

<b>Item No.</b> 7.2	<b>Classification:</b> Open	<b>Date:</b> 4 June 2018	<b>Meeting Name:</b> Planning Committee
<b>Report title:</b>	<b>Development Management planning application:</b> Application 17/AP/2326 for: Full Planning Application  <b>Address:</b> 40-46 SOLOMONS PASSAGE (FORMERLY 159-161 PECKHAM RYE), LONDON SE15  <b>Proposal:</b> Re-cladding of Blocks A & D including an increase in the parapet height of 450mm, rearrangement of the car parking (basement car park to be retained) and landscaping improvements.		
<b>Ward(s) or groups affected:</b>	Peckham Rye		
<b>From:</b>	Victoria Crosby		
<b>Application Start Date</b> 08/06/2017		<b>Application Expiry Date</b> 03/08/2017	
<b>Earliest Decision Date</b> 02/08/2017			

### RECOMMENDATION

1. a) That planning permission be granted, subject to conditions and the applicant entering into an appropriate legal agreement.
- b) That in the event that the requirements of a) are not met by 28 September 2018, the director of planning be authorised (if appropriate) to refuse planning permission for the reasons set out in paragraph 121.

### BACKGROUND INFORMATION

2. This planning application is one of a pair that propose works to the four blocks on Solomons Passage. One proposes the refurbishment of blocks A and D (this application ref. 17/AP/2326), and the other proposes the demolition and replacement of blocks B and C with a replacement building (ref. 17/AP/2330).

#### Site location and description

3. The application site encompasses four blocks (A, B, C and D) known as 40, 42, 44, and 46 Solomons Passage. It has an area of 0.35 hectares, fronting Peckham Rye Common to the south, and Solomons Passage to the west. The blocks were granted planning permission in 2006.
4. Block A (no. 46 Solomons Passage) is at the southern end of the site, facing onto Peckham Rye and Solomons Passage. It is a five storey block, with sixth storey corner element, and contains 23 flats.
5. Block B (no. 44 Solomons Passage) has four storeys fronting Solomons Passages with a fifth storey set back from this front elevation, and is six storeys high on the eastern side (close to the boundary with Aura Court). It has 31 flats.
6. Block C is three- and four-storeys high on the Solomons Passage frontage, with set

back fourth and fifth storeys on the eastern boundary with Williamson Court. It has 17 flats.

7. Block D (no. 40 Solomons Passage) is at the northern end of the site and is bounded by the rear gardens of the Waveney Avenue. Despite being referred to as block D, there are actually two different buildings. The larger C-shaped building fronts onto Solomons Passage has three storeys and contains twelve units (seven flats, one maisonette and four small two-storey houses). The smaller, two-storey building is set further to the east between Williamson Court and Waveney Avenue and contains only two flats.



8. The four blocks all have a combination of white render and horizontal timber-cladding to the elevations, with metal balcony railings.
9. Solomons Passage is a cul-de-sac of residential properties. On the north-western side of Solomons Passage, facing the site are three- and four- storey blocks of flats with deck accesses to the top floors. To the north of the application site are two-storey residential terraced properties along Waveney Avenue.
10. To the south and east of the application site are Aura Court (163 Peckham Rye) and Williamson Court (163a Peckham Rye). Aura Court is a large C-shaped block of 50

flats, 5- to 7-storeys high which fronts Peckham Rye, constructed in white render, timber cladding and aluminium cladding. Williamson Court is set behind Aura Court further back from Peckham Rye and is 4- to 5-storeys high, also in white render. The planning history suggests Aura Court and Williamson Court are of similar age to the application site.

11. The site is within the urban density zone. The site is not within a conservation area although Nunhead Green Conservation Area lies 11m to the north of the site and includes the Carden Road properties. The nearest listed buildings are nos. 141-153 Peckham Rye, which are grade II listed and are 51m to the west of the site. Peckham Rye is a Site of Importance for Nature Conservation and Metropolitan Open Land. The site is not within an archaeological priority area, and there are no tree protection orders on or near to the site.

### **Details of proposal**

12. This planning application is one of a pair at this site which together proposes the refurbishment of blocks A and D, and the replacement of blocks B and C with one larger building. This application relates to the renovation and recladding of blocks A and D.
13. The four blocks on the Solomons Passage site are of recent construction. Two planning permissions in 2006 approved the 85 units on the site:
  - Blocks A, B and C were approved by permission ref. 05/AP/2110 to provide 71 units (of which 25 were to be affordable housing) in one five-storey and two six-storey buildings.
  - The two buildings that form Block D were approved by ref. 05/AP/2109, as a two-storey building and a four-storey building providing a total of 14 flats (five of which were to be affordable housing).
14. The planning history section below indicates the recent construction of these four blocks, with approval of details applications made to discharge conditions on these two permissions in 2007-2012.
15. The applicant, Wandle Housing Association acquired the site in 2012 from the Receiver to the original developer, Greenacre Homes, who went into administration in August 2011 when blocks A, B and C had been completed. Block D was completed in May 2012. These two current applications have been submitted because significant flaws have been found with all four blocks as the buildings were poorly constructed and are suffering from the following problems:
  - Water ingress to flats and resulting problems with damp
  - Water damage to timber frame
  - Inadequate fire protection
  - Poor insulation
  - Defects to roof
  - Detailing of external cladding and frame shrinkage
  - Defective balconies
  - Poor drainage
  - Basement car park flooding
  - Ineffective ventilation
  - Poor condition of gas and plumbing services.
16. These issues came to light in 2013 and following more intrusive investigations in 2014. Wandle instigated what remedial action was necessary in order to ensure the

health and safety of residents and to minimise any further damage to the buildings. The actions taken included:

- 24-hour fire watch officers
  - Load testing of balconies to ensure structural integrity
  - Fitting sump pumps in lift shafts to keep free from any water ingress
  - Fire alarm decibel testing in flats and communal areas
  - Reissuing the evacuation procedure and fire notices
  - Additional gas safety checks
  - Replacement of rigid gas supply pipes with semi-rigid piping
  - Smoke extraction system testing and subsequent adjustment
  - CCTV monitoring
  - Fire stopping works
  - Monitoring and regular reviews.
17. The blocks are now mainly empty as most residents have been rehoused elsewhere. Because of these issues, across the Solomons Passage site, two blocks (A and D) are proposed to be refurbished to ensure they are fit for purpose, while the other two blocks (B and C) need to be demolished and replaced by a new block. The same architect has designed both schemes, ECD Architects.
18. This application proposes the refurbishment of blocks A and D with significant external works. Both blocks would be refurbished and redecorated internally, with no change to the number of units or the unit mix proposed. The main changes are the exterior of the two blocks which are to be reclad with two types of cladding. The brick cladding would be in a buff colour, while the light-weight aluminium composite metallic cladding would include a variety of texture and colour. Due to the load capacity of the timber structural frame, the proposed brick cladding cannot be used across the whole block so a metal cladding is proposed to the rear and flank elevations. Additionally, the approved tenure and affordable housing on-site would be changed to private housing with the exception of three shared ownership units for returning residents (detailed further below).

#### Block A

19. The application seeks planning permission to:
- Install buff brick cladding to the Peckham Rye and Solomons Passage elevations, to replace the existing render and timber cladding. Replacement of the balconies and balustrades with perforated anodised aluminium balustrades.
  - Clad the recessed top storey in aluminium panels facing onto Peckham Rye.
  - Add brick cladding and aluminium cladding to the side and rear elevations. Replace the balconies and install glazed balustrades.
  - Replace windows with aluminium framed windows and replace the doors.
  - Remove the element of curtain walling on the Solomons Passage side elevation and replace it with one window per floor instead.
  - On the rear north-eastern elevation, remove the curved curtain walling to the stair core from first to fifth floors and replace with a smaller, squared bay screened by vertical louvres.
  - Alterations to the ground floor are proposed on the front elevation to change windows to doors to provide three flats with access to the private gardens.
  - Adding cladding to each elevation of the block would increase its width by 30cm. A new parapet coping is proposed around the building, which would increase the parapet height of the 6-storey corner part by 45cm, and the other parapets of the building by 30cm.

- A replacement standing seam roof at a very shallow, 3 degree pitch. This increases the height of the roof pitch by 78cm.
- Landscaping works to the communal garden with planting, permeable hard surfacing, and creating three private gardens for the ground floor flats.
- Addition of a cycle store in the front garden, and cycle stands to the rear.
- Rebuild the refuse store and plant building in the front garden facing onto Peckham Rye (as the area is to be used for the construction compound).
- Replacement railings along both road frontages.

20. The resulting appearance of block A is shown in the image below, and an indication of the metal cladding to be used on the rear is shown in the second visual (although it shows the rear of the new building, rather than either block A or D).



