

<b>Item No.</b> 6.2	<b>Classification:</b> Open	<b>Date:</b> 17 June 2019	<b>Meeting Name:</b> Planning Committee
<b>Report title:</b>	<p><b>Development Management planning application:</b> Application 18/AP/2761 for: Full Planning Application</p> <p><b>Address:</b> 301-303 ILBERTON ROAD, LONDON, SE15 1NW</p> <p><b>Proposal:</b> Demolition of existing buildings and construction of part 13 / part 14 storey building (+49.32m AOD) (plus basement) comprising 48 residential dwellings (Class C3) and commercial floorspace (Class B1(c)), creation of a new vehicular access from Hornshay Street with landscaping (including a communal roof garden), cycle parking and associated ancillary development.</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>	11/09/2018	<b>Application Expiry Date</b>	11/12/2018
<b>Earliest Decision Date</b> 04/01/2019			

## RECOMMENDATION

1. That the Planning Committee grant planning permission, subject to:
  - a) Conditions and referral to the Mayor of London and the applicant entering into an appropriate legal agreement by no later than 17<sup>th</sup> September 2019.
  - b) In the event that the requirements of (a) are not met by 17<sup>th</sup> September 2019 that the Director of Planning be authorised to refuse planning permission, if appropriate, for the reasons set out at paragraph 191 of this report.

## EXECUTIVE SUMMARY

2. This major application seeks to redevelop an existing car repairs and hand car wash site on the eastern side of Ilderton Road to provide a mixed-use commercial and residential development of 48 units and 449sqm of B1 commercial floorspace. The scheme is located in a Strategic Preferred Industrial Location and would represent a departure from policy by virtue of proposing the introduction of residential

accommodation to a Preferred Industrial Location.

3. The applicant has committed to providing 36% affordable housing by habitable rooms which equates to 14 affordable units, with a proposed tenure split of approximately 25% social rented and 10% intermediate by habitable rooms. There would be the potential for uplift in jobs on the site through the re-provision of good quality, flexible commercial space that would be more compatible with the neighbouring uses.
4. The proposed building is part 13/part 14 storeys and would be of a high quality design and deliver the master-planning and aspirations of the draft Old Kent Road Area Action Plan. The ground floor provides an active frontage and the pedestrian environment would be improved.
5. The proposed development would have limited impacts on neighbouring properties in terms of privacy, outlook and daylight and sunlight.
6. The proposed units would have good standard residential accommodation with appropriate mitigation measures to ensure noise levels internally are met as well as ensuring noise complaints against future commercial occupiers are minimised.
7. The proposal would be car free and future occupiers would be prevented from obtaining parking permits on the surrounding streets. A s106 contribution would be required to improve local bus infrastructure.
8. 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. Conditions are recommended to ensure that ground contamination, surface water drainage, archaeology and ecology would be adequately dealt with.
9. Overall, the clear benefits of the proposal are considered to outweigh the limited harm caused, and it is recommended that planning permission be granted, subject to conditions, a s106 agreement and referral to the GLA.

## **BACKGROUND INFORMATION**

### **Site location and description**

10. The application site comprises an area of 0.057 hectares (ha) and is triangular in its form, owing to its containment by Ilderton Road to the west, Hornshay Street to the north and the raised embankment of the South London Railway line to the east. To the rear of the site and railway line is the boundary of Lewisham Borough Council.
11. The site currently accommodates two uses; a car repair use (B2 class use) is accommodated within a single storey brick building with hipped roof and a car wash (Sui Generis class use) takes place within an open yard and associated temporary structures.
12. The surrounding area is a mix of residential estates to the west and east and industrial/quasi retail uses extending along the route of Ilderton Road to the north and south. Canterbury Industrial Estate is located to the north of the site on the opposite side of Hornshay Street and contains a number of light industrial units. Set back from

Ilderton Road to the west is the post-war Tustin Estate, which rises up to six residential storeys. Beyond the railway embankment to the east (on the opposite side of the railway line) is the Wheelshunters Social Club, which is part single and part two storeys in height with residential uses extending beyond.

13. The site is within the following Southwark planning policy designations:

Preferred Strategic Industrial Land (SPIL)  
Air Quality Management Area (AQMA)  
Bermondsey Lake Archaeological Priority Zone (APZ)

14. The site is also within the Old Kent Road Opportunity Area: Sub Area 4 – Hatcham, Ilderton & Old Kent Road (specifically OKR16)
15. The site also falls within a Site Allocation (NSP70) outlined in the emerging New Southwark Plan.
16. The site is also within the adopted London Plan's Strategic Industrial Land (SIL). The site falls within the extended background of Protected Vista 2A.1, which protects views from Parliament Hill Summit to St Paul's Cathedral.
17. The site is not within a conservation and buildings are not listed. There are no nearby heritage assets in its setting. The site has a Public Transport Accessibility Level (PTAL) rating of 4, which is moderate access to public transport. The site is within the Flood Zone 3.



Figure 1: View of the site.

### **Details of proposal**

18. The proposed scheme is for the demolition of the existing buildings for the construction of a part 13 part 14 storey building to provide 48 residential units and commercial

(light industrial) floor space (B1 class use) on the ground and first floor levels. The scheme has been amended following discussions with Officers. The amendments show the removal of the mezzanine floor as originally proposed and is replaced with a full first floor level for the commercial work space. This has resulted in the building increasing in height by 1 metre, with ceiling heights of 4m each on the ground and first floor levels and a total of 449sqm of light industrial floorspace, (an increase of 29sqm over the original plans).

19. The proposed mix of dwellings are:

	Number of units	Percentage (%)
Studios	6	13
1 bedroom unit	16	33
2 bedroom unit	17	35
3 bedroom unit	9	19
<b>Total</b>	<b>48</b>	<b>100</b>

20. The total maximum height of the building would be 49.32m AOD (46.8m from finished ground floor level). There is a basement proposed which would accommodate cycle storage and plant room.
21. Private amenity space is provided in the form of balconies and a communal garden on the 12th floor.
22. The scheme shall deliver 14 units as affordable housing to meet local housing needs, which represents 36% of all habitable rooms and 29% of all residential units as affordable.
23. Access to the commercial and residential uses would be from Ilderton Road, each with individual entrances. Servicing of the residential element of the development will be provided from Ilderton Road. To service the commercial space, a secondary servicing area with access taken from Hornshay Street will be delivered to the rear of the building. Ground floor residential refuse store is proposed on the Ilderton Road street frontage.
24. The detailed design has been amended following negotiations with Officers and the predominant material used would be brick.



Figure 2: Model of proposed development, view from the north

### Planning history

25. There is some planning history on the site including enforcement enquiries, but these have been closed. The most relevant planning history on this site is:

06/AP/0786 Application type: Full Planning Application (FUL)

Use as place of worship (Class D2)

Decision date 10/08/2006 Decision: Refused (REF)

Reason(s) for refusal:

*The proposed use of the building as a place of worship would result in the loss of employment floorspace within a designated preferred industrial location, as such the proposal would restrict local employment opportunities. The proposal is therefore contrary to Policy B.1.1 - 'Protection of Employment Areas and Identified Sites' of the adopted Unitary Development Plan 1995 and Policy 1.3 'Strategic and Local Preferred Industrial Locations' of the Southwark Plan [Modification Version] 2006 and 'Places of Worship' Supplementary Planning Guidance.*

*The proposed change of use of the premises to a 'Place of Worship' would, due to the proposed hours of operation and the potential for noise likely to be generated by people entering and leaving the building as well as activities within the premises,*

*result in a loss of amenity to the adjoining residential and business occupiers. In addition, the proposed location adjacent to a hand car wash facility where compressors are used would compromise the amenity (due to noise) of the users of the proposed place of worship. This would be contrary to policies E.3.1 'Protection of Amenity' and C.3.2 New Religious Buildings of the Southwark UDP (1995) and policies 2.2 Provision of New Community Facilities and 3.2 'Protection of Amenity' of The Southwark Plan [Modifications Version] 2006.*

*In the absence of any evidence or proposals to the contrary it is considered that the proposed use would, by reason of the hours of use, potential congregation numbers stated, adjacent car wash facility and existing levels of congestion within the street, be likely to result in levels of traffic generation and parking that would result in an increase in congestion and obstruction of surrounding streets to the detriment of the amenity of the occupiers of nearby premises. In addition a lack of information showing existing available on site parking spaces available was provided to assess safety and access to those potential spaces. The proposal is contrary to Objective T.1.3 'Design of Development and Conformity with Council Standards and Controls' of the adopted Unitary Development Plan 1995 and Policies 5.1 'Locating Developments' and 5.2 'Transport Impacts' of The Southwark Plan 2006 [Modifications Version].*

*The proposed application makes no provision for refuse storage or cycle parking facilities within the premises, as such the proposal is contrary to Policy T.1.3 'Design of Development and Conformity with Council Standards and Controls' of the Adopted Southwark Unitary Development Plan and Policies 3.7 'Waste Reduction' and 5.3 'Walking and Cycling' of the Southwark Plan [Modifications Version] 2006.*

17/EQ/0397 Application type: Pre-Application Enquiry (ENQ)

Mixed use redevelopment of the site consisting of 38 residential units providing a mix of unit sizes alongside the provision of 417sqm of commercial accommodation and communal roof garden measuring 140sqm.

Decision date 16/02/2018 Decision: Pre-application enquiry closed (EQC)

### **Planning history of adjoining sites**

26. The most relevant and recent planning history on the adjoining sites are as follows:  
313-349 Ilderton Road:

17/AP/4819 - Planning Committee resolved to grant planning permission subject to the completion of a legal agreement and referral to the GLA on 27th November 2018 for:

Full application for full planning permission for mixed use redevelopment comprising: Demolition of existing buildings and construction of two buildings one of part 11 & 13 storeys and one of part 13 and 15 storeys to provide 1,661sqm (GIA) of commercial floorspace (use class B1) at part basement, ground and first floors, 130 residential dwellings above (44 x 1 bed, 59 x 2 bed and 27 x 3 bed), with associated access and highway works, amenity areas, cycle, disabled & commercial car parking and refuse/recycling stores.

Unit 13 Canterbury Industrial Park, 297 Ilderton Road:

00/AP/1092 - Planning permission granted on 25th August 2000 for:  
Light industrial use, assembly and storage of machines for the plastic industry with occasional use of a spray booth.

### **SUMMARY OF CONSULTATION RESPONSES**

27. At the time of writing, a total of 3 No. consultation responses have been received from members of the public.
28. One of them is against the proposed development, one is in favour and one neither object nor support the proposals.
29. The main issues raised by the resident objecting to the proposed development are:
  - The contractor in this application has in the past caused inconvenience and also caused damage to property without any compensation.
  - The Council has also failed in all circumstances to remedy the damage caused by the contractors when the matter was referred to the council. If permission is granted, there would be more damage and inconvenience with no intention to remedy the damage.

#### Officers response:

30. The comments appear to relate to the existing operation of the car repairs and hand wash business. It appears to be a private dispute and it is not clear what the damages are. There does not appear to be any fundamental planning objections to the proposed scheme itself.
31. The comments received in support identify the following benefits:
  - Great use of a small site and prefer the proposals to what's currently there.
  - Great to see proposed commercial space as the current businesses there are dangerous.
  - The affordable housing offer is about 5% under the 35% target by their calculations so could be higher.
  - The building could even be a little higher to solve the housing crisis.
  - More people would also mean more customers for local businesses which would really help the local area thrive.

