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## RECOMMENDATION

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This document shows the case officer's recommended decision for the application referred to below.  
This document is not a decision notice for this application.

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<b>Applicant</b>	Southwark GP Nominee 1 Limited and Southwark GP Nominee 2 Limited	<b>Reg. Number</b>	17/AP/4088
<b>Application Type</b>	Full Planning Application	<b>Case Number</b>	TP/310-A
<b>Recommendation</b>	Refuse permission		

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### Draft of Decision Notice

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#### Planning Permission was **REFUSED** for the following development:

Full planning permission for demolition, alterations and extension of existing buildings and erection of new buildings comprising a mixed use scheme providing up to 1,217 residential units, up to 3,795 sqm GEA of flexible Class A1/A3/A4 (retail and food and drink uses) floorspace, up to 11,979 sqm GEA of flexible Class B1/B2 (business and industrial) floorspace, up to 896 sqm GEA of flexible Class D1/D2 (community/assembly/leisure) floorspace, and up to 3,882 sqm GEA of multi-use floorspace (A1/A3/A4/D1) and a new/replacement secondary school, in buildings ranging from 4 to 28 storeys in height as well as the creation of a single storey basement. The development also includes a basement parking and servicing area, communal amenity space, landscaping, children's playspace, car and cycle parking, installation of plant, new pedestrian, vehicular and servicing routes, the creation of two new pedestrian routes through the Railway Arches and associated works; and

Outline planning permission (with all matters reserved) for the part demolition and part retention of existing buildings and erection of two new buildings comprising a mixed use scheme providing up to 125 residential units and up to 781 sqm GEA of flexible Class A1/A3/A4/D1/Sui Generis Uses and other associated works.

THE APPLICATION IS ACCOMPANIED BY AN ENVIRONMENTAL STATEMENT submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) regulations 2017. The ES can be viewed on the Council's website. Copies of the ES may be obtained from Ramboll Environ UK Ltd, Artillery House, 11-19 artillery Row, London SW1P 1RT at a charge of £10 (CD).

**At:** TOWER BRIDGE BUSINESS COMPLEX, 100 CLEMENTS ROAD AKA THE BISCUIT FACTORY & BERMONDSEY CAMPUS SITE, KEETONS ROAD LONDON, SE16 4DG

**In accordance with application received on 23/10/2017**

#### **and Applicant's Drawing Nos. Existing Plans**

2607-KPF-MPLN-B1-DR-PLN-A-0065  
 2607-KPF-MPLN-B1-DR-PLN-A-0069  
 2607-KPF-MPLN-00-DR-PLN-A-0070  
 2607-KPF-MPLN-01-DR-PLN-A-0071  
 2607-KPF-MPLN-02-DR-PLN-A-0072  
 2607-KPF-MPLN-03-DR-PLN-A-0073  
 2607-KPF-MPLN-04-DR-PLN-A-0074  
 2607-KPF-MPLN-05-DR-PLN-A-0075  
 2607-KPF-MPLN-XX-DR-ELE-A-0080  
 2607-KPF-MPLN-XX-DR-SEC-A-0081

#### Proposed - Site Plans

2607-KPF-MPLN-B1-DR-PLN-A-0099  
 2607-KPF-MPLN-00-DR-PLN-A-0100\_B  
 2607-KPF-MPLN-XX-DR-PLN-A-0140\_B  
 2607-KPF-MPLN-RF-DR-PLN-A-0150\_B

#### Proposed Building BC-6

2607-CVA-BC01-00-DR-PLN-A-0100\_A  
 2607-CVA-BC01-XX-DR-PLN-A-0101\_A  
 2607-CVA-BC01-XX-DR-PLN-A-0102\_A  
 2607-CVA-BC01-XX-DR-PLN-A-0103\_A

2607-CVA-BC01-XX-DR-PLN-A-0104\_A  
2607-CVA-BC01-XX-DR-ELE-A-0201  
2607-CVA-BC01-XX-DR-ELE-A-0301\_A  
2607-CVA-BC01-XX-DR-ELE-A-0302\_A  
2607-CVA-BC01-XX-DR-ELE-A-0303\_A  
2607-CVA-BC01-XX-DR-SEC-A-0304\_A  
2607-CVA-BC01-XX-DR-DET-A-0401\_A  
2607-CVA-BC01-XX-DR-DET-A-0402\_A  
2607-CVA-BC01-XX-DR-DET-A-0403\_A

