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Item No.	Classification:	Date:	Meeting Name:
6.1	OPEN	24.6.2021	Planning Committee
Report title:	Development Management planning application: 19/AP/0469: Full Planning Application. Address: 21-23 PARKHOUSE STREET, LONDON, SE5 7TQ Proposal: Demolition of existing building at 21-23 Parkhouse Street and erection of two blocks (Block A and Block B) of 5 and part-7/part-10 storeys. Block A comprises a 5-storey block for commercial/employment use (879sqm) and Block B comprises a part-7/part 10-storey block with ground floor commercial/employment use (111sqm) and 33 residential dwellings, accessible car parking, cycle parking, refuse storage, and associated landscaping.		
Ward(s) or groups affected:	St Giles, Camberwell Green, Faraday		
From:	London Borough of Southwark		
Application Start Date	13.03.2019	PPA Expiry Date	N/A
Earliest Decision Date	01.04.2021		

RECOMMENDATION

1. That planning permission be granted subject to conditions, the applicant entering into an appropriate legal agreement, and referral to the Mayor of London.
2. In the event that the requirements of paragraph 1 above are not met by 31st December 2021, the director of planning be authorised to refuse planning permission, if appropriate, for the reasons set out in paragraph 266.

EXECUTIVE SUMMARY

3. This is a major application which seeks to redevelop a vacant industrial site within to provide a mixed-use commercial and residential development. The application proposes demolition of the existing vacant warehouse building to enable the erection of two new buildings (Blocks A and B).
4. Block A would be a 5 storey block positioned to the front (south) of the site adjacent to Parkhouse Street. This block would provide 879 sqm of commercial floorspace.
5. Block B would be part 7/part 10 storey block positioned towards the rear (north)

of the site near the boundary with Burgess Park. This block would provide 111 sqm of commercial floorspace on the ground floor and 33 new dwellings on the upper floors.

6. The remainder of the site would be landscaped to provide shared amenity space between the two blocks as well as communal and play space facilities on the northern end of the site between Block B and the park boundary. One onsite disabled space would be provided as well as 75 cycle parking spaces.
7. The development would re-provide commercial floor space and deliver 33 dwellings of which 16 dwellings would be affordable (52% affordable by hab room) which is considered to be a positive benefit to the Borough.
8. The site is in a local Preferred Industrial Location as defined in the adopted Development Plan and within a designated site allocation in the emerging plan where re-provision of the same amount of commercial floorspace should form part of any proposal. This application proposes a small reduction of commercial floorspace (99sqm/10% reduction) which has arisen out of the need to meet a number of competing demands. These demands include, the need to maintain an appropriate setback from the boundary of the Burgess Park, the need to provide an appropriate design response in terms of height, scale and mass of the new buildings, the specific design requirements to facilitate light industrial uses and the opportunity to provide good quality homes, and maximising affordable homes delivery.
9. Although there is a 10% reduction in commercial floorspace re-provision, the applicant has proposed 20% of the commercial floorspace be secured as affordable workspace, twice the 10% detailed in draft policy.
10. The proposed buildings are of high quality design, offering robust modern commercial units as well as dwellings which meet and for the majority of units exceed, residential design standards whilst responding positively to the surrounding context and character of the area.
11. Whilst there would be some less than substantial harm to the setting of heritage assets (listed buildings in Burgess Park), this is considered to be outweighed by the benefits arising from the proposal including an increase in jobs at the site, high quality new commercial floorspace, and new housing including affordable housing.
12. There would not be significant harm to neighbouring amenity. It should be noted that there would be no harm to the amenity of existing neighbours and the impact on residents within emerging schemes would be typical of that found within new developments of this nature. Furthermore the relationship that will exist between the new developments if built out as currently proposed will be reflective of that created by the other schemes coming forward in this street.
13. The development would satisfactorily address transport and sustainability policies.
14. The impact on the ecology of Burgess Park Site of Importance for Nature Conservation (SINC) has been fully considered. Officers are satisfied that the

proposal would not give rise to unacceptable impacts by way of noise, disturbance, overshadowing or light pollution. There would be no noticeable harm to protected species subject to conditions to secure the detailed design of balconies and appropriate lighting. Furthermore the proposed ecological mitigation in terms of planting will enhance opportunities for biodiversity on site.

15. Subject to the appropriate mitigation secured by the recommended conditions and s106 obligations set out below, the proposal is now considered to be acceptable for the reasons discussed in this report.

BACKGROUND INFORMATION

Site location and description

16. The site is on the north side of Parkhouse Street close to the junction with Southampton Way. The 0.13ha site forms part of the Burgess Business Park and is currently occupied by a large vacant warehouse formerly in use for light industrial and office purposes. The most recent use of the existing building is assumed to be B1(c). The Council acquired the building in April 2015, and the building has not been in use for employment purposes since this date. The remainder of the site is given over to hardstanding. There is an existing electrical substation on site which must be re-provided as part of the new development.



Image: Site location plan



Image: Existing site aerial photograph

17. The site is bounded by Burgess Park to the north, Parkhouse Street to the South and industrial sites to the east and west. Parkhouse Street is a designated Preferred Industrial Location (PIL). There are a number of employment and industrial uses within the immediate area with development largely comprising two storey industrial warehouses. Beyond the business park the surroundings are predominantly residential comprising a mix of historic density terraced dwellings and more modern medium rise flatted developments. The nearest residential properties are located 26m to the west of the site at 1-13 Parkhouse Street.
18. Burgess Park is one of the borough's largest and most significant parks. It is designated MOL and the area of woodland immediately adjacent to the site is a protected Site of Importance for Nature Conservation (SINC).
19. The site is covered by the following planning designations:-
 - Urban Density Zone
 - Flood Zone 3 (with the benefit of flood defences along the River Thames)
 - Parkhouse Street PIL
 - Air Quality Management Area
 - East Camberwell CPZ
 - PTAL 2/4
 - There are a number of listed buildings/structures to the north of the site (Grade II Listed Lime Kiln in Burgess Park/Grade II Listed Former St Georges Church and Grade II Listed Groundwork Trust Offices)
 - The site is not within a Conservation Area.
 - The site lies within the NSP22 'Burgess Business Park' site allocation.
20. There are a number of sites within the Burgess Business Park site allocation

coming forward for redevelopment (full details are set out in the history section below).

Details of proposal

21. As stated above, the application proposes a commercial led mixed use redevelopment of the site comprising two blocks. The development would deliver a total of 990 sqm of commercial floorspace and 33 residential dwellings of which 16 would be affordable (social rent).
22. Block A would be the commercial one and located towards the front of the site onto Parkhouse Street. This 5 storey block would accommodate commercial units on all levels. Due to the commercial floor to ceiling heights the building would be the equivalent of 6 storeys in height (23.3m to parapet/24.7m top of plant). This block would be constructed of white brick with red/brown metal fenestration.
23. The taller mixed use block (Block B) would be located to the rear, northern edge of the site. The block has been designed as a part 7/part 10 storey block stepping up in height towards the eastern side of the site to reduce the impact on the communal landscaped route running along the western boundary of the site. The tallest element would measure 38.9m being the plant enclosure but the building would be seen at a lower parapet level of 36.9m. The seven storey part would be constructed of white brick and the taller, 10 storey element in red/buff bricks both with red/brown metal fenestration, balustrading for the balconies and cladding details.
24. The main vehicular and pedestrian access runs along the western edge of the site, as a generous shared space. The access leads to a central landscaped courtyard which features a number of new trees to soften the environment. The route also provides pedestrian access to the rear of the site, where shared communal amenity and play space is proposed.
25. The proposals are designed on the basis of delivering a car-free development except for the provision of one wheelchair car parking space, limiting the number of vehicles that will enter and exit the central courtyard space.
26. A total of 75 cycle parking spaces would be provided in dedicated stores for both the residential and commercial uses.

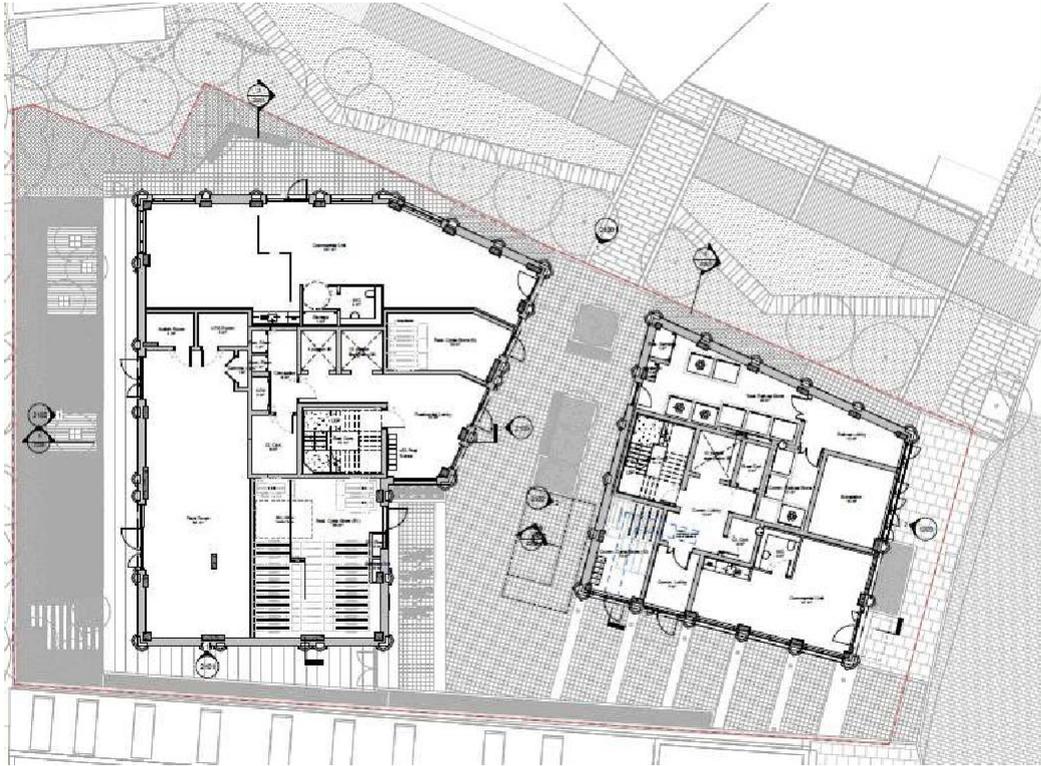


Image – Proposed ground floor layout



Image: CGI view of proposed scheme

Amendments to the application

27. The scheme has evolved since submission in response to comments from members of the public and those of planning officers.
28. In order to address issues raised revised and additional plans and documents were submitted in March 2020 and then again in March 2021. The most recent post submission amendments were submitted in respect of the following matters:
- All of the light industrial floorspace to be B1c (now Use Class E)
 - Design amendments to commercial floorspace (ground floor layouts and floor to ceiling heights to accommodate B1c use)
 - Marginal increase in height of both blocks (circa 3m) to accommodate required floor to ceiling heights for the B1c space
 - Changes to the footprint of both blocks making Block A slightly smaller and moving Block B (and its balconies) so it would be 5m from Burgess Park
 - Reduction in commercial floorspace (99 sqm reduction) as a result of reducing the footprint of the blocks
 - 20 percent commercial floorspace to be provided as affordable workspace (to mitigate the overall reduction in commercial floorspace)
 - Minor design amendments to elevations (balconies, brick treatment, substation)
 - Removal of loading bay on Parkhouse Street
 - Improvements to the landscaping scheme and amenity spaces
 - Revisions to the cycle parking strategy in terms of storage space design, style, and layout

Comments from members of the public and local groups

29. Letters were sent to local residents when the application was first received in April 2019, at this time the application was advertised in the local press and site notices were erected. Following the submission of revised/additional information in March 2020 members of the public were notified as they were after the submission of the final set of amendments in March 2021, each time inviting comments.
30. A total of 80 representations have been received including objections from Friends of Burgess Park, Wells Way Residents Association, Camberwell Society and The Green Party. In total there were five letters of support, two neutral and 73 objections. The comments have been summarised in the table below.

Objections	Officer Response
Harm to ecology in the adjacent park/SINC	Robust ecology assessments have been submitted to demonstrate the impact of the development on the adjacent SINC. In addition in response to concerns raised by FOBP a cumulative assessment of the impacts of this and neighbouring schemes was commissioned by officers. Significant

	<p>harm would not arise by way of overshadowing, light pollution, noise or disturbance subject to the recommended conditions to control the development in detail. Notwithstanding this, appropriate mitigation has been secured to mitigate any adverse impact on the SINC. Furthermore, the redevelopment would deliver opportunities for significant enhancements to ecology/biodiversity onsite through the detailed landscaping strategy which will include appropriate plant species and ecology features.</p>
<p>A 5m set back from the park is not sufficient for a 10 storey building</p>	<p>The 5m set back is acceptable and was the result of extensive discussions with Design, Ecology and Parks Officers. Relevant technical reports have been submitted to demonstrate the impact of the development in terms of ecology, trees and daylight/sunlight. The setback together with appropriate landscaping on the boundary, sensitive lighting to the building, appropriate architectural treatment to the building and balconies will result in a development which would not have a significant adverse impact on the adjacent park or SINC.</p>
<p>Impact on Grade II St George Church which is a designated heritage asset.</p>	<p>A full assessment of the impact of the development on heritage assets including the church has been undertaken. For the reasons set out in the report the harm would be less than substantial and would be outweighed by the public benefits of the scheme.</p>
<p>The height and scale of development being too great and its impact on the park.</p> <p>The height has increased</p>	<p>This proposal and others on Parkhouse Street, if approved would change the views from the park. These views are not protected and it is common to see buildings in views from parks in London.</p> <p>For the reasons set out in this report the height, scale and mass of the development is appropriate for this location.</p>

	<p>The site lies within a location identified for regeneration and intensified use to deliver much needed housing and employment floorspace. As such there is a plan led approach to higher density development being delivered. This proposal reflects the plan led approach set out in the London and Southwark development plans.</p>
<p>The site is not designated for tall buildings and the design is not exemplary.</p>	<p>Whilst not identified as a tall building site in current development plan policies, the emerging NSP site allocation does suggest that tall buildings may be appropriate. The tallest block on this site would be 38m high, in the emerging context the buildings on this site will be reflective of the buildings in the wider Burgess Business Park. For the reasons set out in this report the height/scale of buildings are considered to be appropriate.</p> <p>In terms of design the proposal would deliver high quality buildings set in a hard and soft landscaped environment which is appropriate to the mixed use of the site. The residential units would meet and in some cases exceed residential standards and would offer a very good standard of amenity. Overall the development is considered to meet exemplary standards.</p>
<p>Any development on this site should be at the southern edge adjacent to Parkhouse Street. The land on the site adjacent to the park should be used for open/play space.</p>	<p>The development has been designed with two blocks located centrally within the site boundary with areas of hard and soft landscape on all sides. Revisions to the design were sought to improve the relationship with the park. Block B has been set back 5m from the boundary with the park. The open space between the block and the boundary will accommodate communal gardens and the 0-4 playspace.</p>
<p>The increased density in this area will put more pressure on use of the park.</p>	<p>For the reasons set out in this report</p>

<p>There is no onsite provision for 5+ playspace which will put pressure on existing facilities.</p> <p>Lots of the facilities within Burgess Park are not free, they need to be paid for which is not accurately reflected in the document submitted with this application.</p>	<p>the proposed density is appropriate for this location. The recently adopted London Plan and the emerging NSP policies focus more upon successful design to optimise developments rather than setting numerical targets.</p> <p>The development will deliver high quality dwellings and commercial units as well as onsite play space for 0-4 year olds.</p> <p>Given the location of the site it is appropriate to rely on off-site playspace provision for 5+ year olds. Development plan policies allow for this subject to appropriate financial contributions towards off-site facilities. The applicant has agreed to a financial contribution in accordance with adopted policies.</p> <p>It is open for anybody to participate in paid facilities within the park, this is not limited to existing local residents.</p>
<p>Impact on carbon emissions</p>	<p>As set out in the sustainability section of this report the development has been designed to minimise the use of energy, water and materials. An energy strategy has been developed in accordance with the Mayor's energy hierarchy. The proposal would achieve zero carbon targets through a combination of onsite carbon reductions and an offset payment for the shortfall. The technical reports submitted to address sustainability have been reviewed and found to be robust.</p>
<p>The development fall below the required Urban Greening Factor (UGF)</p>	<p>There is no standard for mixed used developments. Nevertheless this development maximises its UGF meets the residential target of 0.4</p>
<p>Transport impacts including car parking and impact on local bus capacity.</p>	<p>All new development is required to limit on-site car parking and maximise sustainable modes of transport. When</p>

	<p>assessing appropriate car parking levels and the impact on existing infrastructure it is necessary to have regard to future planned transport networks as well as existing. There are planned improvements to transport infrastructure in this area.</p> <p>A car free development (save for one disabled space) is deemed to be appropriate for this location in accordance with adopted policies. Future occupiers will not be able to obtain parking permits so will not put any additional pressure on the road network.</p> <p>It is however recognised that it will be necessary for the development to address the additional demand that will be created by virtue of travel plans incentives, and financial contributions towards improvements to buses and cycle facilities.</p>
<p>There are concerns about whether there are appropriate amenities for future residents (schools/doctors/shops etc...)</p>	<p>The provision of additional infrastructure and community facilities is key to the plan led approach of delivering growth in the borough. The council recognise the need for a significant number of new homes but also employment opportunities and infrastructure and community facilities to support additional housing. This is reflected in development plan policies and infrastructure plans for the borough.</p> <p>New developments are subject to the payment of Community Infrastructure Levy which is used to fund additional infrastructure in the borough in addition to any site specific obligations to mitigate the impact of the development.</p> <p>This development will be subject to the Community Infrastructure Levy as well</p>