#### Officers response:

32. The comments are noted. The proposed development would deliver 29% affordable housing based on units, but would meet the 36% based on habitable rooms.
33. A general comment has been made by one member of the public:

As this is a reasonably large development, more green measures should be incorporated into the design. There is scope to include a biodiverse green roof and in the walls such as internal swift nest boxes.

Officers response:

34. The points are noted and these are addressed under the Ecology section of the report.
35. A planning condition will be applied that require swift nesting is provided.

## **KEY ISSUES FOR CONSIDERATION**

### **Summary of main issues**

36. The main issues to be considered in respect of this application are:
  - Principle in terms of land use, including consideration of emerging policy for the Old Kent Road Opportunity Area;
  - Environmental impact assessment;
  - Affordable housing;
  - Design issues, including height, scale and massing;
  - Housing mix;
  - Provision of commercial space;
  - Quality of accommodation;
  - Impact upon the amenity of neighbouring residential and commercial occupiers and the surrounding area;
  - Transport issues;
  - Impact on trees;
  - Planning obligations (Section 106 Undertaking or Agreement);
  - Sustainable development implications;
  - Other matters

### **Adopted planning policy**

#### National Planning Policy Framework (NPPF)

37. 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.
38. Paragraph 215 states that the policies in the Framework are material considerations which should be taken into account in dealing with applications.

Chapter 2 Achieving sustainable development  
Chapter 5 Delivering a sufficient supply of homes  
Chapter 6 Building a strong, competitive economy  
Chapter 8 Promoting healthy and safe communities  
Chapter 9 Promoting sustainable transport  
Chapter 11 Making effective use of land

Chapter 12 Achieving well-designed places  
Chapter 14 Meeting the challenge of climate change, flooding and coastal change  
Chapter 15 Conserving and enhancing the natural environment  
Chapter 16 Conserving and enhancing the historic environment

London Plan 2016

39. The London Plan is the regional planning framework and was adopted in 2016. The relevant policies of the London Plan 2016 are:

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 7.7 Location and Design of Tall and Large Buildings  
Policy 7.8 Heritage assets and archaeology  
Policy 7.21 Trees and woodlands  
Policy 8.2 Planning obligations  
Policy 8.3 Community infrastructure levy

40. 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" and identified an indicative employment capacity of 1,000 and a minimum of 2,500 new homes. 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.

41. 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

42. 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 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 (saved policies)

43. 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
- 2.5 - 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
- 3.19 - Archaeology
- 3.20 - Tall Buildings

- 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

Council's Supplementary Planning Document (SPD)

- 44. Sustainable design and construction SPD (2009)
- Sustainability assessments SPD (2009)
- Sustainable Transport SPD (2010)
- Affordable housing SPD (2008 - Adopted and 2011 - Draft)
- Residential Design Standards SPD (2011 and 2015)
- Section 106 Planning Obligations and Community Infrastructure Levy (2015)
- Development Viability SPD (2016)

Greater London Authority Supplementary Guidance

- 45. 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 planning policy**

Draft New London Plan

- 46. The draft New London Plan was published on 30 November 2017 and the first and only stage of consultation closed on 2 March 2018. The document is expected to reach examination stage later this year however, given the stage of preparation it can only be attributed limited weight.

Old Kent Road Area Action Plan (OKR AAP)

- 47. 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.
- 48. 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 16 which covers the Hatcham and Ilderton Road area. Requirements for this allocation site include replacement of existing employment floor space, provision of housing and on-site servicing.

#### New Southwark Plan

49. For the last 5 years the council has been preparing the New Southwark Plan (NSP) 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. It is anticipated that the plan will be adopted in 2019 following an Examination in Public (EIP). Similarly with the OKR AAP, 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.
50. The site is within the part of the site allocation NSP70 'Ilderton Road'. The vision for this area is for new homes (Class C3), employment (Class B uses), community uses (Class D) and retail (A1-4).

#### **Principle of development**

51. The site is located in the Core Strategy's Preferred Industrial Location-Strategic (SPIL) and also within the London Plan's Strategic Industrial Location (SIL) which is an industrial location of strategic importance as identified in the Core Strategy and the London Plan. Introducing housing here would therefore represent a departure from the adopted Southwark and London Plan.
52. 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).
53. Saved Southwark Plan policy 1.2 states that the only developments that will be permitted in SPILs are B class uses and other sui generis uses which are inappropriate in residential areas.
54. Adopted 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.
55. 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 Old Kent Road Area Action Plan (OKR AAP)

56. The emerging 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.
57. As stated above, the OKR AAP places the site within the proposed Action Area Core, and within proposal site OKR 16 which covers the Hatcham Road and Ilderton Road area.
58. Emerging policy AAP6 of the OKR AAP states that development must retain or increase the amount of B Class floorspace on site, accommodate existing businesses on site or in the wider Old Kent Road Opportunity Area or provide relocation options for businesses that would be displaced by redevelopment and result in an increase in the number of jobs provided. It also requires the workspace to be managed by a specialist provider and for an element of affordable workspace to be provided.
59. 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 OKR AAP 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.
60. The GLA points out that the Draft London Plan Policy E5 confirms that non SIL uses within SIL should be refused unless there has been a strategically co-ordinated process of SIL consolidation carried out through a planning framework or Development Plan document review process (and adopted as policy in a Development Plan), or as part of a co-ordinated masterplanning process in collaboration with the GLA.
61. The GLA also notes that the OKR AAP and New Southwark Plan proposes the release of significant areas of OKR SIL and would have resulted in the loss of much important industrial capacity within the OKR AAP area. However, these concerns have subsequently been addressed with the GLA and the Council agreeing an approach to phasing the release of protected industrial land for mixed use development in the Old Kent Road Opportunity Area.
62. Although the proposed development is on SIL, given the coordinated approach to the managed release of industrial land set out above, the proposed land uses are considered appropriate in strategic planning terms and generally comply with London Plan Policies.

63. The site area is 0.057 hectares and currently accommodates 225sqm of existing industrial floorspace capacity of which 168 sqm is general industrial (Use Class B2) and 57sqm industrial-related sui generis. The GLA noted that at a 65% plot ratio, this would equate to 390 sqm of potential industrial floorspace capacity. The scheme had originally proposed 433sqm of light industrial workspace with the provision of a mezzanine floor. Following discussions with the applicant, the mezzanine level has been omitted and a full first floor level is inserted to provide a total 449sqm of B1 class floor space. This would mean that there is no net loss of employment floorspace.
64. Notwithstanding the above, in determining whether the principle of the proposed development would be acceptable in land use terms, specifically the introduction of housing in the SPIL, Members need to consider whether the wider regeneration benefits of the scheme would outweigh any harm caused, and whether those benefits would therefore justify a departure from the adopted planning policy.
65. Officers consider that the key benefits arising from the proposal would be as follows.

#### Employment floorspace

66. As explained above, there would now be a slight increase of employment space. The enhanced space would potentially increase the number of jobs created on the site. To meet the policy requirements and to improve the likelihood of B1(c) occupiers leasing the units, it is recommended that the internal B1(c) fit out of the proposed commercial units would be secured through condition and a clause in the Section 106 Agreement. The space will be conditioned to be used for B1(c) use only.

#### Business relocation and retention

67. The existing uses and functions (hand car wash and car repair) on the site do not have to be situated within a SPIL location. Further details of the relocation and retention strategy will be secured by the legal agreement.

#### Job creation

68. The proposed enhanced commercial floor space would result in an increase in both the number and quality of jobs when compared with the existing operations on site and is a positive aspect of the proposal.

#### Affordable workspace

69. The applicant has agreed to provide an element of affordable workspace within the scheme comprising 10% of the commercial floorspace. The actual rents have not yet been confirmed, but Officers consider it appropriate for it to be similar to those levels that have been agreed on the adjoining site to the south at 313-349 Ilderton Road. This was agreed at £12 per sqft over a 15 year period. The applicant has accepted this level. The rents would be subject to inflation over this time. The level of rent would make the space affordable to creative industries and businesses and ensure businesses that require low rents have the opportunity to lease space within the area.
70. The employment space is shown on the first floor and rather than defining a precise area, which could be subject to change dependent on occupier, the plans show a

hatched zone to show an area of first floor space as affordable. In accordance with the GLA's guidance on industrial intensification/specification, it is considered that with the sizes of these units, they fall within the industrial typology of a workshop/studio space with a typical occupier being manufacturing (textile), arts & creative, other maker activities. However, it has also been designed to be flexible so that it could accommodate a range of different unit sizes and shared workspaces.

#### Specialist workspace provider

71. The employment space has been designed to be flexible so that it could accommodate a range of different unit sizes and shared workspaces. Details of a specialist workspace provider could be secured through a section 106 planning obligation.

#### Provision of housing, including affordable housing

72. The scheme would provide 48 new residential units, including policy compliant affordable housing comprising social rented and intermediate units in terms of habitable rooms. There is a pressing need for housing in the borough. The adopted London Plan (2016) requires the provision of a range of housing and sets the borough a target of 27,362 new homes between 2015 and 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. It would also be in accordance with emerging policy for the Old Kent Road Opportunity Area and the expectation of significant new housing provision.

#### Impact of the proposed residential use

73. It is recognised that the introduction of residential units could restrict and prejudice the operation of existing businesses in the area. Given the changing nature of the uses now carried out within the area, it is not felt that these businesses would be prejudiced and they could continue to operate and co-exist with the introduction of new residential uses provided schemes are well designed for this mix.
74. Residential accommodation within a mixed use context is already established within the immediate area. To the south of the site, residential units on Wagner Street within the Tustin Estate are located immediately opposite the site on the western side of Ilderton Road. Furthermore, a recent application for the site immediately to the south at 313-349 Ilderton Road (planning ref 17/AP/4819) has been submitted for mixed commercial and residential use. Planning Committee resolved to grant planning permission in November 2018 subject to completion of the s106 agreement. This application sought permission for the demolition of existing buildings and construction of two buildings to provide commercial floorspace (use class B1) at part basement, ground and first floors and 130 residential dwellings above. This mixed use development was considered to be a benefit to the area and the introduction of housing would not prejudice the operation of existing businesses of the area.

#### Prematurity

75. 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 lead growth. The 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 AAPs and the 2018 draft New London Plan. It is not therefore considered to be premature.

#### Conclusion on land use

76. To conclude in relation to land uses, the proposed development would be contrary to strategic policy 10 of the Core Strategy owing to the introduction of residential into the SPIL would represent a departure from the adopted development plan.
77. This must therefore be weighed against the benefits of the scheme which include:
- the provision of housing, of which 35% would be affordable;
  - re-provision and slight increase of commercial floorspace;
  - the provision of good quality, flexible commercial space that has been designed to include units of varying scale;
  - job creation
  - active frontage
  - delivery of affordable workspace
  - Optimised use of the site.
78. Some limited weight can be attached to the NSP and OKR AAP at present, given that they have been subject of extensive consultation and the emerging policies would support the proposal. Given the changing character of the area, it is not felt that the introduction of housing would prejudice the operation of existing businesses in the area. Job creation and new housing would be in accordance with the London Plan (2016) requirements for the Old Kent Road Opportunity Area. For these reasons, officers consider that the principle of the proposed development in land use terms should be supported in this instance.

