Item No. 7.3	Classification: Open	Date: 28 March 2	017	Meeting Name: Planning committee		
Report title:	Development Management planning application: Application 16/AP/3144 for: Full Planning Permission					
	Address: 87 NEWINGTON C	CAUSEWAY	, LONDON	N SE1 6BD		
	Proposal: Redevelopment of the site for a mixed use development comprising a basement/mezzanine basement, ground plus twenty-three floors to accommodate a 140 room hotel (levels 1 - 11), 48 residential units (levels 12 - 24), a retail unit (at ground floor), associated cycle parking, servicing and refuse and recycling, landscaping and private and communal residential amenity space (including at roof top level), external refurbishment to the front of the railway arches, and a new pedestrian route through the site linking Newington Causeway with Tiverton Street.					
Ward(s) or groups affected:	Chaucer					
From:	Director of Planning					
Application St	tart Date 24/08/20	16 A	Application Expiry Date 23/11/2016			
Earliest Decis	ion Date 13/10/20 ⁻	16 P	PA: 30/06	6/2017		

RECOMMENDATIONS

- 1. a) That planning permission be GRANTED subject to conditions, the applicant entering into an appropriate legal agreement, and referral to the Mayor of London.
 - b) In the event that the requirements of (a) are not met by 30 June 2017, the Director of Planning be authorised to refuse planning permission, if appropriate, for the reasons set out under paragraph 104.

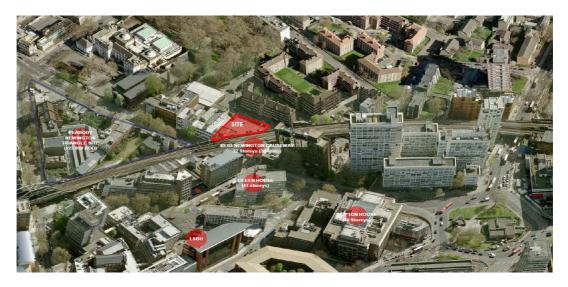
BACKGROUND INFORMATION

Site location and description

- 2. The site, measuring, 0.134 hectares, is a triangular plot bordered by Newington Causeway and Tiverton Street. It is wedged between a three storey building to the north (73 85 Newington Causeway) which hosts Southwark Playhouse, office accommodation and a railway viaduct that runs along a north west/south easterly axis.
- 3. The site is currently vacant with the previous building demolished early in 2015. The previous use of the site is understood to have been for motor vehicle repairs with some motor vehicle storage (Class B2/Class B8).



- 4. The surrounding area is characterised by a mix of uses and building types, including residential, education, office and retail uses. Nearby to the site on Gaunt Street is the Ministry of Sound night venue and night club and directly adjacent is the temporary food market known as Mercato Metropolitano.
- 5. Prevailing building heights in the area vary from 3 to 22 storeys. However, nearby schemes either recently completed, under construction, or consented will exceed these heights including: One The Elephant at 37 storeys (127m AOD), Eileen House at 41 storeys (128.7m AOD) and Skipton House (146.3m AOD). The wider area is mixed-use in character with a concentration of education and employment uses



- 6. The following land use designations apply to this site:
 - Central activities area
 - Air quality management area
 - Archaeological priority zone (Borough Bermondsey and Rivers)

- The Elephant and Castle opportunity area
- The Elephant and Castle major town centre.
- 7. The site is not in a conservation area but there are heritage assets within the wider area, including Metro Central Heights and Inner London Crown Court.

Details of proposal

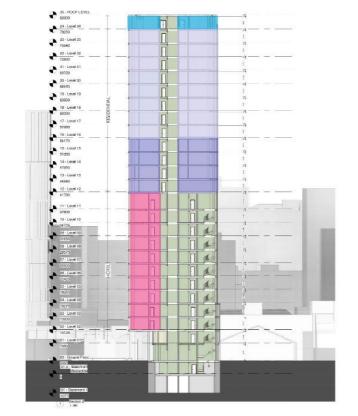
8. The development would create a 24 storey building with 2 storeys of basement, providing a retail unit, a hotel designed to accommodate 140 rooms and 48 residential flats.



unity Re

Affordable Residentia

Hotel



9. The building has the geometry of a 'kite' which extends down to level 4. From here on

it has a podium and a series of pillars. A new pedestrian route would be created along the railway viaduct creating a link between Newington Causeway and Tiverton Street. The arches along this elevation would be refurbished and brickwork repaired. New fascias would be installed to the arches.

10. Separate entrances are proposed for the hotel, retail and residential component of the scheme which would be accessed from the new public route. Servicing would take place on-site at the rear of the building from Tiverton Street.



11. Planning history

08/AP/0921 Application type: Full Planning Permission (FUL)

Erection of a part 1, part 3, part 4 and part 11 storey building providing for a mixed use development comprising a total of 44 new dwellings and 300 square metres of ground floor commercial floorspace, with associated amenity space, landscaping improvement works, secure bicycle parking and disabled car parking spaces.

Decision date 03/09/2008 Decision: Refused (REF) Appeal decision date: 26/11/2008 Appeal decision: Withdrawn (WDRN) 14/AP/4371 Application type: Prior Approval (PRAP)

Demolition of existing building

Decision date 17/12/2014 Decision: Prior Approval Required - Refused (PARR)

14/EQ/0041 Application type: Pre-Application Enquiry (ENQ)

Redevelopment of site to provide hotel and class C3 residential accommodation (follow up)

Decision date 05/11/2015 Decision: Pre-application enquiry closed (EQC)

15/EQ/0256 Application type: Pre-Application Enquiry (ENQ)

Follow up meeting - Demolition of existing building and construction of mixed-use development comprising 125 room hotel and 76 residential units, including on-site affordable units, with associated disabled parking spaces, cycle parking spaces, public open space, landscaping and servicing.

Decision date 05/11/2015 Decision: Pre-application enquiry closed (EQC)

15/EQ/0316 Application type: Pre-Application Enquiry (ENQ)

Follow up meeting - Demolition of existing building and construction of mixed-use development comprising 125 room hotel and 76 residential units, including on-site affordable units, with associated disabled parking spaces, cycle parking spaces, public open space, landscaping and servicing.

Decision date 05/01/2016 Decision: Pre-application enquiry closed (EQC)

16/AP/1022 Application type: Screening Opinion (EIA) (SCR)

Screening request for a development providing 140 hotel rooms, 48 residential units.

Decision date 29/03/2016 Decision: Screening Opinion - EIA Regs (SCR)

Planning history of adjoining/nearby sites

89-93 Newington Causeway

12. 09/AP/1940 - Demolition of existing building and erection of a 22 storey mixed use building (max building height 69.82m AOD) incorporating a 65sq.m cafe/kiosk (Use Class A3) over ground and mezzanine floors, 366sq.m of commercial floorspace (Use Class B1) from ground to second floor level, with 38 residential units above (10x 1 bed, 24x 2 bed and 4x 3 bed), 50 cycle spaces over ground/ mezzanine floors with 6 visitor cycle spaces external to the building, in addition to a basement area containing

plant and an energy centre, and two wind turbines sited at rooftop level. Granted. 16/11/2011.

103 -106 Gaunt Street (Ministry of Sound)

- 13. Change of use of part of the building from warehousing to leisure use, as an extension to the existing Ministry of Sound Night Club. Granted 22/08/1995. Application Reference: 9500538.
- 14. Permission granted for continued use as a Dance Hall. 13/01/1993. Application reference: 9101047. 13/01/1993.

Eileen House

- 15. 09/AP/0343 Demolition of existing building and erection of a 41 storey (128.7m AOD) building and separate 8 storey (35.60m AOD) building incorporating 270 private flats (16 x studio, 126 x 1-bed, 92 x 2-bed and 36 x 3-bed), 65 intermediate flats (17 x 1-bed, 44 x 2-bed and 4 x 3-bed), 4,785sq.m. of office (Use Class B1) and 287 sqm. of retail (Use Class A1-A5), together with 34 disabled car parking spaces, 44 motorcycle spaces and 411 cycle spaces within 2 basement levels, plus associated servicing facilities (4,626sq.m.) and public realm improvements including creation of a resident's garden (458sq.m.) and University Square (2,768sq.m.).
- 16. The Mayor of London granted permission 7 January 2014. Construction is well advanced. Minor amendments to this permission were agreed under planning reference 16/AP/1310 on 14/02/2017.

Skipton House, 80 London Road, Perry Library, 250 Southwark Bridge Road; and Keyworth Street Hostel, 10 Keyworth Street, London SE1

17. 15/AP/5125 - Demolition of the existing buildings and creation of basement (plus mezzanine) and the erection of buildings ranging from Ground Floor plus 7 to ground floor plus 39 stories (maximum building height of 146.3m AOD) comprising retail uses (Use Classes A1/A3/A4) and fitness space (Use Class D2) at ground floor, multifunctional cultural space (Use Classes D1/D2/Sui Generis) at basement and ground floor levels, and office use (Use Class B1) and 408 residential units (Use Class C3) on upper levels, new landscaping and public realm, a publically accessible roof garden, ancillary servicing and plant, cycle parking and associated works. Resolution to grant 12/7/2016. Pending completion of a legal agreement.

KEY ISSUES FOR CONSIDERATION

Summary of main issues

- 18. The main issues to be considered in respect of this application are:
 - a) Principle of the proposed redevelopment in terms of land use and conformity with planning policies
 - b) Affordable housing
 - c) Urban design, including layout, height and massing and open space
 - d) Impact on strategic and local views and the setting adjacent listed buildings and conservation areas

- e) Transportation and highways including cycling
- f) Housing quality
- g) Impact on the amenities of occupiers of neighbouring properties
- h) Sustainability (including energy, flood risk, site contamination and archaeological matters
- i) Planning obligations and community infrastructure levy (CIL).

Planning policy

National Planning Policy Framework (the Framework)

19. The document is applicable in its entirety, but the most relevant sections are:

Section 1: Building a strong competitive economy Section 2: Ensuring the vitality of town centres Section 4: Promoting sustainable development Section 6: Delivering a wide choice of good quality homes Section 7: Requiring good design Section 10: Meeting the challenge of climate change, flooding and coastal change.