	<p>as a range of financial obligations as set out in the relevant sections of this report.</p>
<p>Impact of construction- potential damage to building/roads and environmental effects.</p>	<p>There is no evidence to suggest that neighbouring buildings would be damaged during the construction phase of this development.</p> <p>The development will be subject to detailed construction management plans that will identify transport and environmental effects arising from the construction phase. The plans will set out measures to manage the process and to minimise harm. Such reports will also identify any necessary mitigation.</p>
<p>No requirement for commercial floorspace.</p>	<p>The Council's evidence base suggests that there is a continued need for additional commercial floorspace in the Borough. The commercial units on this site have been designed to accommodate light industrial uses rather than offices in line with the site allocation and development plan policy requirements.</p> <p>The commercial spaces have been designed to deliver high quality flexible spaces which will be attractive to a range of small and medium sized businesses. Conditions are recommended regarding suitable fit-out for the commercial spaces as this can often be a barrier to securing occupation. Furthermore 20% of the commercial floorspace will be secured as affordable workspace offering a significant discount to those meeting eligibility criteria.</p>
<p>The council needs to provide more employment opportunities for residents, existing industrial sites should be protected.</p>	<p>Whilst this application would result a slight reduction in commercial floorspace this site has been vacant for a considerable period of time and as such the redevelopment will provide</p>

	<p>the opportunity for additional jobs compared to the current situation and more jobs than the last known use.</p> <p>Subject to the measures set out in this report (commercial fit out/affordable workspace provision/removal of PD rights to change the use of the commercial units) officers consider that this development would enhance long term employment opportunities for the borough.</p>
The revised proposal results in a loss of commercial floorspace	This is mitigated by way of more affordable workspace as well as a contribution towards loss of employment floorspace
This development needs to be considered in context with all the other developments in Parkhouse Street	Whilst individual applications are assessed on their merits and determined as standalone developments full regard has been given to the planned redevelopment of Burgess Business Park in its entirety. The site lies within an allocated site for mixed use redevelopment (NSP22) and as such a plan led approach has been taken to whole scale redevelopment in this area. Furthermore in assessing the acceptability of this application there has been an analysis of the potential cumulative impacts in terms of design, transport, ecology and other technical matters.
Impact on amenity from overlooking	Having regard to the orientation of the buildings and the distance that will be retained between the application site and existing residential dwellings to the west it is not considered that an unacceptable level of harm would arise.
The development will rely on mechanical ventilation and cooling	The development has been designed to maximise natural ventilation and cooling through passive design as much as possible. There is a need to balance natural ventilation, daylight, noise and air quality considerations. It is proposed to include some mechanical ventilation and cooling but this is considered to be acceptable for

	the reasons discussed below.
There will be inadequate light to properties in neighbouring schemes	Assessments have been submitted to demonstrate the impact according to BRE guidance. The impact is considered to be acceptable for the reasons set out in the report below
Lack of affordable housing	This development will provide a policy compliant level of affordable housing (52% compared to the policy requirement of 50%)
There are concerns over the transparency of this application being made by the council	The Council as landowner must apply for planning permission in the same way as any other Developer and is the way development by local authorities are made across the country.
Lack of viability information	<p>This application proposes a policy compliant level of affordable housing with no grant subsidy.</p> <p>The London Plan allows for policy compliant schemes to follow a fast track route whereby a full financial viability assessment is not required.</p> <p>A financial viability summary has been provided to demonstrate that the scheme is deliverable.</p> <p>In accordance with policies a clause will be secured in the legal agreement requiring a full viability review if the development is not built out within 2 years of planning permission being granted.</p>
The amendments do not overcome previous objections and the harm that will be created by this development is not outweighed by the benefits.	<p>The principle of the development has been supported by officers since the original application was submitted in accordance with the planed regeneration of this area as set out in the NSP.</p> <p>Improvements/amendments were sought following the initial round of consultation in order to address design issues, to improve the relationship with the park and to address technical</p>

	<p>matters such as highways and sustainability. The revised proposals are considered to address previous concerns. The public benefits that will be delivered as a result of the proposal are considered to outweigh any limited harm that may arise in terms of impact on the adjacent park, nearby heritage assets or ecology of the SINC</p>
Comments in Support	
<p>Comments of support acknowledged the benefits of providing much needed housing and commercial units but did express concerns over the height.</p>	

Planning history of the site, and adjoining or nearby sites.

31. There is no relevant history relating to the industrial use of the site.
32. An application was submitted in 2017 (17/AP/1723) for a mixed use redevelopment of the site proposing a similar quantum of development to the current application, within two blocks. This application was withdrawn for revisions to the massing and to address other matters.

Adjoining sites

33. There are live applications the Council is currently considering for the following proposals also on Parkhouse Street.
34. 25-33 Parkhouse Street – 20/AP/0858
The redevelopment of the site to provide a mixed-use development comprising buildings up to 11 storeys in height and accommodating new homes (Use Class C3) and commercial floorspace (Use Class B1c), car parking, cycle parking and associated landscaping.
Status – Pending Consideration
35. 35-39 Parkhouse Street - 19/AP/2011
Demolition of existing buildings and construction of a mixed use building ranging from six to 10 storeys in height (35.15m AOD) comprising 100 residential units (Use Class C3) and 1,323 sqm (GIA) of Class B1/B2/B8 floorspace) with associated car parking, landscaping and other associated works.
Status - Pending Consideration
36. Also of relevance is the history relating to the largest site within the Burgess Business Park Site Allocation (Burgess Industrial Park). This site covers a large area on the southern side of Parkhouse Street as well as 15-19 Parkhouse Street which adjoins this site to the east.
37. Burgess Business Park - 17/AP/4797
Demolition of the existing buildings and redevelopment of the site to provide 499

residential units, up to 3,725sqm (GIA) of Class B1 commercial floorspace, up to 128 sqm (GIA) of Class D2 leisure floorspace and up to 551sqm of Class A1-A3 floorspace within 13 blocks of between 2-12 storeys, with car and cycle parking and associated hard and soft landscaping.

38. Application refused on 31.01.2019. Refusal reasons related to excessive density, poor standards of amenity for future occupiers and loss of employment floorspace.
39. Appeal Dismissed by Secretary of State on 29.04.2020. Reasons related to density and quality of accommodation to be provided, design (site layout/massing and public realm) and impact on amenity for neighbours. It is important to note that the Inspector did not object to the reduction in commercial floorspace to be provided on the site and felt that this could be addressed across the site allocation as a whole by way of each application making appropriate re-provision.
40. A recent application has been submitted for this site. Application 21/AP/1342 for Demolition of the existing buildings and redevelopment of the site to provide 386 residential units (Class C3), up to 4,410sqm of flexible commercial floorspace (Class E) and 112sqm of community floorspace (Class F) within 12 blocks of between 2-12 storeys (max AOD height 48.25m), with car and cycle parking and associated hard and soft landscaping and public realm improvements. Application valid from 19.05.2021
Status – pending consideration

KEY ISSUES FOR CONSIDERATION

Summary of main issues

41. The main issues to be considered in respect of this application are:
 - Principle of the proposed development in terms of land use;
 - Affordable workspace
 - Environmental impact assessment
 - Housing mix, density and residential quality
 - Affordable housing
 - Amenity space and children's play space
 - Design, including layout, building heights, landscaping and ecology;
 - Heritage considerations
 - Archaeology
 - Impact of proposed development on amenity of adjoining occupiers and surrounding area, including privacy, daylight and sunlight
 - Transport and highways, including servicing, car parking and cycle parking
 - Environmental matters, including construction management, flooding and air quality
 - Energy and sustainability, including carbon emission reduction
 - Ecology and biodiversity
 - Planning obligations (S.106 undertaking or agreement)
 - Community impact, equalities assessment and human rights

42. These matters are discussed in detail in the 'Assessment' section of this report.

Legal context

43. Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise. In this instance the development plan comprises the London Plan 2021, the Core Strategy 2011, and the Saved Southwark Plan 2007. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires decision-makers determining planning applications for development within Conservation Areas to pay special attention to the desirability of preserving or enhancing the character or appearance of that area. Section 66 of the Act also requires the Authority to pay special regard to the desirability of preserving listed buildings and their setting or any features of special architectural or historic interest which they possess.
44. There are also specific statutory duties in respect of the Public Sector Equalities Duty which are highlighted in the relevant sections below and in the overall assessment at the end of the report.

Planning policy

45. The statutory development plans for the Borough comprise the London Plan 2021, Southwark Core Strategy 2011, and saved policies from The Southwark Plan (2007 - July). The National Planning Policy Framework (2019) and emerging policies constitute material considerations but are not part of the statutory development plan. A list of policies which are relevant to this application is provided at *Appendix 1*. Any policies which are particularly relevant to the consideration of this application are highlighted in the report.
46. The site lies within the NSP22 'Burgess Business Park' site allocation. The allocation encompasses a number of different industrial sites, many of which are coming forward for redevelopment. NSP22 requires redevelopment proposals to provide at least the amount of employment floorspace (B class) currently on the site or provide at least 50% of the development as employment floorspace whichever is greater. Development should provide industrial uses and where appropriate ground floor retail for active frontage. In addition to this the policy requires the provision of new homes, enhanced permeability and public realm.

Other relevant guidance

47. The Council recently commissioned a Local Development Study (LDS). The purpose of this Parkhouse Street LDS, is to promote a design strategy for development for the Parkhouse Street area in order to co-ordinate developer activities and encourage a cohesive proposal across landownerships. Currently, there are 5 landowners known to be drawing up proposals for sites located within the Parkhouse Street Composite Site, and timescales are broadly in parallel so this is a unique opportunity to address wider and shared objectives and thereby affect a co-ordinated approach to development in the area.

48. The LDS sets out a strategic response to the Planning policy guidance that exists and is to be used as the basis for a discussion between the landowners. It should be noted that the LDS in itself has no statutory Planning status; it is, however, an agreed reference point for a cohesive design approach. Relevant to this particular application is the principle of a mixed use redevelopment, maintaining an appropriate buffer to Burgess Park and a consistent shoulder height along the Parkhouse Street frontage, the mix of uses, and public realm improvements to Parkhouse Street.

ASSESSMENT

Principle of the proposed development in terms of land use including departure from policies to protect Preferred Industrial Location (PIL)

Commercial uses

49. Promoting the economy and creating employment opportunities is key priority for the planning system. This site is designated as a Preferred Industrial Location (PIL) under Saved Policy 1.2 of the Southwark Plan. This designation and saved policy forms part of the current development plan and is therefore applicable to the assessment of this application. Policy 1.2 states that planning permission will only be granted for developments falling within the B Use Class, and sui generis use class industries which are inappropriate in residential areas. As such a mixed use redevelopment of this site is contrary to Policy 1.2. However, the recently adopted London Plan is also part of the current development plan and as a more up-to-date policy document the London Plan should be given significant weight. Furthermore emerging policies are also a material consideration. As discussed below the approach to managing industrial land and development opportunities for designated industrial sites has changed significantly since adoption of the Saved Southwark Policies. For the reasons set out below officers consider a mixed use redevelopment to be appropriate and acceptable in principle, contrary to Saved Policy 1.2 but in accordance with London Plan and emerging NSP Policies.
50. London Plan Policy GG5 requires local planning authorities to plan for sufficient employment and industrial spaces to support economic growth. London Plan Policy E2 deals specifically with the provision of B Use Class space. When dealing with the redevelopment of existing employment sites the policy seeks to ensure that an equivalent amount of B Use Class business space is re-provided in the proposal which is appropriate in terms of type, use and size, incorporating existing businesses where possible, and includes affordable workspace where appropriate. London Plan Policy E4 sets out the approach for managing various types of industrial land/premises to ensure sufficient capacity and identifies 3 main categories (strategic, local and non-designated). Policy E6 requires LPAs to designate Locally Significant Industrial Site (LSIS) and seeks to protect industrial uses. Within the current Southwark development plan this site would be classified

as a protected site under Policy E6 due to its PIL designation. However, this site has not been designated as a LSIS in the NSP but is subject to a site allocation for mixed use redevelopment. Policy E7 facilitates the mixed use redevelopment of industrial sites if designated within a local plan.

51. Policy E7 of the London Plan seeks to intensify industrial use whilst facilitating co-existing uses such as residential, the policy requires mixed use redevelopment proposals to demonstrate that industrial uses will not be compromised by introducing residential uses, that industrial uses are made available for occupation before any residential uses on site and that the design is appropriate to ensure the continued commercial use whilst protecting residential amenity. The detailed design of the buildings and open spaces within mixed use sites is critical to the success of different uses co-existing.
52. Strategic Policy 10 of the core strategy identifies Parkhouse Street as an industrial site which should be afforded protection and as mentioned above the site is protected as a PIL under saved Policy 1.2. However, emerging policies in the NSP propose that PILs will transition to mixed use neighbourhoods. This shift in policy direction seeks to ensure that mixed use developments come forward to ensure effective delivery of much need employment opportunities and housing. The site lies within Camberwell Area Vision (AV.05) which identifies the need for new housing and employment to be delivered within Camberwell with Parkhouse Street suggested as a place for developing small flexible employment spaces.
53. This site forms part of the Burgess Business Park Site Allocation NSP22 which clearly identifies the site as appropriate for mixed use redevelopment. Whilst recognising the benefits of mixed use developments, the allocation does require total re-provision of existing employment floorspace (or at least 50% of employment floorspace whichever is greater) to be delivered as part of any redevelopment. The site designation seeks to regenerate a poorly performing industrial site by intensifying its use whilst at the same time facilitating suitable co-existing uses such as residential. This accords with London Plan Policy E7.
54. As part of the evidence base to support the above policies the Council has published the Old Kent Road Workspace Demand Study (May 2019). This report prepared by Avison Young and Architecture 00 considers the future workspace demand on Old Kent Road. It primarily focuses on the Old Kent Road area, but divides this into sub-areas, one of which is Parkhouse Street. In relation to Parkhouse Street, the Study explains that higher and medium density employment uses are envisaged within area alongside residential uses as part of mixed-use development. It suggests that space should have an appropriate yard area, benefit from an employment plinth, and include an affordable element to complement the area's connectivity and presence close to other creative and light industrial uses within Camberwell and along both Walworth Road and Old Kent Road.
55. As part of the design development the applicants sought specialist input from Southwark Studios to ascertain the most appropriate potential uses for the site. As a result of this, the site is regarded as particularly suitable to provide 'grow-on space' for existing local SME businesses in the area. Southwark Studios have commented on the suitability of the space for the local area and the site, taking into account the user demands of potential occupiers and designing these into

the employment space.

56. As originally submitted this application proposed complete re-provision on site of 1089 sqm of employment floorspace. However, as a result of the proximity of the site to the adjacent protected SINC it was agreed that a 'no build' buffer to the park edge of minimum 5m would be provided. To allow for this it has been necessary to re-design the scheme so that Block B can be pulled away from the shared boundary with the park.
57. In addition to the park setback, in order to ensure that the new commercial floorspace can be occupied as B1c commercial space, it has been necessary to re-design the buildings with greater floor to ceiling heights. This has resulted in a minor increase in height of each of the blocks (circa 3m). An important urban design principle for the sites coming forward within Parkhouse Street is the desire to maintain a consistent street frontage and shoulder height for the buildings (6 storeys). For urban design reasons it is not considered appropriate to increase the height of either of the blocks significantly by adding additional floors. To do so on Block A would have adverse implications for the townscape along Parkhouse Street and to do so for Block B would have adverse implications for the adjacent Park.
58. These two important constraints together with the need to provide on-site play facilities, disabled parking provision and high quality landscaping has led to the need for the scheme to be re-designed by way of a reduction in footprint of one of the blocks. The consequence of this is a reduction in the amount of commercial floorspace that can be accommodated within the development.
59. The proposal would deliver 990 sqm of employment floorspace which is a reduction of 100 sqm (10%). The proposed employment floorspace would comprise spaces for local small and medium enterprises (SMEs), with up to 52 full-time jobs being created. The development has been designed to offer high quality light industrial space with a shared landscaped area, employment uses on the ground floor of both blocks and a generous affordable element thus responding to the identified requirements in the employment study for this area and advice offered by Southwark Studios.
60. When weighing up the benefits of the proposal it is important to consider not just the amount of floor area being provided but the potential employment yield. Guidance on this matter is set out within the "HCA Employment Density Guide 2015" which states: "*when evaluating actual densities, only the occupied floorspace should be used in the evaluation. Appraisers should include a note on the amount of unoccupied space in the building at the time of calculation so that the basis of the calculations are clear. This mitigates the risk of the vacant area distorting the employment density figure.*" On the basis of the guidance set out above, the existing employment yield should be considered to provide zero Full-Time Equivalent (FTE) employee places as the entire property has been vacant for employment purposes for some time. Notwithstanding, an estimate of the maximum employment yield of the existing building has been provided for comparison. The table below sets out existing and potential employment yield.

Calculation of Estimated Maximum Employment Yield of Existing Building			
GIA of Total	Assumed NIA	Estimated	Maximum Estimated

Existing Employment Floorspace	(Based on NIA being 95% of GIA)	Theoretical Employment Density	Full-Time Equivalent Jobs
1089 sqm	1034.55sqm	47sqm per Full Time Equivalent	22 FTE
Calculation of Predicted Employment Yield of Proposed Building			
GIA of Total Proposed Employment Floorspace	Proposed NIA	Estimated Employment Density	Estimated Employment Density Range (based on the range of 'maker spaces')
990 sqm	773sqm	15-40sqm per FTE	19-52 FTE

GIA- Gross Internal Area and NIA- Net Internal Area

61. At the present time the site is vacant and has been for a number of years. Notwithstanding this, the employment density calculations suggest that the redevelopment of the site has the potential to significantly increase the employment yield above and beyond the previous known use. Whilst at its lowest level the employment yield would be lower than the previous use, the proposed space has been configured to be conducive to medium-high densities. The greater level of affordability for the space on-site is likely to appeal to smaller businesses, thereby potentially allowing for greater density to be achieved on-site and as a result, greater employment yield.
62. London Plan Policy E11 requires development proposals to support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases. This requirement is also covered by NSP Policy P27 and the threshold and methodology is set out in the Council's SPD: Planning Obligations. This development does not reach the threshold for employment in the construction or end phase obligations. Nevertheless as a council-owned build, apprenticeship opportunities would be explored. These will be managed directly by the Regeneration Team working with the Local Economy Team.
63. The proposed development would not re-provide the full amount of existing Employment floorspace which would be contrary to London and Southwark Policies. However, the redevelopment of the site would intensify industrial use on the site beyond current levels given that the site has been vacant for some time. The development responds well to the constraints of the site in terms of urban design, the quality of the commercial and residential floorspace proposed and impact on neighbours and townscape. Public benefits arising from the redevelopment (additional job opportunities/modern commercial units and affordable housing) outweigh the minor reduction in commercial floorspace re-provision.
64. Notwithstanding the positive benefits that will arise from redevelopment of this site as discussed above it is considered necessary to secure additional mitigation to offset the reduction in commercial floorspace. To this end the applicant has agreed to a higher provision of affordable workspace which will be discussed in more detail below as well as a financial payment to offset the loss of the

floorspace in accordance with the Planning Obligations SPD.

