a good mix of drought tolerant and sun-loving species, as well as an appropriate ratio of evergreen to deciduous.



Image 34 (above): Roof plan showing the landscaping arrangement

345. For the roof terrace, following the feedback from the Community Review Panel, the applicant has revised the depth, sizes and layout of planters to create more open space. It will feature garden rooms created with planters and seating to create social spaces. 3no. multi-stem trees added to the inaccessible planter -

for better outlook onto green space and low level planting to the perimeter (depth 1.0m) to increase pockets of accessible space.



Image 35: Visualisation of the roof terrace

Trees

346. A Tree Survey and Arboricultural Impact Assessment accompany the planning application. The Tree Survey identifies no arboricultural features within the application site and 4 features on land adjacent to the site. These 4 features comprise 4 individuals and 1 group, to which the Tree Survey attributes Category C
347. The Council's Urban Forester has appraised the Arboricultural Impact Assessment and Method Statement, and has deemed them acceptable.
348. This planning application proposes to plant a total of 14 new trees along Ilderton Road. The indicative details suggest that a variety of native species and tree sizes would be included. A mix of fast and slower growing species with a range of carbon storage potential is proposed. The detailed drawings show tree canopy extents at maturity (25 years) and any conflicts with built structures. The Council's Urban Forester has assessed these proposals and raised no objection.
349. Sufficient soil volumes, long-term management and watering schedules are paramount to establishing trees within the urban environment. The applicant is currently working through the technical and construction design. Final details are to be secured through planning conditions and obligations.
350. Overall the proposal presents a significant uplift in tree cover for the site, which should be treated as a major benefit of the planning application.

Conclusion on public realm, landscaping and trees

351. The scheme would significantly enhance the streetscape on Ilderton Road and Sharratt Street with widen footway, new tree planting and hard and soft landscaping and active frontage. A robust palette of hard finishes would be paired with a diverse specification of planting, completed by a scheme of lighting appropriate to the context and mindful of public safety and biodiversity. A total of 68 new trees would be planted, with all 18 existing trees and groups to be

retained, making a major contribution to the Opportunity Area's green infrastructure.

352. Having reviewed the landscaping proposals, the Council's Urban Forester considers the indicative materials and specifications to be of a high quality, with appropriately-selected trees and other soft planting. Many of the spaces would be suitably framed by active frontages and/or accommodate incidental play facilities. This will make for a rich, vibrant and attractive publicly-accessible realm.
353. Through the Section 106 Agreement, a contribution of £181,435.00 will be secured, to be put towards the delivery of off-site (Old Kent Road Opportunity Area) public open space. The Section 106 Agreement will also include a payment-in-lieu mechanism in the (albeit unlikely) event of the developer failing to deliver any of the 68 trees proposed.

Green infrastructure, ecology and biodiversity

354. Policy G5 of the London Plan states that urban greening should be a fundamental element of site and building design. It requires major developments that are predominantly commercial to achieve an Urban Greening Factor (UGF) score of 0.3 and those that are predominantly residential to achieve a score of 0.4. The scheme proposed by 23/AP/1317 falls within the latter category.
355. In England, Biodiversity Net Gain is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). This statutory framework is referred to as 'biodiversity net gain' in Planning Practice Guidance to distinguish it from other or more general biodiversity gains
356. There are statutory exemptions and transitional arrangements which mean that the mandatory Biodiversity Gain condition does not always apply. This application has been assessed as being exempt as the development is not 'major development' (within the meaning of article 2(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015) where the application for planning permission was made before 2 April 2024.
357. Notwithstanding that this planning application would not be subject to the mandatory requirements because it pre-dates January 2024, the protection and enhancement of opportunities for biodiversity is a material planning consideration.
358. London Plan Policy G6 requires development proposals to manage impacts on biodiversity and secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process. Southwark Plan Policy P60 seeks to enhance populations of protected species and increase biodiversity net gains by requiring developments to include features such as green and brown roofs,

green walls, soft landscaping and nest boxes. Southwark Plan Policy 59 requires major development to provide green infrastructure with arrangements in place for long-term stewardship and maintenance funding.

Urban greening

359. The proposal would achieve a UGF score of 0.4 through a combination of these principal elements:
- 214 square metres of intensive green roof with substrate of minimum settled depth of 150mm
 - 89.6 square metres of 'larger' tree coverage (trees planted in connected pits with soil volumes to at least two thirds of the projected tree canopy);
 - 1432 square metres of extensive green roof;
 - 176 square metres of green wall (modular system); and
 - 310 square metres of permeable paving
 -
360. The score of 0.4 would meet the minimum policy requirement, and as such should be treated as a benefit of the scheme. A two-part condition will be imposed to ensure the development is built-out to achieve the 0.4 UGF.

Ecology

361. An Ecological Appraisal accompanies the planning application. It notes the following:
- No roosting bats or signs of roosting bats were observed. No bats were observed to emerge from the building during the survey;
 - Low activity from common pipistrelle *Pipistrellus pipistrellus* was heard off site on the adjacent trainline habitat to the east. Measures to avoid disrupting foraging and commuting bats are therefore provided;
 - habitat suitable for breeding birds is present – Precautionary measures would be taken to avoid killing birds or destroying their nests;
 - a range of measures should be undertaken to satisfy the requirement for ecological enhancement included in planning policy.
362. Upon request from the Ecology Officer and the GLA's comments, the Applicant has also revised the Ecological and Biodiversity Assessment to consider the impacts of light spill, shading and noise during construction and operation on the adjoining SINC along the rail embankments.
363. The site contains Jersey cudweed (*Gnaphalium luteoalbum*), a schedule 8 protected plant species. A condition is recommended to seek submission of a copy of the EPS Licence to ensure the applicant has obtained a licence from Natural England detailing the mitigation strategy required for works which may kill/uproot the plant.
364. A green wall is proposed along the eastern boundary of the site adjoining the railway embankment SINC. Upon the request from the Council's

Ecology Officer, the applicant has explored enlarging the buffer with wider planting beds at ground level. However, this is not considered feasible as 1.2m wide clear width path is needed for fire emergency access and maintenance of the vertical planting structure.

365. The revised Ecological Appraisal concluded that provided the measures set out in the Appraisal are adhered to, all identified impacts to ecological receptors will have been addressed, with no residual impacts subject to a condition for Construction Environmental Impact Assessment and the external lighting details.
366. Upon the request from the Council's Ecology Officer, the applicant has also provided an updated Bat Survey which concludes that no evidence of roosting bats was recorded within any of the buildings on Site. Provided sensitive artificial lighting is employed during the construction and operational phase of development, the proposed development is considered unlikely to impact foraging or commuting bats using the site.
367. With a condition requiring the proposed development to be constructed in accordance with the Ecological Appraisal, the ecological impacts of the development would be mitigated, in compliance with Policies P59 and P60 of the Southwark Plan.

Biodiversity

368. The applicant's Biodiversity Net Gain Assessment found the site to have a baseline score of 0.12 habitat units. This relatively low score is attributable to the site coverage mainly comprising buildings, areas of hardstanding and bare ground, with only some introduced shrub. As a consequence of the proposed development, the biodiversity score of the site would increase by 0.41 habitat units to a new score of 0.53, representing a gain of 350.07% on the baseline.
369. Given the delivery of on-site biodiversity net gain is one of the planning benefits of the proposed development, a planning condition is recommended requiring the submission of Landscape and Ecological Management Plan. The purpose of the plan is to ensure the new habitats delivered as part of the development are managed and sustained appropriately for 30 years.

Conclusion on urban greening, ecology and biodiversity

370. The provision of urban greening is welcomed, with conditions to secure the provision of features within the building fabric to support local biodiversity (10 Swift nesting bricks, 5 bat bricks/tubes and 2 bee bricks and/or invertebrate hotels), along with biodiversity audits for a 30-year period. A two-part condition will be imposed to ensure the development is built-out to achieve the 0.4 UGF score.

Archaeology

371. The site is located within the 'North Southwark and Roman Roads' Archaeological Priority Area and is of geo-archaeological significance. The planning application is supported by a desk-based assessment that provides a clear baseline of data concerning the level of archaeological work undertaken at surrounding sites. The previous archaeological evaluation work on site has demonstrated that no archaeological response is necessary for this application.

Transport and highways

Healthy Streets

372. London Plan Policy T2 requires development proposals to demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with TfL guidance. These indicators are intended to inform design, management and use of public spaces in order to place people and people's health at the forefront of development decisions.

Enhancements to the pedestrian and cycle environment on-site

373. Given the set-back of the proposed buildings, the footways on both Ilderton Road and Sharratt Street will be widened together with 14 new street trees and 22 visitor cycle parking spaces on the street. Part of the widened footways will be adopted by the Council. These Healthy Streets improvements would be secured through a Section 38/278 Agreement.
374. It is noted that the width of the proposed crossovers is greater than 3.0 metres. The Transport Policy Offer and Highways Officer have confirmed that these are acceptable in this instance as the width have been minimised and is necessary to ensure on-site delivery. The existing crossovers and accesses that will be taken out of use due to the development proposals as they stand would also be removed and full kerb-height footway will be restored as part of a s278 agreement at applicant cost.

Enhancements to the existing highways network adjacent to the site

375. A contribution of £100,000 is to be secured in the Section 106 Agreement to improve both the northbound and short bound bus stops on Ilderton Road.
376. Furthermore, the applicant is committed to provide a new raised zebra crossing on Ilderton Road to provide a safer crossing between the two bus stops and an e-scooter and e-bike on-street bay on Sharratt Street in order to mitigate the increase in trips generated by the development and promote the use of public transport. This would be delivered as part of the S278 works.

377. These enhancements to the existing highways network adjacent to the site are strongly supported. They will make for a safer and more accessible public realm, and one that is more attractive to those considering travelling on foot or by bike.

Active Travel Audits

378. The 'Active travel' agenda, which is promoted at all levels of policy, seeks to make walking, wheeling and cycling the preferred choice for everyone. Upon the request from TfL, the applicant carried out two Active Travel Audits (ATAs), one for the day-time and one for the night-time. The purpose of the ATAs is to identify deficiencies in the existing local transport and public realm network, and make recommendations as to how these could be improved.