#### **Environmental impact assessment**

79. The applicant did not make a screening request to determine whether an Environmental Impact Assessment (EIA) is required in respect of the proposed development due to the size and scale of the proposed scheme. The proposed development would not constitute EIA development and accordingly does not need to be supported by an Environmental Statement.

#### **Affordable housing**

80. Strategic Policy 6 of the Core Strategy 'Homes for People on Different Incomes' requires at least 35% of the residential units to be affordable. For developments of 15 or more units affordable housing is calculated as a percentage of the habitable rooms

and further information on this can be found in the Council's draft Affordable Housing SPD (2011). All of the affordable units should be provided on site and a mix of housing types and sizes is required. In accordance with Saved Policy 4.5 of the Southwark Plan, for every affordable housing unit which complies with the wheelchair design standards one less affordable habitable room will be required.

81. Saved Policy 4.4 of the Southwark Plan requires a tenure split of 70% social rented to 30% intermediate housing. This is reiterated in the draft Old Kent Road Area Action Plan.
82. In total, 156 habitable rooms would be provided in the development (calculation based on where habitable rooms are greater than 27.5sqm these are counted as two habitable rooms). The development would provide a total of 56 affordable habitable rooms which would equate to an overall provision of 35.8% (rounded up to 36%). The level of provision is therefore acceptable and policy compliant. Viability information has been submitted which supports the delivery of the quantum of affordable housing proposed.
83. A standard policy compliant 35% habitable rooms offer would equate to 54.6 affordable habitable rooms, with 25% social rent at 38.2 habitable rooms, and 10% Intermediate at 16.3 habitable rooms.
84. The proposed 36% habitable rooms offer would meet the split of a standard policy compliant 35% habitable rooms offer with 40 social rent habitable rooms (71%) and 16 Intermediate habitable rooms (29%) as seen in table below:

Number of bedrooms	Affordable tenure		Number of affordable units	Percentage (%)
	Social	Intermediate		
Studio units	0	0	0	0
One bedroom	2	1	3	21
Two bedrooms	3	1	4	29
Three bedrooms	5	2	7	50
<b>Total</b>	<b>10 (71%)</b>	<b>4 (29%)</b>	<b>14</b>	<b>100</b>

85. Overall, the proposal would provide a total of 46 affordable units in a mix of unit sizes A Section 106 agreement is recommended to secure the delivery of these units, including a clause preventing more than 50% of the private units from being occupied until the affordable units have been completed.
86. The proposed development would have one core which would be shared between the private and affordable units. It is a typical requirement from Registered Provider's that affordable units have their own independent access and lift core. The provision of an additional entrance and core to serve affordable homes is not possible without having a detrimental impact on the scheme. The loss of any net area derived by an additional entrance and core for affordable homes would also have an impact on the overall viability of the project and reduce the amount of affordable housing that could be provided.

87. The applicant has approached a Registered Provider (RP), who they are discussing the affordable units with and has confirmed that they would expect the service charge to be evenly apportioned between all of the flats, as per a private scheme, and then the affordable element is paid directly by the RP. The RP then collects rent from the social tenants at the same level irrespective of the service charge. In effect the RP subsidises the additional cost of the service charge for the tenant. This would be secured in the s106 agreement to ensure that there would be no additional cost in rent/service charges for the social tenants as a result.

### **Housing Mix**

88. Core Strategy Strategic Policy 7, 'Family Homes', requires a housing mix of at least 60% dwellings with two or more bedrooms, with 20% having at least three bedrooms. No more than 5% of the units should be studios, and these can only be for private housing. This is reiterated in emerging policy in the draft OKR AAP and the NSP.
89. The proposed housing mix is summarised in the following tables:

<b>Unit Type</b>	<b>Units</b>	<b>Percentage of total number of units</b>
Studio	6	13%
1 bed	16	33%
2 bed	17	35%
3 bed	9	19%
<b>Total</b>	<b>48</b>	<b>100%</b>

90. At 13%, the proportion of studio units exceeds the maximum of 5% permitted. However, the inclusion of a greater number of smaller units is a result of the need to make an efficient use of a small narrow floor plan on such a constrained site. It should also be noted that none of the studio units would be allocated to the affordable tenures.
91. The proposal would also fall short of the other housing policy requirements with 54% of the dwellings having two or more bedrooms and 19% having three bedrooms. For the affordable housing however, the mix is much improved to the policy position, with 79% having two or more bedrooms and 50% having three bedrooms. This affordable mix is welcomed despite the shortfall for the scheme overall, which reflects the challenge of planning a relatively narrow site. There is a need for 4 bedroom units in Old Kent Road. The applicant has explored options to provide larger family sized units (4 bedroom flats), but would result in significantly oversized units and reducing the overall number of affordable habitable rooms. It is therefore not possible to deliver any 4 bed units due to site constraints.
92. Officers consider that the wider benefits of the scheme outlined in this report would outweigh any harm caused by this shortfall in the housing mix.

### Wheelchair accommodation

93. The London Plan Policy 3.8 requires 10% of new housing to be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users. Saved Policy 4.3 of the Southwark Plan support this, requiring 10% of new dwellings

to be suitable for wheelchair users, except where this is not possible due to the physical constraints of the site.

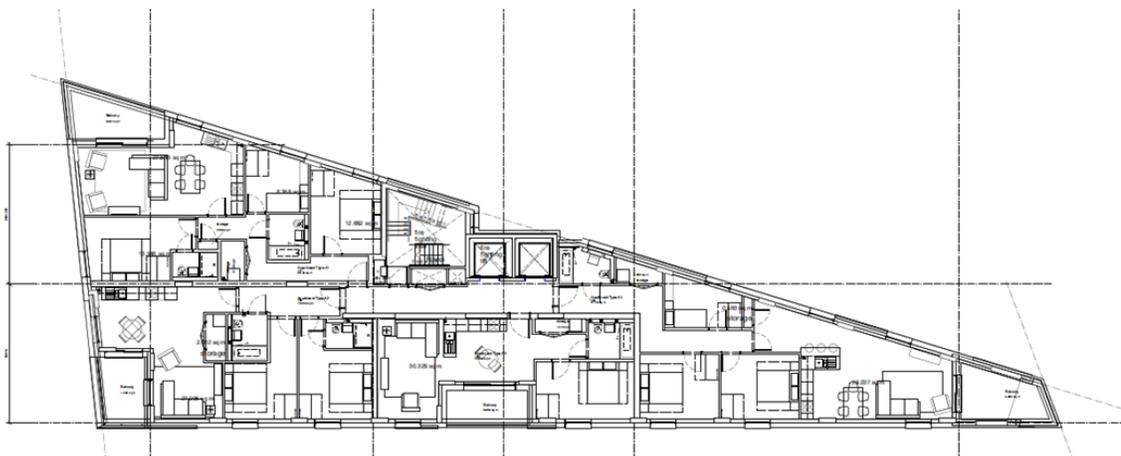
94. Due to the constraints of the shape and size of the site and the limited opportunity to provide off-street wheelchair parking, the suitability of the site for M4(3) wheelchair accessible accommodation is limited, without losing some of the three bedroom units.
95. As such, it is considered appropriate to capture this deficit through a financial contribution. The *Wheelchair accessible housing: Offset fund* requires any shortfall in the required provision of on-site wheelchair housing to be charged at £10,000 per habitable room unit, which totals £130,000 for this scheme.

#### Density

96. 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.
97. As the site is located within the Urban Zone, a density range of 200 to 700 habitable rooms per hectare (HR/Ha) 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 2015.
98. The development as a whole would have a density of 2,478HR/Ha (including the commercial floorspace). Since the maximum upper limit of 700HR/Ha would be significantly exceeded, the development would need to demonstrate that it would be excellent in relation to housing quality. If it can be demonstrated that an excellent standard of accommodation would be provided, makes an exceptional contribution to the regeneration, and the response to context and impact on amenity to existing occupiers is acceptable, then it is 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 paragraphs.

#### Quality of accommodation

99. Saved Policy 4.2 of the Southwark Plan advises that planning permission will be granted provided the proposal achieves good quality living conditions. The standards in relation to internal layout are set out in the adopted Residential Design Standards SPD 2015 and include guidance on overlooking standards as well as requiring the predominance of dual aspect accommodation.



### Aspect

100. The scheme will deliver 36 units (75%) in dual aspect, with only studio and 1 bed units delivered as west facing, single aspect units. No north facing single aspect units are proposed and all of the three bed units would be dual aspect.

### Unit sizes

101. All of the proposed units would satisfy the minimum floor areas set out in Southwark's Residential Design Standards SPD, alongside good floor to ceiling heights and glazing. All kitchen units would be naturally ventilated and lit. Following discussions with the applicant, the open living rooms/kitchens have been amended so that they meet the minimum room standards. Accordingly, this aspect of the scheme overall is also policy compliant.

### Internal daylight within the proposed residential units

102. A daylight and sunlight report and addendum based on the Building Research Establishment (BRE) Guidance has been submitted which considers daylight to the proposed dwellings using the Average Daylight Factor (ADF). ADF is a measure of the overall amount of diffuse daylight within a room. It is the average of the daylight factors across the working plane within a room. ADF determines the natural internal light or daylight 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.
103. A total of 8 no. of the units located across two floors of the development (first and second levels), considered to be the worst-case dwellings in terms of daylight access have been included in the assessment. All habitable rooms (kitchens, living, dining rooms and bedrooms) within these dwellings were assessed. The results indicate that all of the assessed habitable rooms meet the required ADF target set out by the BRE.
104. The analysis demonstrates that daylight amenity within the proposed residential accommodation will be very good and in full accordance with BRE guidance.

### Overlooking

105. The site is some distance from existing and future neighbouring residential buildings being separated from roads and railway line and would therefore not suffer from any overlooking and would have a good level of privacy within the proposed units.

### Amenity and play space

106. 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 10sqm per child bed space (covering a range of age groups). The emerging OKR AAP requires 5sqm of public open space per dwelling as per AAP 10.

107. The following amount of amenity space would need to be provided:

- For units containing 3 or more bedrooms, 10sqm of private amenity space as required by the SPD;
- For units containing 2 bedrooms or less, ideally 10sqm of private amenity space, with the balance added to the communal space;
- 50sqm communal amenity space per block as required by the SPD;
- 10sqm of children's play space for every child space in the development as required by the London Plan;
- 5sqm of public open space per dwelling as required by the OKR AAP. If it is not feasible to deliver the open space on site, a financial contribution will be required.

### Private amenity space

108. In this case, a total of 480sqm of private amenity space would need to be provided between the 48 units. In this instance 340.29sqm of private amenity space is proposed which is short of the required amount. Notwithstanding this, all flats have been provided with private amenity space in the form of balconies with the minimum of 3.1sqm for the studios and a minimum of 5.2sqm for the one bedroom flats. The three bedroom flats which are considered to be family sized units would have a minimum of 9.9sqm and some having the required 10sqm. This is considered acceptable.
109. Where the full recommended provision of 10sqm per residential unit has not been provided, the shortfall has been added to the communal requirement. A provision of 139.71sqm of communal amenity space, plus the minimum of 50sqm would have been required (a total of 189.71sqm). The applicant has proposed a 133sqm communal amenity space at level 12. This means that there is a shortfall of 56.71sqm, which would require a financial contribution of £11,625.55.