*View of block A from Peckham Rye*



*Image of the metal cladding to be used at the rear and for the top storey*

## Block D

21. The application seeks permission to:

- Reclad both buildings in the same buff brick and aluminium composite panels as block A, to replace the existing render and timber cladding.
- Replace the roof with a standing seam roof; this increases the height of the buildings by 30cm. The addition of a coping around the flat roof increases the height of the boundary wall with Waveney Avenue by 20cm (from 5.3m to 5.5m).
- Reclad the smaller two storey building with the aluminium panels, and replacement standing seam roof. This result in an additional height of 30cm.
- Replace windows with aluminium framed windows and replace doors.
- Landscaping works within the communal garden/courtyard area.
- Erect a replacement cycle store building, and stands for visitor cycles.

### Change of tenure – loss of approved affordable housing

22. As approved by the 2006 permissions, blocks A and D were required through the section 106 agreements to provide a total of 12 shared ownership units (11 in block A and 1 in block D), 4 social rent units (in block D) and the other 21 units in the two blocks were to be market housing. Table 1 below sets out the approved tenure split for each of the four blocks.

Table 1 – tenure as approved in 2006 permissions

<b>Tenure (as approved)</b>	<b>Social rent</b> Units (hab rooms)	<b>Shared ownership</b> Units (hab rooms)	<b>Private</b> Units (hab rooms)	<b>Totals</b> Units (hab rooms)
A	0 (0)	11 (33)	12 (34)	23 (67)
B	0 (0)	0 (0)	31 (112)	31 (112)
C	14 (49)	0 (0)	3 (11)	17 (60)
D	4 (15)	1 (3)	9 (29)	14 (47)
Total units	18 21.2% by unit	12 14.1% by unit	55 64.7% by unit	85
Total habitable rooms	(64) 22.4% by hab room Combined 35% affordable by hab room	(36) 12.6% by hab room	(186) 65.0% by hab room	(286)

23. Table 2 below shows the proposed tenure of the proposed 3 blocks on the site; the 37 units in blocks A and D would comprise 34 units of market housing and 3 units for returning shared ownership households. This is a loss of 4 social rent units and 9 shared ownership units compared with the approved tenure split for these two blocks, and such a change would require the obligations of the original 2006 section 106 legal agreements to be changed. However Wandle has acquired off-site properties and made them available as affordable units to offset this loss; this is described further in the Considerations section of the report. The affordable housing within the proposed new building is considered in the other current application ref. 17/AP/2330.

Table 2 – tenure as proposed

<b>Tenure (proposed on site)</b>	<b>Social rent in perpetuity</b> Units (hab rooms)	<b>Shared ownership</b> Units (hab rooms)	<b>Private</b> Units (hab rooms)	<b>Totals</b> Units (hab rooms)
A	0 (0)	1 (3)	22 (69)	23 (72)
New build (to replace blocks B and C)	14* (43)	0 (0)	32 (126)	50 (169)
D	0 (0)	2 (6)	12 (41)	14 (47)
Total units	14* (16.1%)	3 (3.4%)	70 (80.5%)	87
Total hab rooms	43 (14.9%)	9 (3.1%)	236 (82%)	(288)
	Combined 18% by hab room on site			

\* Indicative number of units that 43 habitable rooms could provide.

### Car parking

24. The basement car park beneath blocks B and C is accessed by a ramp at the rear of block A and provides 62 parking spaces for all 4 blocks. It is to be retained, but rearranged to provide 51 parking spaces, new plant areas, motorcycle parking and cycle parking spaces for the retained units in blocks A and D, and those in the new building.

### **Planning history**

25. 03/AP/1028 Application type: Full Planning Application (FUL)  
Demolition of existing buildings and erection of a six storey building facing Peckham Rye and a six storey and five storey building facing Solomons Passage to accommodate 79 flats with 47 underground and 5 surface parking spaces, provision of landscaping and formation of two vehicular access points from Solomons Passage and Peckham Rye.  
Decision date 19/01/2004 Decision: Refuse (REF) Appeal decision date: 18/10/2004 Appeal decision: Planning appeal allowed (ALL).  
Reason(s) for refusal:
- 04/AP/0694 Application type: Full Planning Application (FUL)  
Demolition of existing buildings and erection of a 6 storey block on the corner of Peckham Rye and Solomons Passage comprising 33 residential units, (Block A); a 5 storey block fronting Solomons Passage comprising of 20 residential units, (Block B) and a part four and part five storey building adjoining the commercial unit on Solomons Passage comprising 18 affordable residential units, (Block C); together with basement parking for a total of 52 cars and associated landscaping.  
Decision date 03/08/2004 Decision: Granted with 'Grampian' Condition (GWGC)
- 05/AP/2117 Application type: Full Planning Application (FUL)  
Variation of condition 7 of planning permission 04-AP-0694 to allow residents from the adjacent development (land at the rear of 159-161 & 163 Peckham Rye) to utilise 10 of the car parking spaces permitted as part of the consented development  
Decision date 01/02/2006 Decision: Refuse (REF)  
Reason(s) for refusal:
- 05/AP/2109 Application type: Full Planning Application (FUL)  
Demolition of existing buildings and the erection of a new build 1 x 2 storey block (Unit C) comprising 1 x 3 bedroom flat and 1 x 2 bedroom flat, a 2 storey block comprising 4 x 2 bedroom duplex flats (Unit B) and a 3 storey building with recessed 4th floor comprising of 8 x 2 bedroom flats (Unit A) with associated secure off-street parking to be provided on the

<p>adjoining site Decision date 01/11/2006 Decision: Granted with Legal Agreement (GWLA)</p>
<p>05/AP/2110 Application type: Full Planning Application (FUL) Demolition of the existing industrial building and the erection of 3 residential buildings (two six storey and one five storey building) comprising a total of 71 residential units. Block A: a six storey block fronting Peckham Rye; Block B: a six storey building on Solomons Passage; Block C: a five storey building together with basement parking for 62 no. cars. (Amendment to approved application 04-AP-0694 and 03-AP-1028- RE-SUBMISSION of refused application 05-AP-0797). Decision date 16/11/2006 Decision: Granted with Legal Agreement (GWLA)</p>
<p>08/AP/0265 Application type: Full Planning Application (FUL) Amendment to the location of basement access ramp and Block A together with revised basement parking, layout and external works. Previously approved under application 05-AP-2110 in November 2006. Decision date 28/04/2008 Decision: Granted (GRA)</p>
<p>11/AP/1531 Application type: Variation: non-material changes (VNMC) Non-material amendment for the relocation of the cycle store on planning permission 05-AP-2109 for: (Demolition of existing buildings and the erection of a new build 1 x 2 storey block (Unit C) comprising 1 x 3 bedroom flat and 1 x 2 bedroom flat, a 2 storey block comprising 4 x 2 bedroom duplex flats (Unit B) and a 3 storey building with recessed 4th floor comprising of 8 x 2 bedroom flats (Unit A) with associated secure off-street parking to be provided on the adjoining site). Decision date 13/08/2012 Decision: Agreed - for app types VLA &amp; VNMC (AGR)</p>
<p>16/EQ/0183 Application type: Pre-Application Enquiry (ENQ) Partial redevelopment of the residential properties at 159-161 Peckham Rye, London. Decision date 01/11/2016 Decision: Pre-application enquiry closed (EQC)</p>

### Planning history of adjoining sites

26. The Cottage, Solomons Passage:
- Ref. 10/AP/2067 for refurbishment of existing residential property involving the erection of a two-storey front extension, first floor extension to west elevation, installation of oriel windows to the front and rear elevations, erection of 2.1m boundary fence, installation of rooflights and extension of garden area into Solomons Passage. Granted.
  - Ref. 07/AP/2956 for demolition of the existing house and the construction of a new residential development comprising 3 flats: two x 2-bed duplex/maisonette units and one x 1-bedroom flat on lower ground, ground and first floor levels. Refused.
27. Williamson Court – ref. 06/AP/2223 for construction of an entrance screen, with door and bank of letter boxes, to provide additional security at ground floor level to the existing open staircase to the residential block of flats located at the rear of the site. Granted.
28. Aura Court – ref. 11/AP/1504 for creation of an additional floor (at seventh floor level) on top of an existing top floor flat to provide additional residential accommodation for flat 50, including additional terrace areas on the south and west elevations. Refused.
29. 2 Solomons Passage – ref. 16/AP/0914 Retention of timber terrace with integrated planters to rear of property and new external door in existing opening at ground floor level. Refused.



## KEY ISSUES FOR CONSIDERATION

### Summary of main issues

30. The main issues to be considered in respect of this application are:
- a) Principle of the proposed alterations
  - b) Environmental impact assessment
  - c) Design (including layout, height and massing)
  - d) Impact on heritage assets
  - e) Housing quality and mix
  - f) Affordable housing
  - g) Impact of proposed development on amenity of adjoining occupiers and surrounding area
  - h) Transportation and highways
  - i) Trees and ecology
  - j) Sustainability (including energy, flood risk, drainage, and contamination)
  - k) Planning obligations and Community Infrastructure Levy

### Planning policy

31. The statutory developments plans for the Borough comprise the National Planning Policy Framework (2012), London Plan (2016), Southwark Core Strategy (2011), and saved policies from the Southwark Plan (2007). The site is within the area of the Peckham and Nunhead Area Action Plan (2014).