Proposed Building BC-5

2607-KPF-BC02-00-DR-PLN-A-0100\_A  
2607-KPF-BC02-0M-DR-PLN-A-0101\_A  
2607-KPF-BC02-02-DR-PLN-A-0103\_A  
2607-KPF-BC02-04-DR-PLN-A-0105  
2607-KPF-BC02-XX-DR-ELE-A-0201  
2607-KPF-BC02-XX-DR-ELE-A-0202  
2607-KPF-BC02-XX-DR-SEC-A-0250  
2607-KPF-BC02-XX-DR-DET-A-0301

Proposed Building BC-1234

2607-KPF-BC03-00-DR-PLN-A-0100\_B  
2607-KPF-BC03-0M-DR-PLN-A-0101\_A  
2607-KPF-BC03-01-DR-PLN-A-0102\_B  
2607-KPF-BC03-02-DR-PLN-A-0103\_B  
2607-KPF-BC03-03-DR-PLN-A-0104\_B  
2607-KPF-BC03-04-DR-PLN-A-0105\_A  
2607-KPF-BC03-05-DR-PLN-A-0106\_A  
2607-KPF-BC03-06-DR-PLN-A-0107\_A  
2607-KPF-BC03-07-DR-PLN-A-0108  
2607-KPF-BC03-08-DR-PLN-A-0109  
2607-KPF-BC03-09-DR-PLN-A-0110  
2607-KPF-BC03-RF-DR-PLN-A-0111\_A  
2607-KPF-BC03-XX-DR-ELE-A-0201\_B  
2607-KPF-BC03-XX-DR-ELE-A-0202\_B  
2607-KPF-BC03-XX-DR-ELE-A-0203\_B  
2607-KPF-BC03-XX-DR-ELE-A-0204\_B  
2607-KPF-BC03-XX-DR-ELE-A-0205\_B  
2607-KPF-BC03-XX-DR-ELE-A-0206\_B  
2607-KPF-BC03-XX-DR-SEC-A-0250\_A  
2607-KPF-BC03-XX-DR-SEC-A-0251\_B  
2607-KPF-BC03-XX-DR-DET-A-0301\_B

Proposed Building BF-D&E

2607-KPF-BF01-00-DR-PLN-A-0100\_A  
2607-KPF-BF01-01-DR-PLN-A-0102  
2607-KPF-BF01-02-DR-PLN-A-0103  
2607-KPF-BF01-03-DR-PLN-A-0104\_A  
2607-KPF-BF01-04-DR-PLN-A-0105\_A  
2608-KPF-BF02-05-DR-PLN-A-0106\_A  
2607-KPF-BF01-06-DR-PLN-A-0107\_A  
2607-KPF-BF01-07-DR-PLN-A-0108\_A  
2607-KPF-BF01-12-DR-PLN-A-0113  
2608-KPF-BF01-13-DR-PLN-A-0114  
2607-KPF-BF01-15-DR-PLN-A-0116  
2607-KPF-BF01-XX-DR-ELE-A-0201\_A  
2607-KPF-BF01-XX-DR-ELE-A-0202\_A  
2607-KPF-BF01-XX-DR-ELE-A-0203\_B  
2607-KPF-BF01-XX-DR-ELE-A-0204\_A  
2607-KPF-BF01-XX-DR-SEC-A-0250  
2607-KPF-BF01-XX-DR-SEC-A-0251  
2607-KPF-BF01-XX-DR-DET-A-0301\_A

Proposed Building BF-F

2607-KPF-BF02-00-DR-PLN-A-0100\_A  
2607-KPF-BF02-0M-DR-PLN-A-0101  
2607-KPF-BF02-01-DR-PLN-A-0102  
2607-KPF-BF02-02-DR-PLN-A-0103\_A  
2607-KPF-BF02-03-DR-PLN-A-0104\_A  
2607-KPF-BF02-04-DR-PLN-A-0105\_A  
2607-KPF-BF02-05-DR-PLN-A-0106\_A  
2607-KPF-BF02-06-DR-PLN-A-0107\_A  
2607-KPF-BF02-07-DR-PLN-A-0108\_A  
2607-KPF-BF02-08-DR-PLN-A-0109  
2607-KPF-BF02-09-DR-PLN-A-0110  
2607-KPF-BF02-XX-DR-ELE-A-0201  
2607-KPF-BF02-XX-DR-ELE-A-0202  
2607-KPF-BF02-XX-DR-ELE-A-0203\_A  
2607-KPF-BF02-XX-DR-ELE-A-0204  
2607-KPF-BF02-XX-DR-ELE-A-0205  
2607-KPF-BF02-XX-DR-ELE-A-0206\_A  
2607-KPF-BF02-XX-DR-ELE-A-0207  
2607-KPF-BF02-XX-DR-SEC-A-0250  
2607-KPF-BF02-XX-DR-SEC-A-0251  
2607-KPF-BF02-XX-DR-DET-A-0301

