

<b>Item No.</b> 6.1	<b>Classification:</b> Open	<b>Date:</b> 3 June 2019	<b>Meeting Name:</b> Planning Committee
<b>Report title:</b>	<p><b>Development Management planning application:</b> Application 17/AP/2773 for: Full &amp; Outline Planning Permission</p> <p><b>Address:</b> MALT STREET REGENERATION SITE, LAND BOUNDED BY BIANCA ROAD, LATONA ROAD, HAYMERLE ROAD, FRENHAM STREET AND MALT STREET, LONDON SE1</p> <p><b>Proposal:</b></p> <p>Hybrid application comprising a full planning application for Phase 1 (the “Detailed Component”) and outline planning permission (the “Outline Component”) for Phases 2 &amp; 3:</p> <p><u>Detailed Component (Phase 1):</u></p> <p>Full planning permission for the demolition of existing buildings and structures and redevelopment of the central area for the erection of a total of 4 buildings, two at 7 storeys (Buildings B9&amp;B12), one at 15 storeys (Building B10), and one at 44 storeys (Building B4) (max height 147.12m AOD) to provide 420 homes, 1,197 sqm GEA of Class B1(c) floorspace and 785 sqm GEA of non-residential floor space within classes A1-A4 (retail), Class B1 (business) and Class D1 (public services) and D2 (entertainment and leisure) use, an energy centre (750 sqm) and new public open space and public realm with on street and basement car parking spaces and cycle spaces.</p> <p><u>Outline Component (Phase 2 &amp; 3):</u></p> <p>Outline planning permission (scale, layout, landscaping, access and appearance reserved) for the demolition of existing buildings and structures and the erection of a seven buildings (B1, B2, B3, B5, B6, B7, B11) ranging in height from 5 to 39 storeys (max height 132.9m AOD) to provide up to 88,052sqm floorspace GEA, comprising up to 880 residential units, up to 3,316 sqm GEA of Class B1(c) floorspace and up to 1,702sqm GEA of non-residential floor space within Classes A1-A4 (retail), Class B1 (business), Class D1 (public services) and D2 (entertainment and leisure) use and car parking spaces at ground level and cycle spaces, with associated new open space, public realm, car parking and associated works.</p> <p>Totals: Up to 1,300 homes and up to 7,000sqm commercial floorspace.</p> <p>(This application represents a departure from strategic policy 10 'Jobs and businesses' of the Core Strategy (2011) and saved policy 1.2 'strategic and local preferred industrial locations' of the Southwark Plan (2007) by virtue of proposing to introduce residential accommodation in a preferred industrial location).</p>		

<b>Ward(s) or groups affected:</b>	Old Kent Road	
<b>From:</b>	DIRECTOR OF PLANNING	
<b>Application Start Date</b>	25/08/2017	<b>Application Expiry Date</b> 15/12/2017
<b>Earliest Decision Date</b>	28/09/2017	<b>PPA application</b>

## RECOMMENDATION

1. a) That planning permission be granted, subject to conditions and referral to the Mayor of London, referral to the Secretary of State and the applicant entering into an appropriate legal agreement by no later than 3 December 2019.
- b) That the environmental information be taken into account as required by Regulation 30 of the Town and Country Planning (Environmental Impact Assessments) Regulations 2017.
- c) That following issue of the decision it be confirmed that the Director of Planning shall place a statement on the Statutory Register pursuant to Regulation 30 of the Town and Country Planning (Environmental Impact Assessments) Regulations and that for the purposes of Regulation 30(1)(d) the main reasons and considerations on which the Local Planning Authority's decision is based shall be set out as in this report.
- d) In the event that the requirements of (a) are not met by 3 December 2019 that the Director of Planning be authorised to refuse planning permission, if appropriate, for the reasons set out at paragraph 480 of this report.

## EXECUTIVE SUMMARY

2. The proposal comprises the comprehensive redevelopment of Malt Street regeneration site. The site measures approximately 2.31ha and is currently occupied for storage purposes and by Travis Perkins as a builders merchant.
3. The submitted application is a "hybrid" application with full planning permission sought for part of the development (the "Detailed Component") with the remaining aspects in Outline form (the "Outline Component"). The development would be a three phase development.
4. Following the redevelopment, up to 1,300 new homes would be provided, which would contribute to helping the borough meet its housing need. The applicant has committed to providing 40% affordable housing overall measured by habitable rooms, which at 35% would deliver 25% social rented homes and 10% intermediate with an additional 5% as intermediate housing. Overall, up to 520 affordable homes would be provided. The 40% offer represents a significant increase over the 25% originally offered. In the Detailed Component, 83 new social rented homes and 48 intermediate homes would be delivered.
5. The proposed development would comprise the erection of 11 buildings at heights of ranging from between 5 to 44 storeys, which would be consistent and accordance with the requirements of The London Plan 2016, the Southwark Core Strategy 2011

and Southwark Plan 2007, as well as the draft Old Kent Road Area Action Plan 2017. The buildings would have a clear sense of order, with well articulated forms and elevations of a regular and ordered quality. They would contribute positively to the London skyline, with distinctive and well resolved tops, particularly to the Building B4 tower. Overall, the development would be of a high quality of design. Whilst there would be some harm to views from Glengall Terrace, the former Licensed Victuallers Asylum (Caroline Gardens Conservation Area) and the Surrey Canal Path, officers consider that the harm caused would be less than substantial and would be outweighed by the wider regeneration benefits of the proposals.

6. The proposed development would substantially improve permeability in the wider area. A new east-west connection would be created through the site along the approximate alignment of the former Grand Surrey Canal. A series of north-south connections would cross the Linear Park in locations that would knit the site back into the surrounding urban grain and respond well to pedestrian desire lines.
7. The new homes would offer a good standard of accommodation for future occupiers as well as high quality communal amenity spaces and play spaces for children. Overall, 63.3% of the new homes would be dual aspect which is considered a very good level of compliance. A policy compliant mix of dwellings in the affordable provision would be provided and 10% wheelchair housing would also be provided. There would be a total of 144 flats within Building B4 which would not have any form or private amenity space, however the scheme does include the delivery of a substantial amount of new ground floor public realm and also includes a s.106 financial contribution to off set the shortfall.
8. 4,513sqm of the commercial floorspace would be specifically designed for B1(c) light industrial purposes, and a condition has been included on the draft decision to ensure this. 2,487sqm of other flexible floorspace, for retail, office and community/leisure uses which would provide for a vibrant, mixed use place.
9. 10% affordable B1(c) light industrial floorspace has been secured, which would be used to support existing or new businesses and the legal agreement can specify that this floorspace is offered to Old Kent Road businesses first, to benefit the existing business community. Independent retail has also been secured for a different kind of retail offer.
10. In relation to car parking, the scheme would include 115 car parking spaces (comprising residential, commercial and car club spaces) and accordingly would not be a "car free" scheme. As mitigation, 40% of the car parking spaces would be fitted with electric vehicle charging points to help encourage electric and hybrid vehicles. The development would encourage residents to utilise sustainable modes of transport with the provision of secure cycle parking for all residents and commercial occupiers (2,150 cycle spaces in total). A s106 contribution would be required to improve local bus capacity in advance of the Bakerloo Line Extension.
11. There would be significant impacts on some neighbouring residents in terms of daylight and sunlight however these are considered to be acceptable within the context of the BRE guidelines and the surrounding townscape.
12. The proposed development has been subject to three rounds of consultation. The first receiving 60 objections, the second receiving 13 objections and the third receiving 3 objections. The main concerns raised were around the building heights proposed and the affordable housing offer.

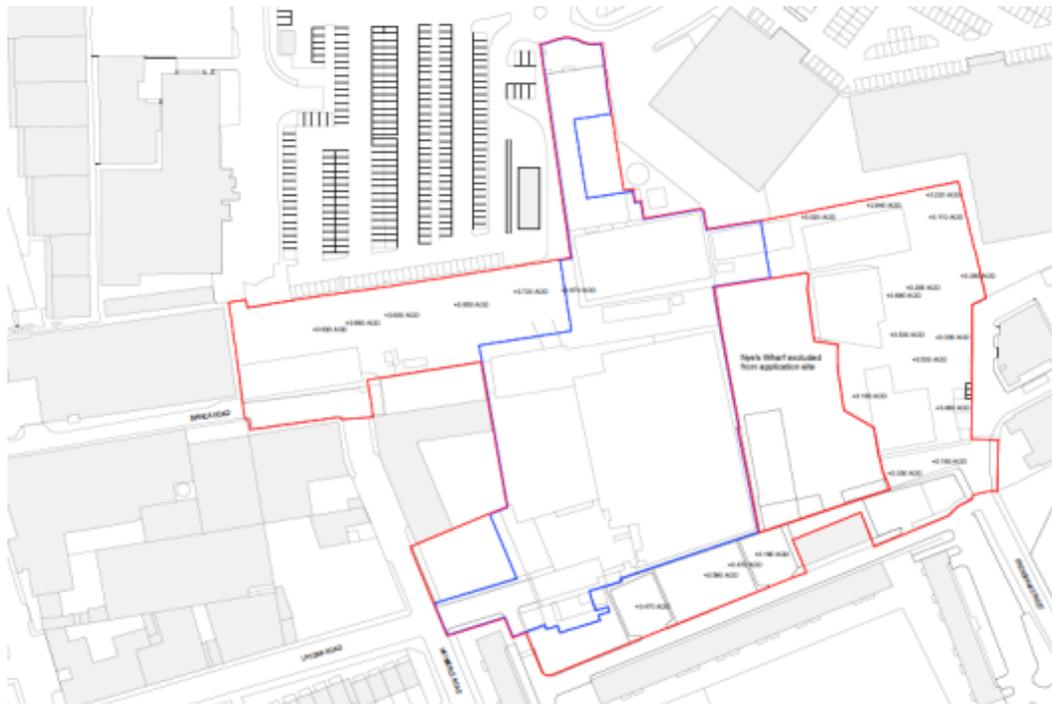
13. The proposal would incorporate measures to reduce its carbon dioxide emissions, and a contribution to the council's carbon off-set green fund would be secured through a s106 agreement. A range of other s106 obligations would be secured, including delivery and management of the park spaces as well as securing public access. A s106 would be collected to off set the shortfall in private open space which could go towards the delivery of the council's Frensham Street Park. Overall, the benefits of the proposal are considered to outweigh the harm caused, and it is recommended that planning permission be granted, subject to conditions and the signing of a S106 agreement and referral to the GLA and Secretary of State.

## **BACKGROUND INFORMATION**

### **Site location and description**

14. The site comprises an irregular shaped piece of land, approximately 2.31 hectares and is currently occupied by warehouse buildings and hardstanding. The site is located on land to the south of Malt Street and north of Latona Road.
15. The site comprises of a series of distinct elements as follows.
16. Bianca Road: This component is located on land bounded by Bianca Road and Haymerle Road to the west. It is currently used as an open storage depot by FM Conway Ltd and has limited employment provision employing approximately 7 staff.
17. Acorn Wharf: This part is located to the east of Bianca Road, accessed from Frensham Street and currently occupied by Travis Perkins who use the site as a builder's merchants. There is also a retail unit which is accessed by members of the public and builders/construction traders. Travis Perkins employ 37 staff.
18. Surrey Wharf: This part of the site is accessed via Malt Street and Olmar Street to the north. It is tenanted for vehicular storage with administrative offices. It comprises a large warehouse with a small four storey building fronting to Malt Street and employs 20 staff.
19. Adopted roads: The redline site plan includes areas of adopted highway on Latona Road at the junction of Haymerle Road and access road to Unwin and Friary Estate; Latona Road at the junction with Frensham Street; Malt Street; and Bianca Road at the junction with Haymerle Road.
20. Car parking and landscaping areas: This parcel of land located at the north of Ednam House on the Unwin and Friary Estate and contains an area of hardstanding for car parking. The applicant does not own this piece of land but has proposed to re-landscape this space in consultation with the local community.

Image: Site plan



21. The site is currently designated as Strategic Industrial Land (SIL) in the London Plan and a Preferred Industrial Location (PIL) in Southwark Council's adopted Core Strategy.
22. The site does not lie within a conservation area and none of the buildings are statutorily listed. The site includes a number of existing trees which are located to the south of the site and along the eastern boundary.

Table: Existing employment

Site parcel	Existing GIA sqm	Yard Area	Use Class
Bianca Road (Open storage)	457	9744	Class B8 storage and distribution
Acorn Wharf (Travis Perkins)	1,152	2611	Class B8/Sui generis
Surrey Wharf (vehicle storage)	2,579	0	Class B8
Total	4,188	12,355	

### The surrounding area

23. The surrounding area is of a mixed character with retail, industrial and storage buildings to the east and west. Space Studios, a three storey building containing studio workspace is located to the west.
24. To the north is the Asda supermarket and its car park as well as the Cantium Retail Park (which Members resolved to grant planning permission for a substantial redevelopment on 5 March 2019). Sandwiched in the middle of the site is the Nye's Wharf site which Members have also resolved to grant planning permission for its redevelopment (on 3 September 2018). Across Latona Road to the south is the Unwin and Friary housing estate which is comprised of residential blocks and the Leyton Square playground. To the south-east is Northfield House, a residential building.
25. The closest residential occupiers are located to the south of the site in the Unwin and Friary Estate.

### **Details of proposal**

26. The application is in a 'hybrid' form, with full planning permission sought for part of the development and the remaining aspects provided in Outline only. The two parts of the application are described in the following paragraphs. Phase 1 has details provided in full ("Detailed Component"), with the Outline for phases 2 and 3 ("Outline Component") being submitted with scale, layout, landscaping, access and appearance matters reserved, but building heights have been confirmed, as set out in paragraph 32 below. The Outline Component is controlled by the parameter plans which dictate the minimum and maximum building parameters.
27. The proposal is for the demolition and redevelopment of the site through the provision of a mixed-use scheme. The proposal would include the provision of up to 1,300 residential units, up to 7,000 sqm of commercial floorspace, a new public Linear Park and a Central Square.
28. The proposal would deliver a minimum of 40% affordable housing across the whole site measured by habitable room which would be comprised of 35% affordable housing with a tenure split of 25% social rent and 10% intermediate plus an additional 5% as intermediate housing. The affordable housing offer represents a substantial increase over the 25% offer originally proposed.
29. In addition, large areas of public realm would be delivered including a new Central Square at the heart of the scheme and a new Linear Park through the site which follows the route of the Grand Surrey Canal which would be capable of delivering a future pedestrian and cycle link between Burgess Park and the Old Kent Road.

Image: Illustrative building plan

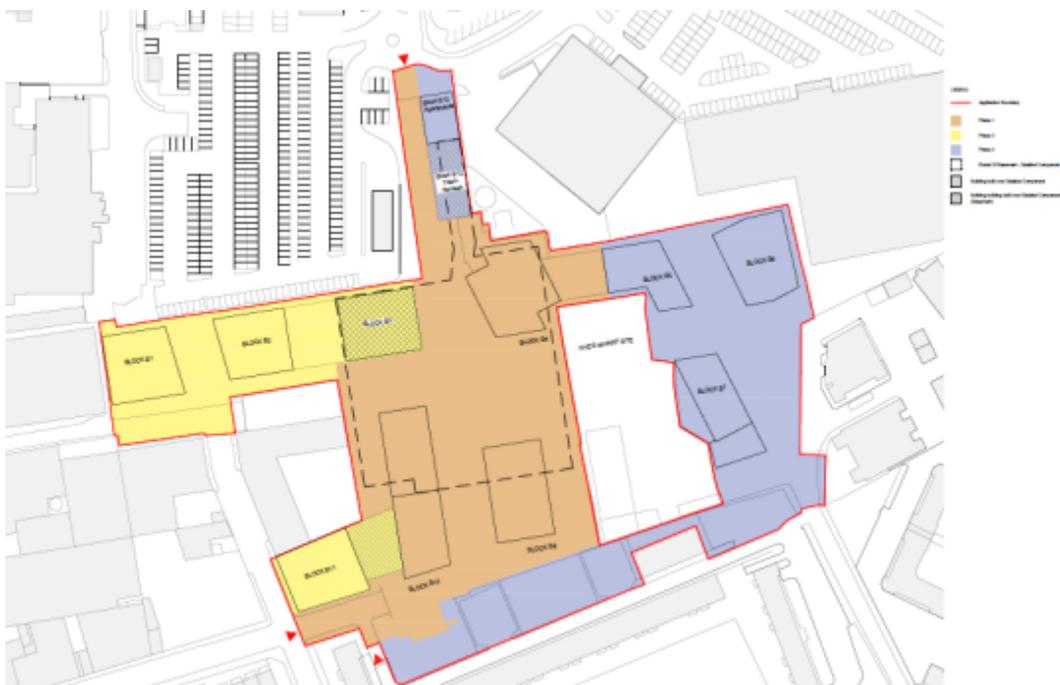


30. In summary, the key elements of the proposed scheme applied for under the planning application include:
- Demolition of all existing structures;
  - Detailed Component – 420 residential dwellings, 1,197 sqm GEA of Class B1(c) floorspace and 785sqm of flexible commercial and employment floorspace (Classes A1 to A4 (retail), B1 (business), D2 and D1 (community/leisure));
  - Outline Component – up to 880 dwellings, up to 3,316 sqm GEA of Class B1(c) floorspace, up to 1,702 sqm of flexible commercial and employment floorspace (Classes A1 to A4 (retail), B1 (business), D2 and D1 (community/leisure)).
31. The proposal would include a total of eight tall buildings including:
- Detailed Component – between 7 and 44 storeys; and
  - Outline Component – up to 35 storeys.
32. The proposed maximum building heights for the proposed buildings would be as follows:
- Outline Component Building B1 (12 storeys, 45.75m AOD);
  - Outline Component Building B2 (15 storeys, 55.55m AOD);
  - Outline Component Building B3 (24 storeys, 83.45m AOD);
  - Detailed Component Building B4 (44 storeys, 147.12m AOD);
  - Outline Component Building B5 (27 storeys, 91.45m AOD);
  - Outline Component Building B6 (35 storeys, 116.55m AOD);
  - Outline Component Building B7 (16 storeys, 58.15m AOD);

- Detailed Component Building B9 (7 storeys, 33.42m AOD);
- Detailed Component Building B10 (8 storeys, 33.92m AOD);
- Outline Component Building B11 (5 storeys, 26.7m AOD);
- Detailed and Outline Component Building B12 (7 storeys, 26.80m AOD).

33. The scheme is proposed to be delivered in three main phases. The Detailed Component would deliver Phase 1 and the Outline Component which would deliver Phases 2 and 3.
34. In total, 115 car spaces would be provided, these comprise of a total of 90 spaces in the basement and 25 spaces at grade level. The spaces at grade level would be located next to Building B10 and Building B11.

Image: Phasing plan



#### Detailed Component Phase 1

35. The detailed phase would comprise of the following:
  - 36.9% affordable housing;
  - Erection of a basement comprising 90 car parking spaces, cycle spaces, energy centre (750sqm) and ancillary plant and servicing area. Entry to the basement would be via a new ramp accessed from Malt Street;
  - Erection of Building (B4) rising to 44 storeys (ground plus 43 floors) with ground floor flexible commercial use (Class A1-A4, B1, D1 and D2) and residential entrance & ancillary areas and residential use (Class C3) on the upper floors. To the rear of Building B4 would be a service yard which would principally service the commercial uses on the ground floor;
  - Erection of Building (B9) rising to 7 storeys (ground plus 6 floors) with ground floor flexible commercial use (Class A1-A4, B1, D1 and D2), residential entrance & ancillary areas and residential use (shared ownership) on the upper floors.

- Erection of Building (B10) rising to 15 storeys (ground plus 14 floors) with ground floor and first floor employment space (Class B1(c)), residential entrances & ancillary areas and residential use (social rented units) on the upper floors. To the rear of Building B10 would be a partially covered service yard which would principally service the commercial uses. The access to the service yard would be from Latona Road;

- Erection of Building (B12 Apartments) rising to 7 storeys (ground plus 6) with residential entrances and ancillary areas on the ground floor and residential at upper floors. The building fronts the main entrance to the site on Malt Street;

- Provision of a new Central Square, including hard and soft landscaped areas and street level parking.

36. The following tables outline the key details relating to the Detailed Component.

Table: Detailed Component Maximum GEA

<b>Land use</b>	<b>Maximum GEA sqm</b>
Residential (C3)	49,612
Class B1c	1,197
Mixed Use (A1-A4, B1, D1 and D2)	785
Energy Centre (Sui Generis)	750

Table: Detailed Component Residential Mix

<b>Unit type</b>	<b>No. of total units</b>	<b>% of total units</b>
Studio	9	2.1
1 bed	171	40.7
2 bed	175	41.7
3 bed	65	15.5
Total	420	100

37. The detailed component would include 90 car parking spaces in the basement (32 of which are disabled spaces) and 9 disabled parking spaces within ground floor landscaping (two of which would be for non-residential spaces). The scheme would also provide 12 parking spaces for the commercial floorspace on site.

38. Dedicated servicing areas would be provided to the rear of Buildings B4 and B10 and a layby provided on the new extension to Latona Road to the south of Building B9.

The Outline Component (Phase 2 and Phase 3)

39. The quantum, height and massing of the Outline Component are dictated by the Parameter Plans, Development Specification and Design Principles Document.

40. In summary, the Outline Component includes the following elements would be delivered in two phases (Phase 2 and Phase 3) and would comprise of the following:

- 40% affordable housing, which is comprised of 35% affordable housing with a

tenure split of 25% social rented and 10% intermediate plus an additional 5% intermediate housing;

- An additional 3.1% affordable housing to make up the shortfall in the Detailed Component;
- Up to 880 dwellings;
- Up to 3,316sqm GEA of Class B1 (c) floorspace;
- Up to 1,702sqm of commercial accommodation within use classes A1, A2, A3, A4, B1, D1, D2;
- Erection of Buildings B1, B2, B3, B5, B6, B7, B11 up to 116.55 AOD equivalent to 35 storeys.

#### Demolition and Construction Programme

41. It is anticipated that construction works for Phase 1 would commence later in 2019, with completion for the entire scheme expected in 2027.
42. The main construction activities would be implemented in three phases and therefore construction is unlikely to be undertaken at any one location throughout the construction period. The anticipated dates for main construction activities are set out below.

Table: Construction programme

<b>Phase</b>	<b>Anticipated dates</b>
1	Work Commence: 2019 Completion: 2023 / 2024
2	Work Commence: 2022 Completion: 2025
3	Work Commence: 2022 Completion: 2027

#### Revisions and amendments

43. Two sets of amendments were received during the course of the application.
44. The first was received in October 2018 and the second set of amendments in March 2019. The amendments received have been fully incorporated into the above paragraphs 26-40.

#### October 2018 amendments

45. In summary the main changes made to the scheme following the October 2018 amendments was the increased level of affordable housing from the original offer of 25%, to 35%. Of that 35%, the tenure split was 60% rented (a mix of affordable and social rent) and the remaining 40% as intermediate. The number of homes increased from 1,050 homes, to 1,300 with the height of buildings increasing as follows:
  - Building B3 - increased building height from 20 to 22 storeys;
  - Building B4 - increased building height from 40 to 44 storeys;
  - Building B5 - increased building height from 25 to 27 storeys;
  - Building B6 - increased building height from 32 to 39 storeys;

46. In addition, the employment provision increased from 5,000sqm GEA to 7,000sqm GEA and the provision of 4,513sqm GEA of B1 (c) of light industrial floorspace. A Health Impact Assessment was also submitted.

#### March 2019 amendments

47. In summary, the main changes made to the scheme following the March 2019 amendments include 40% affordable housing, as described in paragraph 28 above, and the reduction in car parking spaces from 154, to 115 spaces. In addition, the applicant committed to 10% wheelchair parking provision across the scheme. The heights of buildings was amended as follows:
- Building B6 reduced building height to 39 storeys, from 35;
  - Building B3 – increased building height from 22 storeys, to 24.
48. Both sets of amendments were subject to a 28 day re-consultation.

#### **Planning history**

##### At Acorn Wharf, Frensham Street

49. Planning permission granted on 29.11.2012 for the erection of a temporary portacabins for a period of three years (retrospective). Reference 12/AP/3262.
50. A prior approval for demolition application was submitted to Southwark Council in January 2014 for the demolition of the former Tulip Sausage Factory on Bianca Road. Southwark Council determined that prior approval was not required for the works and the application was granted in March 2014. The majority of buildings were demolished in 2014.

##### Pre-application advice

51. Pre-application advice was provided in advance of the submission of this application, details of which are held electronically by the Local Planning Authority. A number of meetings were held with the applicant and discussions centred around the provision of affordable housing, the landscape, the quality of the residential accommodation, impacts upon surrounding occupiers including Space Studios and the height and massing of the tall buildings.

##### Scoping opinion

52. An Environmental Impact Assessment Scoping Opinion was submitted on 24 April 2017 to determine the extent of issues to be considered and assessed in the Environmental Statement. A formal response was issued on 26 July 2017.
53. A further scoping opinion was submitted by the applicant on 14 August 2018 in advance of the October 2018 revised scheme. A formal response was issued on 26 September 2018.

## Planning history of adjoining sites

54. The council has received a number of planning applications recently in the Old Kent Road Opportunity Area. These include the following:

55. 18/AP/0897 Ruby Triangle Site, Land bounded by Old Kent Road, Ruby Street and Sandgate Street

Application type: FULL

Full planning permission is sought for demolition of existing buildings and structures on the site, and redevelopment consisting of three buildings at maximum heights of 17 storeys (including mezzanine) (+64.735m AOD), 48 Storeys (+170.830m AOD) and 40 storeys (including mezzanine) (+144.750m AOD), plus single storey basement under part of the site. Development would provide 1,152 residential dwellings (Class C3), retail, business and community spaces (Classes A1, A2, A3, A4, B1(a),(b),(c) and D1), public sports hall and gym (Class D2), public and private open space, formation of new accesses and alterations to existing accesses, energy centre, associated car and cycle parking and other associated works.

Decision: Resolution to grant, subject to a legal agreement, referral to the Mayor of London and Secretary of State (29 October 2018).

56. 17/AP/4596 13-14 Frensham Street, (Nyes Wharf)

Application Type: FULL

Demolition of existing buildings and erection of mixed-use scheme comprising 321sqm (GIA) of flexible A1, A2, A3, A4, B1, D1 and D2 floorspace and 882sqm (GIA) of B1 floorspace at ground and mezzanine levels; with 153 Residential units (Class C3) above in two blocks ranging from 9 to 18 storeys with hard and soft landscaping and associated infrastructure works, including three disabled spaces and cycle parking.

Decision: Resolution to grant, subject to a legal agreement and referral to the GLA (3 September 2018)

57. 18/AP/3246 Land at Cantium Retail Park, 520 Old Kent Road

Application type: FULL

Demolition of existing buildings and redevelopment of the site to provide a new basement level and buildings ranging from 3 to 48 storeys in height (max height 159.05m above ground level) comprising up to 1,113 residential units (Class C3), up to 5,659 sq. m of office floorspace (Class B1(a)), up to 2,228 sq. m of retail floorspace (Class A1), up to 2,336 sq. m of flexible space including use within Classes A1, A3, B1(a), B1(b), D1, D2 and / or Sui Generis (Theatre) within Block B and up to 596 sq. m of flexible space within Classes A1, A2 and / or A3 within Block C together with associated access, car parking, landscaping and infrastructure works.

Decision: Resolution to grant, subject to a legal agreement, referral to the GLA and Secretary of State (5 March 2019).

58. 18/AP/3284 596-608 Old Kent Road and Land at Livesey Place

Application type: FULL

Mixed-use redevelopment comprising the demolition of all existing buildings and structures (listed mural to be removed and stored prior to demolition, and incorporated into proposed development); construction of three buildings arranged around a central plinth ranging in height from 10 to 38 storeys (maximum height

+144.2m AOD) above single basement, ground and mezzanines floors, to provide a range of uses including 372 residential units (Use Class C3), place of worship (Use Class D1), retail (Use Classes A1-A4), and office / light industrial (Use Classes B1(a)/B1(c)); means of access, public realm and landscaping works, parking and cycle storage provision, energy centre / plant and servicing areas, and associated ancillary works.

Decision: Yet to be determined

59. 17/AP/4612 49-53 Glengall Road

Application type: FULL

Demolition of all existing buildings and structures (excluding some of the facades along Glengall Road and Bianca Road and the industrial chimney) and erection of a part 6, 8 and 15 storey mixed-use development comprising 3,855 sqm (GIA) of flexible workspace (Use Class B1) and 181 residential units (Use Class C3) with amenity spaces and associated infrastructure.

Decision: Resolution to grant, subject to a legal agreement, referral to the GLA and Secretary of State (15 January 2019).

60. 18/AP/3551 Southernwood Retail Park

Application type: FULL & OUT

Hybrid planning application for detailed permission for Phase 1 and outline planning permission for Phase 2 comprising:

Application for full planning permission for 'Phase 1' comprising demolition of existing buildings and the erection of a part 9, part 14, part 15, part 48 storey development (plus basement) up to 161.25m AOD, with 940 sqm GIA of (Class A1) retail use, 541 sqm GIA of flexible (Class A1/A2/A3) retail/financial and professional services/restaurant and café use, 8671 sqm GIA (Class C1) hotel; 541 (class C3) residential units (51,757 sqm GIA); landscaping, public realm and highway works, car and cycle parking and servicing area, plant and associated works.

Application for outline planning permission (with details of internal layouts and external appearance

reserved) for 'Phase 2' comprising demolition of existing buildings and the erection of a part 9, part 12, storey development (plus basement) up to 42.80m AOD, with 1049 sqm GIA of flexible (Class A1/A2/A3) retail/financial and professional services/restaurant and café use; 183 (Class C3) residential units (17,847sqm GIA), 1141 sqm GIA (Class D2) cinema and the creation of a 475 sqm GIA (Class C1) hotel service area at basement level; landscaping, public realm and highway works, car and cycle parking and servicing area, plant and associated works.

Decision: On Planning Committee agenda for 28 May 2019 with a recommendation that planning be granted with conditions and subject to the completion of a legal agreement (to be confirmed).

## **KEY ISSUES FOR CONSIDERATION**

### **Summary of main issues**

61. The main issues to be considered in respect of this application are:

- Principle of the proposed development in terms of land use and the release of the site from its industrial designation;

- Environmental impact assessment;
- Affordable housing;
- Design, layout, heritage assets and tall buildings including views;
- Public realm, landscaping and trees;
- Housing mix including wheelchair housing;
- Quality of accommodation;
- Density;
- Impact of proposed development on amenity of adjoining occupiers and surrounding area;
- Transport;
- Noise and vibration;
- Planning obligations (S.106 undertaking or agreement);
- Mayoral and Borough community infrastructure levy (CIL);
- Sustainable development implications;
- Energy;
- Ecology;
- Air quality;
- Ground conditions and contamination;
- Water resources and flood risk;
- Archaeology;
- Wind microclimate;
- Light pollution;
- Health Impact Assessment;
- Socio-economic impacts;
- Equalities and human rights;
- Statement of community involvement; and
- Other matters

### **Legal context**

62. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. In this instance the development plan comprises the London Plan 2016, the Core Strategy 2011, and the Saved Southwark Plan 2007.
63. There are also specific statutory duties in respect of the Public Sector Equalities Duty which are highlighted in the relevant sections below and in the overall assessment at the end of the report.

### **Planning policy**

64. The statutory development plans for the Borough comprise the National Planning Policy Framework 2019, London Plan 2016, Southwark Core Strategy 2011, and saved policies from The Southwark Plan (2007 - July). The site falls within the area covered by the draft Old Kent Road Area Action Plan (draft OKR AAP).

### Planning Policy Designations

- 65.
- The Old Kent Road Opportunity Area;
  - The Old Kent Road Preferred Industrial Location (Strategic);
  - The Urban Density Zone;
  - The Bermondsey Archaeological Priority Area;

- The Air Quality Management Area;
  - The site is allocated within the draft OKR AAP as forming part of proposal site OKR 10;
  - Public transport accessibility level of 3 on a scale of 1-6 where 1 is the lowest level and 6 represents the highest;
  - The proposed development would be within in the extended background area (Wider Setting Consultation Area) of the Protected Vista to St Paul's Cathedral from Kenwood Assessment Point 3A.1; and
66. The nearest conservation area is Glengall Road Conservation Area 125m away from the site. There are also a number of listed buildings within the surrounding area which are listed at paragraph 269-271 of the report.
67. This application should be determined in accordance with the development plan unless material considerations indicate otherwise; and the following national framework, regional and local policy and guidance are particularly relevant.

### **Adopted Policy**

#### National Planning Policy Framework

68. The revised National Planning Policy Framework ('NPPF') was published in February 2019 which sets out the national planning policy and how this needs to be applied. The NPPF focuses on sustainable development with three key objectives: economic, social and environmental.
69. Paragraph 212 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications. The council is preparing the New Southwark Plan (NSP) and OKR AAP which are emerging policy documents. The new London Plan is also in draft form. The weight that can be afforded to these emerging documents is discussed in greater detail in paragraphs 78-81 of this report.

Section 2 - Achieving sustainable development

Section 5 - Delivering a sufficient supply of homes

Section 6 - Building a strong, competitive economy

Section 7 - Ensuring the vitality of town centres

Section 8 - Promoting healthy and safe communities

Section 9 - Promoting sustainable transport

Section 11 - Making effective use of land

Section 12 - Achieving well-designed places

Section 14 - Meeting the challenge of climate change, flooding and coastal change

Section 15 - Conserving and enhancing the natural environment

Section 16 - Conserving and enhancing the historic environment

70. National Planning Policy Guidance (2014). (Web-based resource which brings together planning guidance on various topics into one place).

#### The London Plan 2016

71. The London Plan is the regional planning framework and was adopted in 2016. The most relevant policies are those listed below.

Policy 2.17 Strategic Industrial locations

Policy 3.3 Increasing housing supply  
 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 4.3 Mixed use development and offices  
 Policy 4.4 Managing industrial land and premises  
 Policy 5.7 Renewable energy  
 Policy 5.8 Innovative energy technologies  
 Policy 5.11 Green roofs and development site environs  
 Policy 5.12 Flood risk management  
 Policy 5.13 Sustainable drainage  
 Policy 5.21 Contaminated land  
 Policy 6.9 Cycling  
 Policy 6.10 Walking  
 Policy 6.13 Parking  
 Policy 7.2 An inclusive environment  
 Policy 7.3 Designing out crime  
 Policy 7.4 Local character  
 Policy 7.6 Architecture  
 Policy 7.8 Heritage assets and archaeology  
 Policy 7.21 Trees and woodlands  
 Policy 8.2 Planning obligations  
 Policy 8.3 Community infrastructure levy

72. The London Plan 2016 identifies the Old Kent Road as an Opportunity Area with “significant potential for residential – led development along the Old Kent Road corridor”. Opportunity areas are described in the London Plan 2016 as London’s major reservoirs of brownfield land with significant capacity to accommodate new housing, commercial and other development linked to existing or potential improvements to public transport accessibility.
73. Policy 2.13 in the London Plan 2016 sets out the strategic policy for the development and intensification of opportunity areas. Annex 1 includes an indicative capacity for Old Kent Road of 2,500 homes and 1,000 jobs and supports the development of a planning framework to realise the area’s full growth potential. It goes on to state that the employment and minimum homes figures should be explored further and refined in a planning framework for the area and through a review of the Strategic Industrial Location and capacity to accommodate a phased rationalisation of its functions in the opportunity area or a provision elsewhere.

#### Core Strategy 2011

74. The Core Strategy was adopted in 2011 providing the spatial planning strategy for the borough. The strategic policies in the Core Strategy are relevant alongside the saved Southwark Plan (2007) policies. The relevant policies of the Core Strategy 2011 are:

Strategic policy 1 - Sustainable development  
 Strategic policy 2 - Sustainable transport

Strategic policy 3 - Shopping, leisure and entertainment  
Strategic policy 4 - Places for learning, enjoyment and healthy lifestyles  
Strategic policy 5 - Providing new homes  
Strategic policy 6 - Homes for people on different incomes  
Strategic policy 7 - Family homes  
Strategic policy 10 - Jobs and businesses  
Strategic policy 11 - Open spaces and wildlife  
Strategic policy 12 - Design and conservation  
Strategic policy 13 - High environmental standards  
Strategic policy 14 - Implementation and delivery

Southwark Plan 2007 (July) - saved policies

75. In 2013, the council resolved to 'save' all of the policies in the Southwark Plan 2007 unless they had been updated by the Core Strategy with the exception of Policy 1.8 (location of retail outside town centres). Paragraph 213 of the NPPF states that existing policies should not be considered out of date simply because they were adopted or made prior to publication of the Framework. Due weight should be given to them, according to their degree of consistency with the Framework. The relevant policies of the Southwark Plan 2007 are:

1.1 - Access to employment opportunities  
1.2 - Strategic and local preferred industrial locations  
1.5 - Small businesses  
2.2 - Provision of new community facilities  
2.5 - Planning obligations  
3.2 - Protection of amenity  
3.3 - Sustainability assessment  
3.4 - Energy efficiency  
3.6 - Air quality  
3.7 - Waste reduction  
3.9 - Water  
3.11 - Efficient use of land  
3.12 - Quality in design  
3.13 - Urban design  
3.14 - Designing out crime  
3.15 - Conservation of the Historic Environment  
3.18 – Setting of Listed Buildings, Conservation Areas and World Heritage Sites  
3.19 – Archaeology  
3.20 – Tall Buildings  
3.22 – Important Local Views  
3.28 - Biodiversity  
4.2 - Quality of residential accommodation  
4.3 - Mix of dwellings  
4.4 - Affordable housing  
4.5 - Wheelchair affordable housing  
5.2 - Transport impacts  
5.3 - Walking and cycling  
5.6 - Car parking  
5.7 - Parking standards for disabled people and the mobility impaired

Supplementary Planning Documents (SPDs)

76. Development Viability SPD (2016)  
Technical Update to the Residential Design Standards SPD (2015)

Section 106 Planning Obligations/CIL SPD (2015)  
Affordable housing SPD (2008 - Adopted and 2011 - Draft)  
Residential Design Standards SPD (2011)  
Sustainable Transport SPD (2010)  
Sustainable design and construction SPD (2009)  
Sustainability assessments SPD (2009)

#### Greater London Authority Supplementary Guidance

77. Housing SPG (2016)  
London View Management Framework (2012)  
London's World Heritage Sites SPG (2012)  
Providing for Children and Young People's Play and Informal Recreation (2008)  
Use of planning obligations in the funding of Crossrail (2010)  
Affordable Housing and Viability SPG (2017)

#### **Emerging policy**

##### Draft New London Plan

78. The draft New London Plan was published on 30 November 2017 and the first and only stage of consultation closed on 2nd March 2018. Minor suggested changes to the plan were published on 13th August 2018 and an Examination in Public (EIP) began on 15th January 2019. Further suggested changes to the Plan have been proposed by the Mayor and published in response to the EIP Panel of Inspector's matters at the examination sessions. The EIP will continue until May 2019 and until the London Plan reaches formal adoption it can only be attributed limited weight. The draft New London Plan identifies the Old Kent Road as having a minimum capacity for housing of 12,000 and a jobs target of 5,000, which increases the capacity of the adopted London Plan of 2,500 homes and 1,000 jobs.

##### Old Kent Road Area Action Plan (draft OKR AAP)

79. The council is preparing an Area Action Plan/Opportunity Area Planning Framework for Old Kent Road (AAP/OAPF) which proposes significant transformation of the Old Kent Road area over the next 20 years, including the extension of the Bakerloo Line with new stations along the Old Kent Road towards New Cross and Lewisham. Consultation has been underway for 3 years, with a first draft published in 2016. A further preferred option of the Old Kent Road AAP (Regulation 18) was published in December 2017 and concluded consultation on 21st March 2018. As the document is still in draft form, it can only be attributed very limited weight.
80. Whilst acknowledging this very limited weight, members are advised that the draft OKR AAP places the application site within the proposed Action Area Core, and within proposal site OKR 10 which covers the area bounded by Glengall Road, Latona Road and Old Kent Road. Requirements for this allocation site include requiring existing employment and retail floorspace to be replaced and frontages along Old Kent Road activated through provision of retail (A Class), business (B Class) or community uses (D Class). Also relevant to this specific site are the requirements to provide a new park on the alignment of the Surrey Canal and provide on site servicing.

##### New Southwark Plan (NSP)

81. For the last 5 years the council has been preparing the New Southwark Plan which

will replace the saved policies of the 2007 Southwark Plan and the 2011 Core Strategy. The council concluded consultation on the Proposed Submission version (Regulation 19) on 27 February 2018. The New Southwark Plan Proposed Submission Version: Amended Policies January 2019 is being consulted on until 17 May 2019. It is anticipated that the plan will be adopted in late 2019 following an Examination in Public (EIP). As the NSP is not yet adopted policy, it can only be attributed limited weight. Nevertheless paragraph 48 of the NPPF states that decision makers may give weight to relevant policies in emerging plans according to the stage of preparation of the emerging plan, the extent to which there are unresolved objections to the policy and the degree of consistency with the Framework.

### **Principle of development in terms of land use**

82. The National Planning Policy Framework offers a number of key principles that emphasise a focus on driving and supporting sustainable economic development to facilitate the delivery of new homes and commercial business units etc. The site is located within the Old Kent Road Opportunity Area. In locations such as these, the London Plan and Southwark Plan policies strive for higher density, high quality mixed use developments which assist in addressing the need for new homes and ranges of employment opportunities.
83. The site is also identified as falling within proposal site OKR10 within the draft OKR AAP. The draft site allocation states that redevelopment on this site must:
- Replace existing employment floorspace (B Class);
  - Replace existing retail floorspace and frontages along Old Kent Road activated through provision of retail (A Class), business (B Class) or community uses (D Class);
  - Provide land for a new primary school on the Asda site;
  - Provide a new park on the alignment of the Surrey Canal;
  - Provide new pocket parks on the Asda site;
  - Potentially provide a new tube station; and
  - Provide on site servicing.
84. The existing uses on the site are not considered to maximise the development potential for the Opportunity Area designation, and the replacement mix of uses and delivery of up to 1,300 new homes would deliver major regeneration benefits as discussed later in the report.