#### National Planning Policy Framework (the Framework)

32. Section 1: Building a strong, competitive economy  
Section 4: Promoting sustainable transport  
Section 6: Delivering a wide choice of high quality homes  
Section 7: Requiring good design  
Section 8: Promoting healthy communities  
Section 10: Meeting the challenge of climate change, flooding and coastal change  
Section 11: Conserving and enhancing the natural environment  
Section 12: Conserving and enhancing the historic environment.

#### The London Plan 2016

33. 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 3.8 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 5.2 Minimising carbon dioxide emissions

Policy 5.3 Sustainable design and construction

Policy 5.7 Renewable energy

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 6.3 Assessing effects of development on transport capacity

Policy 6.5 Funding Crossrail and other strategically important transport infrastructure

Policy 6.9 Cycling

Policy 6.10 Walking

Policy 6.13 Parking

Policy 7.1 Lifetime neighbourhoods

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 7.8 Heritage assets and archaeology

Policy 7.9 Heritage-led regeneration

Policy 7.14 Improving air quality

Policy 7.15 Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes

Policy 7.19 Biodiversity and access to nature

Policy 8.2 Planning obligations

Policy 8.3 Community Infrastructure Levy.

#### Greater London Authority Supplementary Guidance

34. Affordable Housing and Viability (August 2017)  
Housing SPG (March 2016)  
Play and Informal Recreation SPG (September 2012)  
Sustainable Design and Construction SPG (April 2014).

#### Core Strategy 2011

35. Strategic policy 2 – Sustainable transport  
Strategic policy 3 – Shopping, leisure and entertainment  
Strategic policy 5 – Providing new homes  
Strategic policy 6 – Homes for people on different incomes  
Strategic policy 7 – Family homes  
Strategic policy 11 – Open spaces and wildlife  
Strategic policy 12 – Design and conservation  
Strategic policy 13 – High environmental standards  
Strategic policy 14 – Implementation and delivery.

Southwark Plan 2007 (July) - saved policies

36. 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 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 3.7 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 3.28 Biodiversity

Policy 4.2 Quality of residential accommodation

Policy 4.3 Mix of Dwellings

Policy 4.4 Affordable Housing

Policy 4.5 Wheelchair Affordable Housing

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 People and the Mobility Impaired

Policy 5.8 Other Parking.

#### Southwark Supplementary Planning Documents

37. 2015 Technical Update to the Council's Residential Design Standards SPD (2011)  
Design and Access Statements SPD (2007)  
Draft Affordable Housing SPD (2011)  
Sustainable Design and Construction SPD (2009)  
Sustainable Transport SPD (2010)  
Section 106 Planning Obligations and CIL SPD (2015)  
Sustainability Assessment SPD (2009).

#### Peckham and Nunhead Area Action Plan (2014)

38. The Peckham and Nunhead Area Action Plan (PNAAP) was adopted on 26 November 2014 and sets out the planning framework for delivering development in Peckham and Nunhead. The AAP identifies a "wider action area" and a "core action area" the latter of which is expected to be the focus of development and intensification.
39. The application site is within the wider action area, within the Nunhead, Peckham Rye and Honor Oak character area. It is not an identified proposal site.

Policy 15 Residential parking

Policy 16 New homes

Policy 17 Affordable and private homes

Policy 18 Mix and design of new homes

Policy 19 Open space and sites of importance for nature conservation

Policy 20 Trees

Policy 21 Energy

Policy 22 Waste, water, flooding and pollution

Policy 23 Public realm

Policy 24 Heritage

Policy 25 Built form

Policy 26 Building heights

Policy 31 Land use

Policy 32 Transport and movement

Policy 33 Built environment

Policy 48 Presumption in favour of sustainable development

Policy 49 Section 106 planning obligations and community infrastructure levy

#### **Principle of the proposed alterations**

40. The existing buildings on this site were built between 2006 and 2012. It is clear from the documents submitted and the site visits that the buildings were poorly constructed and that they are suffering from a range of problems that have significantly affected the quality of accommodation. Blocks A and D are in better condition than the other two blocks on the site, and can be more readily rectified by the re-cladding, balcony replacement and internal refitting proposed by this application.

41. There is no objection in principle to the significant refurbishment work required both internally and externally to bring these two blocks up to current Building Regulations to improve the quality of accommodation and safety of the residential units. These works would allow the units to be brought back into a habitable state and be occupied again.
42. The loss of the approved affordable housing would be contrary to the London Plan policy 3.14 and Council policies which seek to increase affordable housing in the borough. The principle and detail of this aspect of the proposal is assessed in the affordable housing section below.

### **Environmental impact assessment**

43. The scale of development proposed by this application does not reach the minimum thresholds established in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 that would otherwise trigger the need for an environmental impact assessment. The proposal's location and nature do not give rise to significant environmental impacts in this urban setting, nor when the cumulative impacts are considered with the other development proposed on this site and in the surrounding area. An EIA is not required.

### **Design (including layout, height and massing)**

44. The NPPF stresses the importance of good design and states in paragraph 56 that: *"Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people."* Policy SP12 of the Core strategy 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 3.11 states that all developments should ensure that they maximise the efficient use of land whilst ensuring that, among other things, the proposal ensures a satisfactory standard of accommodation and amenity for future occupiers of the site.
45. Saved policy 3.12 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. The quality of a design incorporates the fabric, geometry and function of the proposal as they are bound together in the overall concept for the design. Saved policy 3.13 asserts that the principles of good urban design must be taken into account, including the height, scale and massing of buildings, consideration of the local context, its character and townscape as well as the local views and resultant streetscape.
46. The refurbished buildings would have the same layout and provide the same amount of accommodation as the existing, and represent efficient use of land in compliance with saved policy 3.11 of the Southwark Plan. The parapet heights of the refurbished buildings would be 30-45cm higher than the existing, and the roof height of block A would be 80cm higher, but this is a relatively small change to allow for improved insulation to the walls and roofs. It is considered that these small increases in height would not cause any harm to the surrounding townscape.
47. Most of the buildings close to the site are brick, mostly yellow or buff brick. The proposed materials would be buff brick and a composite aluminium metal cladding, and would match into the proposed new block (replacing blocks B and C) to give a consistent approach across the development. The buff brick is welcomed and it is stated in the Design and Access Statement that the specific brick would be selected to fit in with neighbouring buildings. The amount of brick cladding needs to be restricted due to the limits of the retained timber frame of these two blocks. Light-weight metal

cladding is proposed for the recessed areas on Solomons Passage, upper-most storey and side and rear elevations. The metal cladding would be light in colour, with varied finishes to add visual interest and applied with a horizontal emphasis. Given the limitations on the buildings, this would be an acceptable approach and would represent an improvement on the existing failing cladding and render.

48. Conditions are suggested to ensure that the final brick selected is indeed responsive to the surrounding buildings, and that the metal cladding would include the variety of colours and textures suggested to ensure that this is subtle and not jarring. Detailed drawings would be required by a condition, particularly as the reveals to the aluminium windows would increase in depth with the thicker walls. The perforated metal balconies proposed are also appropriate, although again samples would be conditioned. Further technical information was provided on the proposed cladding and insulation during the course of the application, and would be considered at the Building Regulations stage.
49. Block D is within the proposed borough view from One Tree Hill towards St Paul's Cathedral. The limited changes to its height, and the amended materials would not harm this proposed view.
50. Limited detail has been provided of the proposed additional cycle store at the front. With the proposed rebuilding of the existing front store building (which fronts onto Peckham Rye) there is potential to improve its appearance and tie it into the proposed brick cladding. Further details of these buildings would be conditioned to ensure a suitable appearance for these structures in a prominent publicly-visible location.
51. Further detail on the proposed landscaping (species, sizes, surfacing materials, railings) would be conditioned to ensure a suitable finish and biodiversity enhancements.

#### **Impact on heritage assets**

52. The blocks are not listed and are not in a conservation area, however the development could impact upon views into and out from Nunhead Green Conservation Area and views across Peckham Rye from The Gardens Conservation Area. The site is 50m from the grade II listed buildings of nos. 141-153 Peckham Rye.
53. In considering the impact of a proposal on a heritage asset such as a listed building, the local planning authority must have regard to planning legislation in its determination of a planning application. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that, when considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting, or any features of special architectural or historic interest which it possesses. Section 72(1) of the Act requires that, with respect to any buildings or other land in a conservation area, when considering whether planning permission should be granted, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area. In this context, "preserving", means doing no harm.
54. The National Planning Policy Framework states at paragraph 131 that in determining a planning application, the local planning authority should take account of:
  - the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
  - the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

- the desirability of new development making a positive contribution to local character and distinctiveness.
55. Paragraph 132 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation.
  56. Southwark Plan policy 3.15 "Conservation of the historic environment" requires development to preserve or enhance the special interest or historic character or appearance of buildings and areas of historical or architectural significance. Saved policy 3.18 "Setting of listed buildings, conservation areas and world heritage sites" states that permission will not be granted for developments that would not preserve or enhance the immediate or wider setting of a listed building and important views of a listed building or the setting of a conservation area. Saved policy 3.19 "Archaeology" applies to sites in archaeological priority areas.
  57. The proposed re-cladding of these two blocks is considered to preserve the setting of the Nunhead Green Conservation Area to the north of the site, and in longer views from The Gardens Conservation Area on the west side of Peckham Rye, by improving the appearance of these recently-constructed building. Similarly, the works would preserve the setting of the grade II listed building at nos. 141-153 Peckham Rye in long views across Peckham Rye Common and along the Peckham Rye street scene.
  58. The site is not within an archaeological priority area, and the proposal involves limited groundworks associated with the proposed external changes.
  59. For these reasons the proposal is considered to comply with sections 66 and 72 of the Listed Buildings and Conservation Areas Act, the NPPF, Core Strategy strategic policy 12, saved policies 3.15, 3.18 and 3.19 of the Southwark Plan.