65. The proposal would introduce residential uses within a PIL which would be a departure from London Plan Policy E2 and Saved policy 1.2 of the Southwark Plan and Core Strategy Policy 10. However, emerging policies are seeking a change in direction in respect of how industrial sites can be managed and developed. NSP22 specifically identifies that residential uses should be introduced across the wider PIL. As such a mixed use redevelopment is considered to be appropriate in accordance with emerging policy and London Plan policy E7.
66. In determining whether the principle of the proposed development would be acceptable in land use terms, the committee will need to consider whether the wider regeneration benefits of the scheme would outweigh any harm caused, and whether those benefits (discussed above) would justify a departure from the adopted planning policy.
67. It is the view of officers that the regeneration benefits (job creation/new fit for purpose commercial floorspace/affordable workspace/additional housing/affordable housing/enhanced townscape) outweigh the negative impact of a slight reduction in commercial floorspace and therefore planning permission should be granted.

Affordable workspace

68. London Plan Policy E2 requires the provision of a range of low-cost B1 business space to be supported to meet the needs of micro, small and medium sized enterprises and to support firms wishing to start up and expand. The policy states “development proposals for new B1 business floor space greater than 2,500sqm, or a locally determined lower threshold in a local development plan document, should consider the scope to provide a proportion of flexible workspace suitable for micro, small and medium sized enterprises”.
69. Policy E3 of the London Plan deals specifically with affordable workspace. The policy states “In defined circumstances, planning obligations may be used to secure affordable workspace at rents maintained below the market rate for that space for a specific social, cultural or economic development purposes”. The policy identifies the circumstances in which it would be appropriate to secure affordable space.
70. Emerging Policy P30 of the New Southwark Plan deals with affordable workspace. Criterion 2 of the policy requires Major ‘B Use Class’ development proposals to deliver at least 10% of the floorspace as affordable workspace on site at a discounted market rent for a period of at least 30 years. The policy recognises that there are many different forms that such space could take depending on the site location, characteristics and existing/proposed uses on site. Only where on-site provision would be impracticable are developers permitted to make a payment in lieu of the on-site provision.
71. This development would deliver 20% affordable workspace. The uplift has been negotiated as a way of mitigating the impact of small reduction in employment

floorspace on site. As part of the evidence base submitted with this application the applicant commissioned a commercial marketing appraisal. This report suggests that in recent years, the demand for commercial premises in the locality of Parkhouse Street has moved on and derives largely from creative occupiers. Camberwell has become a creative hub with the ever growing demand for good quality accommodation. There are a small number of industrial units on the market in the area presently, albeit only available on short leases. The report also suggests an appropriate rent value for the commercial units of £20 - £22.50 per sqft. The affordable workspace would be offered at 25% discount on market value inclusive of service charge. The report has been reviewed by the Local Economy Team and the suggested rent levels were considered to be reasonable and appropriate for this area. The provision of 20% affordable workspace is a significant benefit of the scheme and the terms would be secured within the legal agreement.

72. In order to ensure the space is attractive to potential occupiers, the following matters would need to be addressed/controlled as part of the s106 agreement:
- Fitting out of the affordable workspace to a minimum specification and for the common facilities (such as the bike store, showers and lifts) to remain accessible to staff throughout the lifetime of the affordable workspace unit.
 - A dedicated 'affordable workspace' schedule to be included in any s106 agreement. This will ensure, among other things, that:
 - the workspace is provided for a 30-year period at a minimum of 25% discount on the market rent;
 - discounted rent should be inclusive of service charge;
 - a rent-free period is offered to incentivise uptake.
 - no more than 50% of the market rate floorspace can be occupied until the affordable workspace has been fitted-out ready for occupation;
 - a Management Plan is in place to secure the appointment of a Workspace Provider and a methodology for that Provider to support the occupiers and appropriate marketing of the affordable workspace will be conducted.

Environmental impact assessment

73. The applicant did submit 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.
74. The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 set out the circumstances under which development needs to be under pinned by an Environmental Impact Assessment (EIA). Schedule 1 of the Regulations set out a range of development, predominantly involving industrial operations, for which an EIA is mandatory. Schedule 2 lists a range of development for which an EIA might be required on the basis that it could give rise to significant environmental impacts. Schedule 3 sets out that the significance of any impact should include consideration of the characteristics of the development, the environmental sensitivity of the location and the nature of

the development.

75. The range of developments covered by Schedule 2 includes 'Urban development projects' where the area of the development exceeds 1 hectare which is not dwelling house development or the site area exceeds 5 hectares. The application site is 0.13 hectares and the area development to be provided would not exceed 1 hectare therefore the proposal does not exceed this threshold.
76. Consideration however should still be given to the scale, location or nature of development, cumulative impacts and whether these or anything else are likely to give rise to significant environmental impacts.
77. The proposed application is the redevelopment of an existing brownfield site. The redevelopment would deliver a similar quantum of commercial floorspace in addition to 33 dwellings. The nature and scale of land uses proposed would not give rise to significant environmental effects taking account of the existing uses on site and surrounding context.
78. The new buildings would be significantly taller than the existing warehouses. However, the scale is appropriate to its urban setting. Environmental effects can be adequately assessed and mitigated through the submission of detailed plans and technical reports (daylight/sunlight assessments) that can sit outside the scope of an Environmental Statement.
79. It is noted that there are a number of development sites coming forward within Burgess Business Park and therefore cumulative effects must be properly assessed and mitigated. It is noted that the largest development site within the area (Peachtree Services Ltd) was subject to an ES. Development coming forward on that particular site would be of a much larger scale with more significant environmental effects. As such a full ES would be required. Taking account of the likely nature and scale of the developments being considered, on the other much smaller sites, adequate assessment of the effects and necessary mitigation can be secured through the submission and coordination of relevant technical reports that sit outside the scope of a full Environmental Statement (air quality management/transport assessment/construction and environmental management plans/noise impact assessments).
80. In conclusion the proposed redevelopment of this site is unlikely to give rise to any significant environmental impacts. Therefore an EIA is not required in this instance.

Housing mix, density and residential quality

Delivery of housing

81. The NPPF makes it clear that delivering a significant number of new homes is a key priority for the planning system. London Plan Policies GG4 and H1 reinforce the importance of delivering new homes setting a 10 year target of 23,550 new dwellings for Southwark. Southwark policies reiterate the importance of delivering significant numbers of new dwellings. The Core Strategy sets a target of providing 24,450 net new homes between 2011 and 2026 and the NSP has identified capacity to meet the London Plan target of 23,550 by 2028. The NSP

recognises the importance of the Council as landowner in delivering new homes and sets a target of building 11,000 new council homes by 2043. The redevelopment of this site would make a valuable contribution to the council homes delivery programme.

The aforementioned policies require high quality homes to be delivered across all tenures with a target of minimum 35% affordable dwellings (subject to viability). For public sector schemes the threshold is set at 50% affordable (discussed further below).

Housing Mix

82. London Plan Policy H10 requires a range of unit sizes to be delivered to meet the demonstrable housing needs of the Borough. Core Strategy Policy 7 requires a mix of at least 60% 2+beds, at least 20% 3+ beds and a maximum of 5% as studios. Emerging NSP Policy P2 increases the requirement of 3+ bed units to 25% to address the need for more family sized dwellings.

The table below sets out the proposed housing mix for this scheme

Dwelling Size	Affordable (HR)	Market (HR)	Total (HR)	% of total by unit number
1b1p	0	2 (2)	2 (2)	6
1b2p	4 (8)	3 (6)	7 (14)	24
2b3p	4 (12)	9 (27)	13 (39)	9
2b4p	4 (16)	1 (4)	5 (20)	45
3b5p	4 (20)	2 (10)	6 (30)	18

83. The proposed mix would provide 72% of units as 2+ beds thus meeting adopted policy requirements. The provision of 3+ beds would fall below the adopted and emerging policy requirement at 18% and the provision of studios would be marginally higher than the policy target of 5%. However, on balance given the generous size of the studio units (44sqm compared to the policy requirement of 39sqm), the fact that all units are dual aspect, the constraints of the site which prevent a greater quantum of development being provided, the need to maximise commercial floorspace re-provision together with the fact that the overall level of affordable housing to be provided would be a significant benefit to the borough; and the majority of the larger family units would be within the affordable tenure the mix is considered to be acceptable.

Density

84. The 2021 London Plan and New Southwark Plan no longer seek to define appropriate density by way of numerical calculations linked to PTAL but give more emphasis on a design led approach that seeks to optimise development capacity. Proposals must meet the design led criteria set out in London Plan Policy GG2. London Plan Policy D2 states that density should consider, and be linked to the provision of future planned levels of infrastructure rather than existing levels and should be proportionate the sites connectivity and accessibility to jobs and services. This includes but is not limited to the PTAL Rating. London Plan Policy D3 sets out a list of criteria against which to sense check developments to ensure appropriate density when optimising a sites potential.

Southwark policies require all new residential developments to meet exemplary standards as set out in the Residential Standards SPD (2015).

85. Notwithstanding the above change in policy direction, at the present time Core Strategy Policy 5 is still part of the development plan for the Borough. This policy expects residential developments in the urban density zone to fall within the range of 200-700 habitable rooms per hectare. The Southwark Plan sets out the methodology for calculating the density of mixed use schemes, and requires areas of non-residential space to be divided by 27.5 to create an equivalent number of habitable rooms per hectare
86. This development would deliver 105 habitable rooms in the residential element and the commercial element would equate to 36 habitable rooms (990/27.5). On this basis the density of the scheme would be $D = (36 \text{ commercial equivalent}) + 105/0.13$ (807 residential density) = total density 843hr/ha, sitting above the range set out in the Core Strategy.
87. Although the site is located in an area with a PTAL of 2, it is close to a PTAL 4 area (west end of Parkhouse Street) which indicates a good level of accessibility. There are good cycle networks within the vicinity and as noted by Southwark's Transport Policy Officers the accessibility of the site would improve significantly with the Bakerloo Line extension. Therefore it would be appropriate to consider the future infrastructure levels rather than existing when considering an appropriate density of development for the site.
88. The development is well designed and would offer a high standard of amenity for future occupiers. Minimum internal space standards have been exceeded in the majority of units; there are good levels of daylight and sunlight; homes are provided with good outlook and amenity space; and all dwellings are dual aspect. Overall the design and density is considered to be appropriate for optimising development.

Residential Quality

89. London Plan Policy D6 requires housing to be of high quality design in terms of size, layout, orientation and access to natural light and ventilation. The policy sets minimum internal and external space standards. Saved Policy 4.2 of the Southwark Plan, Strategic Policy 7 of the Core Strategy (2011) and Policy P14 of the NSP highlight the importance of ensuring that new residential development is of a high quality and would offer a good standard of amenity. These standards are based on the nationally described minimum space standards. The Council's Residential Design Standards SPD establishes minimum room and overall flat sizes dependant on occupancy levels, and units should be dual aspect to allow for good levels of light, outlook and cross-ventilation. It should be noted that London Plan standards require a larger minimum size for single bedrooms than the Southwark standards (7.5m compared to 7m).
90. All of the units within this development would meet the individual rooms and unit sizes specified within the Council's SPD and in a majority of cases rooms would exceed minimum standards. The flats would benefit from dual aspect spacious layouts with a good levels of outlook and privacy. The quality of the development is considered to be 'exemplary' when assessed against the criteria set out in the

SPD.

91. A daylight sunlight report has been submitted to demonstrate the quality of the proposed units in this respect. All proposed habitable rooms have been assessed for Average Daylight Factor (ADF) which takes into account the Vertical Sky Component (VSC), and the No-Sky Line (NSL) in the cumulative scenario, i.e. including all emerging neighbouring schemes which are subject to a valid planning application, and so presenting the worst-case scenario for daylight.
92. The results of the study show that 92% of the assessed rooms would receive daylight levels in line with the BRE recommendations. There are six Living/Kitchen/Dining (L/K/D) areas that won't meet standards but the results show that this is due to the presence of balconies serving those rooms. Without the balconies the rooms would meet the standards. An additional study has been conducted for the six living room/kitchen/dining spaces, where these have been assessed separately as kitchens and living rooms. The results of this study show that all living rooms achieve daylight levels greater than 2% (ADF) and it is the kitchens that receive the lower levels of light within the open plan layouts. It should be noted that GLA guidance suggests that for combined L/K/D spaces it is appropriate to use an ADF of 1.5%. If applying the GLA target there are only four L/K/D spaces that fall below the 1.5% target. Within those particular units, even if the kitchens do not meet the minimum criteria, the main living spaces would be well lit and, therefore, the overall result can be considered acceptable.
93. On balance the benefits of having generous balconies is considered to outweigh the impact on daylight for the L/K/D areas particularly when it is the kitchen area that would be most affected. In addition there would be two separate kitchens that do not meet the ADF standards.
94. The report shows that 97% of the units would meet the BRE standard of 80% view of the sky. There are three kitchens that would not pass the test. This is acceptable.
95. With respect to sunlight within the proposed development the assessment concludes that on balance the scheme will provide future occupants with acceptable levels of sunlight, in line with the expectations of an urban location. The results show all of the rooms suitable for testing meet or exceed the recommended sunlight levels throughout the year, and all would be well sunlit during the winter months.
96. Overall, it is considered that the development would offer a good standard of amenity in terms of daylight and sunlight.
97. The noise assessment submitted demonstrates that the building has been designed to afford a good level of amenity for future occupiers and that residents would not experience unacceptable levels of noise from the proposed commercial uses on this site or adjacent sites. The assessment considers use of the internal rooms as well as balconies. The assessment has been reviewed by the Environmental Protection Team and is considered to be acceptable subject to recommended sound proofing conditions.
98. London Plan Policy D7 and NSP Policy P7 require 10% wheelchair dwellings to

be provided. The proposal would deliver 90% of the units to M4 (2) standard and 10% to M4(3). It is proposed to provide 2 wheelchair dwellings within the affordable tenure and 1 within private which would comply with the aforementioned policies. This will be secured within the legal agreement.

Affordable housing and development viability

99. National, regional and local planning policies place a high priority on the delivery of affordable housing as part of the plan led approach to addressing the housing crisis. Southwark's Strategic Housing Market Assessment (SHMA) identifies a need for 2,077 social rented and intermediate homes per annum which is approximately 71% of Southwark's total housing need. The SHMA suggests that approximately 78% of the total affordable housing need is for intermediate housing to meet the housing needs of lower and middle income residents. However, the most acute need is for social rented housing to meet the needs of homeless households living in unsuitable temporary accommodation such as bed and breakfasts or overcrowded conditions.
100. Southwark's Core Strategy requires a minimum of 35% affordable housing to be provided (subject to viability) and this is replicated in the emerging NSP. London Plan Policy H4 requires public sector land to deliver 50% affordable housing onsite, the policy also triggers 50% provision on sites which result in a reduction in industrial floorspace. The policy sets out parameters for fast track routes which will not require a viability assessment and stipulates that fast track applications will be subject to a review mechanisms if development is not commenced within 2 years. The fast track approach is also reflected in NSP policies.
101. As this is a public sector scheme London Plan policies require a minimum of 50% affordable housing to be provided (by habitable room). Within the 50% overall affordable provision, the London Plan Policy H6 requires a tenure split of 30% low-cost rent and 30% intermediate. The remaining 40% is to be determined by the borough. The policy allows for the provision of a higher percentage of social rented dwellings provided the threshold for affordable dwellings overall is reached.
102. Current adopted Southwark Policies require a 70/30 split of the 50% overall affordable provision referred to above, for social rent (70%) and intermediate (30%) as set out in the Affordable Housing SPD. New Southwark Plan Policy P1 deals with affordable housing provision requiring a minimum of 35% provision with a 25% social rent and /10% intermediate. For public sector schemes the policy states that Southwark will follow the London Plan tenure split. This would therefore require a minimum of 30% social rented and 30% intermediate with some scope to negotiate on the remaining 40% but would also allow for 100% social rented provision provided 50% affordable housing is provided overall. There is an acute need for social rented dwellings in the borough and therefore on Council owned sites it would be appropriate to maximise the provision of social rented dwellings.

The table below sets out the proposed affordable provision for this scheme.

Affordable provision (social rented)		
Dwelling Size	Number of units (Hab rooms)	Wheelchair units
1b1p	0	
1b2p	4 (8)	
2b3p	4 (12)	2
2b4p	4 (16)	
3b5p	4 (20)	

103. This application would deliver 16 x social rented dwellings (48% by dwelling or 52% by habitable room). The mix would comprise 4x 1-bed, 8 x 2-bed and 4 x 3-bed. The overall provision of 52% affordable housing of which all of the dwellings would be social rented would make a valuable contribution towards an acute housing need within the Borough in accordance with the aforementioned policies. This is a significant positive benefit of the scheme and would be secured in a legal agreement.
104. In accordance with London Plan Policy H4 a full viability assessment has not been necessary. A summary of costs have been provided to demonstrate that the scheme can be delivered. It is appropriate to include an early stage review mechanism to be triggered if development does not commence within two years.