### Industrial land

85. The site is located in a strategic preferred industrial location (SPIL) identified in the Core Strategy. Strategic Policy 10 of the Core Strategy states that SPIL will be protected for industrial and warehousing uses. Saved Southwark Plan policy 1.2 states that the only developments that will be permitted in SPIL are B class uses and other sui generis uses which are inappropriate in residential areas. The proposal would be contrary to strategic policy 10 of the Core Strategy which advises that industrial and warehousing floorspace will be protected in preferred industrial locations. It would also represent a departure from saved policy 1.2 of the Southwark Plan by introducing residential uses into the SPIL.
86. Strategic policy 10 of the Core Strategy states that the SPIL will be protected for industrial and warehousing uses. The Core Strategy does, however, recognise that structural changes in the economy are resulting in a declining need for industrial

land in London. The Core Strategy also recognises that diversifying the range of job opportunities in the industrial locations into new sectors would benefit local people. Further, it sets out the future direction of Old Kent Road as a growth and regeneration action area, subject to a future area action plan (AAP).

87. London Plan policy 2.17 seeks to promote, manage and where appropriate, protect the Strategic Industrial Land as London's main reservoir of industrial and related capacity, which includes general and light industrial uses. It states that developments on Strategic Industrial Land should be refused unless they provide for broad industrial type activities, are part of a strategically co-ordinated process of SIL consolidation through an opportunity area planning framework, meet the needs of small to medium sized enterprises or provide for small scale 'walk to' services for industrial occupiers such as workplace crèches or cafes.
88. The London Plan designates the Old Kent Road as an opportunity area, with an indicative capacity of 1,000 new jobs and a minimum of 2,500 new homes, which has been increased to a minimum of 12,000 in the emerging London Plan. It identifies the potential for residential-led development along the Old Kent Road corridor, with homes and jobs targets to be explored and further refined through the preparation of a planning framework and a review of the Old Kent Road Strategic Industrial Location.

#### The draft Old Kent Road Area Action Plan (draft OKR AAP)

89. The draft OKR AAP sets targets of a total of 20,000 new homes and 10,000 new jobs as well as new infrastructure, including parks and schools. It proposes the release of a substantial part of the Preferred Industrial Location designation to allow for the creation of mixed use neighbourhoods, so that new and existing businesses are designed to co-exist with new homes.
90. Paragraph 216 of the NPPF states that weight can be afforded to relevant policies in emerging plans depending on the stage of preparation of the plan. The New Southwark Plan and Old Kent Road Area Action Plan have been subject to extensive consultation however they have yet to be subject to independent examination and therefore the documents have limited weight. They do, however, provide an indication of the direction of travel for planning policy in the opportunity area.
91. Taking into account the adopted policy position, when determining whether the principle of the proposed development would be acceptable in land use terms, Members need to consider whether the wider regeneration benefits of the scheme would outweigh any harm caused by the loss of protected industrial site and the introduction of residential, retail, office and community/leisure uses, and whether those benefits therefore justify a departure from the adopted planning policy. Officers consider that there would be wider benefits arising from the proposal that would justify a departure from the adopted policy and these is considered in the following paragraphs.

#### Employment re-provision

92. The proposed replacement employment floorspace comprises up to 7,000sqm of commercial space, of which 4,513sqm would be secured as B1(c) floorspace and a further 2,487sqm of flexible commercial space across use classes A1-A4 (retail), B1a (offices) and D1 and D2 (public services, leisure and entertainment). The existing employment floorspace comprises 4,188sqm and the replacement

employment provision includes 4,513sqm of space specifically designed and secured for B1(c) purposes which is an uplift of 325sqm.

93. On this basis there would be no loss of existing light industrial floorspace. The floorspace would be specified by condition as Class B1(c), to include minimum floor to ceiling heights to ensure the functionality of the space for light industrial use. The light industrial floorspace would be provided in two dedicated buildings, Buildings B10 and B11 arranged around a service yard. These light industrial buildings would be intentionally located to the west of the site, adjacent to the existing Space Studios, where they would contribute to forming a hub of creative industry, details of which would be as follows:
94. Building B10: The space would be designed for flexible uses and so could be subdivided to form small units and would have a floor to ceiling of 3.1m. This space could be used for certain light industrial uses and the ground floor frontages would be designed to allow large equipment or goods to be transported into the unit. Servicing is via a dedicated service yard to the rear of the building (B10) which is accessed from Latona Road. This yard would give access to large vehicles and support a range of uses. Refuse collection can be managed directly from Latona Road and provision would be made for cycle provision for staff.
95. Building B11: This would be the largest commercial building with no other uses in the building. The main entrance would be from Latona Road as noted above and it would link with B10 to form a large managed facility for multiple occupiers. It would provide Class B1(c) floorspace including a range of flexible workspaces at ground floor with ceiling heights of a minimum of 3.5m, wide opening doors and access to vehicles. It should be noted that the floor to floor ceiling heights are less than the 4m required by the draft OKR AAP. Nonetheless given the fit out specification and access to dedicated vehicle servicing off a new yard space, it is considered that they would provide attractive workspace to potential occupiers. Servicing is via the yard to the rear of B10. Provision for refuse collection and cycles for staff have been designed into the scheme.
96. The specification of the B1(c) units is important to ensure that they can fulfil the uses they are designed to provide and by way of summary the key points of this are:
  - The floors to be designed to take heavy loads associated with the requirements of light industrial users;
  - A specific goods lift would be provided in both Building B10 and Building B11 to allow for the movement of large machinery and materials;
  - Floors would be finished with oil resistant and slip resistant coatings to ensure the durability of the space;
  - Sound insulation would be provided where required and additional insulation can be added for noisier activities;
  - Units would be open plan for flexibility of use;
  - Metered hot water would be supplied from the site wide energy centre where required;
  - A commercial extract system for noxious output to be installed as required in Building B10 and Building B11 and all units would be fitted out with base build mechanical and engineering services which can be upgraded as per specific tenant requirements including heating, cooling, lighting, toilet and kitchen facilities (all to be secured by condition);
  - Individually metered water, electricity, telecoms/data and hot water would be supplied as required.

- The separating slab between commercial and residential above would be specifically designed to reduce noise transfer in Building B10.

97. In order to secure the 4,513sqm of floorspace as B1(c) light industrial, a planning condition has been attached to the draft decision notice. A condition will also require the workspace to be fully sprinkled for fire safety purposes.

Business relocation

98. There are three businesses currently operating on the site. The first is Southwark Council Estates Department who are occupying the site for temporary storage purposes. They have a short term lease until June 2019 with the ability to terminate the lease on 1 months notice. The estates team have always been aware of the development plans for the site.
99. Travis Perkins are the second business. Their current lease expired in December 2018 and a new short term lease was agreed with Travis Perkins which allows the applicant to obtain vacant possession in March 2020 in line with the phasing plan. The applicant has been discussing the redevelopment plans with Travis Perkins since 2016 and they are fully aware of the proposed development.

HCT Group are the final tenant, who also occupy the site for vehicular storage/depot with administrative offices. They have a short term tenancy agreement until February 2021 with the ability to terminate the lease on 1 months notice. The applicant has advised that they took the lease on the understanding that it was only available for a short term period.

100. Therefore, it is clear from the above, that no company or business is expected to cease trading as a result of the proposal. Both depot uses expect to relocate and have no expectation to remain on site. Officers have been in discussions and regular dialogue with Travis Perkins and have explored some potential sites within the Opportunity Area that they could relocate to, although to date a site within the Opportunity Area has not been found. Officers will continue to work with Travis Perkins and other landowners to secure a relocation locally if possible. .

Table: Existing employment space

<b>Business</b>	<b>No. of jobs</b>	<b>Occupied</b>	<b>Use Class</b>
Southwark Council (for temporary storage) at Bianca Road	7	Yes Short term lease	B8
HCT Group (local coach storage) at Surrey Wharf	20	Yes Short term license	B8
Travis Perkins at Acorn Wharf	37	Yes, lease expiring 2020	B8/ Sui generis
<b>Total</b>	<b>63</b>		

Job Creation

101. Currently, 63 staff are employed in association with the vehicle storage depots and by Travis Perkins. By comparison, the new development would support a much higher number of jobs. As the new floorspace would be designed flexibly,

estimations have been made based on a “high employment scenario” which assumes a higher density occupation and a “low employment scenario” where the space would be occupied as more workshops, SME (small to medium enterprises) and studio space rather than conventional offices. The table below provides the high and low scenarios for job creation.

Table: Future employment – high and low scenarios

	Floorspace (NIA)	High scenario		Low scenario	
		Employment density	Jobs	Employment density	Jobs
B1(C)	3,503	15	234	47	74
B1(a)	879	11.8	74	11.8	74
Other commercial	1,256	17.5	71	17.5	71
Residential management jobs			13		13
Application site total	5,638		392		232

102. Given that there are 63 jobs on site at present, the low scenario would deliver 232 jobs and the high scenario would deliver 392 jobs. The increase in jobs when compared to the existing numbers, an uplift of 169 in the low scenario and 329 in the high growth scenario which is a positive aspect of the proposals, and would contribute to the draft OKR AAP target of creating an additional 10,000 jobs in the area.

Affordable Workspace

103. 10% of the Class B1(c) floorspace would be safeguarded as affordable workspace, which would assist businesses through the provision of affordable, accessible and flexible workspace. The location of the affordable workspace has not been defined yet but it is likely it would be within the standalone Building B11 since this provides wholly B1c floorspace. This equates to up 451sqm GEA on site, comprised of flexible unit sizes, and specifications to meet a multitude of business needs. This space would be offered to existing businesses in the Old Kent Road Opportunity Area first. The floorspace has been offered at £17 per sq ft to the user whether it is directly let by Berkeley Homes or by a workspace provider. The applicant has stated that they are open to offering the space for a period of 30 years and would review the £17 per sq ft figure in the light of market testing and dialogue with potential occupiers. The rent to the workspace provider would be lower than the £17 per sq ft and would be determined through the s106 negotiations.

Specialist workspace provider

104. The employment space has been designed to be flexible so that it could accommodate a range of different unit sizes and shared workspaces. The applicant has committed to secure a creative workspace provider. This can be secured through a section 106 planning obligation.

### Assessment of main town centre uses

105. In order to provide the applicants vision for a mixed use place, the proposals under consideration would incorporate a mix of residential, commercial and community uses. The non-residential uses would be concentrated on the lower floors of the proposed buildings, where they would contribute to the creation of a vibrant and animated place. The breakdown of non residential land uses proposed is set out in paragraph 36 of this report, but to summarise it consists of 2,487sqm of non residential floor space. As such, a maximum potential 2,487 sqm town centre uses is proposed.
106. The NPPF, London Plan and Strategic Policy 3 of the Core Strategy, all require applications for “town centre” uses outside a defined centre to demonstrate a sequential approach to site selection and that there are no unacceptable impacts to any defined town centres.
107. The NPPF (2018) defines Main Town Centre Uses as: “Retail development (including warehouse clubs and factory outlet centres), leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).”
108. The site is not currently within a designated town centre however, it falls within the boundary of one of the two Old Kent Road ‘district centres’ the council are proposing within the draft New Southwark Plan and draft OKR AAP. The draft OKR AAP shows part of the site as having a town centre
109. The proposals includes the provision of 2,487sqm (GEA) of flexible commercial accommodation within use classes A1-A4 (retail), B1 (business), D1 (public services) and D2 (entertainment and leisure) being provided.
110. The provision of 2,487sqm floorspace would provide up to 145 new jobs on site. These jobs would be in addition to the already substantial provision of light industrial opportunities being provided and would further intensify the contribution of the proposal to the local economy.
111. The objective of the two new town centres is to create a more cohesive town centre that better meets the needs of existing and new residents and workers in the local area. The new district town centre that the site would form part would include retail, leisure, entertainment and recreation facilities in a significantly more attractive and accessible environment.
112. It follows that the site would form part of the defined town centre once the draft OKR AAP is adopted and the uses would help to support and contribute to the vitality and viability of that new centre.
113. The NPPF states that when assessing applications for retail, leisure and office development outside of town centres, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold, or if there is no locally set threshold, the default threshold is 2,500 sqm. Southwark has no local threshold. London Plan Policy 4.7 and draft London Plan policy SD7 also requires an impact assessment. The impact assessment should test

the impact of the proposal on existing, committed and planned public and private investment in centres in the catchment area of the proposal; and the impact on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years ahead.

114. Strategic Policy 3 of the Southwark Core Strategy relates specifically to shopping, leisure and entertainment and aims to maintain Southwark's network of successful designated town centres. As part of this, the policy identifies a hierarchy of town and local centres, reflecting their size and role in the borough. In the adopted Core Strategy, the Old Kent Road is not identified as one of these designated town centres, despite the significant retail offer that it provides. The policy then goes on to identify the tests set out in national planning policy and the London Plan for new shopping and leisure space which are proposed outside designated town and local centres.
115. Southwark Plan Saved Policy 1.7 relates to development within town centres, and states that most new development for town centre uses should be accommodated within existing town centres and local centres. Policy 1.8 (Location of retail outside town centres) was not found to be in conformity with the NPPF and was accordingly not saved when the plan was revised in 2013.
116. The Southwark Retail Study 2015 and the 2018 Old Kent Road update provide a robust and credible evidence base to inform the council's work on the New Southwark Plan. This identified that Old Kent Road is the dominant destination for comparison shopping in the borough, and the proposal to introduce two designated town centres supports future capacity and growth. In addition to the replacement of existing retail uses, e.g. food supermarkets and bulky goods stores in the OKR, new premises have the opportunity to establish linear high street frontages. The report also recommends that new types of retail provision could be expanded and there is an opportunity for new sectors that are currently poorly presented, e.g. fashion and food and beverage. The proposal meets this objective.
117. Acknowledging its limited weight, it is worth noting that emerging Policy P30, Town and Local Centres of the draft NSP proposes the Old Kent Road as two district centres. It also states that town centre uses will be permitted in town centres where:
  - The scale and nature is appropriate to the role and catchment of the centre; and;
  - A Use Classes are retained or replaced by an alternative use that provides a service to the general public, and would not harm the vitality and viability of the centre; and
  - The development would not harm the amenity of surrounding occupiers or result in a concentration of uses that harms the character of the area; and
  - The development provides an active use at ground floor in locations with high footfall; and
  - Large schemes for town centre uses that are 1,000 sqm or more provide public toilets, public drinking fountains and public seating.
118. In terms of the allocation sites identified in the draft NSP, the application site is contained within the boundary of NSP 65. The NSP states that development here should provide new homes, retail, community uses, employment floorspace as well as strategic public open space including the Surrey Canal Linear Park. In addition, it states that development should reinforce the high street and provide a new part of the town centre.

119. Again, acknowledging its very limited weight, draft OKR AAP Policy AAP 7, Town Centres, Leisure and Entertainment, identifies the site as falling in a district centre and identifies the uses that would be appropriate, including retail, community, leisure, cultural and offices above shops.
120. It is clear therefore that emerging policy and the existing evidence base for the Old Kent Opportunity Road area support mixed use development and the designation of the Old Kent Road as a high street and town centre. Nonetheless, and in recognition of the limited weight of this emerging policy, the applicant has carried out a sequential test and retail impact assessment of the proposed development.
121. The applicant has undertaken an assessment to identify potential alternative sites within 1km of the development. This assessment identified the following locations:
  - Elephant and Castle;
  - Peckham;
  - Canada Water;
  - Camberwell.
122. The site is one of the largest allocated sites in the Old Kent Road comprising 2.31ha of land delivering up to 1300 homes, 4513sqm of B1(c) and up to 2,487sqm of flexible uses. As noted previously the 2,487sqm of flexible uses proposed are secondary to the delivery of the major components in the scheme, which are housing and light industrial floorspace.
123. The availability of such large sites in Town Centres/central areas is very limited. All of the areas identified above have developed major retail and leisure functions through Opportunity Area Frameworks and Area Action Plans. All major sites are developed or are identified for development. Thus the opportunity of locating to more central sites or town centre sites has been assessed and none has been identified as being suitable.
124. The site is within the OKR 10 site allocation and the draft OKR AAP seeks a range of retail and other uses on sites across the designated site. Furthermore Policy AAP7 of the Draft OKR AAP notes that generally within the Old Kent Road (not just in Town Centres) development should seek to increase both the quantum and types of retail, provide a mix of sizes of unit and provide a range of leisure and food and drink uses. The scheme meets these objectives.
125. It is considered that the flexible uses proposed are complementary to the principal uses proposed on the scheme, namely homes and light industrial floorspace. The proposed convenience retail, office, leisure and food & drink uses would activate the proposed Central Square and Linear Park. The scale and flexibility of the uses proposed means that they are subservient to the adjoining large scale town centre uses to the north and complement rather than compete with them. The submitted assessment has demonstrated the proposed scheme would not create adverse impacts for the wider area or any other defined town centre.
126. The submitted assessment has demonstrated that the site is sequentially the most preferable site for the proposed scheme and meets the tests within the NPPF. Further, the uses would form part of the new district town centre proposed under the draft New Southwark Plan and the draft OKR AAP.
127. In order to ensure that there would not be an over-dominance of Class A4 (drinking

establishments), it is felt appropriate to attach a compliance condition to the draft decision notice to ensure that no more than 25% of the commercial uses should be used for Class A4 (drinking establishments). This is to ensure there would be an acceptable mix of uses provided on the ground floor, and in the interests of protecting neighbouring residential amenity. Conditions to control opening hours for the Class A3 (cafes and restaurants) and Class A4 (drinking establishments) uses would be included on the draft decision notice.

#### Independent retail

128. Draft NSP Policy 28 and London Plan policy 4.9 Local Shops state that development must incorporate well designed and flexible units suitable for small and independent businesses. It has been agreed with the applicant that the retail unit in Outline Building B6 would be secured for smaller companies who currently have no more than three retail outlets, so as to ensure they would be recognisably independent, with a marketing strategy to attract these smaller independent companies. This would ensure that the development would offer a different kind of retail/commercial use.

#### Offices

129. The detailed and outline proposals combined would provide up to a total of 879 sqm of B1a offices. Small scale offices could be included as part of the B1a provision. This office use would not be expected to generate any adverse effect on established office locations in the borough such as Bankside, Borough and London Bridge and would help to deliver new jobs for Old Kent Road and would add positively to the range of workspace types available in the area. The office use would be consistent with the emerging policy allocation which includes identification as a district centre. On this basis, the office use is supported.

#### D Class Community/leisure uses

130. The scheme includes the provision of Class D1 (public services such as medical or health services, exhibition halls) and Class D2 (entertainment and leisure) uses. Saved Policy 1.11 Arts, Culture and Tourism uses and Policy 2.2 Provision of new Community Facilities of the Southwark Plan support these uses, provided they would not be detrimental to the amenity of present and future occupiers of the surrounding area. The site is considered appropriate and acceptable for these uses, and their inclusion with retail, offices and B1(c) light industrial uses would create a genuine mixed use place. The D1 and D2 uses, which could include an art gallery use, would be open for existing as well as new residents to use, and would be a positive aspect of the proposals. Opening hours for these uses would be included on the draft decision notice.

#### Space Studios

131. Space Studios adjoins the site to the west. It is a three storey building and contains studio workspaces that are occupied by 98 artists. The workspaces are available 24/7 and many of the studio units contained within the building have very good access to daylight. They also have a large secure car park/servicing yard area.
132. As detailed in the consultation section of the report, they have submitted objections to the proposed development as they are concerned about the loss of daylight from the scheme as well as new residential uses in close proximity to their servicing yard area as they feel introducing the use would constrain the ongoing use of their yard

space.

133. In relation to the loss of daylight, this is considered in paragraphs 404-408 below. In summary, the applicants daylight report does note that there would be a daylight impact to the building, mainly because the windows do currently receive very good levels of daylight because they are mostly unrestricted. The impact in relation to daylight is not felt to cause substantial harm to warrant refusal of the proposed development.
134. Space Studios also remain concerned about the proximity of the new residential uses and whether they would impact on the 24/7 operation of the studios. The applicant has designed their scheme so that it could successfully co-exist with Space Studios, based on Agent of Change principles. This is discussed in the following paragraphs.

#### Agent of change

135. The co-location of residential uses with industrial uses should include appropriate design mitigation of the residential elements to ensure that the industrial activities are not compromised, on “agent of change” principles.
136. It is considered that the proposed development would integrate well with existing businesses such as Space Studios as well new businesses moving in. The position of residential uses at first floor and above would go some way to ensuring that any noise nuisance would be mitigated for example. In addition, the separating slab between commercial and residential above is specifically designed to reduce noise transfer in Building B10, whilst Building B11 would be entirely in B1(c) use and directly adjoins Space Studios.

#### Provision of a new park

137. In line with the requirements of the draft OKR AAP, the development would deliver a significant contribution to the new Linear Park envisaged between Burgess Park and Verney Road, roughly along the alignment of the former Grand Surrey Canal. The provision of this park would be a significant improvement over the existing tarmacked site. In order to ensure consistency along the Linear Park, the landscape proposals for this development need to be carefully coordinated with those of the neighbouring sites. There have been a number of meetings with adjoining landowners to ensure that this is the case.
138. The park would be capable of linking with the Linear Park proposed as part of the approved schemes at Nye’s Wharf scheme and Cantium Retail Park which would provide a continuous route along these three separate sites.

Image: Landscape plan



139. One of the changes being made to the draft OKR AAP is that an additional park space off the Linear Park would be provided on the council's Frensham Street depot site, to create a south facing park space approximately the size of Bird in the Bush Park (1.5 hectares). Ideas for the use of the park would be developed with the local community and could include a multi use games area and allotment space for growing food and the council providing tools for gardening. This additional park space would adjoin the linear park being provided as part of the scheme with maintenance shared by all developers who own land in the Linear Park, including the applicant and this will be secured in the legal agreement.
140. It is recommended that the delivery of the park space that forms part of the proposed development be secured as part of the legal agreement to secure the timing for its delivery, access by foot and by bicycle and sustainable drainage. The detailed design of the landscape for the park should be reserved by condition, and could include a higher proportion of green planting to hard paving in the main Central Square than is currently shown on the indicative plans (this is discussed further later in the report). The legal agreement should also include clauses relating to maintenance, including maintenance related to the council's Frensham Street Park. When two adjoining landowners have completed delivery of the Linear Park, a Linear Park Management Company should be established to run and manage the park, similar to the Nine Elms Model in Vauxhall, with details to be secured by the legal agreement. The applicant has agreed to this approach.

#### Art strategy

141. The applicant proposes to create a sculpture park within the public realm. Their plan

entails the permanent display of a selection of pieces, complemented by additional changing pieces. This has been discussed with officers on numerous occasions. As part of the Section 106, a Public Art Strategy has accordingly been secured for the submission of, and ongoing review of a Public Art Strategy for the entire public realm. This should set out how local artists would be engaged with, the terms under which their work will be displayed, and how often new work will be exhibited. The section 106 should also require the applicant to monitor the strategy and report progress to the council periodically.

#### Provision of housing, including affordable housing

142. The scheme would provide up to 1300 new residential units, including more than a policy compliant affordable housing comprising social rented and intermediate units, at 40%. There is a pressing need for housing in the borough. Policy 3.3 of the London Plan supports the provision of a range of housing and sets the borough a target of 27,362 new homes between 2015-2025. This is reinforced through Strategic Policy 5 of the Core Strategy which requires development to meet the housing needs of people who want to live in Southwark and London by providing high quality new homes in attractive areas, particularly growth areas. This is echoed by emerging policy in the draft new London Plan, NSP and draft OKR AAP. The proposal would make a sizeable contribution to the borough's housing stock and combined with a policy compliant affordable housing offer; this is considered to represent a significant positive aspect of the scheme.

#### Prematurity

143. Legal Advice received in relation to this issue highlights the following from the National Planning Policy Guidance "arguments that an application is premature are unlikely to justify a refusal of planning permission other than where it is clear that the adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, taking the policies in the Framework and any other material considerations into account. Such circumstances are likely, but not exclusively, to be limited to situations where both:
  - (a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging Local Plan or neighbourhood planning; and
  - (b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area.
144. Refusal of planning permission on grounds of prematurity would seldom be justified where a draft Local Plan has yet to be submitted for examination, or in the case of a Neighbourhood Plan, before the end of the local planning authority publicity period. Where planning permission is refused on grounds of prematurity, the local planning authority will need to indicate clearly how the grant of permission for the development concerned would prejudice the outcome of the plan-making process."
145. The most up to date development plan pertinent to the Old Kent Road area is the 2016 London Plan. This identifies the Old Kent Road Opportunity Area as having significant potential for housing led growth. The draft OKR AAP has been developed in response to this adopted plan and has also sought to address the emerging policy position of the draft New London Plan including the increased housing target for the opportunity area and the need to ensure that the New London Plan aspirations for industrial land and employment are addressed. This scheme is not considered to

undermine either the strategic or local plan making process, and reflects the adopted statutory development plan position of the 2016 London plan and the direction of travel of the draft New Southwark Plan and the 2016 and 2017 draft OKR AAPs and the 2018 draft New London Plan. It is not therefore considered to be premature.

#### Conclusion on land use

146. There are major regeneration benefits of the scheme including the provision of a new Linear Park, job creation, the provision of good quality, flexible commercial space including 10% affordable workspace, securing of a public art strategy, a very sizeable contribution to the borough's housing stock and a more than policy compliant level of affordable housing. For these reasons, officers consider that the principle of the proposed development in land use terms should be supported. In relation to town centre uses, it is considered that whilst the proposed development would introduce main town centre uses outside a currently designated town centre, the proposals would comply with the tests set out in the NPPF and would not be to the detriment of other designated centres. In addition, they would help deliver the draft OKR AAP's aspirations to create two new town centres in Old Kent Road. The provision of small scale offices is supported and the provision of Class D uses would be further uses to help create a vibrant, genuine mixed use neighbourhood.
147. In light of these factors, officers consider that the principle of the proposed development in land use terms should be supported.

#### **Environmental impact assessment**

148. Applications where an Environmental Impact Assessment (EIA) is required will either be mandatory or discretionary depending on whether the proposal constitutes Schedule 1 (mandatory) or Schedule 2 (discretionary) development of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. The proposed development falls within Schedule 2, Category 10(b) 'Urban Development Project' of the EIA Regulations and constitutes EIA development having regard to its potential for likely significant environmental effects.
149. Prior to the submission of the planning application, the applicant requested 'Scoping Opinions' under Regulation 13 of the EIA Regulations to ascertain what information the Local Planning Authority considered an Environmental Statement (ES) should include. These were issued on 26 July 2017 and 26 September 2018.
150. Regulation 3 of the EIA Regulations precludes the granting of planning permission unless the Council has first taken the 'environmental information' into consideration. The 'environmental information' means the ES, including any further information, any representations made by consultation bodies, and any other person, about the environmental effects of the development.
151. In accordance with the EIA Regulations, an Environmental Statement (ES) comprising a Non-Technical Summary, Environmental Statement and Technical Appendices accompanies the application. Addendums were submitted to consider the March 2019 amendments. The documents detail the results of the EIA and provide a detailed verification of the potential beneficial and adverse environmental impacts in relation to the proposed development, including the following areas of impact:
  - Transport
  - Air Quality

- Noise and Vibration
- Ground Conditions
- Hydrology and Flood Risk
- Townscape and Visual
- Archaeology and Heritage
- Socio-economics
- Daylight and sunlight
- Environmental Wind

152. In assessing the likely environmental effects of a scheme, the ES identifies the existing (baseline) environmental conditions prevailing at the site, and the likely environmental impacts (including magnitude, duration, and significance) taking account of potential sensitive receptors. It further identifies measures to mitigate any adverse impacts, and a summary of potential positive and negative residual effects remaining after mitigation measures is included.
153. Additional environmental information or 'further information' to support the ES was submitted in October 2018 and March 2019 following revisions made to the proposed development and these were subject to further consultation in accordance with Regulation 22 of the EIA Regulations. Information on the potential environmental impacts of the scheme and mitigation (where required) is included in the various sections of this report. Officers consider that the ES contains sufficient information to assess the impacts of the proposal.

#### Alternatives

154. The EIA Regulations require an ES to include an outline of the main alternatives considered by the applicant, indicating the main reasons for the choice made, taking into account the environmental effects. This legal requirement is expressed in very general and high-level terms, requiring only the inclusion of an outline of main alternatives and an indication of main reasons.
155. The following provides an outline of the main alternatives and the main reasons for choosing the submitted scheme in preference to them.
156. No development and alternative sites: The site lies within the Old Kent Road Opportunity Area, which was designated by the Mayor of London in 2015 to bring forward regeneration and renewal of an area.
157. The option of no development on the site is at odds with the Opportunity Area objectives as set out in the adopted London Plan 2016. If the site was not identified as part of an Opportunity Area, the redevelopment of site would have been less likely. However, as the site has been identified as an Opportunity Area, it is more than likely that another developer would propose to develop the site to a similar capacity.
158. Layouts and uses: The design approach to the site was to assess how the proposed design would fit into a wider 'masterplan' for the surrounding sites. At the concept design stage, the applicant's architects prepared a diagram of the site with north-south and east-west routes which linked to the Old Kent Road and surrounding developments. By utilising this diagram, a simple layout plan was developed which identified locations for buildings and opportunities for public open space. From the concept design stage the broad principles for the scheme were generally agreed. Other options could have included providing less public realm for example.

159. Alternative sites were not considered, but given the location of the application site in the Old Kent Road Opportunity Area, as identified by the London Plan (2016), this is considered an acceptable approach.

#### Cumulative impact assessment

160. The 2017 EIA Regulations (as amended) require the assessment to consider the likely significant effects of the proposed development in the context of other local developments likely to come forward, as well as the cumulative effects that may result from the scheme as well as other developments. The submitted scheme has taken into account approved developments at Ruby Triangle, Nye's Wharf, 49-53 Glengall Road, and Land at Cantium Retail Park. This is considered appropriate.
161. Each of the topic chapters of the ES include a section documenting the assessment of the likely significant cumulative effects of the scheme and the committed developments. These are summarised in the ES and discussed in more detail where relevant in this report. The ES does acknowledge that there would be some adverse impacts caused by the cumulative impacts. Some of these impacts would be temporary and short term i.e. from demolition and construction activity and associated impacts on transport and noise. Some impacts would be long term i.e. after the proposed development has been completed. These include:
- A beneficial effect to the human health of local residents, future occupiers and construction and maintenance workers through remediation of any land contamination;
  - A permanent, local, beneficial effect to the character of the site due to its scale, appearance, legibility and the new public realm and public rights of way;
  - A beneficial effect from increased number of jobs and local spending;
  - The provision of affordable housing, reduced crime; and improvement in equality, culture and amenity; and
  - Changes to daylight and sunlight levels at Latona Road, Denstone House, Greystoke House, Peckham Park Road, Ednam House, Northfield House and Haymerle Road.
162. These impacts are discussed in relevant sections of the report.

#### **Affordable housing and Development Viability**

163. The proposed development overall would provide 40% affordable housing. At 35%, this would comprise of 25% social rented housing and 10% intermediate housing to reflect the draft NSP Policy P1, plus an additional 5% of intermediate housing using grant funding. The 40% offer represents a significant increase over the 25% offer originally submitted by the applicant, and would deliver up to 520 affordable homes to the boroughs housing stock.
164. The Southwark Plan saved policy 4.4 requires at least 35% of all new housing as affordable housing. Of that 35%, there is a requirement for 50% social housing and 50% intermediate housing in the Old Kent Road Action Area. The adopted London Plan 2017 sets a strategic requirement of 60% social housing and 40% intermediate housing. The emerging NSP Policy P1 sets a requirement for a minimum of 25% of all the housing to be provided as social rented and a minimum of 10% intermediate housing to be provided, this equates to 71.5% social housing and 28.5% intermediate housing. Overall (taking both the Detailed Component and the Outline

Component), the proposed development would provide 25% social rented and 10% intermediate housing at 35%, with an additional 5% top up of intermediate housing. Accordingly, the proposed development is in accordance with the emerging New Southwark Plan.

165. The requirement for social housing set out in the New Southwark Plan is higher than the London Plan and the saved Southwark Plan policy given the acute need for social housing in Southwark. Approximately 57% of the borough's total affordable housing need is for intermediate housing to meet the housing needs of lower and middle income residents. However, the most acute affordable housing need is for social rented housing to meet the needs of homeless households living in unsuitable temporary accommodation such as bed and breakfasts or overcrowded conditions. Overcrowding is strongly related to poor physical and mental health and can strain family relationships. Children in overcrowded homes often achieve poorly at school and suffer disturbed sleep. Social rented housing is vital to social regeneration as it allows residents who cannot afford suitable market housing to remain close to their families, friends and employment. For this reason draft Policy P1 of the NSP requires a minimum 25% of homes to be provided as social rented housing which the proposed development complies with.
166. In accordance with the council's Affordable Housing SPD, rooms that are over 27.5sqm have been counted twice for the purposes of calculating affordable housing, as demonstrated in the table at paragraph 168 below. This accounts for large open plan living room spaces that include kitchens and dining areas.
167. In total, 1223 habitable rooms would be provided in the Detailed Component. The development would provide a total of 452 affordable habitable rooms which would equate to an overall provision of 36.9%. Whilst this is below the overall figure of 40%, the Outline Component would provide additional affordable housing to compensate to ensure the delivery of 40% affordable housing overall. The level of provision would exceed the minimum target of 35% and is therefore fully policy compliant and a very positive aspect of the scheme. Viability information has been submitted which supports the delivery of the quantum of affordable housing proposed.
168. With regard to tenure split in the first phase, out of the 452 affordable habitable rooms, 332 would be social rented (27.1%) and 120 would be intermediate shared ownership (9.8%). This exceeds the requirement for 25% of homes to be social rented.

Table: Detailed component affordable housing mix

Tenure	Units		Additional hab rooms over 27.5sqm	Hab rooms	
	No.	%		No.	%
Private	289	68.8%	31	771 (31+740)	63
Social rent	83	19.8%	56	332 (56 + 276)	27.2
Intermediate	48	11.4%	0	120	9.8
Total	420	100	130	1223	100

169. The social rented units for the Detailed Component would be delivered in Building B10 and the intermediate units would be delivered in Building B9.
170. The Outline Component affordable housing mix has yet to be determined since these specific details would be determined on a plot by plot basis under the reserved matters applications. It would follow the same principles as the Detailed Component in that an overall percentage of at least 40% would be delivered of which 35% would be at 25% social rent and 10% intermediate with an additional 5% intermediate to increase the overall provision to 40%. The Outline Component would also compensate for the Detailed Component which at 36.9%, is 3.1% below the 40% overall target provision.
171. The Section 106 legal agreement would secure the delivery of these units, including clauses to prevent the occupation of more than 50% of the private apartments until 50% of the affordable units are completed in any phase, and a clause to prevent more than 90% of the private sale apartments being occupied in any one phase across until affordable housing of that phase is complete. In line with the Mayor's Affordable Housing and Viability SPG, an early review mechanism would be secured by the Section 106 agreement, which would come into effect if the development does not substantially commence within 24 months. The review would determine whether the viability of the development has improved during that time, and accordingly whether it could deliver any more affordable housing. However, it should be stressed that the overall quantum of 40% would remain as the minimum level of provision. The review mechanism would capture any increase should the development be able to support it. No late stage review has been secured, as the scheme re-provides the existing commercial floorspace on the site and the 40% affordable housing offer therefore exceeds the 35% GLA threshold level.
172. A contribution of £68,822.00 (a charge of £132.35 per unit on an assumed provision of 520 affordable units which is 40% affordable housing based on 1300 units) has been agreed towards affordable housing monitoring and maintained provision of these units, and would be secured by the legal agreement.

### Development viability

173. Southwark's Development Viability SPD requires a financial viability appraisal to be submitted for all planning applications which trigger a requirement to provide affordable housing. The financial viability appraisal should identify the maximum level of affordable housing that can be sustained and justify any proposed departures from planning policy requirements.
174. This application is therefore accompanied by a viability appraisal, which was reviewed by independent consultants on behalf of the council. An addendum letter was also received from the applicant during the course of the application advising of the increase to the affordable housing offer from 35%, to 40% which involves the conversion of 5% private housing units to 5% shared ownership units.
175. The applicant's original appraisal assumed that the scheme would deliver 35% affordable housing, which the applicant considered would generate an Internal Rate of Return (IRR) of 7.88%. IRR has been used by the applicant as a measure of return here because of the scale of the development and the length of time it would take to construct the development. The council's consultant made some changes to the inputs which resulted in an improved profit level of 8.20% IRR, which is still significantly lower than the target of 12% to 13% IRR adopted by the GLA.
176. On the basis of the improved affordable housing offer of 40% which includes 5% grant funding, the council's consultant re-ran the appraisal and this has also resulted in a return that is significantly lower than accepted target levels, with 8.61% IRR. It has resulted in a slight improvement in the IRR from 8.20% at 35% affordable housing (no grant) to 8.61% (40% affordable housing with grant). However, the council's consultant has advised that the scheme has potential to achieve higher sales values and when taking into account higher sales values (up to 5% per annum alongside cost inflation of no more than 3% per annum), the development could deliver returns up to 13.10% IRR. Expressed as a percentage of GDV, this would equate to 14.69% profit, which is just lower than the range of 15% to 20% commonly adopted.
177. The scheme includes the provision of a large number of amenities, including the public spaces at ground floor level. These provisions would help it to exceed the value of comparable schemes nearby. The site would also benefit from the wider regeneration of the area, including the Bakerloo Line extension, which would boost sales and have a major impact on the area. Consultation on the BLE has been undertaken and is ongoing and construction could start in 2023 and thus the scheme would be likely to directly benefit from increases in residential pricing in the longer term.
178. Nevertheless, the council's consultant has therefore confirmed that the proposed provision of 40% affordable housing which includes grant funding, exceeds the maximum reasonable proportion that the scheme can support at present. The development would need to achieve higher sales values to achieve returns of up to 13.10% IRR and 14.69% profit on GDV.

### Conclusion on affordable housing

179. In conclusion, the level of affordable housing proposed is a very positive aspect of the proposals. The scheme would deliver 40% affordable housing overall which would be viable with sales values increasing over time. The 40% affordable housing offer is therefore considered deliverable on this basis and terms to secure the

affordable housing would be included in the legal agreement, together with an early stage review mechanism.

### **Design, layout and impact on townscape views and heritage assets**

180. Strategic Policy 12 of the Southwark Core Strategy (2011) states that all development in the borough will be expected to “achieve the highest possible standards of design for buildings and public spaces to help create attractive and distinctive places which are safe, easy to get around and a pleasure to be in.” Saved Policy 3.12 ‘Quality in design’ of the Southwark Plan asserts that developments should achieve a high quality of both architectural and urban design, enhancing the quality of the built environment in order to create attractive, high amenity environments people will choose to live in, work in and visit. Saved Policy 3.13 of the Southwark Plan asserts that the principles of good urban design must be taken into account in all developments. This includes height, scale and massing of buildings, consideration of the local context, character and townscape, local and strategic views and resultant streetscape. Policy 7.7 of the London Plan (2016), ‘Location and Design of Tall and Large Buildings’ and Saved Policy 3.20 of the Southwark Plan set out design requirements for tall buildings, all of which are discussed in further detail in the following paragraphs.
181. The draft design policy in the New Southwark Plan includes P12, Design Quality and P14 Tall Buildings. P12 states that development must provide, amongst other things, high standards of design with appropriate fabric, function and composition. P 14 sets out a series of tests for tall buildings (defined as significantly taller than surrounding buildings or their context). It also states that the highest tall buildings will be located in areas where there is the greatest opportunity for regeneration, including opportunity Areas, such as the Old Kent Road.
182. As discussed elsewhere in this report, this planning application is submitted as a hybrid planning application to seek “detailed” planning permission for Phase 1 (the Detailed Component) and “outline” planning permission for Phase 2 and Phase 3 (the Outline Component). As such the application is supported by Parameter Plans, a Design Specification and a set of Design Principles for Phase 2 and Phase 3. The Parameter Plans and Development Specification describe the key elements of the proposal. The Design Principles establish standards for how the buildings would form streets and give enclosure to public spaces. Both are supported by illustrative material in the Design and Access Statement. Design issues relating to both the “Detailed Component” and “Outline Component” parts of the application will be discussed in the following paragraphs.

### Site Layout

183. In its current form, the site is a barrier to both north-south and east-west pedestrian movement. People have to use Glengall Road or Peckham Park Road for north – south movements and go through the Unwin and Friary Estate for east – west movements. This means that the existing community to the south is isolated from the amenities of the Old Kent Road, and there is no direct connection between Burgess Park and the Old Kent Road. Furthermore, as Latona Road is stopped up as it enters the site, the Friary and Unwin estate is used for east-west vehicle movements.
184. The site and the areas immediately surrounding it offer very little in terms of greenery or vegetation (the exception being an underused strip of land to the south of the site, bordering Latona Road). The site is however very close to Burgess Park.

185. The former Grand Surrey Canal used to run through the site, before it was infilled in the 1970s. There is some heritage significance to this alignment, and a noticeable difference in site levels of over 2m remains within the application site.
186. Most of the existing buildings on the site are of no architectural or historic significance. There are however, four existing buildings and structures on the site that are of note. These are:
- 19<sup>th</sup> Century brick chimney on Acorn Wharf;
  - 19<sup>th</sup> Century stable building at entrance to Acorn Wharf;
  - 19<sup>th</sup> Century timber mill on Acorn Wharf; and
  - 20<sup>th</sup> Century building directly adjacent to Space Studios (the Former Pramworks).
187. These are discussed in further detail in the Conservation section of this report.
188. The design principles behind the proposed masterplan are welcomed by officers. These principles are as follows:
- Identify a clear hierarchy of pedestrian and vehicular routes across and around the site;
  - Develop a street and building layout which would function as a piece of legible townscape; and
  - Provide an improved interface with the Unwin and Friary estate to the south of the site.
189. These principles have been applied to the design of the proposed masterplan as follows. A new east-west connection would be created through the site along the approximate alignment of the former Grand Surrey Canal. This would form the 'spine' of the development and deliver the Linear Park envisaged in the draft OKR AAP. A series of north-south connections would cross the Linear Park in locations that would knit the site back into the surrounding urban grain and respond well to pedestrian desire lines. The north-south links would be assigned a role in a hierarchy of routes that would see the central route defined as the 'main' north-south route. Where this route intersects the Linear Park, a new Central Square would be created. A combination of retail and work space, complementing that recently approved in the proposed development at the Cantium Retail Park, and also reflecting the nature of the site as a place of work and industry, would front the linear park and the square. In quieter parts of the masterplan, the ground floor uses would be residential. This approach would emphasise the proposed hierarchy of routes and help generate different places with different characters along the length of the linear park. For example, the base of Building B7 – fronting onto the council's proposed Frensham Street Park - would be residential, offering something of the character of a traditional London Square to the new open space.
190. On the whole, the buildings that would have residential frontages at ground floor are in the outline part of the application. It is however expected that they would have frequent doors and windows to ensure activity and natural surveillance of the street.
191. The commercial and retail frontages would vary depending on the nature and use of the building. For example, the base of Building B10, the linear building fronting onto the new square, would be occupied by two storeys of employment floor space, so the proposed frontage explores the potential of 'windows into working', whilst Building B4 (the tallest tower) would have a double height, visually open retail base.