### **Housing quality and mix**

60. The proposed changes to blocks A and D do not alter the number of units, nor the internal sizes of the existing flats. The two blocks currently provide 37 units, and would continue to provide 37 units in the following mix:

Table 3 – proposed unit mix ( & as existing)

<b>Unit size</b>	<b>Number</b>	<b>Percentage</b>
1-bedroom	7	19%
2-bedroom	24	65%
3-bedroom	6	16%
<b>Total</b>	<b>37</b>	<b>100%</b>

61. This mix does not comply with the minimum 20% of 3-bedroom units sought by policy 18 of the Peckham and Nunhead AAP, however as it is not changing from the existing mix and the internal layouts of blocks A and D remain the same, this is acceptable.
62. The internal sizes of the flats in block A would not change from their existing sizes, ranging between 47-50sqm for 1-bedroom flats, 60-80sqm for 2-bedroom flats, and 88-93sqm for 3-bedroom flats. In block D, the flats, maisonette and houses would retain the same internal area; 3 x two-storey houses and a maisonette would be under-sized by between 3sqm and 10sqm compared with the current Residential Design Standards SPD standards. However as all units retain their existing internal size, this is not a reason to refuse the proposal.
63. The proposed changes would improve the quality and safety of the uninhabited flats

by rectifying the poor construction quality of these buildings. Levels of daylight, sunlight and outlook to the units within blocks A and D would remain the same as the existing as the same openings would be retained, with the small changes to install ground floor doors to access new private gardens. The daylight impacts of the proposed new building to replace blocks B and C on the rooms in blocks A and D is considered in the other report to the Planning Committee for that proposed building.

64. The changes to the front area of block A would provide private amenity space to three ground floor flats, as an improvement upon the existing provision, and the balconies to the upper units would be replaced in the same size as the existing. In terms of communal amenity space for these two blocks, block A would retain most of its front garden area (as the proposed cycle store would be sited here), and block D would retain its central courtyard, with improved landscaping and planting proposed to both. No on-site playspace was included in the original permissions for the development, and none is proposed here as part of the renovation works.
65. No wheelchair units are currently provided in either block and none are proposed to be created in this application as the internal divisions of the buildings would not change.
66. Block A is most affected by traffic noise along Peckham Rye, and while the proposed cladding would be thicker than the existing, units in block A would need enhanced glazing and ventilation to achieve suitable internal noise levels for bedrooms and living rooms. Block D would achieve internal noise levels in line with the British Standard through the use of double glazing and trickle ventilation. Conditions regarding internal noise levels and vibration are proposed to ensure current standards are achieved with the external building fabric and glazing for these refurbished properties.
67. The submitted noise assessment also considers noise from plant within the development (e.g. in a store in front of block A on Peckham Rye). A condition is proposed to limit the plant noise at the nearby residential units.
68. Subject to these conditions, the proposal is considered to maintain and in some areas improve the amenity of the occupiers of blocks A and D. When the overall reason for requiring these works is considered, it would ensure the units are upgraded to a suitable standard and brought back into use.

### **Affordable housing**

69. London Plan policy 3.14 states that the loss of housing including affordable housing should be resisted unless the housing is replaced at existing or higher densities, and policy 3.12 seeks the maximum reasonable amount of affordable housing. Core Strategy policy 6 "Homes for people on different incomes" and the Peckham and Nunhead AAP require as much affordable housing on developments of 10 or more units as is financially viable, and at least 35%. Saved policy 4.4 "Affordable housing" of the Southwark Plan seeks at least 35% of all new housing as affordable within the urban density zone. The draft Affordable Housing SPD sets out the sequential test to the delivery of affordable housing to achieve as much as possible; the first stage being on-site provision, secondly and only in exceptional circumstances affordable housing may be provided off-site and must be in the local area and delivered at the same time as the development. Finally in exceptional circumstances, a pooled contribution may be allowed in lieu of off-site provision. Where either off-site or a contribution is proposed at least as much affordable housing must be provided as would have been provided if the minimum 35% affordable housing requirement were achieved on site.

### *Affordable housing as approved*

70. The two 2006 planning permissions for the four blocks required 30 affordable housing



units to be provided out of the 85 flats approved in the following tenure mix:

Table 4 – tenure as approved in 2006 permissions

<b>Tenure (as approved)</b>	<b>Social rent</b> Units (hab rooms)	<b>Shared ownership</b> Units (hab rooms)	<b>Private</b> Units (hab rooms)	<b>Totals</b> Units (hab rooms)
A	0 (0)	11 (33)	12 (34)	23 (67)
B	0 (0)	0 (0)	31 (112)	31 (112)
C	14 (49)	0 (0)	3 (11)	17 (60)
D	4 (15)	1 (3)	9 (29)	14 (47)
Total units	18 21.2% by unit	12 14.1% by unit	55 64.7% by unit	85
Total habitable rooms	(64) 22.4% by hab room Combined 35% affordable by hab room	(36) 12.6% by hab room	(186) 65.0% by hab room	(286)

71. Blocks A and D were approved to provide 12 shared ownership units (36 habitable rooms), 4 social rent (15 habitable rooms) and 21 private units (63 habitable rooms), contributing to a site-wide total of 30 affordable units (as 100 habitable rooms) across the four blocks.

*Affordable housing as occupied*

72. Once the four blocks were constructed and ready for occupation, Wandle actually operated the site with a greater provision of affordable units, being a registered provider. In blocks A and D, no social rent units were provided (although more was provided in blocks B and C instead), and 31 shared ownership units (19 more than the 12 secured by the planning permissions). Further changes from the permission were that five of the approved 2-bedroom flats in block A were actually constructed as 3-bedroom flats. Therefore the occupied tenure for the four blocks is set out below for units and habitable rooms:

Table 5 – tenure as occupied

<b>Tenure (as occupied)</b>	<b>Social rent</b> Units (hab rooms)	<b>Shared ownership</b> Units (hab rooms)	<b>Private</b> Units (hab rooms)	<b>Totals</b> Units (hab rooms)
A	0	23 (72)	0	23 (72)
B	31 (112)	0	0	31 (112)
C	17 (62)	0	0	17 (62)
D	0	14 (47)	0	14 (47)
Total units	48 56.5% by unit	37 43.5% by unit	0 0% by unit	85
Total habitable rooms	(174) 59.4% by hab room Combined 100% affordable by hab room	(119) 40.6% by hab room	(0)	(293)

*Proposed on-site affordable housing*

73. As part of these two current planning applications, there would be a reduction in the on-site affordable housing secured by the 2006 planning permissions across the Solomons Passage site, although the off site provision (detailed further below) would offset this loss. The loss of approved affordable housing and the proposed provision on- and off-site has been considered and assessed across both current planning applications. This gives the cumulative view of both applications, rather than dealing with the two applications separately.
74. This application seeks permission to change the tenure of the 37 units in blocks A and D to have no social rent units, 3 shared ownership units and 34 market units. The three shared-ownership units would be provided to households returning to the same flats as they previously occupied. The proposed tenure in blocks A and D would have the following unit and tenure mix (Table 6), along with the new building proposed by application ref. 17/AP/2330:

Table 6 – tenure as proposed on-site

<b>Tenure (proposed on site)</b>	<b>Social rent</b> Units (hab rooms)	<b>Shared ownership</b> Units (hab rooms)	<b>Private</b> Units (hab rooms)	<b>Totals</b> Units (hab rooms)
A	0 (0)	1 (3)	22 (69)	23 (72)
New build (to replace blocks B and C)	14* (43)	0 (0)	32 (126)	50 (169)
D	0 (0)	2 (6)	12 (41)	14 (47)
Total units	14* (16.1%)	3 (3.4%)	70 (80.5%)	87
Total hab rooms	43 (14.9%)	9 (3.1%)	236 (82%)	(288)
	Combined 18% by hab room on site			