20. The London Plan 2016

Policy 1.1 Delivering the strategic vision and objectives for London Policy 2.5 Sub-regions Policy 2.9 Inner London Policy 2.10 Central activities zone – strategic priorities Policy 2.11 Central activities zone – strategic functions Policy 2.13 Opportunity areas and intensification areas Policy 2.14 Areas for regeneration Policy 2.15 Town centres Policy 3.1 Ensuring equal life chances for all Policy 3.2 Health and addressing health inequalities Policy 3.3 Increasing housing supply Policy 3.4 Optimising housing potential Policy 3.5 Quality and design of housing developments Policy 3.6 Children and young people's play and informal recreation facilities Policy 3.7 Large residential developments Policy 3.8 Housing choice Policy 3.9 Mixed and balanced communities Policy 3.10 Definition of affordable housing Policy 3.11 Affordable housing targets Policy 3.12 Negotiating affordable housing on individual private residential and mixed use schemes Policy 3.13 Affordable housing thresholds Policy 3.14 Existing housing Policy 3.15 Coordination of housing development and investment Policy 3.16 Protection and enhancement of social infrastructure

Policy 3.17 Health and social care facilities

Policy 4.1 Developing London's economy

Policy 4.2 Offices

Policy 4.3 Mixed use development and offices

Policy 4.6 Support for enhancement of arts, culture, sport and entertainment provision

Policy 4.7 Retail and town centre development

Policy 4.8 Supporting a successful and diverse retail sector

Policy 4.9 Small shops

Policy 4.10 New and emerging economic sectors

Policy 4.11 Encouraging a connected economy

Policy 4.12 Improving opportunities for all

Policy 5.1 Climate change mitigation

Policy 5.2 Minimising carbon dioxide emissions

Policy 5.3 Sustainable design and construction

Policy 5.4A Electricity and gas supply

Policy 5.5 Decentralised energy networks

Policy 5.6 Decentralised energy in development proposals

Policy 5.7 Renewable energy

Policy 5.8 Innovative energy technologies

Policy 5.9 Overheating and cooling

Policy 5.10 Urban greening

Policy 5.11 Green roofs and development site environs

Policy 5.12 Flood risk management

Policy 5.13 Sustainable drainage

Policy 5.14 Water quality and waste water infrastructure

Policy 5.15 Water use and supplies

Policy 5.16 Waste self-sufficiency

Policy 6.1 Strategic approach

Policy 6.3 Assessing effects of development on transport capacity

Policy 6.4 Enhancing London's transport connectivity

Policy 6.5 Funding Crossrail and other strategically important transport infrastructure

Policy 6.7 Better streets and surface transport

Policy 6.9 Cycling

Policy 6.10 Walking

Policy 6.11 Smoothing traffic flow and tackling congestion

Policy 6.12 Road network capacity

Policy 6.13 Parking

Policy 7.1 Building London's neighbourhoods and communities

Policy 7.2 An inclusive environment

Policy 7.3 Designing out crime

Policy 7.4 Local character

Policy 7.5 Public realm

Policy 7.6 Architecture

Policy 7.7 Location and design of tall and large buildings

Policy 7.8 Heritage assets and archaeology

Policy 7.9 Heritage-led regeneration

Policy 7.10 World Heritage Sites

Policy 7.11 London View Management Framework

Policy 7.12 Implementing the London View Management Framework

Policy 7.14 Improving air quality

Policy 7.15 Reducing noise and enhancing soundscapes

Policy 7.18 Protecting local open space and addressing local deficiency

Policy 7.19 Biodiversity and access to nature

Policy 7.21 Trees and woodlands

Policy 8.2 Planning obligations

Policy 8.3 Community Infrastructure Levy.

21. Regional Supplementary Planning Documents (SPDs) and guidance

Providing for Children and Young People's Play and Informal Recreation (2012) Sustainable Design and Construction (2006) The Mayor's Energy Strategy (2010) The Mayor's Transport Strategy (2010) The Mayor's Economic Development Strategy (2010) The Mayor's Housing SPG (2012) Planning for Equality and Diversity in London (2007) The Mayor's Climate Change Mitigation and Energy Strategy (2011).

22. Core Strategy 2011

Strategic Policy 1 – Sustainable development Strategic Policy 2 – Sustainable transport Strategic Policy 3 - Shopping, leisure and entertainment Strategic Policy 4 – Places to learn and enjoy Strategic Policy 5 – Providing new homes Strategic Policy 6 – Homes for people on different incomes Strategic Policy 7 – Family homes Strategic Policy 10 – Jobs and Businesses Strategic Policy 11 – Open spaces and wildlife Strategic Policy 12 – Design and conservation Strategic Policy 13 – High environmental standards.

Southwark Plan 2007 (July) - saved policies

23. The council's cabinet on 19 March 2013, as required by paragraph 215 of the NPPF, considered the issue of compliance of Southwark Planning Policy with the National Planning Policy Framework. All policies and proposals were reviewed and the council satisfied itself that the policies and proposals in use were in conformity with the NPPF. The resolution was that with the exception of policy 1.8 (location of retail outside town centres) in the Southwark Plan all Southwark Plan policies are saved. Therefore due weight should be given to relevant policies in existing plans in accordance to their degree of consistency with the NPPF.

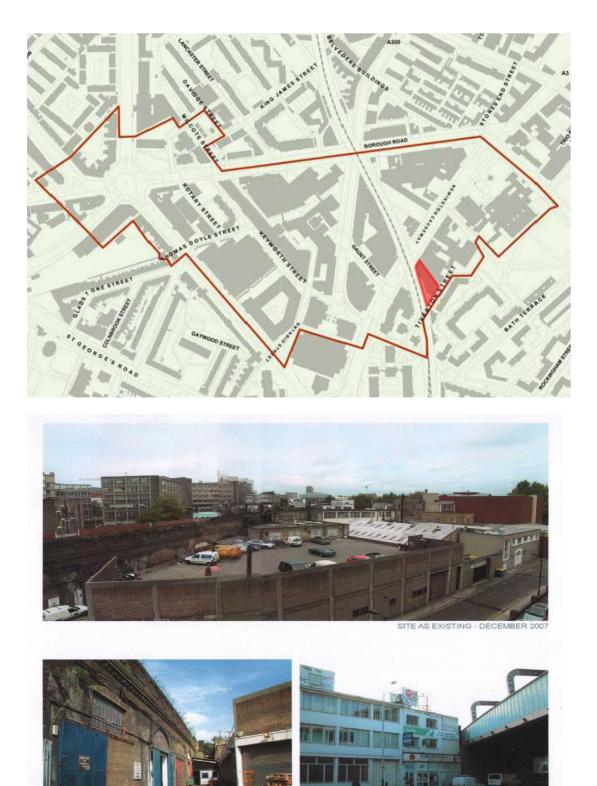
Policy 1.1 Access to employment opportunities Policy 2.5 Planning obligations Policy 3.1 Environmental effects Policy 3.2 Protection of amenity Policy 3.3 Sustainability assessment Policy 3.4 Energy efficiency Policy 3.6 Air quality Policy 3.6 Air quality Policy 3.7 Waste reduction Policy 3.9 Water Policy 3.11 Efficient use of land Policy 3.12 Quality in design Policy 3.13 Urban design Policy 3.14 Designing out crime Policy 3.18 Setting of listed buildings, conservation areas and world heritage sites Policy 3.19 Archaeology

Policy 3.20 Tall buildings

Policy 3.21 Strategic views Policy 3.22 Important local views Policy 3.28 Biodiversity Policy 4.1 Density of residential development Policy 4.2 Quality of residential accommodation Policy 4.3 Mix of dwellings Policy 4.5 Wheelchair affordable housing Policy 4.6 Loss of residential accommodation Policy 5.1 Locating developments Policy 5.2 Transport impacts Policy 5.3 Walking and cycling Policy 5.6 Car parking Policy 5.7 Parking standards for disabled and the mobility impaired Policy 5.8 Other parking.

Principle of development

- 24. In 2012 the council adopted the Elephant and Castle Supplementary Planning Document which provides guidance on how policies adopted in the Core Strategy, the London Plan and Southwark Plan should be applied in this area. The SPD area is also designated as an opportunity area which is undergoing major transformation with significant investment is housing, retail, transport infrastructure. The regeneration priorities for Elephant and Castle are:
 - A vibrant town centre, with shopping, business and hotels
 - Providing more and better homes
 - Improved social and community infrastructure
 - Better connections and an integrated public transport
 - Attractive neighbourhoods with their own character
 - Sustainable use of resources
 - Working with key stakeholders to successfully deliver the Area Action Plan.
- 25. Around 5000 new homes are expected to be built over the lifetime of the Core Strategy as well an uplift in retail space (45,000sq. m) and demand for around 2,500 hotel bed spaces. Most of this growth is expected to take place in Elephant and Castle Town Centre. 87 Newington Causeway falls within the enterprise quarter of the Elephant Castle area and is identified an opportunity site where there is potential for redevelopment, to improve pedestrian links along the railway viaduct and to provide active town centre uses along its narrow, but main site frontage. The previous employment use at this site had a public frontage but significantly did not provide publically accessible connections across the site. The building was demolished in 2015 and has remained vacant since in anticipation of redevelopment by the applicant.



26. This proposal would provide new homes, retail and a hotel uses which, in land use terms, is consistent with strategic objectives. The provision of these uses would outweigh the loss of the extant employment at this site, in accordance with saved

policy 1.4 as the scheme is likely to generate a higher yield of jobs through a more intensive use of the site and deliver an acceptable mix of town centre uses. For these reasons the principle of hotel-led redevelopment would be in accordance with strategic policy 10 (Jobs and business), 3 (Shopping, leisure and entertainment), 5 (New homes) and London Plan policies which promote housing intensification and retail growth in town centre locations (2.13, 2.15 and 3.3).

Urban design

- 27. Strategic policy 12 of the Core Strategy 'Design and conservation' states that 'Development will achieve the highest possible standards of design for buildings and public spaces to help create attractive and distinctive places which are safe, easy to get around and a pleasure to be in'. Saved policy 3.12 of the Southwark Plan asserts that developments 'should achieve a high quality of both architectural and urban design, enhancing the quality of the built environment in order to create attractive, high amenity environments people will choose to live in, work in and visit' and saved policy 3.13 requires the principles of good urban design to be taken into account in all developments. This includes height, scale and massing of buildings, consideration of the local context, its character and townscape as well as the local views and resultant streetscape.
- 28. The proposal seeks to develop a cleared site with a substantial new mixed use scheme including hotel, commercial and residential in an articulated block with a new thoroughfare connecting Newington Causeway to Tiverton Street along the railway viaduct. The site is triangular in shape with a narrow frontage on Newington Causeway broadening out to the rear of the site on Tiverton Street.
- 29. The site does not include any listed buildings and is not located in a conservation area though the proposed scale confirms that there will be an impact on the setting of a number of listed buildings and conservation areas. The nearest listed buildings include the Grade II listed Inner London Sessions Court and Metro Central Heights on Newington Causeway, the group listed Grade II buildings on Trinity Street and Trinity Square and the Grade II* listed St George the Martyr on Borough High Street. Further afield are the group listed Duke of Clarence Public House and numbers 123 131 London Road, which are located in the St George's Circus Conservation area which is centred on the Grade II* listed obelisk.
- 30. There are no undesignated heritage assets affected by the development. The spaces on either side of the viaduct have been highlighted in the draft New Southwark Plan as the 'Low-Line' a series of linked spaces and thoroughfares that hug the viaduct and introduce a broad range of uses in the arches.
- 31. The development is designed in two parts; a base (podium) taking up the first four floors of the development, and a lozenge-shaped tower which adds 20 storeys on top of the podium. The tower is aligned east-west and presents a narrow edge toward Newington Causeway and Tiverton Street which limits its impact on these streets. In contrast the most visible approaches are from the north and south from which the flank of the tower is most visible.
- 32. The podium takes up most of the site but sets back on the eastern edge of the site to create a new route through from Tiverton Street to Newington Causeway. In addition, the podium is set back further on Tiverton Street to create a new public space at the

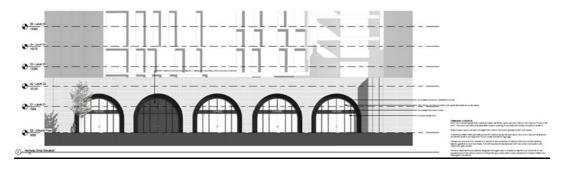
base of the tower and a forecourt to the hotel which takes up the lower portion of the development.

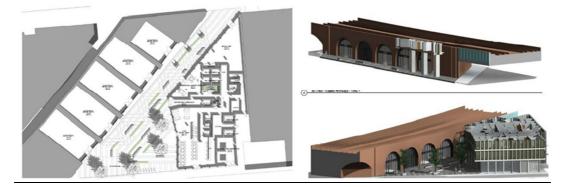
Tall building

- 33. The proposal, at 82.3 metres, is a tall building. For this reason, the proposal needs to be considered in accordance with saved policy 3.20 which states that any building over 30 metres tall (or 25 metres in the Thames Policy Area) should:
 - 1. Make a positive contribution to the landscape
 - 2. Be located at a point of landmark significance
 - 3. Be of the highest architectural standard
 - 4. Relate well to its surroundings, particularly at street level, and
 - 5. Contribute positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views.