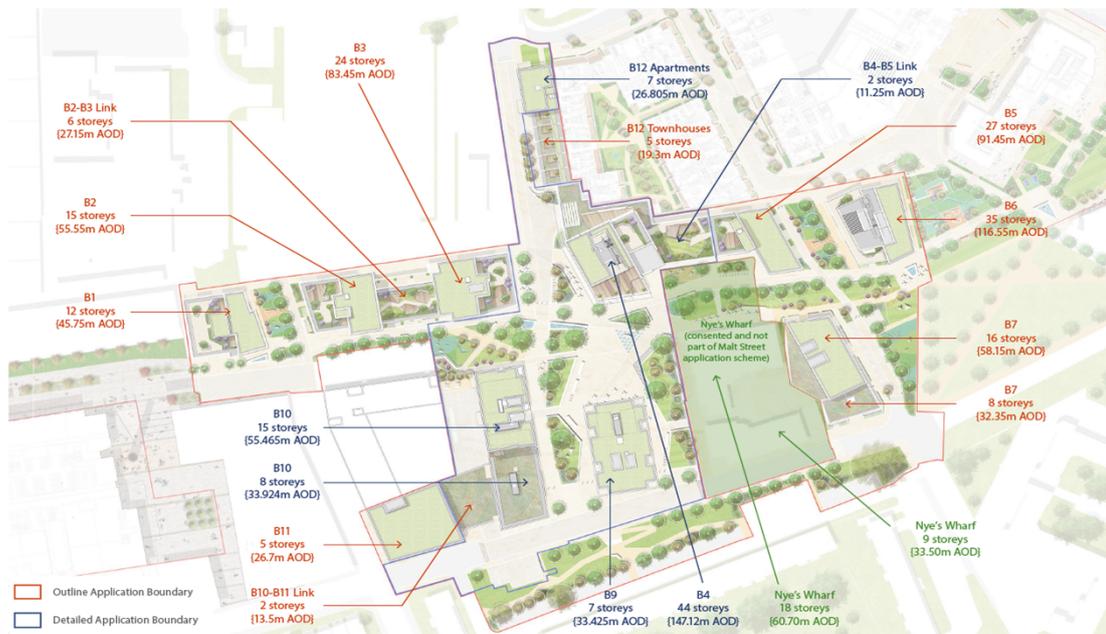
The base of Building B9, the stand-alone pavilion building on the southern side of the new Central Square, would be a single storey commercial use, proposed as an art gallery in the material submitted. This ground floor in particular would have a dynamic relationship with the Central Square, and as such, would be predominantly glazed. Where there are areas of inactive frontage throughout the scheme, they are located sensitively, such as to the rear of Building B9, where it backs onto the approved Nye's Wharf scheme.

192. Vehicular movement would not be permitted east-west along the Linear Park, and would be tightly controlled north-south (emergency vehicle access only), meaning that the vast majority of the park would be completely car free. The servicing strategy has been designed to fit in with this approach.
193. The main vehicular and pedestrian entrance to the site would be from Malt Street to the north. The tallest tower (Building B4) would sit on this route, where it meets the Linear Park. Its footprint would be angled to open up views to the new square.
194. The applicant proposes to create a sculpture park within the public realm at Malt Street. Their plan entails the permanent display of a selection of pieces, complemented by additional changing pieces. This has been discussed with officers on numerous occasions, and whilst in principle the idea of incorporating art, including the work of local artists into the scheme is welcomed, there are concerns about the way in which this is currently proposed. Public art need not only be sculptural, and by restricting the offer in this way, many local artists may be excluded. The selection of permanent pieces runs the risk of becoming dated or stale, and doesn't feel particularly radical or unique. Given the thriving artistic community in the area, there is an opportunity to do something really exciting here. It is therefore proposed that instead of constructing a purpose-built, physical sculpture park, the Section 106 should secure the submission and ongoing review of a Public Art Strategy for the entire public realm. This should set out, to the satisfaction of the council, factors such as how local artists would be engaged with, the terms under which their work will be displayed, and how often new work will be exhibited. The section 106 should also require the applicant to monitor the strategy and report progress to the council periodically. If it is not meeting the stated aims, it should be revised accordingly.
195. This approach may then be extended along the entire length of the Linear Park, under the control of the Linear Park Management Company, rather than being artificially constrained within the demise of the Malt Street site. The proposed commercial use in the base of Building B9, which it is proposed could be an art gallery, would be ideal for the administration of such a strategy, whilst also holding the envisaged exhibitions, competitions and art fairs and so the inclusion of this space could also form part of the s106 art strategy. This approach would allow the applicant to deliver their vision for Malt Street to become synonymous with art and become one of London's most interesting cultural attractions without the work on display becoming stale, dated or no longer relevant. It would also ensure the ongoing support of local artists, designers and creators, in line with commitments already made by the applicant. This would be considered a significant regeneration benefit of the proposals.
196. Space Studios would remain on site in their current building (to the west of the site boundary), which as stated above is identified in the draft OKR AAP as a building of townscape merit. There is a vacant building, known as the Former Pramworks, is immediately to the south of Space Studios (inside the site boundary), and is also identified in the draft OKR AAP as being of merit, would be demolished and

replaced. The impacts of this on heritage significance and discussed in detail below. In general though, the opportunities presented by the retention of both the building and the creative industry adjacent to the site have been captured in a proposed commercial cluster to the western side of the development. At the centre of this commercial cluster would be an intimate working courtyard, which would contrast with the open character of the new square and reflect the industrious heritage and character of the existing area. In practical terms, it would allow for the activities within the commercial studio spaces to spill out into a working and serviceable external space. Towards the east of the site, a more residential focus is proposed, albeit with retail uses fronting much of the Linear Park. Towards the centre of the plan, around the new square, would be a retail cluster.

197. In conclusion on site layout, the proposed development would represent substantially improved connectivity and permeability for the area, and a dramatic increase in public realm. These are both key requirements of the draft OKR AAP in relation to this site. The positions of the proposed links respond well to the existing desire lines, and would be designed to encourage walking and cycling. The site layout has been developed with full and careful consideration of other emerging and approved development proposals on neighbouring sites.

### Height, Scale and Massing



198. The proposed massing strategy is based around four main building typologies:
199. Tall landmark buildings: The tallest building- Building B4, (44 storeys) would sit to the east of the main north-south pedestrian route and to the north of the proposed square. This positioning is intended to allow the tall building to benefit from commensurate open space provided by the square whilst also acting as a marker, signifying this new civic space within the wider urban context. The north-eastern most building Building B6 (35 storeys) is also intended to fulfil a similar function, given its generous open space setting fronting on to the council's proposed Frensham Street Park adjacent to the site. Building B4 is submitted in detail. Building B6 is submitted in outline.

Image: Building B4



200. Linear Park Frontage: The other buildings that front onto the Linear Park (Buildings B1, B2, B3, B5, B7, B10) would vary in height from 10 storeys to 27 storeys. These buildings would provide enclosure to the park and represent the majority of the new built form;
201. Small landmark building: This building - B9 (seven storeys) would define the new Central Square and sit opposite the tallest proposed building. It is designed as a stand alone podium building and would have an active use, potentially an art gallery, at ground floor.

Image: Building B9



202. Townhouses: (Building B12) - A row of three storey townhouses would line the entrance to the site from the north, and back on to the approved scheme at the Cantium Retail Park.
203. As part of the commercial cluster described above, there would also be stand-alone commercial Building B11 (five storeys), which would sit adjacent to Space Studios. A brief summary of the role of each building in the overall height strategy for the site is set out below. Detail design of the tall buildings in the Outline Component of the application would be assessed under Reserved Matters applications, but the Parameter Plans under consideration would establish overall maximum heights. As a result, the overall height strategy across the proposed masterplan has been agreed. Officers are of the view that this strategy is appropriate, and accords with existing and emerging policy. A brief summary of this is set out in the table below.

<b>Building</b>	<b>Proposed height</b>	<b>Commentary</b>
<b>Detailed</b>		
Building B4	44 storeys	The primary landmark building of the scheme, located on the main axis into the proposed masterplan, at the point where this important new north-south route intersects with the Linear Park, and marking the location of the new Central Square and potential art gallery.
Building B4-B5 link	2 storeys	
Building B9	7 storeys	Height limited to allow good daylight and sunlight levels into the square (as Building B9 would be on southern edge). Also set up as deliberate contrast to Building B4 (44 storeys) on the north side of the square, giving a

		dynamic quality to the space.
Building B10	Part 8 storeys, part 15 storeys	Variable mid height linear building to complete the eastern side of the square. The eight storey part would respond to the scale of the Unwin and Friary estate to the south of the site. The 15 storey element would represent the mid height between the B4 tower and the B9 pavilion building.
Building B12	7 storeys (apartment building)	Increase in height when compared with the town houses in order to mark the northern entrance to the site, without creating an unbalanced composition along Malt Street.
<b>Outline (based on illustrative proposals, and within maximum height parameters submitted)</b>		
Building B1	12 storeys	Mid rise building to the north of the Linear Park.
Building B2	15 storeys	Mid rise building to the north of the Linear Park.
Building B2-B3 link	6 storeys	Shorter building linking Building B2 and B3 to provide variety in scale.
Building B3	24 storeys	Tall building forming a landmark gateway at the entrance to the Linear Park and new Central Square from Malt Street to the north.
Building B12	5 storeys (townhouses)	Town houses lining the entrance to the site and backing onto the townhouses on the approved scheme at Cantium Retail Park.
Building B5	27 storeys	Tall building, completing the landmark composition with Building B4.
Building B6	35 storeys	Tall building marking the corner of the new Frensham Street Park and the point at which the Linear Park leads into the new Central Square and destination use proposed in the approved scheme on the Cantium Retail Park site. As such, this is a particularly important node within the Linear Park, worthy of a landmark building.
Building B7	Part 16 storeys, part 8 storeys	Mid rise building providing enclosure to the Frensham Street Park.
Building B11	5 (commercial) storeys	Responds well to the scale of the neighbouring Space Studios building.
Building B10-B11 link	2 storeys	Creates variety in the building form and massing.

204. The heights of the tall buildings in particular would mark a step change in the scale of the surrounding area. The massing strategy is however in line with the emerging policy set out in the draft Old Kent Road AAP (acknowledging its very limited weight), The London Plan (2016) and the Southwark Core Strategy and Local Plan. The tall buildings have been arranged to allow for as much space between them as possible, ensuring that they would not appear to coalesce when viewed from a

distance. This also ensures that good levels of sunlight and daylight would reach the public realm. The relative heights and the way in which they would be distributed across the site would result in a well articulated composition of towers defining the new public realm proposed and serving an important landmark role identifying the entrance to the Linear Park and the location of a new civic square and potential destination use.

205. The design of the tall buildings submitted in detail would be exemplary, with careful consideration of their impact on the skyline. They would all have clear vertical emphasis; well defined bases, middles and tops; and well considered fenestration and detailing. The tallest building (Building B4) would also have unique and well articulated top that would create a distinctive silhouette on the skyline. The design of the tall buildings submitted in the Outline Component would be considered under Reserved Matters applications).
206. All of the proposed buildings, but particularly Building B4 (detail) and Building B6 (outline), would be substantially taller than those in their existing surroundings. As such, they would be defined as tall buildings in the adopted London Plan (2016). Policy 7.7 of the 2016 London Plan, 'Location and Design of Tall and Large Buildings', states that tall buildings should be limited to sites in the Central Activity Zone, Opportunity Areas, areas of intensification or town centres that have good access to public transport.' Furthermore, London Plan Policy 2.13 requires development in Opportunity Areas to optimise residential and non residential output densities, meet or exceed minimum housing and employment guidelines and support wider regeneration objectives. Annexe 1 of the 2016 London Plan sets out the specific requirements for the Old Kent Road Opportunity Area, identifying it as having significant potential for residential- led redevelopment. As such, it is considered that the Old Kent Road Opportunity Area is, in principle, an appropriate location for tall buildings which optimise housing delivery and regeneration benefits. The proposed development is considered to achieve both, whilst also meeting the other requirements of London Plan Policy 7.7, which are as follows:
- Generally be limited to sites in the Central Activity Zone, opportunity areas, areas of intensification or town centres that have good access to public transport;
  - Only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building;
  - Relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm (including landscape features), particularly at street level;
  - Individually or as a group, improve the legibility of an area, by emphasising a point of civic or visual significance where appropriate, and enhance the skyline and image of London;
  - Incorporate the highest standards of architecture and materials, including sustainable design and construction practices;
  - Have ground floor activities that provide a positive relationship to the surrounding streets;
  - Contribute to improving the permeability of the site and wider area, where possible;
  - Incorporate publicly accessible areas on the upper floors, where appropriate;
  - Make a significant contribution to local regeneration;
  - Not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunication interference; and
  - Not impact on local or strategic views adversely

207. This policy also states that the impact of tall buildings proposed in sensitive locations, including the settings of conservation areas and listed buildings should be given particular consideration. The nearest Conservation Area to the Malt Street site is the Glengall Road Conservation Area, approximately 125m from the site at its closest. Given the heights of the buildings proposed, they would also be visible from a number of distant sensitive locations, including from the settings of conservation areas and listed buildings. This is discussed in more detail below, where the submitted Townscape and Visual Impact Assessment (TVIA) is considered in detail. The following paragraphs take each of the other requirements of London Plan Policy 7.7 in turn.
208. The proposed tall buildings would be limited to a site within an opportunity area. The character of the area would not be adversely affected by the scale, mass or bulk of the tall buildings proposed because this area is not generally considered sensitive to change of this type. The existing nature of the site is defined by disused industrial land, which, as an overall townscape, is not worthy of protection. Its replacement with a scheme of high quality architectural and urban design is considered a significant public benefit of the proposals.
209. The proposed tall buildings would relate well to their surroundings, particularly at street level, with active frontages, increased connectivity and permeability and a new public open space. The urban grain of the area would be significantly enhanced, with the stitching together of existing and proposed streets and open spaces. The sensitively detailed architectural design of the tall buildings submitted in detail, including tower B4, would respond sympathetically to the existing local townscape, whilst introducing a new high quality aesthetic. There is more detail on this below. The detail design of the tall buildings submitted in outline would be expected to follow suit.
210. The proposed building heights would improve the legibility of the area by signifying the location of the new Linear Park and Central Square. Furthermore, as a result of the new public realm, art gallery, public art strategy, work space and significant retail offer, it is likely that this area would become a focus for both professional and leisure activity. As such, it would become a point of civic significance, worthy of landmark status. The design proposed would enhance the skyline and image of London with the tallest building forming a focal point with a strong vertical articulation, a well articulated top and well defined rhythm and order.
211. Where submitted in detail, the proposals demonstrate the highest standards of architectural design and incorporate the highest quality materials. The elevational strategy and material palettes are discussed in more detail below. In summary, the Building B4 tower in particular, would appear slender on the skyline, and its metallic finish would make it stand out against the surrounding predominantly brick buildings. The facades would be articulated with vertical metal fins to emphasise verticality. The overall building form would be broken into two overlapping vertical elements, and the angular plan form would avoid large flat elevations. In order to secure design quality, planning conditions requiring detailed drawings, material samples and full scale (1:1) mock ups are recommended. It is also clear from the submitted energy and sustainability strategies that the proposals would incorporate high quality sustainable design with the inclusion of photovoltaic panels and the draft construction management plan demonstrates commitment to excellent construction practices.
212. The positive nature of the ground floor activities, their relationship to the surrounding streets and the vastly increased public realm and permeability proposed has already

been discussed above. These aspects of the proposals represent significant public benefits. The proposed development would not incorporate any publicly accessible areas on the upper floors, but is noted, that the London Plan (2016) only requires this “where appropriate”. There may be some opportunity to secure this in tall buildings such as B6, when they come forward as Reserved Matters applications. There would be amenity spaces for residents at upper levels throughout the scheme. This would include some roof top gardens for residents which would give a soft, green layer of articulation to the appearance of the buildings.

213. The contribution that the scheme would make to local regeneration would be very significant. As has already been identified throughout this report, this would include the provision of significant contribution to the borough’s housing stock, including affordable housing; a significant increase in jobs and new employment spaces; the delivery of the new Linear Park; a public art strategy and a new art gallery (or similar).
214. The impact of the proposed development on microclimate, wind turbulence, overshadowing, noise, aviation, telecommunication interference is all assessed in the submitted ES and presented elsewhere in this report. In each case it is concluded that there would be no significant adverse impacts.
215. Finally, there would be no unjustifiably harmful impact on local or strategic views, as discussed in more detail below. It should be noted however, that there would be a small number of sensitive locations from which this needs a carefully balanced decision.
216. As the most recently adopted document in the Local Plan, and the only document adopted after the Old Kent Road was designated as an Opportunity Area with significant potential for residential-led redevelopment, it is considered that these London Plan (2016) policies in relation to tall buildings are more relevant than those in Southwark Plan Saved Policy 3.20 dating from 2007. Nevertheless, the proposed development has also been assessed against the requirements of this saved policy. Saved Policy 3.20 requires any building over 30 metres tall to ensure that it:
  - Makes a positive contribution to the landscape; and
  - Is located at a point of landmark significance; and
  - Is of the highest architectural standard; and
  - Relates well to its surroundings, particularly at street level; and
  - Contributes positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views.
217. The proposed development would make a very positive contribution to the landscape through the creation of a significant proportion of the Linear Park, which is crucial to the draft OKR AAP vision for the area. New east-west and north-south connections would also be introduced that would respond well to the existing urban grain and desire lines. Connections would be well designed, with generous space for pedestrians and good quality landscaping (to be secured by condition). The outline part of the application sets out the potential for substantial enhancements to the landscape space outside the Friary Estate. This would be a further substantial improvement to the area.
218. The proposed tall buildings are at a point of landmark significance, particularly Buildings B4 and B3, which would mark the point where a major new new-south route would cross the new Linear Park. The new Central Square and potential

destination use (art gallery) would also make a significant contribution to the landmark significance of this location.

- 219. In conclusion on height, scale and massing, the proposed buildings would be consistent with the draft OKR AAP. The architecture would be of a high quality. The proposed buildings would have a clear sense of order, with well articulated forms and elevations of a regular and ordered quality. They would contribute positively to the London skyline, with distinctive and well resolved tops, particularly to the Building B4 tower.

Architectural Design and Materiality

- 220. A common material palette is proposed across the scheme, but it would be applied in different combinations depending of building typology and setting. The palette would consist of brick, metal, and concrete, in complimentary red, dark or light tones. This approach would result in a harmonious identity across the development, whilst allowing each different building to feel unique. Brick would be the dominant material throughout, with metal used sparingly to emphasise important features on key buildings and highlight key focal points.
- 221. The applicants design team have paid particular attention to the entrances to the buildings in order to ensure that they are legible within the public realm. They would all be clearly visible, and easily identified as either residential or commercial, and integrates within the architecture of the building above. None would obstruct pedestrian movement. Service entrances would be well integrated into the design.

Detailed Component

- 222. The Detailed Component of the application consists of four buildings – Buildings B4, B9, B10 and B12 apartments. These are generally located within the centre of site around the Central Square. They would be accessed from Malt Street in the north and Latona Road to the south. The Detailed Component of the proposal also includes the basement car park, energy centre and car park entrance ramp, B4 service yard, B4 ground floor link building and B10 service entrance.
- 223. The design of the buildings submitted in detail is summarised in the table below.

Key features of design	Material Palette	Illustration
<b>Building B4 (Tallest tower at north of new Central Square)</b>		
<p>The architectural concept behind this building is that it should reinterpret the horizontal route of the Grand Surrey Canal, into a vertical structure in the cityscape. The elevations would use reflective glass and metal to as a metaphor for the water of the canal, with the metal fins intended to read as ripples. The way in which the elevations would be broken up horizontally, with either red or bronze coloured metal fins, references the timber that would have been stacked in the historic wharfs.</p>	<p>Red and bronze colour PPC metal fins;                      Glazed spandrel panels;                      Glass cladding with thin dark grey metal profiles on corners;                      Dark grey metal for balconies, windows and window panels.</p>	

As set out in the draft OKR AAP design guidance (page 48), the base would be double height, predominantly glazed, with a vertically articulated metal and glass façade above. Verticality would be provided by a series of metal fins in a light red colour finish. The roofline would have a dynamic, multi-angled profile to give a unique form and silhouette to the building when viewed on the skyline. This would be echoed in the form of the garden room provided on the roof of the link building. Balconies would be enclosed by glass balustrades.

The angled floorplan would create an interesting building form, unique amongst its neighbours. It also ensures a good proportion of dual aspect units and avoids harmful overlooking conditions.



**Building B9: (Pavilion building at south of new Central Square)**

The facades of B9 have been designed to emulate the stacked timber that would historically have been found in the wharfs that occupied the site. Its building form would comprise of a simple cuboid floating over a light, transparent base, with cladding applied to a regular grid.

The base would be single height, predominantly glazed and transparent, set behind a colonnade. The ground floor is likely to be used as an art gallery. Residential units above clad in fluted metal panels in a titanium colour finish. The profile of the fluting would vary between panels, with some wide and some narrow. This would give a unique texture to the building, and result in an attractive variety of light and shade. The facades would be more solid than the taller buildings, with a greater horizontal articulation. This would result in a pleasing proportion and order for a building of this scale.

Metal bar balustrades would enclose the recessed balconies. Recessing the balconies and keeping the roof line very simple would emphasise the building's cuboid form and role as a pavilion in the Central Square.

White composite material or GRC for the grid structure;  
Two colours of bronze/titanium metallic PPC metal panels with two types of fin detail; and  
Dark grey metallic coloured PPC metal framing to full windows



**Building B10: (Linear building to west of the new square)**

B10 would provide a backdrop to the square, allowing the tower and pavilion to stand out. The upper parts of the elevations would be articulated as four separate elements on top of a consistent base. Each element would use a variation of the same material palette within a uniform brick grid.

The design would reflect the design guidance contained in the draft OKR AAP (page 100-101) and would also compliment the approved development on the Nyes Wharf site, using similar materials, height and articulation.

The base would be double height, with large punched windows offering views of the work being carried out inside. It would be finished in consistent dark grey brick in a stretcher bond. The four elements above it would be finished in different combinations of the grey and red brick. The corner element facing the square would be given a special treatment, clad in a vertically defined red brick cladding.

There would be a combination of projecting balconies with metal bar balustrades (predominantly to the lower building) and recessed balconies with glazed balustrades (predominantly to the lower part). Windows would have a regular order and vertical proportion. The top of the building would be relatively simple, finished with a flat brick parapet. This would contrast with the more dynamic roof profile of the tower, resulting in visual interest. It would also complement the orthogonal nature of the square onto which the building would front.

This building is based on a repeated module that can be varied in a number of ways. Dark brick for base façade; Red brick for feature façade; and Warm dark grey bronze metallic coloured PPC metal for balconies, panels, windows & soffits



**Building B12 (Apartment block fronting onto Malt Street)**

Note: the townhouses fall within outline part of the application

<p>The B12 apartment building would occupy the northernmost part of the site, marking the Malt Street entrance to the development.</p> <p>This building would be finished predominantly in mixed dark grey brick in stretcher bond, with a feature corner (south-west) in light brick. The windows would be highlighted with metal panels and window frames in titanium colour, reflecting the podium building in the public square. The projecting balconies would have metal bar balustrades.</p>	<p>Dark brick; Light brick; and Warm titanium metallic colour metal panels for window frames, balconies, infill panels, gates, residential entrances and servicing entrances.</p>	
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### Reserved Matters

224. In the Outline Component, the following matters are reserved for later determination:

- Appearance - aspects of a building or place which affect the way it looks, including the exterior of the development;
- Means of access - covers accessibility for all routes to and within the site, as well as the way they link up to other roads and pathways outside the site;
- Landscaping - the improvement or protection of the amenities of the site and the surrounding area. This could include planting trees or hedges as a screen;
- Layout - includes buildings, routes and open spaces within the development and the way they are laid out in relation to buildings and spaces outside the development; and
- Scale - includes information on the size of the development, including the height, width and length of each proposed building.

### Parameter Plans

225. The submitted Parameter Plans would guide and control the delivery of the reserved matters in the outline part of the proposals in order to ensure that it corresponds to the proposed illustrative masterplan. They control the following aspects of the proposal:

- Access points;
- Ground floor levels;
- The broad nature of the public realm;
- Ground floor land use;
- First floor land use;
- Upper floor land use (including the requirement for B1 to be commercial on all floors);
- Maximum building heights;
- Phasing;
- Maximum and minimum ground floor development plots; and
- Maximum and minimum upper floor development plots.

226. The Parameter Plans define, amongst other factors, the layout of each development plot, by establishing the maximum and minimum extents to which built fabric can be constructed (including projecting balconies). This is established for both ground and upper floors.

### Design Principles

227. The submitted Design Principles document sets out guidance to inform the detailed design of the buildings and open spaces in the outline part of the application. The guidance is divided into Mandatory and Non-Mandatory requirements and is intended to be read alongside the Parameter Plans and the Development Specification. Together, these three documents set the standards for future Reserved Matters applications and give confidence that they will be of high quality design.
228. The Design Principles include guidance relating to illustrative 'base' and 'feature' façade types, both of which are of high quality, with good proportions, order and rhythm, recessed window details and high quality materials. They also feature variety within the detailing, such as soldier courses above window openings and recessed brick insert panels. There is a model to guide which buildings should be predominantly dark brick, which should be light and which should be red brick. The distribution across the site would establish sufficient variety and visual interest whilst still securing a common identity throughout (including with the detail part of the submission).

### Tall Building (Building B6):

229. Given the height proposed for Building B6 (36 storeys), officers were not fully satisfied with the level of detailed design information originally submitted. As a result, an addendum to the Design Principles was submitted to provide more detail and specific mandatory guidelines. Further design principles were therefore submitted in an addendum to the Design Principles document. Whilst this effort is welcomed, officers remain concerned about these principles, particularly the quality of the illustrative designs shown in a number of the visualisations. A condition is therefore recommended that should clearly state that, notwithstanding this additional information, all matters remain reserved in relation to Building B6. The detailed design would be expected to be worked up in close consultation with officers when the Reserved Matters applications are submitted and the proposals will be put before Southwark's Design Review Panel.

### Townhouses (Building B12):

230. The mandatory requirements for the town houses include a clear hierarchy, composed of a base, a two storey middle and a simple flat roof, with a roof terrace, at third floor level. The Design Principles allow the levels at the base to vary in response to the surrounding landscape or detailed design, but the datum line at the top of the base must remain consistent. The base must be expressed coherently, but the placement of materials may vary within the overall structure of the façade. Building entrances must be legible within the public realm, and coherent along the length of the terrace. All entrances must be flush within the façade or recessed. There must be vertical emphasis to articulate each separate house in the terrace and the windows should form a consistent pattern across the façade. Areas for building services, such as louvres and ventilation grills, should be integrated within the overall façade design. A full roof terrace with screening and balustrades is required, and the Design Principles require the facades to step in from the boundary at each level to allow for natural daylight to penetrate into the rear internal spaces.
231. The mandatory guidelines for the town houses also state that the private front garden areas must be gated, and privacy screens must be provided between town

houses on shared boundary lines. Officers agree that appropriate boundary treatments would be required for these front gardens, which may include low railings and gates, but privacy screens in this location could have a harmful impact on the streetscape. It is therefore recommended that this is discussed further and resolved with officers when the Reserved Matters application(s) is submitted.

Linear Park frontage (B1, B2, B3, B5, B6):

232. The mandatory guidelines for the Linear Park frontage buildings require distinctive double height bases, possibly with a single storey colonnade. Where the base is commercial, this is required to be clearly expressed. As with the town houses, the levels at the base may vary in response to the surrounding landscape or detailed design, but the datum line at the top of the base must remain consistent. The base must be predominantly brick. The main entrances must be legible and coherent. All entrances are to be flush or recessed within the main building line. Podium service entrances must be integrated into the design of the façades. Above the base, the middle of the buildings must be distinct, whilst maintaining visual continuity with the lower and upper levels. The tops of the buildings must be distinct, whilst maintaining visual continuity with the lower levels. The tops must be designed as two or three storey elements.
233. The Design Principles require the primary cladding modules and window openings to form a consistent pattern across the façades of the linear park frontage buildings. They also require areas for building services, such as louvres and ventilation grills, to be integrated within the overall façade design. Drainage is to be either concealed within the building fabric (or in exceptions, integrated into the architectural language). In relation to balconies, both cantilevered (projecting) and recessed balconies are permitted, but projecting balconies are not permitted to wrap around corners of buildings. Balconies are not permitted to be solid, brick, coloured glass or coloured plastic materials, although it is recommended that a degree of flexibility could be applied to this when Reserved Matters applications are made.
234. The mandatory guidelines also require the expression of ‘feature facades’. This is described as corner components that should be distinct from the other facade types. The mandatory guidelines go on to state that this should be expressed in red brick in a “homogenous” manner. For these feature facades to be truly distinct, and offer visual excitement to the masterplan however, officers suggest that they are approached with more flexibility, and assessed for their own merits upon the submission of the Reserved Matters application(s).
235. The same conditions should be applied to the Reserved Matters as to the detailed elements of the design, including detailed drawings, material samples and 1:1 scale mock ups. Particular attention should be paid to the junctions between materials and building components, and the design of protruding balconies. Whilst the latter could successfully create texture and relief in the facades, they could also appear cheap if not detailed successfully.

Commercial (Building B11):

236. The mandatory design principles relating to the commercial building require Reserved Matters proposals to “carefully consider” the principles of the existing brick building in this location (which would be demolished) and those of the adjoining Space Studios building (to be retained). A predominantly horizontal arrangement of materials is required, with clear articulation between the lower building volume

(which must be in line with Space Studios) and any additional storeys on top. The windows are required to form a consistent pattern across the façade and officers would expect that consistent pattern to apply across both the new building and the neighbouring Space Studios building.

### Landscaping

237. In total, 3.1 acres of the site (54.5%) would be given over to public realm. Much of this would go to form the new Linear Park that would run east-west through the length of the site, forming a vital link in the draft OKR AAP vision for a green connection between Burgess Park and Old Kent Road itself, and then onwards to form the 'Greener Belt'. The Linear Park is identified as number 1. on the illustrative masterplan below. Other components of the landscape proposals would include:

1. Linear Park
2. Central Square
3. North-South green walk
4. Malt Street vehicular access
5. Basement car park access
6. Future North-South connections
7. Latona Road Street Scape
8. Unwin & Friary landscape improvements



238. Number 9. in the plan above refers to the previously approved landscaping at Nyes Wharf, and number 10. is the retained Space Studios.

239. The Linear Park is described in the submitted material as a “vibrant green space”. The strong line of trees to the north of the park lines the main pedestrian and cycle

route. The Linear Park would incorporate playable areas for 5-11 year olds and children over 12 years of age. This would include table tennis tables and a climbing wall for older children. There would be Sustainable Urban Drainage System (SUDS) features running along the length of the park, not only improving surface water drainage performance, but also ensuring that water is integrated into the landscape to reinforce the significance of the route of the former Grand Surrey Canal. Where appropriate, there would also be a zone outside the buildings into which the adjacent cafes and restaurants could put tables, or which adjacent work spaces could use as outdoor workspace. There is also potential for outdoor markets and events to be held in the space.

240. The design of the Linear Park landscape would reference the materiality of the canal and the former wharves and warehouses with the use of industrial, working materials such as weathered steel, hefty timber, cobbles and brick paving.

Image: Central Square



241. In line with the council's emerging vision for the entire length of the park, it is proposed as a predominantly linear space with a wider 'wharf' space coming off it to the north. This arrangement is inspired by the traditional form of canals like the Grand Surrey Canal, with the linear canal element feeding into wharfs and basins along its length. As noted above, access for motor vehicles would be tightly controlled. It has been designed to connect to the existing context and to other

proposed neighbouring developments. It would be publicly accessible at all times, as secured through the Section 106 Agreement.

242. The principles behind the design proposed for the Linear Park, as well as the ideas set out above are all welcomed. However, the council's Old Kent Road Regeneration Team are currently working on a Public Realm Strategy for the Linear Park. It would therefore be prudent to retain some flexibility in relation to the design of this feature. Planning conditions are therefore recommended to require detailed design of the Linear Park to be developed in conjunction with the council and submitted for approval. It is likely that this would include requirements for the space to become even greener in character, particularly in the new Central Square, and less formal in arrangement. It is also likely that a greater focus on community spaces and facilities will be required. The fact that much of the Linear Park is submitted in outline only allows flexibility for ongoing discussions with officers about emerging aspirations for the public realm.
243. In addition to the Linear Park, the Outline Component of the proposals includes an illustrative landscape design for Latona Road. This features a shared surface (for pedestrians, cyclists and emergency vehicles, deliveries and disable parking only) with generous green landscaping and a mini plaza outside Building B9 to link Latona Road into the new square. The character would be of a leafy and welcoming street with a number of street trees. The long term ambition is for Latona Road to extend through from east to west to connect Frensham Street and Haymerle Road. As a reinstated urban connection, this would be a significant public benefit of the proposal, taking traffic off the Friary and Unwin estate service road. It would also be designed to accommodate cyclists that wish to cycle at higher speeds, taking them out of the Linear Park. The Detailed Component part of the proposal would however work without this link being completed.
244. Biodiversity and ecology are also designed onto the proposed public realm, including the following:
- Diversity of habitat;
  - SUDS features;
  - Trees arranged to provide a linked canopy;
  - A mixture of native and non-native shrubs / herbaceous / grasses / and ferns;
  - Tree species providing nectar and fruit;
  - Bird boxes and bat boxes (to be controlled by condition).
  - Green and brown roofs; and
  - Plant species that are fit for purpose and suited to the site.
245. The proposals would result in the removal of all 22 existing trees and their replacement with trees that will provide benefit to the area for a longer time to come, including Avenue Trees, Parkland Trees and Street Trees. The species would be selected to provide greening to the streets, both proposed and for future links. All trees would be selected with regard to light levels, suitability for the urban environment, scale, wind deflection and biodiversity value.
246. The Design Principles for the Outline Component part of the scheme has set up guidelines for the interface between buildings and the public realm. The mandatory principles require residential privacy zones (where necessary), of at least 2m in depth, with a continuous common railing and edge planting. It is also mandatory for ground floor residential units to be designed as duplexes, which should be reflected in the street frontage. All ground floor homes must have their own front door access

from the public realm and access to communal areas.

247. Where the base of a building would be commercial, the Design Principles require the interface with the public realm to be immediate (i.e. no physical boundary). The frontage design should reflect the proposed use and floor to ceiling heights should allow for flexibility.
248. In terms of landscape and green amenity within building footprints, a variety of spaces are proposed, including both private and communal terraces, green biodiverse roofs and brown biodiverse roofs on the uppermost levels. Brown roofs would incorporate photovoltaic panels.

Design Review Panel:

249. The proposals were presented to the Southwark Design Review Panel in July 2018. The Panel generally endorsed the masterplanning of this proposal and expressed their confidence in the capabilities of the architects/masterplanners to deliver a high quality design.
250. However, they also expressed disappointment that the proposals had not been presented to them earlier in the process, as the best stage for review is the pre-application stage, not some months after the application has been submitted. Having said that the Panel still raised a number of issues which they felt the scheme should address post submission. These are discussed below.
251. Officer Response: Officers acknowledge the Panel's disappointment, and agree that the best time for review would have been during the pre application process. Whilst it is regrettable that this was not reviewed sooner, Officers are satisfied that the comments that the Panel made have been addressed. This is discussed in the following paragraphs.
252. The Panel endorsed the concept of the Linear Park and felt the proposal as a whole benefitted from this large urban gesture. They were keen to ensure that it was deliverable across the entire OKR10 site allocation (i.e. outside the Malt Street site boundaries). They welcomed the involvement of Fabrik Landscape Architects and were encouraged that the design principles established on this site had followed through into the design of the public spaces on neighbouring plots and sites. They also commented that the Linear Park has the potential to be the equivalent of the High Line in New York, combining industrial heritage, landscape design and urban design very successfully.
253. Officer Response: The council's Old Kent Road Regeneration team and currently in the process of producing a Public Realm Strategy that will control the design of the linear park across site boundaries. As a result, and as mentioned above, it is recommended that detailed design of the landscape is required by condition, with sufficient flexibility retained to ensure that this strategy can be implemented. It is also recommended that the Section 106 Legal Agreement requires the retention of Fabrik Landscape Architects (unless otherwise agreed in writing) through the detailed design of the scheme. Officers also note the Panel's recognition of the importance of industrial heritage in the Linear Park. This is discussed in further detail below, including the need for planning conditions to require the retention of an existing 19<sup>th</sup> Century chimney and stable building on the Acorn Wharf part of the site, and the integration of these features into the landscape design.
254. The Panel felt the public realm was dominated by hardscape and was not 'green'

enough. They challenged the designers to maximise the number of trees and truly green spaces in the Linear Park. They also encouraged the greater use of water and SUDS in the landscape. Its links to the route of the historic canal (albeit not in its original location) gave the Linear Park a well-defined character that tapped into the industrial heritage of the location. The Panel felt this aspect of the canal route had not been adequately integrated into the landscape design and it should be strengthened.

255. Officer Response: The need for the Linear Park to be a predominantly green space will be one of the key principles established by the Public Realm Strategy that the council's Old Kent Road Regeneration Team is currently working on. The conditions mentioned above requiring further detailed design of the Linear Park, specifically in response to this emerging strategy would ensure that this can be addressed. Given the timing of this emerging strategy, it is considered appropriate for this to be addressed by condition. As mentioned above, officers consider the Central Square could have a "greener" character and would look to deliver this through the approval of details process.
256. Whilst the Panel generally applauded the work that the design team have put into the Linear Park, they raised concerns about the impact that the Space Studios Yard would have on the Linear Park. At this western entrance to the Linear Park the Space Studios Yard, with its high wall, interrupts the Linear Park and constrains access to it from the west and Burgess Park. The Panel encouraged the Applicants to continue their dialogue with Space Studios and to try to resolve this issue to ensure that the Linear Park is successful in its principle aim to enable east-west permeability across the area.
257. Officer Response: Responses to the concerns of Space Studios are set out elsewhere in this report. Negotiations are ongoing and the design of the Linear Park does not preclude the integration of the yard in the future, but officers recognise the importance of this space for the operation of the existing business, and must balance this against aspirations for the public realm. This will also be addressed further in the emerging Public Realm Strategy. An option under consideration is for the yard space wall to be redesigned to offer "windows onto work" so that people could see into the space whilst maintaining its security.
258. The Panel questioned the need for a cycle route along the length of the Linear Park. In addition to the narrowing at Space Studios and the added requirement to provide emergency and pedestrian access to the park the need to also provide a dedicated cycle route in the park is likely to reduce further the amount of green space in the Linear Park. The Panel urged the designers to consider how they can re-direct the cycle route elsewhere on the site in order to ensure that the Linear Park remains a primary landscaped place.
259. Officer Response: An inclusive and safe approach to encouraging cycling is a key principle behind the regeneration of the Old Kent Road Opportunity Area. Whilst Officers understand the need to manage potential conflicts between cyclists and other users of the Linear Park, it is not considered appropriate to exclude them completely. The way in which they should be integrated will be addressed in the emerging Public Realm Strategy, and may require revisions to the landscape design when details are submitted via condition. One of the ideas being explored with the applicant is "traffic calming" the routes to ensure cycles are not going at speed.
260. The Panel raised a concern about the limited extent and variety of uses proposed at the ground floor. They questioned whether the proposal met the requirements of the

draft OKR AAP in relation to job creation. The success of the development (which is well set back from the OKR) will rely on its capacity to attract commercial activity away from the OKR along Malt Street to the public space and the Linear Park. To do this the development will need to activate the edges of the Linear Park and the main routes with commercial spaces including retail and work spaces which the current proposal proposes in limited areas. The Panel encouraged the applicants to maximise the commercial uses on the ground floor (including the provision of affordable business space) especially on the east-west route along the edge of the Linear Park as well as the north-south link from the Central Square to the Old Kent Road and especially along the Malt Street frontage.

261. Officer Response: Job creation is addressed elsewhere in this report. In relation to the active frontages and commercial uses at ground floor, this has been revised during the course of the application and officers are satisfied that there would be a good mix of commercial uses, work space and residential uses at ground floor. It is considered that workspace at ground floor is particularly important to contribute to the sense of Old Kent Road as a working and industrious area, unique amongst other places in London. As mentioned earlier in the report, the majority of the commercial space would be of a B1(c) light industrial specification with good servicing access. This is considered a positive aspect of the proposals. Servicing would be discreet and would not be obstructive. The design of the public realm itself will also ensure that activity is brought along this link between the Old Kent Road and Burgess Park.
262. The Panel noted that the proposal is centred on the main public space at the core of the development. As a result, Building B9 will play a very important role in the success of the development and the success of the main public space. At over 10-storeys tall and as a large footprint residential block, the Panel felt that it would dominate and overshadow the public space. The Panel challenged the Applicants to reconsider the scale and nature of this building because of its importance to the site and its effect on the public space. They suggested that B9 should be considered as a 'a 'jewel-like' element or pavilion building which will also be the focus of the new public space. In that respect they felt this building should be significantly reduced in size to 3 or 4 storeys (max) and designed as a one-off public building like an art gallery or a cinema. They also suggested that it could be subject to an architectural competition.
263. Officer Response: Building B9 would be seven storeys in height, which officers consider appropriate. The applicant has addressed its footprint and character in response to comments from the DRP. The footprint has been revised to ensure that it sits more comfortably as a pavilion in the square and in relation to the approved scheme on the neighbouring Nye's Wharf site. It would house public facing activities and uses on the ground floor, potentially a gallery, setting up a positive dialogue with the Central Square. Residential units are only proposed above this level. The design proposed is high quality, with sufficient variety in detail and finish to stand out from the other surrounding buildings, whilst still retaining the overall sense of place and identity.
264. The Panel asked the designers to look carefully at the sunlight/daylight study for the Central Square.
265. Officer Response: The sunlight/daylight of the proposed development is considered elsewhere in this report. Over 70% of the Central Square and Linear Park would receive two hours of sunlight on March 21<sup>st</sup>, exceeding the 50% target of the Building Research Establishments guide.