Amenity space

105. All new flatted developments must meet the following minimum standards and seek to exceed these where possible:
- 50 sqm communal amenity space per development
 - 3+ bed units require a minimum of 10sqm private space
 - 1 and 2 bed units ideally have 10 sqm of private space – if this is not possible the shortfall should be addressed in the communal space
106. Each of the flats would benefit from a private balcony of minimum 10sqm (many exceed this). Shared communal open space totaling 135 sqm is being provided on the ground floor (controlled access for residents only) and the communal roof terrace on level 7 of Block B. In addition 358 sqm of new public realm is being provided to the south, west, and the centre of the site, connecting to the green link proposed on the adjacent development site at 25-33 Parkhouse Street and to Parkhouse Street itself. All of these figures have been calculated without counting any play space, which is provided separately (100 sqm of 0-4 years play space is being provided on-site).
107. The Daylight Assessment submitted assessed the sunlight availability in the proposed communal garden and play space area along the northern boundary of the site. The BRE suggests that for amenity spaces to experience a good level of sunlight, at least 50% of the space should receive 2 hours of sunlight on the 21st March. The report concluded that 65% of the communal amenity and play space to the north of the site would receive at least 2 hours of sunlight thus exceeding the BRE sunlight tests.
108. The amount of space to be provided would be significantly exceed policy

requirements and the details submitted demonstrate that the space would be landscaped to a high standard providing a good level of amenity for future occupiers. A s106 clause is recommended to ensure that all of the amenity space is accessible to both tenures.

Children's play space

109. London Plan Policy S4 requires new residential developments to incorporate good-quality, accessible play provision for all ages. At least 10 square metres of playspace should be provided per child. Using the play space calculator contained within the Mayor's Play and Informal Recreation SPG the proposed development would require the following amount of childrens' playspace:
- 100 sqm for under 5s (actual provision 88sqm but guidance requires a minimum of 100 sqm to be meaningful)
 - 67 sqm for 5-11 year olds
 - 45 sqm for 12+ year olds
 - Total = 212 sqm
110. The proposal would provide 100sqm of playspace for the 0-4 age group located in the landscaped area to the north of the Block B. A clause would be inserted into the legal agreement to ensure that residents of all units would have access to the childrens' playspace. Due to the size of the development it would be difficult to provide meaningful play for older children without compromising the quality of communal amenity space. Given the close proximity to Burgess Park which has a range of excellent facilities for older children it would be more appropriate to secure a payment towards maintenance and improvement of facilities within Burgess Park in this instance.
111. There would be a shortfall of 112 sqm of playspace on the site therefore a contribution of £16,912 would be required towards the 5-11 and 12+ provision which has been calculated in accordance with the Council's Adopted Planning Obligations and CIL SPD (112 x £151).

Design

112. The NPPF stresses that good design is a key aspect of sustainable development and is indivisible from good planning (paragraph 124). Chapter 3 of the London Plan seeks to ensure that new developments optimise site capacity whilst delivering the highest standard of design in the interest of good place making. New developments must enhance the existing context and character of the area, providing high quality public realm that is inclusive for all with high quality architecture and landscaping. This is echoed by Core Strategy Strategic Policy 12 which 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"*. The policy requires new development to conserve or enhance the significance of Southwark's heritage assets. 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.

113. Saved Policy 3.11 states that all developments should ensure that they maximise the efficient use of land, whilst ensuring that, among other things, the proposal ensures a satisfactory standard of accommodation and amenity for future occupiers of the site. It also goes on to state that the LPA will not grant permission for development that is considered to be an unjustified underdevelopment or over-development of a site. Policy 3.12 asserts that developments should achieve a high quality of both architectural and urban design, enhancing the quality of the built environment in order to create attractive, high amenity environments people will choose to live in, work in and visit.
114. The importance of good design is further reinforced in the New Southwark Plan. Policies P12, 13 and 15 require all new buildings to be of appropriate height, scale and mass, respond to and enhance local distinctiveness and architectural character; and to conserve and enhance the significance of the local historic environment. Any new development must take account of and improve existing patterns of development and movement, permeability and street widths; and ensure that buildings, public spaces and routes are positioned according to their function, importance and use. There is a strong emphasis upon improving opportunities for sustainable modes of travel by enhancing connections, routes and green infrastructure. Furthermore all new development must be attractive, safe and fully accessible and inclusive for all.

Site context

115. The area within which the site sits (known as Burgess Business Park) has a mix of small industrial units and yards of different eras, interspersed with pockets of terraced houses. To the extent that it has a coherent character it is given by the strong geometry of the crescent of Parkhouse Street itself and its location adjacent to leafy southern boundary of Burgess Park. Overall, the area appears as a slightly neglected enclave which has a conspicuously smaller scale as compared to much surrounding development, and one that is an obvious candidate for regeneration.
116. Burgess Business Park is covered by a specific policy within the new Southwark Plan (NSP22) which requires re-development at a higher density and employment space to be re-provided along with new houses. The overall area should have enhanced east west and north south routes, including into Burgess Park. The policy see a comprehensive mixed use redevelopment of the Business Park which 'could include taller buildings subject to consideration of impacts on existing character, heritage and townscape'.
117. The scheme is one of several currently submitted for planning permission in this area. In order to ensure that they add up to a coherent whole, a Local Development Study (LDS) has been undertaken. This suggests new buildings to follow the alignment of a widened and improved Parkhouse Street, and confirms the location of the link to the Park immediately to east of the site. The scale of the buildings along Parkhouse Street is suggested as six storeys, but is not given elsewhere. However, the LDS notes an opportunity 'for taller landmark buildings...adjacent to the key pedestrian link into the park and fronting the Park.

118. With regard to heritage, the LDS requires new buildings to respect the setting of the St Georges Church Steeple (just to the east of Burgess Business Park area) and to remain subservient. With regard to the Park the study suggests a 5m protection zone' within each site along the park edge and a secure boundary structure. A key objective is to 'build on the historic industrial character of the site...' In this respect the LDS references a traditional warehouse building at the southern boundary of the Burgess Business Park area. Whilst the LDS has no planning status it has been a useful tool for applicants when designing their proposals.

Site layout and public realm

119. London Plan Policy D8 requires new developments to create well designed, accessible, safe, inclusive attractive and well-connected public realm where appropriate. The policy sets out a range of criteria which new public realm should address. Site allocation policy NSP22 identifies the need for enhanced public realm to be delivered within Burgess Business Park. This particular application site is not large enough to accommodate any form of public square/plaza or similar type of public realm and due to the location of the Burgess Park SINC it would not be appropriate to provide access into the park from this site. However, the development has been designed to enable future connection to the adjacent site should it be appropriate in the future to provide a green link/connection to the park as part of the adjacent redevelopment.
120. The development proposes two blocks to be erected centrally within the site to allow a combination of communal landscaped space and public realm along all site boundaries and between the two buildings.

Along Parkhouse Street, a generous 2.4m clear footway will be provided which will allow for onward connections into the Burgess Business Park site and the adjacent site at 25-33 Parkhouse Street. Greening on the street is provided through a large planting bed adjacent to the main entrance of Block A, avoiding underground services and maximising the potential of the frontage to contribute to the character of Parkhouse Street

The central courtyard has been designed as a shared surface pedestrian and vehicular entrance which would be used to access the single disabled parking space. The central courtyard would act as an area providing amenity value for the public and a potential link towards a future connection into Burgess Park on the development site at 25-33 Parkhouse Street (should that be realised in the future). The central space incorporates a series of planters and ornamental trees, along with wildlife-attracting plants. The quality of the space has been secured by restricting vehicular access to the one blue badge space and having designed the ground floor layouts of the surrounding buildings to increase natural surveillance and active frontages to create a more pleasant pedestrian experience for those using the courtyard. Greenery and planting have been maximised across all pockets and spaces within the site.



Image: View of internal courtyard between the blocks



Image: View of the western route through the site



Image: View of the communal amenity and playspace

The scheme is clearly part of the comprehensive mixed use and higher density development of the area envisaged by Policy NSP22. The setback aligns with Parkhouse Street to help create a widened street with an improved public realm. More specifically, Building A will, with other schemes, create a coherent frontage to Parkhouse Street at a more or less uniform height of six residential storeys. The high point of the scheme is to be adjacent to the potential new route to the Park which could act as a gateway to the Park when the comprehensive redevelopment of Parkhouse Street is realised.

Height scale and massing and appropriateness of a tall building

London Plan Policy D9 deals with tall buildings. The policy requires tall buildings to be defined at a local level but suggests that a building must be a minimum of 6 storeys (18m). The policy sets out a list of criteria against which to assess the impact of a proposed tall building (location/visual/functional/environment /cumulative).

Policy 3.20 of the Southwark Saved Policies and P.16 of the New Southwark Plan deal with tall buildings. Policy 3.20 defines a tall building as one which is 30m tall. The policy includes a list of criteria against which to assess the acceptability of a tall building. Similar criteria are reflected in emerging NSP P.16 albeit with a greater emphasis on exemplary design and the requirement to provide enhanced public realm

In terms of the appropriateness of the location for a tall building. Policy D9 states that Boroughs should determine if there are locations where tall buildings may be an appropriate form of development. The site and the area (Burgess Business Park) is not specifically identified in the Current Local plan or Core Strategy. However it is covered by the new Southwark Plan which is close to adoption and which can therefore be afforded some weight. As outlined above, this suggest that tall buildings could be appropriate within the site allocation.

The aforementioned policies set out a range of impact criteria against which to assess tall building proposals. Functional and environmental impacts are considered in relevant sections of this report. The design related impacts are as follows:

Views, visual impact and relationship with surrounding area including way finding

The development is not tall enough to have an impact on long range strategic views. However mid/long range views from east to west will be available across Burgess Park to the proposed buildings along the southern edge of the Park, including those proposed by this scheme. There is no doubt that this scheme, along with adjacent schemes, will change these views from one where buildings are not by and large visible above the Burgess Park tree canopy to one where the scheme and adjoining proposals will be obvious features rising above the canopy.

However, Burgess Park is very large and open space. Buildings that are just tall enough to fall into the definition of tall buildings (as proposed) will not impact upon the Park's sense of openness or unduly upon its general character. The tops of buildings raising above trees can provide an edge or boundary to an open space or park which is common in London.

This proposal consists of buildings of varying heights (five, seven and ten storeys), as do adjacent proposals, with most buildings falling below the 30m (approx. nine or ten storeys) definition of a high building. Due to this varying scale, the cumulative effect of the buildings along the edge of the Park would not be overbearing, and would in any case be softened by extensive trees within the Park, especially along its southern boundary with the scheme. This is well illustrated by CGIs along the main east/west path across the park (Views 1-5

Design and Access Statement) where the scheme rises into the skyline above large boundary trees to only a small extent.

In closer views from the south the proposal would be largely enclosed by adjacent development proposals, if granted planning permission. The whole would function and would be read, as new neighbourhood which is large enough to create a new character for the area. The collective character has in part been shaped by a recent Local Development Study, which although not statutory, has laid down key urban design rules to ensure a coherent and attractive overall character, albeit one at a much taller and more intensely developed than the current very low rise semi industrial area that exists at present. Again, this is not inappropriate for a comprehensively regenerated area.

In common with other proposals, the frontage Building A is to be set back from the current building line to create a much more generous pavement and more generous scale to Parkhouse Street. Along with other schemes this will create a more attractive and functional public realm as a part of the regeneration of the area.



Image: View from Burgess Park



Image: View looking east from Parkhouse Street



Image: View looking west along Parkhouse Street

Architectural quality and materials

The constituent parts of the scheme (the commercial Block A facing Parkhouse

Street and the two parts of Block B) have a similar aesthetic of solid brickwork with large window openings, but with contrasting brick colours which will be effective in breaking down the apparent mass of the scheme into distinctive parts. The overall aesthetic is enhanced by the depth and rhythm given to the facades by deep set window openings and by regular and large columns running from top to bottom of the facades. The overall effect would be one of considerable depth and solidity, not unlike the aesthetic of traditional warehouses. This is entirely appreciated given the area's industrial past, and given that it would still function as mixed use area that includes some industry.

Further richness would be given by the introduction of partially inset balconies with robust metal balustrades, exposed stone banding over windows and at parapets. Additional interest would be provided by partial infilling of window openings on the commercial building with patterned metal louvres, and by rusticated (textured) brickwork at the base of the buildings adjacent to the route through to the park.

The scheme would be enhanced by a landscaping proposal which would create a route into a courtyard with high quality paving materials and planters between the two buildings. This would be much enhanced by the planting proposed to the existing brick boundary wall between the site and the site to the west. A well landscaped children's play area is proposed in the 5m gap between Building B and the Park. This would also have a brick boundary wall to the park which will give the area a degree of seclusion and a character akin to that of a walled garden.

The building would form a boundary for a potential route from Parkhouse Street to Burgess Park. For reasons of security and privacy this ground floor frontage is to be relatively blank with areas of patterned brickwork in place of window or entrances. This treatment is common next to traditional pedestrian routes or passageways between buildings.

Overall, the architecture of the scheme can be judged to be a high standard as required for a building of this height and scale.

Impact on the setting of St George's Church and Wells Way Baths

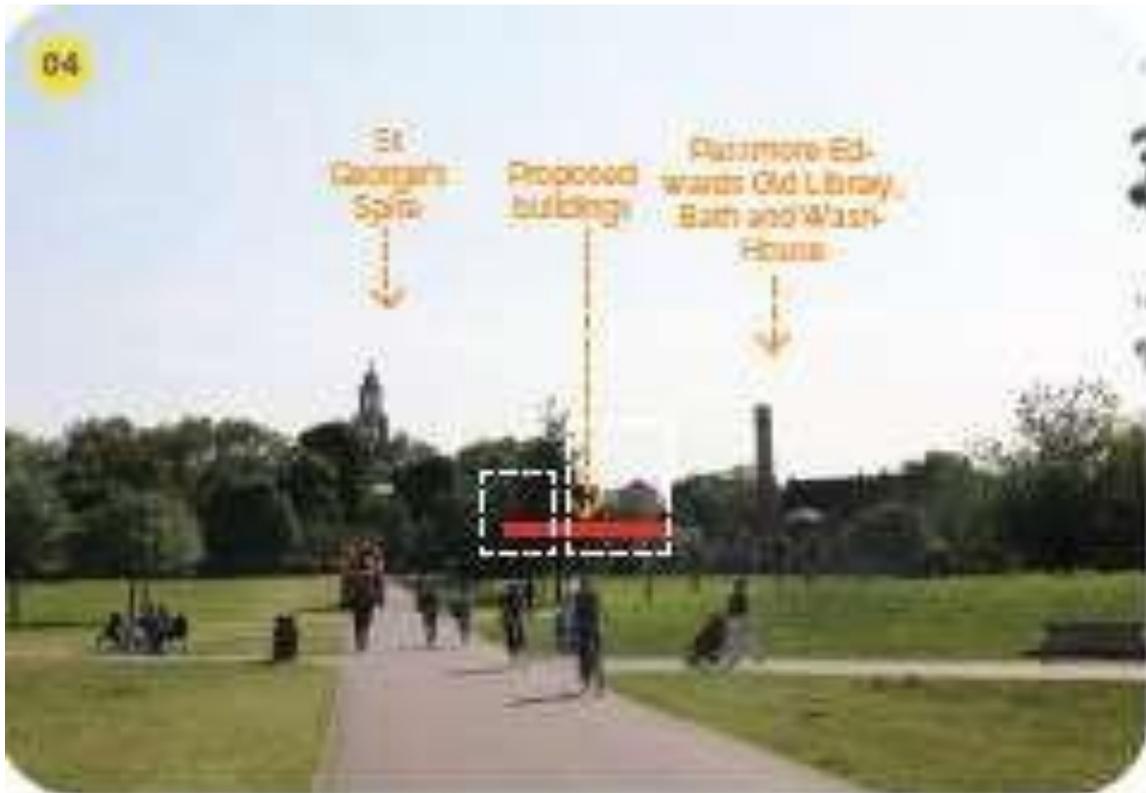
Views across the Park include the heritage assets of the former St George's Church (Grade II listed) and its slim picturesque spire rising into the skyline, and the chimney of the former Wells Way Baths (also listed). In key views from the main east/ west path way across the Park, the scheme would be well to the right of the St Georges Church spire such that it will not impinge unduly upon the setting of the church. The chimney of the baths is on a different axis such the scheme's proximity to the chimney as viewed from the path will change as one moves along it. In more distant views from the east, the highest part of the scheme would be just to the left of the chimney, but this distance between the scheme and the chimney increases as one moves westwards along the path. Overall the scheme in itself will have little impact on an appreciation of these landmarks and will be subservient to them.



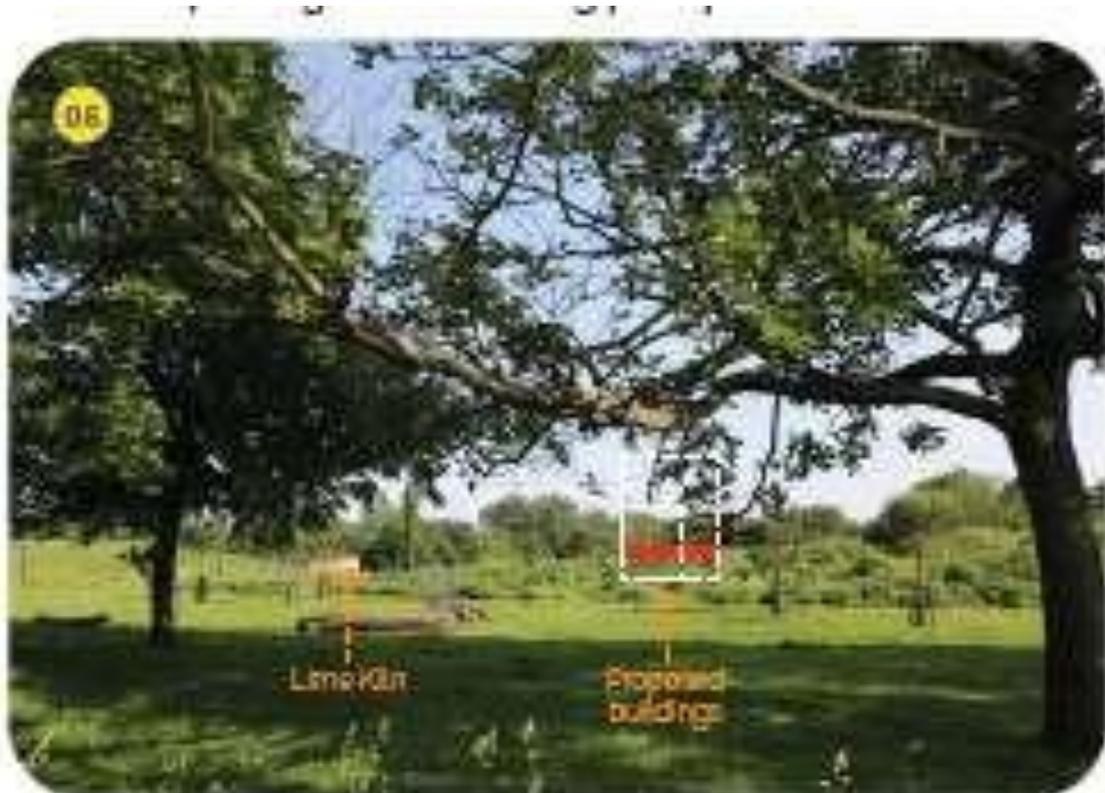
View 2 - Burgess Park across the Lake



View 1 - Burgess Park along the Lake



View 4 - Burgess Park along park path



View 5 - Burgess Park facing south

Impact in terms of reflective glare and light pollution

These aspects are discussed in detail in relevant sections of this report.