1. Make a positive contribution to the landscape

- 34. Landscape and the public realm is an important part of any proposal for a tall building. It will not only create a setting for the tower, allowing it to 'land' appropriately but also an opportunity for such a development to demonstrate the benefits that can flow from reaching vertically to free up more space at grade in a congested part of the city such as this. This part of Southwark is characterised by busy arterial routes overlaid with important pedestrian thoroughfares.
- 35. The landscape proposals have been developed together with the architectural proposals and are an integral aspect of this scheme. From the outset the focus on landscape has been to maximise the public realm accessible on the street and the creation of new public realm.
- 36. The proposal includes a public space on Tiverton Street, immediately adjacent to the railway viaduct, and proposes a new a 6m wide public route along the eastern edge of the viaduct which links Tiverton Street to Newington Causeway. This new route is an important public gesture on the part of the development and has the potential to improve the permeability of the area significantly.





37. The landscape proposals are limited in detail at this stage. The quality of this space will rely to a large degree on the potential animation of the railway viaduct and the quality of the finishes and planting in this new route and public space. If the council is minded to support this proposal the detailed design of the landscape should be reserved by condition and the animation of the railway viaduct with well-designed new shop fronts installed in the archways which will be secured by a planning obligation.

2. Be located at a point of landmark significance

- 38. The Elephant and Castle SPD includes additional design guidance in respect of tall buildings and requires developments to help transform the public realm in the opportunity area by ensuring that they step up to the 'core' of the town centre, especially at key 'gateway' locations. Sites immediately adjacent to the viaducts at Newington Causeway, New Kent Road and Walworth Road are all defined as 'gateway' locations to the opportunity area and appropriate for tall buildings.
- 39. The proposed maximum height is set at 82.3m which in this location compares appropriately with the approximately 70m height of the adjacent 89 Newington Causeway consented in 2011. In this location the proposed height, when considered in the context of the significantly taller consented proposals in the area, Eileen House and Skipton House (both consented at around 140m in height), the proposed building will appear as a mid-height tower in a well established cluster and is considered appropriate.

3. Be of the highest architectural standard

40. Buildings of this stature have to demonstrate their contribution to the appearance of the wider area. The highest architectural standard is called for and requires an elegance of proportion, innovation in design and a demonstrable exceptional quality of accommodation.



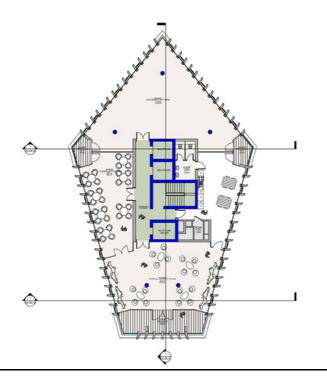
- 41. Whilst the siting of a tower in this location is not questioned, officers have considered all aspects of the design in detail to ensure that it is exceptional in its quality.
- 42. In order to assess the design of the tower in the London skyline a series of strategic and local views have been scoped and agreed with officers. These have been included in the application. The significant scale of the proposed bulk and massing especially the flank views from the north and south potentially introduces substantial incursions into the views from the sensitive settings of conservation areas and listed buildings.
- 43. Local views have been prepared as Accurate Visual Representations to demonstrate the contribution that this development will make to the local street scene and the wider London skyline. Officers have reviewed these and consider that the height, bulk and massing is appropriate, the lozenge-shaped footprint of the tall building reduces the apparent scale of the tower when viewed from the north and south and the views demonstrate that the building does not affect the setting of the Trinity Church conservation area nor the statutory protected settings of the Inner London Court and St George the Martyr. Officers are satisfied that the sculpted profile of the building coupled with its considered height is appropriate in this context and is not harmful.

Materiality

- 44. The proposed design seeks a uniform approach to all the parts of the development and uses mainly a glazed terracotta ribbed design to form the cladding of the tower. The façade is articulated with a series of large vertical fins which start off perpendicular to the façade and are subtly angled to direct the views of occupants away from neighbouring sites and avoid overlooking onto adjacent sites. This gives the tower a simple and uncluttered appearance with a strong vertical emphasis.
- 45. Starting at the podium base, a glazed terracotta filigree has been added between the vertical fins to give some screening to the hotel windows. Higher up and in the tower the glazed terracotta filigree infills are arranged in a chequer-board pattern where they act as sun-screening. These infill panels are placed in front of the plane of the windows and are proposed to be glazed in a range of green and yellow hues to give the tower added visual interest and a layered appearance.
- 46. The quality of the design will rely to a large degree on the quality of materials and the

architectural detailing which is proposed to be reserved by condition. In particular given the size of the tower, a full scale mock-up of a typical structural bay will be required to demonstrate the quality of proposed materials, the depth of the façade including the fins and screens, and the quality of the proposed construction.

47. The top of the tower is an important feature of the building. It should to be distinctive and recessive. At the top, the crown of the tower is designed as a triple-order feature which distinguishes it from the main body of the tower. The top floor is devoted to shared communal facilities for residents and includes an outdoor terrace and communal spaces. Here the vertical fins are designed to return over the top of the building with glass in-fills and give the crown a framed appearance.



4. Relates well to its surroundings, particularly at street level

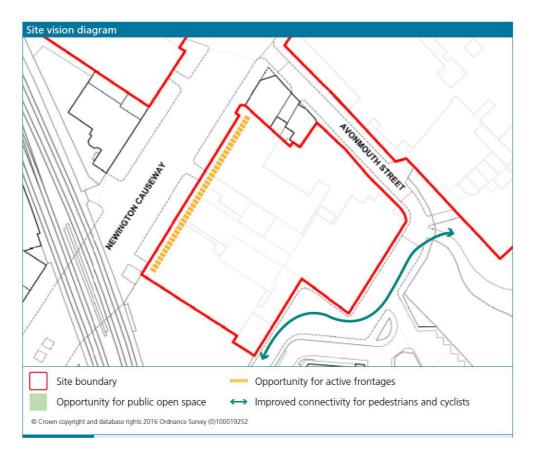
- 48. The proposal has taken great care to activate its two main street frontages; one along the viaduct and the other on Tiverton Street. These are designed to include retail space, the main entrance and reception areas to the residential tower and the main lobby/reception area of the hotel. Access for servicing is limited to single bay on Tiverton Street and the remainder of the ground floor is devoted to active uses which engage well with the adjacent public realm.
- 49. The hotel lobby/reception area looks out onto the new public space on Tiverton Street. The main entrance/reception areas for the residential towers are accessed from the newly created route along the viaduct, and the narrow Newington Causeway end of the site is entirely devoted to a retail unit.

5. Contributes positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views

- 50. The council has received a complete set of views strategic and local. These views demonstrate how the proposal will appear in the wider context, individually and cumulatively taking into consideration the consented an implemented schemes in the area. The site is not located in a protected Vista as defined by the LVMF (2015) and so it would not impact on protected views for strategic landmarks of importance. All the submitted views indicate that the proposed development will contribute positively to the cluster of tall buildings in the Elephant and Castle opportunity area, consistent with the requirements of the SPD. In particular, the scheme avoids causing any harm to heritage assets or their settings.
- 51. Finally, the Southwark DRP reviewed this proposal on two occasions most recently in December 2015. The DRP concluded that this proposal addressed a number of the issues they raised at the earlier review and but remained concerned about the extent and quality of the public realm which was interrupted by a deep well at the time of the review; the extent of active uses on the ground floor which, at the time included hotel rooms; the cladding details and the deliverability of the project in such close proximity with the railway viaduct.
- 52. The scheme has been revised since it was presented to the DRP to address each point. The public realm has been consolidated and the deep well removed. The active uses have been located on the ground floor in response to the public realm. Lastly, technical details of the proposed terracotta cladding and in-fill panels as well as the design of the base and the crown of the building have been submitted with the application to embed the quality of design and satisfy officers that the design is deliverable. Most importantly, the panel felt they could not object to the proposed height given the precedent set by the permitted and implemented schemes in the area. Officers are satisfied, taking into account the most recent amendments to address the concerns of the panel that the scheme is of exceptional quality of design and accords with the council's urban design and heritage policies.

New Southwark Plan area visions and site allocations document

53. The adjoining site to the north of the application site has been identified for redevelopment as part of the council's New Southwark Plan area visions and site allocations document under site allocation NSP43. The proposed site allocation applies to 63 - 85 Newington Causeway which is the majority of the remaining properties within this block, encompassing several buildings which are occupied by a mix of employment, residential, health and cultural uses including the Southwark Playhouse. The owner of the adjacent site (73 - 85 Newington Causeway) submitted comments explaining that they had instructed a professional team to review this proposal and wished to reserve their right to submit formal representations following their proposed meetings with the owner of this proposal and their assessment of its impact on the development potential of their site.



- 54. The vision for 63 85 Newington Causeway is for redevelopment to re-provide at least the current amount of employment space, active frontages and retention of the theatre or an alternative culture use. Those uses are required and development could incorporate other ancillary land uses including new homes and visitor accommodation which is consistent with aspirations for the wider Elephant and Castle town centre. Public consultation is currently underway on the document which may need to be subject to a further round of consultation a part of the plan preparation process.
- 55. Officers have reviewed the site allocation which specifies land uses but does not provide guidance on scale and massing. Limited weight can be given to the consultation document but careful consideration has been given to assess the potential impact of this scheme taking into account the relevant material policy considerations. The key consideration in these circumstances is saved policy 3.11 (efficient use of land) which states that all development should ensure that proposals do not unreasonably compromise the development potential of, or potential legitimate activities on, neighbouring sites and this policy has been used as a benchmark to assess the potential effects of this development.
- 56. The scheme has been designed to have a party wall where it adjoins 85 Newington Causeway, avoiding the provision of windows and openings on the boundary. At upper levels the tower is set back from the site boundary and orientated at an angle to minimise the potential for direct overlooking. Coupled with the proposed fin arrangement on its external elevation, the scheme has been sensitively designed so as not to inhibit redevelopment of the adjoining site.

57. Turning to the site allocation, its site area (4Ha) and regular shape provides significant potential for a range of configurations and is much less constrained than the application site which is wedge shaped and bounded by the railway viaduct, existing buildings and its narrow frontage. On the balance of probabilities there is a realistic prospect that redevelopment of this site at a scale sensitive to the local context could reasonably take place alongside the scheme under consideration. The design of the building would positively support redevelopment at an appropriate scale given the relative lack of constraints when compared to the application site. On balance, officers are satisfied that the proposed scheme would not unreasonably compromise the objectives of the site allocations document or the wider objectives for the wider Elephant and Castle area. In the absence of substantive objections or evidence to the contrary officers are satisfied that the proposal at 87 Newington Causeway could take place without compromising the existing function of the adjoining site or the deliverability of a future scheme based on proposed site allocation. For these reasons the design of the scheme is acceptable and should enable redevelopment proposals to come forward for the adjoining site.

Overall design conclusions

58. Overall the proposed arrangement and siting of the building is consistent with the strategic policy objectives as it would create a pedestrianised route along the viaduct improving permeability with the wider area and enabling the delivery of the 'low line' route at this part of Southwark. The proposed building, at 82.9 metres, is a tall building that will appear as a mid-height tower in a well-established cluster that would be appropriate and would not harm the setting of nearby heritage assets. Officers are satisfied that the design of the building is well considered, highly articulated with high quality materials and a simple elegant form that will sit well within the context of other tall buildings in the area. The proposal has been considered in the wider and local views, with careful consideration given to the materiality of the design as it comes down to the ground and it is considered that the scheme, with its finned design and deep-set masonry facade will complement the area of Newington Causeway and Tiverton Street. Officers are satisfied that, in terms of urban design the scheme would support strategic objectives and would not unreasonably compromise the development of nearby sites in accordance with the development plan. Notwithstanding this, it is recommended that mock up bay within the tower and podium block including samples of external materials, detailed section drawings are secured by condition or planning obligation as well as the delivery of works to the arches along the low line between Newington Causeway and Tiverton Street.