### Children's play space

110. 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 163sqm of children's

play space. Revised plans have been submitted to show 30sqm of play space within the communal amenity area, which goes part way to meet this requirement. However a shortfall of 133sqm is recognised, which would require a financial contribution of £20,143.40 and will be secured by Section 106 agreement. This would go towards creating new pocket green park space within Hatcham Road and Ilderton Road area, as part of the OKRAAP masterplan.

111. Further design details of the proposed play space within the scheme will be secured by condition.

#### Public Open Space

112. In addition to the existing amenity space requirements set out above, emerging Policy AAP10 of the draft OKR AAP requires the provision of 5sqm of public open space per dwelling or a financial contribution in lieu. This would equate to 240sqm of public open space for the scheme, but given the small area of the site and the development essentially occupying the whole area of the site, there is limited space available to provide public open space.
113. The applicant has agreed to make the contribution of £49,200 based on the 48 dwellings proposed (at a cost of £205 per sqm as set out in the AAP) and can be secured by the legal agreement.

#### Noise

114. The site is located within the SPIL, and the proposed residential units would adjoin existing commercial units to the north and south, although these sites may come forward with similar mixed schemes. The site to the south has already got resolution to grant planning permission for mixed commercial and housing subject to completion of the s106 agreement. The railway line and associated arches is located immediately to the east of the site. A noise impact assessment has therefore been undertaken to assess whether the site would be suitable for residential development. The report has been reviewed by the Council's Environmental Protection Team (EPT) and a condition to secure appropriate internal noise levels is recommended, which should minimise the likelihood of noise complaints against the existing industrial occupiers. Mitigation measures such as alternative ventilation for all habitable rooms and higher than standard specification glazing have been recommended by the applicants.

#### Conclusion on quality of accommodation

115. The proposed development would provide well lit quality homes that meet the space requirements of the Residential Design Standards SPD. The units would have access to private amenity and communal amenity space and where this is not achieved a contribution is provided to offset the shortfall. Whilst a small number of the units would be single aspect, these are the studios and one bedroom units that overlook Ilderton Road, which would not have any obstructions and have a good outlook. Mitigation measures are proposed to ensure noise impacts from surrounding uses and the railway are limited. The quality of residential accommodation proposed would be high and would justify the high density of the scheme.

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

116. Strategic Policy 13 of the Core Strategy 'High Environmental Standards' seeks to ensure that development sets high standards for reducing air, land, noise and light pollution and avoiding amenity and environmental problems that affect how we enjoy the environment in which we live and work. Saved Policy 3.2 of the Southwark Plan states that permission will not be granted for developments where a loss of amenity, including disturbance from noise, would be caused. The adopted Residential Design Standards SPD expands on policy and sets out guidance for protecting amenity in relation to privacy, daylight and sunlight.

### Daylight and Sunlight impact to existing residential units

117. A daylight and sunlight impact assessment was submitted with the planning application to assess the impact on nearby existing residential properties. The assessment utilised the following methodologies.

### 25 degree line

118. To determine whether a neighbouring existing building may be adversely affected, the initial test provided by the BRE is to establish if any part of the proposal subtends an angle of more than 25° from the lowest window serving the existing building. If this is the case then there may be an adverse effect and a more detailed assessment involving the Vertical Sky Component of the affected window would need to be carried out.

### Vertical Sky Component (VSC)

119. VSC is a measure of the direct skylight reaching a point from an overcast sky. It is the ratio of the illuminance at a point on a given vertical plane to the illuminance at a point on a horizontal plane due to an unobstructed sky. For existing buildings, the BRE guideline is based on the loss of VSC at a point at the centre of a window, on the outer plane of the wall. The BRE guidelines state that if the VSC at the centre of a window is less than 27%, and it is less than 0.8 times its former value (i.e. the proportional reduction is greater than 20%), then the reduction in skylight will be noticeable, and the existing building may be adversely affected.

### Annual Probable Sunlight Hours (APSH)

120. In relation to sunlight, the BRE recommends that the APSH received at a given window in the proposed case should be at least 25% of the total available, including at least 5% in winter. Where the proposed values fall short of these, and the absolute loss is greater than 4%, then the proposed values should not be less than 0.8 times their previous value in each period (i.e. the proportional reductions should not be greater than 20%). The BRE guidelines state that *'...all main living rooms of dwellings, and conservatories, should be checked if they have a window facing within 90 degrees of due south. Kitchens and bedrooms are less important, although care should be taken not to block out too much sun'*. The APSH figures are calculated for each window, and where a room is served by more than one window the contribution of each is accounted for in the overall figures for the room. The acceptability criteria are

applied to overall room based figures.

Overshadowing, sunlight to amenity spaces

121. Open spaces should retain a reasonable amount of sunlight throughout the year. The BRE states that for an amenity space to “appear adequately sunlit throughout the year, at least half of the area should receive at least 2 hours of sunlight on 21 March”. Where this is not achieved, the difference between the area achieving 2 hours of sun on 21 March should be no less than 0.8 times its former value.
122. The neighbouring residential units that have the potential to be impacted in terms of daylight and sunlight are located at:
  - Tustin Estate
  - Manor Grove
  - Canterbury Industrial Estate
  - 313-349 Ilderton Road
123. It should be noted that the applicant has carried out an impact assessment based on speculative future developments at both the Canterbury industrial estate site and the development proposed at 313-349 Ilderton Road. The current uses on the two sites are commercial/industrial and therefore would not normally be required to be tested. The applicant has taken a cautious approach by including future residential developments on these two sites. As the development on the Canterbury Estate is currently only a speculative development the hypothetical massing and window sensor locations have been mirrored from 301 – 303 Ilderton Road. Officers consider this to be an appropriate approach given that the OKR AAP notes that taller buildings could be accommodated on the east side of Ilderton Road.
124. The applicant has not carried out an assessment on the social club to the east of the site as this is behind the railway embankment. Furthermore this is not in residential use and is also separated by an existing car park.
125. The figure below illustrates the location of these existing residential properties that have been assessed:

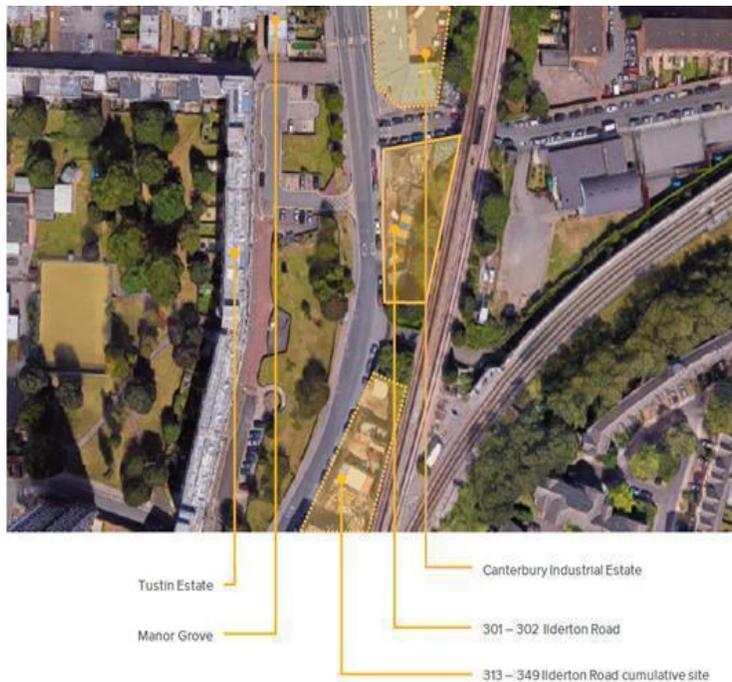


Figure 1: Site location and neighbouring buildings assessed

### Tustin Estate

126. This building is located to the west of the proposed development.

#### Daylight

127. A total of 96 windows were assessed at Tustin Estate. Of these 96 windows, 16 are seen to pass the 25-degree line test, and the remaining 80 windows attain a VSC of 27% or more.

#### Sunlight

128. None of the habitable windows in the Tustin Estate building fronting the site face within 90 degrees of due south and therefore not applicable in this instance.

### Manor Grove

129. This building is located to the north-west of the application site.

#### Daylight

130. The results show that a total of 16 windows from Manor Grove were assessed for daylight access. Whilst none of the windows passed the initial 25-degree line test, all 16 windows are seen to obtain an absolute VSC of 27% or greater.

#### Sunlight

131. Again, no windows face within 90 degrees due south and therefore sunlight is not an

issue.

### Canterbury Industrial Estate

#### Daylight

132. A total of 11 windows from the speculative development were assessed in terms of daylight access.
133. Of these windows, 1 will pass the initial 25-degree line test, 2 are seen to be able to achieve an absolute VSC of at least 27% or more, and 1 window is seen to be able to obtain a relative VSC of at least 0.8 of the existing value.
134. While proportional reductions in VSC for the remaining 7 windows are between and 0.55 (45%) and 0.75 (25%), which is in excess of BRE guidance, retained values remain very good, particularly so for an urban location. All windows will retain VSC values in excess of 20%. In this instance it is recognised that there would be a degree of harm to the daylight amenity of residents, but this harm would be minor and acceptable in an urban location.

#### Sunlight

135. A total of 11 windows were highlighted as facing the development and within 90 degrees of due south. The analysis indicated that of the 11 windows included in the analysis, 1 passed the initial 25-degree line test and 10 windows satisfied the BRE criteria for annual probable sunlight hours (APSH) and winter probable sunlight hours (WPSH). The properties will continue to receive very good sunlight amenity after development.

### 313-349 Ilderton Road

136. This site is to the south and has been given resolution to grant planning permission by the Planning Committee in November 2018.

#### Daylight

137. A total of 22 windows from the proposed development were assessed and 14 passed the initial 25-degree line test and 4 would achieve an absolute VSC of at least 27% or more. The other 4 windows that had less than 27% VSC would have a reduction of not less than 0.8 its former value and therefore any loss would not be noticeable.

#### Sunlight

138. Again, no windows face within 90 degrees due south and therefore sunlight is not an issue.
139. There are no amenity spaces in close proximity to and to the north of the development and therefore an overshadowing assessment was not deemed necessary.

### Conclusion on daylight and sunlight impacts to existing residential units

140. The only noticeable reductions seen would be to the 7 windows in the emerging development at 313-349 Ilderton Road, but as discussed above the retained VSC values are appropriate for such an urban location. Noticeable should not be equated with unacceptable. Overall, the impacts on daylight and sunlight to neighbouring buildings are limited.

### Overlooking

141. In order to prevent harmful overlooking, the Residential Design Standards SPD 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. These distances are all met in terms of the impact of the proposal on adjacent buildings. As such, it is not considered that the proposed development would result in significant loss of privacy.

### Outlook

142. It is considered that the proposed development will provide an improved outlook for nearby residential properties as the scheme would place a site that does not enhance the street townscape and is partly in a poor condition. The proposed development is of sufficient distance from neighbouring residential properties and would therefore not impact on their outlook or appear overbearing.

### Air Quality

143. The site is located in an Air Quality Management Area and an Air Quality Assessment has been submitted, which considers the air quality impacts arising from the construction and use of the development.
144. The Council's Environmental Protection Team (EPT) has reviewed the submission and had requested that the submitted air quality neutral assessment including for transport emissions should also show the building emissions. This has been submitted and EPT is satisfied with the results.