Particular attention has been paid to the need to minimise light pollution to the ecological area of the park immediately adjacent to the scheme by virtue of the set back behind the no-build 5m buffer and the use of solid balustrades and minimal external lighting on the north elevation.

Cumulative impact

The scheme is one of several at a similar scale which would change the character and function of the area. Overall coherence has been ensured in terms of approach to scale and mass as well as an architectural language and materials pallet that will ensure the buildings complement one another but have enough variety to be an interesting part of the townscape.

Summary of tall building assessment

The above analysis sets out the acceptability of a tall building on this site when judged against London Plan Policy D9 as well as Policy 3.20 of the Southwark Saved Policies and emerging NSP Policy P.16. . I know what you mean but sounds weird! The site is capable of accommodating the scale of development proposed, the height is proportionate to the size of the site and significance of the area. The form and mass of the blocks are appropriate for this site (having regard to the emerging context) and the blocks have been designed to be read as a high quality addition to the townscape. As for public realm, the provision would be commensurate with the height of the building and the size of the site. This is one of the smaller sites within the overall Burgess Business Park allocation and as such it would make a proportionately smaller (but still important) contribution to the regeneration of the area by opening up routes around the blocks, enhancing this part of Parkhouse Street and securing the possibility of connecting into a future route into the park

Architectural design and materials

The architectural design and materials pallet have evolved as result of negotiations with planning officers. The buildings have been designed to reflect the historic industrial nature of the area but also to relate to the existing and proposed residential schemes coming forward. Brick is a robust and durable material that will stand the test of time and can be used to add interesting details to the building by way of patterned features, soldier coursing and piers. A combination of red/buff and white brick will help to reduce the mass of the blocks. The use of white brick on the lower residential block will improve reflectivity of light on the scheme to the west and the wider area. Brown metal fenestration, balustrades and cladding will complement the brickwork and bring a synergy to the development as a whole. A combination of cast glazing and perforated metal panels have been used to facilitate generous openings in the facades whilst protecting amenity.

The architectural design and chosen materials pallet would result in a high quality building making a positive contribution to the townscape and character of the area. Conditions are recommended requiring the submission of material samples.



Image: Proposed elevations looking east



Image: proposed elevations looking west

Heritage considerations

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires local planning authorities to consider the impacts of a development on a listed building or its setting and to pay special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Chapter 16 of the NPPF contains national policy on the conservation of the historic environment. It explains that great weight should be given to the conservation of heritage assets. The more important the asset, the greater the weight should be (paragraph 193). Any harm to, or loss of significance of a designated heritage asset should require clear and convincing justification (paragraph 194). Pursuant to paragraph 195, where a proposed development would lead to substantial harm or total loss of significance of a designated heritage asset, permission should be refused unless certain specified criteria are met. Paragraph 196 explains that where a development would give rise to less than substantial harm to a designated heritage asset, the harm should be weighed against the public benefits of the scheme. Paragraph 197 deals with non-designated heritage assets and explains that the effect of development on such assets should be taken into account, and a balanced judgment should be formed having regard to the scale of any harm or loss and the significance of the asset. Working through the relevant paragraphs of the NPPF will ensure that a decision-maker has complied with its statutory duty in relation to Conservation Areas and Listed Buildings.

Development plan policies echo the requirements of the NPPF in respect of heritage assets and require all development to conserve or enhance the significance and the settings of all heritage assets and avoid causing harm.

The site does not include any listed buildings and is not in a conservation area. However, there are a number of listed buildings nearby and the site has a direct relationship with Burgess Park to the north. The nearest conservation area is the Addington Square Conservation Area to the west of the site. However, given the scale of the proposed development it would have no impact on its setting.

The proposed scheme would affect views across the Park and in this respect would have the potential to impact the setting of designated heritage assets; St George's Church (Grade II listed) and its slim picturesque spire rising into the skyline, and the chimney of the former Wells Way Baths. These listed buildings are significant heritage assets that should be afforded protection. As shown in the images above, in key views from the main east/ west path way across the Park, the scheme will be well to the right of the St Georges Church spire such that it will not impinge unduly upon the setting of the church. The chimney of the Baths is on a different axis such the scheme's proximity to the chimney as viewed from the path will change as one moves along it. In more distant views from the east, the highest part of the scheme will be just to the left of the chimney, but this distance between the scheme and the chimney increases as one moves westwards along the path. Overall the scheme in itself will have little impact on an appreciation of these landmarks and will be subservient to them.

It is important to note that Paragraph 196 of the NPPF sets out two categories of assessing harm namely, substantial or less than substantial. Where some harm albeit very minor harm would arise this must be classed as less than substantial. It is considered that there is a very minor harm to the setting of the church spire and chimney in that some of the upper parts of these buildings would be visible in the skyline between them. However the harm is considered to be less than substantial and on the lesser side of this. Therefore in accordance with paragraph 196 of the NPPF it is necessary to weigh up the harm against any public benefits

of the proposal. The redevelopment of the site would bring significant public benefit to the borough by virtue of delivery a good quantum of high quality employment floorspace of which 20% would be secured as affordable workspace; as well as providing 33 new dwellings of which 50% would be affordable. The delivery of housing and employment units would help to meet the Council's aspirations for the area in accordance with the NSP site allocation. Furthermore the redevelopment would result in high quality buildings that would make a positive contribution the townscape and would enhance the character and appearance of the area. Officers consider that the very minor and less than substantial harm to nearby heritage assets would be outweighed by the public benefits of the redevelopment.

There are other listed buildings to the south and east of this site. However, the redevelopment of this site would have no impact upon those heritage assets as the new buildings would be screened by adjacent developments.

In conclusion, whilst there would be some (very minor) less than substantial harm to the setting of heritage assets in the park, this is considered to be justified given the wider benefits of the proposal. Officers therefore consider that the proposal would comply with the relevant design policies and the NPPF.

Landscaping, trees and urban greening

London Plan Policy G7 and NSP Policy P60 recognise the importance of retaining and planting new trees wherever possible within new developments, Policy G5 requires major development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. The policy identifies a scoring system for measuring urban greening on a particular site (Urban Greening Factor) and suggests a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development (excluding B2 and B8 uses). There is no identified score for mixed use developments.

At the present time the site comprises hard landscaping consistent with a former industrial site. Therefore the opportunity exists for significant improvements to be made in terms of soft landscaping proposals and contribution towards urban greening. The landscape design of the scheme has been revised following initial assessment, and a greater number of trees and planting are now proposed within Parkhouse Street; the central courtyard; and the play space to the rear of the site. Overall, there are now 14 trees and considerable areas of soft planting at ground and roof top levels. The species of the proposed trees have been selected carefully for to suit the conditions of the site adjacent to Burgess Park and to ensure their longevity and amenity value.

The possibility of providing street trees in the footway of Parkhouse Street adjacent to this site was explored. However due to the constraints imposed by the highways requirements, utilities and services adequate trees pits could not be provided to ensure that mature trees could be sustained. Therefore in this

instance a planter has been proposed instead. This will make a positive contribution to the public realm but will not have the same benefits as substantial street trees. For this reason it is considered necessary to secure a financial obligation of £9,000 to cover the planting of 2 trees in the vicinity of the site.

An Urban Greening Factor calculation was undertaken and included within the Landscape Design section of the Design and Access Statement. This was subsequently updated and improved and the site would achieve 0.47 rating thus exceeding both the commercial and residential targets. The UGF document clearly demonstrates that the site would comfortably achieve a net biodiversity gain and provide high quality green spaces at every opportunity. This would be achieved through intensive green roofs, trees, flower-rich perennial planting, and permeable paving.

An arboricultural impact assessment was submitted which looked into the impact on trees which in the adjacent woodland area of Burgess Park. The results of the survey identified a total of 22 individual and 4 groups of trees adjacent to the development within the woodland area. Although none of these are of a high value there are 4 individual and 1 group which have been identified as being a Category 'B' of moderate quality.

Due to the woodland nature of the location of the trees, none of them are particularly prominent or of individual outstanding value. However, as a whole they are of important habitat and conservation value. The value of the trees as a group has been taken into consideration during the categorisation process.

The assessment process has identified that no trees would require removal to facilitate the development.

No tree works are required to facilitate the construction of the proposed development. However, since the original survey, trees have grown and are now in contact with the existing structure. They would need to be pruned back before the structure is removed to ensure they do not fail.

The survey reveals that the layout of the proposed buildings would not encroach upon the root protection area (RPA) of any trees and there is unlikely to be any future conflict between the trees and the northern building. The works to re-build the existing boundary wall would encroach on the RPA of a group of dog woods and wild cherry. However, there is the chance the roots do not encroach into this area due to the existing wall and hard standing. It is considered necessary and appropriate recommend a condition requiring a method statement to be submitted for detailed construction of the boundary wall.

The Council's Urban Forrester has reviewed the landscaping proposals and Arboricultural Impact Assessment and is satisfied with the proposal subject to recommended conditions to protect trees during construction, to control the landscaping proposals in detail and a contribution towards street trees. An informative is recommended alerting the applicant to the fact that any works to trees within the boundary of the park will require a separate consent from the Parks Team.

Ecology and biodiversity

The protection and enhancement of opportunities for biodiversity is a material planning consideration. Development plan policies (Saved Policy 3.28 and NSP Policy P59) require applicants to demonstrate that new development proposals would not result in any harm to protected species or wildlife habitats. London Plan Policy G6 requires development proposals to manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process. The policy seeks to protect SINC but acknowledges that where harm is unavoidable it should be mitigated.

A number of reports have been submitted with the application to address the impact of the proposal upon ecology. The conclusion is that the buildings on site do not have bat roost potential, there were no suitable roosting features identified and no evidence of bats was found within the buildings. The site was not considered to support other protected species, including reptiles, badgers and hedgehogs. The buildings may support nesting bird species. The developer is duty bound to make checks for nesting birds before demolition if it is in the breeding season March – August.

Given the lack of wildlife habitat on site at present the redevelopment offers an opportunity to significantly enhance biodiversity. The proposed landscape strategy has been developed to enhance ecology and biodiversity through the specific range of planting and inclusion of ecological features such as living roofs, bird and bat boxes/bricks, insect towers. These should be secured via conditions.

Given the location of the site adjacent to the Burgess Park which is protected MOL and the woodland area which is a designated SINC, the impact of any redevelopment on the ecology of the park must be assessed. In terms of the location of the buildings the assessment submitted by the applicant looks at the impact of the proposal on the woodland area. A bat survey revealed bats using the woodland were two species identified- Common and Soprano Pipistrelles. These bat species are the most common within the UK and are often associated with urban habitats and parkland. These species are known to be less sensitive to light levels and show more tolerance to urban habitats.

The reports conclude that the proposed building would be set back far enough from the shared boundary to prevent any harm to the roots or canopy of trees within the park and the development would not affect the tree growth. In terms of overshadowing, there is no technical basis for measuring impact upon ecology. However, the assessments suggest that any overshadowing would be transient, the greatest impact would be in the winter months and is unlikely to be detrimental to the SINC.

The other important issue to consider is the effect of light pollution. The development would result in an increase in residual light from the site. It is necessary to ensure that the redevelopment of this site is designed to reduce the impact on the SINC as much as possible and to mitigate any adverse impacts that may arise. Light pollution is particularly important given the recorded presence of bats, albeit those more tolerant to light. The ecology reports identify the need for sensitive lighting to the north elevation of the building.

A lighting assessment has been submitted which looks at the impact on ecological receptors as well as future and existing residents. A survey of existing light levels was undertaken after 23:00 to ensure accurate baseline conditions. The lighting specifications and fittings used within the assessment have been chosen to protect potential ecological receptors to the north of the site by keeping lighting lux levels below 1 Lux. The balconies have been lit to an average luminance of 5 lux (using downlights). It should also be noted that the lighting model does not account for the additional mitigation offered by existing/proposed vegetation and it is therefore very much a worst-case scenario assessment. Proposed vegetation and landscaping across the site, is therefore likely to further reduce the residual light spill.

In terms of impact upon ecology, the lighting assessment concludes there would be no significant adverse impacts predicted as a result of lighting from the proposed development at any of the nearby sensitive ecological receptors representative of foraging and commuting routes providing the above mentioned lux level are used. Furthermore the proposed lighting scheme meets the Institute of Lighting Professionals (ILP) sky glow limitations and is therefore not considered to result in detrimental impacts on the dark sky landscape

To minimise the impact on the SINC, the buildings have been designed to be 5m from the shared boundary (including balcony overhang). This set back together with the solid design of the balconies and the sensitive construction and operational lighting proposal is sufficient to ensure that unacceptable impacts by way of light pollution, noise or disturbance to wildlife within the SINC would not occur.

The landscape strategy has been designed to respect the adjacent SINC, the boundary wall has been designed as a green wall to further enhance biodiversity on the application site. Furthermore the applicant has agreed to a financial contribution towards planting and maintenance on the park side of the wall to help mitigate the impact of the development.

It is proposed to incorporate wildflower planting on the terraces to enhance biodiversity opportunities as well as installing bird and bat boxes and insect towers. This can be controlled by conditions.

The ecological and light surveys submitted by the applicant have been analysed by the Council's Ecologist who has no objection to the proposal.

Cumulative impact

In addition to the reports submitted by the applicant the council commissioned an independent ecology report (prepared by an external ecologist) to assess the cumulative impact of all of the planned redevelopments along the boundary of the SINC. This report looked at as a result of construction impacts, overshadowing, increased recreational pressure and light spill.

In terms of overshadowing the report concludes that the area of woodland which is predicted to receive increased shadowing in the winter months as a consequence of cumulative development is broadly the area that supports the

lowest understorey diversity. Whilst some disturbance upon the woodland is therefore possible, it is not considered likely that this would significantly impact the conservation status of the New Church Road Nature Area or Burgess Park as a whole, nor would it likely impact the individual receptors, bird, bats or invertebrates. The greatest overshadowing impact is predicted for the winter months when trees and most flora are dormant. The woodland understorey is not of sufficient diversity or structure for this additional shadowing to be considered significant in Ecological Impact Assessment terms, i.e. any change to the woodland community would not affect its conservation status or ecological functionality given the site's urban location, existing level of disturbance and the presence of common species. Confidence that any impact would not be significant can therefore be concluded

In terms of potential impacts upon birds or bats the report concludes that without mitigation there could be temporary impacts arising from construction and permanent local impact. To address this, mitigation has been suggested by way of securing a Construction Environmental Management Plan that includes measures to minimise disturbance arising during construction, controlled operational lighting, landscaping within the site to include a landscape and habitat management plan and enhanced opportunities for ecology and biodiversity through living roofs and appropriate planting. All of these matters have been agreed with the applicant and will be controlled by way of conditions and s106 obligations.

Furthermore to mitigate an increased recreational pressure the report suggests that the nature and location of the multiple developments coming forward provides an opportunity for a small strategic habitat bank to be created in Burgess Park. This could be delivered through a proportional contribution towards this cost from developments which share a boundary with the Nature Area. This has been agreed in principle with the applicant. The detailed costs associated with this element of mitigation need to be further refined and secured as part of the s106 agreement. A further verbal update will be provided at the committee meeting. Improvements in biodiversity delivered through this mechanism alongside enhanced green infrastructure habitat being provided within the red line boundaries of each of the Parkhouse Street schemes stands to in fact present an opportunity for notable improvements in local biodiversity

The report concludes that if all recommended mitigation is secured from all of the developments there would be a permanent positive impact at a local scale.

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

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 states planning permission for development will not be granted where it would cause loss of amenity, including disturbance from noise, to present and future occupiers in the surrounding area or on the application site. Furthermore, Saved policy 3.11 Efficient use of land of the Southwark Plan 2007 states that all developments should ensure that they maximise the efficient use of land, whilst ensuring that,

among other things, they do not unreasonably compromise the development potential of or legitimate activities on, neighbouring sites. It also states that the LPA will not grant permission for development that would not allow for satisfactory standard of accommodation and amenity for future occupiers of the site.

The importance of protecting neighbouring amenity is further reinforced in NSP Policy P55 which states “Development should not be permitted when it causes an unacceptable loss of amenity to present or future occupiers or users”. The adopted 2015 Technical Update to the Residential Design Standards SPD 2011 expands on policy and sets out guidance for protecting amenity in relation to privacy, daylight and sunlight.

Outlook and privacy

In order to prevent harmful overlooking, the 2015 Technical Update to the Residential Design Standards SPD 2011 requires developments to achieve:

- A distance of 12 metres between windows on a highway-fronting elevation and those opposite at existing buildings, and;
- A distance of 21 metres between windows on a rear elevation and those opposite at existing buildings.

At the present time the site is adjoined on both sides by industrial uses. However, both sites are subject to planning applications for mixed use redevelopment and therefore it is necessary to ensure that an appropriate assessment has been made in that respect.