*\* Indicative number of units that can be provided from 43 habitable rooms.*

75. The figures above can be compared with Table 4, and show when compared with the approved tenure mix in the 2006 permissions, there would be a loss of 4 social rent units (21 habitable rooms) and a loss of 9 approved shared ownership units (27 habitable rooms) across the site. There is a greater loss when compared with how Wandle was operating the site until they were vacated (as can be seen by comparing tables 5 and 6).
76. Planning application ref. 17/AP/2330 proposes two additional units in the new building, which would increase the number of units in all buildings from 85 to 87, and the number of habitable rooms would increase from the approved 286 to 288. A 35% provision of affordable housing on the proposed scheme of 288 habitable rooms would be 101 rooms. Across the two current planning applications, 52 habitable rooms which are 18% of the habitable rooms on site would be affordable; this is below the minimum 35% policy requirement.
77. The loss of the affordable housing approved in the 2006 permissions is contrary to policy 3.14 of the London Plan.
78. Wandle provided a viability assessment with these applications which considers that the two schemes are not viable, even at 100% market housing, due to the costs of demolishing and rebuilding, and significantly renovating the blocks. The insurance payment from NHBC for the poor quality construction does not cover the predicted costs. Wandle has also incurred additional unusual costs in rehousing tenants off-site

in newly acquired off-site properties. The resulting negative residual land value in Wandle's viability assessment suggests that a landowner would not undertake such a redevelopment of the site, however Wandle needs to redevelop this site and make the properties habitable again. While Wandle considers even a completely private scheme with no on-site affordable housing is not viable, it will commit to providing 43 habitable rooms of social rent in the new building (that replaces blocks B and C) in perpetuity, and will provide 3 shared ownership units (1 in block A and 2 in block D) to returning occupiers. This represents 18% affordable housing by habitable room on-site, and is far below the minimum 35% sought by planning policies.

79. The viability assessment has been reviewed by an independent assessor, GVA, on behalf of the council. GVA has come to a different conclusion than the applicant on the viability of the scheme, and considers 36% on-site affordable housing can be provided on site within a viable scheme. The main difference between the two assessments is that GVA considers the site to have a negative land value at present because the existing buildings are a liability. Due to the difference between this negative existing site value, and the gross development value once the proposals have been constructed, a higher percentage of affordable housing can be provided on-site.

80. The applicant has provided an initial response to the GVA report which is summarised as follows:

- It amends the construction costs to be closer to GVA's cost estimate.
- It highlights the very low, historic rent levels that the social rent units would be let at, rather than current rent levels that GVA has assumed.
- It highlights the cost of the providing the off-site units at affordable levels (when these were purchased at open market prices).
- Reiterates that the applicant has looked to provide 35% affordable housing based on habitable rooms, not floor area (which is what GVA has used).
- Explains that the original viability assessment was undertaken and the planning applications submitted before the GLA's affordable housing and viability SPG was adopted, and so uses a benchmark land value based on the market value.
- The applicant cannot agree GVA's method that results in a negative site land value and considers that it clearly has a (positive) value.
- Does not agree the contingency should be reduced from 10% to the 5% suggested by GVA.
- Does not agree the level of profit suggested by GVA and consider the scheme to be risky given the circumstances and high costs.

81. For these reasons, the applicant's updated appraisal still shows a negative residual land value for the proposed scheme. The applicant's response will be considered further prior to the Planning Committee meeting.

82. There are some key differences between the proposed scheme across the Solomons Passage site that make it different to a typical redevelopment scheme. Firstly, Wandle bought three buildings in 2012 from the Receiver in good faith that they were of sound construction without expecting structural issues to arise. As the land owner, Wandle has seen the value of its site reduce significantly due to the construction issues making the buildings uninhabitable and in need of costly works to rectify these problems (that occurred for reasons outside the planning system), and need to be resolved by the proposed works being carried out. Also as landlord to the occupants and a registered provider, Wandle needed to rehouse residents and has already purchased additional units off-site on the private market in the borough (as described further below); there is a human side to these applications with many former residents needing to be rehoused and wanting to stay in the Peckham area, and households

wanting to return to the site once work is complete. The sections below describe the off-site provision, and how through a combination of on- and off-site affordable units there would be an increase in affordable housing in the borough.

83. The report for the other current application ref. 17/AP2330 (to replace blocks B and C with a new building) includes information on the provision of additional social rent units on a temporary basis to allow residents to return to the site. This temporary affordable housing would be available only to returning residents for the rest of their lease, and would be additional to the 43 social rent habitable rooms (in perpetuity), and 3 shared ownership units as set out above.

*Off-site affordable housing and combined provision*

84. When it became clear that residents could not remain in the blocks, Wandle undertook to rehouse its residents elsewhere, either for the duration of the construction works to Solomons Passage or permanently. Wandle acquired off-site properties on the private market to rehouse Solomons Passage residents, and provide these off-site properties as affordable housing. Wandle has made a commitment to rehouse the existing occupiers that wish to return to Solomons Passage and undertake the necessary improvements to ensure fit-for-purpose accommodation as soon as possible.
85. As part of rehousing Solomons Passage residents, Wandle acquired 22 properties off-site from the private market and has provided them to Solomons Passage residents as affordable units:
- Four units in Gordon Road, Peckham – Wandle recently built 7 new houses on Gordon Road having obtained planning permission from the council in ref. 13/AP/0955 in 2014. As a development only 7 houses no affordable housing was secured by the planning permission, but as a registered provider Wandle intended 3 to be shared ownership and the remaining 4 would be market units. However, instead of selling the 4 market units, Wandle has made them available to rehouse Solomons Passage residents as social rent units. These 4 houses provide 25 habitable rooms of social rent tenure.
  - Eleven units in the borough were bought on the private market as a mix of houses and flats, and provided as DIYSOs (“do it yourself” shared ownership units) to rehouse Solomons Passage residents.
  - Seven units bought and provided as DIYSOs out of the borough in Lewisham, Bromley, Greenwich and Croydon.
86. The seven out of borough units do not provide affordable housing for Southwark and so have not been included in the calculations below. The 15 off-site units within the borough would be retained by Wandle as additional affordable units. These units off-site have the following tenure split.

Table 7 – off-site housing tenure

<b>Tenure (off site)</b>	<b>Social rent</b> Units (hab rooms)	<b>Shared ownership</b> Units (hab rooms)	<b>Totals</b> Units (hab rooms)
Gordon Road	4 (25)	0 (0)	4 (25)
Other sites in Southwark (DIYSO units)	0 (0)	11 (55)	11 (55)
<b>Total</b>	<b>4 (25)</b>	<b>11 (55)</b>	<b>15 (80)</b>

87. By retaining the recently acquired 15 off-site affordable units (80 hab rooms), and proposing 52 affordable habitable rooms units on-site, this total of 32 affordable units

would represent more units and habitable rooms than the 30 on-site affordable units secured on the 2006 permissions for the Solomons Passage site. There would be net increase of four social rent habitable rooms, and 28 shared ownership habitable rooms in the borough when compared to the 2006 permissions. This is set out in the table below.

Table 8 – comparison of approved affordable housing and proposed affordable housing

<b>Tenure</b>	<b>Social rent</b> Units (hab rooms)	<b>Shared ownership</b> Units (hab rooms)	<b>Totals</b> Units (hab rooms)
2006 permissions	18 (64)	12 (36)	30 (100)
Current proposal (combining on- site and off-site)	18* (68)	14 (64)	32* (132)
<b>Difference</b>	<b>0 (+4)</b>	<b>+2 (+28)</b>	<b>+2 (+32)</b>

*\* Including 14 on-site social rent units as an indicative number of units that can be provided from 43 habitable rooms.*

88. The table above shows, that against a 35% policy requirement of 101 habitable rooms of affordable accommodation for a combined scheme of 288 habitable rooms, the on-site and off-site affordable units together exceed this requirement with 132 habitable rooms of affordable housing proposed.
89. For the special circumstances of:
- the poor construction quality of these young buildings meaning they are uninhabitable and need to be substantially renovated (blocks A and D), and replaced (blocks B and C) with a new building to make the site habitable again; and
  - the off-site units that Wandle has acquired on the private market and made available at affordable levels to rehouse residents from Solomon’s Passage;
  - and because the on- and off-site provision combined lead to a larger number of affordable homes and affordable habitable rooms in the borough when compared with those secured by the 2006 permissions and the 35% affordable housing requirement;

The proposed on-site affordable housing provision is considered to be acceptable in these exceptional circumstances.

*Tenure split*

90. The site is within the Peckham and Nunhead Action Area, where saved policy 4.4 of the Southwark Plan seeks a mix of 30% social rent to 70% intermediate. The combined on-site affordable housing proposed by the two current applications would be 86% social rent to 14% shared ownership by habitable room, i.e. a much higher proportion of social rent than sought by saved policy 4.4 of the Southwark Plan.
91. The applicant has sought to reprovide through a combination of on-site and off-site provision, the same number of affordable units as were approved in the 2006 permission which had a split of 64% social rent to 36% shared ownership. Actually, two additional shared ownership units (with 28 additional habitable rooms) have been provided by Wandle, and 4 additional social rent habitable rooms, so that there is an overall increase in habitable rooms. This result in the total affordable housing

proposed on-site and off-site having a tenure split of 51% social rent to 49% intermediate by habitable room.