379. Turning firstly to the day-time ATA, this identified the opportunities for the following interventions to reduce barriers to active travel:

- provision of pedestrian seating near Currey Canal Road Gardens, New Cross Station and New Cross Gate Station;
- provision of signage to encourage routing via quieter or alternative routes;
- resurfacing the dropped kerb tactile paving crossings;

380. With regard to the night-time ATA, this identified a number of ways the local environment could be improved to make active travel more appealing, safe and convenient. Examples include:

- encouraging active frontages and signage along residential streets;
- cleaning up the graffiti underneath the rail track on Surrey Canal Road to foster an increased sense of safety for those walking;

381. It is considered that other future major planning application proposals nearer to the locations in question could credibly deliver this remediation as part of their Healthy Streets contribution. In a similar way, all of the issues identified by the night-time ATA are a good distance away from the site, and could realistically be funded by other forthcoming developments closer to the locations in question, or through publicly-funded works.

382. As mentioned in earlier parts of this report, the planning application will bring forward significant improvements to the local pedestrian environment and the 'sense of place' more generally. As such, these works alone represent an adequate contribution towards the Healthy Streets agenda. They will make for a safer, more comfortable and more convenient environment for pedestrians and cyclists. Therefore, in this particular instance, it is not considered necessary or proportionate to require the applicant to make contributions towards any of the off-site active travel enhancements identified in the two ATAs.

Conclusion on Healthy Streets

383. Some ways in which the proposal would support the ten Healthy Streets indicators are:

- it would make major enhancements to the public realm around the site including wider footway with 14 street trees and 22 cycle parking on Ilderton Road and Sharratt Street (providing a safe and pleasant active travel experience)
- it would be car-free save for wheelchair parking spaces, thus promoting walking, cycling and use of public transport;
- it has been designed to minimise air and noise pollution; and
- It would provide investment in sustainable transport facilities and services to commensurately mitigate the impact on existing infrastructure including the following:
 - £534,600 (index linked from 2019) for public transport improvement including bus services
 - £100,000 (index linked) for the improvement over the nearby bus stops

384. The Section 106 Agreement will include clauses requiring the applicant to enter into the Section 278 works including the following:

- New zebra crossing on Ilderton Road with raised table at the junction of Ilderton Road and Sharratt Street
- Provide an e-scooter and e-bike on-street bay on Sharratt Street to promote sustainable travel.
- Provide 12 visitor cycle stands on Sharratt Street and 10 visitor cycle stands on Ilderton Road
- Provide 14 trees along Sharratt Street and associated maintenance costs
- Repave the footways
- Improve pedestrian crossings in the vicinity of the development, including any raised crossings and raised junctions if required. The applicant should design them in accordance with the SSDM requirements.
- Promote all necessary Traffic Regulation Orders (TMOs) to amend any parking controls and any amendments to existing waiting and loading restrictions.
- Refresh road markings following kerb installation.

385. With all of the Healthy Streets benefits secured through the appropriate mechanisms (planning conditions, Section 106 obligations and a package of sequenced Section 278 agreements), the proposal meets the requirements of London Plan Policy T2.

Trip generation

386. Policy T4 of the London Plan requires development proposals to ensure the impacts on the capacity of the transport network are fully assessed and that

any adverse impacts are mitigated. Policies P45, P49 and P50 of the Southwark Plan require developments to minimise the demand for private car journeys and demonstrate the public transport network has sufficient capacity to support any increase in the number of journeys by the users of the development.

387. As a borough, Southwark agrees with TfL that bus services will need to be increased in the Old Kent Road area ahead of the delivery of the BLE, in order to accommodate the demand generated by additional homes (as part of Phase 1 of the Delivery Plan) and additional jobs. As part of this agreement, TfL is required to report back to the Council with evidence that these pooled contributions are being spent appropriately; this reporting will serve as evidence that any further financial draw from future development is justified. As part of the agreement, TfL can require contributions from developments based on a tariff of £2,700 per proposed home (or equivalent for PBSA bedspaces), index-linked to March 2019.
388. The submitted Transport Assessment estimates the total person two ways trips generated by each proposed uses during the AM and PM peak as follows:

<u>Trips generation</u>				
	PBSA including ancillary café and cycle hub	Self-storage	Fab-Lab	Total
AM (0800-0900)	72	23	25	123
PM (1700-1800)	72	24	28	126

389. Given the lack of on-site general needs for car parking along with the various public transport options in the area, nearby cycle links and on-site cycle parking provision, the trips associated with the proposed student accommodation would predominantly be by sustainable travel modes including on public transport, by bicycle and on foot with only 1 disabled parking space for the PBSA, 10 parking spaces would be provided for both the self-storage and Fab-Lab including 2 disabled parking and 2 vans spaces. Hence, it is estimated that the proposed development would generate 12 two-way vehicle trips in the AM peak and 9 two-way vehicle trips in the PM peak.
390. It is important to note that, compared to the existing site with its large areas of surface parking, the proposed development would result in a marginal reduction in private car trips, with 5 fewer two-way trips in the AM peak and 1 fewer two-way trips in the PM peak.
391. As there would be a public transport capacity impact from planning application 23/AP/1317, a contribution of **£534,600** (index linked from 2019) towards public transport improvement including local bus service

investment is to be secured for use by Transport for London. The applicant has agreed to this contribution.

392. It is considered the trip numbers generated by this planning application would not have any noticeable adverse impact on the local highway network when accounting for the bus service investment contribution, together with the other mitigation secured such as the initiatives in the Travel Plan. These initiatives include the appointment of a dedicated Travel Plan Coordinator, the provision of cycling facilities, furnishing users of the development with travel information, and offering cycle training courses.
393. A Final Travel Plan and Transport Methods Survey is to be secured by condition to ensure the measures outlined in the draft document are implemented and promoted.

Servicing and deliveries

394. London Plan Policy T7 deals with servicing and delivery arrangements during construction and end use. With respect to end use, the policy requires provision of adequate space for servicing, storage and deliveries to be made off-street, with on-street loading bays only used where this is not possible.

Servicing/delivery trip generation

395. The applicant's Transport Assessment, which uses TRICS data, predicts on a daily basis approximately 22 deliveries to the development, with the vast majority being in connection with the PBSA. Any vehicular servicing activity associated with the self-storage element of the development is considered to be included within the trip generation previously detailed as it is based on a site wide survey of a similar development. The split would be as follows
- PBSA: 17 deliveries
 - Fab-Lab : 5 deliveries
396. In respect of the PBSA premises (including the café), the Transport Assessment predicts that no more than 1 delivery would be during the peak hour (assumed as 08:00-09:00). It finds that these vehicles could be comfortably accommodated in succession by the servicing/maintenance bay located in the southern service yard. 1 delivery trip is predicted to occur during the peak hour (assumed as 17:00-18:00).
397. In respect to servicing and delivery vehicles attending the Fab Lab and self-storage, these would use the northern undercroft car park with a floor to ceiling height of 5.3m where two LGV loading bays would be provided which would adequately accommodate the servicing needs.
398. The following initiatives are proposed in the Outline Servicing and Delivery Plan:

- on-site management team will manage servicing activity in relation to the PBSA, seeking where possible to minimise deliveries during peak hours;
- all residents will be provided with a Home User Guide containing details on how to book deliveries;
- suppliers will be encouraged to use consolidation wherever possible; and
- the PBSA management team will ensure that deliveries remain in the vicinity of the site for as little time as required and that vehicle engines are switched off while stationary (where possible).

399. As noted above, the site is located within Phase 2, as per the requested from TfL, a Revised Delivery and Servicing Plan (DSP) will be submitted to the Council for further approval taking into account the delivery and servicing demand based on the latest data. Any additional measures will be adopted through the Revised Delivery and Servicing Plan and the associated monitoring mechanisms over the course of the first two years of operation, including a Delivery and Servicing Bond.

Servicing/delivery routing

400. The tracking analysis has been provided to demonstrate that the loading areas for both the PBSA and the commercial uses would accommodate LGVs to turn around within the development site enabling them to egress back on to Ilderton Road and Sharratt Street in forward gear.



Image 36 (above): Routing strategy for servicing the proposed development with the servicing facilities highlighted in red and the routes in blue

401. Upon the request from Transport Policy Officer, the applicant has reconfigured the layout and demonstrated satisfactorily that two vans can ingress and egress the southern service yard in forward gear whilst there are a vehicle parked within the disabled parking bay and another LGV parked within this area for servicing activities which can take a whole day or longer.

Servicing/delivery hours

402. Servicing hours to all of the proposed uses would be restricted by condition, as follows:

- 07:00 to 20:00 Monday to Saturday; and
- 10:00 to 18:00 on Sundays and Bank Holidays.

Conclusion on servicing/deliveries

403. The Transport Policy Officer confirmed that the proposed delivery and servicing arrangements are considered acceptable, and would have no negative impact on the local highways network or pedestrian safety subject to a Final Delivery and Servicing Plan based on the principles established by the Outline Delivery and Servicing Plan submitted with the application.

PBSA move-ins and move-outs

404. Students moving in and out of PBSA can generate a significant demand for loading space nearby. To ensure these impacts are minimised, the procedure for managing student arrival and departure periods at the start and end of term will be set out within the Final Student Management Plan to be secured by obligation, and this will be expected to align with the principles in the application-stage documents. The key elements proposed at this stage are:

- the southern servicing and maintenance area provided on-site will be for use by drop-off/pick-up activity;
- through an electronic booking system, students will be given a dedicated time slot (times would be distributed to avoid peak periods) in which they are able to make use of the service and maintenance bay to move their items;
- the move-in/out process may (if necessary, depending on numbers of move-ins) be spread across multiple days as necessary to ensure each student who requires it is provided with a time slot.

405. Specifically with regard to move-ins, but not move-outs, these further measures are proposed:

- an increased management presence will be provided to manage activity;
- in advance of their move-in date, students will be sent a supporting information pack relating to the vehicle move-in strategy, as well as information on public transport routes available to non-car arrivals.

406. In respect of move-out arrangements, student term end dates are variable depending on their respective courses, and as such, the process is less intensive – hence why only three of the five commitments above would apply to move-outs.