266. The Panel generally endorsed the masterplanning approach to the site. Whilst there were differences of opinion amongst Panel Members on the merits of some aspects of the individual buildings the Panel generally acknowledged that the application held some promise. They were satisfied with the direction of travel and the general aesthetic qualities of the proposed buildings and, whilst they were not able to look at every building in detail, they supported the design principles established on the site. They did however reiterate concerns that the proposal had not been presented to the DRP in time for them to consider it in detail. Going forward they asked the applicant to ensure that subsequent phases should return to the DRP as each plot comes up as a 'Reserved Matters' application. They endorsed the involvement of the design team in defining a vision for the site and they suggested that they prepare a set of Design principles or codes for the subsequent phases. The Panel also suggested that the applicant consider using other architects for subsequent phases – as had been done recently at Elephant Park – in order to ensure that the whole site did not appear to be dominated by a the design of one architectural 'hand'.
267. Officer Response: Positive comments about the quality of architecture are noted. Design Principles for the subsequent phases have been submitted and are discussed elsewhere in this report. Officers agree with the recommendation for Reserved Matters applications to be reviewed by DRP and the use of other architects for subsequent phases.

Impact on the Setting of Listed Buildings, Conservation Areas and Townscape

268. London Plan (2016) Policy 7.4, Local Character, states that development proposals should respond to their context, including buildings, opens spaces, street patterns and the historic environment and Policy 7.8, Heritage Assets and Archaeology, seeks to record, maintain and protect London's heritage assets in order to utilise their potential within the community. It states that development should conserve the significance of any heritage asset it affects. Southwark Core Strategy Strategic Policy 12, Design and Conservation, states that development should ensure that the significance of built heritage assets is conserved. Saved Policy 3.15, Conservation of the Historic Environment of the Southwark Plan (2007) states that development should preserve or enhance the special interest or historic character or appearance of buildings or areas of historical or architectural significance and Policy 3.18, Setting of Listed Buildings, Conservation Areas and World Heritage Sites states that the immediate or wider settings of designated heritage assets must be preserved. The NPPF (2019) requires Local Authorities to consider the impact of a proposed development on the significance of a designated heritage asset. Any harm to, or loss of, the significance of a designated heritage asset (including from development within its setting) should be categorised as either substantial or less than substantial. Substantial harm should only be permitted in exceptional circumstances. Less than substantial harm should be weighed against the public benefits of the proposal.
269. The application site does not sit in a conservation area and it contains no listed buildings. There are however, a number of conservation areas within 1km of the site, meaning that their settings could be impacted upon by the proposed development. These conservation areas include:

<b>Conservation Area</b>	<b>Distance from site</b>
Glengall Road Conservation Area	Approximately 125m north-west
Peckham Hill Street Conservation Area	Approximately 270m south-west
Trafalgar Avenue Conservation Area	Approximately 340m north-west

Cobourg Road Conservation Area	Approximately 375m north-west
Caroline Gardens Conservation Area	Approximately 500m south-west
Thorburn Square Conservation Area	Approximately 600m north
Sceaux Gardens Conservation Area	Approximately 920m south-west

270. Also within the area surrounding the application site are a number of Grade II listed buildings and structures, including the following:

- Former Camberwell Public Library and Livesey Museum;
- Statue of George Livesey;
- Mural at the Civic Centre;
- 2 – 9 Canal Grove Cottages;
- Gas standard lamp (adapted to electric light), Canal Grove;
- Eveline Lowe School (now Phoneix Primary Academy);
- 1 – 35 (odd) Glengall Road;
- 24-38 (even) Glengall Road;
- 1-9 Glengall Terrace;
- 25-43 Trafalgar Avenue;
- Celestial Church of Christ and attached wall and railings;
- Gasholder No. 13;
- Licensed Victuallers Benevolent Institution (Caroline Gardens);
- 127-151 (odd) Friary Road;
- 108 -124 Peckham Park Road (even); and
- Church of our Lady of Seven Dolours.

271. The Grade I listed Church of St Augustine is within 1km of the site (approximately 700m north-east).

272. Although of very limited weight, the draft OKR AAP also identifies buildings and features of townscape merit and buildings of architectural or historic interest. The following buildings, within the immediate vicinity of the site, are identified as such. These buildings are also included on the draft Local List published by the Council in March 2018. The following are within or immediately adjacent to the application site:

Property	Description
90 Haymerle Road (Space Studios and adjacent vacant building known as the Former Pramworks)	Building or Feature of Townscape Merit
Acorn Wharf Chimney	Building of Architectural or Historic Interest

273. The following are within the immediate vicinity of the application site:

Property	Description
Livesey Place cobbles	Building or Feature of Townscape Merit
553 Old Kent Road	Building of Architectural or Historic Interest
541-549 (odd) Old Kent Road	Building of Architectural or Historic Interest
1-21 Peckham Park Road (odd)	Building or Feature of Townscape Merit
610-363 Old Kent Road (even)	Building or Feature of Townscape Merit
49 Glengall Road	Building or Feature of Townscape Merit
55 and 57 Glengall Road	Building or Feature of Townscape Merit

274. In addition to 90 Haymerle Road and the Acorn Wharf chimney, there are two further undesignated heritage assets on the site that have not to date been identified in the draft OKR AAP or Local List. This is because the evidence base is continuing to develop, including work on local heritage. This work has revealed that there is a potential 19<sup>th</sup> Century timber mill and a 19<sup>th</sup> century stable building remaining on the site, both in Acorn Wharf. The stable building appears in the 1871 OS map, and the timber mill structure in the 1894 map.

Image: 1894 Ordnance Survey Plan



Extract from the 1894 60" Ordnance Survey plan, highlighting timber mill structure and stable building that remain on site today.

275. Officers have carefully assessed the significance of the remaining undesignated and draft locally listed structures on the site and balanced this against the site's regeneration potential and the wider benefits that can be achieved. Through this analysis it is concluded that it would be unacceptable for the retained chimney and stable building to be demolished. Both are attractive features of relatively high significance that would be easily retained within development proposals. As such there is no justification for their removal. A condition requiring their retention is therefore recommended. It is also recommended that the conditions requiring details of the landscape proposals should make specific reference to the chimney and stable and how they would be integrated into the public realm.
276. In addition to the chimney, the other draft locally listed building on the site is the warehouse structure immediately to the south of Space Studios. This is a vacant building that is in a very poor state of repair, and is known as the Former Pramworks. Officers undertook several discussions and site visits with the applicant about whether this building could be retained, but ultimately it was demonstrated that it would not be financially viable to refurbish it. Instead, the proposals for the new building in this location have taken their inspiration from the existing building, presenting similar proportions and materiality. Given the discussions and site visits

that have been undertaken in relation to this building, it is concluded on balance that although its loss would result in some less than substantial harm, this would be outweighed by the wider regeneration benefits of the proposals. Furthermore, as the Southwark Studios building itself would be retained, the majority of this complex identified in the draft OKR AAP as being of townscape merit would remain. As such, its loss would accord with the NPPF (2019) in relation to designated and undesignated heritage assets.

277. Finally, there is the timber mill structure. From the outside, it has been so substantially altered as to have lost all its heritage significance. It is only the internal roof structure within the building that retains significance. The interior of the building would however not be statutorily protected unless it was listed, and this is considered very unlikely. Furthermore, given the size of the structure and its position on the site, if it were to be retained it would present a substantial obstruction to the proposed Linear Park. As a result it is not considered necessary to retain this structure, as its heritage significance is very limited and doing so would restrict the wider regeneration benefits of the proposals. As such, its loss would accord with the NPPF (2019) in relation to designated and undesignated heritage assets.
278. The submitted ES considers the impact of the proposals on the built heritage that remains on the site. In relation to the existing buildings associated with the 19th and early 20th Century industrial development along Grand Surrey Canal, it states that they would all be demolished. It states that these assets are of limited interest, but acknowledges that without mitigation, their demolition would result in total loss of significance. The ES therefore proposes historic building recording at an appropriate level before the demolition, to be agreed through consultation with the council. As discussed above, this is considered appropriate for the mid 20th Century building on Haymerle Road and the 19th Century timber mill, and a condition to this effect is recommended. The loss of the chimney and stable buildings however, is not acceptable, as discussed above. These structures must be retained on site.
279. The heights of the buildings proposed would result in considerable change in the townscape of the area and would therefore impact on the settings of the heritage assets surrounding the site. This is also acknowledged in the ES, and is discussed in greater detail in response to the submitted Townscape, Visual and Heritage Impact Assessment (TVIA) below.
280. On the whole, the application site shares little or no historical relationship with the heritage assets in the surrounding area and contributes very little to their settings. On balance, the replacement of the largely poor quality townscape that currently occupies the site would enhance the settings of the surrounding heritage assets through the high quality detailed design and material palette proposed and the introduction of new routes and public spaces within the site.

#### Townscape and Visual Impact Assessment (TVIA)

281. The submitted Townscape and Visual Impact Assessment (TVIA) reports on the impact of the proposed development on 20 views. The views were selected in consultation with officers in order to ensure the most sensitive views were tested, and include protected views from the London View Management Framework and locally protected views.
282. Given that large neighbouring schemes at the Cantium Retail Park, Nye's Wharf, 49 Glengall Road and Ruby Triangle now have resolutions to grant planning consent, the consideration of the TVIA will focus on the cumulative assessments, rather than

those views that show the Malt Street proposals in isolation.

London View Management Framework (LVMF) Views

283. London Plan (2016) Policy 7.11, London View Management Framework, and Policy 7.12, Implementing the London View Management Framework, relate to the identified strategic views in London. They state that development should not harm these views, and where possible should make a positive contribution to the characteristics and composition of strategic views. Supplementary Planning Guidance on the LVMF was published in March 2012.

284. The LVMF views likely to be impacted upon by the proposed development are 2A.1 from Parliament Hill and 3A.1 from Kenwood. It is likely that the development would also be visible in view 6A.1 from Blackheath Point, but at such a substantial distance from St Paul's that it would not have any harmful impact. As such, an assessment of this view has not been submitted.

285.	<b>VP19 (LVMF 3A.1 Kenwood House)</b>	
	View location	The viewing gazebo at Kenwood House, set within an estate bordering Hampstead Heath.
	Heritage Significance	LVMF protected view. The foreground of the view is occupied by the open parkland, with a band of mature trees providing a sense of containment beyond. Central London, and particularly the tall buildings of the City, is visible beyond to the left of centre in the view. St Paul's Cathedral is visible to the right of the Shard. The vista towards St Paul's is protected.
	Other Significance	Public open space.
	Sensitivity to change	High
	Impact of proposals (cumulative)	The proposed development would be visible to the right of St Paul's Cathedral and Guy's Hospital, stepping down in height away from the Shard. The tallest tower of the Cantium proposal would break the horizon line, in a similar manner to Guys Hospital, but tower B4 of Malt Street would remain just below it. There would be no encroachment on the Viewing Corridor or Wider Setting Consultation Area defined by the LVMF, but the buildings would be seen in the background of the wider setting consultation area. As a result of the composition of tall buildings proposed, and the way in which they step down in height, it is considered that, in line with paragraph 121 of the LVMF Supplementary Planning Guidance, they would "contribute to a composition that enhances the setting of the Strategically Important Landmark".
	Historic England Comments	HE requested that this view should be assessed as it was not included in the original submission, but have not commented on the results of the analysis specifically.
	GLA Comments	The proposed view 3A.1 demonstrates that the building would be visible to the right of Guys Hospital and St Paul's Cathedral, and would not detract from the viewer's ability to recognise the Strategically Important Landmark, or harm the composition of the view as a whole.
	Conclusion	As there would be no impact on the perception of St Paul's Cathedral, there would be no harm to the view.

<b>VP20 (LVMF 2A.1 Parliament Hill)</b>	
View location	The summit of Parliament Hill
Heritage Significance	LVMF protected view. The view crosses a wide span of London. The foreground is occupied by the open space of Hampstead Heath. The tall buildings of central London appear in the distance, including the City of London cluster. The vista to St Paul's Cathedral in the centre of the view is protected.
Other Significance	Public open space.
Sensitivity to change	High
Impact of proposals (cumulative)	The proposed development would be visible in the background of the view, some distance to the right the Viewing Corridor and Wider Setting Consultation Area defined by the LVMF. It would to the right of the approved Cantium scheme and Guys Hospital and perceived as being largely of a lower height. The B4 tower would be perceived as a well proportioned, slender object.
Historic England Comments	HE requested that this view should be assessed as it was not included in the original submission, but have not commented on the results of the analysis specifically.
GLA Comments	With regard to view 2A.1, the building would appear to the right of the Shard and Guys Hospital and would not be seen directly behind St Paul's Cathedral or the Palace of Westminster.
Conclusion	The proposed scheme would have no impact on the silhouette of St. Paul's Cathedral or the ability to appreciate St. Paul's in this view. As the silhouette of the Cathedral would be preserved, and the wider setting consultation area would not be encroached upon, it is not considered that there would be any harm to this view. Furthermore, the Shard would remain the tallest feature in the view, by quite some degree of magnitude.

#### Borough Protected Views

286. Although of limited weight, the draft New Southwark Plan Policy P19, 'Borough Views', states that development must positively enhance the borough views which have been identified. The borough views potentially impacted on by the proposed development are P19:1 The London panorama of St Pauls Cathedral from One Tree Hill, and P19:2 The linear view of St Pauls Cathedral from Nunhead Cemetery. The draft policy states in both cases that development must "maintain the view of St. Paul's Cathedral from the viewpoint place", "not exceed the threshold height of the view's Landmark Viewing Corridor", and "not compromise the sensitive Wider Assessment Area that is located either side of the Landmark Viewing Corridor to ensure the viewer's ability to recognise and appreciate St. Paul's Cathedral and its setting". It also states that a canyon effect of the view of St. Paul's Cathedral must be avoided.

#### Local Views

287. In addition to the strategic views protected by planning policy, the submitted TVIA sets out the impact on a number of views within the immediate vicinity of the site. On the whole, in local views the proposed development would result in a high quality

and well-proportioned addition to the skyline. The impact on each local view is summarised below.

<b>VP1</b>	
View location	Leyton Square
Heritage Significance	Protected London Square (London Squares Preservation Act of 1931). In this case, it is the use of the square that is protected. Visually, it does not retain any heritage features.
Other Significance	Borough Open Land, Public open space
Sensitivity to change	Low to medium
Impact of proposals (cumulative)	The proposed 44 storey tower (Building B4) would become the focal point of this view, fulfilling its landmark role. The composition of the outline proposals would step down towards the tower, emphasising its importance. The approved scheme at Nye's Wharf would be visible toward the centre of the view, but would be read as part of the new layered townscape, and would fit well into the overall composition. Small parts of the approved proposals at Cantium Retail Park would also be visible in the background, again fitting well into the overall composition.
Historic England Comments	None
GLA Comments	None
Conclusion	The impact on this view would be beneficial as the new cumulative development would provide an attractive and high quality backdrop to the play space, beyond the existing tree canopy.

<b>VP2</b>	
View location	Neate Street / Cricket Club
Heritage Significance	
Other Significance	Linear, directional view, adjacent to major public open space of Burgess Park.
Sensitivity to change	Medium
Impact of proposals (cumulative)	The proposed 44 storey tower (B4) would become the focal point of this view, fulfilling its landmark role on the axis of the road that runs through the foreground. The three towers of the consented scheme at Cantium Retail Park would step up to the B4 tower to the left hand side of the view. The outline Malt Street proposals would sit in front of the lower levels of the tower. The mature trees in the foreground of the view would remain the dominant feature.
Historic England Comments	None
GLA Comments	None
Conclusion	The impact on this view would be beneficial as the new cumulative development would provide an attractive and high quality backdrop to the open space, without unduly detracting from the impressive mature trees.

<b>VP3</b>	
View location	Burgess Park (at the Lake Edge)
Heritage Significance	Looking into the Cobourg Road Conservation Area, which includes some listed buildings (albeit from some distance)

		away)
Other Significance		Landmark feature (the lake) within a major public open space
Sensitivity to change		High
Impact of proposals (cumulative)		The cumulative development would be visible in the background. It would form a new distinct layer of townscape and skyline; clearly separate from the park in the foreground and other lower scale buildings (including those listed buildings within the Conservation Area) in the middle distance. The approved schemes at Nyes Wharf and the Cantium Retail Park would be visible to the left hand side, then there would be a significant break and view of sky before the Building B4 tower and outline part of the Malt Street scheme would be visible. This would avoid visual coalescence, and ensure that the layers of the new backdrop are easily read. To the right hand side of the B4 tower, the heights would drop substantially to be perceived as lower than the historic school building.
Historic Comments	England	HE observed that, despite some visibility of distant towers along the Old Kent Road, certain views from the Park towards the Conservation Area remain relatively unspoilt. This is represented in VP03 of the TVIA Report (p8-9). The wireline assessment demonstrates that the proposed masterplan development would rise substantially above the existing tree and roofline resulting in a dominant intrusion on the skyline. This, in our opinion, would undermine the attractive and picturesque qualities of the conservation area in views from Burgess Park, and therefore cause harm to the character of the Conservation Area, and to the setting of the Grade II listed townhouses in this particular view.
GLA Comments		The GLA do not mention specific local views, but do identify harm to the setting of the Glengall Road, Cobourg Road, Caroline Gardens conservation areas and the listed buildings within them. However, GLA officers consider that the proposed buildings respond to the changing context of the area, and would bring about substantial improvements in the quality of the existing environment. Whilst they state that there would be some harm to the setting of heritage assets, they consider this harm to be less than substantial, and decisively outweighed by the public benefits of the scheme as outlined above. They therefore consider the proposals to accord with Policy 7.8 of the London Plan and Policy HC1 of the draft London Plan.
Conclusion		There would be major impact on this sensitive view, but it is not considered that this would be harmful. The proposed development would be visually distinct from the historic school and the lake, which would remain the focus of the foreground and mid ground. The tree canopy enclosing the park would remain clearly defined, and the distant view of the houses within the conservation area would not be disrupted.

Image: VP3 Burgess Park



288. Detailed Malt Street proposals in red. Outline in cyan. Cumulative schemes in orange.

<b>VP4</b>	
View location	Old Kent Road/Olmar Street junction
Heritage Significance	None
Other Significance	Important node on the Old Kent Road itself.
Sensitivity to change	Low
Impact of proposals (cumulative)	The approved scheme at the Cantium Retail park would dominate this view, and the benefits of this scheme for the townscape and streetscape of the Old Kent Road were discussed in detail in the relevant report (18/AP/3246). Of particular note is their role marking the entrance to the linear park.
Historic England Comments	None
GLA Comments	None
Conclusion	As this view is not sensitive to change, and the existing townscape is of poor quality, the proposed cumulative development would have a beneficial impact. The Malt Street proposals would be largely obscured by the approved scheme at the Cantium Retail Park.

<b>VP5</b>	
View location	Queen Victoria Public House, Southwark Park Road
Heritage Significance	Looking through the Thorburn Square Conservation Area. The Queen Victoria Public House is a positive historic feature of local character and townscape significance.
Other Significance	
Sensitivity to change	High

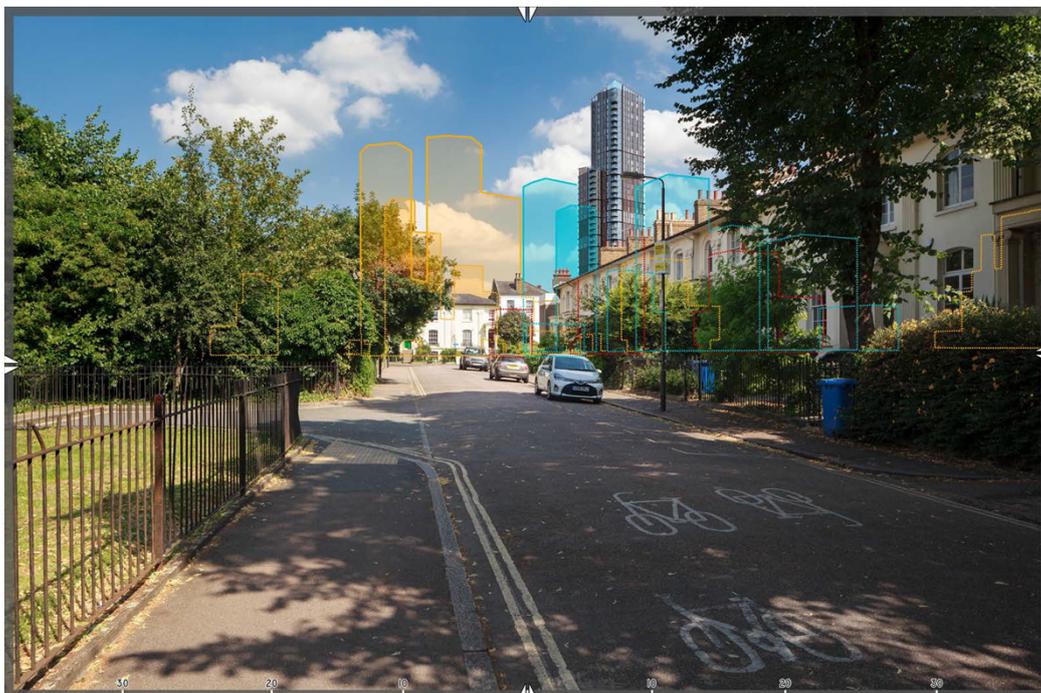
Impact of proposals (cumulative)	In the summer, the view if almost all of the cumulative proposed development, including that proposed at Malt Street would be screened by tree foliage. In the winter it would be more visible in the distance, but it would only form a small part of the view. It would not disrupt any historic roof lines or other coherent elements of the view.
Historic England Comments	None
GLA Comments	None
Conclusion	The impact of the proposed cumulative development would be relatively minor given its distance from the viewing position and the screening effect of the trees (particularly in summer). As such there would not be any harm to this view.

<b>VP6</b>	
View location	Southern Railway Stables (at Old Forge entrance)
Heritage Significance	The stables are identified as buildings of architectural or historic interest in the draft OKR AAP. As this view is from the stable, rather than <i>of</i> them, it is not of any particular heritage significance.
Other Significance	
Sensitivity to change	Low
Impact of proposals (cumulative)	The majority of the cumulative proposed development (Malt Street and Cantium Retail Park) would be seen to the left hand side of the view, over the rooftops of the late 20 <sup>th</sup> Century housing. It would be well clustered together and create a high quality landmark presence on the skyline indicating the location of the new linear park, and public and civic uses proposed.
Historic England Comments	None
GLA Comments	None
Conclusion	This view is not sensitive to change and it is not considered that the proposed cumulative development would result in any harm. The landmark presence of the scheme, and its impact on the legibility of the city could be beneficial.

<b>VP7</b>	
View location	Glengall Terrace
Heritage Significance	View is from within the Glengall Road Conservation Area. . Most of the houses in the view are Grade II listed.
Other Significance	Adjacent to public open space
Sensitivity to change	High
Impact of proposals (cumulative)	The cumulative proposed development would be very visible behind the listed houses and its perceived height would be markedly out of character with the existing, coherent historic townscape. The proposed 44 storey B4 tower would be perceived as the tallest element in the view. There would also potentially be some visual coalescence between the approved scheme at the Cantium Retail Park and the outline Malt Street Proposals. Detailed design of Reserved Matters could mitigate this to a degree.

Historic Comments	England	HE note that Glengall Terrace contains a c1843-1845 Grade II listed stuccoed terrace along the south side of the street and that it retains its historic roofline without significant obstruction (clearly demonstrated in VP7). They consider that the proposed masterplan, and particularly the tower subject to detailed planning permission, would break the unobstructed roofline at the corner of Glengall Road and Glengall Terrace, which would detract from the historic streetscape. They conclude that this impact would constitute harm to both the character of the Conservation Area and the setting of the Grade II listed houses.
GLA Comments		The GLA do not mention specific local views, but do identify harm to the setting of the Glengall Road, Cobourg Road, Caroline Gardens conservation areas and the listed buildings within them. However, GLA officers consider that the proposed buildings respond to the changing context of the area, and would bring about substantial improvements in the quality of the existing environment. Whilst they state that there would be some harm to the setting of heritage assets, they consider this harm to be less than substantial and decisively outweighed by the public benefits of the scheme as outlined above. They therefore consider the proposals to accord with Policy 7.8 of the London Plan and Policy HC1 of the draft London Plan.
Conclusion		The appearance of modern tall elements in this coherent historic townscape would have a harmful visual impact. However, officers consider that the harm caused would be less than substantial and would be outweighed by the wider regeneration benefits of the proposals.

Image: VP7 Glengall Terrace



289. Detailed Malt Street proposals accurately rendered. Outline in cyan. Cumulative schemes in orange.

<b>VP8</b>	
View location	Old Kent Road / Ledbury Estate
Heritage Significance	
Other Significance	Open view, with locally distinctive Ledbury towers providing a focal point.
Sensitivity to change	Low
Impact of proposals (cumulative)	The proposed cumulative development would be largely screened by tree foliage in the summer, with only the tops of the 44 storey B4 tower and the tallest tower of the Cantium Retail park proposals visible. In winter the trees would still screen the development to a significant degree, but it would be more visible.
HE Comments	None
GLA Comments	None
Conclusion	The view is not particularly sensitive to change, and the proposals would create a high quality layer within the townscape. The tallest tower of the Cantium Retail Park proposals would become the landmark focus of the view, identifying the location of the new linear park, a civic square and potential new destination space. These enhancements to the legibility and townscape of the area would be beneficial.

<b>VP9</b>	
View location	Former Licensed Victuallers Asylum (from Courtyard facing over the building)
Heritage Significance	Caroline Gardens Conservation Area, Grade II Listed almshouse complex and landscaped forecourt
Other Significance	
Sensitivity to change	High
Impact of proposals (cumulative)	The proposed cumulative development would be very visible in this view. The tallest tower to the approved Cantium would be perceived as the tallest element, and would sit behind the existing towers of the Ledbury Estate. The heights of the outline component of the Malt Street proposals would step down from this towards the corner of the listed courtyard. The 44 storey tower B4 would however rise up from these lower buildings. It would however be further from the viewing point than the Cantium tower and the Ledbury Estate, and would therefore be perceived as a secondary element within the background of the view. It would also have very slender proportions, and the materiality would complement the existing buildings well.
Historic Comments	England HE note that Caroline Gardens is an extensive Grade II listed almshouse complex dating from 1827-33 and is arranged in a grand orthogonal plan. The planned geometric arrangement of the buildings evokes a stately character and provides the Conservation Area with a relatively enclosed setting. Despite this, they also note that a number of tower blocks are visible from the forecourt

	<p>area, in particularly the Ledbury Estate buildings. HE consider that View 9 demonstrates the visual impact of the existing towers at the corner of the central and north range of the almshouse complex. They conclude that this would be significantly exacerbated by the proposed masterplan development and that this cumulative impact would further detract from the formal orthogonal plan and enclosed setting of Caroline Gardens, and therefore cause harm to the character of the Conservation Area and the setting of the Grade II listed almshouse buildings.</p>
<p>GLA Comments</p>	<p>The GLA do not mention specific local views, but do identify harm to the setting of the Glengall Road, Cobourg Road, Caroline Gardens conservation areas and the listed buildings within them. However, GLA officers consider that the proposed buildings respond to the changing context of the area, and would bring about substantial improvements in the quality of the existing environment. Whilst they state that there would be some harm to the setting of heritage assets, they consider this harm to be less than substantial, and decisively outweighed by the public benefits of the scheme as outlined above. They therefore consider the proposals to accord with Policy 7.8 of the London Plan and Policy HC1 of the draft London Plan.</p>
<p>Conclusion</p>	<p>The visibility of the proposed cumulative development over the roofline of the listed buildings would have a harmful impact on this view. Officers consider however, that this harm would be less than substantial and would be outweighed by the wider regeneration benefits of the proposals.</p>

Image: VP9 Former Licensed Victuallers Asylum



290. Detailed Malt Street proposals accurately rendered. Outline in cyan. Cumulative schemes in orange.

<b>VP10</b>	
View location	Opposite Former North Peckham Visitor Centre ('The Civic Centre')
Heritage Significance	
Other Significance	Important node on the Old Kent Road
Sensitivity to change	Low
Impact of proposals (cumulative)	The proposed buildings of the Cantium site would dominate the view. The beneficial impact these will have on the townscape and streetscape of Old Kent Road is discussed in detail in the relevant report (18/AP/3246). Of particular note is their role marking the entrance to the Linear Park. The Malt Street proposals would be visible behind this, along the linear park.
Historic England Comments	None
GLA Comments	None
Conclusion	The existing townscape in this location would be enhanced by the proposed cumulative development. As such, the impact is considered beneficial.

<b>VP11</b>	
View location	Rear of former Livesey Museum
Heritage Significance	This view is from the setting of a the Grade II listed former museum, although the museum itself is not visible. The neighbouring Christchurch Peckham is identified in the draft OKR AAP as a building of architectural or historic interest

	and some of the houses in the mid ground of the view are identified as buildings of townscape merit.
Other Significance	Public open space with play area
Sensitivity to change	Low to medium
Impact of proposals (cumulative)	The proposed cumulative development would be visible over the roofs of the houses identified as being of townscape merit. The majority would be clustered together, although the tallest Cantium tower would be slightly separate to the right. They would be of a high architectural quality and would mark the presence of the new linear park and proposed public and civic uses.
Historic England Comments	None
GLA Comments	None
Conclusion	This view is not considered to contribute to the setting of the listed building and is therefore of relatively low heritage significance. As a result, it is not considered that the proposals would result in any harm.

<b>VP12</b>	
View location	From Old Kent Road, looking towards the listed Fire Station and Thomas a' Becket Public House
Heritage Significance	The fire station is Grade II listed and the Thomas a' Becket is identified as a building of architectural or historic interest in the draft OKR AAP.
Other Significance	Important node on the Old Kent Road.
Sensitivity to change	Low to medium
Impact of proposals (cumulative)	The cumulative development proposals would be visible in the distance along the Old Kent Road. They would be visually distinct from the heritage assets that are visible in this view and would be of a perceived scale that would not detract attention from them. There would be very little visual coalescence between the new buildings, which would be read as discreet elements forming a coherent new layer of townscape. In the summer, a significant proportion of the proposed development would be screened by tree foliage.
Historic England Comments	None
GLA Comments	None
Conclusion	The proposed development would offer enhancements to the legibility of the area, with the towers marking the presence of the new linear park. As such, the impacts would be beneficial.

<b>VP13</b>	
View location	Surrey Canal Path
Heritage Significance	The historic chimney on Glengall Road would be visible in the middle distance. This is identified as a structure of architectural or historic importance in the draft OKR AAP.
Other Significance	Public open space
Sensitivity to change	Medium
Impact of proposals	The cumulative development proposals would have a

(cumulative)		substantial impact on this view, particularly the approved scheme for 49 Glengall Road, which would dominate the foreground. However, the significant chimney and facades of the existing building would be retained, resulting in a high quality sensitive proposal. The Malt Street and Cantium buildings would be visible behind this marking the location of the Linear Park.
Historic Comments	England	None
GLA Comments		None
Conclusion		The new development would be of a markedly different scale to the existing setting of this view and could detract attention from the open, green setting of the park. It is however important to note that the new buildings would frame the new linear park, which has an important role to play in the green infrastructure of the borough. Nevertheless, and on balance, it is considered that the impacts on this view would be harmful. Although this harmful impact is not specifically related to heritage, the NPPF tests are still considered a useful benchmark here. The harm would be less than substantial and outweighed by the wider regeneration benefits of the proposals.

#### VP13 Surrey Canal Path



291. Detailed Malt Street proposals accurately rendered. Outline in cyan. Cumulative schemes in orange.

<b>VP14</b>	
View location	South Bermondsey Station Platform
Heritage Significance	The Grade II listed gas holder is just visible to the left hand side of the view, but it is not the focus of the view and

	impacts on this view would not impact on its significance.
Other Significance	Panoramic view from elevated position.
Sensitivity to change	Low
Impact of proposals (cumulative)	The proposed cumulative development would have a substantial impact on this view, introducing an entirely new scale of development to the otherwise relatively low and flat context. From this vantage point almost all of the cumulative schemes would be visible to one degree or another.
Historic England Comments	None
GLA Comments	None
Conclusion	The existing townscape is not of a high quality, and does not offer any interest to this elevated view. The proposed cumulative development would offer a new dimension of significantly greater visual interest to the view and allow the viewer to appreciate the large scale regeneration of the area. The impact would therefore be beneficial.

<b>VP15 (Local View P19.1)</b>	
View location	Panoramic north facing view from One Tree Hill
Heritage Significance	Protected borough view identified in the draft New Southwark Plan. St. Paul's Cathedral is visible to the east of the Shard (on the left side of the image). Its profile is almost entirely uninterrupted by development in its foreground. The towers in the City of London appear further west (right).
Other Significance	Public Open Space
Sensitivity to change	High
Impact of proposals (cumulative)	The proposed cumulative development would be visible in the distance, towards the centre and right hand side of the view, some distance from St. Paul's Cathedral. It would sit in front of the cluster of towers in central London, but on the whole would be perceived as lower than the tallest parts of the city cluster. The City cluster could still be perceived. The proposed development would be read as part of an extensive panorama and would contribute to a layered townscape. It would appear as a visually interesting grouping of buildings, comprising elements of different heights and with complimentary elevational finishes.
Historic England Comments	None
GLA Comments	In relation to the view from One Tree Hill the proposals would be a new townscape feature in the foreground of the City backdrop, but would not detract from the viewer's ability to discern important landmarks such as St Paul's Cathedral or the Shard.
Conclusion	As St Paul's Cathedral would remain clearly visible, well to the left of the proposed cumulative development, there would be no harm to the heritage significance of this view.

<b>VP16 (Local View P19.2)</b>	
View location	View of St. Pauls Cathedral from Nunhead Cemetery
Heritage Significance	Protected borough view identified in the draft New Southwark Plan. The view is towards St. Paul's Cathedral, with Highgate West Hill beyond it in the distance. The view is framed by trees, specifically maintained to ensure the view is visible.
Other Significance	Public Open Space and cemetery
Sensitivity to change	High
Impact of proposals (cumulative)	The majority of the proposed Old Kent Road cumulative development, including the Malt Street proposals, would be located well to the side of St. Paul's Cathedral in this view. The Malt Street proposals would be obscured by tree branches and foliage to such a significant degree that it would not be visible.
Historic England Comments	The study indicates that the proposed development would be well screened by trees, and it therefore appears unlikely that there would be a significant impact on the setting of the Cemetery and its visual relationship with St Paul's Cathedral.
GLA Comments	In relation to the Nunhead Cemetery view toward St Paul's, the applicant's townscape assessment demonstrates that the proposal would not be visible in this view.
Conclusion	The proposed development would not be visible in this protected view and therefore would not cause any harm to its significance.

<b>VP17</b>	
View location	Ossory Road / Old Kent Road junction
Heritage Significance	
Other Significance	Important node on the Old Kent Road
Sensitivity to change	Low
Impact of proposals (cumulative)	The proposals would be perceived as part of an overall composition of new buildings running along the length of the linear park. The composition would step up in height towards the B4 tower and then down again. There would be very little visual coalescence between buildings, ensuring good views of sky would remain.
Historic England Comments	None
GLA Comments	None
Conclusion	The existing townscape in this view is considered to be of poor quality. The introduction of a new high quality layer of townscape would create a more visually interesting skyline and enhance the legibility of the area by marking the alignment of the new linear park. As such, the impacts are considered to be beneficial.

<b>VP18</b>	
View location	Southwark Park
Heritage Significance	
Other Significance	Major public open space

Sensitivity to change	Medium to high
Impact of proposals (cumulative)	The tops of a number of proposed towers from the Old Kent Road Opportunity Area would be visible above the treeline that currently encloses the park. They would be read as distinct from the park, and as a new layer of development.
Historic England Comments	None
GLA Comments	None
Conclusion	Given the extensive tree coverage, the cumulative proposed development would be well screened, and the perception of the park as an open, green public space would not be compromised. As such it is not considered that there would be any harm to this view.

#### Conclusion on the Setting of Listed Buildings, Conservation Areas and Townscape

292. The following table summarises the designated heritage assets that could be impacted by the proposal, and what harm, if any has been identified.

<b>Listed Buildings and Conservation Areas</b>	<b>Assessment of Impact on heritage significance</b>
LVMF Views	No harm identified
Local Views	No harm identified
Glengall Road Conservation Area	Some less than substantial harm identified to setting, outweighed by the wider regeneration benefits of the proposals.
Trafalgar Avenue Conservation Area	Some less than substantial harm identified to setting, outweighed by the wider regeneration benefits of the proposals.
Cobourg Road Conservation Area	Some less than substantial harm identified to setting, outweighed by the wider regeneration benefits of the proposals.
Thorburn Conservation Area	No harm identified
Peckham Hill Street Conservation Area	No harm identified
Caroline Gardens Conservation Area	Some less than substantial harm identified to setting, outweighed by the wider regeneration benefits of the proposals.
Sceaux Gardens Conservation Area	No harm identified
Listed Buildings	Some less than substantial harm identified to setting, outweighed by the wider regeneration benefits of the proposals.
Draft Locally listed buildings/ undesignated assets identified in the draft OKR AAP	Potential total loss of significance if the chimney and stable building are lost. Condition recommended to avoid this. Historic building recording required for timber mill and 90 Haymerle Road. Their loss would result in some less than substantial harm, which would be outweighed by the wider regeneration

	benefits of the proposals.
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293. In conclusion, the proposed development would have a significant impact on many of the views assessed, becoming a highly visible feature in the surrounding townscape. However, in the majority of cases, the impact is not considered to be harmful. Indeed in many views it is considered beneficial. The quality of design would be high, with a good composition of buildings, strong vertical emphasis and characterful tops creating new interest on the skyline.
294. There are three views where either Southwark Officers or Historic England (or both) consider that there would be some harm to townscape and heritage significance. These are views from Glengall Terrace, the former Licensed Victuallers Asylum (Caroline Gardens Conservation Area) and the Surrey Canal Path. Neither Southwark Officers nor Historic England considers that this harm would be 'substantial', as defined by the NPPF. Southwark officers do not consider that the degree of harm would warrant refusal of this planning application, as it would be far outweighed by the regeneration benefits of the proposals. Members need to assess the degree of harm and be satisfied that it would be outweighed by the other substantial regeneration benefits of this proposal.
295. In assessing the degree of harm that would be caused to heritage assets, Historic England conclude that "Whilst we do not consider the level of harm to any individual designated heritage asset to be 'substantial' in NPPF terms, the cumulative impact of the development on the wide range of designations in the vicinity is of much concern to Historic England." As set out in the report above, Officers agree that there would be adverse impacts on some sensitive views from heritage assets, including Conservation Areas and their settings, and the settings of Listed Buildings. As such, it is agreed that there would be an adverse impact on a range of heritage assets, so cumulative harm in this sense should also be assessed. In doing so, it is important to note that the views assessed in the TVIA were identified for the likelihood of the proposed development being visible, rather than necessarily being the most important or sensitive views impacting upon the relevant Conservation Areas or settings of listed buildings. There would be other points in these Conservation Areas and settings of the listed buildings from which the proposed development would not be visible at all.
296. It is also worth noting that, whilst it important to preserve the settings of designated and undesignated heritage assets, the settings themselves are not designated. The importance of the settings, and therefore the degree of protection they should be offered, depends on the contribution they make to the significance of the heritage assets themselves. On balance, it is considered that the significance of the heritage assets under consideration is not substantially harmed by the ability to see beyond them to clearly distinct, large-scale modern development. In many of the heritage assets under consideration, their context is already varied and densely developed. Indeed, as identified above, the improved townscape offered by the development under consideration would be beneficial to the settings of some heritage assets.

297. As such, whilst it is concluded that there would be some adverse, and therefore harmful impacts to the settings of some of the heritage assets surrounding the proposed development, even when considered cumulatively (in the sense set out above), this harm would be less than substantial and far outweighed the wider regeneration benefits of the proposals. As such, it is considered to accord with the NPPF (2019).
298. Historic England also raised concerns about the consideration of this application in the absence of an adopted strategy for the area, which they consider to conflict with their tall building guidance and Paragraph 185 of the NPPF. Throughout the assessment of the tall buildings proposed set out in this report, the very limited weight of the draft Old Kent Road Area Action Plan has been acknowledged. It is nonetheless considered important in guiding a vision for the Opportunity Area, and therefore of relevance to determining applications here. It is also worth noting that, whilst the OKR AAP is still in draft, the Old Kent Road Opportunity Area was formally identified in the Further Alterations to the London Plan in 2015, which have been incorporated into the current London Plan (2016). In addition, the adopted Southwark Core Strategy (2011) identifies Old Kent Road as an action area setting out that the area will be subject to substantial regeneration.
299. Whilst limited weight has been given to emerging policy, full weight has been given to adopted policies, including the NPPF (2019), London Plan (2016) and Southwark Plan (2007) and Core Strategy (2012). As can be seen from the assessment contained within this report, the proposals are considered to be in compliance with these adopted policies, although in some cases relating to impacts on heritage assets, balanced judgements are needed.
300. Historic England also go on to say that; “Regarding the proposed tower subject to detailed planning permission, the supporting visual information indicates that it would appear relatively isolated in a number of key views, and would therefore not appear to form a coherent part of the proposed masterplan development. It is important to note that in all three views in which we have identified harm, the impact of the proposed masterplan development represents a significant departure from the more modest scale of the Old Kent Road Local Development Study massing (outlined in green). This apparent lack of a coherent masterplan, and departure from the emerging strategy, is of much concern to us.”
301. The consultation response from Historic England is dated 28<sup>th</sup> September 2017. As such, it pre dates the publication of the preferred draft OKR AAP, which replaces the Old Kent Road Local Development Study. As set out elsewhere in this document, and acknowledging its limited weight, the proposals under consideration do largely accord with the draft OKR AAP. The cumulative views analysis, which has also been updated since HE wrote this consultation response, also shows that the proposed tower would sit comfortably within a cluster of tall buildings, indicating the centre of the Old Kent Road Opportunity Area and the presence of the linear park. In their response to re-consultation on this scheme, Historic England referred back to their comments in the letter dated 28<sup>th</sup> September 2017 and noted that “despite our previous objection, amendments are now proposed to further increase the scale of this development.” Any increases to the scale of development resulted from careful discussion with officers in order to balance the provision of accommodation across the scheme, including a substantial increase in affordable housing and employment floor space, whilst also addressing specific design concerns.

### Conclusion on views

302. In conclusion, the proposed development would have a significant impact on many of the views assessed, becoming highly visible in the surrounding townscape.
303. The assets to which it has been identified that there would be some harm to Glengall Road Conservation Area, Trafalgar Avenue Conservation Area, Cobourg Road Conservation Area, Caroline Gardens Conservation Area and the Surrey Canal Path (Burgess Park) some listed buildings and some draft locally listed buildings. However, these are considered by officers to be less than substantial and outweighed by the wider regeneration benefits of the proposal.