92. Overall, the tenure split proposed by both applications is considered acceptable as there are more shared ownership units being proposed off-site than were approved in 2006, which moves the approved tenure split closer to that sought by current policy.

#### *Planning obligation*

93. The legal agreement would secure the three shared ownership units on-site within blocks A and D that are the subject of this application, which as part of the overall development of the Solomon's Passage site. This amount of affordable housing would more than reprovide the affordable housing approved in the 2006 permissions, albeit in a combination of on-site and off-site locations, to ensure there is no net loss of affordable housing in the borough.
94. As the scheme does not provide a policy compliant level of affordable housing, the legal agreement would also secure two viability review mechanisms. An early review would be triggered if the scheme is not implemented within two years. The end review would use the actual costs and revised sales values to assess whether the approved scheme has become more viable from the date of the planning permission. If the viability of the scheme is found to have improved, 50% of the increase in the scheme's value would be paid to the Council as an affordable housing contribution (up to the level that would have been required for a policy compliant scheme of 35% affordable housing). This would be in line with the Development Viability SPD. As the applicant is a registered provider, the obligation should allow for the option of an increased provision of on-site permanent affordable housing being provided to the same value instead of a financial contribution.
95. An annual report from the applicant to confirm the on-site affordable housing provision would be secured by a planning obligation, along with the associated contribution to cover the monitoring fee for the council to record and monitor the on-site affordable housing.

#### *Conclusion on affordable housing*

96. For the exceptional reasons behind the two applications resulting from the poor build quality, and as Wandle has purchased off-site market units to be made available as affordable units in order to rehouse Solomons Passage residents, the proposed quantum of on-site affordable housing is considered to be acceptable. While the on-site provision in blocks A and D is less than that approved in the 2006 permissions, once the off-site units within the borough that Wandle has acquired are also considered, there is an overall increase in affordable housing units and habitable rooms within the borough.
97. Taking the material consideration of the highly unusual reason for needing to change from the approved on-site affordable housing in the 2006 permissions, the proposal is considered to comply with London Plan policies 3.12 and 3.14, Core Strategy policy 6 and saved policy 4.4 of the Southwark Plan.

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

98. When compared with the overlooking from the existing windows, the proposed alterations to these two blocks would not affect the privacy of neighbouring properties. The changes would not change the likely noise and disturbance from the existing residential units to neighbouring residential properties.

99. The proposed alterations to the elevations would slightly increase the dimensions of the existing buildings because of the thickness of the cladding and the new roofs. The submitted daylight and sunlight report considers the impacts of the proposed replacement of blocks B and C to neighbouring properties, and the cumulative impacts of the replacement block and the alterations to blocks A and D.
100. The cumulative assessment of the daylight impacts show that three bedrooms of Aura Court next to block A would experience a noticeable reduction in daylight distribution, which is likely to be due to the changes to block A from the recladding and new roof as well as the proposed new building. These narrow windows appear to serve the main bedroom of each two-bedroom flat; as the other rooms to these flats would not experience a noticeable reduction in daylight nor sunlight, and would retain a good outlook towards the application site and across Peckham Rye, the overall amenity of these units would not be harmed. The changes to block A are considered not to cause harm to amenity of neighbouring properties.
101. Due to the separation distance of 10m provided by the road, and as no. 1-15 Solomons Passage has no windows in its flank elevation and nor does no. 30 Solomons Passage, the alterations to block A would not harm the amenity of properties on the north-western side of Solomons Passage.
102. One bedroom window of Pineapple Cottage would experience a noticeable reduction in VSC, but as the other two windows serving this room would retain good VSC levels and the daylight distribution to the room remains good, this would not cause harm to the amenity of this neighbour. When compared with the existing massing of the block and the proximity of the two buildings, the alterations to block D which increase the height of the front elevation would not cause harm to the amenity of Pineapple Cottage.
103. As all rear windows of nos. 51 to 55 Waveney Avenue pass the VSC and NSL tests, the proposed 20-30cm increase in height of block D along the boundaries with the rear gardens of Waveney Avenue would not cause a noticeable loss of daylight to the rear windows; 14 of the 15 assessed windows would retain annual probable sunlight hours above the minimum recommended in the BRE guidance; one ground floor window to no. 51 would have a decrease in winter hours from seven to four, and so be one hour below the five recommended. This is considered not to cause significant harm to the amenity of this flat.
104. When compared with the existing height and massing of the buildings along the boundaries, and the associated existing overshadowing, the increase in height to both buildings in block D is considered not to have an overbearing impact to the outlook from these neighbouring properties, nor to result in significant additional overshadowing of the rear gardens.
105. Both parts of block D are to the north of Williamson Court and so would not affect the sunlight to the windows or outdoor amenity spaces of Williamson Court. The submitted daylight report shows the changes would not cause a noticeable loss of daylight to the rear windows of Williamson Court. When compared with the existing relationship of the buildings on the boundaries, the increased roof height and parapets to both parts of block D would not be intrusive to the outlook from Williamson Court.

### **Transport and highways**

106. The site has a PTAL of 4, with bus services running along Peckham Rye. The basement car park under blocks B and C would be retained to provide on-site parking.

### Car parking

107. The basement car park shared by all blocks would be altered to revise the existing layout of 62 car parking spaces to 51 spaces (including 5 wheelchair parking spaces), with motorcycle parking and cycle spaces. The parking would continue to serve all four blocks.
108. The allocation of parking spaces between the 87 units in the blocks has not been detailed. While this level of parking provision at 1 space per 0.59 units would not be required on a new redevelopment scheme, as the parking spaces in the basement already exist, with a reduction in number proposed as part of the revised layout, the continued use of the basement for parking is not objected to. A car parking management plan detailing the allocation of parking spaces between the two retained blocks and new building would be required by a planning obligation.

### Cycle parking

109. Block A currently has no dedicated cycle storage. As proposed, a cycle store is to be added in front of block A for 12 cycles, and 5 outdoor stands at the rear for visitors. Block D currently has a cycle store which provides 14 spaces. In the proposed scheme, there would be 22 spaces within a larger cycle store, plus 5 outdoor stands for visitors.
110. While the proposed provision is below the minimum standard, as there would be an improved cycle parking provision for residents and visitors compared with the existing situation for these refurbished blocks, this is considered to be acceptable and a welcomed improvement. Further detail of the appearance of the cycle stores would be conditioned as no elevation drawings have been provided, the additional store in front of block A would be particularly visible in public views, and the existing front store could be improved in its appearance.

### Construction phase

111. An outline construction management plan has been submitted, but requires amendments to address comments from the Highways and Environmental Protection teams, as well as input from the applicant's selected contractor before it would be acceptable. A condition to require a further version for agreement is proposed.

### **Trees and ecology**

112. The submitted bat surveys have been reviewed by the ecology officer, and no further surveys are required. Further details of the bat and bird boxes to be installed would be secured by a condition to ensure this ecological enhancement as part of the works.
113. An arboricultural statement has been provided to show how the street trees can be protected during the construction works. This would be secured by condition. The proposed landscaping improvements would provide ecological enhancements, and a landscaping condition is recommended to require further information on the species to be planted.
114. The front garden area of block A is to be used as the construction compound during the works, which would require the removal of the young trees in this area. These would be replaced by the proposed landscaping and further details would be conditioned, along with information as to the phasing of the landscaping works.

### **Sustainability (including energy, flood risk, drainage and contamination)**



### Contamination

115. The works to blocks A and D would not require groundworks and so do not raise contamination concerns.

### Energy

116. The recladding is likely to improve the thermal performance and air tightness of the two blocks to assist in the “be lean” stage of the energy hierarchy, and meet current Building Regulations.

### BREEAM

117. A preliminary BREEAM pre-assessment report using the Domestic Refurbishment methodology was provided, indicating that the refurbishment could achieve a “very good” rating. A condition is proposed to ensure at least this rating is achieved by requiring the detailed design and construction phases to consider sustainability, given the significant works required to these relatively new buildings.

### Flooding and sustainable drainage

118. The site is within flood zone 1 and so has a low probability of flooding from rivers. Sustainable drainage measures for the site are limited by the size of the basement car park and the underlying clays. An attenuation tank (102 cubic metres) is proposed in the garden area in front of block A to slow run off water across the whole development. Compliance with the submitted flood risk assessment and drainage statement would be secured by a condition.