Burgess Business Park (15-19 Parkhouse Street)

The adjacent site to the west forms part of the Burgess Business Park site. This part of the site is currently occupied by a 3 storey pitched roof warehouse building which runs the full length of the site boundary adjoining 21-23 Parkhouse Street, the building has a flat roofed element at the front with hardstanding for parking immediately adjacent. There is a further hard landscaped forecourt/parking area running to the west of the warehouse behind the residential terrace (1-13 Parkhouse Street). A planning application is under consideration for this site to comprising conversion of the existing warehouse (named Block B within the submission) into commercial uses at the rear and residential units at the front. In addition a terrace of 4 dwellings will be erected within the hardstanding area to the west of Block B.

The existing warehouse on this site is constructed hard onto the shared boundary and as such presents a rather un-neighbourly form of development. That said, retention and conversion of the existing building does provide the opportunity for a solid brick boundary treatment on the shared boundary with 21-23 which helps address privacy between the two sites at ground floor level. Furthermore there would be limited opportunities for overlooking or loss of privacy between the commercial uses within Block B (the retained building) and the new Block B on 21-23 given the low rise nature of the existing warehouse (in comparison to the proposed development on 21-23) and the fact that it only has windows in the top

floor. Whilst some overlooking may occur between the users of the commercial space and the adjacent residential occupiers it would be oblique views and would be limited to when the commercial premises were open. As such it is not considered that this would compromise the amenity for occupiers of the residential units at 21-23 and it would not be detrimental to the commercial use of the warehouse.

The residential units at the front of the adjacent block would be located hard onto the shared boundary and the floor plans submitted for that scheme show windows proposed in the side elevation. However, these windows would face onto the commercial Block A of 21-23 and would be separated by the access route into the site. Whilst the distance between the two side elevations would only be 4.5m the commercial block on 21-23 has been designed to minimise the effects of overlooking and loss of privacy through the addition of metal panels on the windows to reduce the size of the glazed openings and the residential units on this site have been designed as dual aspect residential with the living areas facing onto Parkhouse Street. Overall it is considered that a satisfactory standard of amenity will be afforded to the future residential occupiers on this site.

A distance of 38m would be retained between the buildings on the application site and the proposed houses on the site of 15-19. This is sufficient to prevent any unacceptable harm by way of overlooking or loss of privacy.

Impact on 25-33 Parkhouse Street

This site is subject to a planning application for mixed use redevelopment. The blocks closest to 21-23 comprise a part 6/part 7 storey block accommodating commercial uses at ground and first floor and residential from the third floor upwards and an 11 storey block which would have commercial use on the ground floor and residential use at first floor and above. The blocks are separated from the shared boundary by a soft landscaped amenity space/route through the site. This space measures approximately 9m wide between the blocks towards the front of the site and increases to 17m wide at its widest section towards the northern boundary. Where the amenity space widens is also where the buildings on 21-23 step further away from the boundary (5.6m away). As a result the residential blocks on each site, at this point would be located over 20m away from each other. This distance together with the way the buildings have been designed to angle away from each other is sufficient to ensure that a satisfactory standard of amenity will be afforded to the residents of both schemes and direct opportunities for overlooking would be limited.

At its closest point the residential block on 21-23 (Block B) would be located only 1m from the shared boundary and 9m from the elevation of the blocks on 25-33. Whilst this distance would not meet the residential standards SPD, the buildings on both sites have been sensitively designed to minimise direct overlooking between the windows. Through the use of dual aspect layouts, balconies, oriel windows and the tapered angle of the blocks, combined with the separation created by a public route/amenity space it is considered that an acceptable standard of amenity would be afforded for occupiers of both schemes.

Existing Neighbours

The nearest existing residential dwelling is 13 Parkhouse Street located approximately 26m to the west of the site boundary. Given the distance and intervening structures between the site and 13 Parkhouse Street, occupants would not be subject to adverse impacts on their privacy and overlooking.

Daylight and Sunlight Impact

The Building Research Establishment guidance sets out the rationale for testing the daylight impacts of new development through various tests. The first is the Vertical Sky Component test (VSC), which is the most readily adopted. This test considers the potential for daylight by calculating the angle of vertical sky at the centre of each of the windows serving the buildings which look towards the site. The target figure for VSC recommended by the BRE is 27% which is considered to be a good level of daylight and the level recommended for habitable rooms with windows on principal elevations. The VSC, however, is a general measure of potential for daylight in a space that does not take into consideration the function of the space being assessed and should be carried out at early design when rooms' layout is not yet determined and the optimum position of windows is being assessed.

The most effective way to assess quality and quantity of daylight within a living area is by calculating the Average Daylight Factor (ADF), this is the most appropriate methods for new dwellings. The ADF, which measures the overall amount of daylight in a space, is the ratio of the average illuminance on the working plane in a room to the illuminance on an unobstructed horizontal surface outdoors, expressed as a percentage. The ADF takes into account the VSC value, i.e. the amount of daylight received on windows, the size and number of windows, the diffuse visible transmittance of the glazing used, the maintenance factor and the reflectance of the room surfaces. Therefore, it is considered as a more detailed and representative measure of the daylight levels within a living area.

The third method is the No Sky Line (NSL) or Daylight Distribution (DD) method which is a measure to assess the distribution of daylight in a space and the percentage of area that lays beyond the no-sky line (i.e. the area that receives no direct skylight). This is important as it indicates how good the distribution of daylight is in a room. If more than 20% of the working plane lies beyond the no-sky line poor daylight levels are expected within the space.

The table below summarises the relevant criteria for the assessment of daylight

Measure of Interior Daylight	Benchmark	Daylight Criterion
Vertical Sky Component (VSC)	27%	If VSC is at least 27% then the conventional window design will usually give reasonable results

Average Daylight Factor (ADF)	2.0%	Min value for kitchens
	1.5%	Min value for living rooms
	1.0%	Min value for bedrooms
No-sky View	80%	There will be a good distribution of light in the room if at least 80% of the working plane receives direct skylight

In terms of sunlight all windows which face within 90 degrees of due south should be tested. The BRE guide states that sunlight availability may be adversely affected if the centre of the window:

- receives less than 25% of annual probable sunlight hours, or less than 5% of annual probable sunlight hours between 21 September and 21 March and
- receives less than 0.8 times its former sunlight hours during either period and
- has a reduction in sunlight received over the whole year greater than 4% of annual probable sunlight hours

The NPPF sets out guidance with regards to daylight/sunlight impact and states “when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site”. The intention of this guidance is to ensure that a proportionate approach is taken to applying the BRE guidance in urban areas. London Plan Policy D6 sets out the policy position with regards to this matter and states “the design of development should provide sufficient daylight and sunlight to new and surrounding houses that is appropriate for its context”. Policy D9 (Tall Buildings) states that daylight and sunlight conditions around the building(s) and neighbourhood must be carefully considered. Emerging policies within the NSP identify the need to properly consider the impact of daylight/sunlight without being prescriptive about standards.

This application was accompanied by two Daylight and Sunlight Assessments undertaken in accordance with the BRE Guidelines. The HTA Assessment considers the impact on the proposed residential units and amenity spaces within the development site. As set out above in the housing quality standards and amenity space sections of this report, the assessment demonstrates that the proposed development would receive adequate levels of daylight and sunlight.

The second report prepared by Herringtons considers the impact of the development upon existing and proposed neighbours on the sites immediately to the east and west. Both neighbours are subject to planned redevelopments. In terms of the adjacent proposed schemes the assessment was based on the plans submitted as part of the current planning applications and uses ADF to demonstrate the impact on daylight.

Burgess Business Park (15-19 Parkhouse Street)

In terms of the impact of the proposal on the planned redevelopment of the

Burgess Business Park site located immediately to the west of the site it is necessary to specifically consider the impact upon Block B. The application proposes retention of the existing commercial building (to be used for commercial purposes) together with conversion of the front of the building to accommodate new residential units. The Herrington report submitted assessed the impact on the appeal scheme, an appeal which has now been dismissed. In terms of the appeal scheme the report came to the conclusion that there would be no unacceptable impacts/loss of daylight and sunlight due to the proposals at 21-23, and their location/orientation which would not have blocked daylight/sunlight towards this part of the site. The assessment details that there were 6 rooms in Block B which came back with ADF values below the target, and from comparing this to the now-proposed plans - 5 of these were for rooms in units which have now been removed. The 6th, which was for the unit at the front which has largely been retained, only marginally failed with it being a living/kitchen/dining space which achieved 1.92% ADF – 0.08% below the 2% target, which is a very small shortfall. The Herrington report explained if that if the dominant use of the room is considered – a living room – then the target of 1.5% ADF applies and therefore there would be no shortfall. This would accord with GLA guidance of using 1.5% for combined living spaces.

When considering the impact on the recently submitted application there are now 4 residential units proposed in Block B because the accommodation at ground and first floor forms two duplex-style homes with the living and kitchen spaces at GF and the bedrooms at FF, and then there are two 1-bed units on the second floor. These have similar window locations to the previous scheme, and still have their primary outlook over Parkhouse Street to the south.

The Herrington report has assessed a worst case scenario on the adjacent scheme to the west by testing the refused/appeal scheme, which was larger and had more residential units, and came to the conclusion that the impacts were acceptable and in line with the BRE guidance. Consequently it can be concluded that there would not be an unacceptable impact on the current proposed scheme.

Impact on 25-33 Parkhouse Street

In terms of the impact on the site to the east (25-33 Parkhouse Street) the assessment looks at the ADF to be achieved within the relevant rooms (habitable rooms that face the application site). The assessment looked at rooms on the first and second floors as a worst case scenarios (the upper floor rooms with the same layout would have the same or better impact). When looking at combined L/K/D spaces the ADF target for living rooms (1.5%) has been used. This reflects the London Plan Guidance. The report identifies that 8 of the 20 rooms assessed at the lower levels of the building would fall marginally below the ADF target. However, daylight distribution in 2 of the 8 rooms already falls below the target as a result of the design of the building in which they are located. The remaining 6 of those 8 rooms would meet ADF targets if they hadn't been designed with generous (deep) balconies. The presence of balconies means that once a development is constructed on the adjacent site the rooms would fall marginally below the ADF targets. This will be a similar situation with the units on the upper floors. The benefits of providing private balconies usually outweighs the adverse impact on daylight (where reductions are minor) and it would be unreasonable for the presence of balconies to preclude development on adjacent sites. Consequently it is not considered that the development of 21-23 Parkhouse Street would have a significant impact upon the planned scheme at 25-33

Parkhouse Street in terms of daylight. Furthermore there would be a negligible impact upon sunlight.

The existing residential terrace at 1-13 Parkhouse Street will not be affected by way of sunlight/daylight impact from the proposed scheme.

Overall the assessment demonstrates that there will be some impact upon daylight for the planned adjacent schemes. However, having regard to the regeneration aspirations for this area, the dense urban environment that will be created when redevelopment of the sites is realised and the level of detrimental impact likely to arise, it is not considered to be so significant as to warrant refusal of this application. Furthermore a balance must be struck between the public benefits of the scheme and the harm that may arise to surrounding occupiers. This development would deliver high quality commercial and residential units including a generous amount of affordable housing, the new buildings would make a positive contribution the streetscene and character of the area as well as delivering enhanced public realm. On balance, the level of harm likely to arise in respect of daylight to future adjacent occupiers is not considered to outweigh the benefits of the proposal.

Overshadowing of amenity spaces

The Daylight Assessment submitted assessed the sunlight availability in the proposed communal garden and play space area along the northern boundary of the site. The space would meet BRE targets as set out in the amenity section above.

A separate assessment has been undertaken in respect of the impact of overshadowing the adjacent Burgess Park SINC and this has been discussed in the ecology section of this report.

The proposed redevelopment of the adjacent site to west (Burgess Business Park) proposes retention of the existing industrial building which runs along the full extent of the shared boundary. With this in mind it is not considered that development on this site would have a significant impact on the open spaces to the west the neighbouring block.

In respect of 25-33 Parkhouse Street there is a 'green link' located on the western boundary of that site. This landscaped area would form part of the external amenity space for that development and includes an element of playspace in the north-west corner adjacent to this application site. This area will be overshadowed by the blocks on 21-23 Parkhouse Street. The documents submitted with the application for 25-33 include an overshadowing analysis which takes account of both developments. The report identifies that this area would not meet BRE targets as only 36.6% of the space would receive 2 hours of sunlight on 21st March. However, the adjacent scheme also benefits from fully compliant generously sized rooftop terraces and therefore on balance the impact on this area of external amenity space is acceptable.

Noise and vibration

London Plan Policy D14 and NSP Policy P65 require developments to manage

the impacts of noise. The application was accompanied by a Noise Impact Assessment which included a noise survey to establish existing background noise levels. The assessment concludes that given the proposed façade elements with their specific acoustic performance properties, and subject to passive or fixed mechanical ventilation systems being designed to meet noise emissions limits in accordance with the Council's standards, the future residents of the development would not be adversely impacted by external noise.

In terms of impact of noise arising from the development it is not anticipated that introducing 33 residential units would give rise to unacceptable noise or disturbance to neighbouring sites. The noise assessment submitted considers the impact of plant required for the residential and commercial uses. The report notes that only residential plant will be operational overnight. The operational noise levels from the current selection of plant are predicted to be at least 6 dB below background noise levels during the day, and 7 dB below the background during the night-time. Therefore, this would not have an adverse impact at nearby properties.

The council's environmental protection team have reviewed the noise assessment and have not raised an objection in this respect subject to recommended conditions.

Agent of change principles (ability for commercial and residential uses to co-exist)

Adopted and emerging policies identify B1c uses as being a suitable use for co-location with residential use. However, it is important to ensure that such uses are accommodated within buildings that are fit for purpose in terms of layout and construction techniques and that proper regard has been given to technical matters such as soundproofing and ventilation. London Plan Policy D13 requires all developments to consider 'agent of change' principles to ensure that where new developments are proposed close to existing noise-generating uses, they are designed in a more sensitive way to protect the new occupiers, such as residents and businesses from noise and other impacts. This is an important consideration for this site given the proximity of proposed residential uses in relation to existing and proposed employment uses.

In order to respond to Policy D13, separate residential access routes and entrances have been created. The commercial units have been designed to ensure that the light industrial activities can take place within their units, removing risk of conflict with the residential element and allowing both uses to co-exist effectively.

The amenity space in the centre of the site, between the blocks will be separated from any servicing activity and requirements associated with the commercial uses, which will take place on Parkhouse Street using the existing highways servicing restrictions as agreed with Southwark's Transport Officers.

Several mitigation measures have been incorporated into the design of the proposals to ensure minimal impact on the residential uses. This includes the construction of a concrete structure to absorb all noise and vibration from the

ground floor use in Block B. A separate steel structure is provided within the overall concrete frame of the building which ensures that noise and vibration will not transfer into the concrete frame so as to minimise the impact on residential occupants on upper levels.

Sufficient mechanical ventilation will be incorporated into the buildings to ensure that the future users of the site are not exposed to poor air quality.

The submitted noise assessment confirms that existing and future residents are unlikely to be adversely affected by noise from the proposed uses.

To conclude, it is considered that the development ensures that the technical considerations such as adequate servicing, ventilation, mitigation of noise and vibration have been robustly considered to ensure the space designed and attractive and usable by the intended future occupiers in accordance with Policy D13.

Transport and highways

Chapter 9 of the NPPF seeks to ensure that transport issues are properly addressed as part of development proposals. Proposals must assess the impact upon existing transport networks, promote and maximise opportunities for sustainable transport modes whilst mitigating any adverse transport related environmental effects and must make a significant contribution to improving accessible movement and permeability as a key priority for place making. Paragraph 109 states “development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe”. This approach is reflected in Chapter 10 of the London Plan, Southwark Saved Policies 5.1, 5.2, 5.3 and 5.4, Core Strategy Strategic Policy 2 and the emerging NSP Policies (P48 – P54).

This application was accompanied by a Transport Assessment as well as a Framework Travel Plan. The documents have been reviewed by the Council’s Transport Policy and Highways Teams. Revised and additional highways, transport and construction related information was submitted to address initial comments raised in respect of loading and servicing arrangements.

Site context, proposed layout and response to highway network

The site is on the northern side of Parkhouse Street, the footway next to this site on Parkhouse Street connects westerly with the footways on Southampton Way, which lead westerly to the bus routes on the nearby Camberwell Road and easterly to the bus routes on the adjacent Wells Way. An east-west pedestrian route connecting Camberwell Road to Wells Way through Burgess Park lies at the immediate northern side of this site. There is a signed north-south cycle route on Wells Way between New Kent Road and Peckham Road and, there are few speed humps on Parkhouse Street, which could be converted into raised pedestrian crossings to perform a dual purpose of slowing vehicles down and at the same time assisting pedestrians in crossing this road safely.

The development would include a pedestrian route running adjacent to the footway on this side of Parkhouse Street connecting to a shared pedestrian-vehicle space at its western side and leading to a hard landscaped courtyard between the two blocks. This courtyard would accommodate a disabled car parking bay, provide access to the residential lobby and would also be used as amenity space; it has been designed to allow pedestrian links into the adjacent site and then beyond in Burgess Park should that become a realistic possibility and aspiration of the Council in the future.

It is proposed that refuse and similar size delivery and emergency vehicles would service this site from Parkhouse Street. Moreover, the courtyard would have ample vehicle manoeuvring space that would ensure that vehicles accessing and exiting the car parking bay would do so in a forward gear.

The proposed layout of the site is acceptable from a transport policy perspective. The proposal would provide a good environment for pedestrians and the limited vehicle users that would enter the site. It is considered necessary to secure enhancements to the surrounding highway network for the benefit of future occupiers. Hence, the applicant will be required to fund the construction of extended raised table on Parkhouse Street and resurfacing of the road segments at its both sides, contribute to improved pedestrian/cycle routes in the immediate environment of this development plus the creation of raised pedestrian crossings on the immediate stretch of Southampton Way.