### **Impact of adjoining and nearby uses on occupiers and users of proposed development**

145. The proposed non-residential floorspace would be likely to be more compatible with residential uses than the existing uses. The noise transmission would be controlled by planning conditions, as recommended by the Council's EPT. Overall it is not considered that any of the uses proposed would result in any significant loss of amenity to neighbouring residential occupiers, nor would they hinder the operation of the neighbouring industrial and warehousing units.

### **Transport issues**

146. Core Strategy Strategic Policy 2 encourages walking, cycling and the use of public transport rather than travel by car. Saved policy 5.2 of the Southwark Plan seeks to ensure that developments do not result in adverse highway conditions; 5.3 require that

the needs of pedestrians and cyclists to be considered and 5.6 establish maximum parking standards.

#### Accessibility

147. The site has a PTAL (public transport accessibility level) of 4 (moderate) and is not located in a controlled parking zone (CPZ). There are two bus stops within the vicinity of the site. Old Kent Road forms a signalised junction with Ilderton Road approximately 200m to the south of the site and providing access to further bus services.
148. In recognition of the increased pedestrian activity resulting from the development, pavements in front of the site, on Ilderton Road, will be widened. Ground floor entrances to both the residential and commercial areas have been set back by a metre, in order to create a more generous approach to the residential lobby and commercial units.
149. The removal of much of the business related traffic and illegal parking in the area will improve road safety. The trip generation of vehicles of the proposed development would in fact be reduced compared to the existing uses on site. It is not considered that the proposed development would impact on the local highway network in terms of trip generation.
150. The London Borough of Lewisham has however made a comment that there should be assurances that the route along Hornshay Street to the park at Bridgehouse Meadow will be suitably safe for the increased number of pedestrians and cyclists using this route. Officers acknowledge this, but consider that the number of trips would not be that significant. In any case, as stated below, highways infrastructure improvements would be covered under CIL.
151. As a borough the Council agrees with TfL that bus services will 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. The requirement for TfL to provide evidence to prove both previous contributions has been spent appropriately and the evidence for the further draw is the fairest way this could be managed. The proposal is that there is a maximum cap for TfL to call on which is £2,700 per unit. This will be able to be requested in stages between 3 - 5 years and will be secured by S106.
152. Highways and transport infrastructure requirements are covered under CIL and the public highway improvements in the OKR Action Area would be delivered from a combination of land gain, s278 and CIL.

#### Servicing

153. The residential refuse collections associated will take place from Ilderton Road.
154. A servicing bay has been provided accessed from Hornshay Road and tracking drawings were provided to demonstrate the appropriate sized vehicles can reverse in and exit in forward gear. As stated above, the proposal had included the possible

introduction of loading bays on Ilderton Road and TfL has raised concerns with the reduction of the carriageway.

155. However, following discussions with the applicant and the Council's own Transport team, the widening of the footway has now been omitted from the scheme. The carriageway is no longer reduced. The loading bay originally proposed by the applicant has been removed. It is acknowledged by both the Transport Planning team and the Council's Highways management team that the exact location of any loading bay could be agreed within the S278 agreement. The S278 works will identify possible locations for a loading bay. The site backs onto a network rail access which is rarely used which contains sufficient space for loading off the main carriageway.
156. 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 5000 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.
157. 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 £4,900.00 based on the 48 residential units and 431sqm of non residential floorspace. The applicant has agreed to the contribution which can be collected via the legal agreement.

#### Car parking

158. The site is not located in a designated Controlled Parking Zone and there are large sections of unrestricted on-street parking available on Hornshay Street and Ilderton Road in the immediate vicinity of the site. The western side of Ilderton Road and the northern side of Hornshay Road are subject to double yellow line restrictions.
159. The proposal is car free and does not include any wheelchair units and therefore is not required to provide off street disabled parking. A condition would also ensure that no future residents or occupiers of the proposed development could obtain resident parking permits for any future CPZ.

### Cycle parking

160. A total of 92 cycle parking spaces would be provided on-site, comprising 80 spaces at basement level and 12 short-term spaces at ground floor level within lockable cycle stores. The ground floor store would be shared between commercial and residential visitors which would normally need to be separated.
161. TfL has raised some concerns that the cycle stands may not easily be used by all users. However, Officers consider that conditions securing further details of cycle storage plus the provision of Brompton style cycle hire lockers equivalent to 1 locker per 10% of residential units (10% of which a EV lockers) would be sufficient. The Brompton Lockers offer a flexible cycle hire option to the residents and workers in the development which is mitigation for both cycle parking levels and TfL's request for cycle hire docking station.

### Construction management

162. The submission of a Construction Management Plan would be secured by condition and to be approved by the Council prior to implementation of the development.

### **Design issues**

163. Strategic Policy 12 of the Southwark Core Strategy 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 3.13 of the Southwark Plan asserts that the principles of good urban design must be taken into account in all developments which includes height, scale and massing of buildings, consideration of the local context, its character and townscape as well as the local views and resultant streetscape.
164. The emerging policy in the AAP sets out a vision for the Old Kent Road that would see substantial change in the area over the next twenty years, whilst seeking design that responds well to its existing character and sense of place. There are no conservation areas or listed buildings in the vicinity of the application site.
165. Although the proposal is considered a tall building, it is not considered that this proposal would result in any harm to designated London wide or local protected views, including the Protected Vista of 2A.1 of the London View Management Framework, which protects views from Parliament Hill Summit to St. Paul's Cathedral. This is demonstrated in their townscape and visual impact assessment and the additional wireframe visualisations.

### Height, Scale and Massing

166. 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 acceptable location for tall buildings which optimise housing delivery and regeneration benefits.

167. Due to the requirement to provide a full height commercial floor on the first floor level, the building has been revised and increased by 1 metre. The proposed development takes the form of a single block stepping from 13 storeys on the southern end of the site up to 14 storeys (max 49.3m AOD) to the north on the junction with Hornshay Street. This stepping up is considered appropriate on this junction. It sits below the towers of the Tustin Estate, as stipulated in the AAP. Furthermore, the development immediately to the south of the proposal, at 313-349, is between 11 to 15 storeys high, thus creating a consistent massing height from the site to the Tustin Estate. The form and massing approach is broadly supported by the GLA.
168. It is also noted that the site to the north on Canterbury Industrial Estate is likely to be developed in the future, which may either be of similar height to that proposed in this scheme or potentially taller given the greater size of that site.

#### Site layout

169. The development is a single block, optimising the whole of the site area. The ground floor layout would have main entrances from the Ilderton Road frontage, but would also have active frontage on Hornshay Street with the full double height commercial glazed facade.
170. The eastern side of the ground floor would face the railway embankment and as such is mainly used as the location of servicing for the commercial element. This would be away from the residential entrance on Ilderton Road and is supported.
171. Ground floor entrances to both the residential and commercial areas have been set back by a metre, in order to create a more generous approach to the residential lobby and commercial units.

#### Architectural Design and Materiality

172. The proposed scheme has introduced a design that seeks to reference the historic industrial use of the area. Brick and metal were the materials that were originally proposed with the submission.
173. Officers were originally concerned with the proportion of the building and the response to the Tustin Estate and emerging schemes coming forward to the south. There was a desire to see more verticality in the scheme. Concerns were also raised with the elevations needing to provide more visual interest particularly to the eastern elevation facing the railway line and that comprised a series of metal panels set within brick frames.
174. Following discussions with the applicant, the proposed metal panels would now be replaced with recessed brick panels. These infill panels would be cut bricks laid in dogtooth pattern, The bricks are laid diagonally, in alternating rows with projecting

corners. It is considered that this detailing would be more appropriate for the building proposed, adding articulation and interest to the elevation on all floors. The predominant use of masonry for the whole building is considered acceptable in this location, given the existing context. The emerging scheme to the south is also proposing the use of brick as the predominant material.

175. There are a number of window types proposed and whilst the eastern and western elevations contain the majority of the smaller windows, these are full height and have sufficient window reveals. These punctuating the facade would create shadows and greater articulation in the elevation.
176. In terms of establishing a hierarchy of fenestration, based on use, the smaller window type is the typical one used throughout the building, but there are three other window types of varying widths, relating to room use and the size of the units.
177. In order to create a greater sense of verticality to the elevations, the architects have made some changes. Primary vertical elements have been identified and emphasised in the east and west elevations of the building. The step in the balconies of the west elevation has been removed and the balconies aligned to create a clearly defined primary vertical element on the facade. This in turn would visually split the facade into two distinct elements. Secondary vertical elements have been created throughout the rest of the facades by ensuring a series of rhythmically spaced reserved vertical zones, where the brick runs continuously from the top to the bottom of the building.
178. In order to modulate the height at the top of the building, the logic of splitting the facade using a primary vertical element is pursued in the treatment of the building's crown. This emphasises the distinction between the facade's elements as well as reducing the elevation's aspect ratio.
179. The same approach is achieved on the east elevation where the primary vertical element (in this case the lift and stair core) is emphasised with a slight recess and provides that articulation and depth to the building. This elevation is also important as it is clearly visible from afar and along the railway line.
180. The vertical zone on the western facade continues to the ground floor and aligns with the residential entrance on Ilderton Road. This would increase the legibility of the entrance as it becomes a part of the primary vertical element.
181. Within this simple articulation, the building would have a clear, but subtly differentiated hierarchy of 'base', 'middle' and 'top'. This proposed articulation ensures comfortable proportions and a clear articulation of the mix of uses proposed.
182. The 'base' of the building that includes the ground and first floors is defined by the high floor to floor ceiling heights. This splits the change in function from commercial use to residential uses above and creates a legible commercial frontage with opportunities for signage and activity along the length of the building.
183. Further details on the bricks and external materials and windows could be secured by condition.

### Public realm

184. The proposed building is proposed up to the existing site boundary and the footway on Ilderton Road was proposed to be widened along with tree planting. However, following discussions with the applicant and Transport officers, the footway is re-established to the existing line so the carriageway would not be reduced in width. The precise width of the foot way and the location of any loading bay could be agreed via the S278 process. Doors to the development on the ground floor are also now shown to open inwards. It is acknowledged that the existing condition of Ilderton Road and surrounding streets present a generally poor environment for walking and cycling. The proposals here would provide an improvement to the public realm.

### Conclusion on design

185. The building would be of an appropriate height and scale, with limited harm to protected views and accordingly considered acceptable. The revisions received satisfy Officer's original concerns. The design quality, and use of brick would ensure that a high quality of finish would be achieved. Conditions are recommended in relation to detailed design and material samples.

### **Impact on trees**

186. Saved policy 3.13 of the Southwark Plan requires high quality and appropriately designed streetscape and landscape proposals.
187. The adjacent railway embankment trees can be appropriately pruned as proposed without loss of amenity. Three new trees were proposed to be planted on the new footway, but this would not be feasible due to the restricted width of the footway and is now shown to be removed from the plan drawings. The applicant has agreed however, to pay a contribution of £3000 per tree for planting elsewhere in the OKR AA.

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

188. 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 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.