### **Trees**

304. Saved Policy 3.13 of the Southwark Plan requires high quality and appropriately designed streetscape and landscape proposals.
305. The proposal requires the removal of 22 trees of which 8 are individual trees and 1 tree group which contains 14 trees. The individual trees are located to the south of the site with the tree group located along the eastern boundary. No further trees are located close enough to the site boundary to potentially extend into the site. The quality of these trees has been assessed in the submitted Arboricultural Report and have been categorised as category C trees which are “trees of low quality”. The redevelopment proposals include plans for new linear tree planting, including native and ornamental specimens which are considered to more than compensate for the existing small number of scattered, low quality trees on the site. Therefore, there are no concerns with the removal of the existing trees.
306. The existing trees can be adequately replaced within the proposed landscape plan so there would be a net gain in tree canopy cover when compared to the existing; this is a positive biodiversity benefit of the proposals. In total, approximately 140 new trees would be planted.
307. To further mitigate the loss of existing trees, a large number of the replacements would be planted at semi mature sizes, details of which can be reserved by condition. This aspect of the scheme is therefore found to be acceptable.

### **Housing mix**

308. Strategic Policy 7 of the Core Strategy 'Family homes' requires developments of 10 or more units to provide at least 60% 2+ bedroom units and 20% 3+ bedroom units. No more than 5% studio units can be provided and these can only be for private housing. At least 10% of the units should be suitable for wheelchair users. This mix is replicated in the draft OKR AAP (Policy 5). The proposed housing mix for the detailed and outline elements is found below.

Table: Detailed housing mix

	<b>Phase 1 (Full)</b>	
<b>Unit size</b>	<b>No. of units</b>	<b>% units</b>
<b>Studio</b>	9	2.1%
<b>1 bed</b>	171	40.7%
<b>2 bed</b>	175	41.7%

<b>3 bed</b>	65	15.5%
<b>TOTAL</b>	420	100%

Table: Detailed affordable housing mix

<b>Unit size</b>	<b>No. of units</b>	<b>% units</b>
<b>1 bed</b>	38	29%
<b>2 bed</b>	51	39%
<b>3 bed</b>	42	32%
<b>Total</b>	131	100%

309. At 2.1%, the number of studio flats is well within the 5% limit and so is acceptable. 57.2% of units would have two or more bedrooms; this falls short of the 60% target. Also, just 15.5% of the units would have three or more bedrooms, which is below the 20% requirement.
310. For the affordable housing however, the housing mix fully meets the policy requirements. 71% of the units would have two or more bedrooms and 32% would have three bedrooms. So whilst there is an overall shortfall in units with two or more bedrooms and three bedroom units in the Detailed Component, the percentage of these units in the affordable housing mix would be fully compliant. The housing mix in this phase is therefore found to be acceptable. It should also be noted that the GLA support the housing mix, recognising the high proportion of family sized units in the Detailed Component that would be secured in the affordable provision.

Table: Outline indicative housing mix

<b>Unit type</b>	<b>% of private homes</b>	<b>% of intermediate homes</b>	<b>% of social rented homes</b>
Studio	0-10	0-10	0
1 bed	30-40	15-25	35-45
2 bed	40-50	55-65	30-40
3 bed	0-15	10-20	20-30
4 bed	0	0	0-10

311. The applicant has provided an indicative housing mix table for the outline element which is found above in paragraph 310. The table reflects that higher proportions of family sized units would be provided in the intermediate and social rented tenures, which is welcomed. 4 bed social rented units would also be provided. The applicant has also committed to ensuring that the proportion of 2 bed plus units would be at a minimum of 60%.
312. The reserved matters applications submitted for the outline phases would determine the exact housing mix proposed for those phases and a condition has been imposed on the draft decision notice to require the housing mix to be in compliance with Strategic Policy 7 Family Homes of the Core Strategy 2011 and draft OKR AAP policy 5.

#### Wheelchair housing

313. Saved policy 4.3 of the Southwark Plan requires at least 10% of all major new residential developments to be suitable for wheelchair users and London Plan Policy 3.8 requires 90% of new housing to meet Building regulations M4(2) "accessible and

adaptable” and 10% to meet Building Regulations M4 (3) “wheelchair user dwellings”. This is reiterated in emerging policy in the draft OKR AAP and the NSP.

- 314. The applicant has provided written confirmation that they would be fully committed to delivering 10% wheelchair user dwellings M4(3) across a variety of tenures and unit sizes within the scheme. They have also committed to the remaining 90% to meet Building Regulations requirement M4 (2) accessible and adaptable dwellings. This would meet the policy requirements.
- 315. However, in the Detailed Component only 8 wheelchair units (2%) are currently shown to be provided on the submitted plans. These units are all 2 bed 4 person units in Building B10, in the social rented tenure.
- 316. To make up the shortfall in the provision, the applicant has agreed to accept a clause in the legal agreement which would require the provision of 10% wheelchair units and 90% accessible and adaptable, with plans submitted prior to the commencement of each phase of the development. This is considered an acceptable approach. The legal agreement would also need to make clear that the wheelchair units should be provided in a mix of unit sizes and across the private, intermediate and social rented tenures.
- 317. The social rented units would be required to be fully fitted for first occupation, with private and intermediate units being adaptable. Subject to the inclusion of the wheelchair clause in the legal agreement, the wheelchair housing mix would be in accordance the relevant policy.

**Quality of accommodation**

- 318. Saved Policy 4.2 of the Southwark Plan states that development should achieve good quality living conditions and include high standards of accessibility, privacy and outlook, natural light, ventilation, space, safety and security and protection from pollution. This policy is further reinforced by the Residential design Standards SPD 2011 (including 2015 Technical Update).

Unit size

- 319. Saved Policy 4.2 of the Southwark Plan advises that planning permission will be granted provided the proposal achieves good quality living conditions. The adopted standards in relation to internal layout are set out in the adopted Residential Design Standards SPD 2011 (including 2015 Technical Update).
- 320. The following table sets out the minimum flat size requirements as set out in the Residential Design Standards 2011, and also the flat sizes that would be achieved:

Table: Detailed component unit sizes

<b>Unit Type</b>	<b>SPD (sqm)</b>	<b>Size Range (sqm)</b>
Studio	36	39-42
1 Bed 2 person (flat)	50	50-59
2 bed 4 person (flat)	70	70-87
3 Bed 4 person (flat)	74	93

3 bed 5 person (flat)	86	87-237*
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\*Just one flat is included at 237sqm with the others ranging from 87-103sqm

321. The flat sizes meet the standards as set out in the SPD. In the case of the 3 bed 4 person flats, the flat sizes would be 19sqm above the minimum requirement which is a positive aspect of the scheme.
322. Building B10 contains the social rented units. The detailed floor plans for the family sized social rented units (i.e. 3 bed units) do not currently show separate kitchens and instead show open plan kitchen and living areas. Recognising that many registered providers require separate kitchens, the applicant has provided an indicative plan showing how the proposed layout could accommodate a separate kitchen, which requires a partition to be formed, which would leave the kitchen with direct access to daylight. The indicative layout submitted is found to be acceptable and it is recommended that a condition be imposed on the recommendation to require amended layouts for the social rented family sized units to be submitted clearly showing separate kitchens.
323. Overall, it is therefore considered that the flat sizes and layouts are acceptable, and would provide for a very good standard of internal amenity.

#### Dual aspect

324. The percentage of dual aspect units in the Detailed Component would be very good at 69.3%. This has been achieved as Building B4 (the tallest building at 44 storeys) has six flats out of eight on a typical floor that would be dual aspect. 30.7% of the units would be single aspect and there would be no single aspect north facing units. This is considered a very positive aspect of the proposals.
325. In addition, 62.7% of the social rented units in Detailed Component would be dual aspect, with 37.3% single aspect and as such a clear majority of the social rented units would be dual aspect.
326. In relation to the Outline Component, an indicative analysis of the percentage of dual aspect units that could be achieved shows that 62.4% dual aspect would be achieved, with 35.1% single aspect and 2.6% single aspect north facing. Overall, a clear majority of dual aspect units would be delivered which would provide a very good standard of internal amenity for the residents.
327. Taking the Detailed Component and the indicative Outline Component together, the development overall would achieve 63.3% dual aspect, 35.1% single aspect and 1.7% north single aspect. Taking into account the high density nature of the scheme, the level of overall dual aspect accommodation is considered very good.

#### Internal daylight

328. A daylight and sunlight report based on the Building Research Establishment (BRE) Guidance has been submitted which considers light to the proposed dwellings using the Average Daylight Factor (ADF). ADF determines the natural internal light or daylit appearance of a room and the BRE guidance recommends an ADF of 1% for bedrooms, 1.5% for living rooms and 2% for kitchens. This also adopts an ADF of 2% for shared open plan living room/kitchens/dining.
329. As set out above, the application includes a Detailed Component which consists of

four buildings and an Outline Component which consists of seven buildings. Together they would provide up to 1,300 units. The submitted report has tested all habitable rooms in the Detailed Component Buildings (B4, B9, B10 and B12). For Building B4 which would rise to 44 storeys, all habitable rooms up to floor 23 have been tested. Where windows are set back beneath balconies serving the floor above, the impact of the obstructing balcony has been taken into account in the model.

330. For the Outline Component, façade mapping has been undertaken which is considered appropriate as no detailed floorplans for those buildings exist.

Table: Detailed Component - Summary of ADF results

<b>Detailed Proposed buildings</b>	<b>Component</b>	<b>No. of habitable rooms tested</b>	<b>No. that achieve the recommended ADF target values</b>
Building B4		435	426 (98%)
Building B9		120	110 (92%)
Building B10		276	248 (90%)
Building B12		30	30 (100%)
Totals		861	814 (95%)

331. As indicated in the table above, of the 861 rooms tested in the Detailed Component, 814 (95%) would achieve the recommended ADF targets or higher. This is considered to represent a very good level of adherence to the BRE guidelines.

332. In terms of the Outline Component, illustrative façade maps indicate the potential levels of VSC received on the facades of the Outline buildings. The BRE guide makes suggestions for daylight within analysis at the site layout stage of the design process, when room layouts and window locations are not yet determined. It suggests an approach which calculates the VSC at a series of test points 1.6m above the ground (or lowest storey level) on each main window wall no more than 5m apart. This analysis is therefore applicable to the Outline Component of the proposed scheme. The maximum VSC value that can be achieved on a completely unobstructed vertical wall is nearly 40%. The BRE guidelines advise that a VSC of 27% or more indicates the potential for good daylighting. The table below summarises the test point analysis.

Table: Summary of VSC test points within Outline Component

	<b>No. of points tested</b>	<b>Percentage</b>
Proposed VSC $\geq$ 27%	34327	64%
Proposed VSC < 27% & VSC $\geq$ 15%	13725	26%
Proposed VSC < 15% & VSC $\geq$ 5%	4622	9%
Proposed VSC < 5%	805	1%
Total	53479	100%

333. As the table above confirms, 64% of the test points would achieve VSC levels greater than the recommended 27% BRE target guideline figure which is considered to be good. A further 26% would achieve VSC levels between < 27% & VSC  $\geq$  15% which is a level of light common to urban settings such as the site. There are only a small percentage of windows where test points have < 15% VSC. These tend to be

located on the lower levels or on facades that are in close proximity with other blocks within the immediate area (such as the proposed Nye's Wharf development), which is inevitable for an urban setting.

334. When considering the results for both the Detailed and Outline Components, the level of internal daylighting to the residential accommodation is considered acceptable.

#### Overlooking within the scheme

335. In order to prevent harmful overlooking, the Residential Design Standards SPD 2011 requires developments to achieve a distance of 12m at the front of the building and any elevation that fronts a highway and a minimum of 21m at the rear.
336. Overall, there would be several instances where the overlooking distances would fall short of the required 21m as follows:
- Between Block B1 and Block B2 which would be between 16.2m and 18.4m;
  - Between Block B2 and B3 which would be 19.3m;
  - Between Block B3 and Block B4 which would be 20.2m at the closest point;
  - Between Block B4 and Block B5 which would be 18.3m at the closest point;
  - Between B4 and B12 which would be 14.7m;
  - Between Block B5 and Block B6 which would be 17.4m at the closest point;
  - The distance between Block B5 and B7 which would be 18m;
  - Between B9 and B10 which would be 17.7m;
  - Between B10 and B11 which would be 12.9m at the closest point; and
  - Between Block B3 and B10 would be 20m at the closest point.
337. Whilst the distances do fall short it is felt that the overlooking would not be so harmful to justify refusal of the scheme, especially as in many cases the distances fall just marginally short of the required 21m. Accordingly, this aspect of the scheme is considered acceptable. It may also be the case that for the Outline Component, main habitable rooms of differing units can be designed to not directly face each other. This can be explored as part of the reserved matters applications.

#### Amenity space

338. All new residential development must provide an adequate amount of useable outdoor amenity space. The Residential Design Standards SPD sets out the required amenity space standards which can take the form of private gardens and balconies, shared terraces and roof gardens. Policy 3.6 of the London Plan requires new developments to make provision for play areas based on the expected child population of the development. Children's play areas should be provided at a rate of 10 sqm per child bed space (covering a range of age groups).
339. In terms of the overall amount of amenity space required, the following would need to be provided:
- Private amenity space: For units containing 3 or more bedrooms, 10sqm of private amenity space as required by the SPD; and for units containing 2 bedrooms or less, ideally 10sqm of private amenity space, with the balance added to the communal gardens;
  - Communal amenity space: 50sqm communal amenity space per block as required by the SPD; and
  - Children's play space: 10sqm of children's play space for every child space in

the development as required by the London Plan.

- Public open space: 5sqm of public open space per dwelling as required by the draft OKR AAP. If it is not feasible to deliver the open space on site, a financial contribution will be required.

#### Private amenity space

340. All flats within the Detailed Component Buildings B9, B10 and B12 have been provided with private amenity space in the form of balconies. Building B4 (the tallest tower which contains private flats only) has 144 flats (out of a total of 277) that do not provide any form of private amenity space. In addition, there are 54 out of 63 flats that do not provide the required 10sqm of private amenity space (providing between 5.7sqm and 9.7sqm) and there are 6 3-bed flats that do not provide any form of private amenity space. Whilst this does not meet the policy expectation it is considered that there are sound design lead reasons for supporting this approach in this instance.

Image: Building B4 floor plan – 31<sup>st</sup> floor



- 341.
- These units in Building B4 have included larger internal living room spaces that creates a more spacious, better laid out flat;
  - It allows for higher levels of daylight to be received as there are no balconies to shade windows below and it allows the flats to take full advantage of dual aspect views; and
  - The design results in the tallest building (Building B4) having a more elegant profile.

Table: Detailed Component - private amenity space shortfall

Building	Balcony shortfall (sqm)	Balcony shortfall, taking account of extra internal living area (sqm)	Communal terrace proposed (sqm)	Private and communal amenity shortfall (sqm)
Building B4	1,753	1,014	492	522 shortfall
Building B9	168	168	485	317 surplus
Building B10	108	108	n/a	108 shortfall
Building B12	18	18	n/a	18 shortfall
<b>Total</b>	<b>2,017</b>	1,308	977	331* shortfall

342. Accordingly, as demonstrated in the table above, there would be a 331sqm shortfall in private amenity space for which a section 106 payment would be collected. Charged at £205 per sqm as per the council's Section 106 SPD, this would amount to £67,855. This could go towards delivering the council's Frensham Street Park. As the payment has been agreed by the applicant, it would make this aspect of the scheme acceptable.

Communal amenity space

343. In addition, 50sqm of communal amenity space is required for the Detailed Component phase as per the Residential Design Standards SPD. In the Detailed Component part of the scheme, some communal amenity space has been provided on part of a roof on Building B4 and also on the roof of Building B9, however there is no communal amenity space provision for Building B10 (which contains photovoltaic panels on its roof) or Building B12. Accordingly, the applicant has submitted to make a s.106 payment for this, recognising that the full provision cannot be secured on site, which would require a contribution of £10,250 (50sqm x £205 per sqm as per the council's Section 106 SPD). Combined with the private amenity shortfall, this would total £78,105. This would be secured through the s106.

Children's play space

344. In line with the Mayor's Providing for Children and Young People's Play and Informal Recreation SPG the development would be required to provide 3890 sqm of children's play space, based on a calculation that the development would accommodate 389 children, with a requirement for 10sqm of play space per each child. The child yield has been calculated for the Detailed and Outline Components of the scheme as follows.

Table: Child yield

	Number of children		
	Detailed	Outline	Total
Under 5	61	114	175
5 to 11	47	83	130
12+	29	55	84
<b>Total</b>	<b>137</b>	<b>252</b>	<b>389</b>

345. In total, 5,400sqm of children's play space would be provided in the development, as detailed in the table below. The level of provision exceeds the required provision of 3,890sqm by 1,510sqm and is accordingly a positive aspect of the scheme.

Table: Children's playspace

Age group	Area required (sqm)	Area provided (sqm)	Playspace over or under provision	Location
Dedicated under 5's	1750	460	-1,290	In between Building B1 and B2 & in between Building B5 and B6. Under provision is noted but a substantial playable landscape would be provided
Dedicated 5-11's	1300	470	-830	Next to Central Square
Dedicated 12+	840	320	-520	Next to Central Square & adjacent to Frensham St Park
Playable landscape			4150	Central Square and Linear Park
<b>TOTAL</b>	<b>3890</b>	<b>5400</b>	<b>1510</b>	

346. Designated equipped play space for all ages would be provided and play features would be fully integrated into the landscape design to provide an attractive and versatile public realm. In addition, informal play opportunities would be incorporated throughout the public realm. Further design details of the proposed play space within the scheme will be secured by condition.

### Image: Children's play space



### Public open space

347. Policy AAP10 of the emerging OKR AAP requires the provision of 5sqm of public open space per dwelling. In this case, this would amount to 6,500sqm based on the 1300 units proposed. The proposed development would deliver 3,680sqm of public open space in the proposed Linear Park and 3,400sqm in the Central Square. Combined, a total of 7080sqm would be provided which exceeds the 6,500sqm required by 580sqm. The delivery of such a substantial part of the site as open space is a significant benefit of the proposals.

### Secured by design

348. The application has been reviewed by the Metropolitan Police Secure by Design Advisor who is satisfied that, should this application proceed, it would be able to achieve the security requirements of the Secured by Design principles. Planning conditions requiring the proposed development to adhere to the principles and physical security requirements of Secured By Design are included with the recommendation.

### Units per core

349. Standard 12 of the Mayor's Housing Design SPG requires that each core should be accessible to generally no more than eight units on each floor. As stated in the Exemplary design standards table, all of the cores in the detailed component of the scheme would have no more than 8 flats per core. This aspect of the scheme is therefore acceptable.

### Overshadowing within the scheme

350. An overshadowing analysis has been carried out of all public and communal and outdoor areas within the site. The BRE guidelines state that for an amenity area to appear adequately sunlit throughout the year, at least 50% of the area should

receive at least two hours of sunlight on 21<sup>st</sup> March.

351. The overshadowing analysis shows that the proposed Linear Park, Central Square and play area between Building B1 and Building B2 would maintain levels in excess of 70%. The one area which would not achieve this guideline would be the playspace between Building B5 and Building B6 which would achieve 2 hours of sun to just 36% of its area, falling short of the required 50%. However, given the exceedance of sunlight received in the other amenity areas within the site, this is not considered to be harmful. Further, the sun exposure increases greatly throughout the summer, when users are more likely to make use of the space. Overall, it is considered that the scheme delivers a very good level of sunlight amenity for the amenity spaces.
352. The draft OKR AAP has purposefully identified sites for taller buildings to the north of the Linear Park such that they do not cast significant shadows over the new open space. This includes the proposal at Malt Street as well as the consented Cantium scheme which adjoins the site. The emerging proposal for a new park space at the council's Frensham Street Depot would also benefit from the same principle given the taller buildings proposed would be located to its north.

#### Conclusion on quality of accommodation

353. To conclude, officers are on balance satisfied with the quality of residential accommodation proposed. There are some shortcomings which include:
- 144 flats in the Detailed Component which do not have any form of private amenity space for the detailed component;
  - 53 three bed flats in the Detailed Component that do not provide the required 10sqm of amenity space, including 6 3 bed flats that do not provide any private amenity space; and
  - Typical 3 bed flats in the Detailed Component that do not provide the required bulk storage, providing 2sqm rather than 2.5sqm.
354. However, this is balanced against the percentage of dual aspect units which would be very good at 63.3% and only a small percentage would be single aspect north facing.
355. A substantial new Linear Park, Central Square and children's play areas would be provided at ground floor level to compensate for the lack of private amenity space to 144 flats. The provision of these spaces at ground floor level is a very positive aspect of the proposals.

The accommodation would achieve very good internal daylight levels including good privacy and outlook and a very good provision of outdoor amenity space and children's play space, as well as the other major regeneration benefits of the scheme.

#### **Density**

356. Policy 3.4 Optimising Housing Potential of the London Plan states that development should optimise housing output for different types of location within the relevant density range shown in Table 3.2 of the Plan. It also requires local context, the design principles and public transport capacity to be taken into account. Strategic Policy 5 – Providing new homes of the Core Strategy sets out the density ranges that residential and mixed use developments would be expected to meet. As the site

is located within the Urban Density Zone, a density range of 200 to 700 habitable rooms per hectare would be sought. In order for a higher density to be acceptable, the development would need to meet the criteria for exceptional design as set out in section 2.2 of the Residential Design Standards SPD.

357. The development as a whole would have an estimated density of 1,885 habitable rooms per hectare (hrh), calculated in accordance with the Residential Design Standards SPD 2011. This has been worked out on the basis of the total non residential floorspace of 7,000sqm, an assumed total of 3,229 residential habitable rooms (which includes the habitable rooms for the Detailed Component and as assumed habitable room figure for the outline) and a site area of 1.9 ha (which excludes the roads and Friary and Unwin strip included on the red line site plan).
358. Since the maximum upper limit of 700 hrh would be significantly exceeded, the development would need to demonstrate that it would provide exemplary accommodation to the highest design standards. If it can be demonstrated that an excellent standard of accommodation would be provided, and the response to context and impact on local services and amenity to existing occupiers is acceptable, then it's considered that the high density in this Opportunity Area location would not raise any issues to warrant withholding permission. This is considered in the following table and paragraphs.

Table: Exemplary residential design standards

Exemplary residential design criteria from Southwark Residential Design Standards SPD	Commentary
Provide for bulk storage	All one and two units for the Detailed Component have bulk storage which meets the minimum standards as prescribed in the SPD, however the typical three bed units include 2sqm which falls short of the required 2.5sqm.
Exceed minimum privacy distances	<p>The nearest existing residential properties are within Ednam House to the south of the site which are well over 30m away and Northfield House to the south-east of the site, which is over 50m away, thereby fully achieving the minimum 12m required.</p> <p>There are some instances where the overlooking distances within the scheme (i.e. between proposed buildings within the site) where the distances would fall short of the required 21m. In this case, the distances are not considered to be harmful and would allow for a reasonable level of privacy to be maintained.</p>

<p>Good sunlight and daylight standards</p>	<p>The submitted daylight report demonstrates that the internal daylight provision within the detailed component would be excellent. 95% of all habitable rooms would meet or exceed the recommendation for Average Daylight Factor.</p> <p>For the Outline Component, it has been estimated that 64% of the habitable rooms would meet or exceed the recommendation for Average Daylight Factor, and there could be opportunities for the daylight to be improved upon submission of the reserved matters applications which would determine the exact positioning and size of the habitable room windows.</p>
<p>Exceed minimum ceiling heights of 2.3m</p>	<p>This is met for the Detailed Component.</p> <p>For the Outline Component, this would be considered upon submission of the reserved matters applications.</p>
<p>Exceed amenity space standards (both private and communal)</p>	<p>In Building B4, a different approach has been taken with flats being oversized internally to make up for a shortfall in balcony space and this is considered acceptable in this instance.</p>
<p>Secure by Design certification</p>	<p>The application has been reviewed by the Metropolitan Police Secure by Design Advisor who is satisfied that it would be able to achieve the security requirements of the Secured by Design principles.</p>
<p>No more than 5% studio flats</p>	<p>For the Detailed Component, 2.1% of the units would be studio flats which are well within the 5% limit.</p> <p>For the Outline Component, exact the unit mix would be confirmed as part of the reserved matters applications.</p>
<p>Maximise the potential of the site</p>	<p>This has been achieved through the substantial contribution made towards the boroughs housing target and the re-provision of B1c floorspace.</p>

Include a minimum 10% of units that are suitable for wheelchair users	The scheme now includes 10% wheelchair provision, to be secured by legal agreement.
Have excellent accessibility within buildings	<p>The accessibility to each of the buildings that form the proposal is acceptable.</p> <p>Step free access would be provided to all parts of the site including access to the retail and commercial units.</p>
Have exceptional environmental performance	<p>The development is capable of achieving BREEAM “excellent” upon fit out of the commercial units; a condition to this effect has been included.</p> <p>The development would need to make a £1.82m carbon off set payment contribution as the residential element is not capable of delivering zero carbon homes. The applicant has agreed to make the payment which makes this aspect of the scheme fully policy compliant.</p>
Minimise noise nuisance between flats by stacking floors so that bedrooms are above bedrooms, lounges above lounges	<p>The submitted plans for the Detailed Component for each of the floor levels containing residential units show a layout where bedrooms are stacked on bedrooms and this is replicated with living areas on top of living areas.</p> <p>For the Outline Component, this would be considered upon submission of the reserved matters applications.</p>
Make a positive contribution to local context, character and communities	The proposed heights would be in compliance with the draft OKR AAP, the scheme provides for a significant proportion of B1(c) provision includes a significant delivery of the linear park. In addition, the scheme would provide new homes, new jobs and new shops for local and new residents.
Include a predominance of dual aspect units	<p>The percentage of dual aspect units in the Detailed Component would be 69.3%.</p> <p>For the Outline Component, 62.4% would be dual aspect.</p>
Have natural light and ventilation in all kitchens and bathrooms	The kitchens would have natural daylight and ventilation as part of an

	<p>open plan layout in the detailed component.</p> <p>The positioning of the bathrooms is away from majority of window openings therefore not achieving natural light opportunities, but they would be mechanically ventilated.</p> <p>For the outline component, this would be considered upon submission of the reserved matters applications.</p>
At least 60% of units contain two or more bedrooms	<p>57.2% contain two or more bedrooms which does not meet the required 60%. However 71% of the affordable units would contain two or more bedrooms.</p> <p>For the Outline Component, this would be considered upon submission of the reserved matters applications.</p>
Significantly exceed the minimum floor space standards	<p>Every unit in the Detailed Component meets the minimum floorspace standard.</p> <p>For the Outline Component, this would be considered upon submission of the reserved matters applications.</p>
Minimise corridor lengths by having additional cores (minimising units per core)	<p>All of the buildings within the Detailed Component would have no more than 8 flats per core, complying with the Mayor's Housing Design SPG which advises no more than 8 flats per core.</p> <p>B4 – no more than 8 units per core  B9 – no more than 8 units per core  B10 – no more than 8 units per core  B12 – 2 units per core</p>

#### Conclusion on density

359. To conclude, officers are satisfied that the quality of residential accommodation proposed would be good and would justify the high density of the scheme. All of the flats in the Detailed Component would exceed the minimum requirement for floor sizes.
360. The percentage of dual aspect units overall would be very good at 63.3% which is a very good level of compliance.
361. The accommodation would achieve very good internal daylight levels including good privacy and outlook. Whilst many flats would not include a private balcony space, this is mitigated through the delivery of the substantial new public realm, which

includes the new Linear Park, Central Square, and children's play areas.

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

362. Strategic Policy 13 of the Core Strategy sets high environmental standards and requires developments to avoid amenity and environmental problems that affect how we enjoy the environment. Saved Policy 3.2 of the Southwark Plan states that planning permission for development will not be granted where it would cause a loss of amenity, including disturbance from noise, to present and future occupiers in the surrounding area or on the application site. Furthermore, there is a requirement in Saved Policy 3.1 to ensure that development proposals will not cause material adverse effects on the environment and quality of life.

#### Impact of the proposed uses

363. The re-provision of light industrial floorspace, as well as new uses such as residential, retail, offices and community uses would be compatible with the surrounding land uses which include residential, retail and other commercial uses. In addition, the uses would be compatible with the emerging new developments which include those permitted at Nye's Wharf, 48-53 Glengall Road and Cantium Retail Park which are all mixed use developments. Noise from any machinery and plant can be adequately dealt with by condition to ensure that no harm to surrounding residential amenity would occur. On this basis, it is considered that the proposed uses would not cause any harm to surrounding neighbour amenities, and accordingly are all found to be acceptable uses. Conditions on opening hours and noise have been included on the draft decision notice.
364. It is important to ensure that the development does not prejudice the redevelopment of adjoining sites by including windows on flank elevations of the buildings. In this regard, it is considered appropriate to attach a condition to the draft decision notice to require that no habitable room windows are included on the west facing elevation of the Outline Component Block B1. This is to ensure that any future redevelopment of the London School of Economics single storey building to the west of the site is not prejudiced by habitable room windows within the development.

#### Daylight

365. Chapter 10 of the ES considers the potential daylight and sunlight impacts of the proposed development on surrounding residential properties. This analysis is based on guidance published by the Building Research Establishment (BRE).
366. The BRE sets out the detailed daylight tests. The first is the Vertical Sky Component test (VSC), which is the most readily adopted and the one used in the submitted report. This test considers the potential for daylight by calculating the angle of vertical sky at the centre of each of the windows serving the residential buildings which look towards the site. The target figure for VSC recommended by the BRE is 27% which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The BRE have determined that the daylight can be reduced by about 20% of their original value before the loss is noticeable.
367. The second method is the No Sky Line (NSL) or Daylight Distribution (DD) method which assesses the proportion of the room where the sky is visible, and plots the change in the No Sky Line between the existing and proposed situation. It advises

that if there is a reduction of 20% in the area of sky visibility, daylight may be affected.

368. The submitted daylight (and sunlight) assessment has taken into account the following schemes which have been approved:

- Land at Cantium Retail Park (18/AP/3246);
- Nye's Wharf, Frensham Street (17/AP/4596);
- 49-53 Glengall Road 17/AP/4612)

369. These three schemes are considered due to their proximity to the site and the likelihood of them impacting the daylight and sunlight levels to the existing surrounding residents. Therefore the results included in the following paragraphs are the daylight and sunlight impacts for the scheme with the cumulative impacts of the Cantium, Nye' Wharf and 49-53 Glengall Road included.

370. The submitted report has taken into account the daylight and sunlight impacts for surrounding buildings.

- 54,56,90 and 92 Latona Road
- Denstone House
- Ednam house
- Greystoke House
- Northfield House
- 18-24 Peckham Park Road
- Space Studios, 90 Haymerle Road

Image: Location of surrounding residential buildings



Significance criteria

371. The ES has developed criteria to categorise the magnitude of any impacts that exceed those preliminary numerical guidelines and then assess the level of significance of the effects in each case as per the table below.

Table: Significance matrix

<b>Magnitude of impact</b>	<b>Sensitivity of receptor</b>		
	<b>High</b>	<b>Medium</b>	<b>Low</b>
<b>High</b>	Severe/Major	Major/Moderate	Moderate/Low
<b>Medium</b>	Moderate	Moderate	Minor
<b>Low</b>	Minor	Minor	Minor
<b>Negligible</b>	Not Significant	Not Significant	Not Significant

372. A summary of the effects on VSC is found in the table below.

Table: Summary of cumulative VSC impacts

<b>Property</b>	<b>Total no. of windows tested</b>	<b>Windows satisfying BRE</b>		<b>No. of windows not satisfying BRE</b>		
		<b>Number</b>	<b>%</b>	<b>0.79 - 0.60 x former value</b>	<b>0.59 – 0.40 x former value</b>	<b>&lt;40 X former value</b>
54, 56, 90 and 92 Latona Road	24	7	29	13	4	0
Denstone House	12	0	0	6	6	0
Ednam House	96	4	4	8	15	69
Greystoke House	34	17	50	0	13	4
Northfield House	127	35	28	39	2	51
18-24 Peckham Park Road	11	5	45	4	2	0
Space Studios, 90 Haymerle Road	91	23	25	23	7	38

373. A summary of the effects on DD is found in the table below.

Table: Summary of cumulative DD impacts

Property	Total no. of rooms tested	Rooms satisfying BRE		No. of rooms not satisfying BRE		
		Number	%	0.79 - 0.60 x former value	0.59 – 0.40 x former value	<40 X former value
54, 56, 90 and 92 Latona Road	12	12	100	0	0	0
Denstone House	12	12	100	0	0	0
Ednam House	84	18	21	10	17	39
Greystoke House	12	9	75	2	1	0
Northfield House	124	89	72	22	6	7
18-24 Peckham Park Road	10	9	90	1	0	0
Space Studios, 90 Haymerle Road	48	25	52	6	6	11

374. Out of the 395 windows tested, 91 (23%) would satisfy the BRE Guidelines and either retain a VSC of at least 27% or at least 0.8 times their former value.

375. In terms of Daylight Distribution of the 302 rooms considered, 174 (58%) would satisfy the BRE Guidelines and retain at least 0.8 times their former daylight area.

376. Within the remaining properties tested, not all the windows/rooms would meet the BRE Guidelines for both VSC and DD and therefore these properties are discussed in further detail as follows.

54, 56, 90 and 92 Latona Road

377. These properties are located south-west of the site. The properties are duplex flats; 54 and 56 occupy rooms at ground and first, and 90 and 92 occupy rooms at second and third. The four flats have been modelled internally using estimated room layouts from external inspection. There are a total of 24 windows serving 12 rooms which have been considered for daylight.

378. For 54 and 56 Latona Road, nine windows narrowly miss the guideline with results of 0.75 and 0.76 times their former value in respect of VSC. All six rooms tested for daylight distribution comfortably reach and exceed the BRE Guidelines.

379. For 90 and 92 Latona Road, two windows in each property surpass the BRE 27% VSC guideline. Of the remaining windows, there are four at second floor that range between 0.41 and 0.53 times their former values. The other four windows at third floor range have results of 0.72 and 0.73 times their former values. These windows are recessed and below over hanging balconies. The BRE guide acknowledges that balconies and projecting wings to existing neighbouring buildings artificially limit the available daylight and, therefore, larger relative reductions in light may be unavoidable. All six rooms tested for daylight distribution would still comfortably reach and exceed the BRE Guidelines.
380. The adverse impact on this property is therefore of **minor significance**.

#### Denstone House

381. This three-storey block of residential flats is located south of the site and has been modelled internally using example estate agent plans and it has been assumed that each floor has the same room configurations.
382. For VSC, none of the windows satisfy the BRE Guidelines. There are two windows on each floor which from external inspection appear to be secondary bedrooms. These six windows range from 0.69 to 0.73 times their former VSC value. The other six windows are beneath deep eaves or overhanging balconies and appear from external inspection appear to be kitchens. As stated above, the BRE guide acknowledges that balconies and projecting wings to existing neighbouring buildings artificially limit the available daylight and, therefore, larger relative reductions in light may be unavoidable. These windows range from 0.56 to 0.59 times their former VSC value.
383. All rooms tested for daylight distribution comfortably reach and exceed the BRE Guidelines. Four of the 12 rooms do not receive any loss in their day lit area.
384. The impacts on these properties are therefore of minor significance.

#### Ednam House

385. This seven-storey block is located south of the site and has residential rooms from first to sixth floor with deck access. It has been modelled internally using estimated flat layouts based on the pattern of windows from external inspection. From external inspection, it is also thought that the main habitable living spaces face away from the development site and it just bedrooms and kitchens that face the development site.
386. For VSC, of the 96 windows tested four windows satisfy the BRE Guidelines. These four windows are located at the west end of the building at fifth and sixth floor, and they do not have balconies above them. There are another eight windows at the west end of the building without overhanging balconies above them, which retain between 0.64 and 0.69 times their former VSC value.
387. The VSC results for the windows at the west end of the building contrast with those for the windows beneath balconies to much of the central part of the elevation, and the east end of the property which sits adjacent the committed Nye's Wharf scheme.
388. For daylight distribution 18 out of the 84 rooms tested satisfy the BRE Guidelines. The 18 rooms again tend to be at the west end of Ednam House, with those that do not meet the BRE Guidelines located in the central section of the elevation, beneath

the overhanging balconies and on the lower three floors, and the east end adjacent the Nye's Wharf scheme. The rooms on the elevation analysed consist of hallways, bathrooms, kitchens and some second bedrooms, with the key habitable rooms on the south elevation.

389. An assessment of these rooms without the balconies in the proposed scenario found the results to materially improve with 32 rooms now adhering to the BRE Guidelines and across the spread of results a material improvement is seen. This serves to illustrate the large impact the deck access and overhanging balconies have on the daylight results. As mentioned above, the main habitable spaces all face away from the development site and so it is predominantly only kitchens and bedrooms that are impacted.
390. On this basis, the overall effect on this property is considered to be of moderate significance.

#### Greystoke House

391. This property is in residential use and is six storeys in height. The property is located south of the site. The plan for the ground floor was obtained by the applicant so this has been copied up through the rest of the floors.
392. For VSC, 17 of the 34 windows tested satisfy the BRE Guidelines. The window transgressions are spread over the six floors. Four of those that do not reach the BRE Guidelines are very small windows that are recessed, below balconies, and light the living rooms at first to fourth floor. However, each of these four living rooms is multi-aspect and lit by at least three other windows that meet the BRE Guidelines for VSC. These living rooms retain very good daylight distribution (see below) so the VSC results to the small recessed windows are an anomaly.
393. The remaining windows that fail are located on the north elevation of the building and would retain between 0.52 and 0.55 times their former value. These factors of former VSC values are due to most of these windows achieving such high VSC values in their existing condition, as they currently look out over low level light industrial buildings. Therefore, any substantial development on this site would have a larger relative impact on the retained percentage figures. The majority of windows would retain VSCs of over 19%, which remains good for an urban setting.
394. Nine of the 12 rooms tested for daylight distribution comfortably reach and exceed the BRE guidelines. The three that do not are bedrooms at first to third floor and range from 0.64 to 0.78 times their former values.
395. Based on the assessment found above, the impacts to this property are considered to be of minor significance.

#### Northfield House

396. This block of residential flats is five storeys in height and was modelled internally using plans from the council website and supplemented by estate agent plans as example flats. This property is located east of the Application Site and the three elevations facing the site have been tested. The applicant has advised that most of the rooms facing the development site are kitchens and bedrooms with the main habitable spaces on the other side of the building.
397. For VSC, 35 of the 127 windows tested achieve the BRE Guidelines. The VSC

transgressions predominantly occur to the ground to third floor. All the windows tested which fail to meet the BRE Guidelines, are again under projecting balconies. In addition, some of the worst affected windows, which drop into the lower bands of deviation from the 0.8 BRE target, sit alongside the projecting stair cores or are in the corners of the elevations and, therefore, larger relative reductions in light may be unavoidable.

398. For daylight distribution 89 out of 124 rooms satisfy the BRE Guidelines. The 2018 ES reported 92 rooms adhered to the guidelines. Those rooms that do not are located on the most northern elevation analysed, at ground to second floor. Again, these rooms are all beneath the deck access/balconies, and as such analysis with the deck access/balconies removed has been run and shows a greatly improved level of BRE guideline adherence with 120 now adhering. As mentioned above, the main habitable spaces all face away from the development site and so it is predominantly only kitchens and bedrooms that are impacted.
399. Due to the above data, with and without the balconies in place, the adverse impact on this property is therefore of moderate significance.

#### 18-24 Peckham Park Road

400. 18-20 Peckham Park Road are two properties in commercial use at ground floor and residential at first. Floor plans for these properties were not obtained and therefore room configurations were assumed from external inspection. The report assumes window R1/25 is a landing in 18-20 Peckham Park Road and therefore has been scoped out of our assessment.
401. Apart from one room at first floor in 22-24 Peckham Park Road, the results show that all ten rooms tested comfortably satisfy the BRE guidelines for daylight distribution. The one which narrowly misses the guidelines, receives 0.74 times its former VSC value.
402. For VSC, five out of the eleven windows tested satisfy the VSC BRE guidelines. The other windows sit alongside projecting rear extensions, which is likely to be a contributing factor. They range from 0.56 and 0.64 times their former value, and in the main, nevertheless receive actual VSC value of between 16% and 20%, which remain good for an urban setting.
403. The impacts to this property are therefore of minor significance.

#### 90 Haymerle Road, "Space Studios"

404. This large commercial building is three storeys in height and is currently used as artist studios. The planning consent for this building was granted for open B1 use in 2010 (ref: 10/AP/2351) and the layout plans show open plan layouts. However, it is known that the building is currently used as artists' studios and has been compartmentalised for this use. The internals have therefore been modelled using plans obtained by the studio's surveyor.
405. For VSC, 23 out of 91 windows analysed satisfy the BRE guidelines. The windows located on the northern elevation show the largest percentage reductions due to their existing VSCs being near the maximum value of 40% for a completely unobstructed vertical window.
406. There are four windows at ground floor that face west and narrowly miss the BRE

guidelines. The other remaining windows that do not meet the BRE Guidelines are predominantly located at the first and second floor on the elevations that look out over the flat roof over ground floor. Retained values are between 0.25 and 0.53 times their former value on the east facing elevation and 0.60 and 0.75 times their former value for the south facing elevation.

407. For daylight distribution, the results based on the compartmentalised layouts show 25 out of the 48 rooms tested satisfy the BRE guidelines. The rooms that do not appear on the northern elevation of the building and also on the east elevation at first and second which look out over the flat roof. Again, the majority of these rooms are all very well-lit in the existing condition; many of those with 100% daylit areas, and so any meaningful redevelopment of the site is likely to cause a significant percentage reduction in the day lit area.
408. Based on the compartmentalised layouts and considering of the above information, the adverse impact on this commercial property is therefore of moderate significance.

#### Glengall Road

409. The applicant has carried out some daylight testing to the Glengall Road properties in the light of the objection received from the Glengall Road Residents Association (to no's 33 and 35 Glengall Road which are closest to the site). The results clearly show that these properties would continue to receive very good levels of daylight with the proposed development in place. As an example, the worst affected window would be a 1<sup>st</sup> floor window to No. 33 Glengall Road which would receive a reduction of 7%, which is well within the 20% tolerance of the BRE (from 21.82% VSC, to 20.24% VSC). Accordingly, there would be no adverse impacts to the Glengall Road properties.