407. These measures are considered acceptable. With the final version of the Student Management Plan secured prior to occupation, no harm would be caused to the local highway network or surrounding residential amenity.

Refuse storage arrangements

408. With regard to the PBSA, waste would be collected by a private contractor, from bin stores sufficiently close to the servicing area of the PBSA building and the undercroft car park within the commercial building. Tracking has been provided to demonstrate sufficient turning space for refuse vehicles. Plans submitted with the application demonstrate that the refuse store has been sized to accommodate the refuse receptacles necessary to meet the volumes of waste generated by the PBSA, with sufficient manoeuvring and circulation space factored-in.
409. Through an obligation in the S106 Agreement, the developer is obliged to ensure that a contract is in place with a commercial provider of refuse/recycling collection services for both the PBSA and commercial uses for the lifetime of the development. The operators will be expected to keep refuse within the demise of the property and collect the refuse within the southern service yard and the undercroft car park.
410. The Final DSP, to be required by condition, will secure the finalised refuse details including the collection arrangements.

Car parking

411. Policy T6 of the London Plan requires developments in locations with existing and future high public transport accessibility to be car-free, save for adequate parking for disabled people. Specific requirements for different uses are set out in Policy T6.1 through to Policy T6.4, while Policy T6.5 deals with non-residential disabled persons parking.
412. Southwark Plan Policy P54 echoes the London Plan, promoting car-free development in zones with good public transport accessibility. It requires car-free non-residential proposals in CAZ locations, and for any disabled parking to be provided on-site and supported by EVCPs.

Wheelchair car parking provision

PBSA

413. Applying the London Plan standards, a total of 6 wheelchair accessible parking spaces (i.e. 3% of one third of 592 student beds) should be provided on-site from first occupation of the proposed development.
414. The Southwark Plan requires a maximum of one car parking space per wheelchair accessible unit, which for this application would equate to a maximum of 10 (applying a 1:3 ratio to the PBSA wheelchair units). The

policy makes clear that lower levels of parking can be provided, depending on:

- the anticipated demand for parking spaces,
- the tenure of the development;
- the quality and accessibility of the local public transport network; and
- the access to local amenities.

415. 1 space will be provided for the PBSA as students with mobility impairments will be prioritised by their educational institution to accommodation closest to their teaching campus. Given the site's location close to numerous and regular bus routes and Queen's Road Station, as well as its predicted future PTAL rating, residents would benefit from a range of public transport options. On balance, the number of car parking spaces provided is acceptable.

416. *Self storage and Fab Labs*

A total of two disabled parking will be provided including 1 space beside the entrance gate to the undercroft car park and another one within the secured undercroft car park. The provision would be accessible and sufficient, complying with the policies.

417. Electric Vehicle Charging Points (EVCPs) are required to meet the London Plan standards, which as of 2023 are 20% active and 80% passive provision, considering all parking spaces, and should be maintained in perpetuity.

418. This means that the isolated disabled parking bay for the PBSA must have an active EVCP upon occupation; whilst the operational parking for the commercial component of the scheme must also have at least 20% active charging points upon occupation of the self storage and light industrial units. Active charging points are to be prioritised to disabled parking spaces. The details of the EVCP provision will be secured through condition. The blue badge car parking provision will be retained perpetually which would be secured by a Section 106 Agreement.

Reducing car usage

419. During the application stage, officers have asked the applicant to explore the provision of the Car Club Bay within the application site. The applicant has approached Zipcar who confirmed that student schemes did not lend themselves to car club provision as their terms restrict users to people of 23 years and older making it unviable. To reduce car usage, the applicant has agreed to offer free Car Club membership to first commercial operators of the commercial units within the development to a nearby (within 800meters) Car Club vehicle provider (minimum duration of the membership is to be 1 year) within three months of the first occupation of each commercial units. This will be delivered through an obligation in the S106 Agreement.

420. The site is not yet within a Control Parking Zone (CPZ) but will be inside Southwark’s Old Kent Road CPZ Extension.

421. Through an obligation in the Section 106 Agreement, all residents of the proposed development would be exempted from applying for parking permits.

Cycle parking

422. London Plan Policy T5 sets minimum cycle parking standards for different uses. Southwark Plan Policy P53 sets out requirements that are generally higher than the London Plan standards.

423. The table below summarises the minimum cycle parking required by the Southwark Plan and London Plan, alongside the provision proposed by this application based on the submitted drawings. Wherever flexible uses are proposed, the use with the highest storage requirement yield has been adopted for the purposes of these calculations:

Cycle parking minimum policy requirements vs provision: Summary table						
<u>Land use</u>	<u>Long-stay spaces</u>			<u>Short-stay spaces</u>		
	Requirement		Provis ion	Requirement		Prov ision
	SP '22	LP '21		SP '22	LP '21	
PBSA including ancillary café and cycle workshop	592	444	593	59	15	68
Self storage (Use class B(8))	14	14	12	14	7	14
Fab-Labs (Class E(g)(iii))	4	2		4	1	
Total	610	460	605	77	23	82

PPSA long-stay cycle parking

424. As the table above shows, the proposal for the PBSA would exceed the minimum Southwark Plan requirement by 1 space which is supported.

425. With regard specifically to the PBSA, in total 593 secure long stay cycle parking spaces would be provided – these would be located above ground floor level, but accessible by lift in this mix of formats:

- 222 two-tier Josta Stands [444 spaces] (75% of the total);
- 60 standard Sheffield Stands [119 spaces] (20% of the total); and

- 30 Sheffield Stands for use by accessible/larger cycles [30 spaces] (5% of the total).
426. During the application stage, detailed layouts have been provided of all the cycle stores as per officers' requests, showing general compliance with the London Cycle Design Standards, including adequate aisle widths and stand spacings, adequate clear headroom, sufficient space for 2 cyclists to use the lift at any one time, and sufficient space for 2 cyclists to pass in corridors. For these reasons, the quality of long-stay cycle storage is considered acceptable.
427. In an effort to further promote the cycling, a Cycle Workshop will be provided within the PBSA block with a direct entrance off Ilderton Road. The applicant is committed to find an operator to provide bike repair services. The proposed Cycle Workshop is beyond the minimum policy requirement and considered as additional public benefit. The Section 106 Agreement will ensure marketing strategy of the Cycle Workshop to be submitted and the Cycle Workshop will be delivered no later than 75% occupation of student accommodation within the host building. It will also ensure the Cycle Workshop will be accessible to the public.

Commercial long-stay cycle parking

428. With regard specifically to the commercial uses, a total of 12 secure long stay cycle parking spaces would be provided, all in Sheffield Stand format.
429. It is noted that as shown from the table above, the proposal for the non-residential uses would fall short of the Southwark Plan and London Plan requirements by 4 spaces and 2 spaces respectively. However, the calculation of the requirement for the proposed self-storage is based on the typical Storage and Distribution (class B(8) uses). However, the applicant estimates that the self-storage would employ 3-4 staff only, which would reduce the needs of long-stay cycle parking. It is therefore considered that the long stay cycle provision for the non-residential uses would be acceptable on balance.
430. As the Fab Lab units proposed by this application would take the form of a number of small-scale units and the proposed self storage will employ limited staff, the non-provision of dedicated showers for employees is acceptable in this instance.

Short-stay cycle parking

431. With regard to the proposed short-stay (visitor) provision, 82 spaces will be provided in this mix of formats:
- 20 two-tier Josta Stands [40 spaces] within the building;
 - 6 standard Sheffield Stands [10 spaces] within the building;
 - 1 cargo bike Sheffield Stands [2 spaces] within the undercroft car park
 - 5 Sheffield Stands [10 spaces] on Ilderton Road
 - 6 Sheffield Stands [12 spaces] on Sharratt Street

432. The on-street stands would be distributed across the public realm with adjacent to the various main entrances of the buildings. These are appropriate locations, as they would ensure the effective footway widths along the site's main frontages are kept clear of cycle storage.
433. The applicant has committed to provide a cargo bike loan scheme to the users of the commercial building in order to promote sustainable freight which is supported. This will be secured through a S106 Agreement.
434. The short-stay provision would fall slightly short of the Southwark Plan requirement (shortfall being 5 spaces) and significantly exceed the minimum London Plan requirement (the surplus being 49 spaces).
435. Given that opportunities have been maximised around the base of the building and within the red line boundary of the site to accommodate visitor cycle parking and the compliance with the London Plan requirements and having regard to the applicant's offer to contribute towards investment locally in TfL (Santander) docking stations, in this particular instance the shortfall in short-stay bicycle parking provision is considered permissible.

Improving access to cycle hire options

436. Given that the development would introduce up to 25 additional FTE employees to the site and 592 students upon full occupation, the applicant has agreed to contribute **£18,789** (index linked) towards expansion of one or more TfL (Santander) cycle docking stations in the vicinity of the site. To be secured in the Section 106 Agreement, this contribution would meet the requirements of Policy T5 of the London Plan and Policy P53 of the Southwark Plan.

Legible London signage

437. The applicant has agreed, at the request of TfL, to make a contribution of **£30,000** (index linked) towards providing new and refreshed Legible London signage. This will be secured in the Section 106 Agreement.

Level changes across the ground plane

438. The proposed development would improve the public realm along the frontage of the site on Ilderton Road and Sharratt Street, including widening the footways, and providing street trees. As part of these public realm enhancement works, there is likely to be a degree of regrading of some of the existing footway to achieve the requisite cross-fall. This is standard practice and will be agreed through the Section 278 process, which occurs subsequent to planning permission being granted. The planning application proposes no changes to the existing road carriageway or kerb levels. The Transport Policy and Highways officers have reviewed the Ground Plane Spot Levels Plan and confirmed no objection.

Transport and highways summary

439. Having considered all transport and traffic related implications, the scheme would minimise vehicle movements by prioritising use of public transport, walking and cycling, and by encouraging consolidation of deliveries.

Environmental matters

Construction management

440. The applicant has submitted an Outline Environmental Construction Management Plan explaining how construction activities will be managed to minimise neighbour amenity, environmental and highway network impacts. This document has been reviewed by the relevant transport and environment consultees, who have deemed it to be a satisfactory framework document.
441. In order to ensure that increases in traffic, noise and dust associated with the demolition and construction phases of the development are minimised, a Final Construction Environmental Management Plan and a Construction Logistics Plan are to be required by condition. The applicant has also agreed to pay a sum of **£7,920** to the Council's Highways Network Management to fund their work in monitoring adherence to the CEMP through the demolition and construction phases.