Proposed Buildings BF-OQ and P

2607-KPF-BF03-00-DR-PLN-A-0100\_B  
2607-KPF-BF03-01-DR-PLN-A-0101\_A  
2607-KPF-BF03-05-DR-PLN-A-0105\_A  
2607-KPF-BF03-06-DR-PLN-A-0106\_B  
2607-KPF-BF03-07-DR-PLN-A-0107\_B  
2607-KPF-BF03-08-DR-PLN-A-0108\_B  
2607-KPF-BF03-09-DR-PLN-A-0109\_B  
2607-KPF-BF03-14-DR-PLN-A-0113\_B  
2607-KPF-BF03-XX-DR-ELE-A-0201\_A  
2607-KPF-BF03-XX-DR-ELE-A-0202\_B  
2607-KPF-BF03-XX-DR-ELE-A-0203\_B  
2607-KPF-BF03-XX-DR-ELE-A-0204\_A  
2607-KPF-BF03-XX-DR-ELE-A-0205\_B  
2607-KPF-BF03-XX-DR-ELE-A-0206\_A  
2607-KPF-BF03-XX-DR-ELE-A-0207\_B  
2607-KPF-BF03-XX-DR-ELE-A-0208\_A  
2607-KPF-BF03-XX-DR-ELE-A-0209\_B  
2607-KPF-BF03-XX-DR-ELE-A-0210\_A  
2607-KPF-BF03-XX-DR-ELE-A-0211\_A  
2607-KPF-BF03-XX-DR-SEC-A-0250\_A  
2607-KPF-BF03-XX-DR-SEC-A-0251\_B  
2607-KPF-BF03-XX-DR-DET-A-0301\_A

Proposed Building BF-RST

2607-KPF-BF04-B1-DR-PLN-A-0099  
2607-KPF-BF04-00-DR-PLN-A-0100\_A  
2607-KPF-BF04-0M-DR-PLN-A-0101  
2607-KPF-BF04-01-DR-PLN-A-0102\_B  
2607-KPF-BF04-02-DR-PLN-A-0103\_B  
2607-KPF-BF04-03-DR-PLN-A-0104\_B  
2607-KPF-BF04-04-DR-PLN-A-0105-B  
2607-KPF-BF04-05-DR-PLN-A-0106\_B  
2607-KPF-BF04-06-DR-PLN-A-0107\_B  
2607-KPF-BF04-07-DR-PLN-A-0108\_B  
2607-KPF-BF04-08-DR-PLN-A-0109\_B  
2607-KPF-BF04-09-DR-PLN-A-0110\_B  
2607-KPF-BF04-10-DR-PLN-A-0111\_B  
2607-KPF-BF04-14-DR-PLN-A-0115\_B  
2608-KPF-BF04-15-DR-PLN-A-0116\_B  
2609-KPF-BF04-16-DR-PLN-A-0117\_B  
2607-KPF-BF04-17-DR-PLN-A-0118\_B  
2607-KPF-BF04-17-DR-PLN-A-0119\_B  
2607-KPF-BF04-19-DR-PLN-A-0120\_B