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

Archaeology: £3,389

Affordable housing monitoring: £6,352

Carbon Offset – Green Fund: £76,140

Delivery and service bond: £4,900

Public open space: £49,200

Trees if not planted: 3,000 per tree (3 No. trees) totalling £9,000

Transport for London Buses: £31,584

Contribution in lieu of Wheelchair accessible housing: £130,000

Contribution in lieu of private / communal amenity space: £11,625.55

Child play space shortfall: £20,143.40

Section 106 admin charge at 2% of total

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

- Affordable housing provisions
- Appointment of workspace co-ordinator
- Affordable workspace – 10% of floorspace at 45sqm
- Terms for the affordable workspace – £12 per sq ft, over a 15 year period
- Jobs, skills and training during construction period (including fall-back financial contribution if targets not met);
- Jobs, skills and training once the proposed development is operational (including fall-back financial contribution if targets not met);
- Highway works – s278 for repaving the footways, remove existing speed humps, highway works including constructing a raised entry table, dropped kerb construction to accommodate refuse collection, amend Traffic Regulation Orders to amend parking arrangements, construct edgings around proposed trees and upgrading of street lighting
- Brompton lockers (10% of units)
- Car club membership for 3 years
- Parking permits exclusion zone for future occupants
- Connection to a future district heating system

191. In the event that an agreement has not been completed by 17<sup>th</sup> September 2019, the Committee is asked to authorise the Director of Planning to refuse permission, if appropriate, for the following reason:

*In the absence of a signed S106 legal agreement there is no mechanism in place to secure adequate provision of affordable housing and mitigation against the adverse impacts of the development through contributions and it would therefore be contrary to 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 Southwark Section 106 Planning*

*Obligations and Community Infrastructure Levy SPD (2015).*

Mayoral and Southwark Community Infrastructure Levy (CIL)

192. 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.
193. In this instance an approximate Mayoral CIL payment of £262,020.00 and an approximate Southwark CIL payment of £897,554.57 would be required. 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**

194. 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. Energy statements should demonstrate how the zero carbon target for residential developments will be met, with at least a 35% on-site reduction beyond Part L 2013 and proposals for making up the shortfall to achieve zero carbon, where required. It should also demonstrate at least a 35% on-site reduction beyond Part L 2013 for non-residential development. An Energy statement and Sustainability Assessment based on the Mayor’s hierarchy have been submitted.

Be lean (use less energy)

195. Energy efficiency measures include a range of passive and active measures such as levels of insulation beyond Building Regulation requirements, low air tightness levels, efficient lighting as well as energy saving controls for space conditioning and lighting. The regulated carbon saving achieved in this step of the Energy Hierarchy is 11.2% over the site wide baseline level.

Be clean (supply energy efficiently)

196. The applicant would not be providing a communal CHP network as it was found not viable for this scale of development and the proposed system for space heating and hot water is communal gas boilers.
197. The site is located within an area where there are plans for the delivery of a district heating network, referred to as “SELCHP” energy system. The GLA has highlighted that connection to the network should be prioritised and evidence of correspondence with the network operator should be provided. Further consideration of a centralised heat pump system should also be undertaken as a back-up plan. However, following further discussions with the GLA, it is accepted that it may not be reasonable or

technically and financially viable to require the installation of alternative low carbon plant once development is completed and occupied.

198. The applicant has committed to connect to SELCHP and it is standard that major developments in parts of the Council would be future-proofed for connection to a future district heating system which would be secured through the S106 agreement.

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

199. A range of low or zero carbon technologies was considered and photovoltaics (PVs) and air source heat pumps were found as suitable technologies for the development. The regulated carbon saving achieved in this step of the Energy Hierarchy is 12.8% over the site wide baseline level. This would not meet the 20% target for Strategic Policy 13 of the Core Strategy, but it is noted that the development is constrained by its small narrow footprint in what can be achieved. The roof area provides communal amenity space and a small children's play area which means utilising the whole roof would not be feasible.
200. Overall, the proposed measures would result in an overall reduction in carbon dioxide emissions when compared to a scheme compliant with the building regulations. Effort has been made to maximise savings at each step of the Energy Hierarchy as far as technically and financially feasible.
201. For the residential element, a 21.9% carbon reduction would be achieved falling short of the minimum 35% requirements (against Part L of the Building Regulations 2013) as set out in policy 5.2 of the London Plan. For the commercial element, a 38.7% reduction in carbon emissions would be achieved. The total savings across the whole site would be 24.0%, amounting to a 42.3 tonne shortfall.
202. In light of the above, contribution towards the council's carbon offset fund would be required. The applicant has agreed to make the contribution of £76,140 to the carbon off set fund which would therefore make this aspect of the scheme fully policy compliant.

#### BREEAM

203. 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. This does not meet the required "Excellent" standard that is required for the commercial element. A pre-fit condition for the commercial workspace to secure an 'Excellent' standard is therefore recommended.

#### Ecology

204. The site in its current condition is of little or no ecological value and therefore its redevelopment offers the opportunity to enhance biodiversity opportunities.
205. The site adjoins a Site of Importance for Nature Conservation (SINC) designated by Lewisham Borough Council. Whilst a full ecological assessment is not required, a preliminary bat roost inspection survey of the site was carried out given that it adjoins

a borough grade SINC.

206. The Council's Ecology Officer has considered the findings and concluded that it was acceptable and no further surveys were required.
207. The Ecology Officer has recommended that a 'green edge' adjacent to the SINC boundary be provided, which would essentially be a buffer between the development and the SINC. A green wall would be considered sufficient and a condition is recommended to secure details. The Ecology Officer has also recommended a condition to secure a biodiverse roof which could be installed under the proposed PV panels to optimise their performance.

### **Other matters**

#### Flood Risk and Water Resources

208. The application site is located within Flood Zone 3, which is considered to be 'High Risk' but does benefit from the Thames tidal defences. The Environment Agency (EA) confirms that their most recent flood modelling (December 2017) shows that the site is not at risk if there was to be a breach in the defences. Therefore, the EA consider that the development will be at low risk of flooding.
209. Although the EA states that an FRA has not been submitted as part of the application, but one has indeed been submitted. The EA has therefore not reviewed any FRA on this site but took a pragmatic approach and do not object to this application.
210. The Council's Flood and Drainage Team has also reviewed the application and notes that developments should seek to limit surface water discharges to the estimated greenfield runoff rate where practical, in line with Southwark's Strategic Flood Risk Assessment and Policy 5.13 of the London Plan. Given that the estimated greenfield runoff rate for this site is relatively low (0.1 to 0.3 l/s), the team are happy to accept the proposed runoff rate of 2.5 l/s. Therefore, no objections are raised to the proposed surface water strategy. As the strategy is indicative only detailed design should aim to achieve the proposed runoff rates and attenuation volume.

#### Archaeology

211. The site is within the 'Bermondsey Lake' Archaeological Priority Zone (APZ) designed to protect the palaeoecological environment and prehistoric archaeology recovered from the shoreline and relict fills of the large late glacial Bermondsey Lake and the associated riverine geology and topology.
212. An archaeological desk-based assessment has been submitted with the application, which has been reviewed by the council's archaeologist. Whilst the Council's archaeologist did not concur with the conclusion of the assessment, it was acknowledged that the precautionary principle should be applied and there is sufficient information to establish that the development is not likely to cause such harm as to justify refusal of planning permission - provided that conditions are applied to any consent securing a programme of archaeological evaluation, mitigation and reporting.

## Contamination

213. The applicant has submitted a site investigation report. The Council's EPT has reviewed this and has recommended a condition to secure an intrusive site investigation and associated risk assessment to be completed to fully characterise the nature and extent of any contamination on the site along with any remediation strategy.

## **Conclusion on planning issues**

214. The proposed development would result in the introduction of residential uses into the SIL and would therefore represent a departure from the adopted development plan. However, the adopted London Plan clearly identifies the Old Kent Road as an opportunity area which will undergo significant transformation with substantial growth including new housing. In advance of emerging policy being adopted, and SIL being formally released, this proposal must be weighed against the wider regeneration benefits of the scheme.
215. The proposed development would potentially increase the numbers of jobs on the site and deliver new housing, including a policy compliant level of affordable housing in terms of habitable rooms. Affordable workspace has also been proposed. Recognising the changing character and uses carried out in the immediate area, it is not felt that any harm to existing businesses would arise by the introduction of housing. In light of this it is considered that the principle of the proposed development should be supported in this instance.
216. The proposal would deliver a good standard of accommodation and would address the majority of standards as set out in the residential design standards.
217. The potential impacts identified are not considered to be significant to adversely impact on neighbouring residents. The existing residents would have adequate outlook, privacy and access to daylight and sunlight.
218. The building height proposed would represent a step change in the existing scale of the area, but as an Opportunity Area site, it is considered that the height proposed would be in accordance with the objectives of the London Plan (2016), in that it would optimise the development potential of the site without harming the character of the surrounding area. The design and materiality is considered to respond well to the existing character and surrounding context.
219. It is therefore recommended that planning permission be granted subject to conditions and the completion of a legal agreement under the terms as set out above, and referral to the Mayor of London.

## **Consultations**

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

## **Consultation replies**

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

### Summary of public consultation responses

222. At the time of writing, a total of 3 No. consultation responses have been received from members of the public.
223. One of them is against the proposed development, one is in favour and one make comments but neither object nor support the proposals. These have been summarised above.

### Summary of responses from external and statutory consultees

## **GLA**

224. The GLA's Stage 1 response considers that the application does not comply with the London Plan and draft new London Plan. The reasons for this, along with Officer responses, are set out below.

### Comment

225. The provision of residential units on this protected industrial site in the Old Kent Road Opportunity Area is not currently supported, in line with London Plan Policies 2.17 and 4.4 and draft London Plan Policy E5. The GLA confirms that non SIL uses within SIL should be refused unless there has been a strategically co-ordinated process of SIL consolidation carried through a Development Plan document review process.

### Officer Response

226. The GLA and the Council have now agreed an approach to phasing the release of protected industrial land for mixed use development in the Old Kent Road Opportunity Area. As noted in the main section of the report the GLA and the Council have worked closely to address these concerns and have agree a potential geography and phasing of SIL release. Members should however note that even with this agreement in place the draft OKR AAP and New Southwark Plan (NSP) would still need to be subject to an EiP and approval of the Secretary of State before they become the adopted development plan position. It should also be noted that there have been a number of objections to the proposed release of industrial land from third parties which would need to be considered at the EiP.

### Comment

227. The GLA note that the proposed development as originally proposed with the mezzanine level would not provide the full replacement light industrial floorspace. It is also lower than its potential industrial capacity. As such, the quantum of industrial floorspace would not accord with draft London Plan Policy E7.

Officer Response:

228. The applicant has since provided a full first floor level with floor to ceiling heights of 4m at both ground and first floor level. This would in effect provide 449sqm of employment floorspace that would be accommodation on two full height floors. This overcomes the GLA concerns and the proposal would re-provide the employment space.

Comment

229. The proposed affordable housing offer at 35% by habitable room, does not meet the GLA's 50% threshold for the Fast Track Route for applications on industrial land and where there is a net loss of employment floorspace; therefore, a financial viability assessment must be provided. The threshold on SIL would be 35% otherwise.

Officer Response:

230. The applicant has now re-provided the employment floorspace and therefore the threshold is 35%. The proposed offer of 36% affordable housing by habitable rooms is considered policy compliant. The Council requires full viability assessment in line with its adopted Development Viability SPD (2016). This has been submitted and reviewed independently on behalf of the council by BPS. BPS has concluded that the scheme is providing the maximum level of affordable housing.

Comment

231. The GLA has made comments on the social rent units rent levels being let at London Affordable Rent.

Officers Response:

232. The details of the affordable housing offer are set out in the submitted Viability Assessment and the Applicant has confirmed that rent levels would not exceed the rent levels set out by the Council for affordable housing.