Flood risk, resilience and safety

442. The site is in Flood Zone 3 and is located within an area benefitting from flood defences. The site was assessed as part of the Council's Strategic Flood Risk Assessment (2017) and sequential test. No further sequential test is required. The applicant's Flood Risk Assessment sets out that the site is at low risk of groundwater flooding and only a small portion of it is at risk of surface water flooding. The Environment Agency has reviewed the applicant's Flood Risk Assessment and considers it to be acceptable.
443. In terms of flood resilience and safety, the Council's Flood Risk Management Team has assessed the applicant's revised Flood Risk Assessment and is satisfied that:
- the site will not flood as a result of the 1 in 30 year rainfall event;
 - there will be no flooding of buildings as a result of events up to and including the 1 in 100 year rainfall event; and
 - finished floor levels can be designed to produce a nominal threshold above surrounding ground levels, with the external levels designed so any surface flows shed away from buildings and towards positively drained areas.
444. Compliance with the Flood Risk Assessment will be secured by way of a condition, and a pre-occupation condition will be imposed requiring submission of a Flood Warning and Evacuation Plan.

Sustainable urban drainage

445. The applicant's Drainage Strategy proposes that surface water flows would be attenuated through the use of a blue/green roof system, and permeable paving complemented by below-ground geo-cellular storage crates. The discharge rates are proposed to be restricted to a rate equivalent to greenfield runoff. This has been deemed satisfactory by the Council's Flood Risk Management Team. Two conditions are recommended, one requiring details of the final surface water drainage system to be submitted prior to commencement of the development, and the other requiring submission of a verification report prior to occupation.
446. As a precautionary measure, the Section 106 Agreement will include an offset obligation in the event that the finalised drainage system fails to achieve greenfield rates of run-off cannot (to be confirmed by the verification report referred to above). The contribution will be calculated at a rate of £366 (index linked) per cubic meter.

Land contamination

447. The application was accompanied by a preliminary Land Contamination Risk Assessment, which the Council's Environmental Protection Team has assessed and deemed acceptable. A condition is to be imposed requiring further remediation measures to apply if contamination is found to be present.

Utilities

448. The submitted Utilities Strategy sets out the existing utilities on site (electricity, potable water, waste water and gas), and assesses the potential impacts of the proposed development on the wider networks, including the potential provision of additional services that may be required to deliver the proposals.
449. The applicant has made a submission to UKPN with an estimated total site load of 1.53MVA kVA and 225 kVA to carry out a developmental impact assessment for the proposed PBSA and commercial uses respectively. It is proposed to erect a new 1.6 MVA substation within the ground floor of the PBSA block. The exact location of the connections required are to be confirmed by UKPN and relevant parties in due course. UKPN has not responded to a consultation request from the Southwark Council about the planning application, and as such no objections are assumed with regards to the impact the proposal will have on the power supply network.
450. The proposed development is located within 15 metres of a strategic sewer and a strategic water main. A condition is recommended to secure a piling method statement as per Thames Water's request.
451. Thames Water have identified that some capacity exists within the water network to serve 100 dwellings and upgrades to the water network will be required beyond that. Works are ongoing to understand this in more detail and as such Thames Water recommended a planning condition to be attached to

any approval to ensure development does not outpace the delivery of essential infrastructure and acceptable pressure levels in the potable water supply and the local foul water infrastructure could be delivered. A condition is therefore recommended. Impacts on the local surface water infrastructure are dealt with in a separate part of this report entitled 'Sustainable urban drainage'.

452. There would be no impacts on the National Gas Transmission network as no gas will be used. A plant room for District Heat Network connection will be provided on the ground floor of the PBSA block. A S106 obligation will also require the commercial development to future proof any connection to District Heat Network (see also Energy and sustainability section).
453. For these reasons, it considered that the application meets the requirements of Southwark Plan Policies P64, P67 and P68.

Wind microclimate

454. London Plan Policy D9 requires all tall building proposals not to cause changes to the wind environment that would compromise comfort and the enjoyment of open spaces around the building and in the neighbourhood. Southwark Plan Policies P14 and P56 require wind effects to be taken into consideration when determining planning applications, as does Policy P17 where the proposal is a tall building.
455. The applicant's Wind Microclimate Report submitted in support of the application considers the following scenarios by using Computational Fluid Dynamic (CFD) modelling:
- Scenario 1 – proposed development in the 'Existing Surrounds, with Mitigation'
 - Scenario 2 – proposed development in the 'Future Surrounds, with Mitigation'
456. Wind conditions have been categorised using the Lawson Comfort Criteria and the predicated wind conditions compared against the intended uses.
457. The Wind Microclimate Report finds that, following the introduction of the proposed development with mitigation, wind conditions are predicted to meet the safety criteria within the site and nearby surrounding area, and are predicted to be suitable for existing and planned pedestrian uses. This applies on the entrances of all the surrounding buildings and the proposed development, main pedestrian routes and all existing amenity and parking spaces within a 250m radius of the site, as well as on the high-level communal outdoor spaces of the PBSA block. When the cumulative developments (plus the on-site mitigation) are factored-in, the conclusion remains that wind conditions would meet the safety criteria and be comfortable for the likely pedestrian uses taking place.

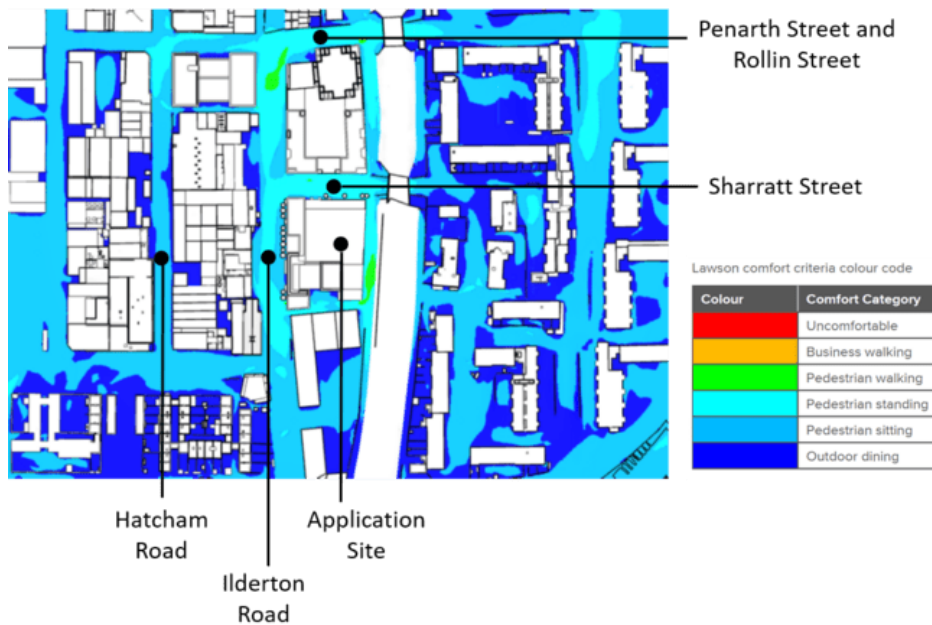


Image 37: Wind conditions at ground plane, in the proposed development, with mitigation, within existing surrounds



Image 38: Pedestrian wind conditions at ground plane in the proposed development, with mitigation, within cumulative surrounds

458. All necessary wind and microclimate mitigation measures including canopies to entrances to mitigate the wind downwash and solid parapet wall around the roof terrace (the details to be secured through conditions) have been incorporated to bring the wind conditions surrounding the proposed development to levels that are comfortable for the anticipated types of pedestrian activity. Therefore, it is considered that London Plan Policy D9 and Southwark Plan Policies P14, P17 and P56 have been met.

Air quality

459. An Air Quality Assessment was 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.
460. In terms of the construction phase, fugitive dust was assessed as having a maximum dust risk of “high”; however, with the mitigation measures proposed, residual effects on receptors are likely to be negligible. These proposed measures, which are set out in the Outline Construction Environmental Management Plan, include locating machinery and dust causing activities away from sensitive receptors, using enclosed chutes and conveyors and covered skips, covering soil or debris mounds to prevent dust becoming airborne. The assessment of impacts from air pollution attributable to heavy goods vehicles during construction was also assessed quantitatively as “insignificant”. Mitigation in this regard includes ensuring all on-road vehicles comply with the London Low Emission Zone requirements. Both the fugitive dust and heavy good pollution would be temporary effects. Furthermore, following GLA stage I comments, the Applicant has included mitigation measures relating to monitoring within the construction dust risk assessment.
461. The proposed building itself would be all-electric (meaning there would be no on-site combustion), which mitigates air quality issues and facilitates significant advances towards zero carbon in future decades as the National Grid continues to decarbonise
462. Upon the request from GLA officers, the applicant has clarified that the net change of trips being generated from the proposed development is 75 AADT given the existing warehouse on site could have generated 56 Annual average daily traffic (AADT) and the proposed development is to generate 126 AADT. Therefore, the proposed development falls below the 100 AADT threshold outlined within the EPUK & IAQM 2017 guidance.
463. The Council's Environmental Protection officer has reviewed the Air Quality Assessment and confirms that subject to the proposed mitigation measures, the effects on air quality during construction and operation are considered to be negligible.

Agent of change

464. Where new residential and other sensitive uses are proposed close to existing noise- and other potentially nuisance-generating development, Policy D13 of the London Plan 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.
465. In the vicinity of the site, there are a range of existing businesses. These businesses currently coexist with nearby residential uses. All proposed

residential units would be specified to ensure reasonable resistance to sound such that these nearby noise-generating uses would not be at risk of having their operations compromised and/or any future growth unreasonably curtailed. No issues are foreseen in respect of the nearby uses and public transport services being unable to function/coexist with and grow alongside the proposed non-residential uses.

466. For the reasons given above, the application complies with relevant NPPF, London Plan and Southwark Plan policies in respect of mitigating the impact of existing nuisances as the responsible 'agent of change'.