#### Daylight within future surrounding properties

410. As noted above, Nye's Wharf, 49-53 Glengall Road and the Land at Cantium Retail Park have been identified as committed schemes to be considered as part of the cumulative scenarios. The applicant has therefore considered how the scheme would impact upon the residential units which will be delivered as part of those schemes. In general terms, those surrounding schemes should continue to receive reasonable levels of daylight. One area that has been flagged as a concern is the relationship between the outline Block B7 and the Nye's Wharf redevelopment as the distance between the habitable rooms within B7 and the Nye's Wharf building is 2.3m which does limit the amount of daylight received by those windows. However, the applicant has committed to re-looking at this relationship again when the reserved matters application for B7 is submitted to maximise the availability of daylight and sunlight.

#### Conclusion on daylight

411. Overall, the daylight impact assessments in the proposed cumulative scenario show that 23% of the windows tested meet the BRE criteria for VSC and 58% of the rooms meet the DD test.
412. The results of the daylight assessment do show that there would be a number of rooms that would not meet the relevant daylighting standards of the BRE, with properties on Latona Road, Denstone House, Greystoke House, Peckham Park Road, Ednam House, Northfield House and Haymerle Road affected.

413. In these instances it is recognised that there would be a degree of harm to the daylight amenity of residents, but this harm is considered on balance to be acceptable in this urban location, and when taking into factors such as overhanging walkways and balconies which already limit the amount of daylight received by the windows. Given the context of the site, these results are indicative of a relatively good retained level of daylight.
414. Considering the daylight impacts overall, the harm that would be caused to some properties is on balance considered to be acceptable.

Sunlight

415. The existing levels of sunlight received by the properties have been quantified using the APSH in both the annual and winter conditions. The initial BRE target for each test is 25% APSH for annual sunlight of which 5% for winter APSH. The cumulative schemes mentioned in paragraph 369 above (Nye's Wharf, 49-53 Glengall Road and Cantium Retail Park) have been included in the assessment.

Table: Summary of Annual Probable Sunlight Hours (APSH) Impacts

Property	Total no. of windows tested	Annual sunlight					Winter sunlight				
		Windows satisfying BRE		No. of windows not satisfying BRE			Windows satisfying BRE		No. of windows not satisfying BRE		
		No	%	0.79-0.6 x former value	0.59-0.4 x former value	<0.4 x former value	No	%	0.79-0.6 x former value	0.59-0.4 x former value	<0.4 x former value
22-24 Peckham Park Road	4	4	100	0	0	0	4	100	0	0	0
Northfield House	10	10	100	0	0	0	10	100	0	0	0
Greystoke House	27	27	100	0	0	0	27	100	0	0	0
Space Studios, 90 Haymerle Road	49	41	84	0	4	4	38	78	0	0	11

416. 22-24 Peckham Park Road, Northfield House and Greystoke House all adhere to the

BRE APSH guidelines. Therefore, the potential effects of the scheme to sunlight amenity to these properties would be of negligible significance.

417. For Space Studios at 90 Haymerle Road, 41 of the 49 windows tested adhere to the annual APSH target and 38 of the 49 windows tested adhere to the winter APSH target.
418. Where rooms are lit by more than one window it is sensible to consider the aggregate amount of sunlight reaching the room. The BRE guide advises as follows: "If a room has multiple windows on the same wall or adjacent walls, the highest value APSH should be taken. If a room has two windows on opposite walls, the APSH due to each can be added together." In this case only one room does not achieve the target for annual APSH and only 3 rooms do not achieve the winter APSH target.
419. Based on the results, the impacts of the development upon this property would be of minor significance.

#### Conclusion on sunlight

420. As with daylight, there are a number of windows which would not meet the BRE guidelines for summer and winter sunlight. However, the extent of non compliance is considered minor overall, and is to be considered on balance to be acceptable.

#### Overshadowing

421. The transient overshadowing assessment for the proposed development are presented within the ES and the results are discussed in detail in the following commentary.
422. The BRE guidelines state that for an amenity area to appear adequately sunlit throughout the year, at least 50% of the area should receive at least two hours of sunlight on 21<sup>st</sup> March.
423. The shadow diagrams show that the majority of neighbouring amenity areas would not be in the shadow of the proposed buildings. This includes the Leyton Square playground to the south of the site which would be unaffected by the proposals as the buildings would be located to the north of the playground. Some more distant neighbouring amenity spaces may receive some shadow into the late evening when the shadows are at their longest. However, these would not cause shadow for more than one hour on the 21<sup>st</sup> March and accordingly the scheme would have no adverse impact.
424. The cumulative transient overshadowing analysis undertaken includes Glengall Road, Nye's Wharf and Land at Cantium Retail Park. The cumulative transient overshadowing visuals show that any shadow to amenity areas in the surrounding area is caused by the committed schemes. The scheme would therefore not add to any overshadowing to that which the committed sites are causing to neighbouring amenity areas.
425. Comments have been received from Glengall Road Residents Association (GRA) raising concern of the impact of the shadows that would be cast of their rear gardens from the proposed buildings. The transient overshadowing assessment does show that shadows from the proposed buildings would be cast over these rear gardens at 8am on March 21<sup>st</sup>, but by 9am these shadows have moved round and would no

longer cast a shadow to the gardens. On this basis, the impacts to the Glengall Road gardens are considered acceptable.

#### Overlooking to surrounding occupiers

426. In order to prevent harmful overlooking, the Residential Design Standards SPD 2011 requires developments to achieve a distance of 12m at the front of the building and any elevation that fronts a highway and a minimum of 21m at the rear.
427. The nearest existing residential properties are within Ednam House to the south of the site which are well over 30m away and Northfield House to the south-east of the site, which is over 50m away, thereby fully achieving the minimum 21m required .
428. Overlooking distances to the habitable rooms within the approved scheme at Cantium Retail Park would also be sufficiently distanced to prevent harmful overlooking.
429. The distance to the approved scheme at Nye's Wharf at the closest point would be very close at 2.3m, however a condition was imposed on that scheme to require the re-positioning these windows on the facing elevation further south on the façade which would mean that no direct overlooking would arise.
430. The distance from Building B10 to Space Studios would be 12.4m but as Space Studios does not contain residential accommodation, it is felt this distance is appropriate and acceptable.

#### Light pollution and solar glare

431. The lighting strategy would ensure a safe, accessible and welcoming public realm and allow use of the amenity spaces after dark. The lighting would be designed to prevent spread of light in an upward direction. Spill of light beyond the site boundary would be avoided preventing any impact on adjacent buildings. The lighting would be of an energy efficient design, and full details can be requested by condition.
432. Light spill and lighting impacts on biodiversity will be mitigated through its design, targeting light where it is needed and using down light from columns. Lighting design would also be used to pick out key features such as furniture, water and trees and assist with way finding.

### **Transport issues**

#### Context

433. Core Strategy Strategic Policy 2 encourages walking, cycling and the use of public transport rather than travel by car. Saved Policy 5.1 of the Southwark Plan states that major developments generating a significant number of trips should be located near transport nodes. Saved Policy 5.2 advises that planning permission will be granted for development unless there is an adverse impact on transport networks; and/or adequate provision has not been made for servicing, circulation and access; and /or consideration has not been given to impacts of the development on the bus priority network and the Transport for London (TfL) road network.
434. In addition, Southwark have recently adopted the Movement Plan, a people, place and experience approach to transport planning.

435. The Mayors Transport Strategy (MTS) includes three strategic challenges that are of significant importance to assessing this application, namely:
- Vision Zero
  - Healthy Streets
  - Air Quality
436. The submitted Transport Assessment (TA) has complied with Transport for London guidance and is considered to provide a comprehensive appraisal of the relevant transport and highway related matters including an assessment of the potential for journeys to be made by sustainable modes of transport as well as detailed estimates of vehicular trips resulting from the development.

#### Location

437. The site is located close to the A2 Old Kent Road in Southwark, is part of the Transport for London Road Network (TRLN), and is strategically located with Central London to the north west, Bermondsey and Canada Water to the north east, New Cross and Lewisham to the south east.
438. The site is bounded by Haymerle Road to the West, Frensham Street to the East and Latona Road to the South. It has a Public Transport Accessibility Level (PTAL) of 3 (moderate). The PTAL will increase with the proposed permeability improvements arising from this and adjacent sites, and through anticipated public transport improvements in the form of the proposed Bakerloo Line Extension and increased bus frequencies and other service improvements.
439. The site is located within a Controlled Parking Zone (CPZ).
440. There are poor pedestrian links connecting the site to the Old Kent Road with Glengall Road and Peckham Park Road being the closest routes.

#### Site layout

441. The proposed future site layout will significantly improve the permeability of the area through the creation of new east-west routes through the Linear Park and Central Square and also north-south through the opened up Malt Street. It would also connect Latona Road to Frensham Street.

#### Section 278 works

442. To accommodate the proposed access requirements, Southwark's highways are looking at changes to the traffic management in the area and will be detailed up as part of the S278 agreement. The S278 works will ensure pedestrian safety is prioritised in all changes to the public highway.

#### Trip generation

443. Once fully built and occupied, the vehicular trip generation from the proposed development is estimated to be as shown in the tables below for the Residential and Commercial element.

Table: Residential trips

<b>Residential Trips: Total Person</b>									
		<b>Detailed (420 units)</b>				<b>Outline (up to 880 units)</b>			
		<b>AM peak</b>		<b>PM peak</b>		<b>AM peak</b>		<b>PM peak</b>	
		<b>Arrive</b>	<b>Depart</b>	<b>Arrive</b>	<b>Depart</b>	<b>Arrive</b>	<b>Depart</b>	<b>Arrive</b>	<b>Depart</b>
08:00 - 09:00	<b>Transport Assessment</b>	50	230	118	80	105	482	248	168
	Walk	11	50	26	18	23	106	54	37
	Cycle	3	14	7	5	6	28	15	10
	Bus	24	109	56	38	50	229	118	80
	Rail	7	34	17	12	15	70	36	25
	Car Driver	2	11	5	4	5	22	11	8
	Car Passenger	1	5	2	2	2	10	5	3
	Taxi	1	6	3	2	3	12	6	4
	Revised (May 2019)	44	207	141	67	92	434	295	140
08:00 - 09:00	Walk	10	45	31	15	20	95	65	31
	Cycle	3	12	8	4	5	26	17	8
	Bus	21	98	67	32	44	206	140	67
	Rail	6	30	21	10	13	63	43	20
	Car Driver	2	10	6	3	4	20	14	6
	Car Passenger	1	4	3	1	2	9	6	3
	Taxi	1	5	3	2	2	10	7	3

Table: Commercial trips

<b>Commercial Person assumed Trip by Mode</b>									
		<b>Phase 1 (1,796sqm)</b>				<b>Phase 2 &amp; 3 (up to 3,704sqm)</b>			
		<b>AM peak</b>		<b>PM peak</b>		<b>AM peak</b>		<b>PM peak</b>	
		<b>Arrive</b>	<b>Depart</b>	<b>Arrive</b>	<b>Depart</b>	<b>Arrive</b>	<b>Depart</b>	<b>Arrive</b>	<b>Depart</b>
TA (July 2017)									
Walk		6	0	1	6	12	1	1	13
Cycle		4	0	0	4	8	0	1	8
Bus		18	1	2	19	37	2	4	38
Rail		10	1	1	11	20	1	2	21
Car driver		0	0	0	1	2	0	0	3
Passenger		1	0	0	1	2	0	0	3
TA (October)									
		<b>Phase 1 (1,982sqm)</b>				<b>Phase 2 &amp; 3 (5018sqm)</b>			

2018)	AM peak		PM peak		AM peak		PM peak	
	Arrive	Depart	Arrive	Depart	Arrive	Depart	Arrive	Depart
Walk	6	0	1	7	16	1	2	17
Cycle	4	0	0	5	11	1	1	11
Bus	20	1	2	20	49	3	5	51
Rail	12	1	1	12	27	1	3	29
Car driver	0	0	0	0	1	0	0	1
Taxi	1	0	0	1	3	0	0	3

### Walking

444. As part of the TA a Pedestrian Environment Review System (PERS) Audit was carried out in September 2016. It indicated that pedestrian environment within the vicinity of the site is generally average or above average, and sets out a small number of localised improvements that would be beneficial to users of the surrounding area.
445. The Linear Park south of the Old Kent Road will be able to be substantially completed on delivery of this development (with Cantium). This will hugely improve the pedestrian experience in this area.
446. The proposed development includes the creation of new north / south and east / west pedestrian routes which form part of the wider Old Kent Road Opportunity Area and further enhance pedestrian facilities in the immediate vicinity.

### Cycling

447. The TA includes Cycle Level of Service (CLOs) Audit which was carried out in September 2016 with additional routes added on September 2018. The findings show that the majority of roads surrounding the site were average in terms of suitability for cycling. The road surfaces are generally well maintained and the off-road route through Burgess Park represents a well-marked and signed section of cycle route.
448. A total of up to 2,150 cycle parking spaces would be provided across the scheme. This would be split across the uses as shown in the table below.

Table: Cycle parking

Cycle Parking quantum		
Outline Phase 2-3	Long Term	Short Term (public realm)
Commercial	25	23
Residential	1383	22
<b>TOTAL</b>	<b>1408 spaces</b>	<b>45 spaces</b>

<b>Detailed –Phase 1</b>	Long Term	Short Term (public realm)	
Commercial	11	15	
Residential	660	11	
<b>TOTAL</b>	<b>671</b>	<b>26 spaces</b>	
Total	2079 spaces	71 spaces	<b>2150 spaces</b>

449. Cycling is going to be of critical importance in the movement of people throughout central London therefore the provision of cycle parking and other cycle enabling opportunities is a significant part of the negotiations in the OKR AAP area. A balance is sought between the London Plan cycle parking standards, quality of infrastructure and other cycle opportunities. In this scheme, cycle parking would be provided through a mix of double stackers, Sheffield stands to the equivalent to 1 space per residential unit design to be agreed by condition. There would also be:

- Brompton style cycle hire lockers equivalent to 1 locker per 10% of residential units (10% of which a EV lockers)
- Brompton style cycle hire lockers equivalent to 1 locker per 10% of proposed jobs (10% of which a EV lockers)
- Visitor cycle parking compliant with London Plan but locations to be agreed by condition and where on the public highway as part of the S278 agreements.
- Sustainable transport lockers to accommodate tricycles, scooters, prams, possible cargo bikes.

450. TfL have identified the desire to provide docking stations for the Santander (TfL managed docked cycle scheme) cycle hire when the proposed BLE stations are delivered. This could be achieved in the public highway adjacent the site.

#### Buses

451. The site has convenient access to bus services. Main bus routes connecting to New Cross, Elephant and Castle, London Bridge, Waterloo, Liverpool Street and Kings Cross run along Old Kent Road with stops adjacent to the site.

452. Bus services would need to be increased in the area ahead of the BLE to accommodate the demand generated by additional homes and jobs generally in the Old Kent Road area in advance of the opening of the planned BLE which, subject to the granting of powers and availability of funding, would be 2029/2030 at the earliest. In line with other applications within the Old Kent Road Opportunity Area, it is likely that the charge per residential unit would be £2,700 per unit, the payment of which can be phased over a 5 year period.

#### Bakerloo Line extension running tunnels

453. The current proposals for the BLE involve running tunnels near to but not directly underneath the site. Therefore, there is no requirement for TfL to sign off on the foundation design.

## Car parking

454. The proposed development includes a total of 115 car parking spaces as follows.

Table: Car parking

<b>Basement</b>	
Resi standard Spaces	51
Resi wheelchair spaces	32
Operational spaces	7
<b>Sub total</b>	<b>90</b>
<b>Above Grade</b>	
Resi wheelchair spaces	7
B1c / commercial spaces	12
B1c / commercial wheelchair	2
Car club	4
<b>Sub total</b>	<b>25</b>
<b>Totals</b>	
Resi	90
Resi operational	7
B1c	14
Car club	4
	<b>115</b>

455. The 51 residential car parking spaces are within adopted London Plan 2016 and Southwark Policy. The draft OKR AAP suggests that residential developments in PTAL 5/ 6 should be car free stating a maximum of 0.3 spaces per unit prioritised for family-sized units in areas with lower PTALs. It also states that appropriate car parking provision should also be made for Blue Badge holders. The 7 operational are for the use services for example a plumber or a carer doing work in a residential unit. The current proposal for development would provide 32 accessible parking spaces in the basement area for the development and two disabled spaces would be provided for the commercial element south of Building B10. Car club membership will be provided for residents, which can be secured by the legal agreement with 4 spaces being provided specifically for this use.
456. Officers have raised concerns about the parking levels and that unlike other approved and emerging applications within the draft OKR AAP, this application includes private parking which although is within acceptable levels of adopted regional and local policy does not reflect the vision of the Old Kent Road as car free. However the application is considered to be relatively 'car lite' and the applicant has reduced the amount of car parking from the original submission which was for 154 spaces. The DSP bond will enable monitoring of motorised trips throughout all phases of the scheme.
457. To mitigate the impact of 115 car parking spaces, the applicant has put forward a proposal for 30% of all car spaces to have the ability ('passive') for future adaptation to have electrical vehicle charging points (EVCP) with a further 10% being passive and capable for future adaptation. This would mean that up to 40% of the spaces would have EVCPs, responding directly to the potential future demand. The applicant has

suggested willingness to review this figure again in the future if further demand becomes apparent. This is considered an acceptable and appropriate approach.

- 458. In addition, the applicant has proposed 12 commercial spaces for the B1c use at grade level which officers have questioned and suggested a reduction. An update will be provided in the addendum report.
- 459. To ensure promotion of car lite living is clear to the new occupants of the development, a condition for marketing details will be applied.
- 460. The proposed development would contribute towards the Healthy Streets vision through low car parking and compliant cycle parking provision along with the creation of the new Linear Park which opens up north - south and east - west pedestrian and cycling routes currently not available. The provision of additional EVCP to 40% is a further benefit to securing healthy streets in the long term.
- 461. A condition would also ensure that no future residents or occupiers of the proposed development could obtain resident parking permits for any future CPZ.

Servicing and delivery

- 462. The Draft Delivery and Service Management Plan predict servicing demands for the Malt Street scheme. The motorised vehicle servicing for residential and commercial deliveries per day is shown in the table below.

Table: Residential deliveries

<b>Residential deliveries</b>					
	<b>Units</b>	<b>% of total</b>		<b>By car or light van</b>	<b>Larger vehicles</b>
Building B4	277	66%		25	5
Building B9	48	11%		4	1
Building B10	83	20%		8	1
B12 Apartments	12	3%		1	0
<b>Total</b>	420			38	7

Table: Commercial deliveries

<b>Residential deliveries</b>					
	<b>Units</b>	<b>% of total</b>		<b>By car or light van</b>	<b>Larger vehicles</b>
Building B4	277	66%		25	5
Building B9	48	11%		4	1
Building B10	83	20%		8	1
B12 Apartments	12	3%		1	0
<b>Total</b>	420			38	7

463. The proposed scheme seeks to introduce three loading bays associated with the detailed component, with one to the north of the Building B4, one within Building B10 and one south of Building B9. The spaces offer access for general deliveries within the site boundary throughout the day for HGVs/panel vans/LGVs/small vans and refuse collection vehicles.
464. Building B4 Loading Bay. The bays are located north of Building B4. The bays have capacity to accommodate up to one articulated HGV plus one 10m rigid at a time, or alternatively two 10m rigid vehicles or up to 4 transit sized vehicles. The bays can be accessed via Malt Street. The bays provide a minimum of 48 half hour delivery slots over a 12hr day.
465. Building B9 Loading Bay. The bay is located south of Building B9 on Latona Road. It has capacity to accommodate one articulated HGV or one 10m rigid vehicle, or two transit sized vehicles. The bay provides a minimum of 24 half hour delivery slots over a 12hr day.
466. Building B10 Loading Bay. The loading bays are located within B10 and can be accessed via Latona Road. The bay has capacity to accommodate two 10m rigid vehicles or transit sized vehicles. The bays provide a minimum of 48 half hour delivery slots over a 12hr day.
467. In order to ensure that on-street servicing and deliveries do not negatively impact on the highway network, the council is recommending that applicants in the Old Kent Road Opportunity Area enter into Delivery Service Plan Bonds against their baseline figures for all daily servicing and delivery trips. These bonds would be calculated at £100 per residential unit and £100 per 500 sqm of non-residential floor-space. In accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010, this is not intended as a financial penalty, but as a means of mitigating any harmful impacts from the proposed development and ensuring a better quality of life for current and future residents. As such, it is considered to meet the CIL Regulations 122 test, in that it would be:
- (i) necessary to make the development acceptable in planning terms;
  - (ii) directly related to the development; and
  - (iii) fairly and reasonably related in scale and kind to the development.
468. The proposal is for the management of the new development to monitor the daily vehicular activity of the site both commercial and residential, quarterly for a period of 2 years from 75% occupancy. If the site meets or betters its own baseline target the bond will be returned within 6 months of the end of the monitoring period. If the site fails to meet its own baseline the bonded sum will be made available for the council to utilise for sustainable transport projects in the ward of the development. The council will retain £1,600.00 for assessing the quarterly monitoring. The bond in this instance would be £131,400 based on the 1,300 residential units and 7,000 sqm of non residential floor space. The applicant has agreed to the contribution which can be collected via the S106 legal agreement.

### Waste Management

469. A Waste Report containing a Site Waste Management Plan has been submitted outlining the strategy for refuse collection. Each residential block core would contain a dedicated waste deposit room for the residents with the exception of B12 where residents will have kerbside collection.

470. A facilities management team would move the bins from the deposit areas to the large waste holding stores across the site. These would be collected weekly through a dedicated servicing bay, designed to accommodate the refuse collection vehicle. Each large refuse store, of which there are three, are serviced from a different street within the site - Latona Road, Frensham Street and Malt Street. Similarly, commercial waste will also be stored within the two dedicated commercial waste stores across the site which would also be collected using the same service route as the residential waste.

#### Conclusion on transport

471. Despite the provision of car parking, this development is supported because it provides good quality pedestrian and cycle permeability, has residential management to reduce the impact of servicing and delivery and allows for the emerging plans for the surrounding public highway to be facilitated, subject to the following obligations and conditions:
- delivery and service plan bond details of parking, servicing and delivery management to encourage safety and sustainability;
  - detailed design of the basement and servicing layout; and its relationship with the public highway.
  - a bus contribution for TfL;
  - car club membership;
  - publicly accessible cycle hire and membership;
  - detailed design of cycle parking;
  - condition to ensure residents would not be eligible for parking permits in the controlled parking zone, or any future cpz;
  - s.278 works with the council for highway works, tree planting and traffic management changes,
  - a condition for a detailed construction and environmental management plan;
  - condition for marketing details to ensure promotion of car free living; is clear to the new occupants of the development; and
  - a condition for a detailed construction and environmental management plan.

#### **Noise and vibration**

472. A Noise and Vibration Assessment has been undertaken as part of the ES to determine the likely noise impacts from the proposed development. Existing noise surveys were carried out as part of this assessment, the latest of which were carried out in 2016. It was found that the noise from construction may occasionally be classified as moderate adverse. It is therefore recommended that a demolition and construction management plan be secured by condition in order to ensure that best practice methods are used to mitigate noise as far as possible. In terms of considering the quality of the new residential use, the site was found to be suitable for residential accommodation with measures such as an acoustic façade, glazing and ventilation systems included. It is also recommended that conditions be included to ensure that residential uses located above a commercial use are sufficiently protected from any adverse noise impacts.

#### **Planning obligations (S.106 undertaking or agreement)**

473. Saved Policy 2.5 of the Southwark Plan and Policy 8.2 of the London Plan advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. Saved Policy 2.5 of the Southwark Plan is reinforced by the recently adopted Section 106 Planning Obligations 2015 SPD, which sets out in detail the type of development that qualifies for planning obligations. Strategic Policy 14

'Implementation and delivery' of the Core Strategy states that planning obligations will be sought to reduce or mitigate the impact of developments. The NPPF which echoes the Community Infrastructure Levy Regulation 122 which requires obligations be:

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

474. The application would be supported by the following s106 obligations:

Planning Obligation	Mitigation	Applicant Position
Archaeology	£11,171.00	Agreed
Affordable housing monitoring	£68,822.00 (Up to 520 affordable units based on 1,300 homes x £132.35)	Agreed
Carbon Offset – Green Fund	£1,820,792.00	Agreed
Delivery and service bond	£131,400.00 (1,300 homes x £100) + ((7,000sqm/500) x £100	Agreed
Greenfield run off rates	£366 per cubic metre	Agreed
Private amenity space	£78,105.00	Agreed
Transport for London Buses	To be confirmed but likely to be £2,700 per residential unit	Awaiting outcome of TfL discussions.
Transport for London Legible signage	Funded through CIL	Agreed
Transport for London Healthy Streets	Funded through CIL	Agreed
Transport for London cycle hire contribution	Funded through CIL	Agreed
Voluntary youth employment training Course (see paragraph 476 below)	£12,600	Agreed
Voluntary sports pitch resurfacing contribution in Leyton Square (see paragraph 477	In the event it is not carried out a payment of £50,000 to be paid in lieu	Agreed

below)		
Admin fee	2% for all cash contributions plus flat fee of £2,000 for costs incurred in transferring TfL buses contribution	Agreed

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

- Affordable housing provisions, including provision for an early stage review;
- Marketing, allocation and fit out of the wheelchair units
- Independent retail provision
- Phasing plans
- Appointment of workspace co-ordinator;
- Affordable workspace – length of term (in the region of 30 years) at £17 per sq ft (maximum) to the end user
- Linear Park delivery provisions - delivery of the park and establishment of a management company to set up and run and manage the park, including management and maintenance of Frensham Street Park
- Public access to open space and park
- Public realm works plan
- Construction phase jobs
- Local economy – end use jobs/ contributions and employment
- Highway works – s278 works
- Car park design and management plan
- Car club membership for 3 years
- Connection to a future district heating system
- Site management strategy
- London Living Wage – best endeavors to being offered to all staff employed in the commercial units as well as workers during the construction period
- Demolition and construction management plans
- Delivery and service management plan;
- Public realm works plan
- Submission of a Public Art Strategy
- Connection to a district heating system
- Unwin and Friary Landscaping (including engagement with local community)
- Securing of Fabrik to deliver the landscape detailed design and Rolfe Judd to deliver the building detailed design, unless otherwise agreed.

476. As referred to above in paragraph 474 above, the applicant has agreed to fund a youth employment training course which is a contribution of £12,600 to upskill young adults in I.T to help them become job ready. It is proposed that the course would be held three times a week for 26 weeks. This project has been offered to the local community following discussions that have taken place with the Unwin and Friary Tenants Association.

477. In addition, the applicant has agreed to re-surfacing the hard surfaced sports court in

the Leyton Square playground with a safer and more usable 3G astroturf within two years from the commencement of the development. This project has been offered to the local community following discussions that have taken place with the Unwin and Friary Tenants Association.

478. The applicant has also agreed to develop and implement a Community Plan that will provide the platform from which new and existing residents can be heard and contribute to the future successes of the area. This includes the following:

- Involving the community in landscape design, management and maintenance for some areas of the new public realm (e.g. land between the Unwin and Friary and Latona Road).
- Creation of new community forums for the new residents and connect this with existing resident and tenant associations in the area.
- Introduce a series of annual events that can be led by the community for the community that occur within the public realm (e.g. theatre performances within the central square).
- Involve the community in the sculpture park concept e.g. running art competitions for temporary exhibition material to be installed within the public realm.
- A detailed community engagement programme to expand on the above aims.

479. In conclusion, the S106 heads of terms agreed would satisfactorily mitigate against the adverse impacts of the proposed development. The local community projects have been offered as additional projects by the applicant and are welcomed.

480. In the event that a satisfactory legal agreement has not been entered into by 3 December 2019 it is recommended that the Director of Planning refuses planning permission, if appropriate, for the following reason:

“The proposal, by failing to provide for appropriate planning obligations secured through the completion of a S106 agreement, fails to ensure adequate provision of affordable housing and mitigation against the adverse impacts of the development through projects or contributions in accordance with saved policy 2.5 'Planning Obligations' of the Southwark Plan (2007), strategic policy 14 'Delivery and Implementation' of the Core Strategy (2011), policy 8.2 'Planning obligations' of the London Plan (2015) and the Planning Obligations and Community Infrastructure Levy SPD (2015)”.

### **Mayoral and Borough Community Infrastructure Levy (CIL)**

481. Section 143 of the Localism Act states that any financial contribution received as community infrastructure levy (CIL) is a material “local financial consideration” in planning decisions. The requirement for payment of the Mayoral or Southwark CIL is therefore a material consideration. However, the weight attached is determined by the decision maker. The Mayoral CIL is required to contribute towards strategic transport investments in London as a whole, primarily Crossrail, while Southwark’s CIL will provide for infrastructure that supports growth in Southwark.

482. In this instance a Mayoral CIL payment of £7,046,160.01 and a Southwark CIL payment of £28,222,957.84 would be required (these are approximate figures). These are pre-social housing relief figures and accordingly would be reduced when the CIL Social Housing Relief claim is submitted after the grant of planning permission.

## **Sustainable development implications**

### **Energy**

483. Policy 5.2 of the London Plan requires major developments to provide an assessment of their energy demands and to demonstrate that they have taken steps to apply the Mayor's energy hierarchy. Policies 5.5 and 5.6 require consideration of decentralised energy networks and policy 5.7 requires the use of on-site renewable technologies, where feasible. The residential aspect of the proposal would be expected to achieve zero carbon, and the commercial aspect a 35% reduction against part L of the Building Regulations 2010.
484. The applicants have submitted an Energy Strategy and a Sustainability Assessment for the proposed development which seek to demonstrate compliance with the above policies.

#### Be lean (use less energy)

485. Through active and passive design, there would be a 5.20% reduction in CO2 emissions and an 11.42% reduction in energy used. This has been achieved from using energy efficient lighting and improvements to the building fabric.

#### Be clean (supply energy efficiently)

486. A community heating system and a Combined Heat and Power Plant (CHP) is proposed. The site wide energy centre will be future proofed to allow connectivity to the South East London CHP (SELCHP) District Heating Network (DHN) when it becomes available in the future. This would be secured through the Section 106 Agreement. Officers are currently developing a District Heat Network scheme with GLA and Veolia (the operators of SELCHP).

#### Be green (low or carbon zero energy)

487. Roof mounted PV arrays are proposed to provide a green source of electricity to be utilised on site.
488. For the residential element, a 35.04% carbon reduction would be achieved falling short of the zero carbon requirements as set out in policy 5.2 of the London Plan, amounting to a 1,011.551 CO2/per year tonne shortfall. For the commercial element, a 35.46% improvement over Part L would be achieved, meeting the 35% target.
489. Recognising that the residential aspect falls below the policy requirements in relation to carbon savings, a contribution towards the council's carbon offset fund would be required. Calculated on the basis of £1,800 per tonne, the residential component would generate a contribution of £1,820,792. The applicant has agreed to make the contribution of £1,820,792 to the carbon off set fund which would therefore make this aspect of the scheme fully policy compliant. No payment would be required into the carbon off set fund for the commercial element of the scheme.
490. The carbon offset fund could be used for the installation of PV panels on existing buildings, insulation, energy efficient street lighting, tree planting, LED lightbulb exchanges, homeowner grants to replace boilers, funds for community led- projects etc.

#### Overheating

491. The submitted Energy Statement has included an overheating analysis to demonstrate that the proposed new commercial and residential accommodation would mitigate overheating.
492. The report demonstrates that appropriate mitigation has been proposed through the reduction of the overall amount of glazing, choice of glazing and use of internal blinds to reduce the overall risk of overheating. A night time cooling strategy for living rooms and bedrooms has also been proposed. Therefore this aspect of the scheme is considered to be acceptable.

### **BREEAM**

493. Strategic policy 13 of the Core Strategy requires the commercial units to achieve BREEAM 'excellent'. A BREEAM Pre-assessment report has been undertaken which demonstrates that a "very good" standard can be achieved for the retail units. This falls short of the "excellent" standard required by the condition. The pre-assessment report does identify areas where possible improvements can be made at fit out stage of the units. A planning condition is recommended to secure a revised independently verified BREEAM report demonstrating that the 'excellent' rating would be achieved prior to the fit out of the commercial premises. The applicant is in agreement with this approach.

### **Ecology**

494. An Ecological Assessment Report has been submitted as part of the application documents, which has been reviewed by the councils' ecology officer. The submitted report refers to the ecological assessment that took place, which consisted of a desk study, habitat survey and a bat survey. The purpose of the assessment was to identify any ecological mitigation or enhancement measures.
495. No on site buildings or trees offered suitability to support roosting bats. Overall, the assessment found that the site is considered to be of negligible value for nature conservation. The replacement scheme offers an opportunity to enhance the biodiversity value of the site and a series of ecological enhancements are proposed including the creation of living roofs and provision of bat and bird boxes. The landscaping would also deliver the linear park route and provide new opportunities for tree planting. Opportunities for community engagement could be created through provision of ecological information boards and community bee hives.
496. The ecology officer welcomes the ecological enhancements and suggests that insect walls and native planting could also be included and overall recommends conditions be attached to secure the features, all of which have been included in the recommendation.
497. The Northfield House Community Wildlife Garden has been designated as a Site of Importance for Nature Conservation. The garden should continue to thrive with the development in place; there would be no overshadowing impacts since the proposed development is located to the north-west of the garden, rather than to its south.

### **Air Quality**

498. The impacts of the scheme on air quality have been assessed as part of the ES. The site lies in an Air Quality Management Area. The impacts during the demolition and construction phases of the scheme have been addressed and were considered not to

be significant when appropriate mitigation measures are applied through a dust management plan which can be requested by condition to form part of the demolition and construction management plan.

### **Contamination**

499. The ES includes a section on the ground conditions and contamination of the site. As the site is located on brownfield industrial land, it is considered to have moderate potential for contamination to be present. The ES recommends that mitigation be included such as the carrying out of detailed ground investigation work with any contaminants found to be removed and the land remediated. It is therefore recommended that conditions be attached to the recommendation requiring these works to be carried out.

### **Water resources and flood risk**

500. A Flood Risk Assessment (FRA) has been provided, which confirms that the site is within Flood Zone 3 and is protected by flood defences and as a result, has low risk of tidal or fluvial flooding and low risk of surface and ground water flooding. The Environment Agency has reviewed the FRA and considers the scheme to be acceptable, subject to the imposition of conditions. These conditions are included on the draft decision notice.
501. The council's flood and drainage team have also reviewed the submitted material and Drainage Strategy. The flood team have requested that a full, detailed drainage strategy is requested by condition as their submitted strategy is in preliminary form. In the event that the proposed development cannot achieve greenfield run off rates, a financial contribution would be collected at £366 per cubic metre.

### **Archaeology**

502. This large site is partially within and lies adjacent to the 'Bermondsey Lake' Archaeological Priority Zone (APZ) and may have important archaeological remains which should be appropriately managed.
503. The applicant has completed an archaeological Desk Based Assessment (DBA) by Cotswold Archaeology and dated July 2017 and also a programme of archaeological watching brief works on geotechnical investigations. These works accurately note that the archaeology of the area comprises prehistoric remains (including Mesolithic and Neolithic flint tools), Romano-British finds associated with the Roman road which ran along the line of Old Kent Road, evidence for medieval settlement and agricultural activity and post-medieval and 19th century features, including the Grand Surrey Canal.
504. The DBA and watching brief works do determine, as far as is reasonably possible, the location, extent, date, character, condition, significance and quality of any surviving archaeological remains liable to be threatened by the proposed redevelopment. The assessment also determines the significance and value of the built heritage assets and makes recommendations for their appropriate mitigation. The desk based assessment shows that there are areas of the site where archaeological remains may still survive.
505. The council's archaeology officer has reviewed the submitted documents and recommendations a series of conditions in relation to archaeological evaluation, mitigation, building recording and foundation design. These conditions have been included on the draft decision notice.

## **Wind**

506. Chapter 16 of the ES includes an assessment of the impacts of the scheme on the local pedestrian wind microclimate. The assessment also includes the cumulative impact of the committed schemes such as Nye's Wharf, Cantium Retail Park and Glengall Road.
507. A total of 77 study point locations were used for measuring the wind speed within and around the Application Site using a wind tunnel assessment. The study point locations comprised:
- A total of 66 study points along the outdoor trafficable areas on the ground level within the boundary of the Application Site.
  - A total of 11 study points along the outdoor ground level trafficable areas further away from the Application Site.
508. The results of the study indicate that ameliorative treatments are required at the various ground level thoroughfares and outdoor amenity areas in order to achieve the desired wind speed criteria for pedestrian comfort.
509. Based on the results observed from the wind tunnel testing, the list of recommended mitigation measures recommended are summarised as follows:
1. Retention of proposed planting of 5–8 metre high evergreen trees with interlocking canopies where possible.
  2. Retention of 2.4 metre high wall along the north-western edge of the site boundary.
  3. Retention of 2.4 metre high wall extending from the north-west corner of Block 10 to the western edge of the site boundary.
  4. Inclusion of 2.4 metre high wall extending from the northern edge of the site boundary of Blocks 1 and 2.
  5. Inclusion of two 5–8 metre high evergreen trees with interlocking canopies at the south-eastern corner of Block 6 to the site boundary.
  6. Inclusion of 1.5 metre high evergreen shrubs with at the western edge of Block 11.
510. It is therefore found that based on the additional mitigation which can be secured by condition, the effects of the development on the local wind microclimate are acceptable.

## **Health impact assessment**

511. The applicant has submitted a Health Impact Assessment with the application. In summary, the assessment has found the proposed development to have a positive health impact because of the inclusion of affordable housing, the high quality design, tenure blind design, . It also recognises that CIL contributions would be made towards new or improved health facilities. Whilst there would be some impacts arising from construction work for a period of 8 years (from 2019-2027 approx), good construction management would help to minimise these impacts and accordingly a construction management plan would be secured in line with the council's normal practice.

## **Socio-economic impacts**

512. An assessment has been made of the social and economic effects of the proposed scheme. This has considered the extent to which the scheme impacts on employment, population, the local community and social and community infrastructure.
513. According to the Government's Indices of Multiple Deprivation, the site is located within a deprived area. Data shows the ward, within which the site is located, has a larger working age population, a higher proportion of residents of BME ethnic origin, higher levels of JSA (Job Seekers Allowance) claimants, higher proportions of those with no qualifications, higher than average child poverty and significantly low levels of owner occupation. At present the employment on the site is operating at very low employment densities providing a maximum of circa 63 jobs. There is currently no housing provision on the site.
514. The main socio-economic impacts arising from the proposed scheme is the provision of significant new levels of employment. The proposed scheme itself could accommodate up to 392 jobs and up to 1,300 new homes. The proposed development is expected to have a moderate beneficial influence in contributing to much needed housing in Southwark. The provision of 40% affordable housing is also likely to make much needed contribution to affordable housing in an area where housing is priced much higher than average earnings.
515. Overall, the main socio-economic impacts arising as a result of the proposed scheme once mitigation has been taken into account are either beneficial or negligible. Key impacts include; a moderate beneficial effect in relation to demolition and construction employment, benefit from minor to moderate beneficial effect from increased amenity and services, better access to affordable housing, reduced crime rates, a moderately beneficial impact through provision of public areas and a mix of uses and improved access to the public linear park and existing open space surrounding the site. There should also be a moderate beneficial effect in relation to job creation, which would offer increased local opportunities to local residents.

## **Fire safety**

516. The applicant has submitted a fire safety strategy with the application.
517. The fire strategy is based upon Approved Document B guidance (2006 edition incorporating 2007, 2010, 2013 and 2018 amendments) for compliance with the functional requirements of Building Regulations 2010, including the recent 2018 amendment regarding façade construction. For open plan flat design additional guidance is sought from BS 9991:2015;
518. The key elements of the fire strategy are:
- All apartments will be provided with a domestic sprinkler system in accordance with BS 9251:2014;
  - The apartments will be provided with automatic fire detection in accordance with BS 5839-6. Detection will be provided in the residential corridors to activate the smoke ventilation systems in the corridors and stairs;
  - The office, retail and commercial areas would be provided with a fire alarm and detection system in accordance with BS 5839-1;
  - The residential corridors will be provided with mechanical smoke extract

shafts. Where extended corridor travel distances are present the system will be designed to achieve the requirements of the Smoke Control Association Guidance on *Smoke Control to Common Escape Routes in Apartment Buildings*, and validated with CFD smoke modelling;

- The car park will be provided with a smoke ventilation system;
- The load bearing elements of structure in the buildings will be provided to 90 minutes or 120 minutes fire resistance depending upon the height of the block;
- The residential apartments will be separated from adjacent apartments and common corridors with 60 minutes fire resisting construction;
- Residential elements of the buildings will be fire compartmented from retail, commercial and car park areas with 120 minutes fire resisting construction;
- As per the latest Building Regulations 2018 amendment the external facade materials will all be non-combustible or of limited combustibility;
- A fire fighting shaft will be provided for each block including stair core, AOV at the head of the stair, dry riser (wet risers will be provided buildings over 50m) and fire fighting lift.
- In addition, a condition would require all the commercial units below residential to be sprinkled.

519. It is considered that with the fire safety provisions outlines in the fire safety strategy and summarised above the functional provisions of the Building Regulations would be achieved.

#### **Aviation**

520. The National Air Traffic Safeguarding Office (NATS) have reviewed the proposed development and from a technical safeguarding aspect and have stated that it does not conflict with their safeguarding criteria. Accordingly, they have no objections to the proposal.

#### **TV and radio signals**

521. A desktop study has been undertaken to assess the possible effects and impacts on the reception of television and radio broadcast services from the proposed development. The assessment concludes that no adverse impacts have been identified on either television or radio broadcast platforms. As no interference is anticipated, no mitigation measures are required.

#### **Other matters**

522. None.

#### **Statement of Community Involvement**

523. Consultation was carried out by the applicant prior to the submission of the planning application. The consultation undertaken was carried out with the local community and key stakeholders from the area which included:

- March 2016 and July 2016 site tours
- Two displays at the Borough, Bankside and London Bridge Community Council (x2) and a stall and presentation at the Nunhead Community Council.
- 2 public exhibitions; one held on 20 April 2016 at the Unwin & Friary TRA hall and 21 April 2016 at the Links community centre between 2pm and 8pm.

- Attendance at Unwin & Friary Estate and Northfield House TRAs (Feb 2016, September 2106 & January 2019);
- Meeting with the neighbouring user, Space Studios;
- Provided a dedicated project website;
- Presentation to the Northfield House TRA (20 July 2016 & December 2018).
- Attendance at Glengall Road Residents Meeting (November 2018).