Trip generation

This proposed development is in an area with low (PTAL of 2) public transport accessibility level but is close to a higher PTAL (4), approximately 570 metres east of the busy bus routes on the A215 Camberwell Road and 2.4km to Elephant & Castle train/tube station at its northern side. There are also bus routes within a short walking distance of this site on Wells Way. Concerning the vehicle movements expected from this development, Highways Officers have advised that, even taking into account the likely vehicle movements from other committed developments in this locality, the level of forecasted vehicle movements from this scheme (8 two-way vehicle movements) would not have any noticeable adverse impact on the current vehicular traffic on the adjoining roads. Regardless, the applicant has proposed few travel plan initiatives encompassing the provision of sustainable transport information and provision of travel card and car club membership to the initial occupiers of this development.

Servicing and deliveries including refuse storage and collection

London Plan Policy T7 deals with servicing and delivery arrangement during construction and end use. The policy requires provision of adequate space for servicing, storage and deliveries to be made off-street, with on-street loading bays only used where this is not possible. Construction Logistics Plans and Delivery and Servicing Plans should be submitted (appropriate to the scale of the development).

There are two dedicated bin stores in Block A to serve each function, providing separate refuse and recycling facilities for the commercial tenants (mainly from

Block A), and residents (from Block B). These will be both be accessed by residents and refuse operatives via a lobby which is accessed directly from Parkhouse Street. Refuse vehicles will be able to stop on Parkhouse Street within 10m of the entrances and collect the refuse, assisted by a small taper to the carriageway of Parkhouse Street. The refuse strategy has been accepted by Highways, Transport Policy and Waste Management Teams.

Car parking

London Plan Policy T6 seeks to encourage car free and car limited development as much as possible and sets maximum car parking standards for different uses whilst recognising the need for an appropriate provision if disabled parking and adequate arrangements for servicing. Major residential development should provide disabled parking spaces for 10% of dwellings (3% to be provided at the outset and 7% future proofed), non-residential uses should provide a minimum of 1 disabled space. All car parking spaces must be fitted with electric vehicle charging points. This approach is reinforced in NSP Policies P53 and P54.

The East Camberwell Controlled Parking Zone provides adequate parking control in this vicinity weekdays, from 08:30 to 18:30. There is a car club close to this development on Sam King Walk. The applicant has proposed one disabled car parking space on the site. Even though this car parking level is minimal, with future improvements to public transport infrastructure in this area including the potential Bakerloo line extension and the sought cycling/walking enhancements plus travel plan initiatives for this development, it is deemed satisfactory. The applicant's consultants have also carried out a car parking survey in May 2016 which found that 25(34%) of the 77 available on-street car parking spaces on the road segments proximate to this development were unoccupied. Whilst this survey has not been updated given the forecasted 8 two-way vehicle movements, which would mean 4 car parking spaces for 4 vehicles it is considered that sufficient car parking capacity would exist. In any event, the prospective residents of this development will be prevented from obtaining car parking permits under the CPZ in this locality. Nonetheless, the applicant will be required to provide active electric vehicle charging point for the proposed car parking bay.

Cycle parking and cycling facilities

London Plan Policy T5 sets minimum cycle parking standards for different uses. For this development a minimum of 5 spaces would be required for the commercial element (1 space per 250 sqm for long stay and 1 space per 1000 sqm for short stay) and 43 spaces for the residential including 2 visitor spaces. NSP Policy P52 would generate the need for 57 resident spaces and 3 long stay visitor spaces and 8 spaces for the commercial use (1 space per 250sqm for long and short stay).

The table below sets out the proposed cycle parking provision for the scheme

Residential	57 spaces , comprising: - 12 spaces provided via 6x internal Sheffield Stands, including 1x cargo bike space
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	- 44x Josta-style spaces - 1x disabled cycle space
Commercial	10 spaces comprising : - 8x Josta-style spaces - 1x internal Sheffield stand (2 spaces)
Visitor Cycle Parking (shared residential and commercial)	8 spaces comprising: - 4x external Sheffield stands (8 spaces)
TOTAL	75 spaces

The level of cycle parking provision is acceptable. A condition will be attached to ensure the facilities are provided prior to occupation.

Healthy Streets

London Plan Policy T2 requires development proposals to demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance. This application is car free save for one disabled space thus promoting walking, cycling and use of public transport. Contributions have been secured sustainable transport modes to accommodate the demand created by future occupiers of the site. The scheme has been designed to enhance public realm onto Parkhouse Street and provides high quality landscaped space internally with places for occupiers to dwell/relax. The development seeks to significantly enhance biodiversity through maximising urban greening on the site which will also help to improve air quality. The scheme has been designed to minimise air and noise pollution as much as possible.

Overall the transport and traffic related implications have been fully considered. The Council's Highways and Transport Teams are satisfied with the proposal.

Environmental matters

Construction management

Conditions and s106 obligations are recommended requiring the submission of a Construction Logistics Plan and Construction and Environmental Management Plan to enable sufficient control over the traffic and environmental effects of construction.

Water Resources, Flood Risk and SUDs

London Plan Policy SI5 seeks to limit the use of water within new developments, Policy SI 12 seeks to ensure that new developments do not increase the risk of flooding on or offsite and SI13 promotes Sustainable Urban Drainage techniques (SUDs). Developments must properly assess the risk of flooding and include appropriate mitigation where required. There is also a requirement to enhance

urban greening and sustainable surface water drainage techniques. This requirements are also reflected in the current and emerging Southwark policies.

The application site is located within Flood Zone 2/3 and therefore a Flood Risk Assessment was submitted detailing how the development has been designed to address flood risk and SUDs proposals. The assessment has been reviewed by the council's drainage team, the GLA and Environment Agency. No objection is raised subject to a recommended condition regarding SUDs.

Land contamination

A desk top ground investigation assessment report has been submitted by the applicant (an update was submitted following amendments to the scheme). The report recommends further intrusive investigations are undertaken. The assessment has been reviewed by EPT, in line with this a condition has been recommended requiring further assessments be submitted.

Air quality

A key priority for the London Plan is to tackle poor air quality (Policy GG3 and SI 1). This is reinforced in Southwark's development plan policies. Core Strategy Policy 13 requires developments to address poor air quality. NSP P64 seeks to ensure that developments achieve or exceed air quality neutral standards; and address the impacts of poor air quality on building occupiers and public realm users by reducing exposure to and mitigating the effects of poor air quality.

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 operational use of the development. The report concludes that the effects on air quality during construction and operation are considered to be negligible subject to appropriate air quality and dust monitoring taking place and the suggested mitigation being implemented.

The council's environmental protection team has reviewed the submission and advised that there is no objection to the proposal subject to conditions to control construction management.

Light pollution

The application was accompanied by a lighting assessment. The assessment concludes that subject to the recommended lighting strategy the proposed scheme will not cause any exceedances of either the ILP pre-curfew or post-curfew obtrusive light limitations at local residential and ecological receptors. As such the proposed detailed design of the development is not predicted to result in any significant adverse impacts with respect to local sensitive locations. Provided the specified lighting design is implemented, the sky glow levels associated with the development will not have a significant effect on the surrounding dark sky landscape.

The lighting impact on ecology has been discussed in detail in the ecology section of this report. In terms of the impact upon residential amenity the lighting assessment has been reviewed by the EPT and is found to be acceptable.

Archaeology

Saved Policy 3.19 and NSP Policy P22 advises that new development should make provision for the protection of archaeological resources. The site is not located within an archaeological priority zone. However, NSP22 requires an archaeological assessment to be submitted. An assessment was submitted and reviewed by the Councils archaeologist. No further archaeological assessment, fieldwork or conditions are required.

Energy and sustainability

Chapter 9 of the London Plan deals with all aspects of sustainable infrastructure and identifies the reduction of carbon emissions as a key priority. Policy SI2 requires all developments to be net zero carbon with a minimum onsite reduction of 35% for both commercial and residential. Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures. Where developments are unable to meet net zero carbon targets any shortfall between the minimum 35% and zero carbon must be mitigated by way of a payment towards the carbon offset fund. The energy strategy for new developments must follow the London Plan Hierarchy (be lean/ be clean/ be green/be seen) and this must be demonstrated through the submission of an Energy Strategy with applications and post construction monitoring for a period of 5 years.

Saved Policy 3.4 and Core Strategy Policy 13 sets out Southwark's current adopted approach to ensuring that new developments tackle climate change, the approach is generally consistent with London Plan Adopted Policies whilst also requiring new commercial developments to meet BREEAM 'Excellent'

NSP Policy P68 reflects the approach of the London Plan by seeking to ensure that non-residential developments achieve a BREEAM rating of 'Excellent' and include measures to reduce the effects of overheating using the cooling hierarchy. P69 reflects the London Plan approach of 'lean, green and clean' principles. P69 requires residential buildings to be zero carbon on site and non-residential buildings to be zero carbon with an onsite reduction of at least 40%. Any shortfall can be addressed by way a contribution towards the carbon offset fund. This policy is not yet adopted but clearly indicates the direction of travel and strong commitment that Southwark has to tackling climate change with its onsite targets being more onerous than the London Plan once fully adopted.

At the present time the standard which must be achieved for this development is zero carbon for both elements with a minimum of 35% carbon reductions on site and any shortfall being mitigated by way of a contribution. Energy and Sustainability Assessments based on the current adopted planning policy were submitted. In response to the GLA Stage 1 comments further energy information

was submitted to justify the approach taken.

Whole life cycle and carbon capture

A Whole Life Carbon Assessment and separate Whole Life Carbon Assessment Template have been submitted. The Assessment has been prepared in accordance with the GLA guidance and explains the strategies which will be adopted at the end-of-life of the building to ensure circularity, and the Template document includes a declaration of the end-of-life scenario of the building elements. The document has been reviewed by the GLA and largely found to be acceptable although some minor areas of clarification have been requested as part of the Stage 2 referral. There is a requirement for post construction reviews, this should be secured in the s106 agreement.

Carbon emission reduction

Overall, the energy assessment asserts that the residential element of the scheme would achieve a carbon saving of 69% on site, the commercial element would achieve 54% saving and the combined carbon reduction would be 65%. On this basis the proposal falls short of the zero carbon requirement but would meet adopted 35% London Plan and Southwark target for onsite reductions. The shortfall between 35% and zero carbon will be met by way of a carbon offset payment which would accord with current adopted policies. To this end a payment of £96,140 (1012 tonnes shortfall x £95) should be secured by way of an s106 agreement.

Be Lean (use less energy)

The proposed development will incorporate a range of energy efficiency measures including levels of insulation exceeding current Building Regulations requirement, the installation of high performance glazing, external shading devices, energy efficient lighting and natural ventilation in all habitable spaces. The implementation of these measures would reduce regulated CO2 emissions by 10% and 16% for the domestic and non-domestic spaces respectively. This would meet London Plan targets for energy reduction.

Be Clean (supply energy efficiently)

The possibility of employing a decentralised energy network was investigated. Currently there is no district heating network available. However, a plan is under development and a new district heating network might become available in the coming years. The development has been designed to allow future connection to a district heating network should one become available. This should be secured in the s106 agreement. In the meantime an electric central system providing heating and hot water is proposed for this scheme. This is considered to be acceptable.

Be Green (Use low or carbon zero energy)

Photovoltaic panels are proposed. In total approximately 56.04m² PV panels with 11.55 kWp will be installed on the two proposed buildings. The photovoltaic array will supply electricity to the residential units with a system peak power of 6.16 kWp and to the commercial areas with a system peak power 5.39 kWp. The heating and hot water demand of the building will be provided using air-source heat pumps. ASHPs will contribute 100% of the heating and hot water annual demand. A single, centralised, Air Source Heat Pump (ASHP) system is proposed in Block B which will serve both blocks.

Be Seen (Monitor and review)

The London plan asks developers to monitor energy use during the occupation and to incorporate monitoring equipment to enable occupants to monitor and reduce their energy use. Displayed energy use within individual units will allow occupants to understand the way in which they consume energy and how much it costs. The proposed scheme will explore opportunities to link the proposed heating and mechanical ventilation systems to a computer based central monitoring system.

In accordance with London Plan policies it is appropriate to secure post completion monitoring within the s106 agreement.

Circular economy

London Plan Policy SI7 seeks to promote resource conservation, waste reduction, increases in material re-use and recycling, and reductions in waste going for disposal through the requirement of new development to submit a circular economy statement. Such statements must demonstrate Circular Economy Statement should be submitted, to demonstrate how all materials arising from demolition and remediation works will be re-used and/or recycled; how the proposal's design and construction will reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life; opportunities for managing as much waste as possible on site; adequate and easily accessible storage space and collection systems to support recycling and re-use; specify how much waste the proposal is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy. The statement must also identify how performance will be monitored and reported.

A Circular Economy Statement has been submitted in line with the GLA's requirements. A pre-demolition audit will be commissioned to maximise the recovery of materials, sustainable procurement plan will be used for new materials. A Site Waste Management Plan will also be prepared to develop and implement procedures to sort and reuse and recycle demolition and construction waste. The plan will also highlight strategies for designing out waste and reducing waste generated on site. The new blocks will follow the best practice principles detailed in the plans with the intention of minimising waste first before reuse, recycling and disposal. For operational waste, appropriate space has been designed to allow for access and collection of waste which includes recycling.

The proposed commitments to minimise the quantities of materials and other resources (energy, land, water) used, and measures for sourcing materials responsibly and sustainably are considered to be acceptable in principle. The GLA have requested additional details in respect of construction processes and operational waste management. Such details have been provided and will be reviewed by the GLA as part of the Stage 2.

Overheating

London Plan S14 requires major development proposals to demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the London Plan cooling hierarchy. All passive measures have been explored as far as practicable following the cooling hierarchy and simultaneously ensuring that energy, daylight and overheating matters are balanced. The g-value has been balanced to reduce solar gains but also to improve the energy efficiency of the building. A lower g-value would have negative implications on CO2 emissions or would require smaller windows. The U-value of windows has also been maximised. A lower g-value would result in failure in meeting the 10% target of the 'Be Lean' stage of the energy hierarchy. Orientation, high performance building fabric and fenestration, shadings, natural and mechanical ventilation as well as energy efficient lighting have all been considered and appropriate strategies have finally been incorporated. This development proposes a Mechanical Ventilation with Heat Recovery system specified to enhance the Indoor Air Quality whilst increasing the thermal efficiency of the development. Energy efficient design and low energy lighting will be used to mitigate the risk of overheating and avoid the need for cooling as far as practicable.

This application was accompanied by an overheating assessment. The purpose of the overheating assessment is to determine the comfort levels in the main habitable rooms (bedrooms, common living rooms and kitchens) during the summer months when the risk of overheating is present. The risk of overheating in the non-residential spaces has also been assessed. The analysis results show that the strategies proposed for both the residential and commercial elements will ensure compliance with overheating requirements, and adequate indoor environmental conditions for the occupants will be ensured throughout the year. As part of this Guidance will be provided to occupants on how to minimise the risk of overheating in their dwellings. This will especially include guidance on how to operate windows and shading devices when needed

BREEAM

Strategic policy 13 of the Core Strategy requires the development to achieve BREEAM 'excellent'. A BREEAM Pre-assessment report has been undertaken which demonstrates that an "excellent" standard can be achieved which meets the policy requirement and is therefore acceptable. It is noted that the BREEAM Assessment seeks to achieve a number of credits through ecological features on site which is entirely appropriate given the relationship to the adjacent SINC. A condition to secure BREEAM 'excellent' is recommended.

Digital Connectivity

London Plan Policy SI6 introduces the need for new developments to address London's requirements for enhanced digital connectivity. The policy requires development proposals to ensure that sufficient ducting space for full fibre connectivity infrastructure is provided to all end users, to meet expected demand for mobile connectivity generated by the development, to take appropriate measures to avoid reducing mobile connectivity in surrounding areas; and to support the effective use of rooftops and the public realm (such as street furniture and bins) to accommodate well-designed and suitably located mobile digital infrastructure.

In order to address this policy requirement a condition is recommended to ensure that the development can install appropriate ducting for future connection to the full fibre infrastructure.

Summary

In conclusion subject to the building meeting BREEAM Excellent, being constructed in accordance with the details set out in the energy strategy, ensuring provision is made for future connection to a district CHP and mitigating the impact of the shortfall in terms of onsite carbon reduction, the proposal is considered to be acceptable.

Planning obligations (S.106 agreement)

Saved Policy 2.5 of the Southwark Plan and Policy 8.2 of the London Plan advise that planning obligations can be secured to overcome the negative impacts of a generally acceptable proposal. Saved Policy 2.5 of the Southwark Plan is reinforced by the recently adopted Section 106 Planning Obligations 2015 SPD, which sets out in detail the type of development that qualifies for planning obligations. Strategic Policy 14 'Implementation and delivery' of the Core Strategy states that planning obligations will be sought to reduce or mitigate the impact of developments. The NPPF which echoes the Community Infrastructure Levy Regulation 122 which requires obligations be:

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

Following the adoption of Southwark's Community Infrastructure Levy (SCIL) on 1 April 2015, much of the historical toolkit obligations such as Education and Strategic Transport have been replaced by SCIL. Only defined site specific mitigation that meets the tests in Regulation 122 can be given weight.