Light pollution

467. With respect to light pollution from internal sources, this typically is an issue where light is emitted from artificial sources, such as commercial offices, towards:
- residential accommodation (where this would cause a nuisance to occupants); or
 - natural environments where the existing level of external lighting is limited.
468. Given the urban environment, surrounding buildings and street lighting, the proposed development is unlikely to result in a significant change to the existing lighting levels. Furthermore, the façade detailing will break up the night-time illumination. The operational hours of the commercial development will be restricted through condition. Accordingly, it can be concluded that no undue effects would result from the occupation of the proposed residential uses, nor the commercial uses given that these are all contained at ground floor level.
469. With respect to light pollution from externally-affixed sources, buildings close to existing residential uses are not typically fitted with external lighting above ground floor level in the interests of minimising amenity harm to the surroundings. The final external lighting proposals, including any pre-determined dim-down and turn-off times, will be agreed through the Final Lighting Strategy, to be approved by the Council prior to first occupation of the building; this will be secured by condition.

Fire safety

470. Policy D12 of the London Plan expects all development proposals to achieve the highest standards of fire safety and to this end requires applications to be supported by an independent Fire Strategy, produced by a third party suitably qualified assessor.
471. A Fire Strategy was submitted with the application. The Fire Strategy includes a Planning Gateway One form, a requirement of the HSE for all referable planning application submissions. Among other things, the Fire Strategy confirms that:

- Both buildings would be served by at least two stairs for means of escape and fire service operations, and at least one fire-fighting shaft;
- Additional firefighting lift provided to core B of the PBSA block (totalling 2 firefighting and 1 evacuation lift), serving all floors above ground;
- enhanced cavity barriers and fire stopping to be provided within the external walls, to further prohibit unseen smoke and fire spread via the external wall cavity;
- the main distribution risers are to be provided with additional horizontal fire stopping, every 4 floors, to reduce the risk of a fire spreading more than 12-16m vertically via the distribution risers;
- increased fire separation (vertically) between the PBSA block and commercial block with separating wall between the two buildings achieving 240 minutes fire resistance in terms of loadbearing capacity, integrity, and insulation;
- sprinklers system will be provided;
- for the PBSA building, the 'means of escape' would be a 'stay-put' means of escape strategy would apply;
- for the commercial building, the 'means of escape' would be a 'simultaneous evacuation' would apply (i.e. upon detection activation all areas will evacuate immediately);
- appropriate active fire protection systems would be installed, including fire detection and alarm, emergency lighting and signage, smoke control systems in both blocks and sprinklers in all the units, common circulation areas and all ancillary accommodation that are up to 100m² in the PBSA block);
- in the case of an emergency, the evacuation lifts in both blocks would switch from their everyday use to becomes a tool only for the evacuation of persons with disabilities and is not considered a general escape route; and
- Building Regulations Approved Document B compliance would be achieved.

472. The Fire Strategy was produced by fire risk engineering consultancy Orion Fire. The contents of the document have been checked and approved by a certified fire risk engineer (a Member of the Institution of Fire Engineers (MIFireE)).

473. In response to the comments received from HSE, the applicant provided justification for the proposed length of the horizontal pipework between the dry riser inlet points and the point where pipe becomes vertical and clarified that all cluster apartments in Block A are provided with a protected cluster corridors that are accessed directly from the common residential lobby/corridor in accordance with BS 9991. The HSE subsequently has confirmed the fire strategy is satisfactory and any technical fire safety technical details will be assessed at the Gateway 2 and building control stages.

474. On account of the above, the relevant fire risk minimisation policies of the London Plan are deemed to have been satisfied, with due regard to the guidance within the Fire Safety London Plan Guidance 2022.

475. A condition is recommended to ensure the construction and in-use operation of the building are carried out in accordance with the Fire Strategy.

Energy and sustainability

476. Chapter 9 of the London Plan deals with all aspects of sustainable infrastructure and identifies the reduction of carbon emissions as a key priority. Policy SI2 “Minimising Greenhouse Gas Emissions” requires all developments to be net zero carbon with a minimum on-site reduction of 35% against the Part L 2021 baseline for both commercial and residential uses. Residential development and non-residential development should achieve a 10% and 15% reduction in emissions through energy efficiency measures respectively. Where developments are unable to meet net zero carbon targets any shortfall between the minimum 35% and zero carbon must be mitigated by way of a payment towards the carbon offset fund. The energy strategy for new developments must follow the London Plan hierarchy (comprising ‘be lean’, ‘be clean’, ‘be green’ and ‘be seen’) and this must be demonstrated through the submission of an Energy Strategy with applications, as well as post construction monitoring for a period of 5 years.
477. Southwark Plan Policies P69 and P70 reflect the approach of the London Plan by seeking to ensure that non-residential developments achieve a BREEAM rating of ‘Excellent’ and include measures to reduce the effects of overheating using the cooling hierarchy. The policies pursue the ‘lean, green, clean and seen’ principles of the London Plan and require non-residential buildings to be zero carbon with an on-site reduction of at least 40% against the Part L 2021 baseline. Any shortfall must be addressed by way of a financial contribution towards the carbon offset fund.

Energy and carbon emission reduction

Be Lean

478. In terms of meeting the ‘be lean’ tier of the hierarchy, a range of passive and active measures are proposed. These measures include:
- ensuring optimum for passive solar heat gain and daylight penetration whilst reducing excessive solar gains through building orientation, solar shading and a balanced proportion of solid wall to glazing;
 - specifying energy efficient fabric and air tightness of the building to enhance thermal performance;
 - installing high-efficiency LED lighting with automatic presence detection controls in circulation and amenity spaces, as well as daylight dimming to the amenity spaces and communal kitchen areas, and lighting controls to the student accommodation units via manual switches; and
 - Allowing natural ventilation using automated louvres and manually openable windows for the Fab Labs

479. These ‘demand reduction’ measures will achieve an 8% reduction in carbon emissions over Part L 2021 in respect of the PBSA which falls short of the 10% London Plan target. In respect of the non-residential uses, an 25% reduction would be achieved which substantially exceeds the 15% target. Overall, 10% carbon emissions reduction has been achieved through these ‘demand reduction’ measures, and the Energy Statement demonstrates that a fabric first approach has been adopted. This is evidenced by the space heating demand for both uses being substantially below the GLA Energy Guidance benchmarks as shown in the table below.

Space heating demand and EUI performance:				
Uses	Energy Usage Intensity (EUI) (kWh/m2/ye ar)	Space heating demand (kWh/m2/ye ar)	EUI value from Table 4 of the GLA Energy Assessment Guidance (kWh/m2/ye ar)	Space heating demand from Table 4 of the GLA Energy Assessment Guidance (kWh/m2/year)
Non-domestic	55.38	5.47	55	15
PBSA	38.93	1.32	55	15

Be Clean

480. The site is located in a heat network priority area (HNPA) and is located close to the proposed future route of the South East London Combined Heat and Power (SELCHP). The applicant has engaged proactively with the SELCHP operator (Veolia) and confirmed that they are committed to district heating network connection to the PBSA prior to first occupation. A plant room will be provided and the indicative pipe route has been identified.

481. As the vast majority of the self-storage will be heated for frost protection only and the heating demand will be low, no immediate District Heat Network (DHN) connection is allowed for this part of the site. For the light industrial affordable workspace Fab Lab units, Variable Refrigerant Flow (VRF) system is proposed which is welcome from a carbon emission reductions perspective. However, the applicant expects the fit out of the VRF system to be carried out by the affordable workspace operator which is not supported given the costs burden on the operator. It is expected that the rent free period for the affordable workspace lease would need to reflect the fit-out costs. This matter would be further discussed with the applicant and the potential affordable workspace operator and secure the agreed arrangement in the final S106 Agreement.

482. Furthermore, a S106 obligation has been agreed with the applicant to secure a DHN Energy Strategy to demonstrate how the non-residential development will be designed and built so that all parts of it will be capable of connecting to any future DHN. This meets the requirements of Policy SI 3 of the London Plan.

483. National Calculation Methodology (NCM) and Part L require the carbon emission factor used for a notional building to be the same if the DHN is "existing". As a result, there is no change between the Be Lean and Be Clean stages as they are using the same notional system. However, if the DHN network was modelled as "new" then a higher notional DHN carbon emission factor of 0.233 is used for the baseline and Be Lean, meaning the Be Clean betterment would be 53%.

Be Green

484. With respect to the 'be green' tier of the hierarchy, the applicant has proposed the following technologies:

- Air Source Heat Pumps for active cooling and back up energy source to serve the PBSA; and
- photovoltaic panels at roof level generating a total of 89.2kWp and annual energy yield of 90,245 kWh across the PBSA and commercial buildings.

485. These 'be green measures' would reduce carbon emissions by 14% for the residential uses and 184% for the non-residential. On a side-wide basis, this equates to a reduction of 39%. The applicant has demonstrated that opportunities for renewable energy by producing, storing and using renewable energy on-site have been maximised.

486. Be Seen

Introduced as part of the London Plan 2021, 'be seen' is the newest addition to the GLA's energy hierarchy. It requires developments to predict, monitor, verify and improve their energy performance during end-use operation. All applications should conduct a detailed calculation of unregulated carbon emissions as part of the compliance with the 'be seen' policy and associated guidance.

487. The applicant's Energy Statement states that a suitable metering strategy will be implemented to record energy consumption and generation from the point at which the different uses within the development are occupied. It is recommended that the on-going requirements for monitoring energy consumption and generation, and the associated reporting to the GLA in line with policy, be secured through a planning obligation.

488. Total energy savings

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.