Comment

233. A total of 165sqm of on-site children playspace is required for this scheme based on the expected child yield. However, no on-site playspace is proposed and suggested that the applicant should consider providing playspace/play elements for the Under 5s within the rooftop amenity space.

Officers Response:

234. The applicant has submitted amended plans to show the provision of door step play equipment on the communal roof amenity space. This is approximately 30sqm, but it is agreed that a s106 financial contribution would secure the shortfall to improve play space elsewhere in the surrounding area.

Comment

235. The GLA notes that the residential density of the proposed development is 2,425 HR/Ha, which exceeds the guidance ranges in the London Plan and the thresholds for increased scrutiny of design quality. However, given the location of the site within the Opportunity Area, the increased density could be supported, but a management plan detailing day-to-day servicing and delivery arrangements and long term maintenance implications be secured by condition.

Officer Response:

236. This is noted and conditions are recommended.

Comment

237. The GLA raises concerns over the proposed widening of the footway. Whilst the aspiration is welcomed, it would narrow the footway significantly and preclude other street improvements and prevent safe two-way operation of buses and HGVs. Some of the doors also open onto the footway, which would be further narrowed by an inset loading bay and would not meet the Mayor's Healthy Streets objectives.

Officers Response

238. The applicant has since removed the loading bay on their ground floor plan and showing the doors opening inwards. As discussed above, the plans have been amended to show the footway returned to its original position and the carriageway would therefore not be reduced in width. The location of any future loading bay could be determined and agreed via the 278 agreement.

Comment

239. The GLA notes that the balconies to the studio units do not comply with the private amenity space standards set out in the Mayor's Housing SPG and considers it could be extended outwards to be flushed with the building line or through rearrangement of the circulation space.

Officers Response:

240. The plans indicate minimum balcony areas of 3.1sqm and are already flushed with the building line.

Comment

241. The GLA highlights that the site falls within the extended background of Protected Vista 2A.1, which protects views from Parliament Hill Summit to St Paul's Cathedral and has not been included in the applicant's townscape and visual impact assessment.

Officers Response:

242. Since the above comment, the applicant has provided visualisations of the scheme

demonstrating its limited impact and has been forwarded to the GLA.

Comment

243. No M4(3) 'wheelchair user dwellings' are proposed and whilst the applicant contends the site's awkward shape and layout prevents the provision of these units, the GLA considers alternative design options be explored to ensure that the scheme fully complies in meeting the London Plan Policy 3.8 and draft London Plan Policy D5.

Officers Response:

244. The applicant has explored options to provide the wheelchair user dwellings by looking at converting the larger 1-bed flat (Type P4) into a M4(3) accessible flat as part of the latest revisions. Unfortunately, the inclusion within the scheme has not been possible. Other options explored would mean reducing the number of three bed units to around 10% of the total mix, which is well below that required by policy. In this instance, the best approach would be to make a financial contribution towards off-site provision for wheelchair flats, in favour of getting as close as possible to the policy's 20% requirement for 3 bed flats.

Comment

245. The GLA has made various comments on the energy statement. The GLA notes that the carbon savings for the domestic element of the development would not meet the targets (the non-domestic element is compliant). The applicant should explore additional measures aimed at achieving further carbon reductions, including maximising the use of PV panels. Further revisions and information relating to cooling and overheating, the ASHP, district heating and energy demand are required.

Officers Response:

246. Since the initial comments, ongoing discussions have been made between the GLA and the applicant. Some points have been accepted and there is commitment to connect to SELCHP.

Comment

247. The GLA did comment that the submitted FRA would not comply with London Plan policies as it does not give appropriate regard to residual flood risks and the need for resilience and emergency planning measures. Other surface water drainage measures should also be reconsidered.

Officers Response:

248. The applicant responded with a note and confirms that the FRA considers these risks. Risks from all sources of flooding have been evaluated within the report. Possible opportunities for flood resilience and emergency planning measures are also indicated. The applicant has also pointed out the maintenance and management of the proposed permeable paving. The GLA has since reviewed this and no objections have been raised.

## Transport for London (TfL)

249. A comment relating to the widening of the footway is repeated in the GLA's formal response above.

### Comment

250. No pedestrian environment reviews has been undertaken and recommends such an audit plus funding toward any deficiencies be secured. Funding for Legible London wayfinding should also be secured.

### Officers Response:

251. In respect to pedestrian and cycling audit, the Council currently have sufficient evidence of walking and cycling in the area and therefore this development was not requested to do this piece of work.

### Comment

252. The majority of the cycle parking is provided in the basement on two-tier racks and are not suitable for all users. Expect to see a good proportion to be provided on Sheffield stands. The ground floor does not provide sufficient cycle parking provision. No audit of cycling infrastructure is provided in support of the application. It is recommended that such an audit, and funding toward any deficiencies highlighted, is secured by the Council. Funding towards a cycle hire docking station should also be sought.

### Officers Response:

253. As discussed in the main section of the report, conditions securing details of cycle parking and Brompton cycle hire lockers are recommended.

### Comment

254. The proposal for a car-free development is welcomed, but this will only be effective with the introduction of a controlled parking zone to which new residents will be made ineligible. It is therefore essential that the Council secure funding for this. There is inadequate provision of accessible parking space.

### Officers Response:

255. Condition to restrict residents obtaining parking permits in any new CPZ is recommended and is considered sufficient in this instance.

### Comment

256. The first phase of development on the Old Kent Road Opportunity Area must be accompanied by public transport improvements in the form of increased bus services. It would be necessary for this sum to be secured through a Section 106 agreement, but it can be paid in stages over five years. The first phase of development of the OA requires significant improvements to the environment for walking and cycling in order to support those modes. TfL has been developing a "Healthy Streets" scheme for

Old Kent Road. While at an early stage, an emerging scheme offers bus priority, walking and cycling improvements. TfL expects a share of that to be funded by the Council. Contributions towards local road bus priority improvements are also sought (bus operational infrastructure and minor station improvements) payable either through a Section 106 agreement or the Council's CIL subject to a funding agreement. TfL would expect the Council to identify and secure funding for pedestrian and cyclist improvements on local roads.

Officers Response:

257. In respect to the request for contributions to the bus services Officers have identified an agreed contribution. Major infrastructure improvements are to be delivered through CIL.

Comment

258. The travel plan does not contain any mode share targets and the measures to support sustainable and active travel modes are particularly poor. A revised Travel Plan could be secured by condition.

Officers Response:

259. Southwark Transport Planning Officers no longer require Travel Plans. The proposed Delivery Service Plan (DSP) bond is considered a more robust approach.

**London borough of Lewisham**

260. No objection in principle to development or the height of the building. The intensified land-use as proposed is in principle supportable in this context and would not impact on residents' amenity. However, would like condition securing high quality materials. A construction management plan should be secured via condition.
261. There is concern that the proposal may result in cumulative adverse impacts with respect to on-street parking supply in the area, which appears to be particularly stressed along Hornshay Street which is narrow. It is noted that the Transport Statement prepared by RGP dated August 2018 implies this will be a car-free development. This is welcome and should be secured by conditions of any planning permission and through an accompanying section 106 agreement. Impacts of the proposal on bus capacity should also be considered.
262. The additional cycle and pedestrian traffic to be generated and likely travelling towards and using the park at Bridgehouse Meadow, approximately 220m north-east of the site along Hornshay Street is a concern. It is recommended that the section 106 agreement presumed to accompany any planning permission granted for the scheme should secure a degree of highway improvements along Hornshay Street towards Bridgehouse Meadow to make passage along Hornshay Street towards Bridgehouse Meadow safer.

**Environment Agency**

263. No objection subject to conditions.

### **Natural England**

264. No comments to make.

### **London Underground Infrastructure Protection**

265. No comments to make

### **Metropolitan Police Designing Out Crime officer**

266. This development is suitable to achieve Secured By Design accreditation and would seek to have a 'Secured by Design' condition for the whole development, attached to any permission that may be granted.

### **Thames Water**

267. The proposed development is located within 15m of a strategic sewer and has recommended a condition on piling. No objections to the scheme.

### **London Fire Brigade**

268. No comments on the specifics of this development.

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

269. 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.

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

271. The Council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights
272. The Council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.

### **Human rights implications**

273. 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.
274. This application has the legitimate aim of providing mixed commercial and residential development. 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**

<b>Background Papers</b>	<b>Held At</b>	<b>Contact</b>
Site history file: TP/2327-301 Application file: 18/AP/2761 Southwark Local Development Framework and Development Plan Documents	Chief Executive's Department 160 Tooley Street London SE1 2QH	Planning enquiries telephone: 020 7525 5403 Planning enquiries email: planning.enquiries@southwark.gov.uk Case officer telephone: 020 7525 5729 Council website: www.southwark.gov.uk

### **APPENDICES**

<b>No.</b>	<b>Title</b>
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>	Wing Lau	
<b>Version</b>	Final	
<b>Dated</b>	07 June 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 / Community Council / Scrutiny Team</b>	7 June 2019	

# APPENDIX 1

## Consultation undertaken

**Site notice date:** 17/09/2018

**Press notice date:** 20/09/2018

**Case officer site visit date:** 17/09/2018

**Neighbour consultation letters sent:** 14/09/2018

### Internal services consulted:

Ecology Officer

Economic Development Team

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

Flood and Drainage Team

HIGHWAY LICENSING

Highway Development Management

Housing Regeneration Initiatives

Waste Management

### Statutory and non-statutory organisations consulted:

EDF Energy

Environment Agency

Greater London Authority

London Borough of Lewisham

London Fire & Emergency Planning Authority

London Underground Limited

Metropolitan Police Service (Designing out Crime)

Natural England - London Region & South East Region

Network Rail (Planning)

Thames Water - Development Planning

Transport for London (referable & non-referable app notifications and pre-apps)

### Neighbour and local groups consulted:

Flat 26 Leybourne House 19 Lovelinch Close SE15 1HL

Flat 79 Heversham House Tustin Estate SE15 1ES

Flat 78 Heversham House Tustin Estate SE15 1ES

Flat 77 Heversham House Tustin Estate SE15 1ES

Flat 82 Heversham House Tustin Estate SE15 1ES

Flat 81 Heversham House Tustin Estate SE15 1ES

Flat 80 Heversham House Tustin Estate SE15 1ES

Flat 76 Heversham House Tustin Estate SE15 1ES

Flat 72 Heversham House Tustin Estate SE15 1EN

Flat 71 Heversham House Tustin Estate SE15 1EN

Flat 70 Heversham House Tustin Estate SE15 1EN

Flat 75 Heversham House Tustin Estate SE15 1ES

Flat 74 Heversham House Tustin Estate SE15 1ES

Flat 42 Heversham House Tustin Estate SE15 1EL

65 Manor Grove London SE15 1EH

63 Manor Grove London SE15 1EH

61 Manor Grove London SE15 1EH

71 Manor Grove London SE15 1EH

69 Manor Grove London SE15 1EH

67 Manor Grove London SE15 1EH

59 Manor Grove London SE15 1EH

51 Manor Grove London SE15 1EH

49 Manor Grove London SE15 1EH

1 Hornshay Street London SE15 1HB

57 Manor Grove London SE15 1EH

55 Manor Grove London SE15 1EH

Flat 73 Heversham House Tustin Estate SE15 1ES  
Flat 92 Heversham House Tustin Estate SE15 1ES  
Flat 91 Heversham House Tustin Estate SE15 1ES  
Flat 90 Heversham House Tustin Estate SE15 1ES  
Flat 95 Heversham House Tustin Estate SE15 1ES  
Flat 94 Heversham House Tustin Estate SE15 1ES  
Flat 93 Heversham House Tustin Estate SE15 1ES  
Flat 89 Heversham House Tustin Estate SE15 1ES  
Flat 85 Heversham House Tustin Estate SE15 1ES  
Flat 84 Heversham House Tustin Estate SE15 1ES  
Flat 83 Heversham House Tustin Estate SE15 1ES  
Flat 88 Heversham House Tustin Estate SE15 1ES  
Flat 87 Heversham House Tustin Estate SE15 1ES  
Flat 86 Heversham House Tustin Estate SE15 1ES  
Flat 69 Heversham House Tustin Estate SE15 1EN  
Flat 52 Heversham House Tustin Estate SE15 1EN  
Flat 51 Heversham House Tustin Estate SE15 1EN  
Flat 50 Heversham House Tustin Estate SE15 1EN  
Flat 55 Heversham House Tustin Estate SE15 1EN  
Flat 54 Heversham House Tustin Estate SE15 1EN