2607-KPF-MPLN-20-DR-PLN-A-0121\_B  
2607-KPF-BF04-21-DR-PLN-A-0122\_B  
2607-KPF-BF04-22-DR-PLN-A-0123\_B  
2608-KPF-BF05-23-DR-PLN-A-0124\_B  
2607-KPF-BF04-24-DR-PLN-A-0125\_B  
2608-KPF-BF04-25-DR-PLN-A-0126\_B  
2607-KPF-BF04-26-DR-PLN-A-0127\_B  
2607-KPF-BF04-27-DR-PLN-A-0128\_A  
2607-KPF-BF04-RF-DR-PLN-A-0129\_A  
2607-KPF-BF04-XX-DR-ELE-A-0201\_B  
2607-KPF-BF04-XX-DR-ELE-A-0202\_B  
2607-KPF-BF04-XX-DR-ELE-A-0203\_B  
2607-KPF-BF04-XX-DR-ELE-A-0204\_B  
2597-KPF-BF04-XX-DR-SEC-A-0250  
2607-KPF-BF04-XX-DR-SEC-A-0251  
2607-KPF-BF04-XX-DR-DET-A-0301

#### Proposed Buildings BF-U & BF-V (parameter plans)

2607-KPF-BF06-XX-DR-PLN-A-0012\_A  
2607-KPF-BF06-XX-DR-PLN-A-0013\_A  
2607-KPF-BF06-XX-DR-PLN-A-0014\_A  
2607-KPF-BF06-XX-DR-PLN-A-0015\_A  
2607-KPF-BF06-XX-DR-PLN-A-0016\_A  
2607-KPF-BF06-XX-DR-PLN-A-0017\_A  
2607-KPF-BF06-XX-DR-PLN-A-0018\_A  
2607-KPF-BF06-XX-DR-PLN-A-0019\_A

#### Proposed Building BF-W

2607-KPF-BF07-00-DR-PLN-A-0100\_B  
2607-KPF-BF07-0M-DR-PLN-A-0101\_B  
2607-KPF-BF07-12-DR-PLN-A-0103\_A  
2607-KPF-BF07-RF-DR-PLN-A-0113\_A  
2607-KPF-BF07-XX-DR-ELE-A-0201\_A  
2607-KPF-BF07-XX-DR-ELE-A-0202\_A  
2607-KPF-BF07-XX-DR-ELE-A-0203\_A  
2607-KPF-BF07-XX-DR-SEC-A-0250\_A  
2607-KPF-BF07-XX-DR-SEC-A-0251\_A  
2607-KPF-BF07-XX-DR-DET-A-0301\_A

#### Phasing

2607-KPF-MPLN-XX-DR-PLN-A-0010  
2607-KPF-MPLN-XX-DR-PLN-A-0011\_B  
2607-KPF-MPLN-XX-DR-PLN-A-0015  
2607-KPF-MPLN-XX-DR-PLN-A-0016  
2607-KPF-MPLN-XX-DR-PLN-A-0017  
2607-KPF-MPLN-XX-DR-PLN-A-0018  
2607-KPF-MPLN-XX-DR-PLN-A-0019  
2607-KPF-MPLN-XX-DR-PLN-A-0020

#### Landscape Plans

LA-DR-100-P04  
LA-DR-101-P04  
LA-DR-102-P04  
LA-DR-103-P04  
LA-DR-104-P04  
LA-DR-105-P04  
LA-DR-106-P04  
LA-DR-107-P04  
LA-DR-108-P04  
LA-DR-109-P04  
LA-DR-110-P04  
LA-DR-111-P04

#### Documents

Planning Statement by Gerald Eve dated 23/10/17  
Design and Access Statement Volume 1 by Kohn Pedersen Fox dated October 2017  
Design and Access Statement Volume 2 by Kohn Pedersen Fox dated October 2017