489. The proposal would reduce on-site regulated carbon dioxide emissions by 39% over a notional building minimally compliant with the Building Regulations 2021, which meets the London Plan 35% minimum target. The performance is summarised in the below table:

490. **CO2 emissions from each stage of the Energy Hierarchy: Summary table**

	Total Regulated Emissions	CO2 Savings	Percentage saving
Part L 2021 Baseline	32.8 tonnes CO2		
With Be Lean applied	29.5 tonnes CO2	3.3 tonnes CO2	10%
With Be Clean applied	29.5 tonnes CO2	0	0
With Be Green applied	20.2 tonnes CO2	9.3 tonnes CO2	28%
Cumulative saving		12.6 tonnes CO2	<u>39%</u>
Shortfall on carbon zero	20.2 tonnes CO2		

491. Whilst the carbon emissions reduction performance measured in percentage over the baseline may not appear as high as other schemes, as mentioned in earlier in the 'Be-Clean' section of this report, it is mainly because connection to an 'Existing' DHN results in a lower the baseline scenario. If DHN is considered as 'New', the overall carbon emissions reduction will be 81%. Immediate connection to DHN to serve the proposed PBSA is a result of detailed discussion between GLA and Southwark officers and the applicant and is strongly supported. Any further technical adjustments to the Energy Strategy will be dealt with under GLA Stage II referral.

492. The energy savings, as detailed above, which take into account the decarbonisation of the electricity grid, demonstrate the good environmental and sustainability credentials of the proposed development. The total per annum shortfall in savings relative to carbon zero would, at a rate of £95/tonne for 30 years, generate an offset contribution of **£57,462**. The offset contribution will be secured in the Section 106 Agreement, with appropriate adjustment clauses should there be any improvements to the carbon emissions in the post-planning design development stages.

493. Whole life cycle and carbon capture

London Plan Policy SI2 requires all major development proposals to be supported by a whole life cycle carbon assessment. This assesses the embodied and operational emissions associated with redevelopment.

494. 'Embodied carbon' is the term used to describe the carbon emissions associated with:

- extraction and manufacturing of materials and products;
- in-use maintenance and replacement;

- end of life demolition, disassembly and disposal; and
 - the transportation relating to all three.
495. 'Operational carbon' is the carbon dioxide associated with the in-use operation of the building. This usually includes carbon emissions associated with heating, hot water, cooling, ventilation and lighting systems, as well as those associated with cooking, equipment and lifts.
496. Driven by the aim of achieving net carbon zero for new development by closing the implementation gap, whole life cycle carbon assessments are monitored at the pre-application, submission and post-construction stages. Policy P70 of the Southwark Plan reinforces the need to calculate whole life cycle carbon emissions through a nationally recognised assessment and demonstrate actions taken to reduce life cycle carbon emissions.
497. The submitted whole life carbon assessment for the planning application considers the operational carbon and embodied carbon of the proposal throughout its life from construction, use and deconstruction. The assessment finds that over a 60-year study period, the development's operational and embodied load would be:
- 650 kgCO₂e/m² for Modules A1-A5 (covering the product sourcing and construction stages); and
 - 468 KgCO₂e/m² for modules B to C (covering the in-use and end-of-life stages), excluding operational energy and water.
498. For predominantly residential developments, the benchmark set by the GLA for Modules A1-A5 is 850kgCO₂e/m², with an aspirational benchmark of 500 kgCO₂e/m² GIA. The benchmark for Modules B-C is 350kgCO₂e/m², with an aspirational benchmark of 300kgCO₂e/m². Therefore, the proposed development meets the GLA benchmark for Modules A1-A5 but falls short of the benchmark for Modules B-C (excluding B6 and B7). The WLC Assessment also identifies the following measures to be considered at the next stage of the design of the development:
- Concrete with 50% GGBS to all elements apart from core walls with 20% GGBS
 - Low carbon rebar (0.33 kg CO₂e/kg)
 - Timber/ aluminium windows.
- If these measures are implemented, approximately further 9% upfront carbon reduction will be achieved resulting a decrease of carbon from 651 kg CO₂e/m² to 595 kg CO₂e/m². Any further technical adjustments to the Energy Strategy will be dealt with under GLA Stage II referral.
499. A condition to require whole life-cycle carbon assessment in the completion stages is proposed.

Circular Economy

500. Southwark Plan Policy P62 states that a Circular Economy Statement should accompany planning applications referable to the Mayor. Circular economy principles include conserving resource, increasing efficiency, sourcing sustainably, designing to eliminate waste and managing waste sustainably at the highest value. London Plan Policies GG5, D3 SI7 and all mention circular economy principles and the benefits of transitioning to a circular economy as part of the aim for London to be a zero-carbon city by 2050.
501. A detailed Circular Economy Statement was submitted with the application, which sets out strategic approaches, specific commitments and the overall implementation approach.
502. The broad strategic approaches for the development include adopting lean design principles, minimising waste, specifying materials responsibly and sustainably, and designing for longevity, adaptability and flexibility. Ways this will be achieved include:
- using 20% Ground Granulated Blast-furnace Slag (GGBS) in concrete; use of rebar with 97% recycled content for substructure and superstructure;
 - using only FSC timber products;
 - minimising material use through prefabrication off-site for bathroom units;
 - Using higher recycled content - carpet tiles and metal doors
503. Specific targets committed to by the applicant include:
- diverting at least 95% of the waste from going into landfill;
 - making beneficial use of at least 95% of excavation waste;
 - ensuring the contractor prepares and implements a Site Waste and Resource Management Plan (SWMP/RMP); and
 - meeting an overall target of 20% reused or recycled content based on value of materials.
504. Circular Economy Reporting sheet estimates that 95 % of the total building material will be recycled. Any further technical adjustments to the Energy Strategy will be dealt with under GLA Stage II referral.
505. The application has addressed the requirements of London Plan Policy SI7, Southwark Plan Policy P62, and has referenced the GLA's guidance in producing the Circular Economy Statement. Conditions are proposed requiring post-completion reporting. Subject to these conditions, the proposal is considered to comply with the sustainable materials element of Policy P17.

Overheating and cooling

506. London Plan Policy SI4 details that major development proposals should demonstrate how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy. Policy P69 of the Southwark Plan states that development must reduce the risk of

overheating, taking into account climate change predictions over the lifetime of the development, in accordance with the cooling hierarchy.

507. The six-step hierarchy that should be followed when developing a cooling strategy for new buildings 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).

508. The following paragraphs explain how the applicant has pursued this six-step process.

Minimise internal heat generation

509. In both the residential and non-residential elements of the development, internal heat generation is to be minimised through measures including efficient layout of communal pipework, with high levels of insulation for PBSA building and electric panel heaters and instantaneous hot water to eliminate heat gains from communal pipework for the commercial building.

Reduce heat entering the building

510. The heat entering the proposed development is to be reduced by a combination of measures. For the PBSA building, these include reasonable window to wall ratios provided with raised sill heights, low G-value glazing specified ($G=0.28$), recessed windows with ~200mm sills and reveals, and brise soleil features over the windows in the east and west parts of the façade, high levels of insulation specified and incorporation of green roofs. For the commercial building, these include north-facing orientation to glazing in occupied spaces, window to wall ratio reduced, and high levels of insulation specified.

Manage the heat within the building

511. Good floor-to-ceiling heights are proposed in both the residential and non-residential parts of the proposed development. Double layer of high-density plasterboard included to internal walls. Thermal contact with floor slabs via floating screed. The applicant's Overheating Assessment confirms that thermal mass has been factored into calculations and that this will help to offset temperatures when the building becomes cooler. Where possible in the Fab-Labs, exposed concrete will assist with thermal mass.

Use passive ventilation

512. With regard to the residential uses specifically, a number of passive ventilation measures are proposed. Openable windows are provided to all occupied spaces for the PBSA building. Mechanically actuated louvres are proposed for Fab Labs.
513. In a scenario where only passive measures (i.e. no mechanical or active measures) are incorporated into the residential parts of the development, in some instances there would be a failure to achieve the recommended level of summer comfort. This is due to limitations with naturally ventilating the occupied spaces due to high ambient external noise levels and security restraints that prohibit fully unrestricted opening of windows. As such, the applicant had to proceed to stage 5 of the cooling hierarchy (as discussed below).
514. Turning to the commercial uses, for which equipment and occupancy gains are two most common sources of overheating risk. Natural ventilation is proposed to the Fab Labs using a combination of manually openable windows to provide occupant thermal comfort and high-level actuated louvres that ensure comfortable conditions can be maintained when Fab Lab units are unoccupied.

Use mechanical ventilation

515. With regard to the PBSA building, mechanical ventilation with heat recovery (MVHR) and mechanical purge ventilation are provided to corridors, bedrooms, studios and communal kitchens of the PBSA. Regarding the commercial building, mechanical ventilation provided to reception and ancillary space.

Use active cooling systems (low carbon)

516. Due to the steps taken in accordance with the cooling hierarchy, as set out above, the need for cooling to avoid overheating risk throughout the year would be reduced across all the proposed uses. The applicant has minimised the areas required for active cooling to the amenity spaces of the PBSA and reception and ancillary spaces of commercial parts of the proposal. This active cooling would take the form of highly efficient Variable Refrigerant Flow system, utilising heat pumps.

Summary

517. Following the cooling hierarchy, the applicant has demonstrated that the building cooling demand has been kept as low as possible with minimal solar gains, in line with the criteria set out in CIBSE TM 52 and TM 59 guidance. With the proposed measures taken into account, the overall efficiency of the development would be enhanced. This is considered to be in compliance with London Plan Policy SI4 and Southwark Plan Policy P69.

BREEAM

518. Policy P69 of the Southwark Plan states that non-residential development must achieve a BREEAM rating of 'Excellent'. The applicant's BREEAM pre-assessment demonstrates that 'Excellent' (minimum 70%) can be achieved for all the proposed uses:

- 75.49% for student accommodation
- 80.89% for self-storage facility
- 76.98% for Fab Labs

A planning condition is recommended to secure this.

Water efficiency

519. The Sustainability Statement submitted by the applicant confirms that the proposed development aims to minimise water consumption such that the BREEAM excellent standard for the 'Wat 01' water category would be achieved, as required by London Plan Policy SI5. This will be achieved through the specification of features such as:

- water efficient fixtures and fittings including low flush toilets and low flow taps;
- water metering to encourage the monitoring and benchmarking of water consumption while the building is in operation.

Communications and aviation

Digital connectivity infrastructure

520. 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.

521. To ensure London's long-term global competitiveness, Policy SI6 "Digital Connectivity Infrastructure" of the London Plan 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.