524. A number of themes emerged as a result from the feedback which has been detailed in the Statement of Community Involvement submitted which outlines some of the concerns from the residents regarding the proposed development. These are:

- Some residents were concerned about the loss of employment floor space and associated jobs as a result of this development.
- Some residents raised height as an issue, particularly in relation to the impacts of the neighbouring properties (such as overshadowing) but also raised that good quality design and architecture would be a key priority. Preference was expressed for a scheme that reflects on the character of the area.
- Residents wanted to see more affordable housing being proposed.
- There were questions around subsidence and structural damage to surrounding buildings.
- Impacts arising from construction such as noise.
- Throughout the consultation undertaken, there was clear support for public amenity space and improved pedestrian links through the site. Residents wanted to ensure that the proposed development would not result in adverse pressure on the local transport infrastructure and generally to discourage reliance on cars.

### **Community impact statement / Equalities Assessment**

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

a) The need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act

b) The need to advance equality of opportunity between persons sharing a relevant protected characteristic and persons who do not share it. This involves having due regard to the need to:

- Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
- Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it
- Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low

c) The need to foster good relations between persons who share a relevant protected characteristic and those who do not share it. This involves having due regard, in particular, to the need to tackle prejudice and promote understanding.

526. The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership.

527. The Council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights.
528. The Council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application. It is not considered that this proposal would give rise to any equalities issues in respect of persons sharing the relevant characteristics set out above.

### **Conclusion on planning issues**

529. The major redevelopment of the site is supported and welcomed in principle. The principle of housing on the site is also accepted, and would be in line with policy aspirations to increase the number of new homes in the area.
530. The provision of specifically designed B1c light industrial floorspace is welcomed and would be capable of forming a successful employment cluster with the adjoining Space Studios building.
531. In advance of the Old Kent Road being an adopted town centre, the quantum of town centre uses including retail, offices and leisure/community uses fully accords with the sequential approach to development and therefore can be supported.
532. The proposed mix of uses would add to the vibrancy of the area which is complemented by the substantial public realm improvements including the Linear Park delivery and the creation of new routes which would significantly improve permeability and connectivity in the area – both east-west and north-south.
533. The scheme would deliver the following major regeneration benefits:
- Up to 1300 new homes to the borough's housing stock;
  - 40% affordable housing overall;
  - 400 units in the first Detailed Component phase;
  - Up to 520 affordable units overall;
  - The re-provision of B1(c) light industrial floorspace;
  - 10% affordable B1(c) light industrial floorspace;
  - The provision of independent retail in Building B6;
  - Up to 392 new full time equivalent employment positions, an uplift of up to 329 jobs;
  - The substantial contribution to the Linear Park and a new urban square;
  - A significant uplift in the number of trees; and
  - Improved connectivity for cyclists and pedestrians through new east-west and north-south connections.
534. The proposal would deliver a very high standard of accommodation, which would comply with the majority of the standards and principles of exemplary residential design, as set out in Southwark's residential design standards SPD. The scheme would include a majority of dual aspect units of 63.3% which is considered very good taking into account the high density of the scheme. Whilst there would be many units that would not have any form of private amenity space within Building B4 (44 storeys), this is balanced against the provision of a substantial amount of ground floor public realm which includes the Linear Park and Central Square.
535. The proportion of car parking spaces has been noted to be a disappointing aspect of

the proposal, but officers consider that sufficient mitigation has been included which includes 40% electric vehicle charging points.

536. The impacts of the scheme in relation to daylight and sunlight, are on balance considered acceptable, and whilst there would be departures from the BRE guidelines, the daylight and sunlight levels are still considered adequate for a dense urban area.
537. Overall, the major regeneration benefits of the proposal are considered to outweigh the harm to the setting of the conservation areas, the daylight losses to some of the surrounding residential properties, the lack of private amenity spaces to flats within Building B4 and the proportion of car parking spaces included.
538. It is therefore recommended that planning permission be granted subject to conditions, referral to the Mayor of London, referral to the Secretary of State and the completion of a Section 106 Legal Agreement under the terms as set out above.

### **Consultations**

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

### **Consultation replies**

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

### Summary of consultation responses

#### **Initial consultation:**

541. 63 representations were received, 60 in objection and 3 in support. The 60 objections were received on the following grounds, as summarised by the table below.

Table: Objections – initial consultation

<b>Objection</b>	<b>Officer response</b>
Lack of affordable housing. Southwark's policy requires 35% and Berkeley Homes are proposing just 25%. Also, note the Mayor's target is actually 50%.	The objection was received at a time when the applicant's affordable housing offer was 25%. This has now increased to 40%.
Object to principle of the development which introduces mass residential accommodation with associated small localised social use areas in what is an established and preferred industrial/business location.	Emerging policy proposes the release of the preferred industrial location, and this has been agreed with the Greater London Authority.
Building height. The proposals for a 40 storey tower and the other tall buildings are not appropriate. It is out of scale and will be poorly utilised.	The acceptability of the tall buildings has been discussed in the main body of the report at paragraphs 198-219 and has been found to be acceptable and would be in compliance with the draft OKR AAP as well as adopted planning policy,

	being located in a London Plan opportunity area in a London Plan transport and growth corridor at a point of landmark significance and making a very positive contribution to the landscape.
Character of the area. The proposal does not reflect the character of the area nor does it reflect Old Kent Road. The landscaping is soulless and corporate and does not reflect the immediate contextual landscape that makes this area special and unique.	The design of the Linear Park landscape would reference the materiality of the Surrey Canal and the former wharves and warehouses with the use of industrial, working materials such as weathered steel, hefty timber, cobbles and brick paving.
Impact upon Glengall Road Conservation Area and the listed buildings.	This is discussed in the main body of the report and has been found acceptable.
The scheme would adversely affect historic views across London towards the Thames and Westminster.	This is discussed in paragraph 285 and has been found acceptable.
The New Southwark Plan and the Old Kent Road AAP exist in draft report only.	The scheme has been primarily assessed against the adopted policies of the adopted London Plan, Southwark Plan and Core Strategy. Where the New Southwark Plan and draft OKR AAP have been referred to, they have been acknowledged as having emerging weight.
The commercial units are dressed in glass and suggest an environment for offices rather than industrial spaces	Specifically designed B1(c) floorspace has been included in the scheme, namely the lower floors of Detailed Building B10 and the Outline Building B11.
Existing businesses in the Old Kent Road area should be accommodated within the redevelopment	There is potential for this to happen as the B1c floorspace can be offered to existing businesses first, secured by the legal agreement.
Impact on Northfield House gardens. There are three gardens that have been recognised as a Site for Importance for Nature Conservation and have a wild feel that is loved by the community.	The garden should continue to thrive with the development in place; there would be no overshadowing impacts since the proposed development is located to the north of the garden, rather than to its south.
Lack of consultation. Berkeley have not carried out meaningful consultation with the public. Public exhibitions have been held a long time ago and did not reflect	Berkeley Homes have carried out additional consultation as follows: <ul style="list-style-type: none"> <li>Meeting with Glengall Road residents in December 2018;</li> </ul>

the true application, also some events have been listed that did not take place. It seems to be seen as a box ticking exercise rather than genuine consultation.	<ul style="list-style-type: none"> <li>• Meeting the Northfield House Tenants and Residents Association in December 2018;</li> <li>• Meeting with the Friary and Unwin Tenants and Residents Association in January 2019; and</li> <li>• Meeting the Friends of Burgess Park in February 2019.</li> </ul>
The sheer volume of material that has been uploaded is overwhelming for members of the public to break down and understand.	This is noted and is because the applicant has submitted two revisions to the original scheme.
The Mayor's Good Growth agenda should be applied to guide development on the Old Kent Road.	The proposed development would benefit the existing community and as well as the new residents through the delivery of 40% affordable housing, new local shops and services and the provision of a substantial new park space.
These developments come at the expense of local businesses.	All of the existing businesses on the site are on short term leases and have no expectation to stay on the site.
Impact on transport conditions including pressure for car parking.	Occupiers of the proposed development would not be entitled to obtain a car parking permit in any future Controlled Parking Zone. Bus stops are located close by on the Old Kent Road and Peckham Park Road. The BLE is expected to be delivered by 2029/2030.
Concerned about the car parking.	This is noted. As mitigation, the applicant is proposing 40% electric vehicle charging points.
Impact on local services.	The proposed development would be subject to a Community Infrastructure Levy tax charge, which could be used to support additional education and health services.
Impact on Space Studios.	There would be some impacts to Space Studios in relation to loss of daylight, mainly because many of the windows do have an unrestricted outlook.
Fire safety post Grenfell – the B4 tower only shows one staircase.	A Fire Safety Statement has been submitted with the application, and the applicants consultants consider the development would achieve a high standard of safety for occupants

Loss of small businesses.	All of the existing businesses on the site are on short term leases and have no expectation to stay on the site.
The integration of local community and local businesses has not been considered enough.	The proposed development would benefit the existing community and as well as the new residents through the delivery of 40% affordable housing, new local shops and services and the provision of a substantial new park space.  B1c light industrial floorspace would be provided and this would be offered to existing businesses first through the S.106 legal agreement.
Impact on environmental conditions such as wind.	Based on the additional mitigation which can be secured by condition, the effects of the development on the local wind microclimate are considered acceptable.
Loss of sky view.	The proposed buildings would clearly be visible in the skyline. The Townscape Analysis has been discussed in the main body of the report, starting at paragraph 285.
Overshadowing impacts from the tall buildings.	The overshadowing impacts have been discussed at paragraphs 415-420.
Loss of sunlight.	The impacts on sunlight have been discussed at paragraphs 415-420.
Resident of Ednam House (Friary Estate) is concerned about the faults and problems occurring within the building.	This is not relevant to the consideration of the proposed scheme.
Impact during construction.	Demolition and construction management plans can be requested by condition and would ensure best practice procedures to mitigate construction noise as far as possible.
The scheme viability information should be made public and transparent.	Full viability information will be made public one week before consideration of the scheme at the council's Planning Committee.
The social sustainability document does not address the current uses and features in the area, choosing to only	The other submitted documents, such as the Design and Access Statement and the Environmental Statement

focus on the development and the suggestion that the 'wind tunnel' linear park will enhance living conditions and amenity for current residents.	contain information on the surrounding area that adjoins the site.
The development disregards current cultural and artistic amenity in the design. If the history of the area is so important why aren't they retaining the old chimney?	The chimney would be retained, and a planning condition has been included on the draft decision notice to ensure this.
24 hour concierge' suggests that 'gated' residences would be developed.	There is no gated community proposed here, the public realm and linear park would have full public access.
The development is not located at a major transport node as the Bakerloo Line Extension does not currently exist.	Whilst the Bakerloo Line Extension does not currently exist on the Old Kent Road, opening is planned for around 2029/30.
Loss of jobs.	There would be a substantial increase of jobs at the site, from 63 existing, to up to 392 jobs.
Query as to whether any bat surveys been undertaken.	A bat survey was undertaken and no on site buildings or trees offered suitability to support roosting bats.
This development plan is confusing due to the fact that in some of the plans and images in the Design and Access Statement include land which is not actually part of the land being developed.	This is acknowledging how the proposed development would sit in the surrounding context.

542. 3 letters of support were received on the initial consultation, which are summarised in the table below.

<b>Support</b>	<b>Officer response</b>
Support the redevelopment and the improvements of the surrounding area but do require that a high standard of design is achieved.	Noted. Detailed design conditions have been included on the draft decision notice.
Will bring a much needed revival to an forgotten and neglected area of SE London. As long as the development is a balanced mix of affordable homes and community projects, it is fully supported.	Noted. The development includes 40% affordable housing and includes projects offered to the local community such as the astro-turf to the Leyton Square games court and the training programme to get people IT ready.

### Statutory and non statutory responses

543. Southwark Law Centre: Writing on behalf of the Old Kent Road business community and the business association VitalOKR, we object to the development for two main reasons. First the application is premature in the sense outlined in the National Planning Policy Framework (“NPPF”) and Planning Practice Guidance (“PPG”). Secondly, granting planning permission in line with the proposal would prejudice the ability of Southwark Council to consult properly on future draft and submission versions of the Old Kent Road Area Action Plan (“OKR AAP”), as certain aspects of the OKR AAP would be predetermined by the proposed development and therefore consultation could not take place at a formative stage.
544. Prematurity  
This application should be refused on grounds of prematurity for three main reasons: first, the scale and impact of the proposed development; secondly, consultees’ reactions to draft of policies on industrial land release in the draft New Southwark Plan and thirdly, the fact that present situation is slightly different (and more problematic) than that envisaged in the section of the PPG dealing with prematurity.
545. First, the proposed development is so substantial that to grant planning permission would undermine the plan-making process by pre-determining decisions about scale, location or phasing of new development. It would involve the release of over half of the vacant industrial land in the OKR Opportunity Area, including a significant portion of the designated Strategic Industrial Land in the Borough.
546. Second, the potential loss of industrial land is one of the more controversial aspects of the draft OKR AAP. The objections that have been raised to the relevant policies in the draft OKR AAP are by no means resolved, meaning that lesser weight should be placed on these emerging policies, in contrast with the weight to be placed on policies in the development plan that is currently in force in Southwark.
547. Lastly, Planning Practice Guidance indicates that prematurity will rarely justify the refusal to grant planning permission where a draft development plan document has not been submitted for examination. Notwithstanding the fact that the OKR AAP has not yet reached submission stage, planning permission for the proposed development should nonetheless be refused on grounds of prematurity.
548. Pre-empting the consultation process  
Deciding this application now would pre-empt the democratic plan-making process for the OKR AAP. The scale and size of the proposed development, and the fact that it would require the release of a significant portion of the Borough’s strategic industrial land, mean that granting planning permission would limit significantly the ability of Southwark Council to modify policies and site allocations in the OKR AAP in response to consultation. Effectively, certain aspects of the consultation proposals on industrial land, tall buildings and housing will no longer be at a formative stage, since they will have already been decided in this application.
549. For the reasons the application should be refused.
550. Officer Response: Emerging policy proposes the release of the preferred industrial location, and this has been agreed with the Greater London Authority. Issues around prematurity have been discussed in the main body of the report. In summary, legal advice was obtained on this issue and it was found that it would not be considered premature.

551. Environment Agency: No objections subject to the attachment of conditions.
552. Officer Response: Noted, these have been attached to the draft decision notice.

Local groups

553. Space Studios: Object. Two responses received as follows. The first response received was a holding response informing us they have commissioned some a daylight consultant to consider the impact of the scheme and the second response is a letter containing daylight information.
1. Space Studios is very concerned about this application and have resolved that it wishes to object. The detail of our objection will be addressed in technical reports which have been commissioned.
  2. It is evident from the Anstey Horne analysis that significant changes in light are expected at 90 Haymerle Road and this will negatively affect the majority of occupants. Upon implementation of the proposal 70% of the windows serving the studios will experience a noticeable change in daylight (VSC) by reference to the BRE guide. The retained VSC values of these windows will fall on average to 10-15% in comparison to the existing level of 30-35%. This illustrates that of the elevations that face the site, the majority of windows will experience a change in daylight (VSC) of more than 50%. Nearly half of the studios assessed will experience a reduction in daylight distribution of 45 – 80%. This is considered to be a noticeable loss of light (BRE 2.2.9) to the studios.
554. Officer Response: This is discussed at paragraphs 404-408. In summary, it is noted there would be a reduction in daylight but this is not considered to be so significant to warrant refusal, especially when taking into account the commercial (rather than residential) use of the building.
555. Northfield House Tenants and Residents Association (NHTRA): Object for the following reasons:
- 1) Affordability - Southwark's planning policy requires 35% affordable housing in new development's such as this. Berkeley Homes are only proposing 25% with the submission of a separate financial viability assessment that has not been made public as part of this application.
  - 2) Character - This proposal does not reflect the character of the area. The landscaping in particular is soulless and corporate and does not reflect the immediate contextual landscape that makes this area special and unique.
  - 3) Consultation process - Berkeley Homes have not carried out a meaningful consultation with members of the public. Berkeley have consulted with NHTRA on two occasions and at the last public consultation in September 2016 they promised to share their more developed proposals before they were submitted for planning. However this has not happened and they have now asked to meet with us just days following the closure of comments on this planning application.
556. The sheer volume of information that has been uploaded to the planning portal is overwhelming for members of the public to break down and truly understand what has been proposed and how this might impact on them.
557. Officer Response: 40% affordable housing is now proposed. The applicant has submitted two revisions to the original scheme, which is why there are many documents appearing on the website.

558. Councillor Livingstone: As a local councillor for Livesey ward, I am writing to object to this planning application given that it fails to meet the council's policy on levels of affordable housing. The application proposes only to deliver 25% affordable housing, and only 12.5% social housing. These levels are considerably below the minimums set out in council policy and the shortfall will have a significant impact in failing to meet local housing demand for truly affordable housing.
559. Officer Response: This has been increased to 40%.
560. Transport for London: Comments made as follows:
- Malt Street: This narrow corridor is proposed to be a 'cycle street' but seems a little narrow. Clarification of the available width would be welcomed. Block B12 appears to be hard up against the defined carriageway area which, given that this route will need to accommodate refuse vehicles, emergency services and delivery vehicles, appears to provide insufficient protection for the building and its users.
561. Surrey Canal route: The proposed development responds to the aspiration in the draft AAP to reinstate the Surrey Canal Route as a linear park and route which runs through the heart of the site, which is welcomed. The cycling route through the centre of the site is welcomed as an important, direct cycle connection between Burgess Park and Old Kent Road and beyond. The Applicant should demonstrate that there is not a risk of conflict between pedestrians and cyclists.
562. Cycling: There is scope for significant improvement on the route to South Bermondsey Station and beyond to Greenland Dock, and we request funding for a study into, and contribution toward implementation of, cycling infrastructure improvements on this route within the Old Kent Road Opportunity Area.
563. Also request funding for a study into, and contribution toward implementation of cycling infrastructure improvements on the route from New Bermondsey Station on Surrey Quays Road to join Quietway 1.
564. Cycle parking: Lift access to the basement cycle area in Block B9 should be provided. A good proportion of standard "Sheffield racks" should be provided. The aisle widths between the stacking racks does not seem adequate. Access to cycle areas should be improved. The quantum of visitor level cycle parking for visitors seems inadequate. Also require the safeguarding of land for a 30 dock cycle station and funding of £220,000 toward the capital (£110,000) and operational costs (£110,000) of the docking station.
565. Car parking: We welcome the proposal of a low-car development with a ratio of 0.12 parking spaces per residential unit, given the relatively accessible nature of the site. While policy compliant, given the rapid increase in sales of electric vehicles over the last few years we would encourage the provision of electric vehicle charging points at a much higher proportion of spaces than are proposed.
566. In regards to parking provision for disabled residents and visitors, we cannot endorse the very low level proposed. A total of seven parking places are proposed to be reserved for Blue Badge holders.
567. The proposed Car Park Management Plan (CPMP) should include a methodology for determining the demand for disabled parking and ensuring that it is met including if necessary by converting conventional parking spaces to accessible spaces.

568. Trip generation, mode split, distribution and assignment: This analysis is very poorly set out and mode split seems to be based on the 2011 Census for Southwark as a whole and is therefore not representative of this site. Given the relatively low service frequency from South Bermondsey and Queens Road Peckham, it is more likely that residents will take a bus to Elephant & Castle to access the much more frequent Bakerloo Line, Northern Line and National Rail services there. It can be expected that the majority of bus trips would be attracted to the northbound "Malt Street" stop.
569. Buses: A request for contributions towards delivering additional bus capacity is made.
570. Bakerloo Line Extension tunnels: : To avoid conflict, we request that TfL is consulted formally on the location and nature of any foundations greater than 15m below the current ground level, secured by condition or obligation as appropriate. In addition it is possible that a station or other works may be located nearby and accordingly we would suggest that suitable noise and associated mitigation measures are incorporated into the detailed design of the development and secured by condition.
571. Deliveries and servicing: The submitted plan it is not clear where the proposed loading bays are. Their location should be clarified so that the interaction with pedestrians and cyclists and upon the public realm can be considered. Morning and evening peak periods for deliveries should be avoided.
572. Officer Response: These comments are discussed at paragraphs 433-471.
573. Thames Water: Thames Water has identified an inability of the existing waste water infrastructure to accommodate the needs of this application. Recommend that a condition be attached requiring a drainage strategy to be submitted.
574. Officer Response: This has been included on the draft decision notice.
575. Natural England: Natural England advises the Council that the proposal is unlikely to affect any statutorily protected sites or landscapes.
576. Officer Response: Noted.
577. Metropolitan Police Service: The development should be able to achieve Secured by Design accreditation in respect of physical security with the guidance of Secured by Design Commercial Developments 2015 and Secured by Design Homes 2016. Recommend that a "Secured by Design" condition is attached.
578. Officer Response: This has been included on the draft decision notice.
579. Design Review Panel: The October 2018 scheme was presented to the council's Design Review Panel. The following comments were made:
580. The Linear Park: The Panel endorsed the concept of the Linear park and were encouraged that the design principles established on this site had followed through into the design of the public spaces on neighbouring plots and sites.
581. The Panel felt the public realm was dominated by hardscape and was not 'green' enough. They challenged the designers to maximise the number of trees and truly green spaces in the linear park. They also encouraged the greater use of water and SUDS in the landscape and to develop the industrial character of the canal route into the plans.

582. They raised concerns about the impact that the Space Studios Yard would have on the Linear Park. At this western entrance to the Linear Park the Space Studios Yard, with its high wall, interrupts the Linear Park and severely constrains access to it from the west and Burgess Park. The Panel encouraged the Applicants to continue their dialogue with Space Studios and to try to resolve this issue to ensure that the Linear Park is successful in its principle aim to enable east-west permeability across the area.
583. The Panel questioned the need for a cycle route along the length of the Linear Park and queried whether the cycle route could be directed elsewhere to ensure the Linear Park remains a primary landscaped place.
584. Land use: The Panel raised a concern about the limited extent and variety of uses proposed at the ground floor. The Panel encouraged the Applicants to maximise the commercial uses on the ground floor (including the provision of affordable business space) especially on the east-west route along the edge of the Linear Park as well as the north-south link from the Square to the Old Kent Road and especially along the Malt Street frontage.
585. Block B9: At over 10-storeys tall and as a large footprint residential block, the Panel felt this building dominates and overshadows the public space to the detriment of the public space. The Panel challenged the Applicants to reconsider the scale and nature of this building because of its importance to the site and its effect on the public space. They felt it should be reduced in size to 3 or 4 storeys (max).
586. Quality of design: the Panel generally acknowledged that the application held some promise and recommended that subsequent phases should return to the DRP as each plot comes up as a 'Reserved Matters' application.
587. Conclusion: In conclusion the Panel generally endorsed the masterplanning of this proposal. Whilst they expressed their concern that it had been presented to them too late to have a meaningful influence on the design they expressed their confidence in the capabilities of the architects/masterplanners to deliver a high quality design. They requested changes to the design of the Linear Park, the distribution of land-uses and the design of Block B9 which they would like to see in the amended proposal due to be submitted to the council shortly.
588. Officer Response: These comments have been discussed above at paragraphs 249-267.
589. Historic England: This Townscape Assessment study demonstrates that the proposed masterplan would result in a major change to the surrounding townscape, which we consider would have a harmful impact on the setting of a multitude of heritage assets, particularly those in the local vicinity.
590. Cobourg Road Conservation Area: The wireline assessment demonstrates that the proposed masterplan development would rise substantially above the existing tree and roofline resulting in a dominant intrusion on the skyline. This, in our opinion, would undermine the attractive and picturesque qualities of the conservation area in views from Burgess Park, and therefore cause harm to the character of the Conservation Area, and to the setting of the Grade II listed townhouses in this particular view.
591. Glengall Road Conservation Area: The wireline and rendered visuals provided reveal that the proposed masterplan, and particularly the tower subject to detailed planning permission, would break the unobstructed roofline at the corner of Glengall Road and

Glengall Terrace which would detract from the historic streetscape. We conclude that this impact would constitute harm to both the character of the Conservation Area and the setting of these Grade II listed houses.

592. Caroline Gardens Conservation Area: We consider that this scheme would detract from the formal orthogonal plan and enclosed setting of Caroline Gardens, and therefore cause harm to the character of the Conservation Area and the setting of the Grade II listed almshouse buildings.
593. Distant Heritage Assets: As we recommended, views of the proposed development from the Grade II\* listed Nunhead Cemetery have been provided (VP16, p42-43). The study indicates that the proposed development would be well screened by trees, and it therefore appears unlikely that there would be a significant impact on the setting of the Cemetery and its visual relationship with St Paul's Cathedral.
594. Despite our recommendation at scoping stage, it does not appear that any assessment of the LVMF views from Parliament Hill and Kenwood House towards Central London (LVMF Views 2 and 3) have been provided. Although the development site is some distance away, we continue to recommend that a basic wireline assessment is undertaken to identify whether there would be any significant visibility from these designated strategic views.
595. Conclusion: Conclude that the proposed development would cause a significant amount of harm to the conservation areas and listed buildings set out in this letter. Whilst we do not consider the level of harm to any individual designated heritage asset to be 'substantial' in NPPF terms, the cumulative impact of the development on the wide range of designations in the vicinity is of much concern to Historic England.
596. Regarding the proposed tower, the supporting visual information indicates that it would appear relatively isolated in a number of key views, and would therefore not appear to form a coherent part of the proposed masterplan development. It is important to note that in all three views in which we have identified harm, the impact of the proposed masterplan development represents a significant departure from the more modest scale of the Old Kent Road Local Development Study massing (outlined in green). This apparent lack of a coherent masterplan, and departure from the emerging strategy, is of much concern to us. In our view, this scheme fails to preserve both the setting of the listed buildings and the character of the conservation areas identified in this letter, and we therefore recommend that this application is refused.
597. Officer Response: Historic England's comments have been discussed above at paragraphs 285-292.

### **Second consultation**

598. A second round of re-consultation was carried out following the October 2018 revisions to the scheme. 13 representations were received, all in objection and as summarised by the table below.

**Table: Objections – second consultation**

<b>Objection</b>	<b>Officer response</b>
Prematurity – the scheme not in line with current planning policy and could detrimentally influence the outcome of	The scheme is not considered to be premature, this is discussed in the main body of the report at paragraphs 143-

the new Southwark Plan by setting dangerous precedents on heights, densities, and land use.	145.
Building height – object to the ridiculous scale of the tall buildings.	The acceptability of the tall buildings has been discussed in paragraphs 198-219 and has been found to be acceptable and would be in compliance with adopted planning policy, being located in a London Plan opportunity area in a London Plan transport and growth corridor at a point of landmark significance and making a very positive contribution to the landscape.
The Glengall Road conservation area would be overshadowed, and the development will negatively alter the views out of Burgess Park.	The extent of any overshadowing to gardens within the Glengall Road Conservation Area would be limited to between 0800-0900 hours on 21 <sup>st</sup> March hours.
Overshadowing to nearby homes.	The overshadowing analysis has been carried out, the results of which has been discussed above at paragraph 415-420.
Housing – the housing does not meet local need.	The proposed development would include 40% affordable housing, exceeding the minimum 35% target.
The affordable housing provision should be increased to 50%, or even 100%.	The proposed development would include 40% affordable housing, exceeding the minimum 35% target. Viability information submitted shows this is more than the development can support and it would be reliant on achieving higher sales values.
No benefit to the existing community.	The proposed development would include the significant delivery of a new park, including 40% affordable housing. Local projects to the local community would also be secured, as described in paragraph 476-478.
The consultation process for this development is taking place out of synch with the consultation process for the wider Old Kent Road Area Action Plan, throwing the honesty of the latter process into question.	The application has been determined in accordance with the adopted development plan, consisting of the saved Southwark Plan, the Southwark Core Strategy and the adopted London Plan. Where the OKR AAP, the New Southwark Plan and the draft London

	Plan has been referred to in the main report, it has been referred to as a draft document.
Loss of light to Space Studios.	There would be a loss of daylight to Space Studios; this is discussed at paragraphs 404-408.
Impact on 24 hour access to the courtyard of Space Studios.	The 24 hour access would be maintained as the development would not impact on the servicing of Space Studios.
Given Grenfell, why are high rise buildings being considered.	A Fire Safety Statement has been submitted with the application, and the applicants consultants consider the development would achieve a high standard of safety for occupants.
The 129 residential car parking spaces is a concern given planning policies require zero car parking.	This is accepted. As mitigation, the applicant has proposed 40% electric vehicle charging points.
Increase in poor air quality from increased traffic.	Demolition and construction management plans would be secured by condition and electric vehicle charging points would be included. The proposed development would be close to sustainable means of travel such as buses as well as the future Bakerloo Line Extension.
Construction/damage to Glengall Road properties which suffer subsidence.	Demolition and construction management plans can be requested by condition and would ensure best practice procedures to mitigate these impacts as far as possible.

599. Greater London Authority: That Southwark Council be advised the application does not fully comply with the London Plan and draft London Plan. However, the resolution of these issues could lead to the application becoming compliant with the London Plan and draft London Plan. The strategic issues summary is as follows
600. Principle of development: The principle of a high density mixed use development within the Old Kent Road Opportunity Area, which re-provides the site's existing industrial floorspace, is supported, and the mix of uses is in general accordance with London Plan Policy 4.4, Policy E7 of the draft London Plan and the draft Old Kent Road Area Action Plan.
601. Housing and affordable housing: 35% by habitable room with a 70/30 split in favour of affordable rent. The viability information will be tested to determine the maximum level of affordable housing, affordability and appropriate review mechanisms. Grant funding

must be investigated. It is noted that this is a phased, mid-to-long term scheme, and the imposition of late stage reviews are not inconsistent with the London Plan and are required by draft London Plan Policy H6. Further discussions will be required to determine appropriate review mechanisms for this scheme.

602. Design and heritage: The layout, design and massing is broadly supported in line with the aspirations for the Opportunity Area, but further information on the function of the civic square, the activation of public routes and the relationship with adjoining development sites must be submitted. The proposal would cause less than substantial harm to heritage assets which are outweighed by the benefits of the proposals, in accordance with the NPPF.
603. Transport: In advance of the Bakerloo Line Extension (BLE) and other improvements, there is limited capacity on the public transport network to accommodate additional travel generated by this development. Therefore, contributions towards improvements for bus and active travel are required. The applicant must address the identified deficiencies in the proposed public realm. Cycle and car parking are not currently compliant with draft London Plan requirements and this should be further addressed. Conditions and obligations are required.
604. Further information on Transport, Energy and Drainage is required.
605. Officer Response: These comments have been noted and are discussed in the main body of the report, where relevant.
606. Transport for London: Comments made as follows.  
  
Buses: Contributions would be required to improve local bus capacity.
607. Bakerloo Line Extension: A condition requiring foundation design details should be submitted to ensure there would be no conflict with the BLE running tunnels.
608. Cycling, walking and public realm: A contribution towards TfL's Healthy Streets scheme should be secured. Funding should be sought to address poor cycling conditions as per the submitted cycling assessment. The site entrance from Malt Street only has a 2m footway on one side of the road, which is unacceptable.
609. Contributions are required towards wayfinding and a new cycle hire docking station.
610. Parking: In line with draft London Plan policy T6 and taking account of future PTAL, the residential element of this development should be car-free except parking for accessible spaces for people with disabilities. The proposed provision of residents' parking spaces not reserved for people with disabilities is therefore not compliant with policy. Similarly, aside from parking for people with disabilities, there should be no parking associated with B-class uses, and for A-class and D-class uses it will need to be justified. The "operational" parking spaces to accommodate parking by tradespersons (plumbers, electricians, etc.) working within the site is welcomed.
611. The Section 106 agreement should include provisions to exclude residents from eligibility for parking permits in the surrounding Controlled Parking Zone, and potentially funding to extend the CPZ to cover a wider parking catchment area for the proposed development. Electric vehicle charging points are proposed in line with previous policy, and so should be increased to provide active charging points for 20% of spaces and passive provision for the remaining 80%.

612. For the residential element, the proposed 3% ratio for accessible spaces to the number of residential units meets the draft London Plan standards for initial provision. However, a Parking Design and Management Plan will be required to show how this could be increased to a total of 10% if necessary.
613. The supporting documentation does not demonstrate that the proposed number of cycle parking places meets the quantum requirements set out in the draft London Plan. Further, the limited information provided shows that a very small proportion will be provided in an accessible form,.
614. Servicing: That draft Delivery and service management plan is welcomed but requires considerable improvement with stronger measures to reduce the impact of servicing vehicles, particularly during peak hours, and so a revised plan should be secured by condition.
615. Travel plans: Travel Plans for each of the main uses is supplied but require improvement to meet acceptable standards. In particular there is considerable scope to encourage and support cycling.
616. Construction Management Plan: The submitted Construction Environmental Management Plan is relatively comprehensive but should be improved through firmer proposals on reducing peak hour lorry movements, examining routes to avoid left turns from routes with cyclist movements, and requiring the use of vehicles with safety features including those meeting the Direct Vision Standard.
617. Officer Response: These comments have been noted and are discussed in the main body of the report, where relevant.
618. Historic England: Please refer to our previous comments which still stand.
619. Officer Response: Noted.
620. Health and Safety Executive: Please consult the HSE's Planning Advice WebApp for advice on this application, which lies very close to the Major Hazard H1728 – Southern Gas Networks Plc, Old Kent Road.
621. Officer response: The WebApp has been consulted. The maps on the WebApp make clear that the site is located outside of the designated Consultation Distance for the Hazard and accordingly does not raise any issues that need to be taken into account during the determination of the application.
622. Natural England: The advice in our previous response still stands.
623. Officer Response: Noted.
624. Environment Agency: No further comments to make.
625. Officer Response: Noted.
626. Thames Water: Refer to previous comments made.
627. Officer Response: Noted.
628. London Underground Infrastructure Protection: No comments.

629. Officer Response: Noted.
630. London Fire and Emergency Planning Authority:  
An undertaking should be given that, access for fire appliances as required by Part B5 of the current Building Regulations Approved Document and adequate water supplies for fire fighting purposes, will be provided.
631. This is without prejudice to any requirements or recommendations that may be made by the Authority under the Regulatory Reform (Fire Safety) Order 2005/Petroleum (Consolidation) Act 1928, the local authority or the Health and Safety Executive.
632. Officer Response: Noted.
633. Metropolitan Police: A Secured by Design condition attached to any permission that may be granted in connection with this application and that the wording is such that 'The development must adhere to the principles and physical security requirements of Secured By Design'. For this development, it to be two-part: pre-commencement of works, and pre-occupation.
634. Officer Response: Noted. This has been included.
635. Arqiva: No observations to make.
636. Officer Response: Noted.
637. National Air Traffic Safeguarding: The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS has no safeguarding objection to the proposal.
638. Officer Response: Noted.
639. Local groups
640. Space Studios: Objection.

Blocks B1, B2, B3 and B10 of the proposed development at the Malt Street Site with building heights up to approximately 43m, 53m, 76m and 50m effectively wrap around the northern and eastern sides of the studios. The cumulative effect of these buildings by virtue of their siting, orientation and excessive mass and height will adversely impact the levels of natural light to windows in the north and east elevations of the studios. This undermines one the key features that facilitate the use of the building as artistic and creative workspace.

641. Introducing residential uses in close proximity to the external yard area to the north of the studios introduces sensitive receptors which could constrain the ongoing use of this space which is available 24 hours/7 days a week as an integral component of the studios.
642. Planning policy seeks to protect facilities such as the SPACE studios given their important contribution to the area and London. The proposed development at the Malt Street Site in its current form does not achieve the harmonious vision of mixed-use development set out in the Old Kent Road AAP.
643. Officer Response: There would be a loss of daylight to Space Studios; this is discussed at paragraphs 404-408 The proposed development would include "Agent

for Change” principles so as to ensure the proposed development would integrate with existing businesses and this is discussed at paragraphs 135-137.

644. Glengall Road Residents Association (GRA):

1. Height of the buildings

- a. Resulting loss of light and privacy
- b. Huge increase in population density in the area
- c. Fire safety concerns--post Grenfell High Rise Building Review – one stairwell for most buildings
- d. Effects of wind on the cumulative assembly of tall buildings by several developers.

2. Aesthetics

- a. Architectural legacy – plethora of ‘ugly’ buildings and no coherence from site to site

3. Lack of adequate transportation in the area

- a. Current issues with buses
- b. Already heavily used by cyclists

4. Parking

- a. Regardless of controlled parking zones, volume of cars in the area will still increase

5. Works traffic during constructions.

6. Commercial transport access after construction

7. Sale of properties

- a. Many questioned the reality of the non-affordable housing apartments being sold to UK residents
- b. Concern that the interests of shareholders were being put before the needs of Southwark residents for Social Housing.

8. Extension of Bakerloo line

- a. Concern around transport capacity in interim before Bakerloo line extension completed.

645. The GRA also submitted a light and shadow photo study to highlight the impact tall buildings have on the surrounding gardens and streets. The aim being to show the developers what our current experience is vs what will be lost/changed.

646. The study showed that between 0830-1030 in early October 2018, the shadows of ‘One The Elephant’ and the ‘UNCLE’ towers (both 40-plus storeys/ca140metres high), reached the Imperial War Museum and the junction of Brook Drive and Kennington Road, 550 metres and 665 metres respectively.

647. When the shadow evidence is projected onto the Malt St proposal, it shows that the morning shadows of Block B4 tower will reach the lake in Burgess Park, crossing Glengall Rd, Trafalgar Avenue, and the Cobourg Primary School en route, and will last for 2-3 hours each morning from Autumn through to Spring.

648. The 40-storey tall buildings in other current proposals will have a cumulative and interactive effect.

649. There are also two new London Views for potential consideration for Listing by Lewisham – Blythe Hill Fields and Upper Telegraph Hill Park--through to St Paul’s. If successful, then tower heights would need to be reviewed, and Southwark may wish to give consideration in the interim.

650. Officer Response: The height of the proposed buildings is found acceptable being in

line with the massing strategy of the draft OKR AAP. The buildings on Glengall Road would be sufficiently distanced at approximately 100m away and would not cause any harmful overlooking.

- 651. The applicant has carried out some daylight testing to the Glengall Road properties in the light of the objection received (to no's 33 and 35 Glengall Road). The results clearly show that these properties would continue to receive very good levels of daylight with the proposed development in place. The worst affected window would be a 1<sup>st</sup> floor window to No. 33 Glengall Road which would receive a reduction of 7%, which is well within the 20% tolerance of the BRE.
- 652. In relation to overshadowing, the transient overshadowing analysis shows there would be some overshadowing of the Glengall Road rear gardens on 21<sup>st</sup> March but this shadow would be limited to between 0800 and 0900 hours. After 0900 hours, the shadow moves around and away from Glengall Road.
- 653. Impacts on wind microclimate, fire safety, parking, transport capacity and the appearance of the proposed buildings have been discussed in relevant sections of the report. A significant financial contribution would be collected towards improving bus capacity in advance of the BLE.

Southwark Living Streets: Object.

- 654. Object on the basis of the 129 car parking spaces. The development is excessive and is against the spirit and policy of the draft AAP. The intention of the Opportunity Area and the Mayor's Transport Strategy is to reduce car use and car dominance along the Old Kent Road in order to facilitate active forms of travel.
- 655. Officer Response: It is accepted this aspect of the scheme would not be compliant with planning policies. As mitigation, the proposed development would include 40% electric vehicle charging points.

**Third re-consultation**

- 656. A third round of re-consultation was carried out following the March/April 2019 revisions to the scheme. 5 representations were received, 4 in objection and 1 in support. The 3 objections were received on the following grounds, as summarised by the table below.

**Table: Objections – third consultation**

<b>Objection</b>	<b>Officer response</b>
Building height – The buildings are still too tall.	The acceptability of the tall buildings has been discussed in the main body of the report and has been found to be acceptable and would be in compliance with adopted planning policy, being located in a London Plan opportunity area in a London Plan transport and growth corridor at a point of landmark significance and making a very positive contribution to the landscape.

The shade cast by the tall buildings sadly means that the proposed linear park will be largely shaded so not a place to linger.	The overshadowing diagrams show that the linear park would receive good levels of sunlight.
Loss of privacy to Glengall Road properties.	The distance to Glengall Road properties is approximately 100m and because of this distance, no loss of privacy is expected to result.
Loss of daylight and sunlight to Glengall Road.	The applicant's daylight consultant has confirmed that there would be little, if any impact to buildings on Glengall Road.
Why is the loss of the industrial land and replacement with generalised 'workspace' appropriate.	4,513sqm floorspace has been proposed as guaranteed B1c (light industrial) floorspace.
As yet, the Area Action Plan is still being drafted, so these areas are not yet designated for tall buildings.	The acceptability of the tall buildings has been discussed in the main body of the report and has been found to be acceptable and would be in compliance with adopted planning policy, being located in a London Plan opportunity area in a London Plan transport and growth corridor at a point of landmark significance and making a very positive contribution to the landscape.
The councils approach is flawed. The piecemeal developer led approach means that the overall vision for the area is compromised.	The council has organised and held a number of landowner meetings with owners of separate sites to ensure a co-ordinated approach.
Solar panels are included, yet the overall inefficiency of building tall offsets any gains a few panels might offer.	A carbon off set payment would could be used for the installation of PV panels on existing buildings, insulation, energy efficient street lighting, tree planting, LED lightbulb exchanges, homeowner grants to replace boilers, funds for community led- projects etc.
Impact on local infrastructure – GP surgeries, supermarkets, public outdoor areas etc.	The proposed development would be subject to a Community Infrastructure Levy tax charge, which could be used to support additional education and health services.

657. 1 representation in support was received, which is summarised in the table below.

<b>Support</b>	<b>Officer response</b>
The development would improve the area.	Noted.

#### Statutory and non statutory consultees

658. Historic England: Welcome the reduction in height of block B6 but continue to rest on our previous comments in relation to the heights of buildings across this proposed development.
659. Officer Response: Noted.
660. Natural England: The advice in our previous response still stands.
661. Officer Response: Noted.
662. Environment Agency: No further comments to make.
663. Officer Response: Noted.
664. Arqiva: No comments.
665. Officer Response: Noted.
666. National Air Traffic Safeguarding (NATS): No objection.
667. Officer Response: Noted.