Housing provision

59. The Elephant and Castle opportunity area has a minimum target of 5000 new homes to be delivered of which at least of which at least 1400 will be affordable. The proposal to deliver 48 new homes as part of this scheme will contribute towards this strategic target which is supported.

Table 1: Schedule of accommodation

		Affordable	Private Market	Total	%
One bed	units:	7	12	19	39.58
	habitable	21	36	57	-
	rooms:				
Two bed	units:	6	16	22	45.83
	habitable	20	56	76	
	rooms:				
Three bed	units:	3	4	7	14.58
	habitable rooms:	15	20	35	-
Total	units:	16	32	48	100
	habitable	56	112	168	-
	rooms:				
%	units:	33%	67%	-	-
	habitable rooms:	33%	67%	-	-

Affordable housing

- 60. Strategic policy 6 requires major developments to provide a minimum of 35% affordable housing and a broader minimum of 1400 affordable homes is expected to be delivered in the Elephant and Castle area. A 50:50 tenure split between social rented and intermediate housing is expected in this area and a minimum of 35% private housing. London Plan policy 3.12 seeks new development to secure the maximum reasonable amount of affordable housing is provided.
- 61. This scheme proposes 33% of the new homes as affordable dwellings when measured by habitable rooms which would contribute towards the affordable dwelling target in this area. The proposed quantum of affordable housing is policy compliant when taking account the dispensations permitted under policy 4.5, which allows one less affordable habitable room to be provided for every affordable wheelchair unit proposed. Four affordable wheelchair units are proposed which, based on a target of 59 habitable rooms, means the 56 habitable rooms proposed is policy compliant and an acceptable level of on-site affordable housing.

Proposed affordable housing	Habitable rooms
Total habitable rooms	168
35% affordable requirement	59
Wheelchair dispensation	4
Policy compliant habitable room requirement reflecting wheelchair discount	55
Proposed level of on-site affordable housing	56

Overview of wheelchair dispensation

62. The tenure of affordable housing proposed is split 50:50 between social rent and intermediate housing and of the remaining dwellings at least 35% of the new units would be for private market sale in accordance with strategic policy 6. Overall the proposed amount and tenure of housing is acceptable and its delivery will be secured by legal agreement.

Dwelling mix

63. Strategic policy 7 of the Core Strategy requires a mix of dwellings to be provided across all tenures requiring at least 10% of dwellings to have 3 or more rooms and 60% to have 2 or more bedrooms.

	Units	%
One bedroom	19	39.58
Two bedroom	22	45.83
Three bedroom	7	14.58
Total	48	100

 Table 2: Dwelling mix

- 64. A mix of 1, 2, and 3 bedroom homes are proposed across all tenures providing housing choice for future occupiers. At least 10% of the new homes are proposed as having 3 or more dwellings and at least 60% would have 2 or more dwellings which complies with the dwelling mix objectives for Elephant and Castle opportunity area.
- 65. Saved policy 4.3 of the Southwark plan requires 10% of new developments to provide living accommodation that is suitable for wheelchair users. The table below sets out the proposed schedule of wheelchair units and tenure across the scheme.

Table 3: Proposed schedule of wheelchair accommodation

			Affordable	Private market	Total
One bed		units:	0	1	1
Two bed		units:	3	0	3
Three bed		units:	1	0	1
	Total	units:	4	1	5
		% of total units (48)	-	-	10.4

66. At least 10% of the proposed units have been designed for wheelchair users and a range unit sizes has been provided. Overall the proposed dwelling mix is policy

compliant and should be supported.

Density and quality of accommodation

- 67. Core Strategy policy 5 sets out the expected density range for new development across the borough. Within this part of Elephant and Castle a density falling within the range of 650 1,100 habitable rooms per hectare (hrh) is expected and normally indicative of an appropriate intensity of development. At 2,666 habitable rooms per hectare the proposed density falls outside the normal density range expected in this area which is typically the result of proposals for tall buildings. The density proposed is comparable to other consented tall buildings in the area such as Eileen House and Skipton House. Notwithstanding this, in accordance with the strategic policy 5 maximum densities may be exceeded where developments are of an exemplary standard of design.
- 68. The adopted residential design standards SPD set criteria that should be met to demonstrate an exemplary standard of design. An assessment of the scheme's performance against this criteria is set out below:

SPD criteria	Officer remarks
Significantly exceed minimum floorspace standards	All of the proposed units are a least 10% larger than minimum standards.
Provide for bulk storage	An appropriate level of storage space has been provided in each of the residential units.
Include a predominance of dual aspect units	All units in the development are at least dual aspect providing good aspect and outlook for future occupiers
Exceed the minimum ceiling height of 2.3 metres required by the building regulations	Proposed floor to ceiling heights will be a minimum of 2.5 metres.
Have natural light and ventilation in kitchens and bathrooms	All kitchens have natural light and ventilation. A number of the bathrooms are enclosed which needs to be balanced against the other quality aspirations delivered by the scheme.
Exceed amenity space standards	Each dwelling has access to usable private amenity space in the form of winter gardens. Where less than 10 sq metres has been provided, the shortfall has been incorporated into a communal residents rooms and outdoor amenity space at level 24. The level of space provided at this level (297 sq. m) significantly exceeds the amount required by policy (197 sq. m).

Meet good sunlight and daylight standards	All residential rooms at lower levels have been tested and would achieve a good standard of daylight and sunlight in accordance with BRE criteria.
Have excellent accessibility within dwellings including meeting approve document M of the Building Regulations M4 (2) standard for all non-wheelchair user homes	All units have been designed to be built to at least M4 (2) standard and all the affordable wheelchair units will be built to M4 (3) in accordance with the residential design guidance and London Plan policy 3.8.
Minimise corridor lengths by having an increased number of cores	There are no more than 5 flats per floor which is well below the maximum of 8 recommended in residential design guidance.
Minimise noise nuisance in flatted developments by stacking floors so that bedrooms are above bedrooms, lounges are above lounges etc.	The approach to layout is typically bedrooms above bedrooms and living rooms above living rooms. The number of instances where this is not the case is limited and not anticipated to result in inferior living accommodation should appropriate conditions be applied to safeguard appropriate insulation and internal noise standards.
Obtain 'Secured by Design' certification	The applicant is proposing to achieve 'Secured by Design' accreditation.
Have exceptional environmental performance that exceeds the standards set out in the sustainable design and construction SPD	The building will achieve 43.3% improvement over Part L 2013 which would exceed the 35% target required by London Plan policy.
Maximise the potential of the site	The potential of the site has been maximised by virtue of the form and massing of the building relative to its footprint.
Make a positive contribution to the local context, character and communities, including contributing to the streetscape.	The building would relate well to its local context, complement the cluster of buildings emerging at Elephant and Castle and would create a publically accessible route along the viaduct, creating new active frontages and a public space.

69. The summary above shows that this scheme successfully meets the majority of criteria demonstrating the quality of accommodation proposed would be of a high standard. The scheme is also proposing a communal room for residents at the top of the building (level 24) that will be available to all residents. The space includes kitchen

facilities and could host private and communal functions and would benefit from panoramic views of London. The design of the space lends itself well for a range of social functions and in the context of this proposal considered to be an exemplary addition for the benefit of residents of this building.

Child play-space

- 70. The Mayor's SPG 'Providing for children and young people's play and informal recreation' (2008) recommends a standard of 10sqm per child, regardless of age to be provided within major new developments. Based on GLA toolkit this scheme would generate a child yield of 12 which equates to the need to provide around 120 sq.m of play space for a range of children across all ages. Approximately half of this is required to be provided as door step play (children under 5) with the remainder allocated for children older than 5 years.
- 71. Child play-space (113 sq. m) is proposed at level 24 that would sit alongside the proposed residents' room. Little detail has been provided on the type of play facilities that would be provided within this space but officers are satisfied that these details could be secured by condition or planning obligation to ensure it is well designed and would meet a range of needs. Whilst play-space is not typically provided at upper levels of tall buildings, officers are satisfied that provision of play amongst the communal facilities at roof area, if successful could support social interaction and community relations within the development. For this reason, the approach to on-site play-space is, on balance, considered reasonable if one considers that opportunities to maximise play-space have been achieved. Notwithstanding this, an obligation is recommended that would require a financial contribution to be provided towards the improvement of nearby facilities at Newington Gardens in the event the design of facilities proposed is not considered adequate to meet the full range of needs for child play from this development.

Pollution

72. The dominant pollution sources that could affect future occupiers of the development are noise and emissions generated from the flow of vehicles on Newington Causeway and the railway viaduct. The site is also influenced by commercial activity at the adjoining site on Newington Causeway and the proposed CHP plant. It is recommended that mitigation measures are secured by condition to ensure future occupiers have good internal living conditions in terms of air quality and internal noise environment. Mechanical ventilation will be required and its design and function should be secured by condition to ensure it is fit for purpose and respects the appearance of the building.

Viability

73. A financial appraisal was submitted with the application which has been independently assessed by a specialist assessor. The assessment concludes that the scheme can viably deliver a policy compliant level of affordable housing as proposed and should be supported.

Housing summary

74. The proposed scheme would deliver a policy compliant mix of new homes, across a

range of affordable and private market sale tenures, all of which would exceed minimum floor space requirements, be dual aspect and have access to private and communal amenity space, including a communal resident rooms. Overall the quality of accommodation is of a high standard and taking account viability considerations, officers are satisfied that the policy compliant tenure mix can be delivered on-site. This has been a key material consideration when assessing the acceptability of the residential component and officers are satisfied it will positively contribute towards to objectives of the development plan.

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

- 75. Policy 3.2 'Impact on amenity' of the Southwark Plan states that planning permission for development will not be granted where it would cause a loss of amenity, including disturbance from noise, to present and future occupiers in the surrounding area or on the application site. Furthermore, there is a requirement in policy 3.1 'Environmental effects' to ensure that development proposals will not cause material adverse effects on the environment and quality of life. Strategic policy 13 'High environmental standards' of the Core Strategy requires developments to avoid amenity and environmental problems that affect how we enjoy the environment in which we live and work.
- 76. A development of this scale clearly has the potential to impact on the environment and the quality of life for neighbouring occupiers during construction and the completed development. There are a number of properties nearby which have been closely examined for a range of potential impacts, the most sensitive of which are identified within this part of the report.

Daylight and sunlight

- 77. A daylight, sunlight and overshadowing analysis was submitted with the proposal to assess the impact of the scheme on nearby residential properties. The assessment was carried out in accordance with the Building Research Establishment (BRE) 2011 guidelines as specified in adopted residential guidance. The main properties assessed were:
 - Metro Central Heights
 - Stephenson House
 - Telford House
 - 28 Avonmouth Street
 - 89-93 Newington Causeway.
- 78. The BRE guidelines state that the guide is intended for building designers and the clients, consultants and planning officials. The advice given here is not mandatory and the document should not be seen as an instrument of planning policy. Its aim is to help rather than constrain the developer. Although it gives numerical guidelines, these should be interpreted flexibly because natural daylighting is only one of many factors in the site layout design.

Assessment of daylight and sunlight impacts

79. Three tests were applied to assess the impacts at these properties. These were vertical sky component (VSC), a no sky line (NSL) assessment and annual probable sunshine hours (APSH). An overview of the tests and their relevance is set out in the table below:

Test	Target	Description
Vertical sky component (VSC)	Less than 0.8 reduction in VSC	This assessment measures light at single point on a window. The British Research Establishment advises that windows of neighbouring properties should achieve a VSC of at least 27%, and notes that if the VSC is reduced to no less than 0.8 times its former value (i.e. 20% reduction) following the construction of a development, then the reduction will not be noticeable.
No sky line (NSL)	Less than 0.8 reduction in NSL	This assessment estimates the distribution of light within a room taking account the area of a room at desk height that can see the sky. The BRE guidance suggests that the NSL should not be reduced to less than 0.8 times its former value (i.e. a 20% reduction).
Annual probable sunshine hours	Retain >25% of Total APSH or at least 0.8% of 'Pre- Development Value'	This test estimates the availability of sunlight. The BRE guidelines state that if 'post-development' the available sunlight hours are both less than the 25% of the total and less than 0.8 times the 'pre- development' value, either over the whole year or just within the winter months, then the occupants of the existing building will notice the loss of sunlight.