522. Although a Utilities Assessment accompanies the planning application, the applicant has not confirmed in writing that the development would have the incoming duct arrangements to suit the provisions from the local networks, or that by the time construction works are underway 1GB/s fibre should be available. In this District Town Centre location, it is very unlikely that delivering such digital infrastructure would prove difficult; therefore, it is considered acceptable in this instance for the requirements of Policy SI6 post-decision through a Digital Connectivity Strategy planning condition.

Television, radio and telecommunications networks

523. The NPPF requires local planning authorities to consider the potential for new development to interfere with broadcast and electronic communications services, and to mitigate this adequately. Part C of London Plan Policy D9, which is concerned with the functional impacts of tall buildings, echoes this, requiring that “buildings, including their construction, should not interfere with [...] telecommunication”.
524. Proposed buildings that are tall and/or broad, and in particular this proposal have the potential to reduce coverage of mobile phone networks. Arqiva has confirmed no objection. No harmful impacts are anticipated.

Aviation

525. The NPPF recognises the need for new development to maintain the national network of general aviation airfields, and their need to adapt and change over time. Part C of London Plan Policy D9 requires tall buildings not to interfere with aviation or navigation.
526. No consultation response has been received from the Civil Aviation Authority or NATS in relation to this planning application. Given the height of this proposal relative to nearby tall building in Bermondsey Heights at 227-255 Ilderton Road and phase 2 of the Tustin Estate. It is reasonable to conclude that the proposed tall buildings would not cause any harmful aviation impacts.

Economic impacts

527. London Plan Policy E11 requires development proposals to support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases. This requirement is also covered by Southwark Plan Policy P28, with the methodology for securing these opportunities prescribed by the Council’s Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015 with 2020 Update)

Direct on-site employment and training

528. In accordance with the policy framework, there would be a requirement for this development to deliver training and employment during the construction phase only. 16 construction industry apprentices, 63 short courses and 63 sustained jobs for unemployed Southwark Residents would be required. These would all need to be filled by the applicant in accordance with a Construction Phase Employment, Skills And Business Plan. These obligations will be secured through the Section 106 Agreement.
529. Applying the metrics advised by the Homes and Communities Agency Employment Density Guide, the existing warehouse uses currently have the potential to employ a combined total of just over 20 people. However, the existing warehouse has been vacant.

530. The applicant suggests that the proposed self-storage facility will directly employ around 3-4 full time employees and the PBSA will employ at least 5 staff. The proposed Fab labs (which contain 825 NIA square metres of non-residential floorspace), would support up to 17 FTE positions, depending on the particular type of employment for which the units are ultimately used.
531. Overall, the proposed development would deliver up to 25 FTE positions, representing an uplift of up to 25 on the site's current employment given the premises are vacant now. It would satisfy the aims of the London Plan and the Southwark Plan in creating new jobs within the Opportunity Area.

Social and community integration

532. The strategic policies of the Southwark Plan, in particular Policies ST1 and SP2, expect new development proposals to foster mixed and integrated communities, noting that environments should seek to promote inclusivity and interaction to help achieve this.
533. It is noted that there is a concern that delivering a student housing led scheme of this size and density, which would only provide for one generation, is ill fitted to the location.
534. Due to their inherently transient nature, student populations can prove more challenging to integrate into their local community. Cognisant of this, and mindful of the possibility of students being introduced at the 313 Ilderton Road, the applicant has taken the feedback from the Community Review Panel, which aided in the design decisions to:
- integrate a café within the PBSA block to bring different groups together;
 - provide Fab Labs which would be affordable workspace with local community being given the priority for the tenancy;
 - provide a cycle workshop within the PBSA block to allow local community to use the bike repair service; and
 - provide 50 square metres free exhibition space within the development for local communities for 200 hours per year.

For these reasons, it is considered that the applicant has made adequate efforts to respond to the strategic objectives of the Southwark Plan and London Plan to integrate the 592 students with the future resident community as well as the wider existing residents. It is not considered on balance that the 592 student residents this scheme would introduce, when coupled with the other student homes schemes nearby, would give rise to an imbalanced, unintegrated or mono-cultural community.

Health impacts

535. The evidence base to the OKR APP includes a health impact assessment (forming part of a wider Integrated Impact Assessment), the conclusions of which are threaded through and underpin the content and policies of the draft AAP. As such, whilst a site-specific Health Impact Assessment (HIA) has not been

submitted, in accordance with the expectations of the draft AAP, the application would assist in tackling local health inequalities and delivering health outcomes. Some examples are given below:

- the design of the development should follow good practice such as the Secured by Design
- the proposal could, through its Community Infrastructure Levy liability, assist the Council to support and invest in relevant healthcare, educational and community bodies;
- optimising potential for training and employment opportunities by working in collaboration with the Council to develop a bespoke employment strategy.

536. As detailed in the earlier applicable parts of his report, the development would secure measures and mitigation to achieve all of the above. It is considered that due consideration has been given to equalities considerations, and having regard to the importance given to improved health outcomes by the NPPF, Policies GG3 and GG4 of the London Plan and Policy P45 of the Southwark Plan

Planning obligations

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

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

In accordance with the Section 106 Planning Obligations and CIL SPD, a suite of contributions have been agreed with the applicant in order to mitigate the impacts of the development. These are listed in detail at Appendix 7 of this report. In summary, the financial contributions (which total £21,685,171) are:

- Affordable Housing Contribution: £20,700,000 (subject to BCIS All in Tender Price Index)
- Public Transport Contribution: £534,600 (BCIS index linked from 2019)
- Bus Stops Enhancement Contribution £100,000 (BCIS index linked)
- Legible London Signage Contribution: £30,000 (BCIS index linked)
- Cycle Hire Docking Station Contribution: £18,789 (BCIS index linked)
- Delivery and Servicing Monitoring Fee: £1,600 (RPI All Items index linked)
- Total Carbon Green Fund Contribution: £57,462 (RPI All Items index linked).
- Old Kent Road Public Open Space Contribution: £242,720.00 (BCIS index linked)

538. A number of contingent/default financial obligations will also apply. These will require a financial contribution in the event of a failure to deliver all or part of the following development benefits/mitigation:
- Total Carbon Green Fund Contribution: £57,462 (RPI All Items index linked).
 - Agreed greenfield run-off rates;
 - Agreed delivery and servicing baseline activity;
 - Agreed number of construction employment, training and apprenticeships; and
 - Agreed number of new trees.
539. Appendix 7 should be referred to for the full detailed set of the obligations sought to mitigate the development's impacts. Many of the obligations, although not a financial contribution per se, are extensive in nature. The appendix also include the applicant's current position in relation to each of these requested obligations.
540. In the event that a satisfactory legal agreement has not been entered into by 10th June 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 mitigation against the adverse impacts of the development through projects or contributions, contrary to: Policy DF 1 (‘Planning Obligations’) of the London Plan 2023; Policy IP3 (‘Community Infrastructure Levy (CIL) and Section 106 Planning Obligations’) of the Southwark Plan; and the Southwark ‘Section 106 Planning Obligations and Community Infrastructure Levy SPD’ 2015”.

Mayoral and Borough Community Infrastructure Levies

541. 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 Borough CIL is therefore a material consideration. However, the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport investments in London as a whole, while the Borough CIL will provide for infrastructure that supports growth in Southwark.

PBSA Borough CIL rates criteria

542. The site is located within Southwark CIL Zone 2 and MCIL2 Band 2 zone. Based on the floor areas provided by the agent's CIL Form 1 (dated 30 June 2023), the gross amount of CIL is approximately £4.95 million comprising £1.99 million of Mayoral CIL and £2.96 million of Southwark CIL.
543. It should be noted that as all 592 PBSA bedspaces are direct-let, the higher borough student CIL rate of £109 per square metre (plus 2024 indexation) has been applied for this CIL estimate.

544. It should be noted that this is an estimate, and the floor areas on approved drawings will be checked and the “in-use building” criteria will be further investigated, after planning approval has been obtained. CIL phasing details must be agreed with CIL team prior issue of planning decision notice

Community involvement and engagement

545. This application was accompanied by a Statement of Community Involvement, confirming the public consultation that was undertaken by the applicant during the pre-application phase. The table below summarises this consultation:

Consultation undertaken by applicant: Summary table	
<u>Date</u>	<u>Form of consultation</u>
Meetings (Pre-application phase)	
August 2022	<ul style="list-style-type: none"> • Meeting held with two of the three Old Kent Road ward councillors.
October 2022	Meeting held with: <ul style="list-style-type: none"> • Renewal (developers of New Bermondsey Quarter) • Vital OKR; • Barratt (Developers of Bermondsey Heights) • Winslade Estate TRA • Tustin Estate TRA • New Cross Gate ward councillors • Ilderton Primary School • Christ Apostolic Church Surrey Docks
November 2022	<ul style="list-style-type: none"> • Community Review Panel (round 1)
January 2024	<ul style="list-style-type: none"> • Community Review Panel (round 2)
Public Consultation Events (pre-application phase)	
October 2023	<ul style="list-style-type: none"> • Door knocking campaign; • Public exhibition on site • Website launch;

546. Included within the Statement of Community Involvement are the consultation materials that were circulated as part of the pre-application engagement exercise. A summary of each topic raised by the community feedback is also provided, along with details of how the applicant responded. The pre-application consultation undertaken by the applicant was an adequate effort to engage with those affected by the proposals.

547. Although no direct community engagement was undertaken by the application at the planning application stage, following closure of the Council's public consultation process, the applicant prepared a 'response' letter together with additional documentation addressing the matters raised. The extent and format of application stage community engagement is considered adequate.
548. The Council, as part of its statutory requirements, sent letters to surrounding residents, issued a press notice publicising the planning application and displayed notices in the vicinity of the site. Details of the consultation undertaken by the Council are set out in the appendices. The responses received are summarised earlier in this report.

Consultation responses from external consultees

Arqiva

549.
 - No objection
 - **Officer response:** Noted.

Environment Agency

550.
 - No objections/comments.
 - **Officer response:** Noted.