Planning Obligation	Mitigation	Applicant Position	
Provision of affordable housing units	Secure the provision of 16 affordable units (56 hab rooms) all as social	Agreed	

	<p>rented tenure comprising</p> <ul style="list-style-type: none"> • 4 x 1b2p • 4 x 2b3p • 4 x 2b4p • 4x3b5p <p>Affordable housing provisions and delivery controls, including provision for review mechanisms (if development not commenced within 2 years)</p> <p>Affordable housing monitoring contribution (16 x £132.35 = £2,117.60)</p>		
Delivery of commercial floorspace	None of the residential units to be occupied until the commercial units have been practically completed and made available for occupation		
Wheelchair accessible housing	<p>1 x private unit (2b4p) 2 x social rented units (2 x 2b3p)</p> <p>Marketing, allocation and fit out of the wheelchair units</p>	Agreed	
Secure 20% affordable workspace	198 sqm of B1c floorspace within Block A	Agreed	
Loss of employment floorspace contribution	<p>10% of FTE jobs that may have been provided within the (net) lost floorspace. £4300 per FTE lost</p> <p>For B1c space area per FTE is 47 sqm (as set out in the s106 SPD)</p> <p>99sqm/47 = 2.1 FTE</p>	Agreed	

	10% of 2.1 = 0.21 round up to 0.5 post = £2150		
Ensure unrestricted access to all external amenity spaces and onsite play space for occupiers of all residential units		Agreed	
Offsite playspace contribution for 5+ year olds	£16,912	Agreed	
Future connection to a district CHP		Agreed	
Carbon Offset Payment	£96,140	Agreed	
Energy use monitoring to meet 'Be Seen' requirements of LP policy and Whole Life Cycle Carbon Assessment Post Construction Reviews		Agreed	
Transport and Highways	Improvements to Southern section of Parkhouse Street £1,280 Improvements to buses £30,000 Raised table on Parkhouse Street + resurfacing £35,000 Cycle hire/docking station £33,000 DSP Bond £3,300 Total = £102,580	Agreed	
Future proof public access through the site into the adjacent scheme (25-33 Parkhouse Street) in order to enable access into Burgess Park should that link become		Agreed	

available in the future.			
Landscaping and maintenance for a 10 year period on the park side of the boundary wall	£9,000	Agreed	
Financial contribution towards habitat enhancement in Burgess Park	Final sums being negotiated and will be updated verbally to committee	Agreed in principle	
Tree planting mitigation (to offset the impact of providing a planter rather than street trees on Parkhouse Street)	2 trees at £4,500 per tree, so that these are provided within the vicinity. Total = £9,000	Agreed	
Travel Plan		Agreed	
Delivery and Servicing Plan		Agreed	
Construction Logistics Plan		Agreed	
S278 works If consent is granted the developer must enter into a S278 agreement to complete the following works:		Agreed	
<ul style="list-style-type: none"> ○ Repave the footway on Parkhouse Street fronting the development using materials in accordance with Southwark's Streetscape Design Manual (granite kerbs and precast concrete slabs). ○ Construct a vehicle crossover on Parkhouse Street using materials in accordance with Southwark's Streetscape Design Manual. ○ Reinstate the redundant vehicle crossover on Parkhouse Street as footway. ○ Upgrade the existing speed humps to a raised pedestrian crossing using materials in accordance with Southwark's Streetscape Design Manual. ○ A Construction Management Plan should be submitted and approved by the Council prior to the implementation of the development. ○ Since the application site falls within 'General' designation the footways should be paved with precast concrete slabs with 150mm wide granite kerbs. This can be secured through an s106 Agreement and s278 Agreement. 			

<ul style="list-style-type: none"> ○ The applicant is to note that surface water from private areas is not permitted to flow onto public highway in accordance with Section 163 of the Highways Act 1980. Detailed drawings should be submitted as part of the s278 application confirming this requirement. ○ Prior to works commencing on site (including any demolition) a joint condition survey should be arranged with Southwark Highway Development Team to catalogue condition of streets and drainage gullies. Please contact Hernan Castano, Highway Development Manager on 020 7525 4706 to arrange. 		
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In the event that an agreement has not been completed by *31st December 2021* 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 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 (2016) and the Southwark Section 106 Planning Obligations and Community Infrastructure Levy SPD (2015).

Mayoral and borough community infrastructure levy (CIL)

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 invests in London as a whole, primarily Crossrail. Southwark’s CIL will provide for infrastructure that supports growth in Southwark. In this instance, based on information provided by the applicant, an estimated Mayoral CIL payment of £xx and a Southwark CIL payment of £xx would be due. This figure is an estimate only, and would be calculated in more detail when CIL Additional Information and Assumption of Liability forms are submitted prior to implementation.

Other matters

London Plan Policy D12 requires all major developments to be accompanied by a Fire Strategy. This application included a Fire Strategy, the strategy considers structural matters, identifies means of escape, fire spread and control, fire safety access and fire safety management. A site plan showing evacuation assembly

points is included within the document.

Community involvement and engagement

Consultation responses from members of the public and local groups

Pre Application Engagement

This application was accompanied by a Statement of Community Involvement. The document confirms that the following public consultation was undertaken by the applicant prior to submission of the application:-

- Two public meetings (invitations sent to all residents and business within 150m radius of the site as well as known community groups)
- Three exhibitions
- Two ward member briefings
- A dedicated website was set up for sharing material and providing a forum for submitting comments
- In March 2021 a newsletter update was sent to local residents and business within 150m radius of the site

Notwithstanding that there are no statutory requirements in relation to Community Involvement, this is considered to be an adequate effort to engage with those affected by the proposals. As part of its statutory requirements, The Local Planning Authority, sent letters to all residents, issued a press notice publicising the planning application and advertised the application on the website. Following the submission of revised plans a further re-consultation was undertaken with members of the public that had already commented on the original proposals. Adequate efforts have, therefore, been made to ensure the community has been given the opportunity to participate in the planning process

Full details of consultation and any re-consultation undertaken by the Local Planning Authority in respect of this application are set out in Appendix 2. The responses received are summarised at the start of this report.

Consultation responses from external and statutory consultees

GLA Stage 1 Response (summary): Land use: The re-provision of commercial and introduction of residential in line with the site allocation can be supported subject to commercial floorspace being B1(c) and some further details on mitigation measures and commitments. Housing and affordable housing: 54% affordable housing by habitable room is welcomed. All social rent is supported subject to details on affordability. As a GLA approved provider, proposals are eligible for Fast Track; an early review must be secured. Urban design: Approach generally supported, reconsideration of parking layout required. Fire safety statement required. Matters in relation to inclusive design, energy, flood risk, drainage and water and transport should also be addressed.

Officer Comment: following the Stage 1 response the scheme was revised to

accommodate B1c uses and subsequently to address the required setback from the adjacent SINC. Additional details were submitted in respect of fire safety, energy, flood risk, drainage, water and transport.

GLA Stage 1 (Supplementary comments): A number of the issues raised in Stage 1 have been addressed. There are minor outstanding issues to address in respect of Circular Economy and Whole Life Carbon Assessment as well as technical details around the energy strategy. These matters can be resolved as part of the Stage 2 Referral.

TfL (Stage 1 Summary): The following items should be addressed for the proposals to be compliant with the strategic transport policies:

- The applicant is required to increase long stay cycle parking;
- The applicant should work with the LB Southwark to incorporate Healthy Streets into the application and wider area;
- TfL request a Cycle Hire contribution of £70k to be secured;
- The provision of Electric Vehicle Charging Points to be secured by condition;
- The Travel Plan, Delivery and Servicing Plan and Construction Logistics Plan to be secured by the appropriate planning obligations.

TfL (Stage 1 Supplemental comments): The proposed amendments to the original planning application do not raise any strategic transport issues, however I note it includes the removal of loading bay on Parkhouse Street. There is limited information on the servicing strategy in the revised material, so it's difficult to comment on the implications for removal of the loading bay in terms of Healthy Streets, however this is primarily issue for the council as highway authority for Parkhouse Street.

The long stay cycle parking still may not accord with new London Plan standards, as this requires 1 space per 1 person 1 bedroom dwelling and 1.5 spaces per 2 person 1 bedroom dwelling; this obviously depends on the size of the 1 bed units.

We have been talking to the council regarding the potential for pooling s106 from the various developments in the Burgess Business Park area so that they all contribute commensurately towards public realm improvements, bus service capacity and a new cycle hire docking station. We consider the priority for funding in the shorter term should be for a new cycle hire docking station, as per the s106 request in our original comments. This will enable extension of the cycle hire scheme to the area, linking with new docking stations being delivered as part of the Aylesbury Estate redevelopment just the other side of Burgess Park. This would give new residents and businesses in the area direct access to cycle hire, which is proving to be a popular mode of travel during the pandemic and will play a key role during the recovery period. We would therefore welcome your support in securing this s106 funding.

Officer comments: Cycle parking standards have been met. The servicing strategy has been subject to extensive negotiation with Southwark officers and is considered to be the most appropriate solution for this site. S106 contributions towards buses and cycle hire facilities will be sought on a proportionate basis for each of the schemes coming forward in this area.

Natural England: No Objection

London Fire & Emergency: An undertaking should be given that access for fire appliances as required by part B5 of the current building Regulations Approved Document and adequate water supplies for firefighting purposes should be provided.

Officer Comments: a Fire Strategy has been submitted.

Thames Water: No objection subject to recommended Informatives

English Heritage: On the basis of the information available to date, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation advisers, as relevant.

Environment Agency: No objection subject to recommended conditions and informatives.

Secure by Design: Development is suitable to achieve Secured By Design accreditation, and in order to assist the development with achieving Secured By Design standards a condition is recommended.

Consultation responses from internal consultees

Transport Policy (summary – full comments incorporated into the analysis above): There are no objections from the highway and transportation perspectives subject to other comments from the Highways Team plus the following conditions that the applicant shall:

- Enter into S.106 agreement with the Council for safeguarding unrestricted public access on the proposed north-south pedestrian route through this site, financial contributions towards improved bus frequencies at this location and the planned Bakerloo line extension plus cycle hire docking station, enhanced pedestrian route to the bus route on Camberwell Road via Southampton Way including the provision of pedestrian crossing facilities and traffic calming measures on Southampton Way, cycle route improvement schemes and, payment of one year car club membership to the initial occupiers of this development, exclusion of this development from those qualified for car parking permits plus submission of a delivery & service management bond.
- Enter into S.278 agreement with the Council for the reconstruction of the footway segments flanking this site on Parkhouse Street and creation of an extended raised table on it, repair/resurfacing of the highway segment abutting this site on Parkhouse Street, creation of a 3metres-wide new vehicle entrance including the elimination of the redundant vehicle crossovers.
- Submit a scheme for the provision of 1(one) disabled car parking space equipped with active electric vehicle charging point plus cycle parking spaces including cargo and disabled cycle parking spaces, which must be contained in secure shelters, for approval.
- Submit a delivery and service management Plan incorporating transport

- operators with 'Silver' standard FORS for approval.
- Submit a construction management plan incorporating transport operators with 'Silver' standard FORS for approval.
 - Submit details of lighting along the proposed pedestrian routes, for approval.

Officer comment: relevant conditions and s106 obligations recommended.

Southwark Highways: Issues to be resolved prior to consent:

- The minimum effective pedestrian passing width between the proposed planter fronting the Development on Parkhouse Street and the existing kerb line should be 2.0m.
- It is unclear why the kerb line on the proposed plans has been set back from its current position. The existing carriageway width allows on-street servicing without obstructing traffic flows.
- If consent is granted the developer must enter into a S278 agreement to complete the following works:
 - Repave the footway on Parkhouse Street fronting the development using materials in accordance with Southwark's Streetscape Design Manual (granite kerbs and precast concrete slabs).
 - Construct a vehicle crossover on Parkhouse Street using materials in accordance with Southwark's Streetscape Design Manual.
 - Reinstate the redundant vehicle crossover on Parkhouse Street as footway.
 - Upgrade the existing speed humps to a raised pedestrian crossing using materials in accordance with Southwark's Streetscape Design Manual.
 - A Construction Management Plan should be submitted and approved by the Council prior to the implementation of the development.
 - Since the application site falls within 'General' designation the footways should be paved with precast concrete slabs with 150mm wide granite kerbs. This can be secured through an s106 Agreement and s278 Agreement.
 - The applicant is to note that surface water from private areas is not permitted to flow onto public highway in accordance with Section 163 of the Highways Act 1980. Detailed drawings should be submitted as part of the s278 application confirming this requirement.
 - Prior to works commencing on site (including any demolition) a joint condition survey should be arranged with Southwark Highway Development Team to catalogue condition of streets and drainage gullies. Please contact Hernan Castano, Highway Development Manager on 020 7525 4706 to arrange.

Officer comment: The pedestrian footpath to Parkhouse Street will be 2.4m wide. The existing highway is being set back to minimise the refuse drag distances, this matter was discussed extensively pre-submission of the revised information. The proposals are exceeding the refuse drag distances but this 'taper' served to minimise this distance and ensure that this was not an unacceptable proposal for LBS-Refuse and Veolia. The inclusion of this 'taper'

was agreed with the Waste Management Team and Transport Policy. The applicant has agreed to the s278 works and other conditions/informatives.

Drainage Team: No objection, condition recommended

EPT: no objection subject to recommended conditions.

Waste Management: The proposed refuse strategy would be accepted by our contractor for this specific case.

Local Economy Team: This development does not reach the threshold for employment in the construction phase obligations.

Also, this development's commercial space also does not reach the threshold for employment in the end phase obligations.

As a council-owned build, we are interested, where feasible, for any apprenticeship opportunities in council. These can be discussed with the Local Economy Team.

Ecologist: I have reviewed this application with regards to ecology. The September 19 PEA is good and covers the impacts on Burgess Park. I concur with their assessment. The report makes a number of recommendations in regards to Lighting and biodiversity net gain and new access to Burgess Park. These should be adopted in full. No objection subject to recommended conditions and necessary offsite mitigation being secured.

Archaeologist: No further archaeological assessment, fieldwork or conditions are required in consideration of this application.

Parks Team: Thank you for the opportunity to comment on this revised planning application. In addition to our original comments which remain relevant, we have the following supplementary comments: The Parks Service will require a method statement for construction of the wall, ideally it should utilise the foundation area of the existing wall so as not to impact on any tree roots. Should any work be required on the park side of the boundary, a licence will be required from the Parks & Leisure Service. Funding should be secured to plant the park side of the new brick wall to ensure it is 'green' on both elevations. The Design and Access Statement p20 refers to a pedestrian link to Burgess Park from a neighbouring development, the developer should be aware that any entrance into the park at this location would be via the New Church Road Nature Area, which is designated a Site of Importance for Nature Conservation (SINC); please be advised that at this time the Parks Service would not permit direct access, or an easement, from any residential or commercial property into the park via the nature area. The park is easily accessible via existing entrances on Wells Way. The nature area currently has low level public access, altering this into a public thoroughfare, for either pedestrians or cyclists, is highly likely to have a negative impact on the nature area and its wildlife and will divide the nature area in two. Consultation should be undertaken with the Parks Service if any works are likely to impact on the existing boundary trees.

Officer comments: appropriate conditions and s106 obligations secured.

Urban Forrester: No objection subject to recommended conditions and a contribution towards providing 2 street trees within the vicinity of the site

Community impact and equalities assessment

The council must not act in a way which is incompatible with rights contained within the European Convention of Human Rights

The council has given due regard to the above needs and rights where relevant or engaged throughout the course of determining this application.

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:

1. The need to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act
2. 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
3. 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.

The protected characteristics are: race, age, gender reassignment, pregnancy and maternity, disability, sexual orientation, religion or belief, sex, marriage and civil partnership. It is not considered that this application would harm any groups with protected characteristics. The provision of affordable housing would be a positive benefit of the scheme as a lack of access to affordable housing impacts disproportionately on Black, Asian and Minority Ethnic groups.

Human rights implications

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.

This application has the legitimate aim of xxxxx. 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.

Positive and proactive statement

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

The council provides a pre-application advice service that is available to all applicants in order to assist applicants in formulating proposals that are in accordance with the development plan and core strategy and submissions that are in accordance with the application requirements.

Positive and proactive engagement: summary table

Was the pre-application service used for this application?	YES
If the pre-application service was used for this application, was the advice given followed?	YES
Was the application validated promptly?	YES
If necessary/appropriate, did the case officer seek amendments to the scheme to improve its prospects of achieving approval?	YES
To help secure a timely decision, did the case officer submit their recommendation in advance of the agreed Planning Performance Agreement date?	YES

CONCLUSION

The proposal would bring about the regeneration and beneficial re-use of a redundant site within an aging industrial estate. Whilst it would result in an overall reduction in employment floorspace, the refurbished and redeveloped space would be of a much higher quality, able to attract a wider range of occupiers and support higher employment density. It has the potential to deliver 52 jobs within the completed development, and would include a higher than policy required provision of affordable workspace which should be given significant weight in the decision making process.

National, regional and local planning policies make it clear that the delivery of additional housing is a key priority for the planning system and there is a strong presumption in favour of development that will deliver housing. There is a demonstrable and acute need for additional housing in the borough across all tenures and the Council is committed to delivering a significant number of homes through redevelopment of their own land. This proposal would deliver 33 new homes on a Council owned site which would include the provision of 52% affordable housing by habitable room, all of social rented tenure which would contribute to the most acute needs of the Borough. The benefits of this are an important material consideration.

The inclusion of housing on the site is a departure from saved Southwark Plan Policy 1.2 and Core Strategy Policy 10 relating to preferred industrial areas. This must be weighed against the wider benefits of the scheme, and with regard to the emerging policy within the draft NSP which proposes a change from an industrial use at the site to a mixed-use employment and residential neighbourhood. It is not considered that approval of this application would undermine the future of the PIL, or the emergence of policies within the draft NSP.

The design would be of a high quality making a positive contribution to the townscape of Parkhouse Street. Sufficient setback of the buildings, appropriate landscaping and mitigation has been secured to limit any harm to the adjacent park and SINC. Whilst there would be some harm to the setting of the nearby heritage assets, this is considered to be less than substantial harm which would be outweighed by the wider benefits of the proposal.

Subject to conditions to control the development in detail the development would offer a good standard of amenity to future residents of this site and would not cause significant harm to existing neighbours. Furthermore the development of this site would not prejudice the future development of adjacent sites.

Subject to the recommend conditions and s106 obligations the development has satisfactorily addressed transport and sustainability policies.

It is therefore recommended that planning permission be granted, subject to conditions, the timely completion of a S106 Agreement and referral to the Mayor of London.

BACKGROUND INFORMATION

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
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: 0207 525 0254 Council website: www.southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Consultation undertaken
Appendix 2	Consultation responses received
Appendix 3	Planning history of the site and nearby sites
Appendix 4	Relevant Planning Policies
Appendix 5	Recommendation

AUDIT TRAIL

Lead Officer	Stephen Platts, Director of Planning	
Report Author	Gemma Usher	
Version	Final	
Dated	23 June 2021	
Key Decision	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments included
Strategic Director of Finance and Governance	No	No
Strategic Director of Environment and Leisure	No	No
Strategic Director of Housing and Modernisation	No	No
Director of Regeneration	No	No
Date final report sent to Constitutional Team		24 June 2021