Addendum to the Design and Access Statement by Kohn Pedersen Fox dated 04.06.2018  
 Design Guidelines by Kohn Pedersen Fox dated October 2017  
 Environmental Statement Volume 1 by Ramboll Environ dated October 2017  
 Environmental Statement Volume 2 - Townscape and Visual and Built Heritage Assessment by Kohn Pedersen Fox, Cottrell and Vermeulen Architecture, Tavernor Consultancy, Ramboll Environ and Miller O'Hare Limited dated October 2017  
 Environmental Statement Volume 3a Technical Appendix dated October 2017  
 Environmental Statement Volume 3b Transport Assessment dated October 2017  
 Transport Assessment by WSP dated October 2017  
 Addendum to the Transport Assessment by WSP dated 04.06.18  
 Daylight and Sunlight Assessment by GIA dated October 2017  
 Daylight and Sunlight Executive Summary by GIA dated October 2017  
 Addendum to the Daylight and Sunlight Assessment dated 04.06.18  
 Internal Daylight, Sunlight and Overshadowing Report by GIA dated October 2017  
 Draft Construction Management Plan dated October 2017  
 Financial Viability Assessment - Executive Summary by DS2 dated October 2017  
 Affordable Housing Statement by DS2 dated October 2017  
 Energy Assessment by ARUP dated October 2017  
 Sustainability Statement by Tuffin Ferraby Taylor Dated October 2017  
 Acoustic Planning Report by Hilson Moran dated October 2017  
 Basement Impact Assessment by WSP dated October 2017  
 Structural Impact Assessment by AKT II and WSP dated October 2017  
 Waste Management Strategy by WSP dated October 2017  
 Retail and Leisure Assessment by Quod dated October 2017  
 Health Impact Assessment by Ramboll Environ dated October 2017  
 Equalities Statement by Quod dated October 2017  
 Local Legacy Strategy by Grosvenor dated October 2017  
 Utilities Statement by ARUP dated October 2017  
 Revised Arboricultural Impact Assessment dated 04.06.18  
 Statement of EIA Conformity dated 04.06.18  
 Statement of Community Involvement by Grosvenor Dated October 2017

**Reason for refusal:**

- 1 The development fails to provide the maximum reasonable amount of affordable housing, and the affordable housing offered would be at a cost which would not be affordable to those in greatest housing need. As such, the development does not maximise the delivery of affordable housing as required by saved Southwark Plan policy 4.4 'Affordable housing', Core Strategy policy SP6 'Housing for people on different incomes' and London Plan policy 3.12 'Negotiating affordable housing on individual private residential developments', or the Mayors Affordable Housing and Viability SPD 2017. In addition, the development does not comply with the specific requirements for Private Rented Housing set out in the submission version (2018) of the New Southwark Plan policy P4 'Private rented homes' in terms of the tenure split or the period for which the PRS housing is secured, or with the draft new London Plan 2017 policy H13 'Build to Rent' in terms of the type of DMR homes being offered. As such, the development would fail to offer genuinely affordable housing to meet a recognised and acute housing need.
- 2 The development is above the density range for an urban area set out in Saved Southwark Plan policy 4.1 'Density of residential development' and London Plan policy 3.4 'Optimising housing potential', but does not provide an exemplary quality of accommodation for its future residents to combat the potential negative impacts of high density living. Specifically, the development provides a high proportion of single aspect dwellings, including dwellings which have a northerly aspect, or a constrained outlook, and dwellings with the sole aspect towards a large railway viaduct so subject to noise and overheating. A significant proportion of flats also do not have access to private amenity space. The qualitative aspects of the housing design would not meet the expectations of the draft London Plan 2017 policies D4 'Housing Quality and Standards' and D6 'Optimising housing density' as well as the standards for amenity space and aspect contained in Saved Southwark Plan (2007) policy 4.2 'Residential Quality' and the Southwark Residential Design Standards SPD 2015. As such, the development would not provide a suitably high quality of residential amenity for future occupiers, and increase the likelihood of use of mechanical heating, cooling and ventilation due to the aspect and need to mitigate noise and overheating.
- 3 The 'blind spots', convoluted and illogical internal routes proposed for pedestrians/cyclists and motorised vehicles would exacerbate pedestrian-vehicle and vehicular conflict and subsequently create adverse impact on highway safety, contrary to the Saved Southwark Plan 2007 Policies 5.2 'Transport impacts' part ii and 5.3 'Walking and cycling' parts i and ii, Strategic Policy 2 'Sustainable transport' of the Core Strategy 2011 plus New Southwark Plan 2018 Policies P11 'Design of places' parts 1.5 and 1.7, P47 'Highways impacts' part 4 and P48 'Walking' part 3.
- 4 In the absence of a clear agreement with the owners of the arch spaces, the proposed development would not

secure the delivery of the two pedestrian routes through the viaduct which are a requirement of site designation NSP10 of the Submission Version of the New Southwark Plan.

**Statement of positive and proactive action in dealing with the application**

The Council has published its development plan and core strategy on its website together with advice about how applications are considered and the information that needs to be submitted to ensure timely consideration of an application. Applicants are advised that planning law requires applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

The pre-application service was used for this application and the advice given has been followed in part however there were outstanding issues with the proposals as submitted. During the course of the application the applicant submitted additional amendments in an attempt to address the outstanding concerns however these were not sufficient to make the proposal acceptable.

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