#### **Human rights implications**

668. 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.
669. This application has the legitimate aim of providing for a new mixed use development containing up to 1300 homes. 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/2381-B  Application file: 17/AP/2773  Southwark Local Development Framework and Development Plan Documents	Place and Wellbeing 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 5513 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>	Kiran Chauhan, Team Leader Old Kent Road	
<b>Version</b>	Final	
<b>Dated</b>	16 May 2019	
<b>Key Decision</b>	No	
<b>CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER</b>		
<b>Officer Title</b>	<b>Comments sought</b>	<b>Comments included</b>
Strategic Director of Finance & Governance	No	No
Strategic Director, 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>	16 May 2019	

## APPENDIX 1

### Consultation undertaken

**Site notice date:** 17/11/2018

**Press notice date:** 22/11/2018

**Case officer site visit date:** n/a

**Neighbour consultation letters sent:** 29/08/2017

#### Internal services consulted:

Ecology Officer  
Economic Development Team  
Environmental Protection Team Formal Consultation [Noise / Air Quality / Land Contamination / Ventilation]  
Flood and Drainage Team  
Highway Development Management  
Parks & Open Spaces  
Public Health Team  
Waste Management

#### Statutory and non-statutory organisations consulted:

Arqiva - digital communications  
Civil Aviation Authority  
Council for British Archaeology  
EDF Energy  
Environment Agency  
Greater London Authority  
Health & Safety Executive  
Historic England  
London Fire & Emergency Planning Authority  
London Underground Limited  
Metropolitan Police Service (Designing out Crime)  
National Air Traffic Safeguarding Office  
National Grid Transmission, National Grid House  
National Planning Casework Unit  
Natural England - London Region & South East Region  
Network Rail (Planning)  
Thames Water - Development Planning  
Transport for London (referable & non-referable app notifications and pre-apps)  
Unwin and Friary TRA, 1 Cardiff House  
Vital OKR

#### Neighbour and local groups consulted:

164a Choumert Road London SE15 4AB  
70 Goodwin Close Bermondsey SE16 3TL  
Flat 72, East Point Avondale Square SE1 5NT

40 Milestone House 434 Old Kent Road SE1 5YB  
6a Peckham Park Road London SE15 6TW  
452 Old Kent Road London SE1 5AA

36a Bird In Bush Rd Peckham SE15 6RW  
Flat 27 Millbrook House Friary Estate SE15 6TG  
Flat 26 Millbrook House Friary Estate SE15 6TG  
Flat 25 Millbrook House Friary Estate SE15 6TG  
Flat 28 Millbrook House Friary Estate SE15 6TG  
Flat 30 Millbrook House Friary Estate SE15 6TG  
Flat 3 Millbrook House Friary Estate SE15 6TG  
Flat 29 Millbrook House Friary Estate SE15 6TG  
Flat 24 Millbrook House Friary Estate SE15 6TG  
Flat 2 Millbrook House Friary Estate SE15 6TG  
Flat 19 Millbrook House Friary Estate SE15 6TG  
Flat 18 Millbrook House Friary Estate SE15 6TG  
Flat 20 Millbrook House Friary Estate SE15 6TG  
Flat 23 Millbrook House Friary Estate SE15 6TG  
Flat 22 Millbrook House Friary Estate SE15 6TG  
Flat 21 Millbrook House Friary Estate SE15 6TG  
Flat 4 Millbrook House Friary Estate SE15 6TG  
Flat 14 Northfield House Friary Estate SE15 6TL  
Flat 13 Northfield House Friary Estate SE15 6TL  
Flat 12 Northfield House Friary Estate SE15 6TL  
Flat 15 Northfield House Friary Estate SE15 6TL  
Flat 18 Northfield House Friary Estate SE15 6TL  
Flat 17 Northfield House Friary Estate SE15 6TL  
Flat 16 Northfield House Friary Estate SE15 6TL  
Flat 11 Northfield House Friary Estate SE15 6TL  
Flat 7 Millbrook House Friary Estate SE15 6TG  
Flat 6 Millbrook House Friary Estate SE15 6TG

Flat 5 Millbrook House Friary Estate SE15 6TG  
Flat 8 Millbrook House Friary Estate SE15 6TG  
Flat 10 Northfield House Friary Estate SE15 6TL  
Flat 1 Northfield House Friary Estate SE15 6TL  
Flat 9 Millbrook House Friary Estate SE15 6TG  
Flat 7 Deerhurst House Friary Estate SE15 6SZ  
Flat 6 Deerhurst House Friary Estate SE15 6SZ  
Flat 5 Deerhurst House Friary Estate SE15 6SZ  
Flat 8 Deerhurst House Friary Estate SE15 6SZ  
12 Peckham Park Road London SE15 6TW  
10 Peckham Park Road London SE15 6TW  
Flat 9 Deerhurst House Friary Estate SE15 6SZ  
Flat 4 Deerhurst House Friary Estate SE15 6SZ  
Flat 27 Deerhurst House Friary Estate SE15 6SZ  
Flat 26 Deerhurst House Friary Estate SE15 6SZ  
Flat 25 Deerhurst House Friary Estate SE15 6SZ  
Flat 28 Deerhurst House Friary Estate SE15 6SZ  
Flat 30 Deerhurst House Friary Estate SE15 6SZ  
Flat 3 Deerhurst House Friary Estate SE15 6SZ  
Flat 29 Deerhurst House Friary Estate SE15 6SZ

14 Peckham Park Road London SE15 6TW  
Flat 13 Millbrook House Friary Estate SE15 6TG  
Flat 12 Millbrook House Friary Estate SE15 6TG  
Flat 11 Millbrook House Friary Estate SE15 6TG

Flat 14 Millbrook House Friary Estate SE15 6TG  
Flat 17 Millbrook House Friary Estate SE15 6TG  
Flat 16 Millbrook House Friary Estate SE15 6TG  
Flat 15 Millbrook House Friary Estate SE15 6TG  
Flat 10 Millbrook House Friary Estate SE15 6TG  
20 Peckham Park Road London SE15 6TW  
18 Peckham Park Road London SE15 6TW  
16 Peckham Park Road London SE15 6TW  
22 Peckham Park Road London SE15 6TW  
Flat 1 Millbrook House Friary Estate SE15 6TG  
Haymerle School Haymerle Road SE15 6SY  
8 Peckham Park Road London SE15 6TW  
Flat 19 Northfield House Friary Estate SE15 6TL  
Flat 100 Northfield House Friary Estate SE15 6TN  
Flat 9 Northfield House Friary Estate SE15 6TL  
Flat 8 Northfield House Friary Estate SE15 6TL  
Flat 101 Northfield House Friary Estate SE15 6TN  
Flat 53 Northfield House Friary Estate SE15 6TN  
Flat 103 Northfield House Friary Estate SE15 6TN  
Flat 102 Northfield House Friary Estate SE15 6TN  
Flat 7 Northfield House Friary Estate SE15 6TL

49 Milestone House 434 Old Kent Road SE1 5YB  
Flat 5 41 Glengall Road SE15 6NF  
Flat 8 41 Glengall Road SE15 6NF  
Flat 7 41 Glengall Road SE15 6NF  
Flat 6 41 Glengall Road SE15 6NF  
48 Milestone House 434 Old Kent Road SE1 5YB  
43 Milestone House 434 Old Kent Road SE1 5YB  
42 Milestone House 434 Old Kent Road SE1 5YB  
41 Milestone House 434 Old Kent Road SE1 5YB  
44 Milestone House 434 Old Kent Road SE1 5YB  
47 Milestone House 434 Old Kent Road SE1 5YB  
46 Milestone House 434 Old Kent Road SE1 5YB  
45 Milestone House 434 Old Kent Road SE1 5YB  
4 Milestone House 434 Old Kent Road SE1 5YB  
3 Milestone House 434 Old Kent Road SE1 5YB  
2 Milestone House 434 Old Kent Road SE1 5YB  
5 Milestone House 434 Old Kent Road SE1 5YB  
8 Milestone House 434 Old Kent Road SE1 5YB  
7 Milestone House 434 Old Kent Road SE1 5YB  
6 Milestone House 434 Old Kent Road SE1 5YB  
1 Milestone House 434 Old Kent Road SE1 5YB  
Flat Middle Floor 2 462 Old Kent Road SE1 5AG  
Flat Top Floor 3 462 Old Kent Road SE1 5AG  
Flat 54 Oleander House SE15 6FS  
Flat Ground Floor 1 462 Old Kent Road SE1 5AG  
Milestone House 434 Old Kent Road SE1 5YB  
Selco Builders Warehouse Six Bridges Trading Estate SE1 5JX  
Shop 462 Old Kent Road SE1 5AG  
9 Milestone House 434 Old Kent Road SE1 5YB  
20 Milestone House 434 Old Kent Road SE1 5YB  
19 Milestone House 434 Old Kent Road SE1 5YB  
18 Milestone House 434 Old Kent Road SE1 5YB  
21 Milestone House 434 Old Kent Road SE1 5YB  
24 Milestone House 434 Old Kent Road SE1 5YB  
23 Milestone House 434 Old Kent Road SE1 5YB  
22 Milestone House 434 Old Kent Road SE1 5YB  
17 Milestone House 434 Old Kent Road SE1 5YB  
12 Milestone House 434 Old Kent Road SE1 5YB  
11 Milestone House 434 Old Kent Road SE1 5YB  
10 Milestone House 434 Old Kent Road SE1 5YB  
13 Milestone House 434 Old Kent Road SE1 5YB  
16 Milestone House 434 Old Kent Road SE1 5YB  
15 Milestone House 434 Old Kent Road SE1 5YB  
14 Milestone House 434 Old Kent Road SE1 5YB  
Studio 1 55 Glengall Road SE15 6NF  
Leyton Square Maismore Street SE15 6TP  
Part Ground Floor First Floor And Second Floor 3-5 Latona Road SE15 6RX  
First Floor 516 Old Kent Road SE1 5BA  
Ground Floor 55 Glengall Road SE15 6NF  
First Floor Flat 57 Glengall Road SE15 6NF  
Basement And Ground Floors 516 Old Kent Road SE1 5BA  
Part Ground Floor 3-5 Latona Road SE15 6RX  
Flat 3 Roman House SE1 5AN  
Flat 2 Roman House SE1 5AN  
Flat 1 Roman House SE1 5AN  
Flat 4 Roman House SE1 5AN  
7-17 Latona Road London SE15 6RY  
Flat 6 Roman House SE1 5AN  
Flat 5 Roman House SE1 5AN  
Rear Of 90 Latona Road SE15 6RY  
Flat 8 Howson Court SE1 5XQ  
Flat 7 Howson Court SE1 5XQ  
Flat 6 Howson Court SE1 5XQ  
Flat 9 Howson Court SE1 5XQ  
Flat 12 Howson Court SE1 5XQ  
Flat 11 Howson Court SE1 5XQ  
Flat 10 Howson Court SE1 5XQ  
Flat 5 Howson Court SE1 5XQ  
Flat 3 15 Glengall Road SE15 6NH  
Flat 2 15 Glengall Road SE15 6NH  
Flat 1 15 Glengall Road SE15 6NH  
Flat 1 Howson Court SE1 5XQ

Flat 5 Northfield House Friary Estate SE15 6TL  
Flat 49 Northfield House Friary Estate SE15 6TL  
Flat 48 Northfield House Friary Estate SE15 6TL  
Flat 50 Northfield House Friary Estate SE15 6TL  
Flat 6 Northfield House Friary Estate SE15 6TL  
Flat 52 Northfield House Friary Estate SE15 6TL  
Flat 51 Northfield House Friary Estate SE15 6TL  
Flat 54 Northfield House Friary Estate SE15 6TN  
Flat 65 Northfield House Friary Estate SE15 6TN  
Flat 64 Northfield House Friary Estate SE15 6TN  
Flat 63 Northfield House Friary Estate SE15 6TN  
Flat 66 Northfield House Friary Estate SE15 6TN  
Flat 69 Northfield House Friary Estate SE15 6TN  
Flat 68 Northfield House Friary Estate SE15 6TN  
Flat 67 Northfield House Friary Estate SE15 6TN  
Flat 62 Northfield House Friary Estate SE15 6TN  
Flat 57 Northfield House Friary Estate SE15 6TN  
Flat 56 Northfield House Friary Estate SE15 6TN  
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Flat 58 Northfield House Friary Estate SE15 6TN  
Flat 61 Northfield House Friary Estate SE15 6TN  
Flat 60 Northfield House Friary Estate SE15 6TN  
Flat 59 Northfield House Friary Estate SE15 6TN  
Flat 29 Northfield House Friary Estate SE15 6TL  
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Flat 27 Northfield House Friary Estate SE15 6TL  
Flat 3 Northfield House Friary Estate SE15 6TL  
Flat 32 Northfield House Friary Estate SE15 6TL  
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Flat 44 Northfield House Friary Estate SE15 6TL  
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Flat 34 Northfield House Friary Estate SE15 6TL  
Flat 37 Northfield House Friary Estate SE15 6TL  
Flat 4 Northfield House Friary Estate SE15 6TL  
Flat 39 Northfield House Friary Estate SE15 6TL  
Flat 38 Northfield House Friary Estate SE15 6TL  
71 Haymerle Road London SE15 6SQ  
69 Haymerle Road London SE15 6SQ  
67 Haymerle Road London SE15 6SQ  
73 Haymerle Road London SE15 6SQ  
79 Haymerle Road London SE15 6SQ  
77 Haymerle Road London SE15 6SQ  
75 Haymerle Road London SE15 6SQ  
65 Haymerle Road London SE15 6SQ  
84 Latona Road London SE15 6RY  
82 Latona Road London SE15 6RY  
80 Latona Road London SE15 6RY  
86 Latona Road London SE15 6RY  
92 Latona Road London SE15 6RY  
90 Latona Road London SE15 6RY  
88 Latona Road London SE15 6RY  
81 Haymerle Road London SE15 6SQ  
Flat 10 Denstone House Friary Estate SE15 6SG  
Flat 1 Denstone House Friary Estate SE15 6SG

Flat 4 Howson Court SE1 5XQ  
Flat 3 Howson Court SE1 5XQ  
Flat 2 Howson Court SE1 5XQ  
Flat 11 Portway House SE1 5XY  
Flat 10 Portway House SE1 5XY  
Flat 9 Portway House SE1 5XY  
Flat 12 Portway House SE1 5XY  
Flat 15 Portway House SE1 5XY  
Flat 14 Portway House SE1 5XY  
Flat 13 Portway House SE1 5XY  
Flat 8 Portway House SE1 5XY  
Flat 3 Portway House SE1 5XY  
Flat 2 Portway House SE1 5XY  
Flat 1 Portway House SE1 5XY  
Flat 4 Portway House SE1 5XY  
Flat 7 Portway House SE1 5XY  
Flat 6 Portway House SE1 5XY  
Flat 5 Portway House SE1 5XY  
Flat 16 Portway House SE1 5XY  
Flat 27 Portway House SE1 5XY  
Flat 26 Portway House SE1 5XY  
Flat 25 Portway House SE1 5XY  
Flat 28 Portway House SE1 5XY  
Flat 30 Portway House SE1 5XY  
Flat 29 Portway House SE1 5XY  
Flat 24 Portway House SE1 5XY  
Flat 19 Portway House SE1 5XY  
Flat 18 Portway House SE1 5XY  
Flat 17 Portway House SE1 5XY  
Flat 20 Portway House SE1 5XY  
Flat 23 Portway House SE1 5XY  
Flat 22 Portway House SE1 5XY  
Flat 21 Portway House SE1 5XY  
Units 10 To 13 Glengall Business Centre SE15 6NF  
Unit 9 Glengall Business Centre SE15 6NF  
The Laundry Room Greystoke House Friary Estate SE15 6TQ  
Ground Floor Flat 50 Glengall Road SE15 6NH  
Second Floor Flat 50 Glengall Road SE15 6NH  
First Floor Flat 50 Glengall Road SE15 6NH  
Unit 8 Glengall Business Centre SE15 6NF  
Unit 3 Glengall Business Centre SE15 6NF  
Unit 2 Glengall Business Centre SE15 6NF  
Unit 1 Glengall Business Centre SE15 6NF  
Unit 4 Glengall Business Centre SE15 6NF  
Unit 7 Glengall Business Centre SE15 6NF  
Unit 6 Glengall Business Centre SE15 6NF  
Unit 5 Glengall Business Centre SE15 6NF  
Second Floor And Third Floor 55 Glengall Road SE15 6NF  
4-5 Brideale Close London SE15 6NB  
1d Livesey Place London SE15 6SL  
Flat 1 Oleander House SE1 5AG  
Flat 4 Oleander House SE1 5AG  
Flat 3 Oleander House SE1 5AG  
Flat 2 Oleander House SE1 5AG  
1c Livesey Place London SE15 6SL  
First Floor Flat 40a Glengall Road SE15 6NH  
Unit 2b Cantium Retail Park SE1 5BA  
Unit 2a Cantium Retail Park SE1 5BA  
Ground Floor Front 16 Peckham Park Road SE15 6TW  
1b Livesey Place London SE15 6SL  
1a Livesey Place London SE15 6SL  
Ground Floor Rear 16 Peckham Park Road SE15 6TW  
66c Glengall Road London SE15 6NH  
74c Glengall Road London SE15 6NH  
66a Glengall Road London SE15 6NH  
74b Glengall Road London SE15 6NH  
74a Glengall Road London SE15 6NH  
Unit 0z05 Ground Floor 54-80 Ossory Road SE1 5AN  
Room 4 78b Glengall Road SE15 6NH  
Top Floor Flat 68 Glengall Road SE15 6NH  
20 Latona Road London SE15 6RX  
Inspiration House Second Floor 54-80 Ossory Road SE1 5AN

18a Latona Road London SE15 6RX  
Flat 11 Denstone House Friary Estate SE15 6SG  
Flat 14 Denstone House Friary Estate SE15 6SG  
Flat 13 Denstone House Friary Estate SE15 6SG  
Flat 12 Denstone House Friary Estate SE15 6SG  
35a Glengall Road London SE15 6NJ  
76a Glengall Road London SE15 6NH  
83 Haymerle Road London SE15 6SQ  
76b Glengall Road London SE15 6NH  
80b Glengall Road London SE15 6NH

80a Glengall Road London SE15 6NH  
76c Glengall Road London SE15 6NH

38 Latona Road London SE15 6RY

36 Latona Road London SE15 6RY  
34 Latona Road London SE15 6RY  
40 Latona Road London SE15 6RY  
46 Latona Road London SE15 6RY  
44 Latona Road London SE15 6RY  
42 Latona Road London SE15 6RY  
32 Latona Road London SE15 6RY  
22 Latona Road London SE15 6RY  
8 Latona Road London SE15 6RX  
6 Latona Road London SE15 6RX  
24 Latona Road London SE15 6RY  
30 Latona Road London SE15 6RY  
28 Latona Road London SE15 6RY  
26 Latona Road London SE15 6RY  
48 Latona Road London SE15 6RY  
70 Latona Road London SE15 6RY  
68 Latona Road London SE15 6RY  
66 Latona Road London SE15 6RY  
72 Latona Road London SE15 6RY  
78 Latona Road London SE15 6RY  
76 Latona Road London SE15 6RY  
74 Latona Road London SE15 6RY  
64 Latona Road London SE15 6RY  
54 Latona Road London SE15 6RY  
52 Latona Road London SE15 6RY  
50 Latona Road London SE15 6RY  
56 Latona Road London SE15 6RY  
62 Latona Road London SE15 6RY  
60 Latona Road London SE15 6RY  
58 Latona Road London SE15 6RY  
Flat 15 Denstone House Friary Estate SE15 6SG  
6 Unwin Close London SE15 6SH  
5 Unwin Close London SE15 6SH  
4 Unwin Close London SE15 6SH  
7 Unwin Close London SE15 6SH  
Flat 1 Deerhurst House Friary Estate SE15 6SZ  
9 Unwin Close London SE15 6SH  
8 Unwin Close London SE15 6SH  
3 Unwin Close London SE15 6SH  
24 Unwin Close London SE15 6SH  
23 Unwin Close London SE15 6SH  
22 Unwin Close London SE15 6SH  
25 Unwin Close London SE15 6SH  
28 Unwin Close London SE15 6SH  
27 Unwin Close London SE15 6SH  
26 Unwin Close London SE15 6SH  
Flat 10 Deerhurst House Friary Estate SE15 6SZ  
Flat 20 Deerhurst House Friary Estate SE15 6SZ  
Flat 2 Deerhurst House Friary Estate SE15 6SZ  
Flat 19 Deerhurst House Friary Estate SE15 6SZ  
Flat 21 Deerhurst House Friary Estate SE15 6SZ  
Flat 24 Deerhurst House Friary Estate SE15 6SZ  
Flat 23 Deerhurst House Friary Estate SE15 6SZ  
Flat 22 Deerhurst House Friary Estate SE15 6SZ  
Flat 18 Deerhurst House Friary Estate SE15 6SZ  
Flat 13 Deerhurst House Friary Estate SE15 6SZ  
Flat 12 Deerhurst House Friary Estate SE15 6SZ  
Flat 11 Deerhurst House Friary Estate SE15 6SZ  
Flat 14 Deerhurst House Friary Estate SE15 6SZ

Surrey Wharf 30 Olmar Street SE1 5AY  
John Penry House 1 Marlborough Grove SE1 5JS  
Council Depot Frensham Street SE15 6TH  
Flat B 44 Glengall Road SE15 6NH  
Flat A 44 Glengall Road SE15 6NH  
Asda 478-500 Old Kent Road SE1 5AS  
Flat C 44 Glengall Road SE15 6NH  
Units B2 And B3 Six Bridges Trading Estate SE1 5JT  
Unit B4 Six Bridges Trading Estate SE1 5JT  
Unwin And Friary Tenants And Residents Community  
Hall 33 Frensham Street SE15 6TH  
Flat 1 547 Old Kent Road SE1 5EW  
Ground Floor And First Floor 54-80 Ossory Road SE1  
5AN  
First Floor And Second Floor Flat 5 Glengall Road SE15  
6NJ  
Basement Flat 5 Glengall Road SE15 6NJ  
24-50 Ossory Road London SE1 5AN  
Flat 5 Oleander House SE1 5AG  
Flat 33 Oleander House SE15 6FS  
Flat 32 Oleander House SE15 6FS  
Flat 31 Oleander House SE15 6FS  
Flat 34 Oleander House SE15 6FS  
Flat 37 Oleander House SE15 6FS  
Flat 36 Oleander House SE15 6FS  
Flat 35 Oleander House SE15 6FS  
Flat 30 Oleander House SE15 6FS  
Flat 25 Oleander House SE15 6FS  
Flat 24 Oleander House SE15 6FS  
Flat 23 Oleander House SE15 6FS  
Flat 26 Oleander House SE15 6FS  
Flat 29 Oleander House SE15 6FS  
Flat 28 Oleander House SE15 6FS  
Flat 27 Oleander House SE15 6FS  
Flat 38 Oleander House SE15 6FS  
Flat 49 Oleander House SE15 6FS  
Flat 48 Oleander House SE15 6FS  
Flat 47 Oleander House SE15 6FS  
Flat 50 Oleander House SE15 6FS  
Flat 53 Oleander House SE15 6FS  
Flat 52 Oleander House SE15 6FS  
Flat 51 Oleander House SE15 6FS  
Flat 46 Oleander House SE15 6FS  
Flat 41 Oleander House SE15 6FS  
Flat 40 Oleander House SE15 6FS  
Flat 39 Oleander House SE15 6FS  
Flat 42 Oleander House SE15 6FS  
Flat 45 Oleander House SE15 6FS  
Flat 44 Oleander House SE15 6FS  
Flat 43 Oleander House SE15 6FS  
430a Old Kent Road London SE1 5AG  
Flat 55 Oleander House SE15 6NJ  
Flat 58 Oleander House SE15 6NJ  
Flat 57 Oleander House SE15 6NJ  
Flat 56 Oleander House SE15 6NJ  
432 Old Kent Road London SE1 5AG  
Flat 8 Oleander House SE1 5AG  
Flat 7 Oleander House SE1 5AG  
Flat 6 Oleander House SE1 5AG  
Flat 9 Oleander House SE1 5AG  
Flat 12 Oleander House SE1 5AG  
Flat 11 Oleander House SE1 5AG  
Flat 10 Oleander House SE1 5AG  
Flat 59 Oleander House SE15 6NJ  
Flat 18 Oleander House SE15 6FS  
Flat 17 Oleander House SE15 6FS  
Flat 16 Oleander House SE15 6FS  
Flat 19 Oleander House SE15 6FS  
Flat 22 Oleander House SE15 6FS  
Flat 21 Oleander House SE15 6FS  
Flat 20 Oleander House SE15 6FS  
Flat 15 Oleander House SE15 6FS  
Flat 62 Oleander House SE15 6NJ  
Flat 61 Oleander House SE15 6NJ  
Flat 60 Oleander House SE15 6NJ

Flat 17 Deerhurst House Friary Estate SE15 6SZ  
Flat 16 Deerhurst House Friary Estate SE15 6SZ  
Flat 15 Deerhurst House Friary Estate SE15 6SZ  
Flat 3 Denstone House Friary Estate SE15 6SG  
Flat 24 Denstone House Friary Estate SE15 6SG  
Flat 23 Denstone House Friary Estate SE15 6SG  
Flat 4 Denstone House Friary Estate SE15 6SG  
Flat 7 Denstone House Friary Estate SE15 6SG  
Flat 6 Denstone House Friary Estate SE15 6SG  
Flat 5 Denstone House Friary Estate SE15 6SG  
Flat 22 Denstone House Friary Estate SE15 6SG  
Flat 18 Denstone House Friary Estate SE15 6SG  
Flat 17 Denstone House Friary Estate SE15 6SG  
Flat 16 Denstone House Friary Estate SE15 6SG  
Flat 19 Denstone House Friary Estate SE15 6SG  
Flat 21 Denstone House Friary Estate SE15 6SG  
Flat 20 Denstone House Friary Estate SE15 6SG  
Flat 2 Denstone House Friary Estate SE15 6SG  
Flat 8 Denstone House Friary Estate SE15 6SG  
18 Unwin Close London SE15 6SH  
17 Unwin Close London SE15 6SH  
16 Unwin Close London SE15 6SH  
19 Unwin Close London SE15 6SH  
21 Unwin Close London SE15 6SH  
20 Unwin Close London SE15 6SH  
2 Unwin Close London SE15 6SH  
15 Unwin Close London SE15 6SH  
10 Unwin Close London SE15 6SH  
1 Unwin Close London SE15 6SH  
Flat 9 Denstone House Friary Estate SE15 6SG  
11 Unwin Close London SE15 6SH  
14 Unwin Close London SE15 6SH  
13 Unwin Close London SE15 6SH  
12 Unwin Close London SE15 6SH  
48b Glengall Road London SE15 6NH  
48a Glengall Road London SE15 6NH  
25-29 Lovegrove Street London SE1 5ER  
Western Wharf Livesey Place SE15 6SL  
Hygrade Meats Ltd Latona Road SE15 6RX  
Third Floor Flat Surrey Wharf SE1 5AU  
Ground Floor 10 Peckham Park Road SE15 6TW  
Ground Floor 8 Peckham Park Road SE15 6TW

Unit B 2-10 Ossory Road SE1 5AN  
14 Ednam House Friary Estate Latona Road SE15 6SE  
13 Ednam House Friary Estate Latona Road SE15 6SE  
12 Ednam House Friary Estate Latona Road SE15 6SE  
15 Ednam House Friary Estate Latona Road SE15 6SE  
18 Ednam House Friary Estate Latona Road SE15 6SE  
17 Ednam House Friary Estate Latona Road SE15 6SE  
16 Ednam House Friary Estate Latona Road SE15 6SE  
11 Ednam House Friary Estate Latona Road SE15 6SE  
10 Ednam House Friary Estate Latona Road SE15 6SE  
1 Ednam House Friary Estate Latona Road SE15 6SE  
Flat 3 John Penry House SE1 5JS  
Flat 2 John Penry House SE1 5JS  
Flat 1 John Penry House SE1 5JS  
Flat 4 John Penry House SE1 5JS  
Flat 7 John Penry House SE1 5JS  
Flat 6 John Penry House SE1 5JS  
Flat 5 John Penry House SE1 5JS  
Third Floor Flat 541 Old Kent Road SE1 5EW  
Ground Floor Flat 68 Glengall Road SE15 6NH  
Ground Floor Flat 40a Glengall Road SE15 6NH  
Ground Floor And First Floor Flat 27 Glengall Road SE15 6NJ  
Ground Floor Flat 72 Glengall Road SE15 6NH  
Second Floor Flat 541 Old Kent Road SE1 5EW  
Ground Floor Flat 541 Old Kent Road SE1 5EW  
66b Glengall Road London SE15 6NH  
Flat 8 John Penry House SE1 5JS  
13-14 Frensham Street London SE15 6TH  
Flat 18 John Penry House SE1 5JS  
Flat 17 John Penry House SE1 5JS  
14 Frensham Street London SE15 6TH  
3-5 Latona Road London SE15 6RX

Flat 63 Oleander House SE15 6NJ  
Flat 14 Oleander House SE15 6FS  
Flat 13 Oleander House SE15 6FS  
Flat 64 Oleander House SE15 6NJ  
13 Glengall Road London SE15 6NJ  
11a Glengall Road London SE15 6NJ  
1 Glengall Road London SE15 6NJ  
40 Glengall Road London SE15 6NH  
589 Old Kent Road London SE15 1LA  
42 Glengall Road London SE15 6NH  
46 Glengall Road London SE15 6NH  
15 Glengall Road London SE15 6NJ  
35 Glengall Road London SE15 6NJ  
33 Glengall Road London SE15 6NJ  
31 Glengall Road London SE15 6NJ  
37 Glengall Road London SE15 6NJ  
7 Glengall Road London SE15 6NJ  
39 Glengall Road London SE15 6NJ  
3 Glengall Road London SE15 6NJ  
21 Glengall Road London SE15 6NJ  
19 Glengall Road London SE15 6NJ  
17 Glengall Road London SE15 6NJ  
23 Glengall Road London SE15 6NJ  
29 Glengall Road London SE15 6NJ  
25 Glengall Road London SE15 6NJ  
Flat 8 George Elliston House SE1 5ET  
Flat 7 George Elliston House SE1 5ET  
Flat 6 George Elliston House SE1 5ET  
Flat 9 George Elliston House SE1 5ET  
Flat 8a Lanark House Mawbey Estate SE1 5PF  
Flat 19a Lanark House Mawbey Estate SE1 5PF  
Flat 5 George Elliston House SE1 5ET  
Flat 41 George Elliston House SE1 5ET  
Flat 40 George Elliston House SE1 5ET  
Flat 4 George Elliston House SE1 5ET  
Flat 42 George Elliston House SE1 5ET  
Flat 45 George Elliston House SE1 5ET  
Flat 44 George Elliston House SE1 5ET  
Flat 43 George Elliston House SE1 5ET  
12 Ossory Road London SE1 5AN  
506-510 Old Kent Road London SE1 5BA  
The Everlasting Arms Ministry 600-608 Old Kent Road SE15 1JB  
591 Old Kent Road London SE15 1LA  
596-598 Old Kent Road London SE15 1JB  
593-613 Old Kent Road London SE15 1LA  
52 Ossory Road London SE1 5AN  
524 Old Kent Road London SE1 5BA  
518 Old Kent Road London SE1 5BA  
14-22 Ossory Road London SE1 5AN  
462 Old Kent Road London SE1 5AG  
Unit A Six Bridges Trading Estate SE1 5JT  
73 Glengall Road London SE15 6RU  
71 Glengall Road London SE15 6RU  
69 Glengall Road London SE15 6RU  
75 Glengall Road London SE15 6RU  
81 Glengall Road London SE15 6RU  
79 Glengall Road London SE15 6RU  
77 Glengall Road London SE15 6RU  
67 Glengall Road London SE15 6RU  
117 Glengall Road London SE15 6RU  
115 Glengall Road London SE15 6RU  
113 Glengall Road London SE15 6RU  
59 Glengall Road London SE15 6RU  
65 Glengall Road London SE15 6RU  
63 Glengall Road London SE15 6RU  
61 Glengall Road London SE15 6RU  
83 Glengall Road London SE15 6RU  
14 Latona Road London SE15 6RX  
12 Latona Road London SE15 6RX  
10 Latona Road London SE15 6RX  
16 Latona Road London SE15 6RX  
4 Latona Road London SE15 6RX  
2 Latona Road London SE15 6RX  
18 Latona Road London SE15 6RX





Flat 5 545 Old Kent Road SE1 5EW  
Basement Flat 72 Glengall Road SE15 6NH  
Basement Flat 27 Glengall Road SE15 6NF  
Basement Flat 541 Old Kent Road SE1 5EW  
Basement Flat 68 Glengall Road SE15 6NH  
Ground Floor And First Floor Flat 9 Glengall Road SE15 6NJ  
Flat C 543 Old Kent Road SE1 5EW  
Flat C 70 Glengall Road SE15 6NH  
Flat B 543 Old Kent Road SE1 5EW  
Flat 7 549 Old Kent Road SE1 5EW  
Flat 6 549 Old Kent Road SE1 5EW  
Flat 5 549 Old Kent Road SE1 5EW  
Flat 8 549 Old Kent Road SE1 5EW

Flat B 70 Glengall Road SE15 6NH  
Flat A 543 Old Kent Road SE1 5EW  
Flat A 70 Glengall Road SE15 6NH  
9 Brideale Close London SE15 6NB  
7 Brideale Close London SE15 6NB  
6-7 Brideale Close London SE15 6NB  
Polymex House 49-53 Glengall Road SE15 6NF  
Unit 3 To 4 Horizon Industrial Estate SE15 6SA  
6 Peckham Park Road London SE15 6TW  
11b Glengall Road London SE15 6NJ  
3 Brideale Close London SE15 6NB  
57 Glengall Road London SE15 6NF  
Flat 9 Greystoke House Friary Estate SE15 6TQ  
Flat 8 Greystoke House Friary Estate SE15 6TQ  
Unit 1 Horizon Industrial Estate SE15 6SA  
2 Brideale Close London SE15 6NB  
1 Brideale Close London SE15 6NB  
93 Haymerle Road London SE15 6SQ  
First Floor Flat 541 Old Kent Road SE1 5EW  
First Floor And Second Floor Flat 72 Glengall Road SE15 6NH  
Flat E 543 Old Kent Road SE1 5EW  
16a Peckham Park Road London SE15 6TW  
Flat 1 41 Glengall Road SE15 6NF  
First Floor Flat 18 Peckham Park Road SE15 6TW  
Flat D 543 Old Kent Road SE1 5EW  
2 Livesey Place London SE15 6SL  
Unit 2 Horizon Industrial Estate SE15 6SA  
24 Peckham Park Road London SE15 6TW  
9a Glengall Road London SE15 6NJ  
78b Glengall Road London SE15 6NH  
78a Glengall Road London SE15 6NH  
35 Milestone House 434 Old Kent Road SE1 5YB  
34 Milestone House 434 Old Kent Road SE1 5YB  
33 Milestone House 434 Old Kent Road SE1 5YB  
36 Milestone House 434 Old Kent Road SE1 5YB  
39 Milestone House 434 Old Kent Road SE1 5YB  
38 Milestone House 434 Old Kent Road SE1 5YB  
37 Milestone House 434 Old Kent Road SE1 5YB  
32 Milestone House 434 Old Kent Road SE1 5YB  
27 Milestone House 434 Old Kent Road SE1 5YB  
26 Milestone House 434 Old Kent Road SE1 5YB  
25 Milestone House 434 Old Kent Road SE1 5YB  
28 Milestone House 434 Old Kent Road SE1 5YB  
31 Milestone House 434 Old Kent Road SE1 5YB  
30 Milestone House 434 Old Kent Road SE1 5YB  
29 Milestone House 434 Old Kent Road SE1 5YB

Flat 9 Eric Wilkins House SE1 5ES  
Flat 4 Eric Wilkins House SE1 5ES  
Flat 18 Eric Wilkins House SE1 5ES  
Flat 17 Eric Wilkins House SE1 5ES  
Flat 16 Eric Wilkins House SE1 5ES  
Flat 19 Eric Wilkins House SE1 5ES  
Flat 3 Eric Wilkins House SE1 5ES  
Flat 20 Eric Wilkins House SE1 5ES  
Flat 2 Eric Wilkins House SE1 5ES

25 Heversham House Ilderton Rd SE15 1EL  
95 Friary Road Se15 1PY  
Space (Art Services Grants Limited) 129-131 Mare Street E8 3RH  
1 Glengall Road London SE15 6NJ  
Ossory Road London SE1 5AN  
62 Press Court 77 Marlborough Grove SE1 5JU  
Okr Oa London SE17 1PB  
97 Northfield House Peckham Park Rd SE15 6TN  
Northfield House Peckham Park Road  
Northfield House Peckham Park Road SE15 6TL  
31 Glengall Road London SE15 6NJ  
102 Glengall Road London SE15 6RR  
23 Glengall Road London SE15 6NJ  
92 Northfield House Peckham Park Road SE15 6TN  
92 Northfield House Peckham Park Road SE15 6TN  
76c Glengall Road London SE15 6NH  
109 Wells Way London SE5 7SZ  
73 Galleria Court Sumner Road Se15 6pw  
2 Glengall Terrace London SE15 6NW  
83 Apartment Galleria Court Sumner Road SE15 6PW  
3 Caversham House London SE15 6TA  
Flat 7 Galleria Court Sumner Road se15 6pw  
53 Galleria Court Sumner Rd SE15 6PW  
61 C. Heyford Avenue London SW81EA  
20 Oakdale Road London Se15 3bw  
11a Glengall Road London SE15 6NJ  
53 Galleria Court Sumner Road SE15 6PW  
88 Galleria Court Pennack Road SE15 6PY  
96a Friary Road London SE15 1PX  
22 Northfield House Peckham Park Road SE15 6TL  
27 Glengall Road London SE15 6NJ  
60 Galleria Court Sumner Road SE15 6PW  
5 Glengall Terrace London SE15 6NW  
7 Malfort Road SE5 8DQ  
Flat 8 London se5 7ub  
17 Howson Court, 525 Old Kent Road London SE1 5XQ  
90 Haymerle Road London SE15 6SD  
Flat B, 58b Peckham Hill Street Se15 5jy  
Hanover Park House 14-16 Hanover Park SE15 5HG  
28 Lugard Road London SE15 2TD  
Flat 2, 46d Bird In Bush Rd London SE15 6RW  
1 Cardiff House Peckham Park Road SE15 6TS  
45 Northfield House Peckham Park Road SE15 6TL  
52 Whitbread Road London SE4 2BE  
97 Atkins Road London SW12 0AL  
28 Sutherland Square London SE17 3EQ  
90 Haymerle Road London SE15 6SD  
London SE15  
16 Lacon Road London SE22 9HE  
Flat 16 Press Court 77 Marlborough Grove SE1 5JU

**Re-consultation: 14/11/2018**

## APPENDIX 2

### Consultation responses received

#### Internal services

Economic Development Team  
Environmental Protection Team Formal Consultation [Noise / Air Quality / Land Contamination / Ventilation]  
Flood and Drainage Team  
Public Health Team

#### Statutory and non-statutory organisations

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

#### Neighbours and local groups

London SE15  
Basement Flat 541 Old Kent Road SE1 5EW  
Email representation  
Flat B, 58b Peckham Hill Street Se15 5jy  
Flat 16 Press Court 77 Marlborough Grove SE1 5JU  
Flat 2 Portway House SE1 5XY  
Flat 2, 46d Bird In Bush Rd London SE15 6RW  
Flat 23 Portway House SE1 5XY  
Flat 37 Northfield House Friary Estate SE15 6TL  
Flat 38 Northfield House Friary Estate SE15 6TL  
Flat 47 Northfield House Friary Estate SE15 6TL  
Flat 7 Galleria Court Sumner Road se15 6pw  
Flat 72, East Point Avondale Square SE1 5NT  
Flat 8 London se5 7ub  
Flat 89 Northfield House Friary Estate SE15 6TN  
Flat 92 Northfield House Friary Estate SE15 6TN  
Hanover Park House 14-16 Hanover Park SE15 5HG  
Northfield House Peckham Park Road SE15 6TL  
Okr Oa London SE17 1PB  
Ossory Road London SE1 5AN  
Space (Art Services Grants Limited) 129-131 Mare Street E8 3RH  
1 Glengall Road London SE15 6NJ  
1 Glengall Road London SE15 6NJ  
102 Glengall Road London SE15 6RR  
109 Wells Way London SE5 7SZ  
11a Glengall Road London SE15 6NJ  
11a Glengall Road London SE15 6NJ  
16 Lacon Road London SE22 9HE  
164a Choumert Road London SE15 4AB  
17 Howson Court, 525 Old Kent Road London SE1 5XQ  
19 Glengall Road London SE15 6NJ

2 Glengall Terrace London SE15 6NW  
20 Oakdale Road London Se153bw  
21 Glengall Road London SE15 6NJ  
21 Glengall Road London SE15 6NJ  
21 Glengall Road London SE15 6NJ  
22 Northfield House Peckham Park Road SE15 6TL  
23 Glengall Road London SE15 6NJ  
23 Glengall Road London SE15 6NJ  
25 Heversham House Ilderton Rd SE15 1EL  
27 Glengall Road London SE15 6NJ  
28 Lugard Road London SE15 2TD  
28 Sutherland Square London SE17 3EQ  
28 Sutherland Square London SE17 3EQ  
29 Glengall Road London SE15 6NJ  
3 Caversham House London SE156TA  
31 Glengall Road London SE15 6NJ  
31 Glengall Road London SE15 6NJ  
33 Glengall Road London SE15 6NJ  
36a Bird In Bush Rd Peckham SE15 6RW  
36a Bird In Bush Rd Peckham SE15 6RW  
36a Bird In Bush Rd Peckham SE15 6RW  
42 Glengall Road London SE15 6NH  
44 Latona Road London SE15 6RY  
5 Glengall Terrace London SE15 6NW  
52 Whitbread Road London SE4 2BE  
53 Galleria Court Sumner Rd SE156PW  
53 Galleria Court Sumner Road SE15 6PW  
6 Latona Road London SE15 6RX  
60 Galleria Court Sumner Road SE15 6PW  
61 C. Heyford Avenue London SW81EA  
61 Ednam House Friary Estate Latona Road SE15 6SF  
62 Press Court 77 Marlborough Grove SE1 5JU  
62 Press Court 77 Marlborough Grove SE1 5JU  
62 Press Court 77 Marlborough Grove SE1 5JU  
66 Ednam House Friary Estate Latona Road SE15 6SF  
7 Malfort Road SE5 8DQ  
70 Goodwin Close Bermondsey SE16 3TL  
73 Galleria Court Sumner Road Se15 6pw  
76c Glengall Road London SE15 6NH  
76c Glengall Road London SE156NH  
83 Apartment Galleria Court Sumner Road SE15 6PW  
88 Galleria Court Pennack Road SE156PY  
90 Haymerle Road London SE15 6SB  
90 Haymerle Road London SE15 6SB  
90 Haymerle Road London SE15 6SD  
90 Haymerle Road London SE15 6SD  
92 Northfield House Peckham Park Road SE15 6TN  
92 Northfield House Peckham Park Road SE15 6TN  
95 Friary Road Se15 1PY  
96a Friary Road London SE151PX  
96a Friary Road London SE151PX  
97 Atkins Road London SW12 0AL  
97 Northfield House Peckham Park Rd SE15 6TN