Greater London Authority

551. The detailed Stage 1 response from the Greater London Authority is published on, and can be read in full at, the Council's Public Access for Planning Register. Generally, the response was supportive of the development. Below is a summary of the matters raised with an officer response to each:

- Land use principles: The proposed intensification of the site to provide Purpose-Built Student Accommodation (Sui Generis) and an uplift in industrial floorspace (Class B8 and E(g) (iii)) is acceptable in principle subject to a Grampian obligation restricting development prior to a BLE construction contract being in place.

Officer response: *The applicant has agreed on the required Grampian obligation.*

- Student accommodation: the development proposes 615 student bedrooms with 35% on-site affordable student bedrooms, which is supported in principle in accordance with Policy H15. A nomination agreement should be secured via S106.

Officer response: *As discussed in the earlier part of this report, during the course of the application, upon the request from Southwark officers, the applicant has amended the affordable*

housing offer to make a financial contribution towards off-site conventional affordable housing delivery in the borough. The revised FVA was shared with the GLA officers. The applicant has then provided further evidence. The Council's viability assessor has confirmed that the applicant's affordable housing contribution is the maximum viable amount subject to early and late stage reviews which would be secured through the S106 Agreement.

- **Urban design:** The site is in an area suitable for tall buildings. The proposed development layout, scale and massing are generally supported. Further details regarding the articulation and overall appearance of the tower element of the proposal are required.

Officer response: *The applicant has amended the scheme to address the feedback and the GLA officers have been re-consulted on the revised scheme and confirmed that majority of the comments have been positively addressed.*

- **Transport:** Further information is required in relation to the ATZ assessment, disabled car parking, cycle parking, delivery and servicing, construction logistics, Student Management Plan, and the proposed Travel Plan.

Officer response: *The applicant has submitted an ATZ assessment and provided the justification of the disabled car parking provision. Cycle parking, the delivery and servicing plan, construction logistics and student management plan, Travel Plan have all been amended. Conditions are also recommended to ensure final details and compliance. Officers considered that the issues have been broadly addressed and any technical matters and S106 obligations can be resolved at the GLA Stage II referral.*

- **Sustainable development and environmental issues:** Further information is required on energy, whole-life cycle carbon, circular economy, biodiversity, green infrastructure, flood risk, sustainable drainage, and air quality.

Officer response: *These technical details have also been updated. GLA officers have been re-consulted. Officers considered that the issues have been broadly addressed and any technical matters can be resolved at the GLA Stage II referral.*

- Other issues on heritage, accessible development, strategic views also require resolution prior to the Mayor's decision making stage.

Officer response: *These issues have been assessed in the earlier part of the report. Any technical matters can be resolved at the GLA Stage II referral.*

Historic England

552. • No objection/comments.
 - **Officer response:** Noted.

London Borough of Lewisham

553. • Did not wish to comment.

London Fire and Emergency Planning Authority

554. • Did not wish to comment.

Metropolitan Police

555. • No objection subject to a two part ‘Secured by Design’ condition being applied.
 - **Officer response:** The suggested condition has been included on the draft decision notice.

National Air Traffic Services (NATS) Safeguarding

556. • No objection/comments.
 - **Officer response:** Noted.

National Grid UK Transmission

557. • Did not wish to comment.

National Planning Casework Unit

558. • Did not wish to comment.

Natural England

559. • Did not wish to comment

Network Rail

560. • Did not wish to comment

Thames Water

561. • No objections subject to recommended conditions to secure piling method statement and all water network upgrades or agreement on development and Infrastructure Phasing Plan prior to occupation of 101th dwelling. Some informatives are also suggested.
 - **Officer response:** *The conditions are recommended.*

Transport for London (TfL) – Active Travel England

- 562.
- No objection/comments.
 - **Officer response:** Noted.

Transport for London (TfL) – Bakerloo Line Extension Safeguarding Unit

- 563.
- No objection/comments, as the site lies just outside the Safeguarding Zone.
 - **Officer response:** Noted.

Transport for London (TfL) – London Underground / Docklands Light Railway Infrastructure Protection

- 564.
- No objection/comments.
 - **Officer response:** Noted.

Transport for London (TfL) – Spatial Planning

- 565.
- ‘TfL – Spatial Planning’ provided comments as part of the GLA Stage 1 referral process. These comments been provided under an earlier paragraph entitled “Greater London Authority”, and an officer response has been given to each matter raised.

UK Power Networks

- 566.
- Did not wish to comment.

Community impact and equalities assessment

- 567.
- 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.
568. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.
569. The Council must not act in a way which is incompatible with rights contained within the European Convention of Human Right
570. Whilst a Equalities Impact Assessment has not been submitted, the Council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application. The positive impacts have been identified throughout this report. They include:
- Accommodation - accessibility: 10% of the PBSA would be wheelchair accessible, as would all of the ancillary and common spaces within the host buildings.
 - Employment and training opportunities: Local unemployed people would benefit from jobs and training opportunities connected with the construction stage.
 - Improved and more accessible public realm: The proposed public realm, as well as the agreed improvements to footways and highways within the vicinity of the site, would all be designed to assist people with mobility impairments. Physical measures such as level or shallow gradient surfaces and dropped kerbs would benefit disabled and older people in particular.
 - Public safety: Safer public spaces (through the various proposed active and passive security and surveillance measures) would benefit all groups, but in particular older people, disabled people, women, LGBTQIA+ people and transgender people. Cycle stores and entrances would be secure-accessed, well naturally surveilled and lobbied to prevent tail-gaiting, complemented by CCTV surveillance.
 - Religious groups: There is a church on the opposite of Ilderton Road. It is not considered that this development would prejudice the operation of the church in any way.
 - Transport: Wheelchair parking spaces and cargo bike spaces (the latter being capable of transporting disabled users) would also provided.
571. Officers are satisfied that equality implications have been carefully considered throughout the planning process and that Members have sufficient information available to them to have due regard to the equality impacts of the proposal as required by Section 149 of the Equality Act 2010 in determining whether planning permission should be granted.

Human rights implications

572. 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.
573. This application has the legitimate aim of redeveloping the site for comprehensive development comprising large scale purpose built student accommodation units, affordable workspace, self storage, public realm improvements, landscaping and other associated works. 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.

574.

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

CONCLUSION

575. This application would bring into productive and optimised re-use this underutilised site, providing a complementary mixture of students homes, light industrial units and self storage. These uses would be supported by high quality hard- and soft-landscaped new public realm. The proposal would also enable major new transport infrastructure upgrades, enhancing links with the surrounding areas by providing safe and accessible walking, cycling and public transport routes. This would on balance, subject to the payment of a PIL for affordable housing support the aspirations of the Old Kent Road Opportunity Area as set out in the adopted site allocation (NSP70) and the draft site allocation (OKR16).
576. Prior to the submission of the planning application, the applicant engaged in pre-application discussions with the Council, the Greater London Authority, Transport for London, the Health and Safety Executive and the Old Kent Road Community Review Panel, amongst other stakeholders. Extensive public consultation with local residents, including the relevant TRAs, has also been undertaken.
577. The design evolution of the proposed development is a reflection of the extensive pre-application process. The careful façade modelling and confident

crown designs are reflective of the buildings' quality along eastern side of Ilderton Road within the Opportunity Area where tall buildings are anticipated. The buildings would contribute positively to the local townscape. Through optimised active frontages and celebrated entrances, the development would provide an engaging and animated interface at street level.

578. There is support in the London Plan and Southwark Plan and draft OKR AAP for student housing, which contributes to the provision of affordable housing, and a mixed and inclusive neighbourhood. Given the context of development this scheme is coming forward in which includes a mix of conventional housing including affordable housing it is considered on balance to contribute to a mixed and inclusive neighbourhood. In a well-connected location with some HEIs a short bus ride away, the site is considered to be appropriate for student accommodation, meeting a demonstrable need and achieving compliance with the requirements of Southwark Plan Policy P5. Mindful of the importance of integrating the student population successfully with the existing and future local communities, the proposed development incorporates 1,030 square metre light industrial workspace (100% affordable workspace), 109.6 square metre publicly accessible café, 95.4 square metre cycle workshop and 50 square metre free exhibition space for local communities for 200 hours per year. The applicant developed the proposals working closely with the probable operator of the PBSA, who have considerable experience of managing student housing being the UK's largest independent provider.
579. The proposal would be a direct-let scheme and would not include any affordable student rooms. As no conventional affordable housing is proposed within the redevelopment, a payment-in-lieu is proposed of £20,700,000 (index-linked), which equates to 35% affordable housing by habitable room. The payment-in-lieu could potentially be used to directly support the delivery of affordable housing close to the application site. The payment-in-lieu is therefore considered to be a benefit of the application.
580. Transport and highways matters have been satisfactorily addressed by the application documents, with detailed arrangements and mitigation to be secured through planning conditions and obligations.
581. In terms of energy and sustainability, the proposals would meet the London Plan 35% target, achieving cumulative carbon savings of 39% against the Part L 2021 baseline. The proposals would meet the Mayor's Whole Life Cycle benchmarks. Alongside securing 350.07% biodiversity net gain, the proposal would achieve a UGF score of 0.4 – the latter achieved through features such as green and intensive roofs, connected tree pits and green walls. Subject to compliance with the detailed energy and sustainability strategies submitted with the planning application and payment of the Carbon Green Fund, the development satisfactorily addresses climate change policies.
582. It is therefore recommended on balance that planning permission is granted, subject to:
- conditions as set out in the attached draft decision notice;

- referral to the GLA;
- the timely completion of a Section 106 Agreement;

BACKGROUND INFORMATION

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: 2168-761 Application file: 23/AP/1317 Southwark Local Development Framework and Development Plan Documents	Environmental, Neighbourhoods and Growth Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer email: patrick.cronin@southwark.gov.uk Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Recommendation (draft decision notice)
Appendix 2	Relevant planning policy
Appendix 3	Planning history of the site and nearby sites
Appendix 4	Consultation undertaken
Appendix 5	Consultation responses received
Appendix 6	Community Review Panel
Appendix 7	Section 106 heads of terms

AUDIT TRAIL

Lead Officer	Stephen Platts, Director of Planning and Growth	
Report Author	Pan Chong, Team Leader	
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Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director, Finance	No	No

Strategic Director, Environment, Neighbourhoods and Growth	No	No
Strategic Director, Housing	No	No
Date final report sent to Constitutional Team		29 November 2024