### **Planning obligations and Community Infrastructure Levy**

119. The recladding of these blocks does not by itself trigger the requirement for any mitigation to be secured through a planning obligation, however the changes to the tenure of these two blocks to be completely private housing is an amendment to the original section 106 agreements for these two blocks. As the two blocks would use the basement car parking they need to be provided for and be tied into the car park management plan. A new legal agreement is therefore required, and consideration will be given as to whether one legal agreement to cover both planning application is the most appropriate mechanism given the two applications cover the same site and have the same applicant. These obligations are necessary to make the development acceptable in planning terms. An update will be provided on the items listed as “under discussion”:

<b>Planning obligation</b>	<b>Mitigation</b>	<b>Applicant's position</b>
Affordable housing	Provision of 3 shared ownership affordable units to be provided on site: <ul style="list-style-type: none"><li>• 3 identified units (9 hab rooms) as shared ownership tenure units.</li></ul> Income thresholds and eligibility criteria for this tenure would be included.	Agreed – returning shared ownership residents would have their original income and eligibility criteria
Affordable housing viability review	Viability review if the scheme is not implemented within two years of the permission.	Under discussion

	Viability review of the actual construction costs and sales values prior to more than 25% occupation. If the scheme is found to be viable then either on-site provision should be made or an off-site contribution.	
<b>Planning obligation</b>	<b>Mitigation</b>	<b>Applicant's position</b>
Car parking management plan	A car parking management plan for the basement car park, for example detailing the management off the off-street parking bays, their allocation between the blocks, tenures and wheelchair units.	Agreed
Monitoring fee	Payment of £1,500 for the monitoring of the affordable units and requirement for an annual monitoring report to be submitted.	Under discussion

120. The proposed refurbishment and recladding of blocks A and D does not increase the number of units, nor new build floorspace. It is therefore not liable for Mayoral or Southwark Community Infrastructure Levy.
121. In the event that a satisfactory legal agreement has not been entered into by 28 September 2018 it is recommended that the Director of Planning (if appropriate) refuses planning permission for the following reason:

*“The proposal, by failing to provide an appropriate mechanism for securing affordable housing delivery, and the allocation and management of the off-street parking bays, fails to demonstrate conformity with strategic planning policies of 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 guidance in the council's Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015).”*

#### **Other matters**

122. None

#### **Conclusion on planning issues**

123. The exceptional reasons for the substantial works needed to these two recently constructed buildings are understood. The proposed works would result in a better appearance of these two blocks, and improved quality living accommodation of these units to allow them to be re-occupied. The proposed external alterations and resulting limited increases in height and massing are considered not to cause significant harm to the amenity of surrounding residential properties. Parts of the proposal include improving the cycle parking, landscaping and ecological features as further benefits.
124. As well as the physical works, the proposal would change the tenure of the approved blocks with the loss of the affordable housing units secured in the 2006 permission. The loss of affordable housing provision on this site in this application has been considered along with the loss of affordable housing proposed in current application ref. 17/AP/2330 with the redevelopment of blocks B and C. Together the two applications result in a loss of social rent units (four units or 21 habitable rooms) and a loss of shared ownership units on site (a reduction of nine shared ownership units as 27 habitable rooms) when compared to the 2006 permissions. However Wandle has provided four social rent units in its Gordon Road development (that were due to be

sold on the open market) and purchased eleven properties (55 habitable rooms) off-site on the open market and provided these as shared ownership tenure to relocated residents. This off-site provision more than offsets the under provision on-site. Due to the specific and extremely unusual reasons for the refurbishment and redevelopment of this site, and the off-site provision, the changes to the on-site tenure are considered to be acceptable.

125. Subject to the proposed conditions set out below and the completion of a section 106 agreement to secure the obligations set out above (regarding affordable housing and car parking allocations), the application is recommended for approval.

### **Community impact statement**

126. 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**

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

### **Consultation replies**

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

#### Summary of consultation responses

129. Three objections received with the following summarised comments:

130. Objection: The proposal does not fit in with the local character.

Officer response: The proposed changes to the elevations of these blocks are considered to improve their appearance, in an area with a variety of designs, ages and heights of buildings.

131. Objection: Additional height of the parapet will cause a loss of light to neighbours on Waveney Avenue.

Officer response: The increase in massing would not cause a noticeable reduction in daylight or sunlight to windows, nor to the gardens of the Waveney Avenue properties.

132. Objection: Works to block D's parapet are on a party wall with Waveney Avenue properties. All previous undertakings are being broken: residents were previously promised that the new party wall would be no higher than the original with no overhang and no rainwater into the gardens of Waveney Avenue. Difficult to see the detail on the application drawings and an impact assessment is needed.

Officer response: Party wall matters are a civil issue between land owners and are not a material consideration for a planning application. For the reasons set out above in the assessment section, the proposal is considered to have an acceptable impact on neighbour amenity.

133. Objection: The additional storey will cause a loss of neighbour amenity to Williamson Court. The massing and layout of the new development does not respect that of adjacent housing and safeguard the privacy of existing residents.

Officer response: This application does not propose an additional storey; this objection seems to relate the redevelopment of blocks B and C proposed by the other current application.

134. Objection: Detrimental effect and inconvenience for existing residents. Stress from the building works. No mention of compensation for the inconvenience the building works will cause, so soon after the original build.

Officer response: A construction environment management plan would be required by a suggested condition to try to minimise disruption to local residents. Whether local residents are entitled to compensation for the disruption is not a material planning consideration.

135. Objection: This time there has been no consultation until the planning application letters were received. Lack of consultation on the application. Poor online process for submitting objections as the system times out.

Officer response: There is no legal requirement for an applicant to undertake pre-application consultation with the local community. This planning application was advertised by 231 letters to surrounding properties, site notices and newspapers adverts so the council has exceeded the statutory requirements. While it is disappointing to hear the council's online comment facility timed out and a neighbour's objection comment was lost, the objector submitted a fresh online comment.

136. Ecology Officer – The bat surveys are fine no bats were recorded roosting, commuting or foraging on the site. No further surveys are required.

137. Environmental Protection Team – recommend conditions regarding internal noise levels, vibration, boiler emissions and plant noise.

### **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 an improved design and better quality housing on this site. 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/2614-159 Application file: 17/AP/2326 Southwark Local Development Framework and Development Plan Documents	Chief Executive's Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 020 7525 1412 Council website: www.southwark.gov.uk

## APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Recommendation

## AUDIT TRAIL

<b>Lead Officer</b>	Simon Bevan, Director of Planning	
<b>Report Author</b>	Victoria Crosby, Senior Planner	
<b>Version</b>	Final	
<b>Dated</b>	17 May 2018	
<b>Key Decision</b>	No	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / EXECUTIVE MEMBER</b>		
<b>Officer Title</b>	<b>Comments Sought</b>	<b>Comments included</b>
Strategic Director of Finance and Governance	No	No
Strategic Director of Environment and Social Regeneration	No	No
Strategic Director of Housing and Modernisation	No	No
Director of Regeneration	No	No
<b>Date final report sent to Constitutional Team</b>	17 May 2018	

# APPENDIX 1

## Consultation undertaken

**Site notice date:** 10/07/2017

**Press notice date:** 29/06/2017

**Case officer site visit date:** 10/07/2017

**Neighbour consultation letters sent:** 10/07/2017

### Internal services consulted:

Ecology Officer  
Environmental Protection Team Formal Consultation [Noise / Air Quality / Land Contamination / Ventilation]