Flat 53 Heversham House Tustin Estate SE15 1EN  
Flat 49 Heversham House Tustin Estate SE15 1EN  
Flat 45 Heversham House Tustin Estate SE15 1EL  
Flat 44 Heversham House Tustin Estate SE15 1EL  
Flat 43 Heversham House Tustin Estate SE15 1EL  
Flat 48 Heversham House Tustin Estate SE15 1EN  
Flat 47 Heversham House Tustin Estate SE15 1EN  
Flat 46 Heversham House Tustin Estate SE15 1EL  
Flat 65 Heversham House Tustin Estate SE15 1EN  
Flat 64 Heversham House Tustin Estate SE15 1EN  
Flat 63 Heversham House Tustin Estate SE15 1EN  
Flat 68 Heversham House Tustin Estate SE15 1EN  
Flat 67 Heversham House Tustin Estate SE15 1EN  
Flat 66 Heversham House Tustin Estate SE15 1EN  
Flat 62 Heversham House Tustin Estate SE15 1EN  
Flat 58 Heversham House Tustin Estate SE15 1EN  
Flat 57 Heversham House Tustin Estate SE15 1EN  
Flat 56 Heversham House Tustin Estate SE15 1EN  
Flat 61 Heversham House Tustin Estate SE15 1EN  
Flat 60 Heversham House Tustin Estate SE15 1EN  
Flat 59 Heversham House Tustin Estate SE15 1EN  
Flat 96 Heversham House Tustin Estate SE15 1ES  
Unit 5 Canterbury Industrial Park SE15 1NP  
Unit 4 Canterbury Industrial Park SE15 1NP  
Unit 2 Canterbury Industrial Park SE15 1NP  
Unit 1 Canterbury Industrial Park SE15 1NP  
Unit 9 Canterbury Industrial Park SE15 1NP  
Unit 12 Canterbury Industrial Park SE15 1NP  
Flat 35 Kentmere House Tustin Estate SE15 1EG  
Flat 34 Kentmere House Tustin Estate SE15 1EG  
Flat 33 Kentmere House Tustin Estate SE15 1EG  
Flat 38 Kentmere House Tustin Estate SE15 1EG  
Flat 37 Kentmere House Tustin Estate SE15 1EG  
Flat 36 Kentmere House Tustin Estate SE15 1EG  
Iberia House Manor Grove SE15 1EQ  
303 Ilderton Road London SE15 1NW  
Unit 6 Canterbury Industrial Park SE15 1NP  
Unit 13 Canterbury Industrial Park SE15 1NP  
Unit 10 Canterbury Industrial Park SE15 1NP  
Unit 3a Canterbury Industrial Park SE15 1NP  
Unit 11 Canterbury Industrial Park SE15 1NP  
Unit 8 Canterbury Industrial Park SE15 1NP  
Flat 27 Kentmere House Tustin Estate SE15 1EG  
Flat 5 Kentmere House Tustin Estate SE15 1EG  
Flat 4 Kentmere House Tustin Estate SE15 1EG  
Flat 3 Kentmere House Tustin Estate SE15 1EG  
Flat 8 Kentmere House Tustin Estate SE15 1EG  
Flat 7 Kentmere House Tustin Estate SE15 1EG  
Flat 6 Kentmere House Tustin Estate SE15 1EG

53 Manor Grove London SE15 1EH  
25 Manor Grove London SE15 1EQ  
23 Manor Grove London SE15 1EQ  
21 Manor Grove London SE15 1EQ  
3 Manor Grove London SE15 1EQ  
29 Manor Grove London SE15 1EQ  
27 Manor Grove London SE15 1EQ  
19 Manor Grove London SE15 1EQ  
11 Manor Grove London SE15 1EQ  
1 Manor Grove London SE15 1EQ  
73 Manor Grove London SE15 1EH  
17 Manor Grove London SE15 1EQ  
15 Manor Grove London SE15 1EQ  
13 Manor Grove London SE15 1EQ  
Arch 57 Ilderton Road SE15 1NW  
321-343 Ilderton Road London SE15 1NW  
349 Ilderton Road London SE15 1NW  
10 Manor Grove London SE15 1SX  
2 Hornshay Street London SE15 1HB  
Pilgrims Way Junior And Infant School Manor Grove SE15 1EF  
8 Manor Grove London SE15 1SX  
12 Manor Grove London SE15 1SX  
6 Barnaby House Manor Grove SE15 1AN  
5 Barnaby House Manor Grove SE15 1AN  
4 Barnaby House Manor Grove SE15 1AN  
9 Barnaby House Manor Grove SE15 1AN  
8 Barnaby House Manor Grove SE15 1AN  
7 Barnaby House Manor Grove SE15 1AN  
3 Barnaby House Manor Grove SE15 1AN  
Living Accommodation 224 Ilderton Road SE15 1NT  
Unit 3b Canterbury Industrial Park SE15 1NW  
313-320 Ilderton Road London SE15 1NW  
2 Barnaby House Manor Grove SE15 1AN  
1 Barnaby House Manor Grove SE15 1AN  
31 Manor Grove London SE15 1EQ  
Flat 25 Heversham House Tustin Estate SE15 1EL  
Flat 24 Heversham House Tustin Estate SE15 1EL  
Flat 23 Heversham House Tustin Estate SE15 1EL  
Flat 28 Heversham House Tustin Estate SE15 1EL  
Flat 27 Heversham House Tustin Estate SE15 1EL  
Flat 26 Heversham House Tustin Estate SE15 1EL  
Flat 22 Heversham House Tustin Estate SE15 1EL  
Flat 7 Heversham House Tustin Estate SE15 1EJ  
Flat 6 Heversham House Tustin Estate SE15 1EJ  
Flat 5 Heversham House Tustin Estate SE15 1EJ  
Flat 21 Heversham House Tustin Estate SE15 1EL  
Flat 9 Heversham House Tustin Estate SE15 1EJ  
Flat 8 Heversham House Tustin Estate SE15 1EJ  
Flat 38 Heversham House Tustin Estate SE15 1EL  
Flat 37 Heversham House Tustin Estate SE15 1EL  
Flat 36 Heversham House Tustin Estate SE15 1EL  
Flat 41 Heversham House Tustin Estate SE15 1EL  
Flat 40 Heversham House Tustin Estate SE15 1EL  
Flat 39 Heversham House Tustin Estate SE15 1EL  
Flat 35 Heversham House Tustin Estate SE15 1EL  
Flat 31 Heversham House Tustin Estate SE15 1EL  
Flat 30 Heversham House Tustin Estate SE15 1EL  
Flat 29 Heversham House Tustin Estate SE15 1EL  
Flat 34 Heversham House Tustin Estate SE15 1EL  
Flat 33 Heversham House Tustin Estate SE15 1EL  
Flat 32 Heversham House Tustin Estate SE15 1EL  
Flat 4 Heversham House Tustin Estate SE15 1EJ  
7 Manor Grove London SE15 1EQ  
5 Manor Grove London SE15 1EQ  
47 Manor Grove London SE15 1EQ  
Flat 1 Heversham House Tustin Estate SE15 1EJ  
301 Ilderton Road London SE15 1NW  
9 Manor Grove London SE15 1EQ  
45 Manor Grove London SE15 1EQ

Flat 2 Kentmere House Tustin Estate SE15 1EG  
Tustin Community Centre 328 Ilderton Road SE15 1NT  
Flat 98 Heversham House Tustin Estate SE15 1ES  
Flat 97 Heversham House Tustin Estate SE15 1ES  
Flat 1 Kentmere House Tustin Estate SE15 1EG  
224 Ilderton Road London SE15 1NT  
Unit 7 Canterbury Industrial Park SE15 1NP  
Flat 23 Kentmere House Tustin Estate SE15 1EG  
Flat 22 Kentmere House Tustin Estate SE15 1EG  
Flat 21 Kentmere House Tustin Estate SE15 1EG  
Flat 26 Kentmere House Tustin Estate SE15 1EG  
Flat 25 Kentmere House Tustin Estate SE15 1EG  
Flat 24 Kentmere House Tustin Estate SE15 1EG  
Flat 20 Kentmere House Tustin Estate SE15 1EG  
Flat 11 Kentmere House Tustin Estate SE15 1EG  
Flat 10 Kentmere House Tustin Estate SE15 1EG  
Flat 9 Kentmere House Tustin Estate SE15 1EG  
Flat 19 Kentmere House Tustin Estate SE15 1EG  
Flat 18 Kentmere House Tustin Estate SE15 1EG  
Flat 17 Kentmere House Tustin Estate SE15 1EG

37 Manor Grove London SE15 1EQ  
35 Manor Grove London SE15 1EQ  
33 Manor Grove London SE15 1EQ  
43 Manor Grove London SE15 1EQ  
41 Manor Grove London SE15 1EQ  
39 Manor Grove London SE15 1EQ  
Flat 19 Heversham House Tustin Estate SE15 1EJ  
Flat 18 Heversham House Tustin Estate SE15 1EJ  
Flat 17 Heversham House Tustin Estate SE15 1EJ  
Flat 3 Heversham House Tustin Estate SE15 1EJ  
Flat 20 Heversham House Tustin Estate SE15 1EJ  
Flat 2 Heversham House Tustin Estate SE15 1EJ  
Flat 16 Heversham House Tustin Estate SE15 1EJ  
Flat 12 Heversham House Tustin Estate SE15 1EJ  
Flat 11 Heversham House Tustin Estate SE15 1EJ  
Flat 10 Heversham House Tustin Estate SE15 1EJ  
Flat 15 Heversham House Tustin Estate SE15 1EJ  
Flat 14 Heversham House Tustin Estate SE15 1EJ  
Flat 13 Heversham House Tustin Estate SE15 1EJ  
126 Crystal Palace Road London SE22 9ER

**Re-consultation: 07/03/2019**

## **APPENDIX 2**

### **Consultation responses received**

#### **Internal services**

Economic Development Team  
Flood and Drainage Team

#### **Statutory and non-statutory organisations**

Environment Agency  
Greater London 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**

Flat 1 Heversham House Tustin Estate SE15 1EJ  
Flat 26 Leybourne House 19 Lovelinch Close SE15 1HL  
126 Crystal Palace Road London SE22 9ER