80. A summary of the assessment is set out below:

Table 4: Summary of daylight assessment

Property	Total No. of Rooms Assess ed	Meets NSL or VSC Criteri a	Total Experi encing 20-30% Reduct ions	Total Experienc ing 30- 40% Reduction s	Total Experiencing >40% Reductions
Telford House	65	47	4	10	4
Stephenson House	180	180	0	0	0
Metro Central Heights	69	69	0	0	0

28 Avonmouth Street	15	12	3	0	0
89 - 93 Newington Causeway	15	15	0	0	0
Total	344	323 (94%)	7 (2%)	10 (3%)	4 (1%)

Table 5: Summary of sunlight assessment

Property	Total No. of Rooms Assessed	Total Retaining >25% Total APSH or at least 0.8% of 'Pre- Development Value'	Total Retaining <25% Total APSH or up to 0.8% of 'Pre-Development Value'
Telford House	65	65	0
Stephenson House	180	180	0
Metro Central Heights	69	69	0
28 Avonmouth Street	15	15	0

81. The assessment shows that the majority of habitable rooms affected by this proposal will not experience a noticeable change in either daylight or sunlight. There are, however, a number of properties where the proposed change would be noticeable and these impacts are discussed in further detail in the paragraphs below.

Telford House

- 82. This is a four storey linear housing block. The property is residential on all floors with deck access on its Tiverton Street. Its frontage is principally composed of front doors to dwellings and windows to rooms that principally are understood to be mainly bathrooms and kitchens. A total of 65 windows were assessed each serving an individual room.
- 83. The majority of rooms facing on to the application site are understood to be bathrooms and kitchens of a size generally no bigger than 7 sq. metres. By virtue of their size, those kitchens are not considered to be large enough to be treated as habitable rooms.

- 84. Taking into account research on flat layouts at the Telford House the worst affected rooms are all likely to be bedrooms as the main living areas face onto the green area to the rear of Telford House. For this reason the noticeable impacts identified at these properties are focused on bedrooms and not the main living areas. All rooms would continue to receive an acceptable standard of daylight.
- 85. In these circumstances, and when weighed against the benefits of bringing this brownfield site into productive use, it is considered that the harm caused is not so severe as to warrant refusal of an otherwise acceptable scheme.

Noise

86. The proposed hotel use is likely to be a 24 hour operation with plant, mechanical ventilation and servicing. Conditions requiring the submission of details are recommended to ensure noise generating plant is appropriate insulated to ensure an acceptable standard of amenity is maintained at neighbouring properties. This may include restrictions on the times of deliveries and hours at which the building is serviced.

Privacy and overlooking

87. The distance of separation between the proposed scheme and nearby residential dwellings is in excess of minimum distances prescribed in the adopted residential guidance. For these reasons it is not anticipated that this development will materially harm the amenity of residential occupiers near to the development.

Demolition and construction impacts

88. The proposed scheme will involve construction activities which have the potential to impact on residential occupiers nearby. A condition requiring the submission of a construction management plan is recommended that would cover all phases of the development to ensure the environmental effects of construction are minimised and appropriate consideration is given to safeguard the amenity neighbouring properties and land uses.

Transport issues

- 89. Saved policy 5.1 seeks to ensure that development is located near transport nodes or, where they are not, it must be demonstrated that sustainable transport options are available to site users and sustainable transport is promoted.
- 90. The site is highly accessible by public transport owing to it being close to the Elephant and Castle underground station which is served by the Bakerloo Line and Northern Line, Elephant and Castle National Rail station which is served by Thameslink Services and South Eastern Services and 30 bus services. Trip generation data submitted as part of the submission forecasts that the majority of trips generated by this development will be made by foot and public transport which is to be expected for such a centrally located car free site close to public transport. Taxi journeys and servicing trips will be generated by the hotel use and retail use but these trips are considered to be of a scale that could be adequately accommodated by this site. Overall, the location is acceptable for this scale of development and conveniently located to support sustainable travel choices by future occupiers.

Car parking

- 91. The Elephant and Castle SPD states that all development in the central activities zone (CAZ) should be car-free, aside from provision that is made for disabled persons and for car clubs. Saved policy 5.6 of the Southwark Plan states that justification for the amount of car parking sought should take into account the accessibility of the site using public transport, the impact on overspill car parking and the demand for parking within controlled parking zones.
- 92. No car parking is proposed as part of this development which is considered appropriate given the site's accessibility using public transport. It is recommended that future residential and commercial occupiers are prevented from being eligible to apply for parking permits to reduce reliance on the private car and to minimise the potential for additional vehicles parking nearby within the controlled parking zone. This will be secured by legal agreement or a condition.

Cycle parking

93. The London Plan requires 1 long term space per 1 bed unit, 2 spaces for all other dwellings plus 1 short stay per 40 units, which exceeds the level required in the adopted Southwark plan. For hotels the expectation is for 1 long stay space per 20 rooms and 1 short stay space per 50 rooms. For retail 1 space per 175 sq. above a minimum threshold of 100 sq. metres is recommended. This generates a total requirement of 89 cycle spaces for this development. Provision for 92 secure cycle parking spaces is proposed at basement level with separate cycle stores for residents and hotel guests and a further 12 visitor spaces are proposed at ground floor level for visitors to the hotel, residential units and retail unit. Access to the secure internal stores is via a lift with alternative access also available via a stairwell. The amount of cycle parking is weather proof, secure and generally considered to be convenient given the constraints of the site. Subject to the provision of power assisted doors it is considered the proposed cycle store solution is acceptable and would be in accordance with policy aspirations for on-site cycle parking.

Servicing and waste

94. Servicing would take place from the rear of the new building from a loading bay that will be provided on Tiverton Street by the applicant. The bay is conveniently located close to an external bin collection area ensuring ease of access for refuse operators. Refuse stored in the basement would be brought to the street level on the day of collection before being transported back down to the basement. Internally bin stores are accessible by a service lift. The amount of refuse space provided is of an order that can adequately meet the needs of the development; however, it is recognised that it is likely a managed solution will be needed to ensure bins are brought to street level on collection days and are not stored there other than on those days. Details of the management of this function for all proposed uses within the building should be secured by condition or legal agreement.

Impact on trees

95. A number of trees are proposed that would be provided within the landscaped are of public realm. A condition requiring details of the proposed planting and landscaping is

recommended. There are no existing trees on or nearby the site that are likely to be affected by the development.

Sustainable development implications

Energy

- 96. London Plan Policy 5.2 states that development proposals should make the fullest contribution to minimising carbon dioxide emissions. For residential buildings an improvement on Part L (2013) Building Regulations of 100% is expected where applications are submitted before 30 September 2016. A target of 35% is required for proposals before this threshold. The latter target is the relevant policy consideration for this scheme.
- 97. An energy strategy was submitted which cites the proposal to install thermally led gas powered combined heat and power (CHP) to serve all uses within the building. Passive solar fins are incorporated onto the external façade together with low solar transmission curtain walling system which has reduced the need for active cooling, a key consideration given the number of south facing dwellings and hotel rooms. Based on this approach a carbon reduction of 186 tonnes of CO₂ per year in regulated emissions is estimated which is equivalent to an overall saving of 43.3% above the building regulations target (2013). This exceeds the 35% target and demonstrates a high standard of design and energy efficiency in accordance with London Plan policy 5.2.

Wind effects

98. An assessment has undertaken by Wintech Limited which concludes that wind conditions within and around the proposed site will be of an acceptable standard for use by pedestrians throughout the year. Mitigation is recommended for the entrances to residential accommodation which shall be secured by condition or legal agreement.

Archaeology

99. The site lies within the Borough, Bermondsey and Rivers archaeological priority zone (APZ) which is the largest archaeological priority zone in the borough. An archaeological evaluation report was submitted to the council and site visit carried out by officers. There is no evidence of any remains of archaeological significance that would be affected by this proposal.

Land contamination

100. The potential for ground contamination to be present has been assessed and full intrusive surveys are recommended to assess the actual nature, presence and extent of contamination in order to establish the risk to future occupiers. Conditions are recommended to secure appropriate details and appropriate remediation.

Flood risk

101. The site is within flood zone 3 which is considered to be high risk. Notwithstanding this, the design of the building and location of uses is appropriate as hotel accommodation and residential dwellings are located above ground level.

Notwithstanding this, conditions are recommended to ensure construction activity such as piling, and the design of foundations would not pose a pollution risk to ground water which is typical for new development in this part of Elephant and Castle.

Community infrastructure levy

102. Section 143 of the Localism Act states that any financial contribution received as community infrastructure levy (CIL) is a material 'local financial consideration' in planning decisions. The requirement for payment of the Mayoral or Southwark CIL is therefore a material consideration. However, the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport investments in London as a whole, primarily Crossrail. While Southwark's CIL will provide for infrastructure that supports growth in Southwark. In this instance it is estimated that a Mayoral CIL payment and a Southwark CIL payment would be payable in the event planning permission is granted.

Planning obligations (section 106 undertaking or agreement)

103. Saved policy 2.5 of the Southwark Plan states that planning obligations can be secured to overcome the negative aspects of a generally acceptable proposal and in accordance with NPPF obligations are required 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. After detailed evaluation of this proposal, the following table sets out the required site specific mitigation required and the applicants position regarding each point.

Planning obligation	Mitigation	Applicant position
Affordable housing	The forty eight (16) affordable dwellings to be provided (7x 1 bed; 6×2 bed; 3×3 amounting to 56 habitable rooms to include the social rented units and the Intermediate tenure. Standard review mechanism and deferred affordable housing scheme is proposed.	Agreed
Employment during construction	This development would be expected to deliver 25 sustained jobs to unemployed Southwark residents, 25 short courses, and take on 6 construction industry apprentices during the construction phase, or meet the employment and training contribution. An employment, skills and business support plan will be secured that will set out how this will be achieved, targets for construction skills and employment outputs, including apprenticeships.	
Child play equipment	Details of on-site play area to be submitted for approval. A financial contribution of £151 per square metre (indexed) towards play-space for children where required level and quality is not delivered on-site.	ТВС

Residents room	Provide the communal facilities at level 24 as for the benefit of all residential occupiers of the building. Details of the management and any reasonable costs associated with use of this space to be submitted and approved by the local planning authority. In the unlikely event of sub-division a clause is recommended that will ensure an appropriate payment is required to off-set affordable housing, play-space and communal space.	
Public realm	Landscaping improvements as described in design and access statement including improvement works to railway viaduct and retail frontage.	
Transport for London	Funding for cycle hire membership for residents and staff should be provided for a period of at least five years and there shall be consideration given to a taxi rank and funding for upgraded 'Legible London' signage.	Discussion with TfL. To
Transport site specific	Repave the footway fronting the development on Tiverton Street including new kerbing using materials in accordance with Southwark's streetscape design manual (granite natural stone paving slabs and granite kerbs). Resurfacing/reconstruction of Tiverton Street carriageway from its junction with Newington Causeway and reinstall road marking. To achieve a minimum public footway width of 2.4m on Tiverton Street, the highway authority will adopt a strip of land (between the public highway and the proposed building line around the proposed loading bay which currently does not form part of the public highway as publicly maintained. Delivery of a loading bay on Tiverton Street in accordance with the highway authority specification.	
Car parking	Residents to be exempt from applying for parking permits by legal agreement or condition.	Agreed
Car Club	Provision of 3 years membership for each eligible resident.	Agreed

Administration	To be finalised.	Agreed
charge (2%)		

104. In the event that a satisfactory legal agreement has not been entered into by 30 June 2017 it is recommended that the Director of Planning 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 planning obligations agreement, fails to ensure adequate provision of mitigation against the adverse impacts of the development through projects or contributions in accordance with saved policy 2.5 'Planning Obligations' of the Southwark Plan (2007), strategic policy 14 'Delivery and Implementation' of the Core Strategy (2011), policy 8.2 'Planning obligations' of the London Plan (2015) and the Planning Obligations and Community Infrastructure Levy SPD (2015).'