### Statutory and non-statutory organisations consulted:

n/a

### Neighbour and local groups consulted:

Flat 21 46 Solomons Passage SE15 3DN	37 Solomons Passage London SE15 3UH
Flat 20 46 Solomons Passage SE15 3DN	36 Solomons Passage London SE15 3UH
Flat 19 46 Solomons Passage SE15 3DN	Flat 12 44 Solomons Passage SE15 3DJ
Flat 22 46 Solomons Passage SE15 3DN	Flat 36 Aura Court SE15 3GW
159 Peckham Rye London SE15 3HX	Flat 35 Aura Court SE15 3GW
Flat 23 46 Solomons Passage SE15 3DN	Flat 34 Aura Court SE15 3GW
Flat 14 46 Solomons Passage SE15 3DN	Flat 37 Aura Court SE15 3GW
Flat 13 46 Solomons Passage SE15 3DN	Flat 40 Aura Court SE15 3GW
Flat 12 46 Solomons Passage SE15 3DN	Flat 39 Aura Court SE15 3GW
Flat 15 46 Solomons Passage SE15 3DN	Flat 38 Aura Court SE15 3GW
Flat 18 46 Solomons Passage SE15 3DN	Flat 29 Aura Court SE15 3GW
Flat 17 46 Solomons Passage SE15 3DN	Flat 28 Aura Court SE15 3GW
Flat 16 46 Solomons Passage SE15 3DN	Flat 27 Aura Court SE15 3GW
11 Somerton Road London SE15 3UG	Flat 30 Aura Court SE15 3GW
12 Solomons Passage London SE15 3UH	Flat 33 Aura Court SE15 3GW
11 Solomons Passage London SE15 3UH	Flat 32 Aura Court SE15 3GW
10 Solomons Passage London SE15 3UH	Flat 31 Aura Court SE15 3GW
13 Solomons Passage London SE15 3UH	Flat 41 Aura Court SE15 3GW
16 Solomons Passage London SE15 3UH	Flat 50 Aura Court SE15 3GW
15 Solomons Passage London SE15 3UH	Flat 49 Aura Court SE15 3GW
14 Solomons Passage London SE15 3UH	Flat 1 Williamson Court SE15 3GY
17 Somerton Road London SE15 3UG	Flat 4 Williamson Court SE15 3GY
15 Somerton Road London SE15 3UG	Flat 3 Williamson Court SE15 3GY
13 Somerton Road London SE15 3UG	Flat 2 Williamson Court SE15 3GY
5 Somerton Road London SE15 3UG	Flat 44 Aura Court SE15 3GW
1 Solomons Passage London SE15 3UH	Flat 43 Aura Court SE15 3GW
9 Somerton Road London SE15 3UG	Flat 42 Aura Court SE15 3GW
7 Somerton Road London SE15 3UG	Flat 45 Aura Court SE15 3GW
Flat 11 46 Solomons Passage SE15 3DN	Flat 48 Aura Court SE15 3GW
Flat 22 44 Solomons Passage SE15 3DJ	Flat 47 Aura Court SE15 3GW
Flat 21 44 Solomons Passage SE15 3DJ	Flat 46 Aura Court SE15 3GW
Flat 20 44 Solomons Passage SE15 3DJ	Flat 26 Aura Court SE15 3GW
Flat 23 44 Solomons Passage SE15 3DJ	Flat 6 Aura Court SE15 3GW
Flat 26 44 Solomons Passage SE15 3DJ	Flat 5 Aura Court SE15 3GW
Flat 25 44 Solomons Passage SE15 3DJ	Flat 4 Aura Court SE15 3GW
Flat 24 44 Solomons Passage SE15 3DJ	Flat 7 Aura Court SE15 3GW
Flat 15 44 Solomons Passage SE15 3DJ	Flat 10 Aura Court SE15 3GW
Flat 14 44 Solomons Passage SE15 3DJ	Flat 9 Aura Court SE15 3GW
Flat 13 44 Solomons Passage SE15 3DJ	Flat 8 Aura Court SE15 3GW
Flat 16 44 Solomons Passage SE15 3DJ	Flat 1 51 Waveney Avenue SE15 3UQ

Flat 19 44 Solomons Passage SE15 3DJ  
Flat 18 44 Solomons Passage SE15 3DJ  
Flat 17 44 Solomons Passage SE15 3DJ  
Flat 27 44 Solomons Passage SE15 3DJ  
Flat 6 46 Solomons Passage SE15 3DN  
Flat 5 46 Solomons Passage SE15 3DN  
Flat 4 46 Solomons Passage SE15 3DN  
Flat 7 46 Solomons Passage SE15 3DN  
Flat 10 46 Solomons Passage SE15 3DN  
Flat 9 46 Solomons Passage SE15 3DN  
Flat 8 46 Solomons Passage SE15 3DN  
Flat 30 44 Solomons Passage SE15 3DJ  
Flat 29 44 Solomons Passage SE15 3DJ  
Flat 28 44 Solomons Passage SE15 3DJ  
Flat 31 44 Solomons Passage SE15 3DJ  
Flat 3 46 Solomons Passage SE15 3DN  
Flat 2 46 Solomons Passage SE15 3DN  
Flat 1 46 Solomons Passage SE15 3DN  
18 Solomons Passage London SE15 3UH  
5a Somerton Road London SE15 3UG  
53 Waveney Avenue London SE15 3UQ  
45a Waveney Avenue London SE15 3UQ  
53a Waveney Avenue London SE15 3UQ  
49a Waveney Avenue London SE15 3UQ  
47a Waveney Avenue London SE15 3UQ  
41 Waveney Avenue London SE15 3UQ  
39 Waveney Avenue London SE15 3UQ  
37 Waveney Avenue London SE15 3UQ  
43 Waveney Avenue London SE15 3UQ  
49 Waveney Avenue London SE15 3UQ  
47 Waveney Avenue London SE15 3UQ  
45 Waveney Avenue London SE15 3UQ  
55a Waveney Avenue London SE15 3UQ  
1 Somerton Road London SE15 3UG  
45 Carden Road London SE15 3UB  
171b Peckham Rye London SE15 3HZ  
3 Somerton Road London SE15 3UG  
Ground Floor Flat 47 Carden Road SE15 3UB  
First Floor And Second Floor Flat 47 Carden Road SE15 3UB  
Top Flat 171 Peckham Rye SE15 3HZ  
167 Peckham Rye London SE15 3HZ  
165 Peckham Rye London SE15 3HZ  
55b Waveney Avenue London SE15 3UQ  
171a Peckham Rye London SE15 3HZ  
17 Solomons Passage London SE15 3UH  
169 Peckham Rye London SE15 3HZ  
Pineapple Cottage 30a Solomons Passage SE15 3UH  
35 Waveney Avenue London SE15 3UQ  
27 Solomons Passage London SE15 3UH  
26 Solomons Passage London SE15 3UH  
25 Solomons Passage London SE15 3UH  
28 Solomons Passage London SE15 3UH  
30 Solomons Passage London SE15 3UH  
3 Solomons Passage London SE15 3UH  
29 Solomons Passage London SE15 3UH  
20 Solomons Passage London SE15 3UH  
2 Solomons Passage London SE15 3UH  
19 Solomons Passage London SE15 3UH  
21 Solomons Passage London SE15 3UH  
24 Solomons Passage London SE15 3UH  
23 Solomons Passage London SE15 3UH  
22 Solomons Passage London SE15 3UH  
31 Solomons Passage London SE15 3UH  
6 Solomons Passage London SE15 3UH  
5 Solomons Passage London SE15 3UH  
4 Solomons Passage London SE15 3UH  
7 Solomons Passage London SE15 3UH  
33 Waveney Avenue London SE15 3UQ  
9 Solomons Passage London SE15 3UH  
8 Solomons Passage London SE15 3UH  
34 Solomons Passage London SE15 3UH  
33 Solomons Passage London SE15 3UH  
32 Solomons Passage London SE15 3UH  
35 Solomons Passage London SE15 3UH  
38 Solomons Passage London SE15 3UH

Flat 2 51 Waveney Avenue SE15 3UQ  
Flat 3 Aura Court SE15 3GW  
Flat 2 Aura Court SE15 3GW  
Flat 1 Aura Court SE15 3GW  
Flat 11 Aura Court SE15 3GW  
Flat 21 Aura Court SE15 3GW  
Flat 20 Aura Court SE15 3GW  
Flat 19 Aura Court SE15 3GW  
Flat 22 Aura Court SE15 3GW  
Flat 25 Aura Court SE15 3GW  
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Flat 15 Aura Court SE15 3GW  
Flat 18 Aura Court SE15 3GW  
Flat 17 Aura Court SE15 3GW  
Flat 16 Aura Court SE15 3GW  
Flat 5 Williamson Court SE15 3GY  
Flat 9 42 Solomons Passage SE15 3BP  
Flat 8 42 Solomons Passage SE15 3BP  
Flat 7 42 Solomons Passage SE15 3BP  
Flat 10 42 Solomons Passage SE15 3BP  
Flat 13 42 Solomons Passage SE15 3BP  
Flat 12 42 Solomons Passage SE15 3BP  
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Flat 4 42 Solomons Passage SE15 3BP  
Flat 14 42 Solomons Passage SE15 3BP  
Flat 7 44 Solomons Passage SE15 3DJ  
Flat 6 44 Solomons Passage SE15 3DJ  
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Flat 9 44 Solomons Passage SE15 3DJ  
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Flat 18 Williamson Court SE15 3GY  
Flat 17 Williamson Court SE15 3GY  
Flat 8 Williamson Court SE15 3GY  
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Flat 6 Williamson Court SE15 3GY  
Flat 9 Williamson Court SE15 3GY  
Flat 12 Williamson Court SE15 3GY  
Flat 11 Williamson Court SE15 3GY  
Flat 10 Williamson Court SE15 3GY  
Flat 8 40 Solomons Passage SE15 3UH  
Flat 7 40 Solomons Passage SE15 3UH  
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Flat 9 40 Solomons Passage SE15 3UH  
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Flat 11 40 Solomons Passage SE15 3UH  
Flat 10 40 Solomons Passage SE15 3UH  
Flat 1 40 Solomons Passage SE15 3UH  
Flat 2 40 Solomons Passage SE15 3UH  
Flat 5 40 Solomons Passage SE15 3UH  
Flat 4 40 Solomons Passage SE15 3UH  
Flat 3 40 Solomons Passage SE15 3UH  
Flat1, Waveney Avenue Peckham SE15 3UQ

**Re-consultation: n/a**

## APPENDIX 2

### Consultation responses received

#### Internal services

Ecology Officer  
Environmental Protection Team Formal Consultation [Noise / Air Quality / Land Contamination / Ventilation]

#### Statutory and non-statutory organisations

None

#### Neighbours and local groups

Flat 1, Waveney Avenue Peckham SE15 3UQ  
22 Solomons Passage London SE15 3UH  
35 Waveney Avenue London SE15 3UQ