Conclusion on planning issues

- 105. The Elephant and Castle SPD is a key material consideration in relation to this site and has significant weight in determining this proposal. Any application which complies with the SPD and provides a sustainable form of development would be presumed to be acceptable under the National Planning Policy Framework (NPPF), unless material considerations indicate otherwise.
- 106. This proposal would deliver a 140 hotel bedspaces, 48 new homes and retail space within Elephant and Castle town centre in accordance with the vision and objectives of the Core Strategy and Elephant and Castle opportunity area. The proposed siting of the building on the site is consistent with the strategic policy objectives as it would create a pedestrianised route along the viaduct improving permeability with the wider area, d enabling the delivery of the 'low line' route at this part of Southwark. The proposal is for a tall building that will appear as a mid-height tower in a wellestablished cluster that would be appropriate and would not harm the setting of nearby heritage assets. Officers are satisfied that the design of the building is well considered, highly articulated with high quality materials and a simple elegant form that will sit well within the context of other tall buildings in the area. The proposal has been considered in the wider and local views, with careful consideration given to the materiality of the design as it comes down to the ground and it is considered that the scheme, with its finned design and deep-set masonry facade will complement the area of Newington Causeway and Tiverton Street. Officers are satisfied that, in terms of urban design the scheme would support strategic objectives and would not unreasonably compromise the development of nearby sites in accordance with the development plan.
- 107. The scheme would deliver a policy compliant mix of new homes, across a range of affordable and private market sale tenures, all of which would exceed minimum floor space requirements, are dual aspect and have access to private and communal amenity space. Overall the quality of accommodation is of a high standard and taking account viability considerations, officers are satisfied that the policy compliant tenure mix can be delivered on-site which is a key material consideration.
- 108. In conclusion, the scheme is considered to be a positive response to the objectives of the Elephant and Castle SPD that will provide visitor accommodation in the enterprise quarter, a range of new homes and policy compliant affordable housing. For this

reason the scheme is a sustainable form of development, which in line with the NPPF is bringing vacant land back into productive use. It is therefore recommended that planning permission be granted, subject to conditions and mitigation that will be secured by a planning obligations agreement.

Community impact statement

- 109. In line with the council's community impact statement the impact of this application has been assessed as part of the application process with regard to local people in respect of their age, disability, faith/religion, gender, race and ethnicity and sexual orientation. Consultation with the community has been undertaken as part of the application process.
 - a) The impact on local people is set out above.

Consultations

110. Details of consultation and any re-consultation undertaken in respect of this application are set out in Appendix 1.

Consultation replies

111. Details of consultation responses received are set out in Appendix 2.

Summary of consultation responses

112. Three (3) representations were received **objecting** to the proposal on the following grounds:

Objection: The design of the building is not of a high standard and nor sympathetic to the area.

Officer response: The proposed siting of the building on the site is consistent with strategic policy objectives as it would create a pedestrianised route along the viaduct improving permeability with the wider area and enabling the delivery of the 'low line' route at this part of Southwark. Officers are satisfied that the design of the building is well considered, highly articulate with high quality materials and a simple elegant form that will sit well within the context of other tall buildings in the area.

Objection: Loss of daylight/sunlight and overshadowing.

Officer response: A daylight assessment was submitted which shows that the majority of habitable rooms within nearby homes will continue to receive good levels of daylight and sunlight. A number of rooms at Telford House were identified as not meeting the required target but in these circumstances, and when weighed against the benefits of bringing this brownfield site into productive use, it is considered that the impact is not so severe as to warrant refusal of an otherwise acceptable scheme.

Comment: There is a lack of affordable housing.

Officer response: Affordable housing will be delivered on site, which is policy compliant in terms of amount and tenure. For these reasons the proposed level of

affordable housing is acceptable.

113. **Three** letters making **comments** on the application have been received. They are generally supportive of the application but make the following comments:

Ministry of Sound

114. **Comment:** The acoustic modelling undertaken to support the proposal does not properly reflect the noise impact from the Ministry of Sounds operations.

Officer response: The applicant has explained that noise surveys were undertaken on several dates at which music was played from courtyard loudspeakers and that this has informed the analysis of the effects of the Ministry of Sound on future occupiers. Officers are satisfied that the modelling based on actual events is robust and to this end does not required further details. Officers also note that there are restrictions on the times at music can be played in the Ministry of Sound courtyard. Based on the information provided, officers are satisfied that the proposed use would not adversely impact on the continuity of the nightclub owing to complaints about noise. The design of the building is of a suitable high standard for officers to be satisfied that it would not compromise the operation of the existing nightclub use.

Ministry of Justice

115. **Comment:** Appropriate measures should be put in place to mitigate potential noise impacts on the courts, particularly from construction traffic and to ensure safe access to their site for the public, jurors, police custody vehicles and judges.

Officer response: Appropriate conditions are recommended, including a construction management plan, to mitigation potential amenity impacts during construction.

Blyford Investment Co Ltd.

116. **Comment**: Reserving the right to object to the proposal as they are seeking to engage with the applicant to understand how the development will affect the redevelopment potential at 73 - 75 and 77 - 85 Newington Causeway. No formal objection has been submitted.

Officer response: After careful consideration and dialogue with the landowner, officers are satisfied that the design of the proposed building will not unreasonably compromise the development of the adjoining site or its continued use.

Greater London Authority – Stage 1 response

- 117. The application broadly complies with the London Plan, however, further information and /or confirmation as detailed below is required to comply fully:
- 118. **Principle of development:** The proposed development of the site for a hotel and residential uses within the Elephant and Castle opportunity area and central activities zone is supported.
- 119. **Housing:** The delivery of 48 new homes is supported. Both the applicant's viability appraisal and the independent assessment should be shared with the GLA officers

before the Mayor considers this application again, in order to assess compliance with London Plan 3.12, notably the maximum reasonable amount of affordable housing is being achieved.

- 120. **Urban design:** The design is broadly welcomed. The proposed height is compatible with the location and meets London Plan policy 7.7. No concerns are raised in relation to strategic views and historic environment and accords with London Plan policies 7.8, 7.10 and 7.12.
- 121. **Inclusive access:** The scheme complies with London Plan Policies 3.8 and 7.2. The affordable wheelchair units should be secured as social rent.
- 122. **Climate change:** The carbon dioxide savings exceed the target set within policy 5.2 of the London Plan. However, the comments in this report should be addressed before compliance with the London Plan energy policy can be verified.
- 123. **Transport:** Cyclist shower changing facilities for employees should be provided and secured by condition. Residents should be exempt from applying for parking permits and this should be secured via condition. A travel plan should be secured via condition/section 106 agreements. Funding for cycle hire membership for residents and staff should be provided for a period of at least five years and there shall be consideration given to a taxi rank and funding for upgraded 'Legible London' signage.

Network Rail

124. No objection to the proposal. Comments and informative(s) recommended.

London Underground (infrastructure protection)

125. No objection to the proposal. Conditions and informative (s) recommended.

Environment Agency

126. No objection to the proposal. Conditions recommended concerning contamination, infiltration of surface water, piling/foundation design methods.

Natural England

127. The proposal is not likely to result in significant impacts on statutory designated nature conservation sites or landscapes. No further comments.

Historic England

128. No comments on this proposal. Recommend that this application should be determined in accordance with national and local policy guidance.

Metropolitan Police

129. No objection to the proposal. Condition recommended.

London Fire and Emergency Planning Authority

130. No specific comments provided other than the proposal has been noted and placed on their files.

Thames Water

131. No objection to the proposal. Conditions and informative recommended.

Environmental protection team

132. No objection to the proposal. Conditions recommend protecting residential amenity and human health.

Flood and drainage team

133. No objection to the proposal. Condition relating to surface water drainage recommended.

Highway development management

134. Then principle of the scheme as amended is acceptable.

Ecology officer

135. No comments received.

Local economy team

- 136. This development would be expected to deliver 25 sustained jobs to unemployed Southwark residents, 25 short courses, and take on 6 construction industry apprentices during the construction phase, or meet the employment and training contribution.
- 137. An employment, skills and business support plan should be included in the S106 obligations

Human rights implications

- 138. 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.
- 139. This application has the legitimate aim of providing a mixed use development providing a hotel, retail and residential accommodation and a new route along the viaduct. 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.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Site history file: TP/1411-87	Chief Executive's	Planning enquiries telephone:
	Department	020 7525 5403
Application file: 16/AP/3144	160 Tooley Street	Planning enquiries email:
	London	planning.enquiries@southwark.gov.uk
Southwark Local Development	SE1 2QH	Case officer telephone:
Framework and Development		020 7525 5461
Plan Documents		Council website:
		www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Recommendation (to follow)

AUDIT TRAIL

Lead Officer	Simon Bevan, Director of Planning		
Report Author	Daniel Davies, Planning Officer		
Version	Final		
Dated	15 March 2017		
Key Decision	No		
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER			
Officer Title		Comments sought	Comments included
Strategic Director of Finance and Governance		No	No
Strategic Director of Environment and Leisure		No	No
Strategic Director of Housing and Modernisation		No	No
Director of Regeneration		No	No
Date final report sent to Constitutional Team		16 March 2017	

APPENDIX 1

Consultation undertaken

Site notice date: n/a

Press notice date: 01/09/2016

Case officer site visit date: n/a

Neighbour consultation letters sent: 13/09/2016

Internal services consulted:

Ecology Officer Economic Development Team Environmental Protection Team Formal Consultation [Noise / Air Quality / Land Contamination / Ventilation] Flood and Drainage Team HIGHWAY LICENSING Highway Development Management Housing Regeneration Initiatives Waste Management

Statutory and non-statutory organisations consulted:

EDF Energy Environment Agency Greater London Authority Historic England London Fire & Emergency Planning Authority London Underground Limited Metropolitan Police Service (Designing out Crime) Natural England - London Region & South East Region Network Rail (Planning) Thames Water - Development Planning Transport for London (referable & non-referable app notifications and pre-apps)

Neighbour and local groups consulted:

Flat 21 Devonshire House SE1 6PTFlatFlat 19 Devonshire House SE1 6PTFlatFlat 16 Devonshire House SE1 6PTFlatFlat 17 Devonshire House SE1 6PTFlatFlat 18 Devonshire House SE1 6PTFlatFlat 26 Devonshire House SE1 6PTFlatFlat 27 Devonshire House SE1 6PTFlatFlat 28 Devonshire House SE1 6PTFlatFlat 28 Devonshire House SE1 6PTFlatFlat 28 Devonshire House SE1 6PTFlat	19 Pioneer Building SE1 16 Pioneer Building SE1 13 Pioneer Building SE1 14 Pioneer Building SE1 15 Pioneer Building SE1 24 Pioneer Building SE1 26 Pioneer Building SE1 23 Pioneer Building SE1 20 Pioneer Building SE1
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Flat 22 Devonshire House SE1 6PT Flat 23 Devonshire House SE1 6PT Flat 24 Devonshire House SE1 6PT Flat 76 Stephenson House Rockingham Estate SE1 6PR Flat 77 Stephenson House Rockingham Estate SE1 6PR Flat 78 Stephenson House Rockingham Estate SE1 6PR Flat 75 Stephenson House Rockingham Estate SE1 6PR Flat 72 Stephenson House Rockingham Estate SE1 6PR Flat 73 Stephenson House Rockingham Estate SE1 6PR Flat 74 Stephenson House Rockingham Estate SE1 6PR Flat 13 Devonshire House SE1 6PT Flat 14 Devonshire House SE1 6PT Flat 15 Devonshire House SE1 6PT Flat 12 Devonshire House SE1 6PT Flat 1 Devonshire House SE1 6PT Flat 10 Devonshire House SE1 6PT Flat 11 Devonshire House SE1 6PT Flat 29 Devonshire House SE1 6PT Flat 20 Bath House SE1 6PU Flat 21 Bath House SE1 6PU Flat 22 Bath House SE1 6PU Flat 2 Bath House SE1 6PU Flat 17 Bath House SE1 6PU Flat 18 Bath House SE1 6PU Flat 19 Bath House SE1 6PU Flat 7 Bath House SE1 6PU Flat 8 Bath House SE1 6PU Flat 9 Bath House SE1 6PU Flat 6 Bath House SE1 6PU Flat 23 Bath House SE1 6PU Flat 3 Bath House SE1 6PU Flat 5 Bath House SE1 6PU Flat 8 Devonshire House SE1 6PT Flat 9 Devonshire House SE1 6PT Flat 1 Bath House SE1 6PU Flat 7 Devonshire House SE1 6PT Flat 3 Devonshire House SE1 6PT Flat 5 Devonshire House SE1 6PT Flat 6 Devonshire House SE1 6PT Flat 14 Bath House SE1 6PU Flat 15 Bath House SE1 6PU Flat 16 Bath House SE1 6PU Flat 13 Bath House SE1 6PU Flat 10 Bath House SE1 6PU Flat 11 Bath House SE1 6PU Flat 12 Bath House SE1 6PU Flat 71 Stephenson House Rockingham Estate SE1 6PR Flat 5 Stephenson House Rockingham Estate SE1 6PP Flat 6 Stephenson House Rockingham Estate SE1 6PP Flat 7 Stephenson House Rockingham Estate SE1 6PP Flat 4 Stephenson House Rockingham Estate SE1 6PP Flat 34 Stephenson House Rockingham Estate SE1 6PP Flat 35 Stephenson House Rockingham Estate SE1 6PP Flat 36 Stephenson House Rockingham Estate SE1 6PP Flat 39 Stephenson House Rockingham Estate SE1 6PR Flat 40 Stephenson House Rockingham Estate SE1 6PR Flat 41 Stephenson House Rockingham Estate SE1 6PR Flat 38 Stephenson House Rockingham Estate SE1 6PR Flat 8 Stephenson House Rockingham Estate SE1 6PP Flat 9 Stephenson House Rockingham Estate SE1 6PP Flat 37 Stephenson House Rockingham Estate SE1 6PR Flat 25 Stephenson House Rockingham Estate SE1 6PP Flat 26 Stephenson House Rockingham Estate SE1 6PP Flat 27 Stephenson House Rockingham Estate SE1 6PP Flat 24 Stephenson House Rockingham Estate SE1 6PP Flat 21 Stephenson House Rockingham Estate SE1 6PP Flat 22 Stephenson House Rockingham Estate SE1 6PP Flat 23 Stephenson House Rockingham Estate SE1 6PP Flat 31 Stephenson House Rockingham Estate SE1 6PP Flat 32 Stephenson House Rockingham Estate SE1 6PP Flat 33 Stephenson House Rockingham Estate SE1 6PP Flat 30 Stephenson House Rockingham Estate SE1 6PP

Flat 21 Pioneer Building SE1 6BN Flat 22 Pioneer Building SE1 6BN Flat 3 Pioneer Building SE1 6BN Flat 4 Pioneer Building SE1 6BN Flat 5 Pioneer Building SE1 6BN Flat 2 Pioneer Building SE1 6BN Third Floor Lancaster House SE1 6DF Flat 1 Pioneer Building SE1 6BN Flat 10 Pioneer Building SE1 6BN Flat 11 Pioneer Building SE1 6BN Flat 12 Pioneer Building SE1 6BN Flat 9 Pioneer Building SE1 6BN Flat 6 Pioneer Building SE1 6BN Flat 7 Pioneer Building SE1 6BN Flat 8 Pioneer Building SE1 6BN Flat 27 Pioneer Building SE1 6BN Unit 4 Second Floor Lancaster House SE1 6DG Unit 5 Second Floor Lancaster House SE1 6DG Unit 6 Second Floor Lancaster House SE1 6DG Unit 3 Second Floor Lancaster House SE1 6DG Advocates Lounge Sessions House SE1 6AZ Unit 1 Second Floor Lancaster House SE1 6DG Unit 2 Second Floor Lancaster House SE1 6DG 69 Borough Road London SE1 1DN 83 Borough Road London SE1 1DN 77-81 Borough Road London SE1 1DN Deeper Life Bible Church 82 Borough Road SE1 1DN Unit 7 Second Floor Lancaster House SE1 6DG 86 Borough Road London SE1 1DN 87 Borough Road London SE1 1DN Flat 32 Pioneer Building SE1 6BN Flat 33 Pioneer Building SE1 6BN Flat 34 Pioneer Building SE1 6BN Flat 31 Pioneer Building SE1 6BN Flat 28 Pioneer Building SE1 6BN Flat 29 Pioneer Building SE1 6BN Flat 30 Pioneer Building SE1 6BN Public Lounge Sessions House SE1 6AZ Jury Lounge Sessions House SE1 6AZ Flat 38 Pioneer Building SE1 6BN Flat 35 Pioneer Building SE1 6BN Flat 36 Pioneer Building SE1 6BN Flat 37 Pioneer Building SE1 6BN Fifth Floor Lancaster House SE1 6DF Railway Arch 73 Rear Of 229 Southwark Bridge Road SE1 6NP Railway Arch 75 231-233 Southwark Bridge Road SE1 6NP Railway Arch 76 235-237 Southwark Bridge Road SE1 6NP Land At 48-54 Newington Causeway SE1 8DR Living Accommodation 40-42 Newington Causeway SE1 6DR Unit B And C 40-42 Newington Causeway SE1 6DR Flat 10 Balppa House SE1 6BD Flat 1 Balppa House SE1 6BD Flat 2 Balppa House SE1 6BD Flat 3 Balppa House SE1 6BD Unit 4 Arches 78 And 79 Newington Court SE1 6DF 77 Borough Road London SE1 1DN Unit 1 Arches 84 And 85 Newington Court SE1 6DF Unit 3 Arches 80 And 81 Newington Court SE1 6DF Flat 8 Balppa House SE1 6BD Flat 9 Balppa House SE1 6BD Railway Arch E Newington Causeway SE1 6DH Flat 7 Balppa House SE1 6BD Flat 4 Balppa House SE1 6BD Flat 5 Balppa House SE1 6BD Flat 6 Balppa House SE1 6BD Unit A 40-42 Newington Causeway SE1 6DR Fourth Floor Lancaster House SE1 6DG Living Accommodation 29 Bath Terrace SE1 6PS Unit 1 5-9 Rockingham Street SE1 6PD Unit 2 5-9 Rockingham Street SE1 6PD Sixth Floor Lancaster House SE1 6DF Maisonette Second And Third Floor 38 Newington Causeway SE1

Flat 28 Stephenson House Rockingham Estate SE1 6PP Flat 29 Stephenson House Rockingham Estate SE1 6PP Flat 3 Stephenson House Rockingham Estate SE1 6PP Flat 42 Stephenson House Rockingham Estate SE1 6PR Flat 61 Stephenson House Rockingham Estate SE1 6PR Flat 62 Stephenson House Rockingham Estate SE1 6PR Flat 63 Stephenson House Rockingham Estate SE1 6PR Flat 60 Stephenson House Rockingham Estate SE1 6PR Flat 57 Stephenson House Rockingham Estate SE1 6PR Flat 58 Stephenson House Rockingham Estate SE1 6PR Flat 59 Stephenson House Rockingham Estate SE1 6PR Flat 68 Stephenson House Rockingham Estate SE1 6PR Flat 69 Stephenson House Rockingham Estate SE1 6PR Flat 70 Stephenson House Rockingham Estate SE1 6PR Flat 67 Stephenson House Rockingham Estate SE1 6PR Flat 64 Stephenson House Rockingham Estate SE1 6PR Flat 65 Stephenson House Rockingham Estate SE1 6PR Flat 66 Stephenson House Rockingham Estate SE1 6PR Flat 47 Stephenson House Rockingham Estate SE1 6PR Flat 48 Stephenson House Rockingham Estate SE1 6PR Flat 49 Stephenson House Rockingham Estate SE1 6PR Flat 46 Stephenson House Rockingham Estate SE1 6PR Flat 43 Stephenson House Rockingham Estate SE1 6PR Flat 44 Stephenson House Rockingham Estate SE1 6PR Flat 45 Stephenson House Rockingham Estate SE1 6PR Flat 54 Stephenson House Rockingham Estate SE1 6PR Flat 55 Stephenson House Rockingham Estate SE1 6PR Flat 56 Stephenson House Rockingham Estate SE1 6PR Flat 53 Stephenson House Rockingham Estate SE1 6PR Flat 50 Stephenson House Rockingham Estate SE1 6PR Flat 51 Stephenson House Rockingham Estate SE1 6PR Flat 52 Stephenson House Rockingham Estate SE1 6PR Flat 1 Rumford House Rockingham Estate SE1 6PW Unit 1 Newington Court Business Centre SE1 6DD Unit 2 To 3 Newington Court Business Centre SE1 6DD Unit 4 Newington Court Business Centre SE1 6DD 101 Newington Causeway London SE1 6BN Balppa House 57-61 Newington Causeway SE1 6BD 77-85 Newington Causeway London SE1 6BD Flat A 2 Avonmouth Street SE1 6NX Lancaster House 70 Newington Causeway SE1 6DF Unit 10 Newington Court Business Centre SE1 6DD Unit 3 Newington Court Business Centre SE1 6DD Unit 8 Newington Court Business Centre SE1 6DD Unit 5 Newington Court Business Centre SE1 6DD Unit 6 Newington Court Business Centre SE1 6DD Unit 7 Newington Court Business Centre SE1 6DD 237 Southwark Bridge Road London SE1 6NP 73-75 Newington Causeway London SE1 6BD 18 Newington Causeway London SE1 6DR 69-71 Newington Causeway London SE1 6BD Flat 46a Stephenson House Rockingham Estate SE1 6PR 103 Gaunt Street London SE1 6DP 20-22 Newington Causeway London SE1 6DR 6-8 Tiverton Street London SE1 6NZ 49-51 Tiverton Street London SE1 6NZ 231 Southwark Bridge Road London SE1 6NP 235 Southwark Bridge Road London SE1 6NP 6 Avonmouth Street London SE1 6NX 24 Newington Causeway London SE1 6DR Unit 9 Newington Court Business Centre SE1 6DD 2-4 Tiverton Street London SE1 6NZ Crown Court Basement To Second Floors Sessions House SE1 Flat 18 Rennie House Rockingham Estate SE1 6PN 6A7 48-54 Newington Causeway London SE1 6DR 5 Gaunt Street London SE1 6DP 2 Avonmouth Street London SE1 6NX 58-62 Newington Causeway London SE1 8DR First Floor And Second Floor 87-87a Newington Causeway SE1 Flat 7 Rennie House Rockingham Estate SE1 6PN 6DH 9 Rockingham Street London SE1 6PD

6DR First Floor Lancaster House SE1 6DF Excluding Second Fourth And Sixth Floor Lancaster House SE1 6DF Flat 1 Wellesley Court SE1 6PD Flat 2 Wellesley Court SE1 6PD Flat 3 Wellesley Court SE1 6PD Second Floor 44-46 Newington Causeway SE1 6DR First Floor 44-46 Newington Causeway SE1 6DR Ground Floor 44-46 Newington Causeway SE1 6DR Flat 8 Wellesley Court SE1 6PD Flat 9 Wellesley Court SE1 6PD Flat 10 Wellesley Court SE1 6PD Flat 7 Wellesley Court SE1 6PD Flat 4 Wellesley Court SE1 6PD Flat 5 Wellesley Court SE1 6PD Flat 6 Wellesley Court SE1 6PD Flat 8 Rankine House Rockingham Estate SE1 6PL Flat 9 Rankine House Rockingham Estate SE1 6PL Flat 1 Rennie House Rockingham Estate SE1 6PN Flat 7 Rankine House Rockingham Estate SE1 6PL Flat 4 Rankine House Rockingham Estate SE1 6PL Flat 5 Rankine House Rockingham Estate SE1 6PL Flat 6 Rankine House Rockingham Estate SE1 6PL Flat 14 Rennie House Rockingham Estate SE1 6PN Flat 15 Rennie House Rockingham Estate SE1 6PN Flat 16 Rennie House Rockingham Estate SE1 6PN Flat 13 Rennie House Rockingham Estate SE1 6PN Flat 10 Rennie House Rockingham Estate SE1 6PN Flat 11 Rennie House Rockingham Estate SE1 6PN Flat 12 Rennie House Rockingham Estate SE1 6PN Flat 18 Rankine House Rockingham Estate SE1 6PL Flat 19 Rankine House Rockingham Estate SE1 6PL Flat 2 Rankine House Rockingham Estate SE1 6PL Flat 17 Rankine House Rockingham Estate SE1 6PL Flat 14 Rankine House Rockingham Estate SE1 6PL Flat 15 Rankine House Rockingham Estate SE1 6PL Flat 16 Rankine House Rockingham Estate SE1 6PL Flat 24 Rankine House Rockingham Estate SE1 6PL Flat 25 Rankine House Rockingham Estate SE1 6PL Flat 3 Rankine House Rockingham Estate SE1 6PL Flat 23 Rankine House Rockingham Estate SE1 6PL Flat 20 Rankine House Rockingham Estate SE1 6PL Flat 21 Rankine House Rockingham Estate SE1 6PL Flat 22 Rankine House Rockingham Estate SE1 6PL Flat 17 Rennie House Rockingham Estate SE1 6PN Flat 11 Stephenson House Rockingham Estate SE1 6PP Flat 12 Stephenson House Rockingham Estate SE1 6PP Flat 13 Stephenson House Rockingham Estate SE1 6PP Flat 10 Stephenson House Rockingham Estate SE1 6PP Flat 8 Rennie House Rockingham Estate SE1 6PN Flat 9 Rennie House Rockingham Estate SE1 6PN Flat 1 Stephenson House Rockingham Estate SE1 6PP Flat 18 Stephenson House Rockingham Estate SE1 6PP Flat 19 Stephenson House Rockingham Estate SE1 6PP Flat 2 Stephenson House Rockingham Estate SE1 6PP Flat 17 Stephenson House Rockingham Estate SE1 6PP Flat 14 Stephenson House Rockingham Estate SE1 6PP Flat 15 Stephenson House Rockingham Estate SE1 6PP Flat 16 Stephenson House Rockingham Estate SE1 6PP Flat 21 Rennie House Rockingham Estate SE1 6PN Flat 22 Rennie House Rockingham Estate SE1 6PN Flat 23 Rennie House Rockingham Estate SE1 6PN Flat 20 Rennie House Rockingham Estate SE1 6PN Flat 19 Rennie House Rockingham Estate SE1 6PN Flat 2 Rennie House Rockingham Estate SE1 6PN Flat 5 Rennie House Rockingham Estate SE1 6PN Flat 6 Rennie House Rockingham Estate SE1 6PN

Flat 4 Rennie House Rockingham Estate SE1 6PN

Unit 1 Railway Arch 99 SE1 6PD Basement To Seventh Floors Eileen House SE1 6EF Basement Coburg House SE1 6LS Third Floor Coburg House SE1 6LS Coburg House 63-67 Newington Causeway SE1 6LS Flat 35a Stephenson House Rockingham Éstate SE1 6PP Flat 4 Rumford House Rockingham Estate SE1 6PW Flat 5 Rumford House Rockingham Estate SE1 6PW Flat 6 Rumford House Rockingham Estate SE1 6PW Flat 3 Rumford House Rockingham Estate SE1 6PW Flat 23 Rumford House Rockingham Estate SE1 6PW Flat 24 Rumford House Rockingham Estate SE1 6PW Flat 25 Rumford House Rockingham Estate SE1 6PW Flat 11 Trinity House SE1 6PX Flat 12 Trinity House SE1 6PX Flat 13 Trinity House SE1 6PX Flat 10 Trinity House SE1 6PX Flat 7 Rumford House Rockingham Estate SE1 6PW Flat 8 Rumford House Rockingham Estate SE1 6PW Flat 9 Rumford House Rockingham Estate SE1 6PW Flat 14 Rumford House Rockingham Estate SE1 6PW Flat 15 Rumford House Rockingham Estate SE1 6PW Flat 16 Rumford House Rockingham Estate SE1 6PW Flat 13 Rumford House Rockingham Estate SE1 6PW Flat 10 Rumford House Rockingham Estate SE1 6PW Flat 11 Rumford House Rockingham Estate SE1 6PW Flat 12 Rumford House Rockingham Estate SE1 6PW Flat 20 Rumford House Rockingham Estate SE1 6PW Flat 21 Rumford House Rockingham Estate SE1 6PW Flat 22 Rumford House Rockingham Estate SE1 6PW Flat 2 Rumford House Rockingham Estate SE1 6PW Flat 17 Rumford House Rockingham Estate SE1 6PW Flat 18 Rumford House Rockingham Estate SE1 6PW Flat 19 Rumford House Rockingham Estate SE1 6PW Flat 14 Trinity House SE1 6PX Flat 5 Trinity House SE1 6PX Flat 6 Trinity House SE1 6PX Flat 7 Trinity House SE1 6PX Flat 4 Trinity House SE1 6PX Flat 28 Trinity House SE1 6PX Flat 29 Trinity House SE1 6PX Flat 3 Trinity House SE1 6PX Flat 17a Telford House Rockingham Estate SE1 6NY Flat 34a Telford House Rockingham Estate SE1 6NY Flat 8a Telford House Rockingham Estate SE1 6NY Flat 8 Trinity House SE1 6PX Flat 9 Trinity House SE1 6PX 64-66 Newington Causeway London SE1 6DD Flat 19 Trinity House SE1 6PX Flat 2 Trinity House SE1 6PX Flat 20 Trinity House SE1 6PX Flat 18 Trinity House SE1 6PX Flat 15 Trinity House SE1 6PX Flat 16 Trinity House SE1 6PX Flat 17 Trinity House SE1 6PX Flat 25 Trinity House SE1 6PX Flat 26 Trinity House SE1 6PX Flat 27 Trinity House SE1 6PX Flat 24 Trinity House SE1 6PX Flat 21 Trinity House SE1 6PX Flat 22 Trinity House SE1 6PX Flat 23 Trinity House SE1 6PX Flat 20 Stephenson House Rockingham Estate SE1 6PP

Flat 24 Rennie House Rockingham Estate SE1 6PN Flat 25 Rennie House Rockingham Estate SE1 6PN Flat 3 Rennie House Rockingham Estate SE1 6PN Flat 13 Rankine House Rockingham Estate SE1 6PL Flat 17 Telford House Rockingham Estate SE1 6NY Flat 18 Telford House Rockingham Estate SE1 6NY Flat 19 Telford House Rockingham Estate SE1 6NY Flat 16 Telford House Rockingham Estate SE1 6NY Flat 13 Telford House Rockingham Estate SE1 6NY Flat 14 Telford House Rockingham Estate SE1 6NY Flat 15 Telford House Rockingham Estate SE1 6NY Flat 23 Telford House Rockingham Estate SE1 6NY Flat 24 Telford House Rockingham Estate SE1 6NY Flat 25 Telford House Rockingham Estate SE1 6NY Flat 22 Telford House Rockingham Estate SE1 6NY Flat 2 Telford House Rockingham Estate SE1 6NY Flat 20 Telford House Rockingham Estate SE1 6NY Flat 21 Telford House Rockingham Estate SE1 6NY 38 Newington Causeway London SE1 6DR Uxbridge Arms 29 Bath Terrace SE1 6PS 229 Southwark Bridge Road London SE1 6NP 26 Newington Causeway London SE1 6DR 82 Newington Causeway London SE1 6DE 87 Newington Causeway London SE1 6BD Flat 10 Telford House Rockingham Estate SE1 6NY Flat 11 Telford House Rockingham Estate SE1 6NY Flat 12 Telford House Rockingham Estate SE1 6NY Flat 1 Telford House Rockingham Estate SE1 6NY 233 Southwark Bridge Road London SE1 6NP Flat B 2 Avonmouth Street SE1 6NX Flat C 2 Avonmouth Street SE1 6NX Flat 26 Telford House Rockingham Estate SE1 6NY Flat 5 Telford House Rockingham Estate SE1 6NY Flat 6 Telford House Rockingham Estate SE1 6NY Flat 7 Telford House Rockingham Estate SE1 6NY Flat 42 Telford House Rockingham Estate SE1 6NY Flat 4 Telford House Rockingham Estate SE1 6NY Flat 40 Telford House Rockingham Estate SE1 6NY Flat 41 Telford House Rockingham Estate SE1 6NY Flat 10 Rankine House Rockingham Estate SE1 6PL Flat 11 Rankine House Rockingham Estate SE1 6PL Flat 12 Rankine House Rockingham Estate SE1 6PL Flat 1 Rankine House Rockingham Estate SE1 6PL Flat 8 Telford House Rockingham Estate SE1 6NY Flat 9 Telford House Rockingham Estate SE1 6NY 42a Tarn Street London SE1 6PE Flat 30 Telford House Rockingham Estate SE1 6NY Flat 31 Telford House Rockingham Estate SE1 6NY Flat 32 Telford House Rockingham Estate SE1 6NY Flat 3 Telford House Rockingham Estate SE1 6NY Flat 27 Telford House Rockingham Estate SE1 6NY Flat 28 Telford House Rockingham Estate SE1 6NY Flat 29 Telford House Rockingham Estate SE1 6NY Flat 37 Telford House Rockingham Estate SE1 6NY Flat 38 Telford House Rockingham Estate SE1 6NY Flat 39 Telford House Rockingham Estate SE1 6NY Flat 36 Telford House Rockingham Estate SE1 6NY Flat 33 Telford House Rockingham Estate SE1 6NY Flat 34 Telford House Rockingham Estate SE1 6NY Flat 35 Telford House Rockingham Estate SE1 6NY 3 Stephenson House Bath Terrace SE1 6PP 59 Stephenson House London SE1 6PR 22 Hanover Square W1S 1JA

Re-consultation: n/a

APPENDIX 2

Consultation responses received

Internal services

Economic Development Team

Statutory and non-statutory organisations

Historic England London Fire & Emergency Planning Authority London Underground Limited Metropolitan Police Service (Designing out Crime) Natural England - London Region & South East Region Network Rail (Planning) Thames Water - Development Planning Transport for London (referable & non-referable app notifications and pre-apps)

Neighbours and local groups

Flat 18 Pioneer Building SE1 6BN Senate Court Southernhay Gardens EX1 1NT 22 Hanover Square W1S 1JA 3 Stephenson House Bath Terrace SE1 6PP 49-51 Tiverton Street London SE1 6NZ 59 Stephenson House London SE1 6PR